

WANDSWORTH

Statement of Consultation

Local Plan Partial Review Publication
(Regulation 19) Version
January 2025





Statement of Consultation (Regulation 19 Version)

Wandsworth Local Plan Partial Review (LPPR)

Advisory Note

This version of the Consultation Statement has been published at the Regulation 19 stage to support the public consultation.

It is the Council's intention to update this document further to support the submission and subsequent Examination in Public of the Local Plan Partial Review, including to incorporate details of the consultation undertaken at the Regulation 19 stage.

This version of the Consultation Statement should therefore be considered a draft.

January 2025

Contents

1. Introduction.....	3
2. Background and Local Plan Stages	4
3. Local Plan Regulation 18	4
4. Conclusions and Next Steps	7
Appendix 1.A: List of Consultees at Regulation 18.....	8
Appendix 1.B: List of Respondents at Regulation 18.....	52
Appendix 2: Consultation Email/Letter to Consultees.....	58
Appendix 3: Evidence of engagement.....	60
Appendix 4: Summary of main issues (Regulation 18).....	74
Appendix 5: Statement of Representations Procedure.....	82
Appendix 6: Full responses at Pre-Publication (Regulation 18) stage.....	83
Appendix 7: Regulation 18 consultation and Initial Response form.....	313

1. Introduction

- 1.1. This Consultation Statement accompanies the Wandsworth Draft Local Plan (Partial Review) at the Regulation 19 stage of its preparation.
- 1.2. This Consultation Statement describes how the Council has undertaken public consultation and stakeholder involvement in the production of the Local Plan Partial Review to date, setting out how such efforts have shaped the Plan. It includes the key and main issues raised by representations and the Council's responses where appropriate.
- 1.3. This Statement has been prepared in accordance with Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), which requires, at part (c), the publication of a statement setting out:
 - i. Which bodies and persons the local planning authority invited to make representations under Regulation 18 (see Appendix 1: List of Consultees – Regulation 18).
 - ii. How those bodies and persons were invited to make representations under Regulation 18 (see Section 3).
 - iii. A summary of the main issues raised by the representations made pursuant to Regulation 18 (see Appendix 4: Summary of main issues).
 - iv. How many representations made pursuant to Regulation 18 have been taken into account (see Appendix 1).
 - v. If representations were made pursuant to Regulation 20, the number of representations made, and a summary of the main issues raised in those representations (see Section 3).
- 1.4. This Consultation Statement sets out details on the Regulation 18 consultation undertaken, which was in accordance with the requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012. It also demonstrates that public involvement is consistent with Wandsworth's Statement of Community Involvement (SCI) adopted in 2019, and updated in 2025.
- 1.5. Pursuant to the requirements of Regulation 22, this Consultation Statement will be updated prior to the submission of the Wandsworth Draft Local Plan (Partial Review) to the Secretary of State to additionally include a copy of any representations made under Regulation 20 and a summary of the main issues raised in those representations.
- 1.6. Wandsworth's adopted Local Plan (2023-2038) sets out policies and site allocations that will guide development in the borough over the next 15 years. The Local Plan Partial Review commenced alongside the adoption of the Local Plan in July 2023, aiming to embed the Council's ambitions for a fairer, more compassionate, and more sustainable borough, with a particular focus on maximising the creation and delivery of genuinely affordable housing for residents, particularly social rent.
- 1.7. This Consultation Statement details the consultation that was undertaken at the Regulation 18 stage of the Local Plan Partial Review's preparation. The Statement seeks to assist the Inspector at the Examination in determining whether Wandsworth's Local Plan Partial Review complies with the requirements for public participation.
- 1.8. A separate Duty to Co-operate Statement has been published to cover the engagement that has taken place with adjoining Boroughs and prescribed duty to co-operate bodies. It also addresses the context for subregional and London-wide joint working, informing the stages of preparing the Local Plan in line with the requirements of the NPPF.

2. Background and Local Plan Stages

Overview of consultation

2.1. The Publication version (Regulation 19) consultation is the second of three formal stages in reviewing the Local Plan. The first stage was the Pre-Publication (Regulation 18) consultation in late 2023 and the final will be publishing the examination version.

Pre-Publication Local Plan (Regulation 18 Stage)

2.2. The Local Plan Partial Review was initiated to review and update housing policies as they relate to increasing the provision of genuinely affordable housing for local people, including maximising the delivery of homes for social rent.

2.3. The Regulation 18 Statement set out the Council's ambitions for reviewing and updating Policy LP23 Affordable Housing and other policies as they relate to strengthening provision of homes for social rent for local people, together with any other consequential changes necessary for consistency across the Plan. It sought:

- To strengthen the Local Plan policy by setting out a clear policy requirement for new housing developments in the borough to provide at least 50% of dwellings as affordable homes delivered on site;
- A greater proportion of all new affordable homes to be genuinely affordable, preferably a 70/30 split in favour of social rent;
- To require affordable housing from small sites below the current threshold of 10 or more homes (gross).

3. Pre-Publication Local Plan (Regulation 18)

3.1. The first six week consultation ran from 23 October to 4 December 2023.

3.2. The Draft Local Plan Partial Review consultation material published on the [Council's website](#) included the following documents:

- Regulation 18 Statement
- Sustainability Appraisal
- Equality Impact and Needs Analysis
- Habitat Screening Assessment

Who was consulted

3.3. The Local Planning Authority consults extensively on all planning documents and has an ever-evolving consultee database stored on Keystone Objective, an engagement system. This system is updated at each consultation event or when notified by consultees. All Specific Consultees (as identified under Part 1 of the 'Regulations') have been consulted. In addition, the Keystone Objective consultee database ensures that all interested parties who have previously expressed an interest or commented are notified by means of email or letter. Over 2,000 consultees were consulted as set out in Appendix 1.

How we consulted

- 3.4. A comprehensive effort was undertaken in advertising the consultation and engaging the community in the Local Plan process. The dedicated webpage for the consultation process contained a link to an online consultation form created using Keystone Objective. The form had 10 questions which required respondents to state whether they agreed or objected. This is set out in Appendix 6.
- 3.5. The consultation form was also available to download and complete as a form-fillable PDF and submit via email to planningpolicy@wandsworth.gov.uk or by post to: Planning Policy Team, Town Hall, Wandsworth. The email address is a direct line to the Planning Policy team and is checked on a daily basis.
- 3.6. Methods used to consult included the following:

Email/Letters

- A notification letter sent to all on the Local Plan consultee database (approximately 2,000 residents, local businesses and organisations and statutory consultees).
- Alternatively to making comments directly into the Keystone Objective Consultation Portal as described above, written responses including letter and email responses were also welcomed at Council offices or libraries.

Publicity and Advertising

Posters

- Digital Posters were put up at 25 locations across the borough for the final two weeks of the consultation period. Digital posters are the electronic billboard screens in public areas such as at bus shelters. See Appendix 3.

Summary Leaflets

- Feature in Brightside October 2023 edition which is the magazine of Wandsworth Council and contains a range of information about services and events (140,000 residents), Brightside Online (23,000 residents).
- Homelife magazine article December 2023, which is the Council's housing newsletter.

Social Media

- In addition, the Council used social media to publicise the consultation. Councillor Dikerdem posted to his X account on the 8 November 2023, and his Instagram account on 23rd November 2023 a video on the partial review and a link to Citizenspace for comments and responses. <https://x.com/wandbc/status/1722295176318575081>
- Cllr Dikerdem also published an article on the new Local Plan <https://x.com/wandbc/status/1623690923103162370> (9th Feb 2023).
- The Council published an article on its website on the 2nd of October 2023 <https://x.com/wandbc/status/1623690923103162370>

Summary of Consultation Responses

- 3.7. In total, comments were received from 228 respondents, including from Duty to Co-operate bodies. All comments submitted have been fully considered and an individual officer response has been formulated and available in Appendix 6.
- 3.8. A summary of the main issues raised and how these have been addressed in the Local Plan has been included in Appendix 4.

Consultation Post-Regulation 18 Stage

- 3.9. Between the end of the Regulation 18 stage consultation and the preparation of the Regulation 19 policies, the policy team have worked with the corporate Communications team to devise a consultation strategy with the express aim of identifying individuals and organisations who may have a direct interest in the changes being made to the Local Plan, with a particular focus on those whom would not ordinarily be represented or otherwise involve themselves in Local Plan consultations. This had led the team to identify existing forums, such as Wandsworth's Area Housing Panels, the Borough Residents Forum and the networks of known voluntary and community sector groups, to introduce and explain the purposes of the plan and the reasons for its review.
- 3.10. Specific consultation was undertaken in the form of workshops and presentations to these groups. An example of the presentation given is attached at Appendix 3. It offers an overview of the role of planning generally, the production of the Local Plan and the reasons behind the review. Officers introduced the Local Plan Partial review and discussed the three main ambitions:
- At least 50% of homes provided on large developments to be made available as 'affordable'
 - Of the affordable homes, 70% to be low-cost rent, and the remainder to be intermediate
 - A financial contribution towards affordable homes from small sites
- 3.11. The team have also been actively involved in writing articles for existing publications, such as Homelife, Brightside and the SEND newsletter to help familiarise these groups with the Local Plan process. The ultimate ambition is that these groups will engage more in the Local Plan in future stages because they are informed of the reason for the engagement and the timing of the formal consultation stages.

Area Housing Panels

- 3.12. The Council operates a quarterly series of Housing Panel meetings based on the areas of the borough (West, Central, Southern and Eastern). These meetings invite representatives of residents from the council's housing stock to regular discussions based upon issues of interest to them (including management, maintenance and organisational issues). The policy team identified these meetings as a key way of accessing residents and their networks. During the pre-Regulation 19 period, officers have attended all of the Area Panels in the May/June and September/October 2024 cycles, introducing planning and planning policy in the first meetings and following up with an update on progress in the second. Officers have committed to attend the next cycle of meetings in December and January 2024/25.
- 3.13. Representatives of the four Area Panels attend the Borough Residents Form twice a year. Policy officers attended the Forum in November 2023 and November 2024 to discuss the Local Plan Partial Review.

Voluntary and Community Services workshop

- 3.14. On the 2nd October 2024, an invited workshop was held for Voluntary and Community Sector organisations involved in supporting and advising people with housing issues. The list was compiled with the help of the Wandsworth Foodbank, who had made representations during the Regulation 18 consultation stage and were contacted afterwards to seek assistance in sourcing VCS groups who may wish to participate in later stages of plan-making. Members of voluntary and community groups in Wandsworth were invited to take part in a workshop on the Local Plan Partial Review. Officers provided an overview on the planning process, planning policy and an update on

the Local Plan Partial Review process. Those that wished to be included on the Local Plan database were added.

- 3.15. The group had a discussion about the need for more affordable homes in the borough, and spoke at length about inadequate temporary accommodation and the lack of appropriate housing for those most in need. The group discussed different types of people in the borough who would need a variety of types of housing products – for example, older people in the borough need suitably sized accommodation that does not isolate them from their community or peers, rough sleepers with substance dependencies would need specialist supported housing, and families with children and young people with impaired mobility would need specially adapted affordable housing.
- 3.16. Consultation methods were discussed at length, and suggestions were made as to how the Council could make the consultation process more inclusive to allow more people in the borough to take part. Suggestions included video-conferencing, simplifying the consultation portal and using community drop-in booths to consult with the public on the proposals.

Residents Conference

- 3.17. The Council organises an annual conference for Council tenants and leaseholders who are, or would like to be, actively involved in the housing departments formal and informal participation structures (including the Area Panels). The conference took place on October 23, 2024. Policy offers were present at the lunchtime networking session to discuss the Local Plan and its implications for housing policies.

4. Conclusions and Next Steps

- 4.1. This consultation statement forms part of the supporting information for the publication of the Local Plan Partial Review for formal consultation (under Regulation 19) of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 4.2. The Regulation 18 consultation of the Local Plan Partial review ran for a period of 6 weeks between 23 October to 4th December 2023. Following which a review of the comments received was undertaken. The Regulation 19 consultation is currently scheduled for early 2025.
- 4.3. The Regulation 18 consultation on the draft Local Plan Partial Review notified statutory and general consultation bodies, stakeholders (residents and businesses) and invited them to comment through a range of channels (including online, email and post and publication in a local newspaper). The Council considered the representations received. The Council considers that the plan-making process conforms to the Statement of Community Involvement and has therefore fulfilled the requirements of Regulation 22.
- 4.4. The following appendices set out a range of additional information and evidence to demonstrate effective consultation through the Local Plan Partial Review process to date.
- 4.5. It is the Council's intention to update this document and submit an updated version, pursuant to regulations, alongside the submission version of the Local Plan Partial Review following the conclusion of the Regulation 19 consultation. This updated version will additionally include all consultation activity delivered as part of the Regulation 19 consultation, a summary of representations received and an initial response to those representations where required.

Appendix 1 A – List of Consultees (Reg 18)**Agents**

First Name	Last Name	Organisation
Jon	Roshier	Rolfe Judd Planning
John M	Dyke	Savills Commercial Ltd
Jeremy	Evershed	Montagu Evans LLP
Craig	Tabb	DP9
Philip	Robin	Jones Lang Lasalle
Greg	Dowden	Indigo Planning Ltd
Jon	Roshier	Rolfe Judd Planning
Tom	Sweetman	DP9
Jon	Bradburn	Montagu Evans LLP
		Indigo Planning Ltd
David	Lewis	Battersea Society
Nick	Green	Savills
Sean	Tickle	
Richard	Tilley	CgMs
Catherine	Widdowson	Nathaniel Lichfield and Partners
Huw	Williams	
Peter	Mail	Ipress Limited
Philip	Villars	Indigo Planning Ltd
Richard	Tilley	CgMs Ltd
Jonathan	Marginson	DP9
Elizabeth	Howe	Montagu Evans LLP
Damien	Holdstock	Amec
Justin	Kenworthy	Barton Willmore
Robert	Le Clerc	Robert Le Clerc Consulting
Tim	Holtham	DP9 Planning
Blythe	Dunk	Jones Lang LaSalle
Lindsay	Garratt	Winckworth Sherwood
Michael	Wellock	Kirkwells
Sinead	Morrissey	Rapleys LLP
Ben	Ford	Quod
Mark	McGovern	SSA Planning Ltd
Claire	Dickinson	Quod
Sinead	Morrissey	
Graham	Timms	CB Richard Ellis Ltd
Mel	Barlow-Graham	Dron & Wright
Jenny	Hebb	Boyer Planning Ltd

First Name	Last Name	Organisation
Terence	Clark	Residents of 25-39 Westleigh Avenue Committee
Paul	Henry	DP9
Poppy	Carmody-Morgan	Quod
Lucy	Farrow	Carter Jonas LLP
Roger	Birtles	
Julia	Krause	Deloitte
Sean	Tickle	Rolfe Judd Planning
Jeremy	Evershed	Montagu Evans LLP
Ben	Fox	Planware
Jonathan	Smith	DP9
Julian	Austin	Amec
Jennifer	Watson	Jones Lang Lasalle Ltd
Philip	Allard	Wildstone Planning
Luis Ortega	Govela	
Leo	Cunningham-Baily	Quod
Chris	Brown	Rolfe Judd Ltd
Jeremy	Castle	Deloitte LLP
Kieran	Wheeler	Savills
Nigel	Garrett	Hives Architects
Jason	Lowes	Rapleys
Jonathan	Stoddart	CBRE
Melanie	Blanchard	Dentons
Tim	Bryne	Jones Lang Lasalle
Claire	Evans	Rolfe Judd Planning
		Turnberry Planning
Altine	Topping	Elias Topping
Chris	Gascoigne	DP9
Diana	Thomson	Savills
Donna	Smith	Planware
Amy	Birch	Deloitte
Chloe	Ballantine	Rapleys
Laura	Joseph	Wildstone Planning
Anna	Snow	
Kevin	Watson	
Adam	Conchie	Carter Jonas LLP
Richard	Springett	Simply Planning
Nicholas	Taylor	Carter Jonas LLP
Geogia	Hillstead	DP9

First Name	Last Name	Organisation
Paul	Burley	Montagu Evans
Vanessa	Clipstone	Simply Planning
Mark	Tombs	
Viktorija	Saveca	City Planning
Roger	Birtles	Simply Planning Ltd
Iain	Buzza	Savills
Neil	Wells	Quod
Tabitha	Lythe	
Claire	Stafford	
Oliver	Milne	Savills
Mark	Thomson	Savills
Jeff	Field	BNP Paribas Real Estate
Grant	Leggett	Boyer Planning Ltd
Charlotte	Orrell	Iceni Projects
Alex	Christopher	Turley Associates
Joseph	Wilson	
Tiffany	Mallen	Rolfe Judd
Alexandra	Milne	DP9 Planning
James	Ainsworth	Montagu Evans LLP
Nicole	Forster	Savills
Samuel	Elliott	Planning Potential Ltd
Jessica	McSweeney	Carter Jonas LLP
Craig	Slack	Turley Associates
Julian	Carter	Savills
Emily	Cochrane	Jones Lang LaSalle Ltd
Rory	Joyce	Brunel Planning
Iain	Buzza	Savills
Tom	Lawson	Rolfe Judd Ltd
Nia	Fraser	
Laura	Jenkinson	Avison Young
James	Elliott	
Emma	Gill	
Claire	Stafford	
Jonathan	Chidley	
David	Shiels	DP9
Freya	Turtle	Turley Associates
John	Cutler	BNP Paribas Real Estate
Tarun	Cheema	Centroplan
Freddie	Clarke	Avison Young
Jamie	Dempster	ROK planning
Edward	James	

First Name	Last Name	Organisation
Olivia	Dickie	Strutt and Parker
Kassie	Foot	Rolfe-Judd
Lucy	Bartley	Wood Plc
David	Clare	Habitat for Humanity GB Homes
Healthwatch	Wandsworth	Healthwatch Wandsworth
Shaun	MacArthur	
Natalie	Rowland	
Emily	Dirken	Montagu Evans
John		
Kirsty	Turner	Savills
Will	Lingard	
Joseph	Hickling	Boyer Planning Ltd
LM	Durrant	DPDS
Sam	Stackhouse	Montagu Evans LLP
Mark	Westcott	HGH Consulting
Daniella	Marrocco	
James	Guthrie	Quod
Tim	Price	savills
Ziyad	Thomas	planning issues
Helena	Burt	Rolfe Judd Planning
Matthew	Lloyd Ruck	Savills
David	Brown	Newsteer
Henry	Brown	Turnberry Planning
Edward	James	Savills
Evelyne	Bull	
Vincent	Gabbe	Knight Frank
Arnaud	Messon	The Original Tour
Rory	Chambers	
Joel	Jessup	Heatons
Siofra	Boyd	Rolfe Judd Planning
Patrick	Grincell	HGH Consulting
Lucy	Wakelin	Savills
Steve	Simms	SSA Planning Limited
Clifford	Rance	Clifford Rance Associates
Mark	Dodds	Lambert Smith Hampton
Ben	Kelly	Wildstone Planning
ROB	PEARSON	
David	Wilson	Savills
Tim	Rainbird	Quod
Angie	Fenton	Quod
		Tetlow King Planning

First Name	Last Name	Organisation
Angie	Fenton	Quod
Mandip	Sahota	Nicholas Taylor and Associates
David	Watson	Town Planning Bureau
Hannah	Whitney	Nathaniel Lichfield & Partners
Alex	Graham	Savills
James	Armitage-Hobbs	DP9
Nadine	James	Montagu Evans
Adam	Garcia	CBRE
Steven	Fidgett	Union4Planning
Guy	Bransby	Montagu Evans
Thomas	Hatch	Quod
Matthew	Roe	ROK planning
mandy	wetherell	DPDS
Ian	Fergusson	
Jodane	Walters	dp9
Stefanie	Mizen	Jones Lang Lasalle
Richard	Lemon	
Richard	Leman	SAV Group
Hannah Lorna	Bevins	Wood Plc
Alan	Piper	Alan Piper Consultancy
Joe	Wilson	CBRE Ltd
Caius	House	
Christopher	Collett	Carter Jonas LLP
Paul	Watson	Phillips Planning
Claire	Clark	Rolfe Judd Planning
Sarah	Temple	
Nona	Jones	DP9
Jan	Donovan	Rolfe Judd Planning
Ailish	Collins	Rolfe Judd Planning
Alex	Smith	Simply Planning Ltd
Rochelle	Flemming	Tetra Tech Planning
Ailish	Collins	
Matt	Verlander	Avison Young
Carla	Fulgoni	The Planning Bureau
Katarzyna	Bany	
Tom	Pemberton	montague evans
Edward	Ledwidge	Montagu Evans
niamh	burke	Carter Jonas

First Name	Last Name	Organisation
Alice	Hawkins	Turley
Laura	Elias	SEGRO

Organisations

Name	Position	Organisation
Derek Theobald	Chief Inspector - Community/Partnership	Tooting Police Station
Viv Evans	Head of Planning & Transportation	Royal Borough of Kingston-upon- Thames
Jane Hamilton		Westminster City Council
	Executive Director Planning & Conservation	Royal Borough of Kensington & Chelsea
Chris Price	Town Planner	Network Rail
Jan Lloyd	CEO	Covent Garden Market Authority
Claire Beadon		Wandsworth Bereavement Service
Mr R Armstrong	Member Planning Sub Committee	Clapham Society
Stuart Oliver		Wandsworth Friends of the Earth
Barbara Van Heel	Director	Action Space London Events Ltd
Mr Hugh Lockhart-Ball		Rotary Club Tooting
Mr Mark Dodgson		Balham Society
Vicar	Vicar	St Barnabas C of E Church
Rev Paul Kennington	Vicar	St Mary's C of E Church
Rev	Vicar	St Mary Magdalene C of E Church
Mrs Alison Patterson		St Nicholas C of E Church
Reverend Canon Peter Clark	Vicar	Christ Church C of E Church
Sue Farley	President	Battersea Spritualist Church
Rev	Vicar	St Alban's C of E Church
Rev Father	Parish Priest	St Boniface R C Church
Pastor Sid Rall	Southfields Venue Pastor	Everyday Church
Rev John Shepherd	Vicar	St Luke's C of E Church
Fr Christopher Heaps	Parish Priest	Church of the Sacred Heart

Name	Position	Organisation
Peter Croggon	Secretary	Abbotsleigh Road Residents' Association
Mrs Beatrice Crooks	Secretary	Balham & Tooting Sports & Social Club
Ms Rung Ratnpinyotip	Registered Owner	Rydevale Day Nursery
Judith Hunter		Battersea Village Residents' Association
	Business Analyst	Visit London
		London Wildlife Trust
Mr Christopher Edwards	Rear Commodore RSC	Ranelagh Sailing Club Ltd (The Embankment)
Mr Andrew Cordery	Director	Houston Lawrence Ltd
Mrs P Davies	Secretary	Carey Gardens Co-operative Ltd
Mr Christoph Kratz		Countryside Agency
Clare Chettle		London & Quadrant Threshold Homes
Mr Misbah Islam		Wandsworth Asian Community Centre
Joanne Woodward		London Borough of Enfield
	Group Planner (Regeneration & Development)	Forward Planning & Transportation, L B Newham
		London Borough of Waltham Forest
Mr Duncan Clarke	Planning & Transportation	London Borough of Sutton
	Strategic Planning & Development	London Borough of Bexley
Mr H Cowd	Head Teacher	Chesterton Primary School
Nicola Morris		Christie's
Mr John Trayner	Managing Director	Go-Ahead London
Georgie Cook	Planning Manager	Thames Water Property Services
Jim Nicolson	President	Vauxhall Society
Frances Radcliffe OBE	Chairman	Friends of Battersea Park
Ms Raksha Shah		Vanik Association of the UK
	Head of Operations Southern Region	Childrens Society
Mrs H Thompson		Childrens Flower Society
Rev Leroy Francis		Life Tabernacle Church

Name	Position	Organisation
Bruce St Julian-Bown		Wandsworth Society
	General Manager	Oily Cart Theatre Company
Mr A Karmani		Islamic Community
Heather Peterson		Age Activity Centre
Mr Neal Deans		St Georges Hospital NHS Trust
Sarah Banham	Chair	Clapham Junction Town Centre Partnership
Ruth Durbin	Head Teacher	Sir James Barrie School
Mervyn Millar	Chair	Puppet Centre Trust
R T Pannyfather	Commercial Manager	Arriva London
Mrs J Richardson-Chapple		Danemere St/Ashlone Rd Res. Assoc.
Nicholas Cooper		Seymour Road Res. Assoc.
Laura Simpson	Assistant Editor	South London Guardian Newspaper
Mrs Sunipa Rai	Secretary	Hindu Society
Rev Jon Daldin	Chaplin	South London Catholic Caribbean Assoc.
Mr Mozhar Ali		Danul Amaan Islamic Centre
Mr John Rattray	Vice-Chairman	Balham Society
Mr M Ouhla	Trustee	Al-Muzzammil Mosque
Mr Chris Carter	Vice Principal	South Thames College Further Education
Ben Clover	Reporter	South London Press
Tony Griffiths	Director of Major Capital Projects	SW London NHS Trust Estates
Geoffrey Cox	Centre Manager	Garfield Community Centre
Rose Freeman	Planning Assistant	The Theatres Trust
T Marteau		Savills Commercial Ltd
	Secretary	Polish Benevolent Fund Balham Parish
Miss P Cocklin		Hilsea Residents' Association
Miss Prue Raper	Secretary	Westside Residents' Association
Mrs P Davies	Chairman	Southfields Triangle
Matt Ball	Stakeholder Relations Manager	Southern
Kim Sullivan	Town Centre Manager	Balham Town Centre Partnership Board
Lt (SCC) D W Holland RNR		Wandsworth, Chelsea & Fulham Sea Cadets
Miss D M Hockley	Chairman	Primrose Mansions Ltd
Mrs Colleen Bowen	Chair	Wandsworth Access Association

Name	Position	Organisation
Mrs Cathy Salisbury		Sutherland Grove & Area Residents' Association
	Area Manager	Sustrans-National Cycle Network
Miss Christine Reeves	Sub-Committee Chairman	Traffic Transport and Parking
		South London Partnership
Manuel Button	Managing Director	Wandsworth Community Transport
John Horrocks		Putney Society
Steven Gough	Planning Director	Fairview New Homes Plc
Eddie Church		London Heritage Properties Ltd
John Dawson		Wandsworth Society
Harvey Heath	Secretary	Battersea Society
		Planning Aid
Diane Walls	Archaeology Advisor	English Heritage (GLAAS)
A D Taylor	Convenor - Planning Sub Committee	Wandsworth Society
Chris Laytham	Co-operative Manager	Patmore Co-operative Ltd
Brian Barnes MBE		Battersea Power Station Community Group
Nicola Hooshangpour	Office Manager	W J Marston & Son Ltd
Raminder S Jando		R J Associates
Ben Connop	Planning & Design Manager	St George (South London) Ltd
		Wandle Heritage Ltd
Mr James Smith	Co Chairman	Tonsley Residents' Association
Mr Christopher Wickham	Partner	Christopher Wickham Associates
John Archer		Ramblers Association (Hammersmith, Fulham&W'worth)
Andrew Harper	Partner	Holden & Partners
Christopher Borkowski	Managing Director	St James Investments
N H Bristow	Company Secretary	Chelsea Estates Ltd
Bill Bailey		Frendcastle
Lord Rogers		Richard Rogers Architects Ltd
Robert Wilson	Architect Director	Granit Architects
Ms Rosemary Torrington		Deodar, Merivale & Florian Rds Res. Assoc.
Bruce Mackenzie		Green Party
Shirley Passmore		Wandsworth Society
	Planning Manager	Michael Shanly Homes

Name	Position	Organisation
John Brindley	Planning Manager	Bellway Homes (SE) Ltd
Tim Villiers	Convenor	Clapham Society Transport Group
		National Air Traffic Services Ltd
John Assael		Assael Architecture
Mr Martin Mills	Secretary	Keildon Road Residents' Action Group
Harvey Heath	Secretary	Wandsworth Common Management Advisory Committee
Mark Jordan		Mark Jordan Architecture
Duncan Hawkins	Director	CgMs Consulting
Nigel Pallace	Director of Environment	London Borough of Hammersmith
Reggie Blennerhassett	Pro Vice-Chancellor & Director of Finance	University of Roehampton
	Design Executive	Crest Nicholson Residential (South) Ltd
Vicki Carroll		Wandsworth Environment Forum
Mr S Wallace		Putney Town Centre Partnership Board
	Principal Planning Officer	Fields in Trust
Janis Humberstone	Chairman	Dover House Residents' Association
Marian Burley	Director	Wandsworth Care Alliance
Eric Greber	Diocesan Surveyor	Diocese of Southwark Property Department
Oliver Chipperfield		Wandsworth Society
Susie Morrow	Campaigns & Council Liaison	Wandsworth Cycling Campaign
Mr Mike Ness	Director	Space Design Consultants Ltd
Mr Chris Shaw	Projects Director	Assael Architecture
Mr Jason Slocombe	Director	David Le Lay Ltd
Mr P W Lee	Architect	P W Lee & Associates
Mr Jonathan Smith	Principal	Jonathan Smith Digital Architects
Mr P D Elkins	Director	P D Elkins Drawing Services Ltd
Michael Noy	Director	Trovecroft
Mr Andrew Lea-Gerrard RIBA	Architect	Architectural Practise
Mr Peter Deakins	Senior Partner	P D A Partnership London
Lillias Gillies	Facilitator	Wandsworth Older People's Forum
Ms Razia Shariff	Director	Wandsworth Community Empowerment Network
Paul Robinson	Network Manager	Highways Agency

Name	Position	Organisation
Mr Jonathan Sheldon		House Builders Federation
Lourdes Prestamero		Battersea Fields Residents' Organisation
Mr Keith Garner	Chair	Ethelburga Tower Residents Association
Ric Hawley		Charterhouse
Mr Price		James Fisher & Son
Mrs Laura Sutton	Director	Savills
Chris Jago	Director	Houston Lawrence
Bob Butler	Managing Director	Plowden & Smith
Richard Sayer	Associate Director	Quinton Scott & Co
Patrick Dardis	CEO	Young & Co's Brewery
Mr Robert Barr	Mental Health NHS Trust Director	SW London & St George's
Mr Nigel Buckie		Object Architecture Ltd
Ms Rose deFalbe		Wandsworth Environment Forum
Mr Claude Partridge	Director	C.E.P Developments Ltd
	Property Manager	Lidl Uk GmbH
Mr Marc Newey	Chief Executive	Roehampton Club Ltd
Mr Oliver Colvile		Oliver Colvile
Mr David Patterson	Agent	Tooting Liberal Democrats
Andy Bow	Partner	Foster and Partners
Richard Broome	Director	Outer Space
		Marinezone Ltd
Malcolm Alsop		Alsop Verrill LLP
	Regional Director	Groundwork UK (London & SERegional Offices)
Laurence S Eaton	Deputy Director Asset Management and Utilisation	Metropolitan Police
John Booth	Chairman of the Management Committee	Parkside Community Project
Sarah Austin	Director of Primary Care and Service Development	Lambeth Primary Care Trust
Vijay Rajput		Tranwood Properties
Mr James Phillip	Pastor	Balham Seventh Day Adventist Church
Miss Caroline Collins	Manager	Wimbledon Park Co-operative Ltd

Name	Position	Organisation
Mrs Christine Fremantle	Member of Committee for open spaces, Batt. Soc.	Friends of Battersea Park
Jakki Morgan	Director	Support and Housing for People with Disabilities
	Ministry & Mission Co-ordinator	St Mark's C of E Church
K Brownnutt	Building Ministry Leader	West Side Church
Rev Dr J E S Jacobs	Leader	Congregational Union of Ethnic Churches
M J Murphy	Director	Centre Academy School
	Planning Policy Team Leader	London Borough of Haringey
Rev Father	Reverend	St Joseph's R C Church
Mr Robin Sims	Chairman	Valiant House Properties Ltd
Mr E Potter	Principal	Edward Potter Associates Architects
	Southwark Office	Health & Safety Executive
Linden Groves	Conservation Officer for London	Conservation Dept, The Garden History Society
Mr Haroon Karim	Chairman	Totting Islamic Centre
Nick Hutchings	Land Director	St George South London Ltd
William Saxby	Partner	Gerald Eve
Naz Choudhury	Managing Director	Real Burger World
Ruth Condell	Director	Careline Information Centre for Wandsworth
Mr Kevin Tompkins	Surveyor	Jensen Tyrrell
Mr Paul Lomas	Design Manager	Scotia Gas Networks & National Grid
Jim Green	Development Manager	Baylight Properties Plc.
Tarek Iskander		Battersea Arts Centre
Jatinder Verma	Artistic Director	Tara Arts Director
Mrs Betty Kelley	Secretary	Hazlehurst Estate Residents' Association
Chas Newens	Managing Director	Chas Newens Marine Co Ltd
Catherine Mason	Planning Assistant	Savills
Gill Chapple	Chairman	Covent Co-operative Ltd
Alexander Ashworth		Manifest
David Lewis	Chair, Planning Committee	Battersea Society
Mrs Debbie Kenny	Senior Delivery Manager	Jobcentre Plus

Name	Position	Organisation
Zbig Blonski	Head of Strategic Planning Planning Division Regeneration & Housing Department	London Borough of Lambeth
Stefan Kuchar	Chief Executive	Wandsworth Voluntary Sector Development Agency
Rashum Varne		Confederation of Indian Organisations UK
	Commanding Officer	Salvation Army
Rev Bill Warren	Vicar	St Margaret's Church Office
Fr Davis Vadakkumpadan		St Thomas A Becket R C Church
	Minister	Earlsfield Baptist Church
Rev Clare Taylor		Upper Tooting Methodist Church
		London Borough of Hounslow
	Group Planner (Policy)	London Borough of Islington
	Planning Policy Team	London Borough of Southwark
	Director General	Battersea Dogs and Cats Home
Malcolm Chevin	Area Director	Cemex UK Materials Ltd
Mrs J Bartley	Acting Headteacher	St Mary's Primary School
Dave Lakin	Project Manager	Museum of London Archaeology Service
Bridget Conigliaro	Chair	Esher Gardens & Bisley House Residents' Assoc.
Rev David Gillian	Superintendent Minister	Battersea Central Methodist Mission
Mr P Coulson	Member	Deodar, Merivale & Florian Roads Residents' Assoc.
Ms Jocelyn Cole		Contact a Family
Mr R A Hickie		Prince of Wales Drive Environmental Committee
Mr John F Cheetham	Head of Property Management	SW London Mental Health NHS Trust
Mr A Williams	Planning Consultant	Boyer Planning Ltd
Michael Buckingham		Hightrees House (Clapham Common) Ltd.
Mrs Sara Strickland		Northcote Business Network
Mr B Botting	Committee Member (Planning)	Friends of Battersea Park
Mr Julian Burton	Facilities Manager	Public & Commercial Services Union
Stephen R J Briegel		Allen Briegel New Homes & Development

Name	Position	Organisation
Stephen Benton	Head of Policy, Transport, Environment & Planning	London Councils
Simon Smith	Partner	Simon Smith & Michael Brooks
Jack Warshaw		Conservation Architecture & Planning
Michael Aukett		Michael Aukett Architects
David Mean		Burgess Mean Architects
Prof Paul O'Prey	Vice-Chancellor	Roehampton University
	Business Manager	Care Quality Commission
Gerard Livett	Regional Representative	Motorcycle Action Group
Mr Paul Durrell		Chartered Architects
Mr Alex Imlach		Alex Imlach Architects
Ms Clare Kakembo	Member	Wandsworth Older People's Forum
John Cooke	Executive Director	Mobile Operators Association
Mr John McEvoy	Chairman	Somerset Residents' Association
John G Dean		Dean & Co.
Tim Hall	Managing Director	Lewis Hickey Planning Ltd
Ms Alice Fookes	Conservation Area Manager	Victoria Drive Conservation Area
		CABE
Mr C B Hammond		Jehovah's Witnesses
Mike Caswell (MBE)	Chairperson	Southfields Grid Residents' Association
Mrs Gladys Whigham	Chairperson Wandsworth Branch	Parkinsons Disease Society Wandsworth
Father Drago Berisic		Croatian Centre
	The Minister	East Hill Baptist Church
Fr David Peck	Parish Priest	Church of Our Lady and St Peter
Mike Benner	Chief Executive	Campaign for Real Ale
Charlotte Millar	Senior Planning Officer	Government Office for London
	Head of Planning	London Borough of Hackney
	Minister	Tooting Methodist Church
	Secretary	Putney Labour Party
Lois Robinson	Project Co-ordinator	Share a Family
Rev S J Melluish		St Stephen's C of E Church
John Tallantyre		Department for Culture, Media & Sport
Ms Claire Taor	Secretary	Gwendolen Avenue Residents' Association
Lord Foster		Lord Foster & Partners

Name	Position	Organisation
	Chairman	London Planning & Development Forum
Dave Johnson	Area Manager	Transport for London Street Management
Mr Martin Branston	Principal	Branston & Company Architects
Ms Sylvie Chrzanowska	Co-ordinator	Community Safety Network
Frances Bird	Chairman	Lennox Estate Residents' Association
Mr D L Walker		David L Walker Chartered Surveyors
Marino Cardillo		Ingate Motor Company
	Principal	Ashcroft Technology Academy
	Secretary	Ahmadiyya Muslim Association
Miss Beverley Shillingford	Chairman	Arndale Estate Residents Association
Mr Abbas Choudry		Asian Muslim Community Centre
Mr Anez Jussab	Secretary	Balham Mosque
Martin Ireland		Wandsworth Cyclists
		Bartlett School of Planning
		Behrens Sharp
Mr J Kelly	Secretary	Binley & Winchfield Houses Tenants' Association
Ms Jo Cutler	Planning Manager	National Grid
	Secretary	Black Rights Group
Andrew Pollard		Bonsor Penningtons Commercial
		British Red Cross
		Cable & Wireless
Brenda Puech		Centre for Accessible Environments
Ms Julia Matcham		Chatham Road Residents' Association
Lorinda Freint	Clapham Junction Town Centre Manager	Clapham Junction T C Management Office
P W Rees	City Planning Officer	Corporation of London
		EKAYA Housing Association
Mike Dunton	Town Planning Executive	Tesco Stores Ltd
Miss Shirley Kermer	Chair	Friends of Clapham Common
Mrs Marlene Price		Borough Residents' Forum
	Minister	Evangelical Church of Yahweh
Don Burrows	Chief Executive	Neighbourhoods Initiative Foundation
Denise Davidson	Service Manager	Doddington Resource Centre
		Local Government Association

Name	Position	Organisation
	Planning Policy Team Leader	London Borough of Bromley
London Borough of Camden	Assistant Director, Planning	London Borough of Camden
	Head of Planning and Transportation	London Borough of Hillingdon
		London Borough of Lewisham
Andrea Kitzberger	Planning Policy Manager	London Borough of Richmond
Jo Valentine	Managing Director	London First
		London Historic Parks & Gardens Trust
Janet Cooke	Chief Executive	London TravelWatch
Malcolm Payne		London Underground Ltd
J Irvine	Founder	Pure Package
Mr Naseer Dean	Liaison Officer	London Mosque
Peter Luder		Weston Aviation
Mr Murray Hunter		South West London Health Authority
Donna Alley		London Borough of Tower Hamlets
Mr Mark Broxup	General Manager	Western Riverside Waste Authority
		Long & Co
		Family and Childcare Trust
	Outside Parties Engineer	Network Rail
Nigel Lane		Notting Hill Home Ownership
		Virgin Media
Mr K R Tweed		Ormeley Road Residents' Association
Peter Pendleton		Peter Pendleton Associates
Huw Morris	Editor	Planning
		PRC Fewster Architects
Ms Phillipa Jeal		Primrose Mansions Ltd
		Road Haulage Association
Robert Beeby		Robert Beeby Architects
Mr A Gordon-Walker		Roehampton Quadrant Res. Assoc.
Ms Lalji Vakaria		Saloria Architects
James Miller		Sapcote Property Developers
Mr P Scott		Scotts
		Sheppard Robson
Mr Ian Fairweather		Solid State Design Ltd
Mr Seamus McBride		Solon Design
Mr A R Lone	Manager	South London Islamic Centre

Name	Position	Organisation
Mr John Broughton		St Georges Hospital
Ms Sue Sutton-Smith		Sue Hutton Interior Design
Mr Ian Taylor		Taylor Williams Daley Partnership
Alex Williams		Transport for London
Michael Stephen	Hon. Secretary	Chelsea Society
Lady Berkeley	Chairman	River Thames Society
Ms Natasha Rhoden	Manager	Totteridge House Co-operative Ltd
Rachel Colenso	Secretary	Tunworth Crescent Residents' Association
		Vodafone & O2
Mr Alan Kennedy		Wandsworth Friends of the Earth
Mrs C Albury	Family Support Worker	Wandsworth Mencap
	Director	Wandsworth Mind
Ms Christine Miller		Westside Residents' Association
Mrs Yeldham	Chairman	Bellevue Road Residents Association
Naseem Aboobaker	Co-ordinator	Mushkil Aasaan Project
Simon Hutchins	General Manager	Weston Aviation Ltd
		British Gas plc
Penny Bartrop	WLRG Secretary	West London River Group
Sarah Hoad		Transport for London Land Use Planning
David Hammond	Planning & Advocacy Advisor	Natural England
Tony Mendes		London Fire and Emergency Planning Authority
	The Secretariat	HM Prison Service Headquarters
C Edwards		Inland Waterways Association (London Region)
Tom Bogdanowicz		London Cycling Campaign
	Senior Port Health Officer	London Port Health Authority
Mr Tim Bellenger		London TravelWatch
		Network Rail Infrastructure Limited
		E.ON
Peter Eversden		London Forum of Amenity & Civic Societies
Mr M D Elengorn		Church Commissioners

Name	Position	Organisation
Jamie Colonna		Westside Residents' Association
		PCT
Tara Butler	Spatial Planning	London Borough of Merton
		London Borough of Harrow
Richard Cleminson		Kinleigh Folkard & Hayward
Ms J Leigh		WEF/Putney Society
	Chief Operating Officer	South West London NHS Support Services Partnership
Nicholas Devonald	Committee Member	Southfields Triangle Residents' Association
Trevor Binley	Principal Estate Surveyor	DEFRA
Pamela Butler	Planner	Network Rail
Melanie Francis		Wandsworth Environment Forum
Mr Mark Stevenson	Archaeology Advisor (South London)	Greater London Archaeology Advisory Service
Tim Bergin		London Borough of Croydon
		Empty Homes Agency
		Greater London Enterprise
	HM Principal Inspector	Health & Safety Executive
Mr Gordon Vincent	Chief Executive	Wimbledon and Putney Commons Conservators
Sarah Rackham		Katherine Low Settlement
Mrs J Gibson	Secretary	Westmark Point Residents' Association
Rev Heinz Toller	Vicar	St Paul's Church of England
Scott James	Manager	Anchor Congregational Church
Rev D C Premraj	Minister-in-Charge	All Saints C of E Church
Mr Harold Ellis		All Saints C of E Church
Rev Steve Rouse	Senior Minister	Balham Baptist Church
Mr Athos Mamas	Trustee	Greek Church of St Nectarios
Occupants		Courtney Joyce
Mrs A Harding		Covent Garden Tenants' Association Ltd
Mrs J McKnight		Cyril Mansions Residents' Association
	Valuation Officer	District Valuer Wimbledon
Mariene Farguson	Manager	Doddington & Rollo Community Association
Mr C Jones	Chairman	Du Cane Court Residents' Association
		UK Power Networks (EDF Energy)
Mrs J Buckley	Treasurer	Faylands Area Residents' Association
Doris Leaman	Chair	Felsham Road Co-op Ltd

Name	Position	Organisation
		Freight Transport Association
Jeremy Clyne	Joint Co-ordinator	Friends of the Tooting Commons
David Stanford		Geoffrey Reid Associates
Merial O'Dowd		Georgian Group
Paul Evans		GLE Properties
Giles Dolphin		Greater London Authority
Emma Zvesper	Community Development Worker	Mimosa Women's Support Group
		J C Francis & Partners
Mr Raymond Thomas Gittins		KSP Building Design Consultants Ltd
Rev Angela Rayner		Holy Trinity C of E Church
	Rail Support & Communication	Department for Transport
Mrs Rosemary Irving	Chairman	Plantation Wharf Association
Mr Peter Murphy	Development Director	Barratt West London
Laura Ross		Stewart Ross Associates
		Ancient Monuments Society
Sue Morecroft		Council for British Archaeology
		SPAB
		Victorian Society
		Twentieth Century Society
John Clark	Conservation Officer	Garden History Society
	Chief Executive	St George's Healthcare NHS Trust
		GVA
		National Offender Management Service
c/o King Sturge. FAO James Owens		Metro Shopping Fund LP
		Delancy and Land Securities (Clapham Junction)
		Helical Bar/Lattice Pension Fund (Tideway)
Matthew Bonning-Snook		Helical Bar (Silverthorne Road)
		Wandsworth Riverside Quarter Ltd
Paul Koopman		Sleaford Street Management Company
		George Wimpey City Ltd
John Ewing	Chairman	Putney Society

Name	Position	Organisation
Mr Ken Hosking	Hon. Secretary	Sutherland Grove & Area Residents' Association
Mr James Potter	Chairman	Putney Town Centre Partnership Board
Mr richard lee	Ambulance Operations Manager	London Ambulance Service NHS Trust
Fiona Mackay		Stephan Reinke Architects Limited
Mr Damon Reynolds		Tonsley Residents' Association
Mr John Gould	Senior Partner	Russell-Cooke Solicitors
Mr Derek Scott		Scotts Surveyors
Mr Steve Wood	Development Manager	Workspace Glebe Ltd
Mr Peter Carpenter	Chair	Putney Labour Party
Ms Jo Gay	Senior Planner (Policy)	London Borough of Lambeth
Lucy Owen	Planning Officer	Port of London Authority
Matthew Carpen	Strategic Planner	Greater London Authority
Harvey Heath		Northcote Road Residents' Action Group
Charles Reed	Director	Service Developments Holdings Limited
Lorraine Murphy	Planning Liaison Officer	Environment Agency
Kate Matthews	Assistant Planner	Firstplan
Tony Guthrie	Partner	Drivers Jonas
Claire Craig	Regional Planning Adviser	English Heritage
Tina Jordan	Investment Manager	Housing Corporation
Beverley Butler		Fusion Online Limited
		Battersea Power Station Community Group
Nigel Abbott	Partner	Cluttons LLP
Simon Dodd		European Metal Recycling Limited
Jerome Geoghegan	Group Director, South West Thames Region	London & Quadrant Housing Trust
Stewart Ross		DevPlan
Mr Indrajit Patel	Chair	Tooting Town Centre Partnership Board
Mrs Jackie Coward		Children and Young People's Network
Sarah Banham		Battersea Power Station Development Company
Rev J McKinney		Roehampton Partnership
Mr Peter Twelftree	Technical Director	Steer Davies Gleave

Name	Position	Organisation
Charles Millest		B&Q plc
		Young & Co
		Muzzagam Organisation
		Langdon Investments
		J R Thompson (Chatfield Road)
		Royal College of Art
Nick Pendlebury		Briargrove Ltd (Upper Richmond Rd)
		Southern Properties Ltd (Oyster Wharf)
		Smech Management Company Ltd
		Morrisons Supermarkets PLC
		BP Oil (uk)
		Calor Gas Ltd
Outdoor Advertising Outdoor Advertising	British sign and	Outdoor Advertising Assoc. & British Sign and Graphic Assoc.
David Herring		Rockspring Hanover Property Unit Trust (RHPUT)
Mr Nicholas Thompson	Director	Kingston University
		Anastasia Limited
Seddon		Metro Shopping Fund
Ipcress Limited		Ipcress Limited
Mr Max Whitaker	Commercial Surveyor	Wereldhave
Sainsbury's Supermarkets Ltd		Sainsbury's Supermarkets Ltd
B&Q Plc		B&Q Plc
Jason Larkin		Fairview New Homes Ltd.
		Senex Capital Ltd
		MetroFund LLP
		Curatus Ltd
		Minerva Plc
Nick Sealy		Somerfield Stores Ltd.
mccarthy and stone		McCarthy and Stone UK Ltd
		Co-operative Group food Ltd
Mr Sean Wildman		Fusion Online Limited
Malik Gul		Wandsworth Community Empowerment Network
Mrs Liz Walton		Battersea Society
Ms Margaret Brett		Southfields Grid Residents' Association
Mike Sciberras	Director	MDR Associates

Name	Position	Organisation
Ms Jane Jephcote	Pub Preservation Officer	Campaign for Real Ale SW London Branch
Harriet Strickland		Putney Society
Hugh Thompson		Putney Society
Mr James Stevens	Strategic Planer	Home Builders Federation
Mr M James		Wereldhave Property Management Company Ltd
Mark Mathews	Town Planning Manager	Thames Water Utilities Ltd
David Mcgee		Defence Estates (MOD)
CLlr Nick Bowes		Wandsworth Labour Group
Mr David Devons	Secretary	Victoria Drive Conservation Area Residents Association
Paul Ricketts		Fairview New Homes Ltd.
Ms Helen Cornforth	Environmental Policy Manager	London Borough of Richmond
Mr Huw Williams		Russell-Cooke Solicitors
		Russell-Cooke Solicitors
Mr Tony Kingsley		Putney Partnership Board
Mr Marc Pennick		Barratt Homes Limited
c/o King Sturge. FAO James Owens		Helical Bar and National Grid
Mr Geoff Strawbridge	Pubs Officer	CAMRA SW London
Anastasia Limited		Anastasia Limited
Steve Cardis	Team Leader - Spatial Planning	London Borough of Merton
Philip Whyte	Chairman	Wandsworth Society
Ashley Pollerd	Town Planner	Network Rail
Minerva		Montagu Evans
Jeremy evershed		Montagu Evans
Morrison Supermarkets Plc.		Wm. Morrison Supermarkets Plc.
John Kerr		Shoregate
Berkeley Group Ltd		Berkeley Group Ltd
Richard Alden		National Grid
		REO (Powerstation) Ltd
		Sleaford Street Management Company
		Haywoods Group, The James Laurence Group and Razor Investments Ltd

Name	Position	Organisation
		Frasers Riverside Quarter Ltd
		Central Caspian Holdings
Beverley Green		DP9
London Fire and Emergency Planning		London Fire and Emergency Planning Authority
Hazel Soin-Stanley	Director of Planning, Performance and Strategy	Wandsworth Teaching Primary Care Trust
Mr Steven Rogers		Trust Planning Ltd
Charlotte Amor	Planning Liaison Officer	Environment Agency
Mr Aidan Thatcher		ANA Architecture
Mr Malcolm Souch	Project Director	NHS London Healthy Urban Development Unit (HUDU)
Paul Norman-Brown		NHS Wandsworth
	Planning Policy	London Borough of Barking and Dagenham
Coal Authority		The Coal Authority
Mr Adam Brindle		Brindle Developments
Mr Denny Gray		Wandsworth Environment Forum
Mr Mike Smith		Balham Town Centre Partnership Board
Mr Pete Errington		Home Builders Federation
Mr Chris Pritchard		Planning Inspectorate
Dr Ghazwa Alwani-Starr	Director of Estates and Campus Services	University of Roehampton
Costco Wholesale Uk Limited		Costco Wholesale Uk Limited
Miss Snow		Sainsbury's Stores Ltd
Workspace Glebe		Workspace Glebe
Mr Charles Muriithi	Planning Technical Specialist	Environment Agency
Tom Burke		Metropolitan Police Service
		National Grid
Julie Shanahan	SW London Plans and Casework Officer	Government Office for London
Scott Hammond	Land and Planning Director	Oracle Group
Addition Land Ltd & Network Rail		Addition Land Ltd & Network Rail
Savio Barros	Committee Member	Tonsley Residents' Association

Name	Position	Organisation
Chris James	Spatial Policy Interim Manager	London Borough of Merton
Zurich Assurance Ltd and Princess S		Zurich Assurance Ltd and Princess Securities Ltd
Mr Patrick Blake		Highways England
Mr Carl Banton		Coal Authority
Peabody		Peabody Trust
Ian Dubber		Workspace Group PLC
Mr Jeremy Castle		Treasury Holdings UK, Battersea Power Station
Jabed Rahman		NHS London Healthy Urban Development Unit (HUDU)
TR Property Investment Trust PLC		TR Property Investment Trust PLC
Carmelle Bell	Planning Administrator	Thames Water
Mr David Wilson	Senior Town Planner	Thames Water
Mr Peter Mail		Ballymore Group
CEMEX		CEMEX
Cadent Gas Ltd		Cadent Gas Ltd
Mark Fisher		Lawn Tennis Association
		CBRE
		Investate
	Town Planning Team	Network Rail
Mr Wayne Stutchbury		Curatus Trust (Mauritius) Ltd
		Curatus Trust (Mauritius) Ltd
Mr Andrew Catto	Buildings Panel Convenor	Putney Society
Terry Smith		Trinity Fields Trust
Cyril Richert		Clapham Junction Action Group
	c/o agent	Indigo Planning Ltd
		Peabody Trust
Monica Tross	Sectary to planning committee	Battersea Society
		Linden Homes (Chiltern)
Ballymore Group		Ballymore Group
James Hepburn		St James's Investments & Keltbray Ltd
Ms Sharon Goodridge	Director of Operations	Welcare in Wandsworth

Name	Position	Organisation
Mr F Valimohamed		Balham Mosque
	Rabbi	Wimbledon and District Synagogue
Mr Judge		Local Spiritual Assesmbly of the Baha'is of Wandsworth
Ms Kathleen Hardy		Local Spiritual Assesmbly of the Baha'is of Wandsworth
Madan Singh	Treasurer	Sikh Gurwara
Mr Harpal Rehal		Khalsa Centre
Mr Mohan Singh Dhamrait OBE		Khalsa Centre
Mr Satpal Singh Rayit		Khalsa Centre
Mr Prem Dhall		Hindu Society
Mrs Latif Khan		WISH
Venerable Phrakru Samu Lom		Buddapadipa Temple
Rev David Gillman		Battersea Methodist Mission
Helen Simmons	Chief Executive	Nightingale Hammerson
Father David Stanley		St Vincent de Paul Presbytery
Inspector L Strong		Battersea Police
		London Borough of Enfield
Mr Hiu-Ching Pun	Planning Assistant	SITA UK
Mr Jim Grundy	Director of Art Operations	Gander & White Shipping Ltd
Ben Addy	Project Officer	Sustrans
Westley Pickup		Walsh
		Kish Six Ltd
	Agent	Brooksplace PLC
Judith Roscoe	BID coordinator	Garratt Business Park
Mrs Patricia Poulter		Ernshaw Place Residents' Association
		Workspace Group Plc
Mr David Guyan	Chairman	Mr Carpet Ltd
Mrs Susan Houlding	Director	Boldfort Ltd
Mr Jonathan Wade	Planning Officer	RB Kensington & Chelsea
	Planner	tp bennett
		Barrowfen Properties Ltd

Name	Position	Organisation
Mr Nicholas Moll	Managing Director	Ludo Press
Mr Didier Ryan		Diamond Conservation Area and Heathbrook Park Residents
Lammas Motors		Lammas Motors
		Bupa
		St. Georges Hospital
		South Thames College
	c/o agent	Sleaford Street Management Company Ltd
Simon Vince	Safeguarding Manager	Heathrow Airport Limited
Resinvest IOM Two Limited		Resinvest IOM Two Limited
Akzo Nobel (CPS) Pension Scheme		Akzo Nobel (CPS) Pension Scheme
Barbara lascelles		Lascelles Antiques
Senior Planner Eileen McCarthy		London Borough of Lambeth
	London Boroughs Biodiversity Action Plan Co-ordinator	London Biodiversity Partnership
Stargas Nominees Limited		Stargas Nominees Limited
Karen Jones	Partner, Planning & Sustainability	CgMs
Mr Michael Bryn-Jones	Unknow	St George (South London) Ltd
Carolyn McMillan	Secretary	Putney Society
Mr Andrew Simpson	Planning Director	South West London and St George's Mental Health NHS Trust
Rachel Fleming-Mulford	Programme Co-ordinator	Art in the Open
Emma Andrews		Federal Express Inc (FEDEX)
Ms Karen Miller	Chief Executive	Trident Business Centre
		Royal Mail Group
South London Land & The Haywoods Gr		South London Land & The Haywoods Group
Mr Jamie Hamilton	director	Hamilton Ice Sculptors
Dr Bella Davies	Development Officer	Wandle Trust
Steve Austin		Network Rail

Name	Position	Organisation
Fleur Anderson MP	Labour's Parliamentary candidate for Putney, Roehampton and Southfields	Labour Party
		Her Majesty's Court Service
Graham Mackenzie		Wandsworth Clinical Commissioning Group
		Eclipse Hotels
Mr Mark Kelly	Project Planner	CEMEX
Department of Health		Department of Health
Cappagh		Cappagh
Oak Trading Ltd		Oak Trading Ltd
Conal Stewart	Planning Manager	Sport England London Region
		Putney Town Centre Partnership Board
Mr Mark Poulter	Deputy Buildings Panel Convenor	Putney Society
Mr Martin Bridgman		MHCLG
Mr Peter West		Sutherland Grove & Area Residents' Association
Mr Rodney Gillett	Chairman	Riverside Plaza Residents' Association
		Campaign to Protect Rural England (CPRE)
		B&Q
Mrs Sue Rolfe		Werter Road Residents
Lookers		Lookers
		Network Rail
Mr Justin Kenworthy		Barton Willmore
		Covent Garden Market Authority
		D P 9
Mr Martin Kirvan		Sutherland Grove & Area Residents' Association
Mr Nigel Garrett	Agent	Hives
Orchid (Putney) Limited		Orchid (Putney) Limited
		Tileman House Investments (Putney) Ltd
Royal Mail Group Limited		Royal Mail Group Limited

Name	Position	Organisation
Threadneedle Property Investments a		Threadneedle Property Investments and Prices Securities Ltd
OCS Group UK Limited		OCS Group UK Limited
St James Group		St James Group
Kent County Council		Kent Council Council
		Barclays Bank PLC
		Natural England
Peter Mercer		National Federation of Gypsy Liason Groups
Jason Larkin	Planning Manager	Canary Wharf Group PLC
Miss Ruth Cunningham		TfL
		TfL Consents & Environment
Darren Carroll	Assistant	City Designer
Ms Rida Nicholson	Chair	Wandsworth Access Association
Rebecca Rogers		Planning Potential Ltd
Mrs Diana Beattie	Director	Heritage of London Trust
Angela Gemmill	Stakeholder & Networks Officer	Marine Management Organisation
		Wandsworth Chamber of Commerce
Alan Vinall	Delivery Lead Planning Strategy & Policy	London Borough of Lambeth
Sandra Roebuck		London Borough of Lambeth
		Office of Rail Regulation
James Asfa		London Citizens
Mr David Raz	Treasurer	Westrow Residents' Association
Ms Anna D'Arcy	Public Health Dietitian	NHS Wandsworth
Terry Begley		Corby Borough Council
Goldcrest Land		Goldcrest Land
Simon Ryan	Town Planning Manager	Ballymore Group
Dale Greetham	Planner	Sport England
Mr Jamie Melvin	Land Use Operations Team	Natural England
Lorraine Sweeney	Joint Chief Executive	London Gypsy and Traveller Unit
Vinci St Modwen		Vinci St Modwen
Simon Lewis	Planning Manager	St James Group
VSM Estates		VSM Estates
Darren Munro	Borough Commander	London Fire Brigade

Name	Position	Organisation
Sue Morgan	Chief Executive	Wandle Valley Regional Park Trust
Miss Ilinca Diaconescu	Planning Policy	London Gypsies and Travellers Unit
Minerva/Delancey		Minerva/Delancey
Emma Penson		Dalton Warner Davis LLP
Battersea Project Land Company Limi		Battersea Project Land Company Limited (BPLCL)
One Housing Group		One Housing Group
Gordon Adams	Head of Planning	Battersea Power Station Development Company
Viridian Housing		Viridian Housing
Lucie Waters	Director of Commissioning and Planning	Wandsworth Clinical Commissioning Group
Libby Lawson		Tooting History Group
Stephen Foster	Major Connections South Manager	UK Power Networks
	Client	Workspace Group Plc
Barratt London Ltd		Barratt London Ltd
	& the Callington Trust	Callington Estates Ltd
Mrs Sarah Holland	Planning Manager	Cory Environmental Ltd
Patrick Ryder		Highways England
		Kinley Financial Inc
David Irwin		Living Streets (Wandsworth Branch)
Shahina Inayathusein		London Underground Ltd
Revd Helen Matthews	Minister of Group	SW London Group of United Reformed Churches
Mayor's Office for Policing and Cri		Mayor's Office for Policing and Crime (MOPAC)
Viv Taylor Gee		Northcote Books
Sir Terence Clark	Chairman	Residents of 25-37 Westleigh Avenue Committee
Simon Millett	Assistant Planner	Sport England
Taylor Wimpey		Taylor Wimpey
Taylor Wimpey & Addition Land Ltd		Taylor Wimpey & Addition Land Ltd

Name	Position	Organisation
Vinci St Modwen & Convent Garden Ma		Vinci St Modwen & Convent Garden Market Authority
Sir Terence Clark	Chairman	Residents of 25-39 Westleigh Avenue Committee
Martin Jones		Greater London Authority
Mr Oliver Mitchell		Planware
Tom Bowkett		Sport England
		Transport for London
Suzanne Parkes	Principal Planning Officer (Strategy & Policy)	Elmbridge Borough Council
Rev Canon Geoff Vevers	Vicar	Parish of Battersea Fields
The Venerable Simon Gates	Archdeacon of Lambeth	Southwark Anglican Diocese
Mr Tom Clarke	National Planning Adviser	The Theatres Trust
Beverley Bateman		Firstplan
Steve Burgin	Chair	Wandsworth Town Centre Partnership
Anne Partridge	Chair	Putney Town Centre Partnership Board
Georgina Ivor	Co-chair	Balham Town Centre Partnership Board
Nick Samuel	Co-chair	Balham Town Centre Partnership Board
Steve Taylor		Network Rail
Mark Behrendt		Elmbridge Borough Council
Mr James Aldred		Wandsworth Council
John Moran		Health & Safety Executive
Mr Sean McGrath	Director	Indigo Planning Ltd
Mr Peter Dowling	Associate	Indigo Planning Ltd
Tom Linscott		The British Land Company PLC
Mr Mike Lane		NHS Wandsworth
KFC (GB) Limited		KFC (GB) Limited
Linden Homes		Linden Homes
Coral Racing Limited		Coral Racing Limited
Andrew Maunder		Ponton Road LLP
McDonalds PLC		McDonalds PLC
Ms Carly Cudmore	Planning Specialist (Major Projects - South London)	Environment Agency
Ms Barbara Barnes		Highways England

Name	Position	Organisation
Ms Catherine Whyte	Planning Officer	Port of London Authority
Mr Ross Anthony		The Theatres Trust
McDonald's Restaurants Ltd	Agent	McDonald's Restaurants Ltd
A2 Dominion		A2 Dominion
Balham Properties LLP		Balham Properties LLP
Mr Richard McEllistrum	Principal Planner	Transport for London
Mr Andrew Watson		Big Yellow Self Storage Company Ltd
Katharine Fletcher	Historic Environment Planning Advisor	Historic England
Mr Stewart Murray	Assistant Director-Planning	Greater London Authority
Mr Matthew Wilcock	Planning Advisor	Environment Agency
Kayleigh Wyatt	Planning Advisor	Environment Agency
Mr Joe Martyn	Planning Advisor	Environment Agency
Mr Colin Molyneux		Molyneux Investments Ltd
Joanne Capper		London Borough of Richmond
		NHS Property Services Ltd
		Civil Aviation Authority
John Lett	Strategic Planning Manager	Greater London Authority
	Head of Planning Policy	Tandridge District Council
Rachel Botcherby	Planning Adviser	National Trust
Mr David English	Historic Places Advisor	Historic England
		Historic England
Lois Davis	Co-ordinator	Wandsworth Green Party
Mr Hutchins Simon	Heliport Manager	The London Heliport Ltd
MR ROB P	Director	Nexus Planning
Kathy Lowe	Knowledge Development Lawyer	Berwin Leighton Paisner LLP
Mr ray guy	Chair of the Conservation committee	Dover House Estate Residents Association
Amec Staff Pensions Trustee Limited		Amec Staff Pensions Trustee Limited

Name	Position	Organisation
Nick Pendlebury		Ipsus Ltd
		Safestore Ltd and Fraser & Ellis Ltd
Duncan Sambrook	Managing Director	Sambrook's Brewery Ltd
Christian Siddell		Candlemakers management co. Ltd
Cllr Rory O'Broin		St Mary's Park Ward Councillors
Hilary Jennings		Transition Tooting
		Highways England
Catherine Carpenter	Principal Planning Policy Officer	London Borough of Lambeth
Piotr Behnke	Sustainable Development and Regulation	Natural England
Office Estates Ltd		Office Estates Ltd
travis perkins		Travis Perkins (Properties) Ltd
Clayton Fussell		Wandsworth Green Party
Esther Obiri-Darko		Wandsworth Green Party
Peter Farrow		Wandsworth Society
Sandy Kidd		Historic England (GLAAS)
Henry Parker		BT Group
Jane Evans		Three
Mr Andrew Harrison	Director	Harrison Architects + Designers Ltd
Andrew Wills	Coordinator	Wandsworth Tree Warden Network
	N/a	Big Yellow Self Storage Company Ltd
Riette Oosthuizen		HTA Design LLP
		X
		Ipsus Developments Ltd
		Callington estates Ltd
Mr Mark Poulter	Deputy Buildings Panel Convenor	Putney Society
		Furzedown Community Network
		Sutherland Grove & Area Residents' Association
Dr Nick Steiner	Chairman	Friends of Wimbledon Park
Ellen Hudspith	Policy & Research Officer	Campaign for Real Ale
Generator Developments LLP		Generator Developments LLP
Laura Kelly		National Grid

Name	Position	Organisation
Panorama Antennas		Panorama Antennas Ltd
David Penniston	Property Director	Safestore Ltd
Schroders		Schroders Real Estate Investment Management
St William Homes		St William Homes
Steve Pinto	Chief Executive	Wandsworth Chamber of Commerce
Workspace Group		Workspace Group PLC
38 Havelock Terrace Ltd		38 Havelock Terrace Ltd
Andrew Cox	Property Director	Young & Co's Brewery
Lucy Bird	Head of Planning	St William Homes LLP
Vernon Herbert	Director	NHS London Healthy Urban Development Unit (HUDU)
Charterhouse Property Group		Charterhouse Property Group
Eleanor Byrne	Area Manager South London	Greater London Authority
Rebecca Sladen		TfL Commercial Development
Mr Simon Ffoulkes	Parks	Wandsworth Council
Fodor Eszter		Atelier Kite
Battersea Parkview Ltd		Battersea Parkview Ltd
Innova Investments Partnership		Innova Investments Partnership
Kingston University		Kingston University
Adrian Toolan		Network Rail
Tim Kelly	Director	S G Capital Group Limited
Adam Price		Transport for London (Commercial Development)
Andrew Dorrian	Principal Planner	Transport for London
Bernard Construction UK		Bernard Construction UK LLP
Mark Smith	Development and Technical Director	London Square
		Tooting Neighbourhood Forum
Mr Peter Carpenter		Putney Labour Party
		Western Riverside Waste Authority

Name	Position	Organisation
Rachel Wang	Director	Chocolate Films Ltd
Duncan Smith	Artistic Director	Association for Cultural Advancement through Visual Art (ACAVA)
Gavin Scillitoe	Managing Director	BAF Graphics
		South Western Estates Ltd
Sophie Lancaster	Relationship Manager	Arts Council England
Marcia Gillings	Strategic Property Manager	Wandsworth Council
Harriet Finney	Interim CEO	Creative Industries Federation
Susie Gray	Cultural Planning Manager	Enable Arts
Rockspring Property		Rockspring Property Investment Managers
David Jubb	Artistic Director and CEO	Battersea Arts Centre
London Borough of Hammersmith & Ful		London Borough of Hammersmith & Fulham
City Of Westminster		City of Westminster
Liz Wood-Griffiths	Head of Consents Authority	Tideway
Gemma Lloyd		Love Art
Lend Lease		Lendlease
Andrew Maunder	Senior Design & Planning Manager	London & Quadrant Housing Association
		Tooting Development Company
Ms Rachel Smalley	Principal Advisor- Access and Inclusion	Greater London Authority
Ms Allan Kate		Balham and Tooting Community Association
Alison Chippendale	CEMHD5 Admin	Health & Safety Executive
Emma Conwell	Assistant Planner	Iceni Projects
Ms Polly Barker		TfL Commercial Development
Mr Andree Gregory		Highways England
Juliemma McLoughlin		Greater London Authority
Caroline Steenberg		London Borough of Richmond
Charles Wates		Needspace?
		Big Yellow Self Storage Company Ltd

Name	Position	Organisation
	& the Callington Trust	Callington Estates Ltd
		Hollybrook Ltd
		Style and Space Contractors Limited
Lydia Investment Holdings		Chelsea Cars and Kwikfit
Legal and General Property Partners		Legal & General Property Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial) Nominees Limited
Louise Newman	Director	Tavernor Consultancy
matthew Banks	Consents officer	National Grid
Nicola Brownbridge		National Grid
Simon Wood		
Metropolitan Police Service		Metropolitan Police Service
Adam Shepherd		Savills
Alan Piper	Director	Alan Piper Consultancy
Natalie Chan		TfL
Frances Devane	Executive Officer	Western Riverside Waste Authority
Sinead Loftus		Chocolate Films Ltd
Mr Mike Potter	Officer	Tooting Bec & Broadway Neighbourhood Forum
Linda Beard	Principal Planning Policy Officer	Barking and Dagenham
Nicola Grant Nicola Grant		Positively Putney
Katie Parsons	Historic Environment Planning Adviser	Historic England
Mrs Melanie Murphy	Director of Marketing and Communications	Royal Academy of Dance
Sarah Wilks	strategic transport infrastructure and service provider	TfL
evelyn Jones	Town Planner	NHS Property Services
Michael Atkins	Senior Planning Officer	Port of London Authority
jack conroy	Assistant Planner	TfL Commercial Development
Celeste Giusti	Principal Strategic Planner	GLA
Vicky Aston	Planning Manager	Sport England
Lucy Lewis	Head of Estates, Merton & Wandsworth CCGs	clinical commissioning group

Name	Position	Organisation
simon ingyon	Executive Director Parks and Leisure	Enable Leisure and Culture
Mary Manuel		NHS London Healthy Urban Development Unit
Battersea Society		Battersea Society
Mark Batten	director	Quartet Architecture
Azzees Minott	Area Manager (SouthTeam)	GLA - housing & Land
Cllr Graeme Henderson	Cllr	Earlsfield Labour Party
Labour Group		Labour Group
Mike Langworth	Head of Asset Redevelopment and Release	Livability
Mr James Thompson	Director	Northport FPR Limited
Ruby Wilkinson	Planner	Carter Jonas
Jack Dewey		Wildstone Planning
Andrew Ryley	Director of Planning	DLBP Ltd
Richard Taube	Director of Design & Construction	south coast estates
Charlotte Williams	Assistant Planner	Quod
Armin Shokravy		London Heritage Properties
Mr Philip Whyte	Leader planning group	Wandsworth Society
Matthew Gore	Director	CBRE
Sarah Temple	Senior Planner	Land Use
HGH Consulting		HGH consulting
Henry Asson	Town Planner	Rapleys
Charles Rose		City Planning
Tabitha Lythe	Assistant Director	Deloitte LLP
Richard Katz	Senior Planner	Deloitte LLP
Cerys hulbert	Planner	Deloitte LLP
Belinda Sosinowicz		Age Exchange
Melanie Getty McManus		Aurora Project Wordsworth
Aira Temporal	Planner	Montagu Evans
Matthew Pigott	Senior Planner	Avison Young
Laura Jenkinson	Planner	Avison Young
Oliver Froy	Planner	Avison Young
		50 Plus Restart

Name	Position	Organisation
		Youth Offending Team
		Yahweh Christian Fellowship
		World Heart Beat Music Academy
Senia Dedic		Women of Wandsworth
		Wilditch Community Centre
		Westside Youth Club
		c.street@wandsworthmind.org.uk
		Wandsworth Learning Disabilities Network
		Wandsworth Hearing Support Service
		Wandsworth Foodbank
Peter Hapgood		Wandsworth District Scouts
		Wandsworth Community Transport
		Wandsworth Community Chaplaincy Trust
		Wandsworth Common WI
		Wandsworth Carers' Centre
		Wandsworth Bereavement Service
		Wandsworth Asian Women's Association
		Wandsworth Asian Community Centre
Helen Bell		Venue Community Centre
		Turning Point
		Tooting Graveney Day Care Centre
		Tooting and Balham Sea Cadets
		Toland Square Community Clubroom
		Thrive Battersea
		Theatre 503
		The Hope for Wellbeing
		The GAP Youth Club
Jatinder Verma	Director	Tara Arts
Jean Stanley		SWS School of Music
		Supporting Relationships and Families
Louise Simms		STORM Family Centre
		St. Mary & St. John the Divine Balham
		St. Jude's Balham
Sue Clarke	Vicar	St Paul's Furzedown
		St Nicholas Church Tooting
		St Michael's Battersea
		St Mary's Church Summerstown

Name	Position	Organisation	
Charlie Ryder		St Mary Magdalene Wandsworth Common	
		St Margaret's Church	
		St Luke's Church	
		St John's Methodist Church Wandsworth	
		St John's Hill Centre	
		St James West Streatham	
		St Barnabas Clapham Common	
		St Anne's Church Wandsworth	
		St Andrew's Church Earlsfield	
		St Albans Streatham	
		Sprout Arts	
	Lynette Shanbury		Spare Tyre Theatre
			Southmead Children's Centre
Louise Raven-Tiemele		Southfields Sings	
		South London Refugee Association	
		South London Islamic Centre	
		South London Day Centre	
		Sound Minds	
Annie McDowall		Share Community	
Annaliese Boucher		info@sentalk.org	
Kitty Martin		Secret Platform Theatre Company	
		ScarioFunk	
		Safe Ground	
		Run Together	
		Roehampton Outdoor Art Movement	
		Roehampton Methodist Church	
		Roehampton Limb User Group	
		Riverside Radio	
		Rethink Mental Illness	
		Regenerate	
	Frank Colley		Randall Close Day Centre
		Putney Girlguiding	
Veroika Wilson		Putney Arts Theatre	
Ivan Thorley		Puppets with Guts	
		Puntery Wellbeing Friends	
Esther Clevely		Providence House	
		Pocklington Court	

Name	Position	Organisation
		PLOS Theatre Company
		Phoenix Access for all Disabilities
		Penfold Centre
		Paul's Cancer Support Centre
		Parkinson's UK - Wandsworth
Mr Will Olmi		One Trust
Inma Goodhew		The old school club
		Oily Cart
Emilia Teglia		Odd Eyes Theatre
		New Testament Assembly
		New Stagers
		Neighbourhood Network SW12 & SW17
		Missing People UK
Ingrid Barnes		The Mini Cooking Club
		Mind - Wandsworth Men's Shed
B Hudson		London Sustainability Exchange
		London Recumbents
		Leonard Cheshire
		Learn to Love to Read
		Kairos Centre
		Jumping Jack Play Caf��
		John Morris House Community Centre
		Islamic Culture and Education Centre
David Guyan		Garratt Business Park
		Homeless, Refugee and Asylum Seeking Services
Mr Paul Watson		Phillips Planning Service
Gillian Nicks	Associate Director	CBRE Ltd
Mr Toby Hopkins	WCC Co-Ordinator	Wandsworth Cycling Campaign
Mr Mike Grahn		Wandsworth Cycling Campaign
		Balham Society
Caroline Julian	Head of Policy and Public Affairs	Creative Industries Federation
Mohamed Essa		Greater London Authority
Garry Pepe	Counter Terrorism Security Advisor (Met Police)	Met Police
Tony Burton		Wandle Valley Forum
Mr dennis austin	Director	daab design architects
H Monger	Director	London Historic Parks and Gardens Trust

Name	Position	Organisation
Emma Broadbent	London Rivers Officer	South East Rivers Trust
Josephine Vos		Transport for London
Laura Hutson		Sport England
Ms Lauren Miller	Development Planning Team Leader	London Borough of Havering
Ms Helen Oakerbee	Assistant Director of Planning	London Borough of Havering
Steve Diamond	Head of Employment and Enterprise Strategy	LBW Economic Development Office
Brian Albuquerque	Tooting Town Centre Manager	LBW Economic Development Office
Mark Hunter	Head of Strategic Developments	LBW Strategic Developments
Ilias Drivylas	Project Manager	AECOM
Jon Howells	Project Director	AECOM
Jake Billington	Senior Consultant	AECOM
Robert East Robert East	Senior Planning Policy Officer	LB Lambeth
Rob McNicol	Policy Team Leader (Economy, Culture & Social Infrastructure)	GLA
Hassan Ahmed Hassan Ahmed		GLA
Giorgio Wetzl	Senior Strategic Planner	GLA
Guy Bridger	Director (Battersea Park Businesses)	Battersea Parks Business Association
Molly Morris		Savills
Sara O'Donnell	Head of Arts	LBW Arts and Culture
Simon Rogers		Montagu Evans
Grant Leggett	Director	Boyer Planning
Misha Stavrides		Stephan Reinke Architects Limited
Christian Kortlang		Martson Properties
Caroline Marston		Martson Properties
Planning Policy, RBKC	Planning Policy	Royal Borough of Kensington and Chelsea
Mr Michael Priaulx		Swifts Local Network: Swifts & Planning Group
Jake Ash	Graduate Planner	Savills
Zakiya Campbell		University of Roehampton
Mr Ben Wrighton	Strategic Planning Director	Watkin Jones Group

Name	Position	Organisation
Preeti Gulati Tyagi	Team Leader Spatial Planning	RB Kensington & Chelsea
		Western Riverside Waste Authority (WRWA)
Mrs Cleo Kenington	Lead	St George's Hospital Bicycle Users Group
		Wandsworth Cycling (London Cycling Campaign)
Mr Andrew MacMillan		Wandsworth Living Streets
		C B R E
Mr Tom MRTPI	National Planning Adviser	Theatres Trust
Jean Millar		Beautify Balham
Mr Robert Arguile	Chair	The Putney Society
Libby Lawson		Tooting History Group
Lucinda Robinson		Marine Management Organisation
Clare Graham	Chair of Open Spaces Committee	Battersea Society
A C McCarthy		Pimlico Forum
Mr Angus Robertson	member	Alton Action
Ms Bridget Fox	Regional External Affairs Officer (South East)	The Woodland Trust
Ms Jean Millar	Founder	Beautify Balham
Steve Kersley		Spencer Cricket
Councillor Graham Loveland		Labour Group
Susie Morrow	Chair	Wandsworth Living Streets
Roz Lloyd-Williams	Executive BID Director	The Junction BID
Mr Graham Barrett		Protean Developments
Andrew and Anya Vickers		LB Wandsworth
Cllr Aydin Dikerdem		LB Wandsworth
Cllr Mike Ryder		LB Wandsworth
Mrs Celia Scott		Dolphin Square Preservation Society
Jane Briginshaw	Chair	Tooting Bec and Broadway Neighbourhood Forum
Mr Philip Robin	consultant	JLL

Name	Position	Organisation
AJDK		AJDK
Tony Hambro		St George's Sq Residents' Association
Spencer Barnshaw	Secretary	Battersea and Wandsworth Trades Union Council
Audrey Julienn		RATPDev
Greystar Europe Holdings Ltd,		GreystarEurope Holdings Ltd,
Dr David Curran		Lavender Hill for Me
Ms Janet Kidner	Development Director	Landsec
Royal Borough of Kensington and Chelsea Pension Fund		RBKC Pension Fund
Stuart Gulliver		Albion Riverside
DTZ Investment Management Limited		DTZ Investment Management Limited
Riccardo Composto		Tooting Healthy Streets
Mr Joe Palmer	Chief Executive	AFC Wimbledon
John Turner	Associate	Ballymore Group
Dr Stephen Bieniek		Wandsworth Liberal Democrats
Patrick Grincell		HGH consulting
Chris Girdham	Development Director	Cory Riverside Energy
Ian Harrison	Director	Downing
Rebecca Skinner		Peabody and Mount Anvil
Mr Christopher Hayhurst	Development Project Manager	Wandsworth Borough Council: Housing Strategy and Development
Julia Raeburn		Sutherland Grove Conservation Area Residents Association
Diana McCann	Boroughs Coordinator	The Blue Green Economy
Asda		Asda
The Arch Company		The Arch Company
University of Roehampton		University of Roehampton
Terence Brown	Coordinator	Wandsworth Friends of the Earth
L Cox		Pimlico FREDA
Isabella Jack	Sustainable Development Advisor	Natural England
Rachel Holmes	Planning Advisor	Environment Agency

Name	Position	Organisation
Spencer Jefferies	Town Planner	National Grid
Chelsea Cars		Chelsea Cars
Ms Alexandra Milne	Director	DP9
Office for Nuclear Regulation		Office for Nuclear Regulation
Alice Hawkins	Planner	Turley Associates
Mr guy bransbury	Partner	Montagu Evans LLP
Simon Wojtowicz	Associate	Hurlington Capital Ltd
Retirement Housing Consortium		Retirement Housing Consortium
LEAP Secretariat		LEAP
Mr Ben young	associate	bloomfields
Katie Brown	Development Planning Manager	Network Rail
mr vincent gabbe	Consultant	Knight Frank
Ms Niamh Burke		carter jonas
Mr Ben Dakin	planner	ROK planning
Mike Crippin	Club Treasurer	Wimbledon Park Rifle Club.
Deb Roberts	Planning & Development Manager	The Coal Authority
Chris Ridout	Assistant Planner	TfL Commercial Development
Ms Valerie Selby		Enable
Balham Society		Balham Society
Valor Real Estate Partners LLP		Valor Real Estate Partners LLP
Arnaud Masson		RATPDev
Mike Pendock		Tarmac Trading Ltd
Downing		Downing
Ross Newby		Spencer Club
mr Jamie Dempster		ROK planning
Edward Cox		Save Our Balham
mr James Halls		squires planning
Mr Daniel Fleet		Transport for London Commercial Development planning
Mr Tarun Cheema		Centroplan
St George South London Ltd		St George South London Ltd
Peter May	Assistant Spatial Planner	National Highways
Will Everson	Associate Town Planner	NHS Property Services Ltd

Name	Position	Organisation
Phil Kapur	Sales and Development Director	Henley Construction Ltd
Phoebe Juggins	Property Planning Lead	Thames Water Utilities Ltd
Mrs Dinny Shaw	Planning Director	VSM (NSGM) Ltd
Zach Croft	Development Planner	Network Rail
Pocket Living		Pocket Living
Ms Sophia Rainsford		Simply Planning Ltd
Nina Miles		GLA
Wandsworth Bereavement Service	Office	Wandsworth Bereavement Service
Miss Ellie Fowler		HGH consulting
ms Lucy Hale	Senior Planner	Gerald Eve
ms Monica Jain		Greater London Authority
miss Suzy Crawford		DP9 Planning
Highways England		Highways England
Mark Dodgson		Balham Society
Nicholas Petridis	Landscape Planning & Engagement Coordinator	London Parks and Gardens Trust
mr Sebastian Budner	Chair	Wimbledon Stadia Peabody Residents Association

Appendix 1B : List of respondents

First Name	Surname	Position	Organisation
Tasneem	Abdulla	Director	Blue Gecko Architecture
P	Adamczyk	architect	frontline
cynthia	Adu-Ameyaw		
Rajiv	Agarwalla		
Sam	Ahmed	Director	Saam investments
Mohamed	Ali		
Sajid	Ali	Prime Group	Prime Group
Celina	Ammar		
Taylor	Andrews		SGN Mitheridge Ltd
Vicky	Aston	Planning Manager	Sport England
Michael	Atkins	Senior Planner	Port of London Authority
Andrew	Austen		
Dennis	Austin	daab design Architects	daab design Architects
Dennis	Austin	co-founder	Battersea Untangled
Marc	Avis	Director	Avis Appleton & Associates Ltd
Andrew	Badrudin	Director of Investment & Development	London Property Holdings Limited
Sam	Ball		
Rose	Barker		
Mark	Barocas	Founder and Director	Nutbrook Development Group Ltd
Battersea Society	Battersea Society		Battersea Society
Daniel	Batterton	Head of Residential Investment	Legal & General
Mark	Belsham	Director	Eddisons
Jonathan	Blathwayt		Greater London Authority
Gavin	Bradley	Southgold Limited	Southgold Limited
Mark	Breen	Chairman	Artesian Property Partnership
Richard	Breen	Director	Dallington properties ltd
Mark	Breen		
Moses	Breuer	Director	E18 estates Limited
Darryl	Broughton	Ditrector	Pad 365 limited
Harry	Brunt	Director	Lightbox
Richard	Buxton		
Hyacynth	Cabiles		NHS Property Services Ltd
Andrew	Caracciolo	property developer	Property devel
Richard	Carr		Transport for London
Sarah	Chapman	Advocacy and Communications Manager	Wandsworth Foodbank
Mustaque	Choudhury		
Edward	Church		London Heritage Properties

Appendix 1B : List of respondents

Nigel	Coleman	Director	Oakman Architecture Ltd
Michael	Collins	Goldcrest Custom Homes Ltd	Goldcrest Custom Homes Ltd
Ailish	Collins		Rolfe Judd Planning obo Downing
Ahmed	Collins	Director	Goldcrest Land
Jonathan	Collyear		
nathan	cooke	Head of operations	Silvercrow Ltd
Julian	Cookson	Director	FOLIO
Tim	Costin		The Cherwell Group
Suzy	Crawford		BPSDC
Dionne	Davidson		Aja parent power group
Nicholas	Davidson		
Justin	Davies		
Lucien	Davis	CRAFT WORKS SURREY LTD	CRAFT WORKS SURREY LTD
Jon	Davis	Land Director	IndigoScott
Aydin	Dikerdem		
Greg	Dowden		Hotham Mews Holdings Ltd
Michael	Doyle		
Marcus	Dreike		
brian	drewery	director	drewery property ltd
Guy	Duder	Director	Porthminster Ltd
Charlie	Edwards	Bells Chartered Surveyors	Bells Chartered Surveyors
Tom	Elder	Caerus Developments	Caerus Developments
John	Elkington		
Simon	Ellis	CEO	Jem
Chris	Ellis	Nutbrook Property	Nutbrook Development Group
Mark	Eynon	MJE Properties Ltd	MJE Properties Ltd
Thomas	Fairley		
I C	Faithfull	Director	Faithfull Architects
Antonio	Fidalgo		
Antonio	Fidalgo		
Steve	Fidgett		Caddick Group
Sarah-Jane	Field	Communications manager	Convent Co-operative (Housing)
James	Fownes		
Peter	Friend		HNF Property
Daniel	Gabbay		
Alan	Ganesh		
Echedey	García Méndez		ROS GROUP PROPERTY SOLUTIONS
Shirin	Georgiani		
Stephen	Gibbons		
Alex	Goble		

Appendix 1B : List of respondents

David	Goldsworthy		
Jon David	Grainger	ASSOCIATE	AVIS APPLETON & ASSOCIATES
Mark	Gretason		
Chris	Gwilliam	Regional Director	Earlwood Homes
Ollie	Hacon	Architectural Assistant	Avis Appleton & Associates Ltd.
Charles	Hardwick		
Chloe	Harrison		
Nouman	Hashmi		
Alice	Hawkins		Turley obo VSM (NCGM) Ltd
Edmund	Hewitt		
michael	hewitt		
james	hicks	managing director	Paradian Ltd
Sam	Hill		
sam	hillman	director	beam investments ltd
Spencer	Hirst		
Roger	Hodgson	Director	Sanford Developments
Philip	Hoodless		
James	Hope	partner	R & J partners
Peter	Hopkin	Director	Pad Pad Limited
Richard	Hughes	Director	
David	Huxley	Director	Huxley Land Ltd
Stella	Idowu-Ossei		
Shakeer	Idris		
Mahomed Foorqan	Ismail		
Nadine	James		Barratt London
Bob	Jandoo	Fco	Pmp Ltd
Adele	Jeavons	Accountant	
Roger	Jelley	Senior consultant	Aspen homes ltd
Sharon	Jenkins		Natural England
B	Jennings		
Max	Johnson		
billy	kenneally		kendon developments llp rookstone
Alia	Khan		Habinteg
Michal	Komirski		
Christian	Kortlang	Land & Development Manager	Marston Properties Ltd
Shikha	Kumar	Doctor	NHS
Dominic	Lambrecht	Director	Indigo Ridge Developments Ltd
Luke	Lanigan		
Tom	Lawson		Ballymore Group
Christine	Lee		

Appendix 1B : List of respondents

Lee	Levett		
Edward	Ledwidge		Angle Property (York Road) Ltd
Edward	Ledwidge		Brooks Court Management Company
Edward	Ledwidge		Owners of No.2, 3, 4, 5, 6, 7, 8, 9 and 10 Brooks Court
Chue	Li	Commercial property consultant	
Paul	Lintott		Lintott Property Limited t/a Lintott & Company
Larry	Lipman	SAFESTAY	SAFESTAY
James	Lloyd		
William	Lock	Director	Pin Projects Ltd
Tony	Loizou		
Nick	London		
Christophe r	Long	Owner	Long & Co
David	M	Developer	Rc homes
Alex	Macaulay		
Antonia	MacDougall		Quod
Soraya	Maudarbo cus		
Hugh	Meddings		
Michael	Mike		
Nida	Mohiyuddin		
James	Moorhouse	Managing Director - surveyor	JM Commercial Ltd
Valerie	Mowah		Merton Borough Council
Liam	Naldrett	Director	Laurels
Kim	Neville		
Diana	Ngobi		National Highways
Rupert	Nicholson	Director	Rampton Baseley
Andrew	Nissim		
Jack	Norton	Surveyor	
Barry	O'Donnell		
Elizabeth	Oddono	Director	Oddono's
Rizwan	Osman		
ADEM	OZTURK		
Katie	Parsons		Historic England
Sachin	Patel		
Jitendra	Patel	Director	COLBY DEVELOPMENTS LIMITED
Nilesh	Patel	Director	Urban RESI Ltd
Raj	Patel		

Appendix 1B : List of respondents

Lara	Paya Morant		
Dmitro	Peca	CEO	A7 PROPERTIES MANAGEMENT LTD
Jeremy	Phillips	Director	Waverley Building Services Ltd
Nick	Philo	Director and owner	Ortillia Developments Ltd
Cyrus	Pirani		
Tom	Prowse		
Joe	Purcell	Planning Consultant	Revive Planning and Renovations Ltd
Tina	Purcell	Heritage Consultant	Heritage Applications
Carol	Rahn		
Yasser	Rashid		
Mark	Rayner		
Nick	Renwick-Forster	Director	Hadham Property
Peter	Rickenberg		
Michelle	Ridge	Office admin	
Angus	Robertson	Chairperson	Roehampton Trust
Charles	Rose		City Planning Ltd
Bharat	Savjani		
Chris	Scott		
Jeremy	Scott	Director	IndigoScott Group Limited
Jason	See	Director	1st Architects lse
Andy	Sellars		
Sailesh	Shah	REMYs	REMYs
Tarik	Sheikh	Director	SHQ INVEST LIMITED
James	Simons		
Josephine	Simpson		
Nrinder	Singh		
John	Small		
Benjamin	Smith	Oakman Architecture Ltd	Oakman Architecture Ltd
Andrew	Solomon	Byoot	Byoot
Rochelle	Springer		
Andrew	Stanford		
Oliver	st John	Property consultant	
Seb	Steane	Director	Pennard Developments Ltd
Rosie	Sterry		Places for London (Formerly TTL Properties)
Charles	Stevenston	Director	Lexington Properties
Edward	Stone	Company Director-Property Acquisition	
Janine	Streuli		

Appendix 1B : List of respondents

Natasha	Styles	Group Planning Associate	The Planning Bureau on behalf of McCarthy Stone
Moulham	Suleyman	Director	Silvercrow Ltd
PJ	Sykes	Chamberland Residential	
Benny	Tang	Director	Tang Low Development Ltd
Richard	Taylor		
Ben	Temple	Director	Temples london
ty	tikari		
Nicola	Tikari		
Piers	Tussaud	Director	Londex Property
will	upton		
Edward	Vantreen		
Tom	Vantreen		
Stephen	Vantreen		
Matt	Verlander		Natural Gas Transmission
Matt	Verlander		National Grid Electricity Transmission
Isabella	Vevers		
Ian	Vincent		
Mordechai	Waldman		
Anna	Waterman		
Natasha	Weller		
Robin	Wemyss		
Jed	West	Chartered Surveyor	
George Sinclair	Williams		
Lorraine	Williams		
James	Wilson	Director	Languard
Jonathan	Woodcock		
Matthew	Woodham	Land & New Homes Director	JP Homes
Nick	Woodworth	Manging Director	Qualitas London Ltd
Keith	Woolf		Domus Developments Ltd
Malcolm	Wynder	development manager	artesian
Ringo	Yip	Director	BR Home Advisor
Simon	Yuen		
Pieter	Zitman		

Appendix 2: Consultation email/Letter to Consultees



Wandsworth Council

Environment and Community Services Directorate
The Town Hall Wandsworth High Street
London SW18 2PU

Telephone: 020 8871 7620

Email: planningpolicy@wandsworth.gov.uk
www.wandsworth.gov.uk

Our ref: LPPR/Reg18/Consultation/Oct23

Date: 20 December 2024

Dear Sir or Madam,

Consultation on the Partial Review of Wandsworth's Local Plan (2023-2038)

(Regulation 18)

23 October to 4 December 2023

The Wandsworth Local Plan was adopted in July 2023 and sets out a 15-year strategic vision, objectives and the spatial strategy for the borough, as well as the planning policies and site allocations that will guide future development. The Local Plan looks ahead to 2038 and identifies where the main developments will take place, and how places within the borough will change over that period.

What are we consulting on?

We are now consulting on a review and update of Policy LP23 Affordable Housing and other policies which relate to strengthening provision of homes for social rent for local people, together with any other consequential changes necessary for consistency across the Plan.

The aims of the review and update are to:

1. strengthen the Local Plan policy by setting out a clear policy requirement for new housing developments in the borough to provide at least 50 per cent of dwellings as affordable homes delivered on site;
2. seek a greater proportion of all new affordable homes to be genuinely affordable, preferably a 70/30 split in favour of social rent;
3. require affordable housing from small sites below the current threshold of 10 or more homes (gross).

We welcome views from our local community as well as stakeholders and developers on our ambitions to deliver more homes for social rent. We are particularly interested in views on how policies could be amended to deliver on our affordable housing priorities and the evidence that the Council should gather to support the Partial Review.

How to respond

This is the first consultation on the Partial Review of Wandsworth's Local Plan (2023-2038) and the supporting Sustainability Appraisal. Please read the consultation documents and other background information which are available at Wandsworth Town Hall reception and at the borough's main libraries, and on the Local Plan website: <https://www.wandsworth.gov.uk/localplan>

We would be grateful if you could please respond electronically, online via our Consultation Portal <https://haveyoursay.citizenspace.com/wandsworthecs/lp-23/> Please ensure your response is clearly labelled as 'Local Plan Partial Review – consultation response'.

You can also respond by completing this form, either electronically using Word or as a printout, and sending it to the Council by:

- Email to planningpolicy@wandsworth.gov.uk
- Post to Spatial Planning and Design, Environment and Community Services, Town Hall, Wandsworth High Street, Wandsworth, SW18 2PU.

All responses must be received by **11.59 pm on Monday 4 December 2023**. Please note that responses will not be treated as confidential and those submitted anonymously will not be accepted.

What happens next?

All comments from the Regulation 18 consultation will be considered at this stage to inform the review and updated policies. The next stage of formal consultation will be the Regulation 19 consultation, which will likely take place in mid to late 2024, with further opportunity to comment on the review process. At this stage we will publish draft policies and ask for comments on whether they are effective, robust and legally sound. The reviewed Local Plan is then submitted to the Secretary of State to undergo public examination by an independent planning inspector before it can be legally adopted.

If you are experiencing any difficulties accessing the consultation documents or the response form online, please contact the Planning Policy team by email at planningpolicy@wandsworth.gov.uk or call 020 8871 7620 and ask to speak to a member of the Planning Policy team.

Why have you received this?

You have received this notification as you have previously engaged with the Wandsworth Planning Policy & Design team. The Council is committed to ensuring that personal data is processed in line with data protection legislation and principles, including keeping data secure and ensuring that it will not be shared with any other organisation. The Council's Privacy Notice is published on the Council's website: www.wandsworth.gov.uk/privacy

We hope that you or your organisation will continue to take an interest in future planning policy and related documents. If you would like to continue hearing from us, then you do not need to do anything. If, however, you would prefer not to receive further notifications regarding planning policy and design matters then please notify us, preferably by email to planningpolicy@wandsworth.gov.uk or by post to the address provided.

Yours faithfully,

Christine Cook

Head of Spatial and Transport Planning

Appendix 3 - Evidence of Engagement

Screenshots and excerpts

Copy of pre-publication consultation details on Consultation Portal

Wandsworth Local Plan: Partial Review

Closed 4 Dec 2023

Opened 23 Oct 2023

Contact

Any queries please contact:

planningpolicy@wandsworth.gov.uk

Overview

What is the Local Plan and why are we reviewing it?

The Wandsworth Local Plan (2023-2038) was adopted in July 2023, and it sets out a 15-year strategic vision, objectives and spatial strategy to guide the future development in Wandsworth. It aims to ensure that growth and renewal happens in a sustainable and co-ordinated way, through a series of policies covering issues including housing, sustainability, heritage and employment. The Plan allows for development to meet the Council's vision for a fairer, compassionate and more sustainable borough.



Click [here](#) for more information about planning policy and the local plan.

The Council is carrying out a Partial Review of the Wandsworth Local Plan.

The Partial Review will include a review and update of Policy LP23 Affordable Housing and other policies as they relate to strengthening provision of homes for social rent for local people, together with any other consequential changes necessary for consistency across the Plan.

We are seeking:

- To strengthen the Local Plan policy by setting out a clear policy requirement for new housing developments in the borough to provide at least 50 per cent of dwellings as affordable homes delivered on site

- A greater proportion of all new affordable homes to be genuinely affordable, preferably a 70/30 split in favour of social rent
- To require affordable housing from small sites below the current threshold of 10 or more homes (gross)

The reviewed Local Plan policies will contribute to the Council's vision for a fairer, compassionate and more sustainable borough.

What is happening and how do I get involved?

We are holding a 6 week '*Regulation 18 consultation*' running from 23 October to 4 December 2023. The consultation is on the 'Regulation 18' version of the draft Local Plan and the supporting Sustainability Appraisal. We have also produced an Equality Needs and Impact Assessment and a Habitats Screening Assessment.

You can read the following documents by clicking on the links:

- [Regulation 18 Statement](#)
- [Sustainability Appraisal](#)
- [Equality Needs and Impact Assessment](#)
- [Habitats Screening Assessment](#)

Have your say

We welcome views from our local community as well as stakeholders and developers on our ambitions to deliver more homes for social rent. We are particularly interested in your views on how our policies could be amended to deliver our affordable housing priorities. This includes the evidence the Council should gather to support the Partial Review. We only require comments focusing on Local Plan policy LP23 and related areas, not the entire plan. This is to ensure the review is focused on the matters we feel are most urgent.

Please give us your views using the 'Online Survey' link below.

If you require a paper version of the questionnaire or documents, or any accessible materials please contact planningpolicy@wandsworth.gov.uk or call 020 8871 6000.

You can also respond to the consultation in the following ways:

- By email to planningpolicy@wandsworth.gov.uk
- By post to Spatial Planning and Design, Environment and Community Services, Town Hall, Wandsworth High Street, Wandsworth, SW18 2PU

All responses must be received by 11.59 pm on Monday 4 December 2023. Please note that responses will not be treated as confidential and those submitted anonymously will not be accepted.

What happens next?

All comments from this consultation will be considered at this stage to inform the review and updated policies.

The next stage of formal consultation will be the Regulation 19 consultation, which will likely take place in early 2024, with further opportunity to comment on the review process. At this stage we will publish draft policies and ask for comments on whether they are effective, robust and legally sound. The reviewed Local Plan will then be submitted to the Secretary of State to undergo public examination by an independent planning inspector before it can be legally adopted.

You can read more on the Council's website at www.wandsworth.gov.uk/localplan

To stay up to date with the Local Plan review process please register your details by emailing planningpolicy@wandsworth.gov.uk to be added to be informed of future consultation and updates.

Regulation 18 Website and Social Media Publicity

Example X (Formerly Twitter) Post



Wandsworth Council 

@wandbc

Follow

We are consulting on a partial review of our Local Plan – a legal document that sets out our long-term planning. If you're a Wandsworth resident, we want your views.

Visit [wandsworth.gov.uk/consultation](https://www.wandsworth.gov.uk/consultation) to take part



16:37 · 24/11/2023 · **2.6K** Views

Example Consultation Notice



More Homes for Social Rent

Wandsworth Council want to strengthen our planning policies to secure more genuinely affordable housing for local people in all new housing schemes.

Tell us what you think:

 [wandsworth.gov.uk/
localplanpartialreview](https://www.wandsworth.gov.uk/localplanpartialreview)

All responses must be received by midnight on Monday 4 December 2023.



© Wandsworth Council 2023



More social homes for families

Wandsworth has set out how it will create more genuinely affordable homes and cut waiting lists.

It's reviewing the Local Plan – a legal document setting out the council's long-term planning policy – and will look to developers to deliver more secure and affordable homes for local people.

As part of the review, residents will be asked for their views – part of the council's commitment to really listening to what local people think and want.

Historically in Wandsworth, property developers have only had to provide 35 per cent affordable homes when they built in the

borough. We want to increase this to half of new homes being affordable with a greater number of those being for social rent. These proposed new policies will apply to all property developments in the borough, not just large developments. Simon Hogg, Leader of the Council, said: "We are already building 1,000 new council homes on our own land through our Homes for Wandsworth plan – and introducing landlord licensing to protect renters. Now we are seeking to ensure property developers contribute towards our vision of a fairer borough for all."

Aydin Dilarden, Cabinet Member for Housing, said: "Thousands of children in Wandsworth grow up in temporary accommodation and that's why we are urgently seeking social rented homes that give them security for the long-term. We could comfortably fix this crisis in a decade if every third home built took another family off the council's waiting list."

Have your say at
[wandsworth.gov.uk/localplan](https://www.wandsworth.gov.uk/localplan)

Aydin Dilarden,
Cabinet Member for Housing



Driving out rogue landlords

We're consulting on proposals to draw up extra licensing rules to drive up standards and crack down on rogue landlords.

Wandsw

10 Bright

shared by more than three residents from different households. Aydin Dilarden, Cabinet Member for Housing, said: "Having a good home is the foundation for a good life. The schemes we are proposing would mean that the council is able to take more robust action on sub-standard homes and increase the support available to tenants – improving standards in the private rental market and creating a fairer borough for everyone."

A 10-week consultation on the proposed schemes will start in

More homes for social rent

The council has set out how it plans to alter housing policy to create more genuinely affordable homes and cut waiting lists.

Wandsworth Council has launched a Partial Review of the Local Plan - a legal document that sets out our long-term planning policy - that looks to developers to deliver more secure and affordable homes for local people especially more social housing.

To find out more about the local plan and convey your views, visit wandsworth.gov.uk/localplan



hms@wandsworth.gov.uk 3

Post-Regulation 18 Engagement



'Gloomy' Clapham Junction bridge to be transformed

Falcon Road rail bridge is set to be transformed thanks to a design competition launched by the council.

Architects, designers, and artists are invited to submit innovative proposals for a chance to improve this busy route which runs through the heart of Clapham Junction.

Residents from the local community - which includes Winstanley and York Road estates, Kambala Estate and Falcon Estate - will be invited to have their say on the shortlisted designs this autumn ahead of the final decision. The designs will be installed before the end of 2025.

Simon Hogg, Leader of Wandsworth Council said: "The gloomy and unwelcoming Falcon Road bridge cuts right through the middle of Clapham Junction's thriving shopping, residential and transport area. Improvements here are long overdue, so as part of our decade of renewal we're excited to use funds we've collected from local property developers to finally get the bridge transformed into a striking landmark as well as a better and safer route for everyone who uses it."

Manisha de Cordova, MP for Battersea said: "I know many local residents and businesses will join me in welcoming this fantastic project. I have been campaigning for improvements to the whole environment under Falcon Road bridge, making it a more accessible and safer space for everyone, especially at night."



"...we're excited to finally get the bridge transformed into a striking landmark as well as a better and safer route for everyone who uses it."

Helping residents understand the planning system

Wandsworth Council is working to make the local planning system more accessible for residents by producing an illustrated booklet that explains how planning works, why it is necessary, and how policies are developed.

In preparation for this review, the Planning team has been working with Area Housing Panels and Resident Forums to help residents to understand how the planning system works and how to participate in the consultation.

Council Leader Simon Hogg emphasised the importance of community input in the planning process, while Aydin Dastard, Cabinet Member for Housing, highlighted the need for more social housing to address the issue of temporary accommodation for families. To learn more or get involved, residents can visit wandsworth.gov.uk/localplan or email planningpolicy@wandsworth.gov.uk

Example X (Formerly Twitter) Post



Post



Wandsworth Council 

@wandbc

Follow

Ahead of the Local Plan Review consultation, which is due to launch later this year, we have produced helpful documents and are engaging with groups to understand how the local planning system works.

Read more here:



Helping residents to understand the planning system

wandsworth.gov.uk

13:01 · 19/09/2024 · **629** Views

What is Planning?

Places are always changing.

The areas where we live, work and play need to evolve to meet the changing needs of our community and respond to challenges like pressure for new housing



What is Planning?

Planning policy – the **Local Plan** – is created to help guide this process of change to make sure it delivers what we need.

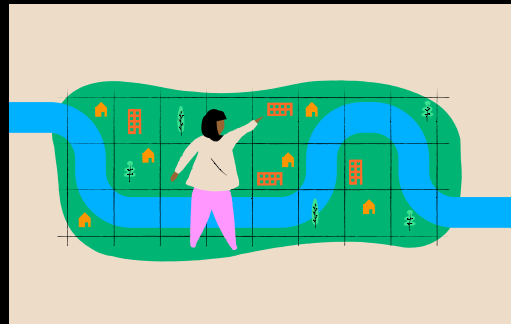
Development should meet the needs of the community. The Local Plan is one way to help guide that process.



What is the Local Plan?

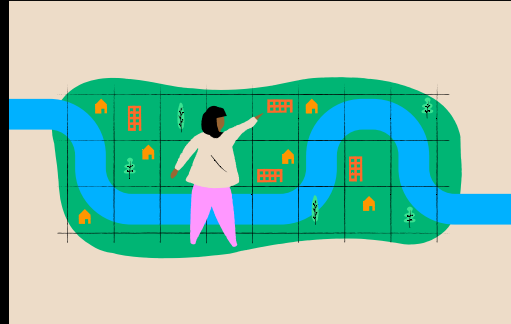
It's the main planning document a Local Authority can use to guide development in the borough

It helps to decide the outcome of planning applications and helps landowners and developers understand Wandsworth's priorities



What is the Local Plan?

Local Plans and other policies do not solve everything, but they do shape our vision for the borough and are influential in planning decisions.

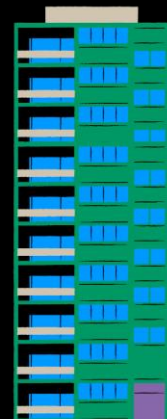


Early involvement is key!

Why are we reviewing the Plan?

The current Plan was ‘adopted’ (completed) in July 2023, and should last five years

However, the Council want to look again at the provision of ‘affordable housing’

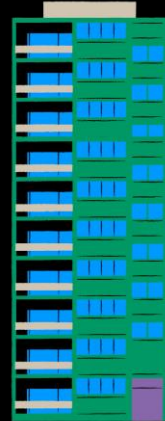


Why are we reviewing the Plan?

We're looking to change the policy to achieve higher amounts of affordable housing, and more of it for social rent

We're collecting evidence to achieve this

We'll issue a changed policy for comment at the end of this year



What is affordable housing?

All large developments should provide 'affordable housing' for people who are unable to access housing through the general market

Affordable housing includes housing for those most in need, in temporary accommodation or homeless, as well as those who want to buy but cannot afford to



What are we changing?

We currently ask for:

35% of homes provided on large developments to be made available as 'affordable'

Of the affordable homes, at least 50% to be low-cost rent, and the remainder intermediate

Nothing from small sites (less than 10 new homes)

We aspire to achieve:

At least 50% of homes provided on large developments to be made available as 'affordable'

Of the affordable homes, 70% to be low-cost rent, and the remainder to be intermediate

A financial contribution towards affordable homes from small sites

What we need from you

When we issue our policy for comment at the end of the year, we need your thoughts

Hopefully, there will be things to support

But it might be that you think we could make the policy better, or clearer

The policy is based on evidence, and defined within the planning system

But it is shaped by people telling us their experiences

Keep up to date: planningpolicy@wandsworth.gov.uk



Voluntary and Community Sector Workshop – 2nd October 2024 (Photo)



Resident's Conference – 23rd October 2024 (Photo)



Appendix 4 – Pre-Publication (Regulation 18) Consultation: Summary of Main Issues

Number of responses (196 through portal, 45 via email) - 239 total responses (approx. - pending assessment of duplicates and blank responses)

Level of support – results of portal questionnaire only:

	50% Affordable Housing	70/30 Split	Small Sites
Strongly Agree	40	28	24
Agree	9	22	5
Neither Agree or Disagree	3	17	8
Disagree	2	63	6
Strongly Disagree	141	65	149
Don't Know	1	1	1
Not Answered	1	1	4

Summary of Main Issues (including impact to other policies)

Issue	Summary
Housing should be more affordable	<ul style="list-style-type: none"> The response mainly from residents is support for the proposed approach, though there seems to be some reservation to the extension of affordable housing (AH) to small sites. Housing needs to be more affordable, especially for key workers
General support for more affordable housing	<ul style="list-style-type: none"> General support of the Council's aim to maximise the delivery of affordable homes Support for affordable housing contributions on sites <10 units where there is evidence that this is viable
Policy would result in fewer homes being built	<ul style="list-style-type: none"> There seems to be near unanimous opposition to the policy from developers who have responded to the policy, particularly small developers, who say the policy would make housing development unviable. This position is supported by some residents where it applies to small sites and <10 units. The proposal will result in less 'affordable' accommodation being available in the Borough The Wandsworth Local Plan Examination considered these issues and the conclusions are set out in the Examination Report. For

Issue	Summary
	<p>investment decisions to be made which can deliver affordable and other homes, a degree of consistency and stability is essential.</p>
<p>Wandsworth would become a pariah</p>	<ul style="list-style-type: none"> • Because the proposed approach would only apply to Wandsworth rather than be London-wide, concern is expressed that this would turn the Borough into a Pariah for new housing development in favour of other Councils, connected to the point above.
<p>Economically unviable</p>	<ul style="list-style-type: none"> • Due to other costs, such as contributions, borrowing, labour, etc., which already impact viability of small sites. Lambeth and Southwark given as examples of Boroughs that have made small sites unviable. Lambeth’s attempt to adopt a similar policy that was subsequently rejected by the Inspector also mentioned. Policy would result in considerable delay to process which increases costs for small developers. In addition, other policy requirements and conditions to discharge add to costs as small developers do not have expertise in-house. As above, suggestions that developers would go to different authorities. • Larger developers or landowners echo this, that the policy would impact the viability of schemes coming forward. Connect to lack of a viability study and inconsistency with the 2022 Viability Study. • Build costs have gone up significantly over the last 24 months against a back drop of falling house prices and rising interest rates. • The costs associated with achieving and delivering planning permissions has also risen steeply – including energy assessment, sustainability, bio-diversity, ecology, accessibility/inclusivity and fire safety. • Social rent is less profitable and so the proposed tenure split would impact viability. • It would be likely to result in more viability disputes – causing delay and uncertainty.
<p>AH on small sites would slow down the planning system</p>	<ul style="list-style-type: none"> • Several comments stating the need to negotiate AH contributions on small sites would prolong decision-making and clog the system. Point to Lambeth and Southwark where this has happened (up to 71 weeks in LBL). • This prolonging of decisions further drives up costs as applicants face holding costs and pay interest on the land, which impacts the viability of the scheme.

Issue	Summary
The proposed changes would disproportionately hit small developers	<ul style="list-style-type: none"> • There seems to be some reservation to the extension of affordable housing to small sites. • Small firms employ local people and suppliers, which could be impacted. • Small developers play an important role in the delivery of much needed additional and sustainable housing. The proposed policy would compromise the delivery of new housing and could lead to a degradation in the average level of the housing stock in the borough due to the additional costs imposed on developers. • A developer is allowed to make a 20% profit before affordable housing contributions are deemed payable. Macro-economic pressures make achieving a 20% profit on a development far from being guaranteed. • The damage to the supply of housing from smaller sites will far outweigh the gain from instigating this policy. • Policy inflation (increasing requirements) adds extra layers of complexity to both securing planning permission and delivering the development; and requires in-house expertise or experience and/or the up-front finances which small/medium housebuilders don't have. • Some responses seem to confuse the requirement and that 50% of minor schemes would have to deliver on-site.
70% social rent could jeopardise AH	<ul style="list-style-type: none"> • By making it difficult to find a HA. Several said the proposed tenure split would make projects unviable as social rent is less lucrative than other means of AH.
70/30 tenure split not viable	<ul style="list-style-type: none"> • As set out on page 29 of the Viability Study 2022, it was concluded that these tenure mixes (including the requirement for a 70/30 tenure split in favour of Social Rent) were found to place risk on the Local Plan's delivery and as such, the provision of a 50/50 tenure mix was pursued.
What sort of AH?	<ul style="list-style-type: none"> • Would London Affordable Rent (LAR) be included in the proposed social rent requirement. We would also welcome clarification on what intermediate products the Council might aim at, particularly in light of the Government's requirement set in <i>Planning Practice Guidance</i> in 2021, that 25% of affordable homes delivered by developers should be First Homes for sale to first-time buyers at a discount of 30%. We believe that neither that scheme nor Discounted Market Rent can meet the needs of current and potential residents in Wandsworth; and that the requirement should therefore specify genuinely affordable housing such as London Living Rent

Issue	Summary
	<ul style="list-style-type: none"> • Would a sliding scale of contributions from developments on sites below the threshold of ‘capable of ten or more units’ adopted in the Local Plan for Richmond, or some other mechanism, be the best approach in Wandsworth?
AH should be provided by someone else	<ul style="list-style-type: none"> • Suggestions that policy approach focus on large developments, or solely provided by the local authority or a housing association.
How would affordable housing work on small schemes?	<ul style="list-style-type: none"> • Housing associations advise us that they have little interest in taking on a handful of units within a wider scheme
Lack of evidence	<ul style="list-style-type: none"> • No evidence to support Q1 or Q2 of the consultation • Calls for evidence that show the viability of the proposed approach. Lack of evidence is in conflict with NPPF – see below section. Lack of evidence to show proposed approach would still enable the Council to meet its housing target. • NPPF “31. The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.” • Between January 2022 (when the Local Plan viability was tested) and December 2023 the viability of residential development has substantially worsened: <ul style="list-style-type: none"> ○ Increased build costs – BCIS indicates a 10.05% increase. ○ A toughening sales market – with values increasing only 2.98% since January 2022 and falling over the last 6 months (Land Registry, Wandsworth). ○ Second staircase requirements – adding cost to developments and reducing gross:net efficiency. ○ Increasing finance costs –Bank of England base rate rising from 0.25% to 5.25% over the period. • The framework of the Sustainability Appraisal is not proposed to be amended to reflect the proposed policy changes – reduced viability may have adverse impact on the delivery of new homes and sustainability, reducing access to new homes across each tenure.

Issue	Summary
Impact on other policies	<ul style="list-style-type: none"> • Detrimental impact on overall housing delivery and housing trajectory (Policy SDS1) • Pressure to increase overall housing on development sites, particularly on height outside of tall building areas (LP4) • Whether affordable housing change includes provision of affordable supported housing (LP31) and other forms of housing (students, co-living, build-to-rent)
	<ul style="list-style-type: none"> • 31, as above, and: • Lack of proposed changes to the wording of the policy, instead it is entirely aspirational. <p>“15b. be prepared positively, in a way that is aspirational but deliverable.”</p> <p>“15c. contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.”</p> <ul style="list-style-type: none"> • AH for small sites <p>“64. Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer).”</p> <ul style="list-style-type: none"> • Consideration of economic viability <p>“68. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability”</p> <ul style="list-style-type: none"> • Not in accordance with national planning guidance on viability • Use plan stage viability assessments to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan (Ref ID: 10-002-20190509). • Set affordable housing policies at a level that allows development to be deliverable, without the need for further viability assessment at the decision-making stage (Ref ID: 10- 002-20190509).
Conflict with London Plan	<ul style="list-style-type: none"> • Policy H5, connected with lack of evidence to show local need for departing from London Plan policy. • H5 identifies a portfolio approach 50% & consideration of complex sites where AH makes 50% unviable

Issue	Summary
	<ul style="list-style-type: none"> • GLA says 50% may not be in conformity with the London Plan. Support for tenure split and support for small sites where the evidence shows it would be viable. • Proposal/Q3 would work against London Plan policy H2 which seeks to support small developers to bring forward housing delivery on small sites
Conflict with 2022 Viability Study regarding tenure split	<ul style="list-style-type: none"> • Several responses reference data from this study, particularly scenario testing that showed the proposed approach would be unviable.
Other Policies/suggestions for inclusion within policy beyond scope of consultation	<ul style="list-style-type: none"> • Specialist housing – mandating all/certain percentage of housing meet Building Regulations M4(2) and (3). • Opportunity to review LP24 Housing mix – oversaturation of small units rather than family sized homes. • BDTQ (comments are completely unrelated to affordable housing) • Addressing housing for key workers in the policy • Consider how existing housing affordability issues for NHS workers as essential workers can be addressed through planning policy • The Housing Needs Assessment (HNA) which underpinned the policies in the adopted Wandsworth Local Plan is based on out-of-date evidence (notably the 2011 census). What plans does the Council have to update the HNA? • Relationship with the portfolio approach of the London Plan.

Residents, resident groups – generally support

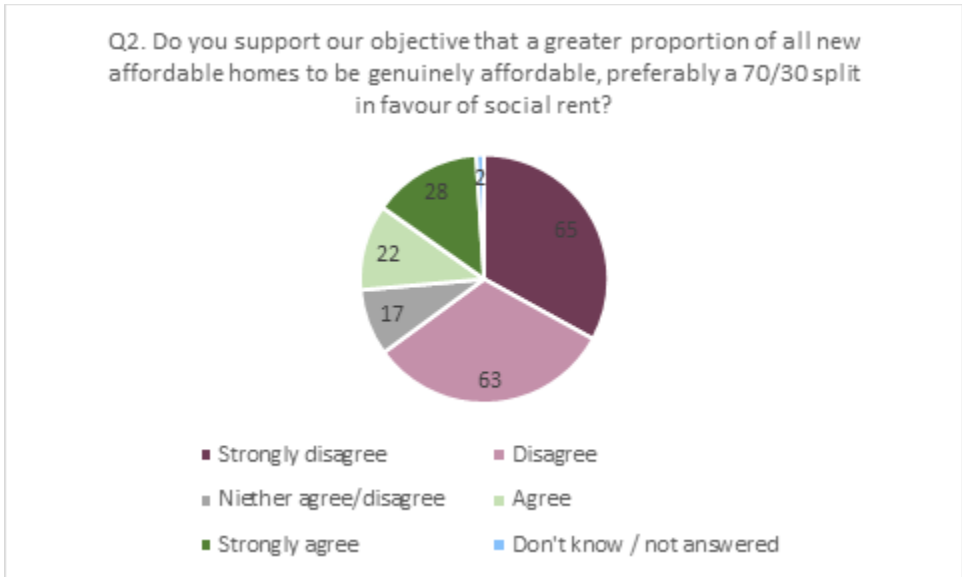
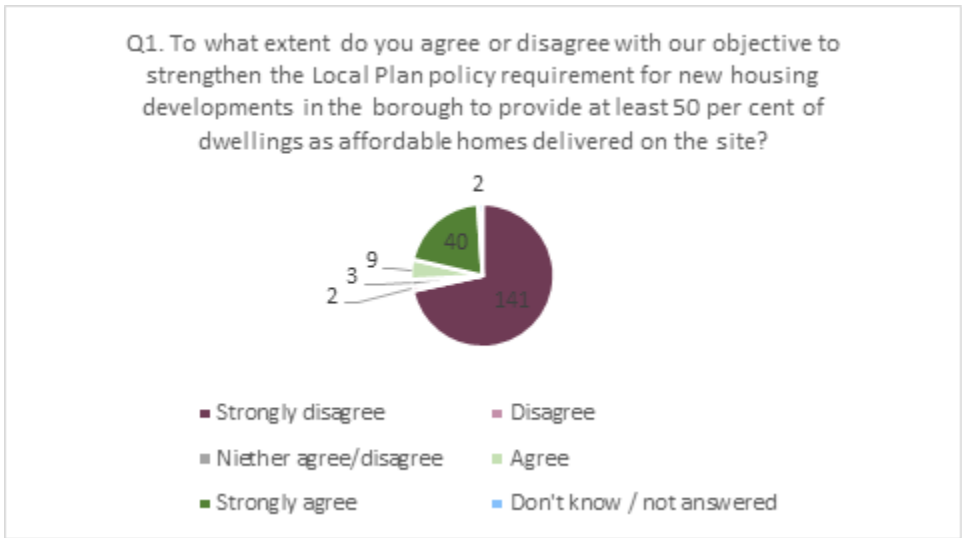
Charities & NGOs – generally support

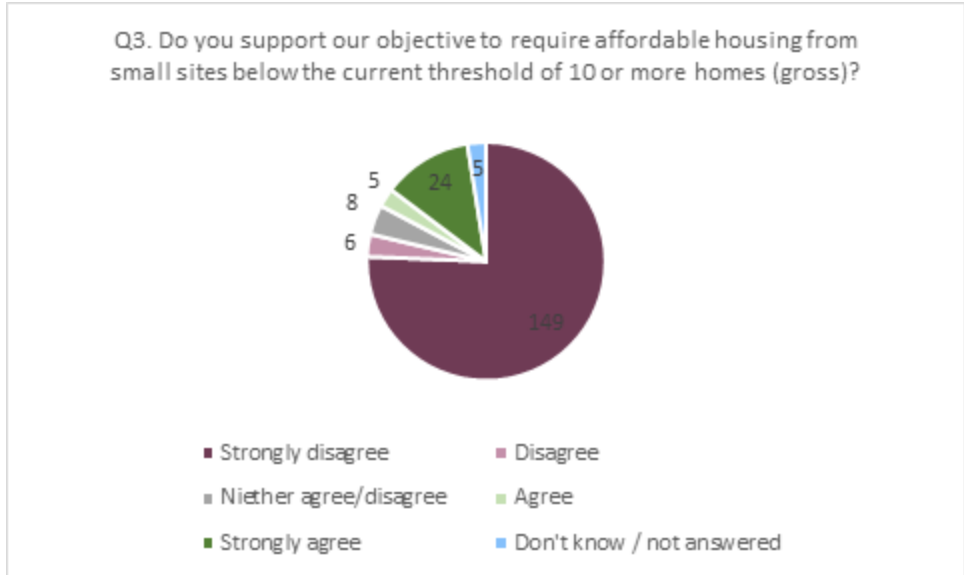
Small developers – overwhelmingly against application of policy on small sites, some do not take issue with 50% or tenure split if it applies to large sites only though some have questioned the efficacy of the approach.

Larger developers – generally consider the proposed approach unviable, and take issue with lack of evidence to the contrary

Statutory bodies – mostly have no comment, other boroughs generally supportive, GLA and TfL's Places for London apprehensive over lack of evidence

Level of support





[Base: Online survey - 197 respondents (excludes email responses which will be added in later)]

LONDON BOROUGH OF WANDSWORTH

CONSULTATION ON REGULATION 18 PRE-PUBLICATION LOCAL PLAN PARTIAL REVIEW

Planning and Compulsory Purchase Act 2004 Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008

Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)

The Partial Review will include a review and update of Policy LP23 Affordable Housing as set out in the Wandsworth Local Plan (2023 – 2038) and other policies as they relate to strengthening provision of homes for social rent for local people, together with any other consequential changes necessary for consistency across the Plan:

- a) We are seeking to strengthen the Local Plan policy by setting out a clear policy requirement for new housing developments in the borough to provide at least 50 per cent of dwellings as affordable homes delivered on site.
- b) We are seeking a greater proportion of all new affordable homes to be genuinely affordable, preferably a 70/30 split in favour of social rent.
- c) We are seeking to require affordable housing from small sites below the current threshold of 10 or more homes (gross).

We welcome views from our local community as well as stakeholders and developers on our ambitions to deliver more homes for social rent. We are particularly interested in views on how policies could be amended to deliver on our affordable housing priorities and the evidence that the Council should gather to support the Partial Review.

The consultation is on the 'Regulation 18' version of the draft Local Plan and the supporting Sustainability Appraisal. These documents can all be viewed on the Council's website as follows:

www.wandsworth.gov.uk/localplan

You can respond in the following ways:

- Online through the 'Draft Local Plan Consultation Portal', which can be accessed through the website listed above.
- By email to planningpolicy@wandsworth.gov.uk.
- By post to Spatial Planning and Design Team, Environment and Community Services, Town Hall, Wandsworth High Street, London, SW18 2PU.

The consultations begins on Monday 23 October 2023. All responses must be received by 11.59pm on **Monday 4 December 2023**.

We would be grateful if you could please respond electronically, where possible by using the online Consultation Portal. If you are responding by email or post, please use the 'Response Form' that is available to view and download from the website listed above. Please ensure your response is clearly labelled as 'Local Plan Partial Review – Response to Regulation 18 consultation'.

Please note that responses will not be treated as confidential and those submitted anonymously will not be accepted. Further information can be found on our website at www.wandsworth.gov.uk/localplan.

Appendix 6 - All responses received at Pre-Publication (Regulation 18) stage with officer response



All responses received to the Partial Review of the Local Plan (Regulation 18) and the Council’s response

<https://www.wandsworth.gov.uk/planning-and-building-control/planning-policy/local-plan/local-plan-partial-review/>

Consultation from 23 October to 4 December 2023

Rep No.	Respondent Name	Comments	Officer’s Response
001	Tasneem Abdulla, Blue Gecko Architecture	<p>4. Strongly disagree</p> <p>5. 50% affordable housing is too high for smaller development sites. Previous threshold of 10 units should be retained.</p> <p>6. Disagree</p> <p>7. 70/30 split in favour of social rent will make developments unviable. Social housing should be provided by the government. This should not be a burden for the private sector.</p> <p>8. Strongly disagree</p> <p>9. Smaller developers cannot carry the cost of this change. It will make development unviable. Above will only clog up the Planning system further which still hasn’t recovered to the standard assessment period of 8 weeks we enjoyed pre-covid. Financial viability; holding costs of land at present is unsustainable with interest rates at a 15 year high, on a £1 million property which is pretty standard in Wandsworth developers are easily paying £12K month in interest</p>	<p>(5) Comments noted. The Council will be collecting and testing evidence to support policy changes.</p> <p>(7) Comments noted. The policy reflects a reasonable method for securing affordable housing. The Council will be collecting and testing evidence to support policy changes.</p> <p>(9) Comments noted. The Council will be collecting and testing evidence to support policy changes. The Council will also evaluate the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs, and will seek to find a balance that meets the aspirations of the Council whilst</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>waiting for a planning decision, if this increases from an average of 12 weeks to a possible of 70 weeks this alone will make development in the borough unsustainable. Financial viability; costs of achieving planning permission has risen sharply recently due to stricter sustainability and biodiversity policies implemented. All developments now need to include green/brown roofs, air/ground source heat pumps, photovoltaics, enhanced building insulation, the associated costs of installing all these measures has pushed up building costs considerably on top of the increased material/labour costs since Brexit/Covid. If it becomes too expensive for developers to develop in Wandsworth the derelict/run down sites dotted around the borough will not get developed and regenerated which will have a knock on effect on the surrounding street scene and in five years' time Wandsworth will look a very different borough from today with many rundown/derelict buildings/sites around the borough that are not financially viable to regenerate. Simple maths; if developers stop building properties in Wandsworth as it's no longer sustainable/viable there will be less supply, therefore forcing up rental/purchase prices – the exact opposite of what this policy implementation is trying to achieve.</p> <p>10. Additional comments We really need to help the system to recover to achieve the pre-pandemic 8 week decision period, and also apply pressure for government provided social housing so the burden is not in the private sector. Financial contributions in the manner of CIL for larger developments of 10 and over should be considered.</p>	<p>also managing the expectations of those engaging with the planning system.</p> <p>(10) Comments noted.</p>
002	P Adamczyk, Frontline	<p>4. Strongly disagree</p> <p>5. economically unviable, counterproductive in the long term, informed by good intentions rather than real data</p> <p>6. Strongly disagree</p> <p>7. it makes no economic sense at all, might as well suggest 100% social housing- the effect will be the same: the taxpayers will have to pay for it.</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>9. why would a small developer, or a site owner invest in infill sites? Why propose policies which appear to have no economic basis whatsoever? has anybody actually made a financial impact assessment??</p>	<p>on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p>
003	Cynthia Abu-Ameyaw	<p>4. Strongly agree</p> <p>6. Agree</p> <p>8. Strongly agree</p>	<p>Support noted.</p>
004	Rajiv Agarwalla	<p>4. Strongly disagree</p> <p>5. It makes no sense for smaller (and even larger) sites to have this ratio. The time taken to deal with planning plus the costs to implement mean that you will just see development stop happening as it would be unaffordable.</p> <p>6. Neither agree nor disagree</p> <p>7. At the end of the day, it's not free money. The numbers have to work or it just won't happen.</p> <p>8. Strongly disagree</p> <p>9. Small developers cannot afford the delays in planning as it is, and when combined with this will make most small sites completely unviable. This is actually worse for the council as they will be beholden to very large developers with deep pockets and in the end it is the residents who will suffer.</p> <p>10. For developments of less than 10 units it is complete madness to try and force affording housing on them. The time, cost and scale simply isn't there and it will have negative long term consequences.</p>	<p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>

Rep No.	Respondent Name	Comments	Officer's Response
005	Sam Ahmed, Saam Investments	<p>4. Strongly agree</p> <p>5. It should be reasonable % and not in small development less than 10 flats</p> <p>6. Disagree</p> <p>7. Appears too much</p> <p>8. Disagree</p> <p>9. LP23</p> <p>10. Nothing more</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p>
006	Mohamed Ali	<p>4. Strongly disagree</p> <p>5. This will halt smaller developments, restrict investment in the borough, brown sites will not come forward for regeneration and redevelopment, will prevent efficient use of land will lead to shortage of housing and push up rents</p> <p>6. Disagree</p> <p>7. This is too much</p> <p>8. Strongly disagree</p> <p>9. This is totally unsustainable. This will prevent outside investment into the Borough. There will be extensive delays in the planning decision time, Land Values high in the borough additional burden already by government policy on greening and tougher building regs requirement on developers from substantial hike on building costs additional therefore with this policy will place additional burden on the developers and the projects will simply become unviable which will drive investments out of the borough. This will cause property prices and rents to</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p> <p>Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		spiral in the borough and quite simply have an overall negative affect on the borough.	
007	Sajid Ali, Prime Group	<p>4. Strongly agree</p> <p>5. You will kill off all development and the efficient use of spaces , it would be unviable- potential developments will not even try to see if they can make it viable - Lot of good developments will be priced out</p> <p>6. Strongly agree</p> <p>7. You will kill off all the good development work in the borough</p> <p>8. Strongly agree</p> <p>9. This will even kill off the smaller developments- lot of the houses are underused and can be subdivide for efficient use . Especially the elderly want to down size within their own home by splitting it will not do it</p> <p>10. We are experience private property providers in the borough , many of our own houses that we have developed working in harmony with the Wandsworth planning , have been let to Wandsworth Council tenants . Interest rates are now so high that affordable housing even on commercially viable schemes previously is not possible . . You will dampen the private provision of properties which the borough recognises plays an important role in providing the needed stock in the borough</p> <p>It will also stun our economic growth not just in borough but nationally . Please allow the sector and the economy and economic growth to pick up You will just push lot of the small and medium size developers ./businesses out of the market</p> <p>Reconsider this matter when we have some economic stability , been hit by covid , high interest rates , high cost of construction , inflation -there is a limit to how much any business / its people can take</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable and will not have a negative impact on the provision of other tenures. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p> <p>The Council will be seeking to update the January 2022 Porter Planning Economics report alongside an update of the Local Housing Needs Assessment, which will consider changes in the economy, and in housing need, in the intervening period.</p>

Rep No.	Respondent Name	Comments	Officer's Response
008	Celina Ammar	<p>4. Disagree</p> <p>6. Strongly disagree</p> <p>8. Strongly disagree</p>	Comments noted.
009	Taylor Andrews, SGN Mitheridge Ltd	<p>Executive Summary SGN Mitheridge Ltd is an active investor / developer within Wandsworth and supportive of the Council's aims to maximise the delivery of affordable homes within a more sustainable borough. SGN Mitheridge Ltd is currently progressing proposals for the Wandsworth Gas Holders site, planning 238 net zero carbon affordable homes as part of a wider mixed tenure development. The scheme will also remediate the site following its historic polluting uses, transforming this into new public green spaces.</p> <p>Whilst supportive of the overall aspirations of the Reg 18 Plan, SGN Mitheridge Ltd opposes the apparent removal of the Threshold approach which currently allows schemes providing 35% affordable homes to follow the Fast Track route. Under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004, Borough Local Plans must be in 'general conformity' with the London Plan, ensuring that the planning system for London operates in a joined-up way and reflects the overall strategy for how London can develop sustainably, which the London Plan sets out.</p> <p>Removal of the Threshold Approach would be inconsistent with Section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. This change, combined with a requirement for a 70/30 tenure split in favour of social rent, will substantially impact the viability of development at a time when rising interest rates, challenging sales markets and issues such additional costs net internal area losses associated with 2nd stair requirements are already causing many developments to stall.</p>	<p>Comments noted.</p> <p>The Council will be seeking to update the January 2022 Porter Planning Economics report alongside an update of the Local Housing Needs Assessment, which will consider changes in the economy, and in housing need, in the intervening period.</p> <p>The Council will consider the policy's relationship with the threshold approach and London Plan policy. The Council will be working with the GLA and other bodies to ensure that the policy is in conformity with other planning documents and guidelines and is justifiable and evidenced.</p> <p>Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>The change will prevent the delivery of many sites (and therefore affordable homes) within the borough. It is also at odds with national guidance requiring plans to set viable and deliverable policies, avoiding the delay and uncertainty created by application stage viability assessments.</p> <p>It is understood from Council officers that viability testing to inform the partial review of the Local Plan has not yet been undertaken. SGN Mitheridge Ltd would be pleased to participate in such testing in the future, helping ensure proposals are shaped to support rather than become a barrier to delivery of much needed homes. In the interim these representations provide useful evidence as to the challenges of the currently proposed Reg 18 Plan policies.</p> <p>Viability Testing</p> <p>The viability of the current Local Plan policies was tested in January 2022 via the Porter Planning Economics report commissioned as part of the adopted local plan evidence base. Between January 2022 and December 2023 the viability of residential development has substantially worsened due to:</p> <ul style="list-style-type: none"> ▪ Increased build costs – BCIS indicates a 10.05% increase. ▪ A toughening sales market – with values increasing only 2.98% since January 2022 and falling over the last 6 months (Land Registry, Wandsworth). ▪ Second staircase requirements – adding cost to developments and reducing gross:net efficiency. ▪ Increasing finance costs – with the Bank of England base rate rising from 0.25% to 5.25% over the period. <p>The factors above are already impacting development activity, with the sum of new applications and construction starts in Q1 2023 39% below the 2022 quarterly average, and 69% below the peak of 2015 (Molior quarterly data).</p> <p>Within the January 2022 Viability Study 41 Development Typologies were tested, with 27% of these being unviable at that time with the current 35% 50/50</p>	<p>whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council aims to produce a clear and robust policy as to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p> <p>This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures including intermediate homes.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>affordable housing policy. As detailed at Appendix A to this letter, Quod has adopted the assumptions within the January 2022 study, updated these to today and applied the proposed Reg 18 Plan policies of 50% affordable homes in a 70/30 tenure split.</p> <p>The results of the Quod testing indicate an 81% reduction in residual land value meaning that the vast majority of the 41 development typologies tested would become unviable. In practical terms this simply means less affordable homes will be delivered (as sites stall) and those that are delivered will be delayed due to the need for site-specific viability assessments.</p> <p>The above would mean that adoption of the proposed policies changes is not in accordance with the National Planning Policy Framework and associated guidance. In particular the requirements to:</p> <ul style="list-style-type: none"> ▪ Use plan stage viability assessments to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan (Ref ID: 10-002-20190509). ▪ Set affordable housing policies at a level that allows development to be deliverable, without the need for further viability assessment at the decision-making stage (Ref ID: 10-002-20190509). <p>Housing Need The change from a 50/50 to 70/30 tenure mix will inevitably reduce the supply of intermediate tenure homes in Wandsworth. This reduction comes at a time of extreme pressure on local working households, with record increases in private rents and mortgage costs. As such the supply of intermediate homes will be reduced at a time when more households are falling into need for intermediate homes to rent or buy.</p> <p>The latest CACI data indicates that 75,000 households in Wandsworth (55% of the total) have a combined income of between £30,000 and £90,000, meaning that they are not prioritised for social rent homes but are often unable to afford a</p>	

Rep No.	Respondent Name	Comments	Officer's Response
		<p>market home that meets their needs. Keyworkers form a substantial proportion of this group, with Census / ASHE data indicating for example:</p> <ul style="list-style-type: none"> ▪ 6,681 Teaching & education professionals in the borough with a median individual income of £45,312. ▪ 3,621 Nursing and midwifery professionals in the borough with a median individual income of £43,101. ▪ 23,500 keyworkers including protective services, welfare, caring and transport professionals who either individually or in joint income households can afford intermediate homes for rent or sale. <p>Delivery of intermediate homes is therefore critical to serve the needs of local keyworkers and has a direct benefit to public services (Quod has surveyed numerous keyworker employers in London with the main reason for high employee turnover almost consistently given as affordability / availability of housing). Census data indicates that just 2% of homes in Wandsworth are currently of intermediate tenure, evidencing the substantial shortfall to the 55% of households who need this form of tenure to enjoy a home that meets their needs at an affordable cost.</p> <p>Delivery of intermediate housing is at the heart of enabling and sustaining good growth and is recognised to be critical to re-balancing the housing market, the London Plan 2021 states: <i>“Affordable housing is central to allowing Londoners of all means and backgrounds to play their part in community life. Providing a range of high quality, well-designed, accessible homes is important to delivering Good Growth, ensuring that London remains a mixed and inclusive place in which people have a choice about where to live. The failure to provide sufficient numbers of new homes to meet London’s need for affordable, market and specialist housing has given rise to a range of negative, economic and environmental consequences, including worsening housing affordability issues, overcrowding, reduced labour market mobility, staff retention issues and longer commuting patterns.”</i> (paragraph 1.4.2)</p>	

Rep No.	Respondent Name	Comments	Officer's Response
		<p>Reducing the supply of intermediate homes will have a direct negative impact on local households' ability to find a home that meets their needs.</p> <p>Conclusion Whilst the Reg 18 Plan aspirations for a fairer, compassionate and more sustainable borough are supported, the housing policies as currently drafted risk substantially reducing housing and therefore affordable housing delivery.</p> <p>As demonstrated within these representations, the proposed policy changes are not supported by evidence and should be appropriately amended prior to the Regulation 19 stage of the Local Plan partial review.</p> <p>SGN Mitheridge Ltd looks forward to continuing to be an active and important investor and developer in the borough and would welcome the opportunity to engage further with the Council as it develops policies.</p>	
010	Vicky Aston, Sport England	Sport England does not wish to comment	No response required.
011	Michael Atkins, Port of London Authority	<p>Neither agree nor disagree to all</p> <p>Additional comments</p> <p>Thank you for consulting the Port of London Authority (PLA) on the London Borough of Wandsworth Partial Review of the Local Plan, which includes a review and update of Policy LP23 (Affordable Housing) and other policies as they relate to strengthening provision of homes for social rent for local people. I have now had the opportunity to review the consultation documents and can confirm the PLA has no comments to make on the proposed amendments.</p>	No response required.
012	Andrew Austen	<p>4. Strongly disagree</p> <p>5. 50% is far too much. All this will do is stop developers building in Wandsworth and then it'll push up rental prices which are already extortionate. I also live in the</p>	Comments noted.

Rep No.	Respondent Name	Comments	Officer's Response
		<p>borough and do not believe this is the right way forward. Rather than just forcing developers to provide for those on low incomes or those who are the very worst and don't want to work, there should be new buying schemes.</p> <p>6. Disagree</p> <p>7. It's just way too much and completely unrealistic</p> <p>8 Strongly disagree</p> <p>9. As per my previous points, it's far too much and especially on these smaller schemes. I understand there should be a provision on developments over 50 units but not as little as 10.</p>	<p>The Council will be collecting and testing evidence to support policy changes. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p>
013	Dennis Austin, Daab Design Architects	<p>Regarding the Local Plan, please note:</p> <ul style="list-style-type: none"> • I am in full support in the efforts to increase the affordable housing rate for new developments and support policies: LP23, LP24, LP26 and LP 26. • I support the Battersea Design & Tech Quarter CAZ, however, <ul style="list-style-type: none"> ○ Considering recent reconfigured boundary of this project have concern that the omission of the Stewarts Lane site (Silverthorne Rd) is to the detriment of the BDTQ. ○ The draft BDTQ plan issued 2020 haphazardly proposed development within Network Rail and Bidfood sites without the benefit of appropriate discussion with NR and their plans to develop the site. As a consequence, the Battersea Studio "suggestion" of a campus of shared office fronting Silverthorne Road was unrealistic and sent the wrong message of hope to local residents which I am. ○ Further development of the BDTQ must include sincere communication with NR, Bidfood and the local residents. ○ The Local Plan's aspiration for connectivity within the BDTQ is commendable however, there is no reflection on the impact to sites adjacent to the rail lines which will need to integrate bridges, and or tunnels. The implication to buildable plots to create these pieces of infrastructure have been handled in a naive manner. 	<p>Comments noted.</p> <p>The Local Plan review is focussed on affordable housing only and the rest of the Local Plan will remain in place.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<ul style="list-style-type: none"> ○ Spatial Allocation: More design work is required to advance the BDTQ which must include local design input. ○ Tall Buildings: The policy on tall buildings within the BDTQ (TB-B3a-02) would benefit from additional analysis, specifically within Ingate Place where, due to its setback from Queenstown Road and the low residential properties could integrate greater height and density. ○ Mid-Rise Buildings: Additionally, the policy of mid-rise buildings would benefit from more work as the BDTQ's set-back from local residential areas could accept greater density. 	
014	Dennis Austin, Battersea Untangled	<p>Regarding the Local Plan, please note:</p> <ul style="list-style-type: none"> ● We are in full support in the efforts to increase the affordable housing rate for new developments and support policies: LP23, LP24, LP26 and LP 26. ● We support the Battersea Design & Tech Quarter CAZ, however, <ul style="list-style-type: none"> ○ Considering recent reconfigured boundary of this project have concern that the omission of the Stewarts Lane site (Silverthorne Rd) is to the detriment of the BDTQ. ○ The draft BDTQ plan issued 2020 haphazardly proposed development within Network Rail and Bidfood sites without the benefit of appropriate discussion with NR and their plans to develop the site. As a consequence, the Battersea Studio "suggestion" of a campus of shared office fronting Silverthorne Road was unrealistic and sent the wrong message of hope to local residents which I am. ○ Further development of the BDTQ must include sincere communication with NR, Bidfood and the local residents. ○ The Local Plan's aspiration for connectivity within the BDTQ is commendable however, there is no reflection on the impact to sites adjacent to the rail lines which will need to integrate bridges, and or tunnels. The implication to buildable plots to create these pieces of infrastructure have been handled in a naive manner. ○ Spatial Allocation: More design work is required to advance the BDTQ which must include local design input. ○ Tall Buildings: The policy on tall buildings within the BDTQ (TB-B3a-02) would benefit from additional analysis, specifically within Ingate 	<p>Comments noted.</p> <p>The Local Plan review is focussed on affordable housing only and the rest of the Local Plan will remain in place.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>Place where, due to its setback from Queenstown Road and the low residential properties could integrate greater height and density.</p> <ul style="list-style-type: none"> ○ Mid-Rise Buildings: Additionally, the policy of mid-rise buildings would benefit from more work as the BDTQ's set-back from local residential areas could accept greater density. <p>We remain hopeful that the BDTQ can deliver qualitative change to local communities.</p>	
015	<p>Marc Avis, Avis Appleton & Associates Ltd</p>	<p>4. Strongly disagree</p> <p>5. In response to Regulation 18, Point A I would comment: The proposal will have a negative impact in the long term, development will be unsustainable causing a loss of homes, which is the exact opposite of what the policy is trying to achieve. There will be economic implications for all businesses involved in the construction sector across Wandsworth resulting in a loss employment and income for the Borough.</p> <p>6. Agree</p> <p>7. In response to Regulation 18, Point B: I have no objection to this in fact I would support it, but this must relate only to large scale developments, not developments under 10 units.</p> <p>8. Strongly disagree</p> <p>9. In response to Regulation 18, Point C: Developers on Small Sites would not be able to sustain this level of commitment and would have to challenge via the viability assessments. This will causes additional expense, delays and negative feelings between all parties, resulting in general loss all round.</p> <p>10. I think this is poor idea with long term consequences that will affect the Borough in a detrimental way.</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, including on small sites.</p> <p>Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>

Rep No.	Respondent Name	Comments	Officer's Response
016	Andrew Badrudin, London Property Holdings Limited	<p>4. Neither agree nor disagree</p> <p>6. Neither agree nor disagree</p> <p>8. Strongly disagree</p> <p>9.</p> <ul style="list-style-type: none"> • Implementing Affordable Housing will substantially delay the decision period due to the negotiation period with legals, currently we enjoy decisions in 8-12 weeks but this could increase to 70 weeks. The Planning Inspector who forced Lambeth to drop their Affordable Housing contributions for under 10 units which they were going to implement in their Sept 2021 Local Plan stated taking a sample of 60 schemes for minor developments the decision period took an average of 71 weeks due to the negotiation process of Affordable Homes Contributions. Example where this is currently happening is Southwark Council with over 100 small site schemes currently sitting in limbo awaiting their Affordable sites to be sorted out. • Above will only clog up the Planning system further which still hasn't recovered to the standard assessment period of 8 weeks we enjoyed pre-covid. • Financial viability; holding costs of land at present is unsustainable with interest rates at a 15 year high, on a £1 million property which is pretty standard in Wandsworth developers are easily paying £12K month in interest waiting for a planning decision, if this increases from an average of 12 weeks to a possible of 70 weeks this alone will make development in the borough unsustainable. • Financial viability; costs of achieving planning permission has risen sharply recently due to stricter sustainability and biodiversity policies implemented. All developments now need to include green/brown roofs, air/ground source heat pumps, photovoltaics, enhanced building insulation, the associated costs of installing all these measures has pushed up building costs considerably on top of the increased material/labour costs since Brexit/Covid. 	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, including on small sites.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<ul style="list-style-type: none"> • If it becomes too expensive for developers to develop in Wandsworth the derelict/run down sites dotted around the borough will not get developed and regenerated which will have a knock on effect on the surrounding street scene and in five years' time Wandsworth will look a very different borough from today with many rundown/derelict buildings/sites around the borough that are not financially viable to regenerate. • Simple maths; if developers stop building properties in Wandsworth as it's no longer sustainable/viable there will be less supply, therefore forcing up rental/purchase prices – the exact opposite of what this policy implementation is trying to achieve. 	
017	Sam Ball	<p>4. Strongly disagree</p> <p>5. 50% is far too much</p> <p>6. Disagree</p> <p>7. The change is too great</p> <p>8. Strongly disagree</p> <p>9. This will reduce the financial viability of small developments to the extent that developers will not renovate buildings that are clearly in need of work. This will lead to a greater number of unloved, derelict properties in the borough.</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable and will not have a negative impact on the provision of other tenures.</p>
018	Rose Barker	<p>4. Strongly disagree</p> <p>5. 50% is far too much, it will only push up extortionate rental prices further</p> <p>6. Disagree</p> <p>7. Too high of percentage</p> <p>8. Strongly disagree</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable and will not have</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>9. As per my comments above, this is too aggressive and will only send the housing market both sales and rentals into a mess and cause great loss to our economy</p>	<p>a negative impact on the provision of other tenures.</p>
019	<p>Mark Barocas, Nutbrook Development Group Ltd</p>	<p>4. Strongly disagree</p> <p>5. I strongly believe this not sustainable for SME developers and will reverse what you are trying to achieve</p> <p>6. Disagree</p> <p>7. Again, this makes development projects unviable, unless there is some sort of assistance from the government</p> <p>8. Strongly disagree</p> <p>9. I believe the big home builders should be providing more affordable homes and it shouldn't impact the smaller developers as it makes projects unviable.</p> <p>10. Overview: I believe if you want to impose something like this, there needs to be proper consultation with the people this will be impacting and who are doing small developments - small and medium developers in Wandsworth. I am all about providing affordable housing as I know there is a huge demand for it and it needs to be addressed. However, imposing 50% affordable housing on new schemes will have the reverse affect on what is trying to be achieved unless there is some sort of incentive or assistance from the government.</p> <p>The below assumes no incentives or assistance from the government.</p> <p>Financial viability:</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>Developers in Wandsworth already struggle to make developments work financially with the very high capital values in the Borough. To then decrease the developers profit will fully disincentivise anybody to do any sort of building below 10 units (if they don't go bust in the process). As mentioned before, the council needs to have an open discussion with developers to come up with an incentive scheme to enable/want them to build more affordable homes. Some examples 1) If you provide X or more affordable houses, you will be exempt from SDLT. 2) If you build more than X affordable homes, the council/government will give you a grant of X.</p> <p>Housing numbers: Let's do a rough example to illustrate the impact. There are roughly 30-50 active SME developers operating in Wandsworth (this should be clear from the objections). Each developer develops 3-9 houses per year. So 30 x 6(average) = 180. There will be 180 less houses in the borough every year. That may not sound like a lot but that is best case realistically it is more like 250-300. Our company alone has brought 20 new flats to the market in the last year. Basic economics tells us that with this shortage of supply, demand will increase and so will the prices of property in the borough. This will price out more people and in turn exacerbate the problem. The affect this will have on the rental market too.</p> <p>Planning implications: Implementing Affordable Housing for small schemes will substantially delay the decision period due to the negotiation period with legals. Currently we enjoy decisions in 8-12 weeks but this could increase to 70 weeks (according to the Budget, this is something the government is trying to reduce to get houses built) The Planning Inspector who forced Lambeth to drop their Affordable Housing contributions for under 10 units which they were going to implement in their Sept 2021 Local Plan stated taking a sample of 60 schemes for minor developments the decision period took an average of 71 weeks due to the negotiation process of Affordable Homes Contributions. Example where this is currently happening is</p>	

Rep No.	Respondent Name	Comments	Officer's Response
		Southwark Council with over 100 small site schemes currently sitting in limbo awaiting their Affordable sites to be sorted out.	
020	Battersea Society	<p>We support the three aims set out for the Partial Review of the Local Plan, and we recognise the urgency that has led to the Review. But we would welcome the opportunity to discuss key aspects of all three aims together with the exploration of some topics not covered in this. Our concerns cover:</p> <p>50% affordable homes: Given government policy (reviewed at Appendix), we would welcome the opportunity to discuss with the Council the mechanisms it might use to fulfil its requirement. We should also welcome clarification on whether the requirement includes provision of affordable supported housing.</p> <p>Housing Needs Assessment (HNA) this, which underpinned the policies in the current Wandsworth Local Plan, was itself based on evidence now many years out-of-date (notably the 2011 census). We should like to know what plans the Council has to update the HNA</p> <p>London Affordable Rent (LAR): We would welcome clarification on whether LAR would be included in the proposed social rent requirement. We would also welcome clarification on what intermediate products the Council might aim at, particularly in light of the Government's requirement set in Planning Practice Guidance in 2021, that 25% of affordable homes delivered by developers should be First Homes for sale to first-time buyers at a discount of 30%.</p> <p>We believe that neither that scheme nor Discounted Market Rent can meet the needs of current and potential residents in Wandsworth; and that the requirement should therefore specify genuinely affordable housing such as London Living Rent.</p> <p>Reducing the 10 homes threshold: we would welcome discussion with the Council on whether the sliding scale of contributions from developments on sites below the threshold of 'capable of ten or more units' adopted in the Local Plan for</p>	<p>Comments noted.</p> <p>More information on the mechanisms proposed by the Council to fulfil the proposed policy requirements will be published and consulted on following the collection of evidence and policy testing.</p> <p>The Council will be collecting and testing evidence to support policy changes, including an updated Housing Needs Assessment.</p> <p>Evidence provided by the updated Housing Needs Assessment will be tested as part of the viability testing process ahead of policy formulation.</p> <p>The Council will provide additional information on how proposed policy amendments will apply to different types of schemes including Built to Rent and Co-Living and ahead of the Regulation 19 consultation.</p> <p>In respect of Policy LP24, the Council will consider the outcomes of the evidence gathering and policy formulation on other policies and is mindful of the scope of the Local Plan Partial Review.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>Richmond, or some other mechanism, might be the best approach in Wandsworth.</p> <p>This is set against the background of the small sites' assumption in the Housing Needs Assessment in 2021 to provide 10% of new housing which the Local Plan increased to 20%. The London Plan allows boroughs to require affordable housing on such sites and we recognise the importance of so doing when such a high proportion of all new housing is expected to be on small sites.</p> <p>Housing Mix, LP24 While we recognise that the scope of the Review is limited essentially to policy LP23 in the Local Plan approved in July, we regret that the opportunity has not been taken to review policy LP 24 on housing mix and we should like to discuss this.</p> <p>Housing Needs Assessments are highly sensitive to the assumptions made, not least those about the occupancy of housing stock. They also focus on a one-way relationship between demand and supply, failing to acknowledge that the relationship in fact works both ways: supply almost invariably has an impact on demand. The result is that the demand for small units, rather than housing for growing families, is significantly over-stated. Over-provision of small units has played a significant part in stimulating the high levels of inward and outward migration, especially by young adults, and this is incompatible with the Council's aim to 2 establish stable neighbourhoods and balanced, cohesive communities. We believe that the policy of focusing new housing provision, especially for the affordable housing sector, on one-bedroom and two-bedroom units is perverse.</p> <p>Other issues: The information provided so far does not cover important issues covering:</p> <ul style="list-style-type: none"> • allowable levels of service charges for both social rent and other tenures; • how the policies might apply to Build to Rent schemes, or more specialist developments such as Co-Living; • the implications for estate redevelopments. 	

Rep No.	Respondent Name	Comments	Officer's Response
		We would welcome clarification and further discussion on all these issues.	
021	Daniel Batterton, Legal and General	<p>4. Strongly disagree</p> <p>5. It simply makes new investment and development into the Borough as unviable and unattractive option. As a UK and global investor Wandsworth is no longer an attractive place to invest.</p> <p>6. Strongly disagree</p> <p>7. As above. These homes are loss leading for an investor/developer. Whilst we support the desire to increase the supply of affordable housing this will result in a reduction in supply.</p> <p>8. Strongly disagree</p> <p>9. As above this will result in a reduction on all tenures, the increased complexity will put off smaller investors.</p> <p>10. Having invested £500m into the Borough to deliver over 1,000 private for rent and Affordable housing, the revised policy will mean we will focus future investment elsewhere in the UK. We have no need to invest into Wandsworth and the proposed changes make the development of new homes in Wandsworth more complex and risky relative to elsewhere in London and elsewhere across the UK.</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable and will not have a negative impact on the provision of other tenures.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p>
022	Mark Belsham, Eddisons	<p>4. Strongly disagree</p> <p>5. Small schemes will be uneconomic so the supply of new homes will be reduced.</p> <p>6. Neither agree nor disagree</p> <p>8. Strongly disagree</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		9. This will take out small schemes from the supply of new homes	
023	Jonathan Blathwayt, GLA	<p>Thank you for consulting the Mayor of London on Wandsworth's Local Plan Partial Review (the Review). As you are aware, all Development Plan Documents in London must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004 (PCPA 2004).</p> <p>The Mayor has afforded me delegated authority to make detailed comments which are set out below.</p> <p>Affordable Housing</p> <p>The Mayor welcomes Wandsworth's aim to increase the amount of affordable housing achieved through residential development. This is in line with Policy H4 of the London Plan 2021 which sets out the strategic target for 50 per cent of all new homes delivered in London to be genuinely affordable. However, any changes to Wandsworth's affordable housing policy needs to take account of the Threshold approach as set out in Policy H5 in the London Plan.</p> <p>The Threshold Approach seeks to limit those circumstances where viability evidence is required as part of residential planning proposals by providing the incentive for developers to achieve at least the minimum level of affordable housing to qualify for the Fast Track Route, thereby avoiding scrutiny of viability at various stages of development. The threshold approach has been informed by viability testing and embeds affordable housing requirements into land values which creates consistency across London.</p> <p>The policy has proven effective at securing affordable housing, with the Affordable Housing and Planning Applications Referred to the Mayor of London report published in May 2023 showing that 84 per cent of all strategic applications provided at least 35 per cent affordable housing, representing an increase from 53 per cent of schemes in 2018. The average rate of affordable homes per scheme was 41 per cent of all units and 45 per cent of all habitable</p>	<p>Comments noted.</p> <p>The Council will consider the policy's relationship with the threshold approach and London Plan policy. The Council will be working with the GLA and other bodies to ensure that the policy is in conformity with other planning documents and guidelines and is justifiable and evidenced.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>rooms – again representing a significant increase.</p> <p>Policy H5 of the London Plan sets the thresholds of affordable housing and the requirements needed to qualify for the Fast Track Approach. A Development Plan Document that seeks a lower or higher level or alters the requirements may potentially not be in general conformity with the London Plan if it cannot provide strong evidence to underpin the approach and provide confidence that it would be feasible in practice.</p> <p>Without robust viability evidence, tested on realistic typologies, Development Plans that seek a threshold level above that set in the London Plan actually risk delivering less affordable housing as more developments fall into the Viability Tested Route.</p> <p>Tenure Split The proposed split of 70/30 in favour of social rent set out in the partial review is in line with Policy H6 of the London Plan and is supported by the Mayor.</p> <p>Small sites The Mayor supports the introduction of seeking affordable housing contributions on sites fewer than 10 units where there is evidence that this is viable.</p>	
024	Gavin Bradley, Southgold Limited	<p>4. Strongly disagree</p> <p>5. 50% too much</p> <p>6. Disagree</p> <p>7. again too much</p> <p>8. Strongly disagree</p> <p>9. This would make construction unviable</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation.</p>

Rep No.	Respondent Name	Comments	Officer's Response
025	Mark Breen, Artesian Property Partnership	<p>4. Strongly agree</p> <p>5. 50% is not practical below 10 units. Housing associations do not want to manage single isolated units as it is inefficient and uneconomical</p> <p>6. Strongly agree</p> <p>7. N/A just experience and common sense</p> <p>8. Strongly agree</p> <p>9. 50% is not practical below 10 units. Housing associations do not want to manage single isolated units as it is inefficient and uneconomical</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p>
026	Richard Breen, Dallington properties ltd	<p>4. Strongly disagree</p> <p>5. The planning process will have to be much longer to take into account legals dealing with your 50-50 idea very few developers will be able to afford your 50-50 idea leading to less properties being built. It is altogether just a political stance with no commercial basis</p> <p>6. Agree</p> <p>7. All new affordable homes should be affordable, obvious, who wrote this? However, you build them on your land or make big developers do it, not little people building less than 10 homes!</p> <p>8. Strongly disagree</p> <p>9. As explained above</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p>
027	Mark Breen	4. Strongly disagree	Comments noted.

Rep No.	Respondent Name	Comments	Officer's Response
		<p>5. 50% threshold seems to high, especially when considering smaller developments of single figure number of units. It will render these development sites unviable, and risking under development generally</p> <p>6. Neither agree nor disagree</p> <p>8. Strongly disagree</p>	<p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable and will not have a negative impact on the provision of other tenures.</p>
028	Moses Breuer, E18 estates Limited	<p>4. Strongly disagree</p> <p>5. 50% is far too much, it will kill the construction of new homes which will further increase demand and house prices</p> <p>6. Disagree</p> <p>7. Same as before far too much %</p> <p>8. Strongly disagree</p> <p>9. Implementing Affordable Housing will substantially delay the decision period due to the negotiation period with legals, currently we enjoy decisions in 8-12 weeks but this could increase to 70 weeks. The Planning Inspector who forced Lambeth to drop their Affordable Housing contributions for under 10 units which they were going to implement in their Sept 2021 Local Plan stated taking a sample of 60 schemes for minor developments the decision period took an average of 71 weeks due to the negotiation process of Affordable Homes Contributions. Example where this is currently happening is Southwark Council with over 100 small site schemes currently sitting in limbo awaiting their Affordable sites to be sorted out. Above will only clog up the Planning system further which still hasn't recovered to the standard assessment period of 8 weeks we enjoyed pre-covid. Financial viability; holding costs of land at present is unsustainable with interest rates at a 15 year high, on a £1 million property which</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>is pretty standard in Wandsworth developers are easily paying £12K month in interest waiting for a planning decision, if this increases from an average of 12 weeks to a possible of 70 weeks this alone will make development in the borough unsustainable. Financial viability; costs of achieving planning permission has risen sharply recently due to stricter sustainability and biodiversity policies implemented. All developments now need to include green/brown roofs, air/ground source heat pumps, photovoltaics, enhanced building insulation, the associated costs of installing all these measures has pushed up building costs considerably on top of the increased material/labour costs since Brexit/Covid. If it becomes too expensive for developers to develop in Wandsworth the derelict/run down sites dotted around the borough will not get developed and regenerated which will have a knock on effect on the surrounding street scene and in five years' time Wandsworth will look a very different borough from today with many rundown/derelict buildings/sites around the borough that are not financially viable to regenerate. Simple maths; if developers stop building properties in Wandsworth as it's no longer sustainable/viable there will be less supply, therefore forcing up rental/purchase prices – the exact opposite of what this policy implementation is trying to achieve.</p>	
029	Darryl Broughton, Pad 365 limited	<p>4. Agree</p> <p>5. We agree that affordable housing is required within the borough but the burden should fall on larger development sites of 10+ units where it is more financially viable to provide these units.</p> <p>6. Agree</p> <p>7. Again we agree that 70/30 split is fair for larger 10+ unit schemes however is not financially viable for these smaller developments</p> <p>8. Strongly disagree</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. The Council will test and consider the impact of any policy changes on other aspects of the planning application process.</p> <p>Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>9. Our main objections again are:</p> <ul style="list-style-type: none"> • Implementing Affordable Housing will substantially delay the decision period due to the negotiation period with legals, currently we enjoy decisions in 8-12 weeks but this could increase to 70 weeks. The Planning Inspector who forced Lambeth to drop their Affordable Housing contributions for under 10 units which they were going to implement in their Sept 2021 Local Plan stated taking a sample of 60 schemes for minor developments the decision period took an average of 71 weeks due to the negotiation process of Affordable Homes Contributions. Example where this is currently happening is Southwark Council with over 100 small site schemes currently sitting in limbo awaiting their Affordable sites to be sorted out. • Above will only clog up the Planning system further which still hasn't recovered to the standard assessment period of 8 weeks we enjoyed pre-covid. • Financial viability; holding costs of land at present is unsustainable with interest rates at a 15 year high, on a £1 million property which is pretty standard in Wandsworth developers are easily paying £12K month in interest waiting for a planning decision, if this increases from an average of 12 weeks to a possible of 70 weeks this alone will make development in the borough unsustainable. • Financial viability; costs of achieving planning permission has risen sharply recently due to stricter sustainability and biodiversity policies implemented. All developments now need to include green/brown roofs, air/ground source heat pumps, photovoltaics, enhanced building insulation, the associated costs of installing all these measures has pushed up building costs considerably on top of the increased material/labour costs since Brexit/Covid. • If it becomes too expensive for developers to develop in Wandsworth the derelict/run down sites dotted around the borough will not get developed and regenerated which will have a knock on effect on the surrounding street scene and in five years' time Wandsworth will look a very different borough from today with many rundown/derelict buildings/sites around the borough that are not financially viable to regenerate. 	<p>managing the expectations of those engaging with the planning system. It will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p> <p>Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable and will not have a negative impact on the provision of other tenures.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<ul style="list-style-type: none"> • Simple maths; if developers stop building properties in Wandsworth as it's no longer sustainable/viable there will be less supply, therefore forcing up rental/purchase prices – the exact opposite of what this policy implementation is trying to achieve. 	
030	Harry Brunt, Lightbox	<p>4. Strongly disagree</p> <p>6. Disagree</p> <p>8. Strongly disagree</p> <p>9. The intentions are good, but the consequences will be undesirable. Developing is already challenging financially. The reality is that when you tax development more, AUVs (i.e. as residential development land) are simply reduced, and therefore fewer sites are viable and will come forward for development. The result of this type of policy would be to reduce planning consents and reduce the number of homes that will be delivered. In practise it will generate virtually no meaningful amount of AFH. If the purpose is purely for optics then I can see why the policy would be adopted, but if the council genuinely care about encouraging delivery of homes on small sites then this policy should be abandoned. Lambeth tried it and it didn't work. Southwark are trying it, and it's not working.</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable and will not have a negative impact on the provision of other tenures.</p>
031	Richard Buxton	<p>4. Strongly disagree</p> <p>5. Too strict</p> <p>6. Disagree</p> <p>7. Too expensive</p> <p>8. Strongly disagree</p> <p>9. To restrictive</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes.</p>

Rep No.	Respondent Name	Comments	Officer's Response
032	Hyacynth Cabiles, NHS Property Services Ltd	<p>Existing, Policy LP23 Affordable Housing (Strategic Policy) within the adopted Wandsworth Local Plan 2023-2038 (2023) seeks to maximise and ensure accessibility to affordable housing for all residents in the borough. One of the ways in which is through taking opportunity of public sector land and supporting proposals where a proportion of delivered homes are set aside for essential workers.</p> <p>NHSPS supports this policy on the basis that it seeks to maximise the delivery of affordable housing in the borough but encourage the Council to also consider how existing housing affordability issues for NHS workers as essential workers can be addressed through planning policy.</p> <p>Context A wider, and increasingly prominent area of focus for the NHS is to explore ways in which affordable homes for NHS staff can be planned and delivered. Independent research undertaken by Price Waterhouse Coopers (UK Economic Outlook, July 2019) identified a significant issue with housing affordability for NHS workers that is having a strong bearing on staff retention, commute times and morale.</p> <p>While the policy makes mention of supporting proposals for housing on public sector land which also dedicates a proportion of its housing for essential workers, it is our suggestion that provision of affordable housing for Key Workers, of which NHS workers are specifically identified, to be made a priority.</p> <p>The NHS advise that 'Homes for NHS Staff' should be a priority focus of the affordable housing provision where there is demand identified, such as in close proximity to key healthcare sites. Specifically, a portion of affordable housing could include a first right of refusal for NHS staff where there is a demonstrable need. We would welcome further discussion on this as a potential approach, along with other solutions to the issue of affordable homes for NHS staff as the Local Plan is developed further.</p>	<p>Comments noted.</p> <p>The Council recognise the need to provide affordable homes for healthcare staff and this will be noted in the tender brief for the Housing Needs Assessment which will deliver evidence to support policy amendments and inform ways in which The Council might deliver affordable homes for healthcare staff.</p> <p>The Council will be seeking to update the January 2022 Porter Planning Economics report alongside an update of the Local Housing Needs Assessment, which will consider changes in the economy, and in housing need, in the intervening period. The Housing Needs Assessment will outline need for homes for healthcare staff in the Borough so that scenarios can be tested in the Viability Assessment.</p>

Rep No.	Respondent Name	Comments	Officer's Response
033	Andrew Caracciolo	<p>4. Strongly disagree</p> <p>5. Will make all small scale development uneconomic. This will then not be built and cause more pressure on housing supply</p> <p>6. Disagree</p> <p>7. Again far too much - not economical for a developer to build in the borough</p> <p>8. Strongly disagree</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable and will not have a negative impact on the provision of other tenures or on small sites.</p>
034	Richard Carr, Transport for London	<p>Thank you for consulting Transport for London (TfL) on the partial review of Wandsworth's Local Plan. I can confirm that we have no comments to make on the proposed review and update of Policy LP23 Affordable Housing. Places for London may wish to respond separately in their capacity as a landowner and potential developer</p>	<p>No response required.</p>
035	Sarah Chapman, Wandsworth Foodbank	<p>4. Agree</p> <p>5. At Wandsworth Foodbank, we regularly see the impact of lack of local affordable housing (particularly social housing), with families and vulnerable individuals needing to be placed in emergency or temporary accommodation because there is not enough social housing available. This makes it difficult for individuals and families to plan their lives and thrive.</p> <p>6. Strongly agree</p> <p>7. Again, there is such a lack of social rented properties and such a high number of statutorily homeless individuals and families, that it's vital more suitable accommodation is built locally. 'Affordable' rents are out of reach for so many people, that social rents are needed.</p> <p>8. Neither agree nor disagree</p>	<p>Support noted.</p>

Rep No.	Respondent Name	Comments	Officer's Response
036	Mustaque Choudhury	<p>4. Strongly disagree</p> <p>5. 50% is too much</p> <p>6. Disagree</p> <p>7. Again too much</p> <p>8. Strongly disagree</p> <p>9. if developers stop building properties in Wandsworth as it's no longer sustainable/viable there will be less supply, therefore forcing up rental/purchase prices – the exact opposite of what this policy implementation is trying to achieve.</p> <p>10. Additional comments Above will only clog up the Planning system further which still hasn't recovered to the standard assessment period of 8 weeks we enjoyed pre-covid.</p> <p>Financial viability; holding costs of land at present is unsustainable with interest rates at a 15 year high, on a £1 million property which is pretty standard in Wandsworth developers are easily paying £12K month in interest waiting for a planning decision, if this increases from an average of 12 weeks to a possible of 70 weeks this alone will make development in the borough unsustainable.</p> <p>Financial viability; costs of achieving planning permission has risen sharply recently due to stricter sustainability and biodiversity policies implemented. All developments now need to include green/brown roofs, air/ground source heat pumps, photovoltaics, enhanced building insulation, the associated costs of installing all these measures has pushed up building costs considerably on top of the increased material/labour costs since Brexit/Covid.</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable and will not have a negative impact on the provision of other tenures. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>If it becomes too expensive for developers to develop in Wandsworth the derelict/run down sites dotted around the borough will not get developed and regenerated which will have a knock on effect on the surrounding street scene and in five years' time Wandsworth will look a very different borough from today with many rundown/derelict buildings/sites around the borough that are not financially viable to regenerate.</p> <p>Simple maths; if developers stop building properties in Wandsworth as it's no longer sustainable/viable there will be less supply, therefore forcing up rental/purchase prices – the exact opposite of what this policy implementation is trying to achieve.</p>	
037	Edward Church, London Heritage Properties	<p>I make my representation in relation to Paragraph 3, Policy LP23 in relation to small sites.</p> <p>I am an Architect/Developer who has been developing in Wandsworth for nearly 25 years and have produced over 160 flats and houses. We currently have 37 rental properties with over 100 tenants.</p> <p>Most of our developments have been on sites producing 3-5 units.</p> <p>It is just nonsense to expect small sites of below 10 units to provide affordable housing, it is just not economically viable.</p> <p>I thought the figure of 9 units or less with no affordable housing was required and this should stand, even more so if they were conversions.</p> <p>I also believe such sites should be free of CIL, such conversions attract VAT at 20%.</p> <p>Normally on such conversions of less than four units, the CIL is 20% of the profit. Lay people and the Councillors must also 'wake up' to such conversions being half the carbon footprint of a new build, and on our contracts where we use Timber Frame, water content is 10% of a new build. Moreover, we also retain and improve the Victorian Architecture.</p> <p>Unfortunately what Wandsworth Council are building are very unattractive new builds all constructed with concrete, the worst building material for Carbon</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable and will not have a negative impact on the provision of other tenures. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>Footprint. Surely they should build in Timber Frame, it is possible to build ten storeys.</p> <p>The Councillors should be aware that in 2008 there were 12,500 small developers/builders, since the crash in 2008 10,000 have disappeared and led to the big eight national home builder to have more of a monopoly and dictate house building.</p>	
038	<p>Nigel Coleman, Oakman Architecture Ltd</p>	<p>4. Strongly disagree</p> <p>5. Financial viability; holding costs of land at present is unsustainable with interest rates at a 15 year high, on a £1 million property which is pretty standard in Wandsworth developers are easily paying £12K month in interest waiting for a planning decision, if this increases from an average of 12 weeks to a possible of 70 weeks this alone will make development in the borough unsustainable.</p> <p>6. Strongly disagree</p> <p>7. ; if developers stop building properties in Wandsworth as it's no longer sustainable/viable there will be less supply, therefore forcing up rental/purchase prices – the exact opposite of what this policy implementation is trying to achieve.</p> <p>8. Strongly disagree</p> <p>9. Simply unattainable , no small medium developer will be able to operate in LB Wandsworth. If it becomes too expensive for developers to develop in Wandsworth the derelict/run down sites dotted around the borough will not get developed and regenerated which will have a knock on effect on the surrounding street scene and in five years' time Wandsworth will look a very different borough from today with many rundown/derelict buildings/sites around the borough that are not financially viable to regenerate.</p> <p>10. Implementing Affordable Housing will substantially delay the decision period due to the negotiation period with legals, currently we enjoy decisions in 8-12</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified, viable and provides an adequate level of clarity as not to cause disputes around land value.</p> <p>This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>weeks but this could increase to 70 weeks. The Planning Inspector who forced Lambeth to drop their Affordable Housing contributions for under 10 units which they were going to implement in their Sept 2021 Local Plan stated taking a sample of 60 schemes for minor developments the decision period took an average of 71 weeks due to the negotiation process of Affordable Homes Contributions. Example where this is currently happening is Southwark Council with over 100 small site schemes currently sitting in limbo awaiting their Affordable sites to be sorted out.</p> <p>Above will only clog up the Planning system further which still hasn't recovered to the standard assessment period of 8 weeks we enjoyed pre-covid.</p> <p>Financial viability; holding costs of land at present is unsustainable with interest rates at a 15 year high, on a £1 million property which is pretty standard in Wandsworth developers are easily paying £12K month in interest waiting for a planning decision, if this increases from an average of 12 weeks to a possible of 70 weeks this alone will make development in the borough unsustainable.</p> <p>Financial viability; costs of achieving planning permission has risen sharply recently due to stricter sustainability and biodiversity policies implemented. All developments now need to include green/brown roofs, air/ground source heat pumps, photovoltaics, enhanced building insulation, the associated costs of installing all these measures has pushed up building costs considerably on top of the increased material/labour costs since Brexit/Covid.</p> <p>If it becomes too expensive for developers to develop in Wandsworth the derelict/run down sites dotted around the borough will not get developed and regenerated which will have a knock on effect on the surrounding street scene and in five years' time Wandsworth will look a very different borough from today with many rundown/derelict buildings/sites around the borough that are not financially viable to regenerate.</p> <p>Simple maths; if developers stop building properties in Wandsworth as it's no longer sustainable/viable there will be less supply, therefore forcing up rental/purchase prices – the exact opposite of what this policy implementation is trying to achieve.</p>	

Rep No.	Respondent Name	Comments	Officer's Response
039	Michael Collins, Goldcrest Custom Homes Ltd	<p>4. Strongly disagree</p> <p>5. This will cause exceptional delays in supplying much-needed housing</p> <p>6. Strongly disagree</p> <p>7. Social rented housing is desirable but to increase the percentage would reduce the amount of social housing available because of the impact it will have on viability assessments</p> <p>8. Strongly disagree</p> <p>9. This will reduce the number of small sites coming forward, because it will compromise viability and encourage the development of a small sites for other land uses</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p>
040	Ailish Collins, Rolfe Judd Planning obo Downing	<p>We write to make representations on the London Borough of Wandsworth's Local Plan Partial Review – Regulation 18 Version. These comments seek to build on the substantial engagement between the Council and Downing during the previous consultation events for the recently adopted Wandsworth Local Plan (July 2023).</p> <p>Downing have a significant interest in the Site Allocation WT4: Gasholder Cluster in particular the land at '2 Armoury Way' at the southern end of the site allocation. They are therefore intrinsically interested in the policy direction for this area and the Wider Borough to ensure these changes are appropriate.</p> <p>In terms of plan-making, the National Planning Policy Framework (NPPF 2023) is clear that the "planning system should be genuinely plan-led" (para 15) and to this end Plans should:</p> <ul style="list-style-type: none"> • "be prepared positively, in a way that is aspirational but deliverable" (para 15b). • "contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals" (para 15c). 	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council will be seeking to update the January 2022 Porter Planning Economics report alongside an update of the Local Housing Needs Assessment, which will consider changes in the economy, and in housing need, in the intervening period.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>Para 31 goes onto state that “The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals”.</p> <p>We note that the Reg 18 Consultation forms a Partial Review of the recently adopted Local Plan and seeks to update Policy LP23 Affordable Housing. However, the Notice of Consultation does not provide any amended wording for policy LP23 or indication as to how applicants would apply the proposed amendments. Rather the Notice of Consultation indicates a series of broad Policy aspirations, but with know meaningful clarification as to how any amended Policy would be applied.</p> <p>In our view, the Notice of Consultation falls short of meeting the guidance set out within the NPPF.</p> <p>Furthermore, the Council has failed to provide an evidence base – relative to housing need within the Borough and the viability/deliverability of any amendment to Policy LP23.</p> <p>The Council have just completed the adoption of their Local Plan – EiP and evidence base –including viability and housing need, in support of their affordable housing targets. However, the Consultation document provides no explanation of the circumstances which have changed (within the evidence base or market conditions) to support the change in policy direction from the adopted position, which went through substantial engagement up to early 2022. Downing actively participated in each consultation stage of the Local Plan review including submission of representations and speaking at the Hearing Sessions.</p> <p>To this end we have concerns regarding the content of the current consultation on the Local Plan Partial Review, specifically whether the proposed changes have</p>	<p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The WBC Transport Committee considered a paper on 21st September 2021 which detailed the reasoning behind The Council’s decision to progress to Regulation 18 on the partial review of the Local Plan. Minutes from the WBC Transport Committee meeting on Thursday 21st September can be viewed publicly here.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>been considered relative to delivery. LB Wandsworth has an ambition housing target of 1,950 homes per annum. The new policy approach increasing the overall affordable homes requirements and amending the preferred housing tenure mix raise significant concerns regarding the attainability of that target.</p> <p>In Downing's case, the Site Allocation WT4 already requires the re-provision of 125% of economic uses on site within any redevelopment proposals (in line with the requirements of the Economic Use Intensification (EUIA) designation), as well as the other Site Allocation requirements such as maximum building heights and provision of a linear park. This, compounded with a requirement for 50% affordable housing on site as proposed by the amendments to policy LP23, is overly onerous and unlikely to bring forward a viable development.</p> <p>The Council previously commissioned a whole Local Plan Viability Review to support the current Local Plan. This is dated 2021 with evidence from the proceeding years. Since this point, the Building Cost Information Service (BCIS) All in Tender Price Index (a key measurement of construction costs), has increased by circa 10%. Combined with recent interest rates rises by the Bank of England and stagnating house prices, even when reassessing the same policy approach; it would likely show an overall detriment to viability.</p> <p>It is readily apparent that this test within the NPPF has not been met as part of the Local Plan Partial Review. As an absolute minimum we strongly suggest that as part of any future consultation on the partial review the Council prepares and consults upon detailed supporting viability evidence. The creation of new planning policy should be evidence led and without this it can only be determined that the plan would be unsound.</p> <p>Overall, we consider that the approach for increasing affordable homes within the Borough to be overly ambitious and lacks sufficient evidence to support deliverability and to show that this target is attainable. Without this evidence the</p>	

Rep No.	Respondent Name	Comments	Officer's Response
		<p>Council cannot appreciate the wider implications of this approach, notably in relation to its strategic housing targets.</p> <p>We trust the contents of this letter are self-explanatory and we look forward to engaging with the Council further on the formation of the Partial Review</p>	
041	Ahmed Collins, Goldcrest Land	<p>4. Strongly disagree</p> <p>5. make viability of developments impossible and slow the process to planning greatly</p> <p>6. Strongly disagree</p> <p>7. Again will make schemes unviable</p> <p>8. Strongly disagree</p> <p>9. sites will not come forward for development because of lack of viability</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable and will not have a negative impact on the provision of other tenures.</p>
042	Jonathan Collyear	<p>I couldn't help but write in to comment when I read your article in the Brightside Magazine.</p> <p>I' sorry but mandating developers to have 50% affordable homes is madness - this is basic economics. This will mean that Wandsworth is less attractive for developers - so less affordable or social homes will be built.</p> <p>There are so many studies that show the total number of houses built, not the number of social or affordable houses, has the biggest impact on house prices (EA033.pdf (lse.ac.uk)) So therefore pro building planning tweaks will have the biggest impact on house prices. Look what has happened in some american cities where they have liberalised planning regulations - this has subsequently had huge impacts on making housing more affordable.</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of</p>

Rep No.	Respondent Name	Comments	Officer's Response
		As a house owner I want others to have the privilege to and the best way for that to happen is for more homes to be built - increasing the restrictions on developers will have the opposite effect.	the Council whilst also managing the expectations of those engaging with the planning system.
043	Nathan Cooke, Silvercrow Ltd	<p>4. Strongly disagree</p> <p>5. 50 % too much affordable housing</p> <p>6. Disagree</p> <p>8. Strongly disagree</p> <p>9. Implementing Affordable Housing will substantially delay the decision period due to the negotiation period with legals, currently we enjoy decisions in 8-12 weeks but this could increase to 70 weeks. The Planning Inspector who forced Lambeth to drop their Affordable Housing contributions for under 10 units which they were going to implement in their Sept 2021 Local Plan stated taking a sample of 60 schemes for minor developments the decision period took an average of 71 weeks due to the negotiation process of Affordable Homes Contributions. Example where this is currently happening is Southwark Council with over 100 small site schemes currently sitting in limbo awaiting their Affordable sites to be sorted out. Above will only clog up the Planning system further which still hasn't recovered to the standard assessment period of 8 weeks we enjoyed pre-covid. Financial viability; holding costs of land at present is unsustainable with interest rates at a 15 year high, on a £1 million property which is pretty standard in Wandsworth developers are easily paying £12K month in interest waiting for a planning decision, if this increases from an average of 12 weeks to a possible of 70 weeks this alone will make development in the borough unsustainable. Financial viability; costs of achieving planning permission has risen sharply recently due to stricter sustainability and biodiversity policies implemented. All developments now need to include green/brown roofs, air/ground source heat pumps, photovoltaics, enhanced building insulation, the</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>associated costs of installing all these measures has pushed up building costs considerably on top of the increased material/labour costs since Brexit/Covid. If it becomes too expensive for developers to develop in Wandsworth the derelict/run down sites dotted around the borough will not get developed and regenerated which will have a knock on effect on the surrounding street scene and in five years' time Wandsworth will look a very different borough from today with many rundown/derelict buildings/sites around the borough that are not financially viable to regenerate. Simple maths; if developers stop building properties in Wandsworth as it's no longer sustainable/viable there will be less supply, therefore forcing up rental/purchase prices – the exact opposite of what this policy implementation is trying to achieve.</p>	
044	Julian Cookson, FOLIO	<p>4. Agree</p> <p>5. We agree that affordable housing is required within the borough but the burden should fall on larger development sites of 10+ units where it is more financially viable to provide these units.</p> <p>6. Agree</p> <p>7. Again we agree that 70/30 split is fair for larger 10+ unit schemes however is not financially viable for these smaller developments</p> <p>8. Strongly disagree</p> <p>9. The viability of smaller developments will be destroyed. It will no longer make financial sense to develop in the borough.</p>	<p>Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p>
045	Tim Costin, The Cherwell Group	<p>We agree with the principle of providing 50% affordable housing on site. However there are number of market constraints which are resulting in development sites being extremely difficult to stack up financially, namely:</p> <ul style="list-style-type: none"> • Increased construction costs. • Increased finance costs. • Sales demand and value. 	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>The difficulties to find viable development sites is worsened by the disconnect in land values between land owners aspirations and the true value, especially because land owners site values have reduced over recent years due to the external factors above, alongside the additional costs associated with the Community Infrastructure Levy (CIL).</p> <p>This issue is obviously amplified by increased affordable percentages. We feel that this will materially reduce the number of planning applications and in time developments coming forward.</p> <p>The viability process of using an existing use value as the benchmark value in a viability assessment also increases the likelihood of a development to be viable because generally landowners aspirations in terms of land value are generally a long way above the EUV, therefore a significant deficit can exist from the outset of any viability assessment. We have also experienced significant discontent from our funders in relation to late stage viability reviews.</p> <p>As a company operating within the Borough, we have always taken pride in being able to contribute towards housing and affordable housing delivery in the Borough to assist with meeting housing needs within London.</p> <p>We have also sought to be policy compliant or to exceed affordable housing requirements through our developments in percentage terms of affordable units where the site has been financially viable. Examples of this can be seen at 58-70 York Road (37% Affordable), Yelverton Road (50% Affordable) & 120 Battersea Bridge Road (37% Affordable).</p> <p>We continue to see the viability assessment process as being critical to support the delivery of the right amount of affordable housing on sites. However, a more efficient and streamlined viability assessment process would assist to support the planning system and the delivery of housing and affordable housing on sites.</p> <p>We strongly object to this proposal [<i>small sites</i>] and consider that this approach will work against the London Plan Policy H2 'Small Sites' which seeks to support small developers to bring forward housing delivery on small sites.</p>	<p>Council will be seeking to ensure that the policy is justified and viable. This will also include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>We feel that the introduction of this change will significantly reduce the viability of small sites within the Borough. The factors affecting the industry of high build costs, material inflation, finance costs and struggling demand / values are resulting in the small development opportunities which we have been looking at no longer being viable.</p> <p>On small sites suitable for less than 10 units they are normally constrained brown field sites which often results in higher build costs, contamination etc. When affordable provision is required the potential viability of such sites will be adversely impacted. Separately the sites may not have adequate core space to accommodate different affordable tenures. Additionally we have found that Housing Associations have limited interest in small on-site affordable allocations. Perhaps this change will have the reverse affect and reduce the number of small developments coming forward and new homes being delivered, contrary to the intention of Policy H2 and the NPPF and to the detriment of housing delivery and meeting housing need in London.</p> <p>The viability and delivery of small sites, which in our opinion are crucial to assisting in the delivery of new housing stock, will be crucified by this proposed change.</p>	
046	Suzy Crawford, BPSDC	<p>Partial Review of Wandsworth's Local Plan (2023-2038) - Summary</p> <p>The Partial Review includes a review and update of Policy LP23 (Affordable Housing), and other policies relating to strengthening provision of homes for social rent. Specifically:</p> <p>a) Local Plan Policy LP23 seeks to maximise affordable housing delivery to contribute towards the Mayor's strategic 50% target. For individual sites, the adopted plan adopts the Mayor's threshold approach which is set at 35% for private land and 50% for public land (on a habitable room basis).</p> <p><i>The Review seeks to require new housing developments in the borough to provide at least 50% of dwellings as affordable homes delivered on site.</i></p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>b) The adopted policy requires a tenure split of 50/50 low-cost rent to intermediate products. <i>The Review seeks to require a greater proportion of all new affordable homes to be genuinely affordable, preferably a 70/30 split in favour of social rent.</i></p> <p>c) The adopted policy requires affordable housing only on developments of 10 or more housing units. The Review seeks to require affordable housing from small sites below the current threshold of 10 or more homes (gross).</p> <p>BPSDC is the Development Manager on behalf of the owners of the Battersea Power Station ("BPS") site who are committed to completing its regeneration. Following 30 years of unsuccessful redevelopment attempts, planning permission was secured from Wandsworth Council for the comprehensive development of the site in 2011. In 10 years since purchasing the site, working closely with the Council and a wide range of other stakeholders, the Malaysian shareholders have delivered transformational change for Battersea, restoring the Grade II* Power Station as a new Town Centre, facilitating and contributing £325m towards the Northern Line Extension ("NLE"), and creating new homes and jobs that contribute to the local economy and community.</p> <p>BPS represents an example of the need to consider the individual context and characteristics of a site, to ensure that a site's commercial requirements work alongside the planning policy objectives. Individual aspects of development viability and value/cost assumptions need to be considered when assessing affordable housing provision, so that provision can be maximised and will come forward. This need was recognised as part of the assessment of the original masterplan application, and remains a key part of national, strategic and local policy to ensure that development remains viable and deliverable.</p> <p>The BPS masterplan has Outline Planning Permission and it is the intention of the site's owners to continue delivery of the remaining phases in accordance with that permission and its accompanying S106 legal agreement. These representations on the Local Plan Review are based on the experience of delivering a complex</p>	<p>collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The policy formulation process will account for implications on existing permissions, amendments to existing permissions and long-term schemes. A range of scenarios will be tested for viability as part of the policy formulation process.</p> <p>Once adopted, the revised policy will apply to all new planning applications including large-scale long-term developments. In the period ahead of adoption, proposals will be considered on a case-by-case basis in light of the evidence available at that time.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>real estate development in central London and in regard to the potential for future investment by the shareholders on non-BPS land within the borough.</p> <p>The Review proposes to require new housing developments to provide at least 50% of dwellings as affordable homes (delivered on site), with a tenure split of 70/30 in favour of social rent. We support in principle these targets amid the ongoing housing crisis and the continued demand for new homes across a range of tenures, meeting housing demand and improving the living standards for residents of the Borough. However, we strongly feel that development viability is critical to delivering these objectives in order to ensure new development is feasible and deliverable, and would encourage the Council to continue its track record of delivery through a pragmatic approach to planning. The forthcoming Local Plan Policy LP23 should reflect this approach.</p> <p>A further consideration is the way in which Local Plan Policy LP23 will be applied to amendments to existing planning permissions – in particular, for larger scale long-term developments such as BPS that are already underway. In these circumstances, we think it is essential to recognise the existing commercial position and ensure that the policy is applied in a way which maximises affordable housing delivery for new planning applications, whilst still allowing the development to continue.</p> <p>Concluding Thoughts</p> <p>To conclude, BPSDC remains committed to working with Wandsworth Council to complete the delivery of the BPS development and the wider regeneration of VNEB Opportunity Area. A new town centre is already taking shape at Battersea Power Station, delivering jobs, investment and new places for Borough residents, Londoners and visitors to enjoy, and we know that we can achieve even more 3 in the future. We trust that the comments set out in this letter will be taken into account in the preparation of the next stage of the policies</p>	

Rep No.	Respondent Name	Comments	Officer's Response
047	Dionne Davidson, Aja Parent Power Group	<p>4. Strongly agree</p> <p>5. I have been affect by the lack of scocial housing</p> <p>6. Strongly agree</p> <p>7. This would be a start to helping housing crisis.</p> <p>8. Strongly agree</p> <p>10. I would ask that Wandsworth make the housing register less institutional and biased as it is clear social cleansing is happening.</p>	Support noted.
048	Nicolas Davidson	<p>4. Strongly agree</p> <p>5. 50% is too much.</p> <p>6. Disagree</p> <p>7. This is again too much</p> <p>8. Strongly disagree</p> <p>9. I think such a policy would have unintended consequences. In the same way that landlords have been disincentivised and leave the Private Rental sector so that supply decreases and rents increase, so small developers will leave the market. When homes are needed most, there must be some incentive for developers to build them. Take that away and developers will not exit but change course and deliver for markets that incentivise them</p> <p>10. I simply reiterate my comments in point 10.</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p>
049	Justin Davies	4. Strongly disagree	Comments noted.

Rep No.	Respondent Name	Comments	Officer's Response
		<p>5. 50% is too high</p> <p>6. Strongly disagree</p> <p>7. 70/30 is too much</p> <p>8. Strongly disagree</p> <p>9. This would result in long delays in the planning approval process.</p>	<p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p>
050	<p>Lucien Davis, Craft Works Surrey Ltd</p>	<p>4. Strongly disagree</p> <p>5. this will make developments financially not viable for smaller developers and also lengthen the period for planning</p> <p>6. Disagree</p> <p>8. Strongly disagree</p> <p>9. it is just not feasible financially for small sites to provide affordable housing. the costs are just higher than what is "affordable". Unless the work is subsidized significantly the maths do not add up</p> <p>10. Above will only clog up the Planning system further which still hasn't recovered to the standard assessment period of 8 weeks we enjoyed pre-covid.</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>Financial viability; holding costs of land at present is unsustainable with interest rates at a 15 year high, on a £1 million property which is pretty standard in Wandsworth developers are easily paying £12K month in interest waiting for a planning decision, if this increases from an average of 12 weeks to a possible of 70 weeks this alone will make development in the borough unsustainable.</p> <p>Financial viability: costs of achieving planning permission has risen sharply recently due to stricter sustainability and biodiversity policies implemented. All developments now need to include green/brown roofs, air/ground source heat pumps, photovoltaics, enhanced building insulation, the associated costs of installing all these measures has pushed up building costs considerably on top of the increased material/labour costs since Brexit/Covid. Unless subsidised, the figures do not add up.</p> <p>If it becomes too expensive for developers to develop in Wandsworth the derelict/run down sites dotted around the borough will not get developed and regenerated which will have a knock on effect on the surrounding street scene and in five years' time Wandsworth will look a very different borough from today with many rundown/derelict buildings/sites around the borough that are not financially viable to regenerate.</p> <p>If developers stop building properties in Wandsworth as it's no longer sustainable/viable there will be less supply, therefore forcing up rental/purchase prices even more – the exact opposite of what this policy implementation is trying to achieve.</p> <p>You cannot force the private sector to fill in the gaps when the government does not build/encourage building. Looks at the opposite effect that rent control for example had in Scotland. The rent is not more affordable at all.</p>	<p>planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>
051	Jon Davis, Indigo Scott	4. Strongly disagree	Comments noted.

Rep No.	Respondent Name	Comments	Officer's Response
		<p>5. Simple viability given decreased sales costs, increased build costs and borrowing costs. Will turn small local developers away from the borough.</p> <p>6. Agree</p> <p>8. Strongly disagree</p> <p>9. Answer as above. SME Developers are already being squeezed out of the market due to costs and this will be the final nail in the coffin for us in Wandsworth.</p>	<p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p>
052	Cllr Aydin Dikerdem	<p>4. Strongly agree</p> <p>5. There is an acute shortage of social housing in Wandsworth and London and private development has historically in Wandsworth delivered very low numbers of affordable housing despite very profitable schemes and local housing market with high values.</p> <p>6. Strongly agree</p> <p>7. The absolute priority for 'affordable' housing delivery through S106 should be social housing</p> <p>8. Strongly agree</p> <p>9. All developers should be contributing towards affordable housing provision big or small</p> <p>10. Since 2010, statutory homelessness in Wandsworth has risen every year to 3600 households at the time of writing. The Councils waiting lists for social housing stands at 11,000 households. The UK has never faced a supply crisis of</p>	<p>Support noted.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		social housing like this. Councils are being crippled by associated costs of temporary accommodation. The Wandsworth Councils local plan should reflect this situation and the priorities of the Council to deliver social housing.	
053	Greg Dowden, Hotham Mews Holdings Ltd	<p>4. Strongly disagree</p> <p>5. These comments are made in respect of all consultation documents:</p> <p>1. This policy is directly contrary to government advice set out in the NPPF and conflicts with it.</p> <p>2. Implementing Affordable Housing will substantially delay the decision period due to the negotiation over viability and the time take to agree any s.106 agreement. Currently decisions take 8-12 weeks but experience shows that this could increase to 70 weeks. The Local Plan Inspector who forced Lambeth to drop their Affordable Housing contributions under a 10 unit threshold proposed in their Sept 2021 Local Plan stated that taking a sample of 60 schemes for minor developments the decision period took an average of 71 weeks due to the negotiation process associated with Affordable Housing Contributions.</p> <p>3. Experience shown that this policy only clogs up and slows down the Planning system further which still hasn't recovered to the standard assessment period of 8 weeks we enjoyed pre-covid.</p> <p>4. The policy takes no account of true commercial viability. Holding costs of land at present is unsustainable with interest rates at a 15 year high, and so on a £1 million property (which is pretty standard in Wandsworth) applicants are easily paying £12K per month in interest while waiting for a planning decision, if this increases from an average of 12 weeks to a possible of 70 weeks this alone will make development in the borough unsustainable.</p> <p>5. In addition to holding costs, the cost of achieving planning permission has risen sharply recently due to stricter sustainability and biodiversity policies, and increased planning application fees. All developments now need to include green/brown roofs, air/ground source heat pumps, photovoltaics, enhanced building insulation and the associated costs of installing all these measures has</p>	<p>Comments noted.</p> <p>The Council will consider the policy's relationship with national policies. The Council will be working with the appropriate bodies to ensure that the policy is in conformity with other planning documents and guidelines and is justifiable and evidenced.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>pushed up building costs considerably on top of the increased material/labour costs since Brexit/Covid.</p> <p>6. If it becomes too expensive for applicants to develop in Wandsworth sites will not come forward and the lack of regeneration will degrade the street scene and in five years' time Wandsworth will look a very different borough from today with many rundown/derelict buildings/sites blighting the borough because they are not financially viable to bring forward.</p> <p>7. In addition, if applicants stop building properties in Wandsworth as it's no longer sustainable/viable there will be less housing supplied. Not only will this forcing up rental/purchase prices, it will reduce the amount of affordable housing that comes forward and which is provided – the exact opposite of what this policy is trying to achieve.</p> <p>6. Disagree</p> <p>7. These comments are made in respect of all consultation documents:</p> <p>1. This policy is directly contrary to government advice set out in the NPPF and conflicts with it.</p> <p>2. Implementing Affordable Housing will substantially delay the decision period due to the negotiation over viability and the time take to agree any s.106 agreement. Currently decisions take 8-12 weeks but experience shows that this could increase to 70 weeks. The Local Plan Inspector who forced Lambeth to drop their Affordable Housing contributions under a 10 unit threshold proposed in their Sept 2021 Local Plan stated that taking a sample of 60 schemes for minor developments the decision period took an average of 71 weeks due to the negotiation process associated with Affordable Housing Contributions.</p> <p>3. Experience shown that this policy only clogs up and slows down the Planning system further which still hasn't recovered to the standard assessment period of 8 weeks we enjoyed pre-covid.</p> <p>4. The policy takes no account of true commercial viability. Holding costs of land at present is unsustainable with interest rates at a 15 year high, and so on a £1 million property (which is pretty standard in Wandsworth) applicants are easily</p>	

Rep No.	Respondent Name	Comments	Officer's Response
		<p>paying £12K per month in interest while waiting for a planning decision, if this increases from an average of 12 weeks to a possible of 70 weeks this alone will make development in the borough unsustainable.</p> <p>5. In addition to holding costs, the cost of achieving planning permission has risen sharply recently due to stricter sustainability and biodiversity policies, and increased planning application fees. All developments now need to include green/brown roofs, air/ground source heat pumps, photovoltaics, enhanced building insulation and the associated costs of installing all these measures has pushed up building costs considerably on top of the increased material/labour costs since Brexit/Covid.</p> <p>6. If it becomes too expensive for applicants to develop in Wandsworth sites will not come forward and the lack of regeneration will degrade the street scene and in five years' time Wandsworth will look a very different borough from today with many rundown/derelict buildings/sites blighting the borough because they are not financially viable to bring forward.</p> <p>7. In addition, if applicants stop building properties in Wandsworth as it's no longer sustainable/viable there will be less housing supplied. Not only will this forcing up rental/purchase prices, it will reduce the amount of affordable housing that comes forward and which is provided – the exact opposite of what this policy is trying to achieve.</p> <p>8. Strongly disagree</p> <p>9. These comments are made in respect of all consultation documents: 1. This policy is directly contrary to government advice set out in the NPPF and conflicts with it. 2. Implementing Affordable Housing will substantially delay the decision period due to the negotiation over viability and the time take to agree any s.106 agreement. Currently decisions take 8-12 weeks but experience shows that this could increase to 70 weeks. The Local Plan Inspector who forced Lambeth to drop their Affordable Housing contributions under a 10 unit threshold proposed in their Sept 2021 Local Plan stated that taking a sample of 60 schemes for minor</p>	

Rep No.	Respondent Name	Comments	Officer's Response
		<p>developments the decision period took an average of 71 weeks due to the negotiation process associated with Affordable Housing Contributions.</p> <p>3. Experience shown that this policy only clogs up and slows down the Planning system further which still hasn't recovered to the standard assessment period of 8 weeks we enjoyed pre-covid.</p> <p>4. The policy takes no account of true commercial viability. Holding costs of land at present is unsustainable with interest rates at a 15 year high, and so on a £1 million property (which is pretty standard in Wandsworth) applicants are easily paying £12K per month in interest while waiting for a planning decision, if this increases from an average of 12 weeks to a possible of 70 weeks this alone will make development in the borough unsustainable.</p> <p>5. In addition to holding costs, the cost of achieving planning permission has risen sharply recently due to stricter sustainability and biodiversity policies, and increased planning application fees. All developments now need to include green/brown roofs, air/ground source heat pumps, photovoltaics, enhanced building insulation and the associated costs of installing all these measures has pushed up building costs considerably on top of the increased material/labour costs since Brexit/Covid.</p> <p>6. If it becomes too expensive for applicants to develop in Wandsworth sites will not come forward and the lack of regeneration will degrade the street scene and in five years' time Wandsworth will look a very different borough from today with many rundown/derelict buildings/sites blighting the borough because they are not financially viable to bring forward.</p> <p>7. In addition, if applicants stop building properties in Wandsworth as it's no longer sustainable/viable there will be less housing supplied. Not only will this forcing up rental/purchase prices, it will reduce the amount of affordable housing that comes forward and which is provided – the exact opposite of what this policy is trying to achieve.</p>	
054	Michael Doyle	<p>4. Strongly disagree</p> <p>5. 50% IS TOO MUCH.</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>6. Disagree</p> <p>7. This is too much.</p> <p>8. Strongly disagree</p> <p>9. It will make development unsustainable.</p>	<p>testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p>
055	Marcus Dreike	<p>4. Strongly disagree</p> <p>5. 50% affordable homes for all new developments is completely unrealistic for many small sites where developers are working on small margins, it will simply make most smaller sites unviable and therefore they wont be developed and fewer homes will be built. Totally counterintuitive.</p> <p>6. Disagree</p> <p>7. 70/30 is too much, yes we need more affordable homes but that split is too much, nothing will be built as developers will find it too hard to justify financially.</p> <p>8. Strongly disagree</p> <p>9. The major problem we face currently with trying to achieve new house targets is the ti eit takes to get planning permission, this policy will only lengthen the process with extra legal work, reports and consultations, Southwark and Lambeth are experiencing these issues. Planning is taking an age (our current project has taken over 6 months to get to committee. Developers want to build good quality properties on small sites, they contribute to the overall target for housing need but it is becoming increasingly difficult because of the time it takes to go through the planning this policy will most likely be the nail in the coffin for small developers operating in Wandsworth. They will simply go elsewhere as it it will be financially unjustifiable to develop small sites in Wandsworth Supply will diminish, demand will increase, prices will go up, rental too. Please stop making it harder to build</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		homes, developers and councils need to work together to address the homes shortage and we want to help but it is becoming very difficult to make even a decent living developing small sites , finance is expensive, timeframes are long and red tape is getting worse, please don't add more to the process.	
056	Brian Drewery, Drewery Property Ltd	4. Strongly disagree 5. 1 -1 affordable housing 6. Strongly disagree 7. too much 8. Strongly disagree 9. will make this size of development unviable, so will halt any regeneration in the area	Comments noted. The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.
057	Guy Duder, Porthminster Ltd	4. Strongly disagree 5. Simply not a viable solution 6. Strongly disagree 7. Simply not a viable solution 8. Strongly disagree 9. Simply not a viable solution	Comments noted. The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.
058	Charlie Edwards, Bells Chartered Surveyors	4. Strongly disagree 6. Neither agree nor disagree 8. Strongly disagree	Comments noted. The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence

Rep No.	Respondent Name	Comments	Officer's Response
		<p>10. I believe the proposed policy change on affordable housing will have a negative effect on housing provision by making development unviable. It will reduce the number of properties and drive up prices/rents for residents in the borough</p>	<p>collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>
059	Tom Elder, Caerus Developments	<p>4. Strongly disagree</p> <p>5. 50 per cent of dwellings as affordable homes delivered on site</p> <p>6. Neither agree nor disagree</p> <p>7. As long as this split is ratified by SHMAA and viability evidence.</p> <p>8. Strongly disagree</p> <p>9. To require affordable housing from small sites below the current threshold of 10 or more homes (gross)</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p>
060	Steven Fidgett, Caddick Group	<p>Do you support our objective to strengthen the Local Plan policy requirement for new housing developments in the borough to provide at least 50 per cent of dwellings as affordable homes delivered on the site?</p> <p>We are supportive of the need to provide affordable housing to meet the Borough's needs, and support the recent introduction of policy LP23 that seeks to maximise the delivery of affordable housing in accordance with the London Plan Threshold Approach. This aims to contribute to securing the Mayor's strategic target of 50 per cent of all new homes to be affordable.</p>	<p>Comments noted.</p> <p>The WBC Transport Committee considered a paper on 21st September 2021 which detailed the reasoning behind the Council's decision to progress to Regulation 18 on the partial review of the Local Plan. Minutes from the WBC Transport Committee meeting on</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>However, we would caution against amending this policy through the proposed partial review so soon after its adoption as part of the Local Plan in June 2023, just a few months ago. It is also unclear what detailed changes are proposed to strengthen the policy and to what degree these would comply with strategic and national policy or the commitments made in the recent Local Plan review? It is therefore, not possible to comment on the detail at this stage other than in general terms.</p> <p>Affordable housing should be provided as part of balanced provision for housing that is consistent with the evidence in the recently adopted Local Plan and the strategic policy of the London Plan and NPPF. There also needs to be consistency between the provision of affordable housing of different tenures (eg First Homes) as expected by the NPPF and the London Plan.</p> <p>The Wandsworth Local Plan Examination considered these issues and the conclusions are set out in the Examination Report. For investment decisions to be made which can deliver affordable and other homes on a reasonable basis, a degree of consistency and stability is essential.</p> <p>The Regulation 18 assessment is not clear as to what the proposed policy wording would be in any review and how this might differ from the existing policy criteria or those of the London Plan. Hence, while the London Plan policy H5 has an overall target of achieving 50% affordable homes as a proportion of overall housing proposed and delivered, it adopts a structured approach that provides for the fast track route for applications that meet the minimum 35% affordable housing provision on a policy compliant tenure mix. This should be maintained. The policy also requires 50% provision on public sector land and in other specified cases.</p> <p>The policy (and Policy LP23) importantly also provides for viability testing where proposals do not meet these levels. This viability testing in such cases should be</p>	<p>Thursday 21st September can be viewed publicly here.</p> <p>The Council will consider the policy's relationship with the London Plan and the NPPF. The Council will be working with the GLA and other bodies to ensure that the policy is in conformity with other planning documents and guidelines and is justifiable and evidenced.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p data-bbox="382 271 1459 483">maintained. This is an important part of the development process and allows the policy to be applied fairly and reasonably to situations where market values, remediation and construction costs and existing use values differ between sites and over time. In order to be able to deliver the optimum level of new housing, including affordable homes, development first needs to be viable. Without this, projects risk stagnating and permissions being stalled.</p> <p data-bbox="382 524 1459 878">While the proposals in the Regulation 18 consultation reference changing demographic data, it is not clear what the evidence base for the proposed changes to policy LP23 are, as these are not set out. It is important to understand the evidence base as well as the impact on development economics and the viability of the proposals set out elsewhere in the Local Plan, all of which will likely have been predicated on the values and assumptions of the original Local Plan and which were considered in the accompanying Examination. The impact on development viability across the Borough should be reassessed and set out to take account of any proposed changes and this will determine the wider impacts associated with the policy.</p> <p data-bbox="382 919 1459 1170">We believe that the combination of existing policy LP23 and London Plan policy H5 achieves this balance, reflects the evidence base and ensures that development has the potential to deliver a meaningful contribution to affordable housing in difficult market conditions as well as when times are good. While the provision of affordable homes is supported, it is not clear how changes could be made that are reasonable and balanced and which fairly reflect regional and national policy and we have concern therefore, over the proposed changes.</p> <p data-bbox="382 1211 1459 1421">While we note that the framework of the Sustainability Appraisal is not proposed to be amended to reflect the proposed policy changes, it is not clear whether the impact on development viability has been considered in the scoring given. If the effect is to reduce viability and hence impact adversely on the delivery of new homes, the impact of the changes would be negative in sustainability and housing outcomes, reducing access to new homes across each tenure.</p>	<p data-bbox="1472 271 2072 443">The Council will be reviewing the Sustainability Appraisal and other supporting documents for the Regulation 19 stage of the Plan, and the outcomes of this process will be reported at that time.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>Do you support our objective that a greater proportion of all new affordable homes to be genuinely affordable, preferably a 70/30 split in favour of social rent?</p> <p>While we would start our comments by restating our commitment to deliver affordable homes, as part of mixed use developments that meet a range of relevant Local Plan objectives, we are concerned that the proposed change in the tenure mix to a 70/30 split in favour of social rent, may adversely impact on the viability of development being brought forward and a more flexible approach based on the existing policy may in fact deliver more affordable homes than the proposed new policy approach.</p> <p>This depends on the detailed formulation of the first part of the policy (as noted above) and whether this allows for the fast track route at 35% affordable homes and viability testing and whether the new targets are with or in the absence of grant.</p> <p>We would repeat our comments made in respect of question 5, in that the evidence base and viability appraisal for the Local Plan as a whole would need to be reassessed and set out to accompany any proposed change in tenure mix, given the potential impact on development viability and hence the delivery assumptions and trajectory of the Local Plan.</p>	
061	Simon Ellis, Jem	<p>4. Strongly disagree</p> <p>5. Delay in Decision Period: Implementing such a policy could significantly extend the decision-making period due to legal negotiations. The example of Southwark Council indicates a risk of prolonged delays, which could be detrimental to project timelines and overall efficiency. Planning System Congestion: An already burdened planning system might face further clogging, exacerbating the delay in approvals. This could hinder the overall development process across the borough. Financial Viability - Holding Costs: With high interest rates, the extended waiting</p>	<p>Comment noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>period for planning decisions could escalate holding costs dramatically, impacting the financial viability of projects. Rising Planning Permission Costs: Increased costs due to sustainability and biodiversity requirements, alongside general inflation in material and labor costs, add to the financial burden on developers.</p> <p>Impact on Local Regeneration: If the costs and delays discourage development, this could lead to stagnation in urban regeneration, leaving derelict sites undeveloped. This would negatively impact the local environment and economy.</p> <p>Market Dynamics - Supply and Demand: A reduction in development could lead to a decrease in supply, potentially driving up rental and purchase prices, which might be contrary to the policy's intent of making housing more affordable.</p> <p>Balancing these concerns with the need for affordable housing is challenging. While the objective of increasing affordable housing is commendable and addresses a crucial social need, the implementation as proposed could have unintended negative consequences on the housing market and development sector in Wandsworth. It's important to find a middle ground that encourages affordable housing development while also considering the economic and practical realities faced by developers.</p> <p>Conclusion: While the goal of increasing affordable housing is essential, the approach needs to be carefully calibrated to avoid counterproductive outcomes. A more nuanced policy that considers the realities of development economics, possibly with incentives or phased implementation, might be more effective in achieving the desired balance between development viability and social housing needs.</p> <p>6. Strongly disagree</p> <p>7. Delay in Decision Period: Implementing such a policy could significantly extend the decision-making period due to legal negotiations. The example of Southwark Council indicates a risk of prolonged delays, which could be detrimental to project timelines and overall efficiency.</p> <p>Planning System Congestion: An already burdened planning system might face further clogging, exacerbating the delay in approvals. This could hinder the overall development process across the borough.</p> <p>Financial Viability - Holding Costs: With high interest rates, the extended waiting</p>	<p>on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>period for planning decisions could escalate holding costs dramatically, impacting the financial viability of projects. Rising Planning Permission Costs: Increased costs due to sustainability and biodiversity requirements, alongside general inflation in material and labor costs, add to the financial burden on developers.</p> <p>Impact on Local Regeneration: If the costs and delays discourage development, this could lead to stagnation in urban regeneration, leaving derelict sites undeveloped. This would negatively impact the local environment and economy.</p> <p>Market Dynamics - Supply and Demand: A reduction in development could lead to a decrease in supply, potentially driving up rental and purchase prices, which might be contrary to the policy's intent of making housing more affordable.</p> <p>Balancing these concerns with the need for affordable housing is challenging. While the objective of increasing affordable housing is commendable and addresses a crucial social need, the implementation as proposed could have unintended negative consequences on the housing market and development sector in Wandsworth. It's important to find a middle ground that encourages affordable housing development while also considering the economic and practical realities faced by developers.</p> <p>Conclusion: While the goal of increasing affordable housing is essential, the approach needs to be carefully calibrated to avoid counterproductive outcomes. A more nuanced policy that considers the realities of development economics, possibly with incentives or phased implementation, might be more effective in achieving the desired balance between development viability and social housing needs.</p> <p>8. Strongly disagree</p> <p>9. Delay in Decision Period: Implementing such a policy could significantly extend the decision-making period due to legal negotiations. The example of Southwark Council indicates a risk of prolonged delays, which could be detrimental to project timelines and overall efficiency. Planning System Congestion: An already burdened planning system might face further clogging, exacerbating the delay in approvals. This could hinder the overall development process across the borough.</p> <p>Financial Viability - Holding Costs: With high interest rates, the extended waiting</p>	

Rep No.	Respondent Name	Comments	Officer's Response
		<p>period for planning decisions could escalate holding costs dramatically, impacting the financial viability of projects. Rising Planning Permission Costs: Increased costs due to sustainability and biodiversity requirements, alongside general inflation in material and labor costs, add to the financial burden on developers.</p> <p>Impact on Local Regeneration: If the costs and delays discourage development, this could lead to stagnation in urban regeneration, leaving derelict sites undeveloped. This would negatively impact the local environment and economy.</p> <p>Market Dynamics - Supply and Demand: A reduction in development could lead to a decrease in supply, potentially driving up rental and purchase prices, which might be contrary to the policy's intent of making housing more affordable.</p> <p>Balancing these concerns with the need for affordable housing is challenging. While the objective of increasing affordable housing is commendable and addresses a crucial social need, the implementation as proposed could have unintended negative consequences on the housing market and development sector in Wandsworth. It's important to find a middle ground that encourages affordable housing development while also considering the economic and practical realities faced by developers.</p> <p>Conclusion: While the goal of increasing affordable housing is essential, the approach needs to be carefully calibrated to avoid counterproductive outcomes. A more nuanced policy that considers the realities of development economics, possibly with incentives or phased implementation, might be more effective in achieving the desired balance between development viability and social housing needs.</p> <p>10. Delay in Decision Period: Implementing such a policy could significantly extend the decision-making period due to legal negotiations. The example of Southwark Council indicates a risk of prolonged delays, which could be detrimental to project timelines and overall efficiency.</p> <p>Planning System Congestion: An already burdened planning system might face further clogging, exacerbating the delay in approvals. This could hinder the overall development process across the borough.</p>	

Rep No.	Respondent Name	Comments	Officer's Response
		<p>Financial Viability - Holding Costs: With high interest rates, the extended waiting period for planning decisions could escalate holding costs dramatically, impacting the financial viability of projects.</p> <p>Rising Planning Permission Costs: Increased costs due to sustainability and biodiversity requirements, alongside general inflation in material and labor costs, add to the financial burden on developers.</p> <p>Impact on Local Regeneration: If the costs and delays discourage development, this could lead to stagnation in urban regeneration, leaving derelict sites undeveloped. This would negatively impact the local environment and economy.</p> <p>Market Dynamics - Supply and Demand: A reduction in development could lead to a decrease in supply, potentially driving up rental and purchase prices, which might be contrary to the policy's intent of making housing more affordable.</p> <p>Balancing these concerns with the need for affordable housing is challenging. While the objective of increasing affordable housing is commendable and addresses a crucial social need, the implementation as proposed could have unintended negative consequences on the housing market and development sector in Wandsworth. It's important to find a middle ground that encourages affordable housing development while also considering the economic and practical realities faced by developers.</p> <p>Conclusion: While the goal of increasing affordable housing is essential, the approach needs to be carefully calibrated to avoid counterproductive outcomes. A more nuanced policy that considers the realities of development economics, possibly with incentives or phased implementation, might be more effective in achieving the desired balance between development viability and social housing needs.</p>	
062	Chris Ellis, Nutbrook	4. Strongly disagree	Comment noted.

Rep No.	Respondent Name	Comments	Officer's Response
	Development Group	<p>6. Strongly disagree</p> <p>8. Strongly disagree</p> <p>10.</p> <p>1. Delays in Decision-Making: Introducing Affordable Housing negotiations could extend planning decision times from 8-12 weeks to potentially 70 weeks, impacting project timelines.</p> <p>2. Planning System Overload: This delay risks further congesting an already backlogged planning system, slowing down the development process.</p> <p>3. Increased Financial Burden: Higher interest rates significantly elevate the cost of holding land during extended planning periods, challenging the financial feasibility of projects.</p> <p>4. Rising Development Costs: New sustainability and biodiversity policies have led to higher construction costs, adding financial pressure on developers.</p> <p>5. Potential Impact on Regeneration: Prolonged delays and increased costs might deter development in Wandsworth, affecting the borough's regeneration and possibly leading to higher property prices.</p> <p>In short, increased constraints on developers will lead to negative consequences in terms of new homes brought to market by SME developers. Increasing the cost of doing business, will result in fewer homes being built, thus defeating the objective of the council to increase the number of affordable homes.</p> <p>Resources may be better spent increase the planning approval process, thus allowing more homes to be built sooner, increasing the supply and hopefully establishing a more competitive market for buyers, trending towards giving the buyers more power over the sellers/developers</p>	<p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>

Rep No.	Respondent Name	Comments	Officer's Response
063	Mark Eynon, MJE Properties Ltd	<p>4. Strongly disagree</p> <p>5. I have had to apply for planning in Southwark where strict new affordable housing rules have been introduced. Our planning was successful but took 11 month to finalise due to negotiations over affordable (which were to completely unviable). In the end the council fudged their figures, no affordable payment was requested, but the project had accrued so much interest during negotiations that we had to walk away and never developed the site. A total waste of time. We even offered to pay £10k (instead of the £55k requested but never claimed) to settle. In the end the council settled for £0, but by then it was too late and the council got no affordabel homes, no payment and the new dwellings were never built. I will never build new dwellings in that borough again and I now build new homes elsewhere.</p> <p>6. Strongly disagree</p> <p>7. Council members have no idea of the risks and costs incurred by developers. These are usually personally backed schemes. If they fail the smaller developers can go personally bankrupt yet the councils treat the developers like piggy banks. This is very far from reality. Perhaps councillors should spend some time in developers' offices to learn what it is really like and how difficult it is. Why are councils, with public funding, and no personal financial risk, not building affordable housing. I would be happy to come in and discuss.</p> <p>8. Strongly disagree</p> <p>9. Small sites have very tight margins even if 100% private. Margins have narrowed hugely in the last 24 months. Adding yet another burden on small developers is mad. It will clear the sector of the small firms, removing the future challengers to the big firms, leaving you, the council, at the mercy of Persimmon etc. It is appalling long term thinking.</p>	<p>Comment noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>10. Yes - use public money to build affordable housing. Take a look at any graph of house building and the missing element from 1970's vs today is the govt backed new builds. Why punish the private sector which is the only sector still trying to build new homes? Stop demonising a very hard working, risky and tough industry. We take massive personal risks to do this and councils simply take pot shots and set up unworkable viability schemes, making developers pay all the costs. This will simply exacerbate UK's housing supply problem. Conservative ruin housing supply through planning and Labour ruin it through taxation. Stop fiddling and just leave the sector alone.</p>	
064	Thomas Fairley	<p>4. Strongly disagree</p> <p>5. 50% is too high and forces out any small business or personal development</p> <p>6. Disagree</p> <p>7. These percentages are still too high</p> <p>8. Strongly disagree</p> <p>9. if developers stop building properties in Wandsworth as it's no longer sustainable/viable there will be less supply, therefore forcing up rental/purchase prices – the exact opposite of what this policy implementation is trying to achieve.</p> <p>10. This policy will only clog up the Planning system further and deter future high quality development in the borough, meaning only large developers prosper.</p>	<p>Comment noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>
065	I C Faithfull, Faithfull Architects	<p>4. Strongly disagree</p> <p>5. In consideration of regulation 18. For smaller sites, 50% AH on site is very rarely viable, instigating many months of planning negotiations and delays. We have found after many feasibility studies that the costs of CIL and AH contributions have made schemes unviable and clients have not proceeded. So to increase the requirements to be 50% onsite will make all even less deliverable.</p>	<p>Comment noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>Obviously, on larger sites, such viability criteria are different and easily administered AH blocks can be created. Therefore, whilst for some large scale developments 50%AH might be viable, due to the nature of smaller developments in Wandsworth, this proposal would make even less housing financially viable, thus delivering even less affordable housing. Reducing AH requirements (not eliminating) on Developers would allow more schemes to be viable, thus allowing more to be delivered and hence providing more overall housing and more AH units. Hence, whilst the ratio of market to affordable maybe lower, the actual number of affordable units provided would be higher.</p> <p>6. Strongly disagree</p> <p>7. For smaller developments, we have found social landlords have declined to consider small site with only a few AH social rented units because their administration costs are too high per unit, fragmenting resources makes such few AH units in small developments undesirable. So, in the case of smaller site, increasing the split to be 70/30, would make the development even less deliverable. Also, from our experience working in Wandsworth for over 30 years, small sites are usually pretty marginal financially, so to reduce their viability by increasing the AH burden will merely reduce deliverable schemes and cause demand to further outstrip supply, making housing in Wandsworth even less affordable.</p> <p>8. Strongly disagree</p> <p>9. Similarly to Q8, from our experience working in Wandsworth for over 30 years, small sites are usually pretty marginal financially, so to reduce their viability by increasing the AH burden, together with all the other increased costs, will merely reduce deliverable schemes and cause demand to further outstrip supply, making housing in Wandsworth even less affordable. Housing Developing is a risky business to the Developer, even more so now with increasing interest rates, construction and inflationary procurement costs. Thus, increasing the AH burden</p>	<p>policy is justified and viable. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p> <p>For smaller sites of 9 homes or fewer, the Council anticipates that it would seek cash contributions rather than on-site affordable housing units (and subject to viability assessment where necessary) – this approach would mean that adoption of small numbers of affordable units by Registered Providers would not be an issue for developers.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>will reduce the viability and, like a tax, when raised to a level where the viability risk is no longer sustainable and prevents delivery, there will be less supply, therefore forcing up rental/purchase prices – the exact opposite of what this policy is trying to achieve.</p> <p>10. Current policy for the provision of Affordable Housing is a financial burden on the Developer, and has similar characteristics to taxation, which if too high, deters investment and results in accountants devising avoidance strategies. If policies allowed financial assistance for the provision of Affordable Housing, then like tax-breaks, the result would be greater provision of genuine affording homes.</p>	
066	Dr Antonio Fidalgo	<p>4. Strongly agree.</p> <p>5. at the moment there housing stock is not even affordable for Londoners in the top 10% of earners (£79,524)</p> <p>6. Agree.</p> <p>7. again, for young families the average rent makes it very hard to raise a family in London.</p> <p>8. Strongly agree.</p> <p>9. all developments should allow for affordable housing.</p> <p>10. I would also support the council releasing plots for self builders so that they can continue to live in the borough.</p>	<p>Support noted.</p> <p>The Council will be producing an updated Housing Needs Assessment which will provide an up-to-date picture of the scale of demand for self- and custom-build housing, which will enable informed decisions to be made on this issue as part of future plan reviews.</p>
067	Antonio Fidalgo	<p>4. Strongly agree</p> <p>5. We need affordable houses for local people</p> <p>6. Strongly agree</p>	<p>Support noted.</p> <p>The Council will be seeking to update the January 2022 Porter Planning Economics report alongside an update of the Local Housing Needs Assessment, which will</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>7. At the moment even shared ownership is not affordable for someone on an average London salary</p> <p>8. Strongly agree</p> <p>9. Every opportunity counts so make sure it is like that.</p> <p>10. Estate agents emails me to vote against. Please be aware they are lobbying to defeat this proposal and ensure landlords continue profiteering from schemes aimed at supporting the locals.</p>	<p>consider changes in the economy, and in housing need, in the intervening period.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures including shared ownership.</p>
068	Steve Fidgett, Union 4 Planning obo Caddick Group	<p>4. Disagree</p> <p>5. We are supportive of the need to provide affordable housing to meet the Borough's needs, and support the recent introduction of policy LP23 that seeks to maximise the delivery of affordable housing in accordance with the London Plan Threshold Approach. This aims to contribute to securing the Mayor's strategic target of 50 per cent of all new homes to be affordable.</p> <p>However, we would caution against amending this policy through the proposed partial review so soon after its adoption as part of the Local Plan in June 2023, just a few months ago. It is also unclear what detailed changes are proposed to strengthen the policy and to what degree these would comply with strategic and national policy or the commitments made in the recent Local Plan review? It is therefore, not possible to comment on the detail at this stage other than in general terms.</p> <p>Affordable housing should be provided as part of balanced provision for housing that is consistent with the evidence in the recently adopted Local Plan and the strategic policy of the London Plan and NPPF. There also needs to be</p>	<p>Comments noted.</p> <p>The Council will consider the policy's relationship with the London Plan, the NPPF and other Local Plan Policies. The Council will be working with the GLA and other bodies to ensure that the policy is in conformity with other planning documents and guidelines and is justifiable and evidenced.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>consistency between the provision of affordable housing of different tenures (eg First Homes) as expected by the NPPF and the London Plan.</p> <p>The Wandsworth Local Plan Examination considered these issues and the conclusions are set out in the Examination Report. For investment decisions to be made which can deliver affordable and other homes on a reasonable basis, a degree of consistency and stability is essential.</p> <p>The Regulation 18 assessment is not clear as to what the proposed policy wording would be in any review and how this might differ from the existing policy criteria or those of the London Plan. Hence, while the London Plan policy H5 has an overall target of achieving 50% affordable homes as a proportion of overall housing proposed and delivered, it adopts a structured approach that provides for the fast track route for applications that meet the minimum 35% affordable housing provision on a policy compliant tenure mix. This should be maintained. The policy also requires 50% provision on public sector land and in other specified cases.</p> <p>The policy (and Policy LP23) importantly also provides for viability testing where proposals do not meet these levels. This viability testing in such cases should be maintained. This is an important part of the development process and allows the policy to be applied fairly and reasonably to situations where market values, remediation and construction costs and existing use values differ between sites and over time. In order to be able to deliver the optimum level of new housing, including affordable homes, development first needs to be viable. Without this, projects risk stagnating and permissions being stalled.</p> <p>While the proposals in the Regulation 18 consultation reference changing demographic data, it is not clear what the evidence base for the proposed changes to policy LP23 are, as these are not set out. It is important to understand the evidence base as well as the impact on development economics and the viability of the proposals set out elsewhere in the Local Plan, all of which will likely</p>	<p>planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The policy formulation process will account for implications on existing permissions, amendments to existing permissions and long-term schemes. A range of scenarios will be tested for viability as part of the policy formulation process.</p> <p>Once adopted, the revised policy will apply to all new planning applications including large-scale long-term developments. In the period ahead of adoption, proposals will be considered on a case-by-case basis in light of the evidence available at that time.</p> <p>The Council will be reviewing the Sustainability Appraisal and other supporting documents for the Regulation 19 stage of the Plan, and the outcomes of this process will be reported at that time.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>have been predicated on the values and assumptions of the original Local Plan and which were considered in the accompanying Examination. The impact on development viability across the Borough should be reassessed and set out to take account of any proposed changes and this will determine the wider impacts associated with the policy.</p> <p>We believe that the combination of existing policy LP23 and London Plan policy H5 achieves this balance, reflects the evidence base and ensures that development has the potential to deliver a meaningful contribution to affordable housing in difficult market conditions as well as when times are good. While the provision of affordable homes is supported, it is not clear how changes could be made that are reasonable and balanced and which fairly reflect regional and national policy and we have concern therefore, over the proposed changes.</p> <p>While we note that the framework of the Sustainability Appraisal is not proposed to be amended to reflect the proposed policy changes, it is not clear whether the impact on development viability has been considered in the scoring given. If the effect is to reduce viability and hence impact adversely on the delivery of new homes, the impact of the changes would be negative in sustainability and housing outcomes, reducing access to new homes across each tenure.</p> <p>6. Disagree</p> <p>7. While we would start our comments by restating our commitment to deliver affordable homes, as part of mixed use developments that meet a range of relevant Local Plan objectives, we are concerned that the proposed change in the tenure mix to a 70/30 split in favour of social rent, may adversely impact on the viability of development being brought forward and a more flexible approach based on the existing policy may in fact deliver more affordable homes than the proposed new policy approach.</p>	

Rep No.	Respondent Name	Comments	Officer's Response
		<p>This depends on the detailed formulation of the first part of the policy (as noted above) and whether this allows for the fast track route at 35% affordable homes and viability testing and whether the new targets are with or in the absence of grant.</p> <p>We would repeat our comments made in respect of question 5, in that the evidence base and viability appraisal for the Local Plan as a whole would need to be reassessed and set out to accompany any proposed change in tenure mix, given the potential impact on development viability and hence the delivery assumptions and trajectory of the Local Plan.</p> <p>8. Neither agree or disagree</p> <p>9. No comment</p>	
069	Sarah-Jane Field, Convent Co-operative Housing	<p>4. Strongly agree.</p> <p>5. Equality Impact and Needs Analysis - I thoroughly agree that you should be addressing disparity under the headings of race/ethnicity but am disappointed to see these plans will have no impact for single mothers. Having ten years trying and failing to access so-called affordable housing, it is infuriating single parents continue to be ignored.</p> <p>6. Agree.</p> <p>7. Equality Impact and Needs Analysis - the current schemes except banks and builders rather than residents. Some of these packages contain all the worst aspects of owning with few of the benefits and all the worst aspects of renting with none of the benefits. Build some actual council homes. As a single parent renting privately, I cannot even access subsidised rent, never mind house purchase grants, or share ownership. All of these schemes are currently completely out of reach.</p>	<p>Support noted.</p> <p>The Council will be seeking to update the January 2022 Porter Planning Economics report alongside an update of the Local Housing Needs Assessment, which will consider changes in the economy, and in housing need, in the intervening period.</p> <p>Alongside considering the broad demographic housing needs of the borough, the Local Housing Needs Assessment does consider the needs of different types of household. The Council will also update the Equality Impact Needs Assessment as part of the Regulation 19 consultation.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>8. Neither agree or disagree.</p> <p>10. I have been living in a private rented property for nearly ten years. The house is in desperate need of decorating. However, I feel lucky because for the moment, the rent, which was average at the start, is now below market rate. Even so, it is still more than I can afford and the rent is about to increase. If I were to move within the area, I would have to pay more for less space. If I moved out of the area, I'd be no better off, as I would have to pay travel and probably higher CT (plus deal with the loss of community/family nearby). In 2013, I was offered a shared ownership property but could not get a mortgage. Now, after having to live off savings as things became increasingly expensive, I get laughed at when inquiring about the possibility of shared ownership. I don't earn enough for subsidised rents as these are mostly constructed with young couples in mind with two incomes. As time passes, the hope of a secure home moves further and further away. There is literally no solution for me and others like me and the threat of homelessness is ever present, despite the fact, I have two jobs. What's worse is that people working in housing don't seem to know their own rules. I have been sent on wild goose chases by people in the WBC sales team, only to be told I would need to be nominated for lower rent properties. I can't be nominated because I can't even get on the actual housing list. I am registered for these housing schemes but cannot access any of them. It's a farce. You HAVE to stop ignoring single mothers. You have to build more real council homes to meet the very desperate need. Neoliberal vehicles are the the answer. Imagine how different things might be for me if I had been paying all this money for the last ten years into a property that was partially or all mine. And as I have received housing benefit for some of these years, WBC is basically supporting private landlords. Had I been in a council property, WBC would have been investing in its own capital instead. The whole system is defunct as it is.</p>	<p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures including private rent, social rent and shared ownership.</p>
070	James Fownes	<p>4. Strongly disagree</p> <p>5. I understand the good intention however this is an example of poor implementation of policy without thinking of the wider impact. This will essentially</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>make small scale residential development unviable economically leading to the delivery of less homes in a market that is already ow supply high demand</p> <p>6. Neither agree nor disagree</p> <p>8. Strongly disagree</p> <p>9. I understand the good intention however this is an example of poor implementation of policy without thinking of the wider impact. This will essentially make small scale residential development unviable economically leading to the delivery of less homes in a market that is already ow supply high demand</p>	<p>testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>
071	Peter Friend, HNF Property	<p>I write to object to the intended revision of affordable housing ratios revealed in the draft local plan.</p> <p>As a surveyor actively involved in development in the borough and surrounding boroughs, I am well aware of the impact of excessively high affordable requirements on developments. We have seen countless schemes stalled, particularly on smaller schemes of under 20 units. We act for Housing associations who advise us that they have little interest in taking on a handful of units within a wider scheme and therefore units designated as affordable are</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>considered unviable and therefore makes the entire project not worth pursuing. Ultimately, 50% of nothing is nothing. Far better to seek contributions in lieu which would allow redundant stock to be renovated as affordable or new schemes built as 100% affordable.</p> <p>Like much planning policy, the intentions are good, but the practical reality often creates the opposite of what was intended.</p> <p>Once a change is made, it takes an age to reverse and the intended policy will stifle development in the borough in my view.</p>	<p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p>
072	Daniel Gabbay	<p>4. Strongly disagree</p> <p>5. 50 per cent is too excessive</p> <p>6. Disagree</p> <p>7. Too excessive - an effort to address the problem should be driven by the market and if that is not deemed to be working sufficiently then those failures should be addressed, namely increased incentives for developers to invest in the borough and quicken & improve communication for the planning process to increase supply. This is something developers are very willing to pay for</p> <p>8. Strongly disagree</p> <p>9. We appreciate the need for affordable housing but implementing this policy is too large an adjustment for smaller developers to adapt to. In order to make such proposals more viable and collaborative it would help if something was simultaneously proposed that helped offset the policy to make it more financially</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>justifiable. For instance, the process of dealing with applications and removal of conditions are taking too long to process and are too inconsistent and unpredictable, and are frustrated by a lack of communication and collaboration. A recent experience was that a project took 30 weeks to go before the Committee. An interest charge of c.£15k per month was accruing on a site that cost just over £1m. We would much rather a larger portion of those funds are invested in the council and into sustainability rather than it being passed to the banks and investors, it's a significant misallocation of resources. Preparing and negotiating on viability appraisals relating to Affordable Housing will further delay the planning process. It is my understanding that Lambeth proposed AH contributions for under 10 units relating to their 2021 Local Plan, but were forced to drop the policy after the Planning Inspector sampled 60 schemes and found it led to the average period of 71 weeks to reach a decision on minor schemes. I've been informed that Southwark Council currently have over 100 small site schemes undecided as they await their AH contributions resolved. The knock-on effect to vendors of small sites will be that houses suitable for development either as a conversion or a new build will become financially unviable and so developers will not acquire those sites – where that site was a (large) house they will therefore remain as a single dwelling and no additional supply will be added. For suitable land and commercial sites – the value of them will be driven down so that very few land owners will sell further reducing supply. On occasions that they do sell, plans will likely be submitted for more exclusive larger dwellings, again exacerbating the lack of supply. Many thanks for your time</p>	<p>to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>
073	Alan Ganesh	<p>4. Strongly disagree</p> <p>5. At least 50% per cent would make schemes unviable</p> <p>6. Disagree</p> <p>7. This proportion would still make schemes unviable.</p> <p>8. Strongly disagree</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>9. This policy would lengthen decision times which are already not being adhered to and would provide less incentive for developers to build at all in the area.</p>	<p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>
074	Echedey García Méndez	<p>4. Agree</p> <p>6. Agree</p> <p>8. Agree</p>	<p>Support noted.</p>
075	Shirin Georgani	<p>4. Strongly agree</p> <p>5. Wandsworth risks becoming a Borough of extreme wealth and extreme poverty if it doesn't act quickly. It is already alienating its traditional residents and many of those who were born in the Borough who will not be able to afford a genuinely affordable home to buy or rent. Myself and my family are having to move out of the Borough we've lived and worked in for over 10 years due to unaffordable housing for those not in social housing.</p> <p>6. Strongly agree</p> <p>7. Buying a home is still so unachievable and unlikely for so many, we shouldn't stigmatise renting and we should provide opportunities for renting to be affordable and secure by providing better security in tenancies and having affordable rents for all levels of society not just those in high paying jobs or with family mkneh</p> <p>8. Strongly agree</p> <p>9. We can't just put people in high rises or developments with 100s of homes as this risks isolating those who don't feel like they "truly belong" in a development. We should ensure that even small sites especially those building homes not just</p>	<p>Support noted.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>flats provide equitable access to those who need it where a flat may not be suited to their needs.</p> <p>10. Please implement these changes as soon as possible . Time is running out for so many, and we can't wait 4-5 years for these improvements.</p>	
076	Stephen Gibbons	<p>4. Strongly agree</p> <p>5. There are far too many homeless and far too many who struggle with paying private rents.</p> <p>6. Strongly agree</p> <p>7. There are far too many homeless and far too many who struggle with paying private rents.</p> <p>8. Agree</p> <p>9. There are far too many homeless and far too many who struggle with paying private rents.</p> <p>10. No further comment</p>	Support noted.
077	Alex Goble	<p>4. Strongly disagree</p> <p>5. 50% too much</p> <p>6. Disagree</p> <p>7. again too much</p> <p>8. Strongly disagree</p> <p>9. It makes sites unviable</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p>

Rep No.	Respondent Name	Comments	Officer's Response
078	David Goldsworthy	<p>4. Strongly agree</p> <p>6. Strongly agree</p> <p>8. Strongly agree</p> <p>10. Having invested £500m into the Borough to deliver over 1,000 private for rent and Affordable housing, the revised policy will mean we will focus future investment elsewhere in the UK. We have no need to invest into Wandsworth and the proposed changes make the development of new homes in Wandsworth more complex and risky relative to elsewhere in London and elsewhere across the UK.</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p>
079	John David Grainger, Avis Appleton & Associates	<p>4. Strongly disagree</p> <p>5. Due to help running an Architectural practice this would seriously effect our future work load in a negative way. Simple maths; if developers stop building properties in Wandsworth as it's no longer sustainable/viable there will be less supply, therefore forcing up rental/purchase prices – the exact opposite of what this policy implementation is trying to achieve.</p> <p>6. Strongly disagree</p> <p>7. If it becomes too expensive for developers to develop in Wandsworth the derelict/run down sites dotted around the borough will not get developed and regenerated which will have a knock on effect on the surrounding street scene and in five years' time Wandsworth will look a very different borough from today with many rundown/derelict buildings/sites around the borough that are not financially viable to regenerate. The current construction costs are now through the roof and developers will not invest accordingly. This will effect our local business which has help numerous building to be regenerated and given a new life within the Wandsworth borough.</p> <p>8. Strongly disagree</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>9. 6. Simple maths; if developers stop building properties in Wandsworth as it's no longer sustainable/viable there will be less supply, therefore forcing up rental/purchase prices – the exact opposite of what this policy implementation is trying to achieve.</p>	<p>delay in the planning application process and accelerate the delivery of housing.</p>
080	Dr Mark Gretason	<p>4. Neither agree or disagree.</p> <p>5. Not sufficiently qualified</p> <p>6. Disagree.</p> <p>7. I feel this question is loaded</p> <p>8. Agree.</p> <p>9. If you must develop (a very great shame) then you may as well have some leaning towards those who could not otherwise afford to live locally./</p> <p>10. The borough is being spoiled eg around Smugglers' Way. Horrid towers, trees gone. No longer a nice place to live in.</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes.</p>
081	Chris Gwilliam, Earlswood Homes	<p>4. Strongly disagree</p> <p>5. The proposal to require small sites to provide affordable housing</p> <p>6. Neither agree nor disagree</p> <p>8. Strongly disagree</p> <p>9. Developers are already under huge pressures from high interest rates, a very difficult housing market with decreasing house prices and a longer, more complicated and costly planning process than ever before (eg new requirements for BNG, sustainability etc). The reality is that small sites will no longer be viable</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>to develop so smaller developers will move to another borough to build. The timing of this is terrible. Lots of developers are finding it very difficult to stay afloat at the moment, larger developers are closing regional divisions and smaller developers are going bust. The result of requiring small sites to provide affordable housing will mean fewer small sites being built as they will not be viable to build any more, so fewer new homes in Wandsworth, less CIL and less S106 money for the council..</p>	<p>collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>
082	<p>Ollie Hacon, Avis Appleton & Associates Ltd.</p>	<p>4. Strongly disagree</p> <p>5. Implementing Affordable Housing will substantially delay the decision period due to the negotiation period with legals, currently we enjoy decisions in 8-12 weeks but this could increase to 70 weeks.</p> <p>6. Strongly disagree</p> <p>7. Delays in implementation due to Legals, backlog to the planning system, sites stuck in limbo becoming financially unviable. This will make it too time-consuming and costly for sites to be redeveloped and the Borough will end up with less housing supply overall.</p> <p>8. Strongly disagree</p> <p>9. Small sites will cease to be redeveloped if this objective is implemented. They will not be financially viable and will never get off the ground. The Borough will miss out on small sites mixed housing provision.</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>10. This review of the Local Plan will significantly increase the decision period for all applications from 2 months to over a year. This will cause a further backlog within the Planning System which has not fully recovered from the impact of Covid. With high interest rates, the current holding costs of land is borderline unsustainable. If the planning decision period extends up to ten times longer, there is no way these schemes will be financially viable.</p> <p>The cost and requirements for achieving planning permission has increased sharply over recent years due to stricter sustainability policies, material costs, etc. This policy change will ensure that schemes are no longer financially viable.</p> <p>If it is prohibitively expensive and planning decisions take too long, developers will no longer build in the Borough. There will be less housing supply overall, therefore forcing up rental/purchase prices and this is the exact opposite of what this policy implementation is trying to achieve.</p>	<p>expectations of those engaging with the planning system.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>
083	Charles Hardwick	<p>4. Strongly disagree</p> <p>5. The current local plan is proportionate.</p> <p>6. Strongly disagree</p> <p>7. The current local plan is proportionate and reasonable.</p> <p>8. Strongly disagree</p> <p>9. The current local plan is reasonable and proportionate.</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes.</p>
084	Chloe Harrison	<p>4. Strongly agree</p> <p>5. As a renter who will be forced to leave the borough due to rising rents, I am saddened to leave. Living in Wandsworth has been a highlight of my life and served me with core memories, but as a single woman I have been able to find an affordable home for myself. Despite earning a good wage, rising rents infringe on</p>	<p>Support noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>the ability of even myself to afford a home, so I cannot bare thinking about how other must survive. I truly believe Wandsworth has not only the power to make this change, but also lead other local authorities in best practice when providing much needed affordable housing</p> <p>6. Strongly agree</p> <p>7. I absolutely agree that a high proportion of social rent be provided, however I urge people to look at the caps for what is considered affordable. As a single woman, I recently looked at New Acres as an option and I earn above the affordable threshold however, would I have rented the normal rates, I would have been left with 300 to survive the month. The threshold needs to be reviewed in line with earnings and inflation.</p> <p>8. Neither agree or disagree</p> <p>9. Working in social housing myself I am absolutely committed to delivering this mission. I would love to see more stories on those that thrive in living in the social rent homes and how this has impacted their lives and their contributions back to the community. We need to let people know how much of an impact and legacy this can leave.</p>	<p>Council will be seeking to ensure that the policy is justified and viable and will not have a negative impact on the provision of other tenures.</p>
085	Nouman Hashmi	<p>4. Strongly disagree</p> <p>5. 50% is too much. Current allocation is more than appropriate</p> <p>6. Disagree</p> <p>7. Please see above as in 6.</p> <p>8. Strongly disagree</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>10. Implementing Affordable Housing will substantially delay the decision period due to the negotiation period with legals, currently we enjoy decisions in 8-12 weeks but this could increase substantially.</p> <p>Simple maths; if developers stop building properties in Wandsworth as it's no longer sustainable/viable there will be less supply, therefore forcing up rental/purchase prices – the exact opposite of what this policy implementation is trying to achieve.</p>	<p>planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>
086	Alice Hawkins, Turley obo VSM (NCGM) Ltd	<p>Do you support our objective to strengthen the Local Plan policy requirement for new housing developments in the borough to provide at least 50 per cent of dwellings as affordable homes delivered on the site?</p> <p>As a developer operating at large scale and long-term within the borough, including residential delivery, VSM (NCGM) Ltd (hereafter referred to as "VSM"), understand the importance of, and support, the delivery of affordable homes.</p> <p>VSM are delivering major development in the borough across the long-term through the New Covent Garden Market hybrid permission in Nine Elms, and will thereby continue to deliver new homes including affordable homes in the borough over the next 10 years. As such, VSM has a long-term interest in the delivery of affordable homes within Wandsworth and ensuring that housing delivery of all tenures is provided to meet local need.</p> <p>However, it is noted that this proposed requirement for 50% minimum affordable is significantly in excess of the Threshold approach to applications set out in Policy H5 of the London Plan (2021) which sets a threshold minimum of 35% provision for an application to be considered under Fast Track. The currently adopted Wandsworth Local Plan (2023) follows this approach, as set out in the</p>	<p>Comments noted.</p> <p>The WBC Transport Committee considered a paper on 21st September 2021 which detailed the reasoning behind The Council's decision to progress to Regulation 18 on the partial review of the Local Plan. Minutes from the WBC Transport Committee meeting on Thursday 21st September can be viewed publicly here.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council will consider the policy's relationship with the threshold approach and</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>current Policy LP23, that whilst the strategic target is 50%, the threshold approach set out in Policy H5 should be adhered to. This is considered appropriate and in conformity with the London Plan, a legal requirement under Section 19 Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012, and therefore the current approach of Policy LP23 is supported. The economic climate is currently fragile, with housing delivery across London slowing the requirement to increase affordable housing from 35% to 50% could reduce the delivery of schemes and thus any affordable housing provision.</p> <p>Viability testing/ Evidence Base</p> <p>This current adopted version of Policy LP23 was tested by a Viability Study carried out in January 2022 on the then-Regulation 19 version of the policy. This tested the baseline scenario of a minimum 35% affordable and tenure split as per the adopted Policy LP23 (50% low-cost rent), and in this scenario found that some schemes would not be viable, and would particularly put at risk the delivery of some typologies of BtR schemes including where the ratio of units with other non-residential uses is low (see table 7.3). As such, the report states at paragraph 7.14 that “As such, there may need to be some flexibility in the Local Plan to allow for less burdensome policies, such as the overall affordable housing rate and/or type of tenure within such schemes”. Further sensitivity testing was also carried out on this baseline scenario of 35% affordable.</p> <p>The Viability Study (2022) did also consider changes to the affordable housing rate, and noting the London Plan strategic target of 50%, tested this as ‘Scenario 2’ considering the impact of 50% affordable housing across all residential developments with 10 or more dwellings. The results for this are shown in Table 7.5, and, as summarised in paragraph 7.21, the results “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.”</p>	<p>London Plan policy. The Council will be working with the GLA and other bodies to ensure that the policy is in conformity with other planning documents and guidelines and is justifiable and evidenced. The Council will also consider the policy's relationship with the London Plan and the NPPF. The Council will be working with the GLA and other bodies to ensure that the policy is in conformity with other planning documents and guidelines and is justifiable and evidenced.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The policy formulation process will account for implications on existing permissions, amendments to existing permissions, long-term schemes. A range of scenarios will be tested for viability as part of the policy formulation process.</p> <p>Once adopted, the revised policy will apply to all new planning applications including large-scale long-term developments. In the period</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>Whilst it noted that this meant that half the tested value 2 area typologies and all the value area 3 typologies would be considered viably able to deliver 50%, it is noted that this Scenario was considered alongside the other Reg19 policies, including the affordable tenure mix of 50% low-cost rent (not the 70% being considered by this consultation). Scenario 2 also did not undergo any sensitivity testing, as the baseline Scenario 1 did (of 35% affordable). It is also considered that following recent updates to guidance and legislation over the past two years in relation to the fire safety requirements for second stair cores in developments, further compound the weakness of the existing Viability Study from Jan 2022 to be able to accurately and robustly assess and test the draft policy.</p> <p>As such, it is considered that the objective to increase affordable housing provision, whilst supported as an objective, is not justified on the current Evidence Base and therefore does not currently meet the tests of soundness as set out in the NPPF.</p> <p>It is therefore requested that the Viability Study is updated (given the items tests and the fact it is two years old) before any changes to the policy are progressed.</p> <p>Application to extant permissions</p> <p>We also note that a number of extant planning permissions that have been granted in line with previous policy are still currently being built out, and/or require reserved matters consent and/or amendments (including to outline consents) following updated safety regulations. We would be grateful if it could be confirmed in the LPPR that this increased threshold requirement for affordable housing will not be applied retrospectively to extant permissions or any required amendments that do not relate to affordable housing rates. This is necessary to ensure that the delivery of already approved schemes, whose affordable requirements have been secured by s106, remain deliverable (as approved) and are also therefore not compromising not only their own deliverability, but wider housing delivery,</p>	<p>ahead of adoption, proposals will be considered on a case-by-case basis in light of the evidence available at that time.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>especially where these permissions are factored in to Wandsworth's Five Year Housing Land Supply.</p> <p>This approach is supported by the current Viability Study (2022) which notes that the viability testing was based on high level Residual Land Values (RLVs) for different site typologies and scheme types. However, at paragraph 1.10 it states "the inputs to the calculation are hard to determine for a specific site (as demonstrated by the complexity of many section 106 negotiations). The difficulties grow when making calculations that represent a typical or average site. Therefore, our viability assessments in this report are necessarily broad approximations based on a typology of sites that may only slightly reflect future delivery".</p> <p>Given the context of a number of specific sites, particularly those with older planning permissions that are still in the process of being built-out (such as through phased Reserved Matters applications), throughout Wandsworth, and the complicated nature of the S106 agreements already agreed and signed, it is considered that sites that have historic planning permission may not be able to achieve a higher affordable rate, given the committed costs and obligations that have already been set. This therefore needs to be appropriately recognised to avoid any delays to the delivery of scheme, which have already been robustly tested and confirmed as accepted in the applicable planning policy context.</p> <p>Do you support our objective that a greater proportion of all new affordable homes to be genuinely affordable, preferably a 70/30 split in favour of social rent?</p> <p>As set out above in Section 5 of this form, the proposed affordable rate, combined with the affordable tenure split are not considered to be justified within the current evidence base, and therefore it is requested that the Viability Study is updated in relation to Policy LP23 accordingly, taking account of scenarios in which the impact of the tenure split of affordable homes, as well as the affordable rate are considered.</p>	

Rep No.	Respondent Name	Comments	Officer's Response
		<p>The current adopted LP23 sets a tenure split requiring at least 50% low cost rent, which is already in excess of the minimum set out by the London Plan Policy H6, which sets a minimum requirement of 30% low cost rent in order to follow the Fast Track approach. To increase this requirement even further above the London Plan, without the relevant evidence base or viability testing, is not considered to be justified and therefore, sound. It would remove flexibility which would impact on the deliverability of scheme.</p> <p>Similarly to the above, it is also requested that it is confirmed that any revised policy will not be applied retrospectively to existing permissions, where the level and tenure of affordable housing has already been assessed and secured via s106 as part of the parent consent.</p> <p>In general, we would note that Wandsworth's Local Plan has only been recently adopted (July 2023) and therefore recently found sound by an Inspector and it is expected that it is up-to-date and does not require review on such a key policy so soon after its adoption. A review of the Local Plan every 5 years is consistent with both NPPF and NPPG expectation, unless a significant change in housing need is expected in the near-future (NPPF paragraph 33). It is clear from the submitted evidence that the housing need has not changed significantly since the assessment of the currently adopted Local Plan, indeed, the same evidence is relied upon, and the recently adopted Local Plan is sound.</p>	
087	Edmund Hewitt	<p>4. Strongly disagree</p> <p>5. 50% is Too Much</p> <p>6. Disagree</p> <p>7. It is too much</p> <p>8. Strongly disagree</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change</p>

Rep No.	Respondent Name	Comments	Officer's Response
088	Michael Hewitt	<p>4. Strongly disagree</p> <p>5. 50% is far too much in small development converting a victorian house into 3 flats</p> <p>6. Strongly disagree</p> <p>7. Not practical in a small conversion producing just 3 flats</p> <p>8. Strongly disagree</p> <p>9. First the process for each small development will further clog up the Planning system which still hasn't recovered to the standard assessment period of 8 weeks we enjoyed pre-covid.</p> <p>10. A conversion project will become far less financial viable with the holding costs of land at present unsustainable with interest rates at a 15 year high, on a £1 million property which is pretty standard in Wandsworth developers are easily paying £12K month in interest waiting for a planning decision, if this increases from an average of 12 weeks to a possible of 70 weeks this alone will make development in the borough unsustainable.</p> <p>Already for small projects to convert a victorian house into 3 flats, the costs of planning permission have risen sharply recently due to stricter sustainability and biodiversity policies.....green/brown roofs, air/ground source heat pumps, photovoltaics, enhanced building insulation, the associated costs of installing all these measures has pushed up building costs considerably on top of the increased material/labour costs since Brexit/Covid.</p> <p>If it becomes too expensive for developers to develop in Wandsworth then the many derelict/run down sites dotted around the borough will not get developed and regenerated which will have a knock on effect on the surrounding street</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>scene and in five years' time Wandsworth will have many rundown buildings/sites around the borough that are not financially viable to regenerate.</p> <p>Finally if small developers stop converting Victorian houses into flats, there will be less supply, thus forcing up rental prices – the exact opposite of what this policy implementation is trying to achieve.</p>	
089	James Hicks, Paradian Ltd	<p>4. Strongly disagree</p> <p>5. This will lead to less affordable housing as has been proved in the past where this has been implemented and thus been withdrawn. It is clear this policy makes any new build development with increasing environmental conditions, build cost, planning costs on development unviable. It will increase rents and affordability for those looking for housing in the borough.</p> <p>6. Disagree</p> <p>7. The balance needs to be more even than 70/30</p> <p>8. Strongly disagree</p> <p>9. This will lead to less affordable housing as has been proved in the past where this has been implemented and thus withdrawn. It is clear this policy makes any new build development with increasing environmental conditions, build cost, planning costs on development unviable. It will increase rents and affordability for those looking for housing in the borough.</p> <p>10. Allow the bigger sites in the borough to pick up the the social housing quota where the larger housebuilders have the wherewithall to deliver.</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>
090	Sam Hill	4. Strongly disagree	Comments noted.

Rep No.	Respondent Name	Comments	Officer's Response
		<p>5. Regulation 18. Implementing Affordable Housing will substantially delay the decision period due to the negotiation period with legals, currently we enjoy decisions in 8-12 weeks but this could increase to 70 weeks. The Planning Inspector who forced Lambeth to drop their Affordable Housing contributions for under 10 units which they were going to implement in their Sept 2021 Local Plan stated taking a sample of 60 schemes for minor developments the decision period took an average of 71 weeks due to the negotiation process of Affordable Homes Contributions. Example where this is currently happening is Southwark Council with over 100 small site schemes currently sitting in limbo awaiting their Affordable sites to be sorted out. Above will only clog up the Planning system further which still hasn't recovered to the standard assessment period of 8 weeks we enjoyed pre-covid. Financial viability; holding costs of land at present is unsustainable with interest rates at a 15 year high, on a £1 million property which is pretty standard in Wandsworth developers are easily paying £12K month in interest waiting for a planning decision, if this increases from an average of 12 weeks to a possible of 70 weeks this alone will make development in the borough unsustainable. Financial viability; costs of achieving planning permission has risen sharply recently due to stricter sustainability and biodiversity policies implemented. All developments now need to include green/brown roofs, air/ground source heat pumps, photovoltaics, enhanced building insulation, the associated costs of installing all these measures has pushed up building costs considerably on top of the increased material/labour costs since Brexit/Covid. If it becomes too expensive for developers to develop in Wandsworth the derelict/run down sites dotted around the borough will not get developed and regenerated which will have a knock on effect on the surrounding street scene and in five years' time Wandsworth will look a very different borough from today with many rundown/derelict buildings/sites around the borough that are not financially viable to regenerate. Simple maths; if developers stop building properties in Wandsworth as it's no longer sustainable/viable there will be less supply, therefore forcing up rental/purchase prices – the exact opposite of what this policy implementation is trying to achieve.</p>	<p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>6. Strongly disagree</p> <p>7. It simply isnt possible to do this for the reasons below: Regulation 18. Implementing Affordable Housing will substantially delay the decision period due to the negotiation period with legals, currently we enjoy decisions in 8-12 weeks but this could increase to 70 weeks. The Planning Inspector who forced Lambeth to drop their Affordable Housing contributions for under 10 units which they were going to implement in their Sept 2021 Local Plan stated taking a sample of 60 schemes for minor developments the decision period took an average of 71 weeks due to the negotiation process of Affordable Homes Contributions. Example where this is currently happening is Southwark Council with over 100 small site schemes currently sitting in limbo awaiting their Affordable sites to be sorted out. Above will only clog up the Planning system further which still hasn't recovered to the standard assessment period of 8 weeks we enjoyed pre-covid. Financial viability; holding costs of land at present is unsustainable with interest rates at a 15 year high, on a £1 million property which is pretty standard in Wandsworth developers are easily paying £12K month in interest waiting for a planning decision, if this increases from an average of 12 weeks to a possible of 70 weeks this alone will make development in the borough unsustainable. Financial viability; costs of achieving planning permission has risen sharply recently due to stricter sustainability and biodiversity policies implemented. All developments now need to include green/brown roofs, air/ground source heat pumps, photovoltaics, enhanced building insulation, the associated costs of installing all these measures has pushed up building costs considerably on top of the increased material/labour costs since Brexit/Covid. If it becomes too expensive for developers to develop in Wandsworth the derelict/run down sites dotted around the borough will not get developed and regenerated which will have a knock on effect on the surrounding street scene and in five years' time Wandsworth will look a very different borough from today with many rundown/derelict buildings/sites around the borough that are not financially viable to regenerate. Simple maths; if developers stop building properties in Wandsworth as it's no longer sustainable/viable there will be less supply, therefore forcing up</p>	

Rep No.	Respondent Name	Comments	Officer's Response
		<p>rental/purchase prices – the exact opposite of what this policy implementation is trying to achieve.</p> <p>8. Strongly disagree</p> <p>9. Regulation 18. Implementing Affordable Housing will substantially delay the decision period due to the negotiation period with legals, currently we enjoy decisions in 8-12 weeks but this could increase to 70 weeks. The Planning Inspector who forced Lambeth to drop their Affordable Housing contributions for under 10 units which they were going to implement in their Sept 2021 Local Plan stated taking a sample of 60 schemes for minor developments the decision period took an average of 71 weeks due to the negotiation process of Affordable Homes Contributions. Example where this is currently happening is Southwark Council with over 100 small site schemes currently sitting in limbo awaiting their Affordable sites to be sorted out. Above will only clog up the Planning system further which still hasn't recovered to the standard assessment period of 8 weeks we enjoyed pre-covid. Financial viability; holding costs of land at present is unsustainable with interest rates at a 15 year high, on a £1 million property which is pretty standard in Wandsworth developers are easily paying £12K month in interest waiting for a planning decision, if this increases from an average of 12 weeks to a possible of 70 weeks this alone will make development in the borough unsustainable. Financial viability; costs of achieving planning permission has risen sharply recently due to stricter sustainability and biodiversity policies implemented. All developments now need to include green/brown roofs, air/ground source heat pumps, photovoltaics, enhanced building insulation, the associated costs of installing all these measures has pushed up building costs considerably on top of the increased material/labour costs since Brexit/Covid. If it becomes too expensive for developers to develop in Wandsworth the derelict/run down sites dotted around the borough will not get developed and regenerated which will have a knock on effect on the surrounding street scene and in five years' time Wandsworth will look a very different borough from today with many rundown/derelict buildings/sites around the borough that are not financially viable</p>	

Rep No.	Respondent Name	Comments	Officer's Response
		to regenerate. Simple maths; if developers stop building properties in Wandsworth as it's no longer sustainable/viable there will be less supply, therefore forcing up rental/purchase prices – the exact opposite of what this policy implementation is trying to achieve.	
091	Sam Hillman, Beam Investments Ltd	<p>4. Strongly disagree</p> <p>5. 50% too much</p> <p>6. Strongly disagree</p> <p>7. Again too much</p> <p>8. Disagree</p> <p>9. I think this plan is absolutely ridiculous and would halt all development. UTTERLY STUPID.</p> <p>10. These are quite possibly the most stupid changes to policy I have ever heard of. Even basic common sense would tell you that increasing the affordable housing requirement is only going to lead to LESS affordable housing. As someone who plans to move to the borough, this is going to make the situation even worse therefore I am totally against it.</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>
092	Spencer Hirst	<p>4. Strongly disagree</p> <p>5. At least 50% is too much - if creating one unit then would have to provide 1:1</p> <p>6. Disagree</p> <p>7. the 70/30 favour split in social rent is too much</p> <p>8. Strongly disagree</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>9. The UK has a housing shortage and smaller developers are able to bridge the gap to solve this solution. Including affordable housing will increase the cost of developments and therefore not make them viable, causing developers to make less money and the housing shortage to get worst. It's a lose-lose situation. It will also increase the time period of which developments take due to negotiations with the council; the longer a project takes, the more profit it needs to make, therefore pushing costs higher and making more projects unviable.</p>	<p>on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p>
093	<p>Roger Hodgson, Sanford Developments</p>	<p>4. Strongly disagree</p> <p>5. 50% allocation is too much and would render almost all developments unviable</p> <p>6. Disagree</p> <p>8. Strongly disagree</p> <p>10. Implementing Affordable Housing will substantially delay the decision period due to the negotiation period with legals, currently decisions can be received in 8-12 weeks but this could increase dramatically (Lambeth has experienced this problem).</p> <p>Ultimately this policy will not deliver its stated goal of more affordable housing as private developers will simply be unable to afford to bring schemes forward (cost of debt at 15 yr high, building costs at an all time high, requirements for environmental protections) and this in turn will exacerbate the pressures on the housing market.</p>	<p>Comments noted.</p> <p>The Council will consider the policy's relationship with the threshold approach and London Plan policy. The Council will be working with the GLA and other bodies to ensure that the policy is in conformity with other planning documents and guidelines and is justifiable and evidenced.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the</p>

Rep No.	Respondent Name	Comments	Officer's Response
			expectations of those engaging with the planning system.
094	Philip Hoodless	<p>4. Strongly disagree</p> <p>5. Affordable housing should be in line with the London Plan guidelines of 35%. Increasing the threshold simply stifles residential development with protracted Viability arguments.</p> <p>6. Strongly disagree</p> <p>7. Again, the increased social rent % simply stifles development, land values remain stubbornly high and developers cannot make the required profit margins to satisfy lending requirements. If Developer cant borrow money to build how can we expect and new homes to be delivered.</p> <p>8. Strongly disagree</p> <p>9. This will completely halt development of small sites an make the lives of SME developers impossible. Lambeth recently reversed their decision on this, because the policy was problematic. Southwark now has a similar problem with lots of small applications stuck in the planning system due to protracted viability negotiations. Why deviate from the London Plan, it makes no sense?</p> <p>It will be a huge mistake for the council to adopt a policy that requires an affordable contribution on schemes with less than 10 units. All this will do is delay planning applications when the industry is facing so many headwinds, and it is unnecessary.</p>	<p>Comments noted.</p> <p>The Council will consider the policy's relationship with the threshold approach and London Plan policy. The Council will be working with the GLA and other bodies to ensure that the policy is in conformity with other planning documents and guidelines and is justifiable and evidenced.</p> <p>The Council will be collecting and testing evidence to support policy changes.</p> <p>Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p>

Rep No.	Respondent Name	Comments	Officer's Response
			<p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>
095	James Hope, R & J partners	<p>4. Strongly disagree</p> <p>5. the expectation for private companies to develop small projects and give up substantial proportion of the development will make projects unaffordable to start and lead to delapidated properties, this bringing the area into disrepair. this attitude is all about reducing profits and quality, therefore no progress, rather than improving the opportunities.</p> <p>6. Strongly disagree</p> <p>7. reduced quality of life</p> <p>8. Strongly disagree</p> <p>9. small projects by small developers will be unaffordable</p> <p>10. It isn't appropriate to have small business to make such a substantial contribution to social housing</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and</p>

Rep No.	Respondent Name	Comments	Officer's Response
			delay in the planning application process and accelerate the delivery of housing.
096	Peter Hopkin, Pad Pad Limited	<p>4. Agree</p> <p>5. We agree that affordable housing is required within the borough but the burden should fall on larger development sites of 10+ units where it is more financially viable to provide these units.</p> <p>6. Agree</p> <p>7. Again we agree that 70/30 split is fair for larger 10+ unit schemes however is not financially viable for these smaller developments</p> <p>8. Strongly disagree</p> <p>9. Our main objections again are:</p> <ul style="list-style-type: none"> • Implementing Affordable Housing will substantially delay the decision period due to the negotiation period with legals, currently we enjoy decisions in 8-12 weeks but this could increase to 70 weeks. The Planning Inspector who forced Lambeth to drop their Affordable Housing contributions for under 10 units which they were going to implement in their Sept 2021 Local Plan stated taking a sample of 60 schemes for minor developments the decision period took an average of 71 weeks due to the negotiation process of Affordable Homes Contributions. Example where this is currently happening is Southwark Council with over 100 small site schemes currently sitting in limbo awaiting their Affordable sites to be sorted out. • Above will only clog up the Planning system further which still hasn't recovered to the standard assessment period of 8 weeks we enjoyed pre-covid. • Financial viability; holding costs of land at present is unsustainable with interest rates at a 15 year high, on a £1 million property which is pretty standard in Wandsworth developers are easily paying £12K month in interest waiting for a 	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>planning decision, if this increases from an average of 12 weeks to a possible of 70 weeks this alone will make development in the borough unsustainable.</p> <ul style="list-style-type: none"> • Financial viability; costs of achieving planning permission has risen sharply recently due to stricter sustainability and biodiversity policies implemented. All developments now need to include green/brown roofs, air/ground source heat pumps, photovoltaics, enhanced building insulation, the associated costs of installing all these measures has pushed up building costs considerably on top of the increased material/labour costs since Brexit/Covid. • If it becomes too expensive for developers to develop in Wandsworth the derelict/run down sites dotted around the borough will not get developed and regenerated which will have a knock on effect on the surrounding street scene and in five years' time Wandsworth will look a very different borough from today with many rundown/derelict buildings/sites around the borough that are not financially viable to regenerate. • Simple maths; if developers stop building properties in Wandsworth as it's no longer sustainable/viable there will be less supply, therefore forcing up rental/purchase prices – the exact opposite of what this policy implementation is trying to achieve. 	
097	Richard Hughes	<p>4. Strongly disagree</p> <p>5. This will almost completely kill all small scale development in the borough. Small developments will become unviable financially and we as a small builder will not be able to continue. This will result in the small derelict buildings in the borough remaining derelict as no builder/ developer will be in a position to take them on. Planning time will increase due to legals and the whole small scale developer sector in the borough will cease overnight.</p> <p>6. Strongly disagree</p> <p>7. This is just not viable on small scale developments such as 3 or 4 flat conversions within an existing building, the financials just don't work</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>8. Strongly disagree</p> <p>9. Again the financials don't stack up. Land is already expensive enough so when you factor in build costs then making a demand that schemes below 10 units have to have an affordable contribution then the schemes are loss making and no developer will be able to continue at this scale</p> <p>10. This proposal could end up having the opposite effect than which is intended. Simple maths; if developers stop building properties in Wandsworth as it's no longer sustainable/viable financially there will be less supply, therefore forcing up rental/purchase prices – the exact opposite of what this policy implementation is trying to achieve</p>	<p>to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>
098	David Huxley, Huxley Land Ltd	<p>4. Strongly disagree</p> <p>5. Affordable Housing</p> <p>6. Strongly disagree</p> <p>7. We need to build more homes. Only increasing supply will reduce rents and sale prices. Making it harder, slower, more complex and more expensive will simply deter development in the borough.</p> <p>8. Strongly disagree</p> <p>9. We need to build more homes. Only increasing supply will reduce rents and sale prices. Making it harder, slower, more complex and more expensive will simply deter development in the borough.</p> <p>10. am very surprised and shocked that Wandsworth planning department think it is a good idea to make the planning system more complex and expensive for developers.</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>This will have the following effects:</p> <ol style="list-style-type: none"> 1. Reduce supply of all types of new homes. 2. Increase rents (due to reduced supply) 3. Increase prices of new homes (due to reduced supply) 4. Slow down the planning system (which is the reverse of what the Labour Government are promising) 5. Increase costs to builders developers, who already have seen costs jump 30% in the last year. (Simply making development unviable) <p>It will have the reverse effect on what it is trying to achieve.</p>	The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.
099	Stella Idowu-Ossei	<ol style="list-style-type: none"> 4. Strongly disagree 6. Strongly disagree 8. Strongly disagree 	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes.</p>
100	Shakeer Idris	<ol style="list-style-type: none"> 4. Strongly agree 5. Because it will people lower/medium working class to pay for housing cost easily without any problems 6. Strongly agree 7. To bridge the gap between rich and the poor 8. Strongly agree 	Support noted.
101	Mahomed Foorqan Ismail	<ol style="list-style-type: none"> 4. Strongly disagree 5. The proportion of social housing proposed at 50% on all developments will mean that people will no longer invest in the Borough as it will not be financially viable for them. Why does the council think that private investors should clean up 	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>the shortage. Private investors use their money, loans and take the risk. The proposal will not be worth the risks involved.</p> <p>6. Strongly disagree</p> <p>8. Strongly disagree</p>	<p>Council will be seeking to ensure that the policy is justified and viable.</p>
102	<p>Nadine James, Barratt London</p>	<p>We write on behalf of our client, Barratt London, in response to the London Borough of Wandsworth's (hereafter referred to as 'LBW') Partial Review of their Local Plan, specifically the Council's proposed amendments to Policy LP23 (Affordable Housing).</p> <p>The LBW adopted their Local Plan in July 2023 following extensive engagement on the preparation of the Plan, which commenced in December 2018, and included an Examination in Public of the draft Local Plan in November 2022. The adopted Wandsworth Local Plan (2023-2038) sets out the Council's 15 year strategic vision, objectives, and spatial strategy to guide development. This includes Policy LP23 (Affordable Housing), which identifies the Council's required affordable housing target for the Borough. Policy LP23 states that:</p> <p><i>"A. The Council will seek to maximise the delivery of affordable housing in accordance with the London Plan which will contribute to securing the Mayor's strategic target of 50% of all new homes to be affordable.</i></p> <p><i>B. Development that creates 10 or more dwellings (gross) on individual sites must provide affordable housing on site's in accordance with the threshold approach set out in London Plan Policy H5.</i></p> <p><i>C. The Council will require an affordable housing tenure split of at least 50% low-cost rent products with a balance other intermediate products...."</i></p> <p>This Partial Review of the Local Plan seeks views from the local community alongside key stakeholders and developers on the proposed amendments to Policy LP23 (Affordable Housing) which includes the following:</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council will consider the policy's relationship with the London Plan and the NPPF. The Council will be working with the GLA and other bodies to ensure that the policy is in conformity with other planning documents and guidelines and is justifiable and evidenced.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p><i>a) Strengthening the Local Plan policy by setting out a clear policy requirement for new housing developments in the borough to provide at least 50 per cent of dwellings as affordable homes delivered on site.</i></p> <p><i>b) Requiring a greater proportion of all new affordable homes to be genuinely affordable, preferably a 70/30 split in favour of social rent.</i></p> <p><i>c) Requiring an affordable housing from small sites below the current threshold of 10 or more homes (gross).</i></p> <p>BARRATT LONDON'S INVOLVEMENT IN LONDON BOROUGH OF WANDSWORTH</p> <p>By way of background, Barratt London have been active developers within the LBW since early 2000s and have delivered a number of high quality schemes across the Borough. More recently, Barratt London were selected by South West London and St Georges Mental Health NHS Trust (SWLSTG) to deliver Phase 5 of the Springfield Masterplan Site and they achieved reserved matters for 298 residential units, including the delivery of 60 affordable units in October 2020 under application ref: 2020/1779 and 2020/1780.</p> <p>Following the successful implementation of Phase 5, Barratt London submitted a full standalone planning application for the comprehensive redevelopment of Plots X,Y,Z,Vb within the wider Springfield Masterplan Site under application ref:2022/5288 in December 2022. As the total number of residential units (839) approved under the outline planning permission (ref:2010/3703 & 2010/3706) had been drawn down under subsequent reserved matters applications, a new standalone planning permission was required for any further development on the wider Masterplan Site and therefore a new planning permission for additional development was pursued.</p> <p>The new standalone application seeks planning permission for the delivery of 449 residential units, including a policy compliant provision of affordable housing i.e. 50% affordable housing (on a habitable room basis) with a tenure split of 50%</p>	

Rep No.	Respondent Name	Comments	Officer's Response
		<p>Social Rent and 50% Shared Ownership. The Scheme will therefore deliver a total of 220 affordable units comprising 125 Shared Ownership and 95 Social Rented units. It should be noted that at the time of submission of the Application, the new Wandsworth Local Plan had not been adopted and the original affordable housing offer comprised of 50% affordable housing, on a habitable room basis, with a 60/40 tenure split (Shared Ownership/Social Rent). A Financial Viability Assessment was submitted in support of the Application, which demonstrated that the Scheme has a substantial financial deficit.</p> <p>Following the adoption of the new Local Plan by the LBW earlier this year, the Applicant amended the affordable housing offer to reflect the revised requirement for 50% Social Rent and 50% other intermediate products. The submitted Viability Assessment has been independently reviewed by the LBW's Viability Assessors, who are in agreement that the delivery of a scheme which proposes 50% affordable housing with a 50/50 tenure split (Shared Ownership/Social Rent) would be unviable.</p> <p>COMMENTARY ON PROPOSED AMENDMENTS</p> <p>As demonstrated above, Barratt London are committed to delivering affordable housing on their Sites' and work proactively with Councils to ensure that the maximum viable quantum of affordable housing is brought forward on each of these sites. Whilst supportive of the delivery of affordable housing, concern is raised however with regard to the proposed amendments to Policy LP23 of the Local Plan. These concerns primarily relate to:</p> <ul style="list-style-type: none"> • Insufficient evidence to support the proposed amendments to policy; • The impact of proposed changes on the delivery of housing; • The impact of the proposed changes on the delivery of affordable housing; and • Conflict with regional policy requirements. Each of these are discussed in further detail below. <p>LACK OF VIABILITY EVIDENCE TO SUPPORT THE REVISED POLICY</p>	

Rep No.	Respondent Name	Comments	Officer's Response
		<p>Paragraph 31 of the National Planning Policy Framework (NPPF) (2023) requires the preparation and review of all policies to be underpinned by relevant and up to date evidence. This evidence should be adequate, proportionate and focused on supporting and justifying the policies concerned, considering relevant market signals. In line with the NPPF therefore, the LBW are required to demonstrate how emerging policies are underpinned with up-to-date evidence. It is noted however that no evidence has been provided as part of this Local Plan Partial Review consultation, specifically as discussed below in relation to the viability impact of the proposed amendments to Policy LP23.</p> <p>A Regulation 19 Local Plan Viability Study was undertaken in January 2022 in relation to the recently adopted Wandsworth Local Plan. With regards to Policy LP23 specifically, the Viability Study identified that Policy LP23 was expected to have an impact on the delivery of the Development Plan and therefore this impact was required to be tested as part of the Viability Study. The Viability Study included an assessment of differing tenure rates (i.e. tenure split proposed between Social Rent and Shared Ownership) proposed and their impact on the deliverability of the plan policies. This testing ultimately informed the draft Regulation 19 Policy on affordable housing. As part of this sensitivity testing, scenarios concerns the delivery of a 60/40 tenure split (60% social rent, 25% First Homes and 15% other intermediate products) and a 70/30 tenure split (70% social rent, 25% First Homes and 5% other intermediate products) were tested. As set out on page 29 of the Viability Study 2022, it was concluded that these tenure mixes (including the requirement for a 70/30 tenure split in favour of Social Rent) were found to place risk on the Local Plan's delivery and as such, the provision of a 50/50 tenure mix was pursued.</p> <p>It is clear from the January 2022 Viability Study therefore that seeking a 70/30 tenure split (in favour of Social Rent) would place an unacceptable risk of the delivery of the Local Plan. We therefore request clarification from the LBW firstly on what additional testing has now been undertaken to demonstrate that the</p>	

Rep No.	Respondent Name	Comments	Officer's Response
		<p>provision of a 70/30 tenure split would not give rise to a greater risk to the deliverability of the policies within the plan and what if any evidence, is available that demonstrates conditions within the market have improved since 2022 which would result in the requirement for a tenure split of 70/30 to be supported in Policy. Until such evidence is provided, the only conclusion which can be drawn is that demonstrated in the 2022 Viability Study, a requirement to deliver a tenure mix of 70/30 in favour of affordable rent would place risk on the delivery of the Local Plan. It should be noted that market conditions have significantly worsened since 2022 and this is having a significant impact on delivery.</p> <p>THE IMPACT OF THE PROPOSED CHANGES ON THE DELIVERY OF HOUSING</p> <p>The delivery of new residential accommodation is a national, regional, and local priority. It is clear however that whilst there is a need to deliver housing at all levels, the current market conditions pose a number of challenges for developers, which has resulted in schemes having to work harder to be viable and therefore deliverable. It is often the case that developments are either being delivered at a profit loss, being brought forward with an affordable housing contribution which is significantly below the policy requirement or are not being pursued.</p> <p>Housing delivery is a key objective of the NPPF which advocates that a sufficient amount and variety of land should come forward to significantly boost the supply of housing (paragraph 60). At a regional level, London Plan Policy H1 (Increasing Housing Supply) states that to ensure Local Planning Authorities achieve their ten year housing targets, boroughs should prepare delivery-focused development plans which allocate an appropriate range and number of sites that are suitable for residential and mixed-use development and intensification, encourage the development on other appropriate windfall sites and enable the delivery of housing capacity in identified Opportunity Areas. The Policy further states that Boroughs should also seek to optimise the potential for housing delivery on all suitable and available brownfield sites. At a local level, Policy SDS1 (Spatial</p>	

Rep No.	Respondent Name	Comments	Officer's Response
		<p>Development Strategy 2023-2038) states that in the period of 2023-2028, 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. It should be noted that this is an increase from 1,320 units per annum under the now superseded LBW Core Strategy however the target now reflects that sought under the London Plan for LBW. Whilst the LBW can demonstrate a five year housing land supply at present, these targets are minimums and given the national, regional, and local priority for delivering housing, the delivery of sustainable and high quality residential developments should be encouraged.</p> <p>The proposed amendments to Policy LP23 would however undermine such delivery of new sites within the Borough and therefore hinder the Council's ability to demonstrate a five year housing land supply and achieve the minimum target of 1,950 new homes per year. The introduction of the proposed amendments to the Policy would discourage developers from bringing forward residential development within the Borough in light of the viability impacts that the policy would place on future schemes. The current market conditions are already resulting in a challenging environment for development to be brought forward, which in combination with the emerging tenure split requirements would only further result in an increase in the amount of schemes becoming unviable, ultimately leaving Sites remain undeveloped in the Borough. Paragraph 68 of the NPPF requires local planning authorities to ensure that planning policies identify a sufficient supply and mix of sites taking into account their availability, suitability, and economic viability. It is clear that the introduction of the proposed amendments to Policy LP23 would be contrary to paragraph 68 of the NPPF as the revised policy would not account for the economic viability pressure the revised policy would have on the deliverability of Site.</p> <p>Furthermore, the adopted Local Plan identifies acceptable areas for both tall and mid-rise buildings. If Sites are not located within either of these designations, the Council would seek to restrict such proposals. In order to achieve the revised tenure, mix on sites, it is likely that developments would need to increase in size</p>	

Rep No.	Respondent Name	Comments	Officer's Response
		<p>to accommodate the required affordable housing provision. This however may cause conflict with Local Plan Policy LP4 (Tall and Mid-rise Buildings) which seeks to restrict proposals for mid and tall rise buildings outside of identified building zone and therefore the proposed amendments to Policy LP23 would create conflict with other policies in the plan and prohibit the delivery of housing (private and affordable) across the borough.</p> <p>THE IMPACT OF THE PROPOSED CHANGES ON THE DELIVERY OF AFFORDABLE HOUSING</p> <p>As set out above, the proposed amendments to Policy LP23 seek to revise the affordable housing tenure split from 50/50 to 70/30 in favor of Social Rent. As set out above this change is likely to have an impact on not only the overall delivery of housing within the Borough but also the overall quantum of affordable housing which could be delivered on individual schemes. This would be counterintuitive to the aspirations of the Council with regard to increasing the number of affordable units in the Borough, as to support an increased provision of Social Rented units it is likely that the overall percentage of affordable housing would need to be reduced to ensure that developments remain viable. Given that the Council at present are experience a number of applications which do not propose a policy compliant provision of affordable housing, it is envisaged that such proposed changes would further reduce the quantum of affordable housing likely to be delivered on Scheme.</p> <p>This can be seen in practice on the Springfield Hospital Plots X, Y, Z Application, where based on a 2-bedroom flat measuring 70 sq. m., the value difference between a Shared Ownership unit and a Social Rent unit is estimated to be c.£260,000. Furthermore, it should be noted that the change in the affordable housing from a 60/40 tenure split in favor of Shared Ownership to Social Rent resulted in an increased in the identified viability deficit of circa. £6m. Therefore increasing the required number of Social Rent homes impacts the deliverability of</p>	

Rep No.	Respondent Name	Comments	Officer's Response
		<p>the proposals at Springfield Hospital as has been agreed between Barratt's and the Council's viability consultants.</p> <p>It is clear that the delivery of more Social Rented units will ultimately have a negative impact on the viability of schemes. Therefore, if the Council are committed to ensuring 50% of units on Sites are affordable there needs to be an element of flexibility between tenure types to ensure that this overarching target can be achieved. A shift in the requirement for a greater quantum Social Rented units would only reduce the overall amount of affordable housing that can be delivered on the Site. As such, the introduction of such requirements would have a detrimental impact on the delivery of affordable housing within the Borough.</p> <p>CONFLICT WITH REGIONAL POLICY REQUIREMENTS</p> <p>Finally, it is understood that the LBW are exploring strengthening policy LP23 by setting out a clear policy requirement for new housing development in the borough to provide at least 50% of dwellings as affordable homes delivered on Site.</p> <p>At present, Policy LP23 (Affordable Housing), whilst acknowledging the London Plan strategic target of 50% of homes to be affordable across London, requires under part B of the Policy that affordable housing is to be delivered in accordance with the thresholds set out within Policy H5 (Threshold approach to applications) of the London Plan. Policy H5 of the London Plan states that the threshold level of affordable housing on gross residential development is initially set at:</p> <ol style="list-style-type: none"> 1) A minimum of 35%; or 2) 50 per cent for public sector land where there is no portfolio agreement with the Mayor; or 3) 50 per cent for Strategic Industrial Locations, Locally Significant Industrial Sites and Non-Designated Industrial Sites appropriate for residential uses in accordance with Policy E7 Industrial intensification, co-location, and substitution where the scheme would result in a net loss of industrial capacity. 	

Rep No.	Respondent Name	Comments	Officer's Response
		<p>Therefore the current wording of Policy LP23 (specifically part B) accords with the London Plan requirements and enables schemes to follow the fast track threshold requirements. If however as part of this partial review the LBW introduce a blanket requirement that all development would need to deliver 50% affordable housing on Site then this would give rise to a policy conflict between the London Plan and LBW Local Plan. As set out within paragraph 1.8 of the Wandsworth Local Plan, the Greater London Authority (GLA) Act 1999 requires Local Plan to be in 'general conformity' with the London Plan, as such the Local Plan should align with the London Plan unless there is local evidence and circumstances which would justify a different approach. Whilst the requirement for 50% affordable housing on the Site accords with the Mayor's strategic affordable housing target for London, requiring all development to deliver 50% affordable housing (negating the Fast Track Route) would be in conflict with the London Plan and evidence has not been provided to demonstrate the local need for this.</p> <p>CONCLUDING THOUGHTS</p> <p>As identified through these representations, Barratt London are supportive of the delivery of affordable housing however these representations have clearly demonstrated that the introduction of the proposed amendments to Policy LP23 would undermine the delivery of residential development within the Borough. The introduction of these policy amendments would be detrimental to the delivery of not only residential accommodation in the Borough but also affordable housing where there is an increasing national, regional, and local need for housing. The Partial Review of the Local Plan is not supported by a up to date and robust evidence base and therefore it is unclear if the policy amendments to a tenure split of 70/30 (in favour of Social Rent) would risk the delivery of the Local Plan as concluded within the LB Wandsworth Viability Study (2022).</p>	
103	Bob Jandoo, PMP Ltd	<p>4. Strongly disagree</p> <p>5. Too high</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>6. Strongly disagree</p> <p>7. Again too much</p> <p>8. Strongly disagree</p> <p>9. The formula you are proposing will make developing unaffordable, leaving sites derelict driving up property prices and rents. It will create the opposite to what you are trying to achieve</p>	<p>testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>
104	Adele Jeavons	<p>4. Strongly disagree</p> <p>5. LP23 Small developers and individuals will not be able to compete with large developers</p> <p>6. Strongly disagree</p> <p>7. LP23 - genuinely affordable - less development because of high taxes will result in fewer homes and higher rents</p> <p>8. Strongly disagree</p> <p>9. It just restricts small businesses and will eventually effect the rents in the area which will then no longer be affordable for the average resident</p>	<p>Comments noted.</p> <p>The Council will be seeking to update the January 2022 Porter Planning Economics report alongside an update of the Local Housing Needs Assessment, which will consider changes in the economy, and in housing need, in the intervening period.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p>
105	Roger Jelley, Aspen Homes Ltd	<p>4. Strongly disagree</p> <p>5. Above question</p> <p>6. Agree</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>7. Above question</p> <p>8. Strongly disagree</p> <p>9. As above</p>	
106	Sharon Jenkins, Natural England	<p>Thank you for your consultation request on the above Strategic Planning Consultation, dated and received by Natural England on 20TH October 2023.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England have no comments to make on this consultation.</p>	No response required.
107	B Jennings	<p>4. Strongly disagree</p> <p>5. There is a big danger that unintended consequences stop development in the borough altogether.</p> <p>6. Strongly disagree</p> <p>7. There are too few houses already. This policy risks putting further limits where what we need is more homes.</p> <p>8. Strongly disagree</p> <p>9. Were there any reasons why the legislator introduced 10 site limit? Did these reasons cease ?</p> <p>10. It's saddening to see how not in my backyard wins.</p>	<p>Comments noted.</p> <p>The WBC Transport Committee considered a paper on 21st September 2021 which detailed the reasoning behind The Council's decision to progress to Regulation 18 on the partial review of the Local Plan. Minutes from the WBC Transport Committee meeting on Thursday 21st September can be viewed publicly here.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p> <p>The 10-unit figure is derived from the National Planning Policy Framework, where major development is defined as</p>

Rep No.	Respondent Name	Comments	Officer's Response
			development where 10 units or more are provided.
108	Max Johnson	<p>4. Strongly disagree</p> <p>5. I believe that the current provision in the borough goes above and beyond and the borough will see a major reduction in new, innovative schemes as they will no longer be viable. Residential developers will no longer view the borough as an attractive investment opportunity and the council will have to find alternative ways of sourcing AH as the actual numbers will most likely drop.</p> <p>6. Strongly disagree</p> <p>7. As above, viability will simply lead to developers transacting in other boroughs.</p> <p>8. Strongly disagree</p> <p>10. 'Punishing' (for want of a better word) smaller developers seems a delusional policy.</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p>
109	Billy Kenneally, Kendon Developments Llp Rookstone	<p>4. Strongly disagree</p> <p>5. if what is proposed happens we will stop developing and shut our business down we are small developers and we provide good apartments we are just about breaking even as things stand but we will not continue if the proposal comes into effect as it will not be viable it is absolute madness</p> <p>6. Strongly disagree</p> <p>7. no developer will agree with this as it becomes unworkable and not feasible</p> <p>8. Strongly disagree</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>9. small developers do not have the resources of big builders and the will pull out of developing leaving a massive shortage of stock</p> <p>10. this is a crazy and stupid proposal which is unworkable we will not develop any more properties if this is implemented</p>	<p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p>
110	Alia Khan, Habinteg	<p>As an expert housing provider, we welcome the opportunity to comment on the development of your local plan.</p> <p>Habinteg strongly supports the update of the policy LP23 Affordable housing and other policies to strengthen provision of homes for social rent for local people. We do ask you also consider social housing for older and disabled people. We would further ecommends that all new homes meet Building Regulations M4 Category 2 accessible and adaptable standard homes to meet the needs of disabled and older people in Wandsworth. However, we do recommend that you specifically include clear percentages of new M4(2) homes required.</p> <p>In order to address a deficit of wheelchair accessible homes, Habinteg recommends that 10% of all new homes meet Part M4 (3) Standard (wheelchair user dwelling) irrespective of being market or affordable dwellings.</p> <p>The local plan needs to:</p> <ul style="list-style-type: none"> • Establish clear requirements for a proportion of all new housing to be built to the Building Regulations optional access standards. • Specifically name M4(2) and M4(3) standards in its plan with clear percentages of new homes required in each, regardless of whether a regional strategy or plan indicates an overarching requirement or not. 	<p>Comments noted.</p> <p>The Council will be seeking to update the January 2022 Porter Planning Economics report alongside an update of the Local Housing Needs Assessment, which will consider changes in the economy, and in housing need, in the intervening period.</p> <p>The Council will be producing an updated Housing Needs Assessment as part of the Local Plan Partial Review. This assessment will outline need for accessible homes (including for specialist and supported needs) in the Borough so that scenarios can be tested in the Viability Assessment.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>Habinteg strongly recommends that all new homes meet Building Regulations M4 Category 2 accessible and adaptable standard homes to meet the needs of disabled and older people in Wandsworth.</p> <p>Further, to address a deficit of wheelchair accessible homes, Habinteg recommends that 10% of all new homes meet Part M4 (3) Standard (wheelchair user dwelling) irrespective of being major developments or specialist housing.</p> <p>Key data to consider</p> <ul style="list-style-type: none"> • 14.1 million people in the UK are disabled (Scope) • 45% of pension age adults are disabled • 1.2 million people use wheelchairs (NHS) • 400,000 wheelchair users nation wide are living in homes that are neither designed with wheelchai users in mind nor adapted to suit their particular needs. (Habinteg, using EHS data) • Disabled people of working age with appropriate, accessible homes are four times more likely to be in work than those in unsuitable properties. (Habinteg and Papworth Trust) • 1.5% of homes outside London are set to be built to wheelchair dwelling standards between 2020 and 2030. (Habinteg, insight report 2020) <p>Exemplar policy:</p> <p>A national accessible homes deficit with a local solution</p> <p>The English Housing survey reported that 91% of existing homes do not provide the four access features for even the lowest level of accessibility – a home that is 'visitable'.</p> <p>Habinteg's Insight Report: A Forecast for Accessible Homes 2020 found that just 31.5% of homes are required to meet an accessible housing standard above the current relatory baseline - M4(1) between 2020 and 2030. This will compound the national accessible homes deficit.</p> <p>It is essential that all new homes deliver greaer accessibility and adaptability to help meet the national accessible homes deficit.</p>	

Rep No.	Respondent Name	Comments	Officer's Response
		<p>Local benefits of increased supply of adaptable and accesible homes and wheelchair user dwellings.</p> <p>New homes that meet category M4(2) will deliver:</p> <ul style="list-style-type: none"> • faster hospital discharges • less costly and speedier adaptations when required • reduced local government expenditure on domicillary care packages by supporting individual independence within the home • delay or avoid moves to more expensive residential care settings • provide a better environment for ongoing independence when needs change. <p>Providing suitably accessible homes in a welcoming and inclusively designed neighbourhood can transform the lives of people who are so often left to 'make do' in unsuitable accommodation.</p> <p>Habinteg tenants have reported that having their need for accessible homes met can have wide-ranging positive impacts:</p> <ul style="list-style-type: none"> • finding and maintaining employment • Improved family life such as the ability to access their children's rooms or to cook a family meal • the ability to come and go as they wish to visit family and friends • general health and wellbeing improvements. 	
111	Michal Komirski	<p>4. Strongly agree.</p> <p>6. Strongly agree.</p> <p>7. It's nearly impossible to rent a decent flat on private market, if you are on benefits. We need to solve this problem in the near future.</p> <p>8. Strongly agree.</p>	Support noted.

Rep No.	Respondent Name	Comments	Officer's Response
112	Christian Kortlang, Marston Properties Ltd	<p>4. Strongly disagree</p> <p>5. 50% affordable house will negatively effect the viability of residential development in Wandsworth, which in turn will limit supply and increase house prices.</p> <p>6. Strongly disagree</p> <p>7. This will make residential development even more unviable, as Social Rented units generate the lowest returns, they essentially break even.</p> <p>8. Strongly disagree</p> <p>9. This will make all small residential developments in the Borough unviable and ultimately restrict supply. As a company we would not undertake any further residential development in the Borough. Smaller sites (under 9) units are expensive as they do not benefit from economies of scale. Such policies will kill the development of small sites in the Borough. Viability tested affordable housing off set payments are more suitable in these instances.</p> <p>10. Marston Properties are a 4th Generation ProCo based in Fulham with development and investment assets in Wandsworth. If the above proposed policy changes to affordable housing come into effect, we will be unlikely to undertake any residential development in the future in Wandsworth. Instead we would focus our attention to pro-development Boroughs, which adopt and implement National Policy on affordable housing. Your proposals will drive developers out of the Borough, which in turn will reduce supply. Furthermore, such policy only push up house prices for new builds as ultimately the end users would pay the additional 'taxes' proposed.</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>
113	Shikha Kumar	<p>4. Strongly agree</p> <p>5. 50% is too much - it will kill small development</p>	Comments noted.

Rep No.	Respondent Name	Comments	Officer's Response
		<p>6. Disagree</p> <p>7. Again it's too much</p> <p>8. Strongly disagree</p> <p>9. It will kill small development</p> <p>10. Above will only clog up the Planning system further which still hasn't recovered to the standard assessment period of 8 weeks we enjoyed pre-covid.</p> <p>Financial viability; holding costs of land at present is unsustainable with interest rates at a 15 year high, on a £1 million property which is pretty standard in Wandsworth developers are easily paying £12K month in interest waiting for a planning decision, if this increases from an average of 12 weeks to a possible of 70 weeks this alone will make development in the borough unsustainable.</p> <p>Financial viability; costs of achieving planning permission has risen sharply recently due to stricter sustainability and biodiversity policies implemented. All developments now need to include green/brown roofs, air/ground source heat pumps, photovoltaics, enhanced building insulation, the associated costs of installing all these measures has pushed up building costs considerably on top of the increased material/labour costs since Brexit/Covid.</p> <p>If it becomes too expensive for developers to develop in Wandsworth the derelict/run down sites dotted around the borough will not get developed and regenerated which will have a knock on effect on the surrounding street scene and in five years' time Wandsworth will look a very different borough from today with many rundown/derelict buildings/sites around the borough that are not financially viable to regenerate.</p>	<p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		Simple maths; if developers stop building properties in Wandsworth as it's no longer sustainable/viable there will be less supply, therefore forcing up rental/purchase prices – the exact opposite of what this policy implementation is trying to achieve.	
114	Dominic Lambrecht, Indigo Ridge Developments Ltd	<p>4. Strongly disagree</p> <p>5. It is far too much</p> <p>6. Disagree</p> <p>7. Too much</p> <p>8. Strongly disagree</p> <p>9. This will kill the small site developments</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>
115	Luke Lanigan	<p>4. Strongly agree</p> <p>5. 50% too much, should be focused on larger development sites of 10+ units</p> <p>6. Disagree</p> <p>7. Too much</p> <p>8. Strongly disagree</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy on overall housing delivery of a range of</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>9. This policy change will clearly significantly increase lead times in the redevelopment of properties and make the majority of smaller developments unviable meaning new homes targets which are desperately needed in the borough are missed by a country mile</p>	<p>tenures in different scenarios, such as on small sites.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>
116	Tom Lawson, Ballymore Group	<p>We write to make representations on the London Borough of Wandsworth's Local Plan Review – Regulation 19 Version. These comments seek to build on the substantial engagement between the Council and Ballymore during the previous consultation events for the recently adopted Wandsworth Local Plan (July 2023).</p> <p>As you may be aware, Ballymore has significant development landholdings within the Borough. Ballymore is nearing completion of the Embassy Garden Scheme in Nine Elms which once completed will deliver up to 1,750 residential units and circa 45,000 sqm of commercial and retail space. We also have other land holdings and options within the area with the potential future development. They are therefore intrinsically interested in the policy direction for this area and the Wider Borough.</p> <p>In terms of plan-making, the National Planning Policy Framework (NPPF 2023) is clear that the “planning system should be genuinely plan-led” (para 15) and to this end Plans should:</p> <ul style="list-style-type: none"> • <i>“be prepared positively, in a way that is aspirational but deliverable” (para 15b).</i> • <i>“contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals” (para 15c).</i> <p>Para 31 goes on to state that <i>“The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals”.</i></p>	<p>Comments noted.</p> <p>The WBC Transport Committee considered a paper on 21st September 2021 which detailed the reasoning behind The Council's decision to progress to Regulation 18 on the partial review of the Local Plan. Minutes from the WBC Transport Committee meeting on Thursday 21st September can be viewed publicly here.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council will consider the policy's relationship with the threshold approach and London Plan policy. The Council will be working with the GLA and other bodies to ensure that the policy is in conformity with other planning documents and guidelines and</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>We note that the Reg 18 Consultation forms a Partial Review of the adopted Local Plan and seeks to update Policy LP23 Affordable Housing. However, the Notice of Consultation does not provide any amended wording for policy LP23 or indication as to how developers/applicants and indeed the Council would apply the proposed amendments to new development. Rather the Notice of Consultation indicates a series of broad Policy aspirations, but with now meaningful clarification as to how any amended Policy would work in practice.</p> <p>In our view, the Notice of Consultation falls short of meeting the guidance set out within the NPPF (as per para 15 of the NPPF). Furthermore, the Council has failed to provide an evidence base – covering housing need within the Borough and assessing the viability/deliverability of the proposed amendment to Policy LP23 – to justify the amendments and demonstrate they would be deliverable. (again failing to meet the requirements of para 31 and the tests of soundness set out in para 35 of the NPPF).</p> <p>We are also aware that the Council has just completed the adoption of their Local Plan, which was supported by an extensive evidence base and tested at an Examination in Public. This included the completion and testing of detailed evidence on housing need within the Borough and viability/deliverability. There is no explanation within the latest Regulation 18 Consultation clarifying the change in circumstances (either within the Local Plan evidence base or market conditions) which underpins and justifies an update to Policy LP23.</p> <p>Notwithstanding the deficiencies with the Regulation 18 Notice and Consultation, we are concerned with the content of the current consultation on the Local Plan Partial Review, specifically the intended increase in Wandsworth's affordable housing target to 50% within new development and the changes in the proposed tenure split to 70/30 in favour of social rented accommodation. This represents a clear departure from London Plan Policy H5 and the threshold approach and it is</p>	<p>is justifiable and evidenced. The Council will also consider the policy's relationship with the NPPF. The Council will be working with appropriate bodies to ensure that the policy is in conformity with other planning documents and guidelines and is justifiable and evidenced.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>not clear (from the consultation) how an amended Local Plan Policy LP23 would work alongside adopted strategic policy.</p> <p>LB Wandsworth has an adopted housing target of 1,950 homes per annum (or 19,500 over the 10yr period up to 2029). The Regulation 18 Consultation provides no evidence to demonstrate that the updates to the affordable housing target and preferred tenure split would still enable Wandsworth to meet and maintain its housing supply in line with the housing target.</p> <p>In our view, there is a risk that updates to Policy LP23 will impact upon the viability of new development and impact upon housing delivery. In turn, this would work against the Council's ambition to increase the delivery of affordable housing.</p> <p>The Council previously commissioned a Wandsworth Reg 19 Local Plan Viability Study undertaken by Porter Planning Economics and Three Dragons to support the approach set out within the recently adopted Local Plan. This is dated January 2022 with evidence collated from the proceeding years.</p> <p>The Wandsworth Reg 19 Local Plan Viability Study considers a series of viability scenarios for the Borough. Notably Table 7.5 Viability of residential site typologies under alternative Scenario 2 considers 50% Affordable Homes albeit a tenure mix of 50% Social and 50% Intermediate. This approach shows that circa one third of the scenarios tested and importantly, on average the larger area sites were not viable at the time of report production. A number of sites were identified as borderline viable and it is likely that any change to the scenario (such as changing the social to intermediate split) could render them unviable.</p> <p>Since this point the Building Cost Information Service (BCIS) All in Tender Price Index, a key measurement of construction costs, has increased by circa 10%. Combined with recent interest rates rises by the Bank of England and stagnating house prices even when reassessing the same policy approach; it would likely show an overall detriment to viability.</p>	

Rep No.	Respondent Name	Comments	Officer's Response
		<p>Requiring a greater proportion of affordable housing can only compound the issue and raise doubts regarding delivery of homes to meet the Councils targets. Notwithstanding the clear viability implications associated the greater provision of affordable homes compared to market housing or amended tenure splits (for example the shift from Shared Ownership to Social Rent is around £400 psf difference in value), there are also wider issues associated with the delivery of affordable homes.</p> <p>Through our experience in the development market, we are aware that, like market homes, the value of affordable homes has also been impacted in the past few years. This has been driven by internal costs within the Registered Social Landlords led by inflation as well as a vastly reduced number of Registered Social Landlords actively operating in the market reducing competition.</p> <p>Furthermore, we are aware that the London Borough of Wandsworth if not supportive of "for profit" Registered Social Landlords reducing the competition further within the Borough and ultimately the value of affordable homes.</p> <p>Grant funding has the ability to offset some of the above gaps, notably under the new programme recently announced by the Greater London Authority. However, the cyclical nature of the funding means it is difficult to predict and rely upon especially at application stage. This uncertainty is a significant risk when considering whether to proceed towards the delivery of new housing sites.</p> <p>Overall, in addition to the issues facing build costs and market home values there are concerns regarding the values which can be secured for affordable housing within the Borough. This again impacts on the overarching viability of development within Wandsworth and the ability to delivery new homes.</p> <p>This concern is already present in the wider market where many conventional housing schemes are stalling or being replaced by other uses such as Purpose-</p>	

Rep No.	Respondent Name	Comments	Officer's Response
		<p>Built Student Accommodation or industrial floorspace. Without detailed evidence the potential impact cannot be understood.</p> <p>It is readily apparent that this test within the NPPF has not been met as part of the Local Plan Partial Review. If the Council is intent on undertaking a review of Policy LP23 that this exercise is completed on the basis of an updated evidence base including a review of housing need and a thorough viability assessment of the impact of proposed amendments. Without this important work, any proposed change to Policy LP23 will not meet the tests of soundness set out within the NPPF and would be unsound.</p> <p>Whilst we are critical of the nature of the Regulation 18 consultation, we recognise the importance of continuing to keep local planning policy under review to ensure that it up-to-date and reflective of current circumstances. We are willing to work with the Council to develop an updated policy position which is supported by a robust evidence base.</p> <p>We trust the contents of this letter are self-explanatory and we look forward to engaging with the Council further on the formation of the Partial Review.</p>	
117	Christine Lee	<p>4. Strongly disagree</p> <p>5. 50% is too much</p> <p>6. Disagree</p> <p>7. Too much</p> <p>8. Strongly disagree</p> <p>9. Making development financially unviable and therefore run down buildings or sites don't get developed.</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>

Rep No.	Respondent Name	Comments	Officer's Response
118	Lee Levett	<p>4. Strongly disagree</p> <p>6. Strongly disagree</p> <p>8. Strongly disagree</p> <p>10. The Council do not seem to understand that making changes to the Local Plan policy LP23 will have a detrimental effect on development. It is already near impossible to make developments stack financially due to high build and finance costs and making changes to the Local Plan policy LP23 will just make it impossible for any development to take place which will have the opposite effect to that which the council is trying to achieve. Developers of both new and refurbished homes will simply walk away from development deals as there will be no financial incentive to develop and therefore fewer homes will be available for both sale or rent which in turn will push prices even higher on those that are available pushing homes even further out of the reach of local residents.</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>
119	Edward Ledwidge, Angle Property (York Road) Ltd	<p>We write on behalf of our client, Angle Property (York Road) Limited, in response to the London Borough of Wandsworth's (hereafter referred to as 'LBW') Partial Review of their Local Plan, specifically the Council's proposed amendments to Policy LP23 (Affordable Housing).</p> <p>The LBW adopted their Local Plan in July 2023 following extensive engagement on the preparation of the Plan, which commenced in December 2018, and included an Examination in Public of the draft Local Plan in November 2022. The adopted Wandsworth Local Plan (2023-2038) sets out the Council's 15 year strategic vision, objectives, and spatial strategy to guide development. This includes Policy LP23 (Affordable Housing), which identifies the Council's required affordable housing target for the Borough. Policy LP23 states that:</p> <p><i>"A. The Council will seek to maximise the delivery of affordable housing in accordance with the London Plan which will contribute to securing the Mayor's strategic target of 50% of all new homes to be affordable.</i></p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs (including housing trajectory) and will seek to find a</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p><i>B . Development that creates 10 or more dwellings (gross) on individual sites must provide affordable housing on site's in accordance with the threshold approach set out in London Plan Policy H5.</i></p> <p><i>C. The Council will require an affordable housing tenure split of at least 50% low-cost rent products with a balance other intermediate products....”</i></p> <p>This Partial Review of the Local Plan seeks views from the local community alongside key stakeholders and developers on the proposed amendments to Policy LP23 (Affordable Housing) which includes the following:</p> <p><i>a) Strengthening the Local Plan policy by setting out a clear policy requirement for new housing developments in the borough to provide at least 50 per cent of dwellings as affordable homes delivered on site.</i></p> <p><i>b) Requiring a greater proportion of all new affordable homes to be genuinely affordable, preferably a 70/30 split in favour of social rent.</i></p> <p><i>c) Requiring an affordable housing from small sites below the current threshold of 10 or more homes (gross).</i></p> <p>ANGLE PROPERTY'S INVOLVEMENT IN LONDON BOROUGH OF WANDSWORTH</p> <p>Angle Property are the owners of the Shell Savoy Petrol Filling Station, 262 York Road, Wandsworth SW18 1TP.</p> <p>It is intended that the site will be redeveloped for mixed use purposes in the early part of the current plan period. Planning permission has previously been granted for the following:</p> <p><i>“Demolition of the existing buildings and structures and the erection of a ground plus 8-storey building to provide a 185 sq m commercial unit (Class A1, A2 and/or B1) and 31 space car park on the ground floor with 89 flats above along with related access/servicing areas and basement plant/cycle stores” (LPA Ref:2016/5329)</i></p>	<p>balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council will consider the policy's relationship with the London Plan and the NPPF. The Council will be working with the GLA and other bodies to ensure that the policy is in conformity with other planning documents and guidelines and is justifiable and evidenced.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>The approved scheme comprises 89 flats for rent. Further to viability testing this included provision of 18 units at a discounted market rent comprising 20% intermediate affordable housing.</p> <p>This proposition has not been brought forward due to constraints imposed by the existing lease. However, discussions are ongoing and it is envisaged that discussions with LBW regard a revised development proposal will be progressed shortly.</p> <p>The proposals are likely to include mixed commercial uses at ground floor and a living accommodation on upper floors. However, options for commercial development are also being explored.</p> <p>COMMENTARY ON PROPOSED AMENDMENTS</p> <p>Angle Property are committed to delivering affordable housing where feasible and work proactively with Councils to ensure that the maximum viable quantum of affordable housing is brought forward.</p> <p>Whilst supportive of the delivery of affordable housing in principle the following concerns are raised with regard to the proposed amendments to Policy LP23 of the Local Plan:</p> <ul style="list-style-type: none"> • Conflict with regional policy requirements. • Insufficient evidence to support the proposed amendments to policy; • The impact of proposed changes on regeneration of sites to deliver housing; • The impact of the proposed changes on the delivery of affordable housing; and <p>Each of these are discussed in further detail below.</p> <p>CONFLICT WITH LONDON PLAN POLICY REQUIREMENTS</p>	

Rep No.	Respondent Name	Comments	Officer's Response
		<p>Adopted Policy LP23 (Affordable Housing), whilst acknowledging the London Plan strategic target of 50% of homes to be affordable across London, requires under part B of the Policy that affordable housing is to be delivered in accordance with the thresholds set out within Policy H5 (Threshold approach to applications) of the London Plan. Policy H5 of the London Plan states that the threshold level of affordable housing on gross residential development is initially set at:</p> <ol style="list-style-type: none"> 1) A minimum of 35%; or 2) 50 per cent for public sector land where there is no portfolio agreement with the Mayor; or 3) 50 per cent for Strategic Industrial Locations, Locally Significant Industrial Sites and Non-Designated Industrial Sites appropriate for residential uses in accordance with Policy E7 Industrial intensification, co-location, and substitution where the scheme would result in a net loss of industrial capacity. <p>Adopted Policy LP23 therefore accords with the London Plan requirements and enables schemes to follow the fast track threshold requirements.</p> <p>The partial review of LB23 proposes a blanket requirement that all development would need to deliver 50% affordable housing on Site then this would give rise to a policy conflict between the London Plan. The Greater London Authority Act 1999 requires Local Plan to be in 'general conformity' with the London Plan, as such the Local Plan should align with the London Plan unless there is local evidence and circumstances which would justify a different approach. Whilst the requirement for 50% affordable housing on the Site accords with the Mayor's strategic affordable housing target for London, requiring all development to deliver 50% affordable housing (negating the Fast Track Route) would be in conflict with the London Plan and evidence has not been provided to demonstrate the local need for this.</p> <p>LACK OF VIABILITY EVIDENCE TO SUPPORT THE REVISED POLICY</p>	

Rep No.	Respondent Name	Comments	Officer's Response
		<p>Paragraph 31 of the National Planning Policy Framework (NPPF) (2023) requires the preparation and review of all policies to be underpinned by relevant and up to date evidence. This evidence should be adequate, proportionate and focused on supporting and justifying the policies concerned, considering relevant market signals. In line with the NPPF therefore, the LBW is required to demonstrate how emerging policies are underpinned with up-to-date evidence. It is noted however that no evidence has been provided as part of this Local Plan Partial Review consultation.</p> <p>The Regulation 19 Local Plan Viability Study undertaken in January 2022 supported Policy LP23 as it was necessary to test impact on the delivery of the Development Plan objectives. This included sensitivity testing scenarios concerning the delivery of a 60/40 tenure split (60% social rent, 25% First Homes and 15% other intermediate products) and a 70/30 tenure split (70% social rent, 25% First Homes and 5% other intermediate products) both of which were found to place risk on the Local Plan's delivery and as such, the provision of a 50/50 tenure mix was pursued (Page 29).</p> <p>The absence of a robust evidence base brings into question the soundness of the proposed amendment. This is particularly the case as market conditions have significantly worsened since 2022 and this is having a significant impact on delivery. We respectfully request clarification from the LBW on this matter.</p> <p>THE IMPACT OF THE PROPOSED CHANGES ON THE DELIVERY OF HOUSING</p> <p>The delivery of new residential accommodation is a national, regional, and local priority. The current market conditions pose a number of challenges for developers which has resulted in schemes having to work harder to be viable and therefore deliverable.</p>	

Rep No.	Respondent Name	Comments	Officer's Response
		<p>Housing delivery is a key objective of the NPPF which advocates that a sufficient amount and variety of land should come forward to significantly boost the supply of housing (paragraph 60).</p> <p>At a regional level, London Plan Policy H1 (Increasing Housing Supply) states that to ensure Local Planning Authorities achieve their ten year housing targets, boroughs should prepare delivery-focused development plans which allocate an appropriate range and number of sites that are suitable for residential and mixed-use development and intensification, encourage the development on other appropriate windfall sites and enable the delivery of housing capacity in identified Opportunity Areas. The Policy further states that Boroughs should also seek to optimise the potential for housing delivery on all suitable and available brownfield sites.</p> <p>At a local level, Policy SDS1 (Spatial Development Strategy 2023-2038) states that in the period of 2023-2028, 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 in accordance with the London Plan.</p> <p>Whilst the LBW can demonstrate a five year housing land supply at present, these targets are minimums and given the national, regional, and local priority for delivering housing, the delivery of sustainable and high quality residential developments should be encouraged.</p> <p>The proposed amendments to Policy LP23 would potentially undermine delivery of new housing sites within the Borough and therefore hinder the Council's ability to meet and exceed its minimum housing requirement of 1,950 new homes per year. The proposed amendments would discourage landowners from bringing forward residential development on their sites due to an increased burden that would impact viability.</p>	

Rep No.	Respondent Name	Comments	Officer's Response
		<p>The current market conditions are already resulting in deliverability challenges and additional policy burdens will result in even fewer sites coming forward for development. Paragraph 68 of the NPPF requires local planning authorities to ensure that planning policies identify a sufficient supply and mix of sites taking into account their availability, suitability, and economic viability.</p> <p>It is clear, therefore, that the introduction of the proposed amendments to Policy LP23 without a robust evidence base would impact economic viability and hence conflict with the requirements of Paragraph 68.</p> <p>THE IMPACT OF THE PROPOSED CHANGES ON THE DELIVERY OF AFFORDABLE HOUSING</p> <p>The proposed amendments to Policy LP23 is likely to impact delivery of housing schemes in the borough and hence will reduce the supply of new affordable housing. This would be in direct conflict with LBW's objective to increase affordable housing provision via the proposed policy amendment.</p> <p>It is commonplace that proposals in Wandsworth are unable to accommodate a policy compliant provision of affordable housing. Indeed, viability was addressed in relation to the previous proposal at the York Road site and it was not possible to accommodate the policy targets at that time. The combination of increased policy targets and worsened market conditions clearly indicates that a target of at least 50% affordable with and 75% social rented units is highly unlikely to be viable in most circumstances.</p> <p>Greater pressure on the viability of schemes through the imposition of these policy requirements would likely reduce the quantum of social rented units within schemes. The proposed amendments are therefore highly unlikely to be deliverable and indeed will have the opposite effect of discouraging new housing development.</p>	

Rep No.	Respondent Name	Comments	Officer's Response
		<p>OBJECTIONS</p> <p>Angle Property are supportive of the delivery of affordable housing. However, objections are raised to the proposed amendments to Policy LP23 at this Regulation 18 stage as follows:</p> <p>Objection 1: Soundness: The proposed amendments are not sound due to inconsistencies with the London Plan and the absence of a robust evidence base.</p> <p>Objection 2: Economic Viability: The proposed amendments will hinder the deliverability of sites for housing, including affordable housing, to meet objectives of the Development Plan.</p>	
120	Edward Ledwidge, Brooks Court Management Company	Same as above	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs (including housing trajectory) and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council will consider the policy's relationship with the London Plan and the</p>

Rep No.	Respondent Name	Comments	Officer's Response
			<p>NPPF. The Council will be working with the GLA and other bodies to ensure that the policy is in conformity with other planning documents and guidelines and is justifiable and evidenced.</p>
121	<p>Edward Ledwidge, Owners of No.2, 3, 4, 5, 6, 7, 8, 9 and 10 Brooks Court</p>	<p>Same as above</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs (including housing trajectory) and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council will consider the policy's relationship with the London Plan and the NPPF. The Council will be working with the GLA and other bodies to ensure that the policy is in conformity with other planning</p>

Rep No.	Respondent Name	Comments	Officer's Response
			documents and guidelines and is justifiable and evidenced.
122	Edward Ledwidge, Montagu Evans obo Angle Property (York Road) Ltd	<p>4. Strongly Disagree</p> <p>5. Please see supporting statement.</p> <p>6. Strongly Disagree</p> <p>7. Please see supporting statement.</p> <p>8. Strongly Disagree</p> <p>9. Please see supporting statement.</p> <p>We write on behalf of our client, Angle Property (York Road) Limited, in response to the London Borough of Wandsworth's (hereafter referred to as 'LBW') Partial Review of their Local Plan, specifically the Council's proposed amendments to Policy LP23 (Affordable Housing).</p> <p>The LBW adopted their Local Plan in July 2023 following extensive engagement on the preparation of the Plan, which commenced in December 2018, and included an Examination in Public of the draft Local Plan in November 2022. The adopted Wandsworth Local Plan (2023-2038) sets out the Council's 15 year strategic vision, objectives, and spatial strategy to guide development. This includes Policy LP23 (Affordable Housing), which identifies the Council's required affordable housing target for the Borough. Policy LP23 states that:</p> <p>A. " The Council will seek to maximise the delivery of affordable housing in accordance with the London Plan which will contribute to securing the Mayor's strategic target of 50% of all new homes to be affordable.</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs (including housing trajectory) and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council will consider the policy's relationship with the London Plan and the NPPF. The Council will be working with the GLA and other bodies to ensure that the policy is in conformity with other planning documents and guidelines and is justifiable and evidenced.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>B. Development that creates 10 or more dwellings (gross) on individual sites must provide affordable housing on site's in accordance with the threshold approach set out in London Plan Policy H5.</p> <p>C. The Council will require an affordable housing tenure split of at least 50% low-cost rent products with a balance other intermediate products....”</p> <p>This Partial Review of the Local Plan seeks views from the local community alongside key stakeholders and developers on the proposed amendments to Policy LP23 (Affordable Housing) which includes the following:</p> <p>a) Strengthening the Local Plan policy by setting out a clear policy requirement for new housing developments in the borough to provide at least 50 per cent of dwellings as affordable homes delivered on site.</p> <p>b) Requiring a greater proportion of all new affordable homes to be genuinely affordable, preferably a 70/30 split in favour of social rent.</p> <p>c) Requiring an affordable housing from small sites below the current threshold of 10 or more homes (gross).</p> <p>ANGLE PROPERTY'S INVOLVEMENT IN LONDON BOROUGH OF WANDSWORTH</p> <p>Angle Property are the owners of the Shell Savoy Petrol Filling Station, 262 York Road, Wandsworth SW18 1TP.</p> <p>It is intended that the site will be redeveloped for mixed use purposes in the early part of the current plan period. Planning permission has previously been granted for the following:</p> <p>“Demolition of the existing buildings and structures and the erection of a ground plus 8-storey building to provide a 185 sq m commercial unit (Class A1, A2 and/or B1) and 31 space car park on the ground floor with 89 flats above along with</p>	

Rep No.	Respondent Name	Comments	Officer's Response
		<p>related access/servicing areas and basement plant/cycle stores" (LPA Ref:2016/5329)</p> <p>The approved scheme comprises 89 flats for rent. Further to viability testing this included provision of 18 units at a discounted market rent comprising 20% intermediate affordable housing.</p> <p>This proposition has not been brought forward due to constraints imposed by the existing lease. However, discussions are ongoing and it is envisaged that discussions with LBW regard a revised development proposal will be progressed shortly.</p> <p>The proposals are likely to include mixed commercial uses at ground floor and a living accommodation on upper floors. However, options for commercial development are also being explored.</p> <p>COMMENTARY ON PROPOSED AMENDMENTS</p> <p>Angle Property are committed to delivering affordable housing where feasible and work proactively with Councils to ensure that the maximum viable quantum of affordable housing is brought forward.</p> <p>Whilst supportive of the delivery of affordable housing in principle the following concerns are raised with regard to the proposed amendments to Policy LP23 of the Local Plan:</p> <ul style="list-style-type: none"> • Conflict with regional policy requirements. • Insufficient evidence to support the proposed amendments to policy; • The impact of proposed changes on regeneration of sites to deliver housing; • The impact of the proposed changes on the delivery of affordable housing; <p>and</p>	

Rep No.	Respondent Name	Comments	Officer's Response
		<p>Each of these are discussed in further detail below.</p> <p>CONFLICT WITH LONDON PLAN POLICY REQUIREMENTS</p> <p>Adopted Policy LP23 (Affordable Housing), whilst acknowledging the London Plan strategic target of 50% of homes to be affordable across London, requires under part B of the Policy that affordable housing is to be delivered in accordance with the thresholds set out within Policy H5 (Threshold approach to applications) of the London Plan. Policy H5 of the London Plan states that the threshold level of affordable housing on gross residential development is initially set at:</p> <ol style="list-style-type: none"> 1) A minimum of 35%; or 2) 50 per cent for public sector land where there is no portfolio agreement with the Mayor; or 3) 50 per cent for Strategic Industrial Locations, Locally Significant Industrial Sites and Non-Designated Industrial Sites appropriate for residential uses in accordance with Policy E7 Industrial intensification, co-location, and substitution where the scheme would result in a net loss of industrial capacity. <p>Adopted Policy LP23 therefore accords with the London Plan requirements and enables schemes to follow the fast track threshold requirements.</p> <p>The partial review of LB23 proposes a blanket requirement that all development would need to deliver 50% affordable housing on Site then this would give rise to a policy conflict between the London Plan. The Greater London Authority Act 1999 requires Local Plan to be in 'general conformity' with the London Plan, as such the Local Plan should align with the London Plan unless there is local evidence and circumstances which would justify a different approach. Whilst the requirement for 50% affordable housing on the Site accords with the Mayor's strategic affordable housing target for London, requiring all development to deliver 50% affordable housing (negating the Fast Track Route) would be in conflict with</p>	

Rep No.	Respondent Name	Comments	Officer's Response
		<p>the London Plan and evidence has not been provided to demonstrate the local need for this.</p> <p>LACK OF VIABILITY EVIDENCE TO SUPPORT THE REVISED POLICY</p> <p>Paragraph 31 of the National Planning Policy Framework (NPPF) (2023) requires the preparation and review of all policies to be underpinned by relevant and up to date evidence. This evidence should be adequate, proportionate and focused on supporting and justifying the policies concerned, considering relevant market signals. In line with the NPPF therefore, the LBW is required to demonstrate how emerging policies are underpinned with up-to-date evidence. It is noted however that no evidence has been provided as part of this Local Plan Partial Review consultation.</p> <p>The Regulation 19 Local Plan Viability Study undertaken in January 2022 supported Policy LP23 as it was necessary to test impact on the delivery of the Development Plan objectives. This included sensitivity testing scenarios concerning the delivery of a 60/40 tenure split (60% social rent, 25% First Homes and 15% other intermediate products) and a 70/30 tenure split (70% social rent, 25% First Homes and 5% other intermediate products) both of which were found to place risk on the Local Plan's delivery and as such, the provision of a 50/50 tenure mix was pursued (Page 29).</p> <p>The absence of a robust evidence base brings into question the soundness of the proposed amendment. This is particularly the case as market conditions have significantly worsened since 2022 and this is having a significant impact on delivery. We respectfully request clarification from the LBW on this matter.</p> <p>THE IMPACT OF THE PROPOSED CHANGES ON THE DELIVERY OF HOUSING</p>	

Rep No.	Respondent Name	Comments	Officer's Response
		<p>The delivery of new residential accommodation is a national, regional, and local priority. The current market conditions pose a number of challenges for developers which has resulted in schemes having to work harder to be viable and therefore deliverable.</p> <p>Housing delivery is a key objective of the NPPF which advocates that a sufficient amount and variety of land should come forward to significantly boost the supply of housing (paragraph 60).</p> <p>At a regional level, London Plan Policy H1 (Increasing Housing Supply) states that to ensure Local Planning Authorities achieve their ten year housing targets, boroughs should prepare delivery-focused development plans which allocate an appropriate range and number of sites that are suitable for residential and mixed-use development and intensification, encourage the development on other appropriate windfall sites and enable the delivery of housing capacity in identified Opportunity Areas. The Policy further states that Boroughs should also seek to optimise the potential for housing delivery on all suitable and available brownfield sites.</p> <p>At a local level, Policy SDS1 (Spatial Development Strategy 2023-2038) states that in the period of 2023-2028, 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 in accordance with the London Plan.</p> <p>Whilst the LBW can demonstrate a five year housing land supply at present, these targets are minimums and given the national, regional, and local priority for delivering housing, the delivery of sustainable and high quality residential developments should be encouraged.</p> <p>The proposed amendments to Policy LP23 would potentially undermine delivery of new housing sites within the Borough and therefore hinder the Council's ability to meet and exceed its minimum housing requirement of 1,950 new homes per</p>	

Rep No.	Respondent Name	Comments	Officer's Response
		<p>year. The proposed amendments would discourage landowners from bringing forward residential development on their sites due to an increased burden that would impact viability.</p> <p>The current market conditions are already resulting in deliverability challenges and additional policy burdens will result in even fewer sites coming forward for development. Paragraph 68 of the NPPF requires local planning authorities to ensure that planning policies identify a sufficient supply and mix of sites taking into account their availability, suitability, and economic viability.</p> <p>It is clear, therefore, that the introduction of the proposed amendments to Policy LP23 without a robust evidence base would impact economic viability and hence conflict with the requirements of Paragraph 68.</p> <p>THE IMPACT OF THE PROPOSED CHANGES ON THE DELIVERY OF AFFORDABLE HOUSING</p> <p>The proposed amendments to Policy LP23 is likely to impact delivery of housing schemes in the borough and hence will reduce the supply of new affordable housing. This would be in direct conflict with LBW's objective to increase affordable housing provision via the proposed policy amendment.</p> <p>It is commonplace that proposals in Wandsworth are unable to accommodate a policy compliant provision of affordable housing. Indeed, viability was addressed in relation to the previous proposal at the York Road site and it was not possible to accommodate the policy targets at that time. The combination of increased policy targets and worsened market conditions clearly indicates that a target of at least 50% affordable with and 75% social rented units is highly unlikely to be viable in most circumstances.</p> <p>Greater pressure on the viability of schemes through the imposition of these policy requirements would likely reduce the quantum of social rented units within</p>	

Rep No.	Respondent Name	Comments	Officer's Response
		<p>schemes. The proposed amendments are therefore highly unlikely to be deliverable and indeed will have the opposite effect of discouraging new housing development.</p> <p>OBJECTIONS</p> <p>Angle Property are supportive of the delivery of affordable housing. However, objections are raised to the proposed amendments to Policy LP23 at this Regulation 18 stage as follows:</p> <p>Objection 1: Soundness: The proposed amendments are not sound due to inconsistencies with the London Plan and the absence of a robust evidence base.</p> <p>Objection 2: Economic Viability: The proposed amendments will hinder the deliverability of sites for housing, including affordable housing, to meet objectives of the Development Plan.</p>	
123	Edward Ledwidge, Montagu Evans obo Brooks Court management Company	See above	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs (including housing trajectory) and will seek to find a balance that meets the aspirations of the</p>

Rep No.	Respondent Name	Comments	Officer's Response
			<p>Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council will consider the policy's relationship with the London Plan and the NPPF. The Council will be working with the GLA and other bodies to ensure that the policy is in conformity with other planning documents and guidelines and is justifiable and evidenced.</p>
124	Edward Ledwidge, Montagu Evans obo Owners of No 2, No 3, No 4, No 5, No 6 & 7, No 9 & 10 Brooks Court	See above	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs (including housing trajectory) and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p>

Rep No.	Respondent Name	Comments	Officer's Response
			<p>The Council will consider the policy's relationship with the London Plan and the NPPF. The Council will be working with the GLA and other bodies to ensure that the policy is in conformity with other planning documents and guidelines and is justifiable and evidenced.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>
125	James Lloyd	<p>4, Strongly disagree</p> <p>5. • Implementing Affordable Housing will substantially delay the decision period due to the negotiation period with legals, currently we enjoy decisions in 8-12 weeks but this could increase to 70 weeks. The Planning Inspector who forced Lambeth to drop their Affordable Housing contributions for under 10 units which they were going to implement in their Sept 2021 Local Plan stated taking a sample of 60 schemes for minor developments the decision period took an average of 71 weeks due to the negotiation process of Affordable Homes Contributions. Example where this is currently happening is Southwark Council with over 100 small site schemes currently sitting in limbo awaiting their Affordable sites to be sorted out. • Above will only clog up the Planning system further which still hasn't recovered to the standard assessment period of 8 weeks we enjoyed pre-covid. • Financial viability; holding costs of land at present is unsustainable with interest rates at a 15 year high, on a £1 million property which is pretty standard in Wandsworth developers are easily paying £12K month in interest waiting for a planning decision, if this increases from an average of 12</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>weeks to a possible of 70 weeks this alone will make development in the borough unsustainable. • Financial viability; costs of achieving planning permission has risen sharply recently due to stricter sustainability and biodiversity policies implemented. All developments now need to include green/brown roofs, air/ground source heat pumps, photovoltaics, enhanced building insulation, the associated costs of installing all these measures has pushed up building costs considerably on top of the increased material/labour costs since Brexit/Covid. •</p> <p>If it becomes too expensive for developers to develop in Wandsworth the derelict/run down sites dotted around the borough will not get developed and regenerated which will have a knock on effect on the surrounding street scene and in five years' time Wandsworth will look a very different borough from today with many rundown/derelict buildings/sites around the borough that are not financially viable to regenerate. • Simple maths; if developers stop building properties in Wandsworth as it's no longer sustainable/viable there will be less supply, therefore forcing up rental/purchase prices – the exact opposite of what this policy implementation is trying to achieve.</p> <p>6. Strongly disagree</p> <p>7. Please see comments above</p> <p>8. Strongly disagree</p> <p>9. Please see comments above</p> <p>10. • Implementing Affordable Housing will substantially delay the decision period due to the negotiation period with legals, currently we enjoy decisions in 8-12 weeks but this could increase to 70 weeks. The Planning Inspector who forced Lambeth to drop their Affordable Housing contributions for under 10 units which they were going to implement in their Sept 2021 Local Plan stated taking a sample of 60 schemes for minor developments the decision period took an average of 71 weeks due to the negotiation process of Affordable Homes</p>	<p>expectations of those engaging with the planning system.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>Contributions. Example where this is currently happening is Southwark Council with over 100 small site schemes currently sitting in limbo awaiting their Affordable sites to be sorted out.</p> <ul style="list-style-type: none"> • Above will only clog up the Planning system further which still hasn't recovered to the standard assessment period of 8 weeks we enjoyed pre-covid. • Financial viability; holding costs of land at present is unsustainable with interest rates at a 15 year high, on a £1 million property which is pretty standard in Wandsworth developers are easily paying £12K month in interest waiting for a planning decision, if this increases from an average of 12 weeks to a possible of 70 weeks this alone will make development in the borough unsustainable. • Financial viability; costs of achieving planning permission has risen sharply recently due to stricter sustainability and biodiversity policies implemented. All developments now need to include green/brown roofs, air/ground source heat pumps, photovoltaics, enhanced building insulation, the associated costs of installing all these measures has pushed up building costs considerably on top of the increased material/labour costs since Brexit/Covid. • If it becomes too expensive for developers to develop in Wandsworth the derelict/run down sites dotted around the borough will not get developed and regenerated which will have a knock on effect on the surrounding street scene and in five years' time Wandsworth will look a very different borough from today with many rundown/derelict buildings/sites around the borough that are not financially viable to regenerate. • Simple maths; if developers stop building properties in Wandsworth as it's no longer sustainable/viable there will be less supply, therefore forcing up rental/purchase prices – the exact opposite of what this policy implementation is trying to achieve. 	
126	William Lock, Pin Projects Ltd.	<p>4. Strongly disagree</p> <p>5. National policy states that affordable housing should not be sought for schemes that don't qualify as major developments. The proposal for affordable housing on all sites is contrary to national policies MM11; 15; 157; and 160, the Secretary of State's letter dated March 2020, and Direction 3. Implementation of a similar</p>	<p>Comments noted.</p> <p>The Council will consider the policy's relationship with the London Plan and the NPPF. The Council will be working with the GLA and other bodies to ensure that the</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>scheme in Lambeth to mandate affordable housing on all sites regardless of the number of units, resulted in a significant increase in the time it took councils to determine cases. Negotiations on land values saw determination dates increase from 56 to 71 weeks. This level of delay is unviable for most small developers who rely on delivering schemes quickly to avoid protracted project timelines negatively effecting profits. Viability testing is proposed as aid to application of the new policy but this will likely just act as another cost that developers have to incur, and a further delay. Further to the timelines, the profit margins on small schemes have become increasingly tight in light of high build costs, weak resales and high debt prices. Being mandated to sell units below market value would make all schemes we have looked at in the last two years economically unviable. The imposition of this ruling would likely see us as a small developer no longer able to work in the Borough of Wandsworth. We actively seek derelict buildings, back field plots and large houses in disrepair to turn in to small family homes and flats. The new units are London Plan compliant, energy efficient and built to a high standard. They're a marked improvement on what we acquire on day one and significantly improve not only the building but the wider street scape. The London Plan highlights the role of small-scale development to help deliver the housing needs of the capital. Small sites are often more sympathetic and more interesting than the large scale schemes that will be left able to operate in the Borough. I strongly object to this proposal, feel it runs counter to national policies and the London Plan, and were it passed, suspect we would quickly strike conclude that the borough is not one we could operate in any longer.</p> <p>6. Strongly agree</p> <p>7. Affordable housing ensures that the borough is accessible to all, supports diversity, and ensures that many services providers are able to live and work in the borough.</p> <p>8. Strongly disagree</p>	<p>policy is in conformity with other planning documents and guidelines and is justifiable and evidenced.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		9. Please see my comments at question 6. This ruling would make the majority of small schemes unviable in the borough.	
127	Tony Loizou	<p>4. Strongly disagree</p> <p>5. By implementing the need for 50% affordable housing on smaller developments you will effectively make them unviable from a financial perspective and therefore put a stop to virtually all smaller developments.</p> <p>6. Strongly disagree</p> <p>7. As a developer a split of 70/30 in favour of anything that will be worth considerably less than market value will make such a development unviable financially, meaning development won't take place and there will be no housing delivered, affordable or otherwise.</p> <p>8. Strongly disagree</p> <p>9. Affordable housing on sites below 10units would be unviable, especially with increased financing costs along with all the green measures that are increasingly imposed on new development which are far more expensive than traditional means of heating etc.</p> <p>10. I think the way to achieve more affordable housing may potentially be by using section 106 and CIL payment's in a better way, along with more support from central government who after all have a responsibility to provide housing for people. The thing that local authorities need to understand is that developers such as myself are very keen to provide new homes, but we are not charities. The amount of stress and pressure that comes with borrowing large sums of money along with all the issues that generally arise whilst delivering property developments have to be balanced with end profit.</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>

Rep No.	Respondent Name	Comments	Officer's Response
128	Nick London	<p>I have read some of your literature but my question is a private developer is a private developer and should not have any regulations put on to them to provide social housing. Social housing should be provided by social institutions such as the Local Authority and Housing Associations.</p> <p>It should have no bearing on private developers who build and develop private housing. I believe Councils can borrow money themselves so why don't they borrow and build their own public and social housing, it should be kept separate from public sector housing</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes.</p>
129	Christopher Long, Long & Co	<p>4. Strongly disagree</p> <p>5. 50% too much.</p> <p>6. Disagree</p> <p>7. Too much</p> <p>8. Strongly disagree</p> <p>9. It will make new build developments and refurbishments less financially viable resulting in less housing. Also, Implementing Affordable Housing will substantially delay the decision period due to the negotiation period with legals, currently we enjoy decisions in 8-12 weeks but this could increase to 70 weeks.</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>

Rep No.	Respondent Name	Comments	Officer's Response
130	David M, RC Homes	<p>4. Strongly disagree.</p> <p>5. Unfortunately, this is completely unviable, it will slow down development and eventually lead to far less affordable homes being built.</p> <p>6. Neither agree or disagree.</p> <p>8. Strongly disagree.</p> <p>9. Quite simply, this will ruin development in Wandsworth borough. No sites will be bought forward for development, amount of affordable homes will DECREASE, planning will become as backlogged as other councils who have tried to implement this quite ludicrous and ill thought out policy (Southwark Council). If the objective is to stop development and run leave copious amounts of buildings undeveloped and uninhabitable then this policy will achieve that. Negotiating Affordable Home delivery Contributions creates enormous delays which results in no small sites being developed. Less revenue for the council and less delivery of actual affordable housing. Other councils have tried and failed to bring this policy into place which has resulted in every small developer refusing to work in said council now (Southwark). I cannot stress enough the impact this policy will have on any sort of development within the borough, wholeheartedly ashamed to be lead by labour council who we voted for when policies like this are introduced.</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p>
131	Alex Macaulay	<p>4. Strongly disagree</p> <p>5. This level of affordable housing provision makes almost all sites unviable for development</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>6. Agree</p> <p>7. There is a stronger need for affordable rent tenure</p> <p>8. Strongly disagree</p> <p>9. This level of affordable housing provision makes almost all sites unviable for development. It will prevent SME developers being able to operate in the borough and with a chronic shortage of housing that is unacceptable</p>	<p>testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>
132	Antonia MacDougall, Quod	<p>10. A Whole Plan Viability Study was prepared in January 2022 by Porter Planning Economics with Three Dragons to support the recently adopted Local Plan. The study was undertaken in 2021 with the final 2022 Viability Study evidencing most typologies were viable, but some typologies were not viable.</p> <p>Please can you share with us the updated Viability Study that has informed the Councils proposed amendments to provide a greater proportion of social rented homes and move from 50/50 to 70/30?</p>	<p>Comments noted.</p> <p>The Council will be seeking to update the January 2022 Porter Planning Economics report alongside an update of the Local Housing Needs Assessment, which will consider changes in the economy, and in housing need, in the intervening period.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p>
133	Soraya Maudarbocus	4. Strongly disagree	Comments noted.

Rep No.	Respondent Name	Comments	Officer's Response
		<p>5. It will no longer be viable for developers to build or convert as the cost of the build together with all other expenses involved will not reach the minimum profit that banks are looking to lend</p> <p>6. Disagree</p> <p>7. It is still too much to make smaller projects viable</p> <p>8. Strongly agree</p> <p>9. No-one will touch the smaller sites for redevelopment. Developers are not charities. It's a lot of headache and stress to be a developer.</p> <p>10. It is unfortunate that instead of encouraging to build more especially for smaller developers, the borough is looking to push them away. Big developers will not look at smaller sites so all the borough risk here is not to have any smaller development happening at all!</p>	<p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p>
134	Hugh Meddings	<p>4. Strongly disagree</p> <p>5. 50% too much</p> <p>6. Disagree</p> <p>7. Again too much</p> <p>8. Strongly disagree</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy on overall housing delivery of a range of</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>9. this will slow down all small developments & conversions, so will not achieve additional low cost units as they will be stuck in planning.oo</p>	<p>tenures in different scenarios, such as on small sites.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p>
135	Michael Mike	<p>4. Strongly disagree</p> <p>5. This choke the planning system, increase costs and reduce the amount of new housing stocks. Conclusion: Generations and generations will be priced out of the borough. BAD IDEA.</p> <p>6. Strongly disagree</p> <p>7. Too many legislations to comply with, houses are not being built in the numbers required to keep rents down. Where do you expect the funding to come from? Maybe Wandsworth council needs to set-up a funding division to see how these numbers work once you factor in bio diversity and all the green tech required. This idea will backfire, I get the impression people in Wandsworth do not understand the restraints of obtaining funding. This idea is in conflict with the banks criteria of funding developments.</p> <p>8. Disagree</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>9. Wandsworth need to fund sustainable housing, pushing this responsibility onto developers will make construction in Wandsworth fall off the cliff</p> <p>10. There is some good intentions here but this will unravel. Schemes like this need cooperation of funding institutions or new build development goes into reverse. Then you will have to bury your heads after realising that planning decisions become unsustainably costly, less rental unit availability. This will penalise heavily the renting population.</p> <p>Most of the times these surveys get bypassed anyway and the wrong decision get's made regardless.</p> <p>Many Thanks for your time</p>	<p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>
136	Nida Mohiyuddin	<p>4. Strongly agree</p> <p>5. With the housing crisis at a breaking point and thoybands of families being directly impacted more needs to be done to provide affordable housing and this is a step in the right direction</p> <p>6. Strongly agree</p> <p>7. I spoke at the Wandsworth town hall as king mps to do more for people in our community to enable them to stay living in wandsworth. We need more social housing</p> <p>8. Strongly agree</p> <p>9. I welcome all new initiatives for more affordable social housing</p>	<p>Support noted.</p>
137	James Moorhouse, JM Commercial Ltd	<p>4. Strongly agree</p> <p>5. It is an unreasonable ratio benchmark and will implode when private developers focus on different Boroughs and counties where the profit margins make</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>developing new housing stock viable. The impact of the policy will be that less housing will be constructed in the Borough. This is contrary to the government policy of providing more affordable and private housing. There has to be a better ratio for developers to bother building. They are not there to break even. They are running a business.</p> <p>6. Strongly agree</p> <p>7. For reasons given in previous section</p> <p>8. Strongly disagree</p> <p>9. For the reasons given in my first response. It is not viable commercially.</p> <p>10. The revised policy does not seem to be well thought through. The impact of tightening ratio will be a reduction in development and redevelopment projects in the borough. The net effect will be less house/flat building.</p> <p>Retain the current ratio provision as a fair balance.</p>	<p>testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>
138	Valerie Mowah, Merton Borough Council	<p>Merton fully supports Wandsworth's proposed objective to strengthen the Local Plan policy requirement as it is considered that this will help more effectively contribute towards addressing Wandsworth's identified local needs and the London Plan strategic target for 50% of all homes delivered across London to be genuinely affordable.</p> <p>It is noted that the London Plan 50% target is strategic and applies London-wide rather than to individual sites.</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>It would be helpful to be provided with details of the wording amendments Wandsworth consider appropriate and effective to strengthen Local Plan policy LP23 and other relevant policies to meet their proposed objective. If it is the intention that strengthening of Policy LP23 with require all new housing developments to provide at least 50% of dwellings as affordable homes on site, the Local Plan amendments should include clarification on how this will be expected to be delivered, and whether this requirement also applies to proposals which meet the threshold level for a minimum provision of 35% affordable housing provision to be eligible for the Fast Track Route as set out in the London Plan policy H5.</p> <p>Merton fully supports Wandsworth's objective for a greater proportion of all new affordable homes to be genuinely affordable, with a preferable split of 70:30 in favour of social rented. Merton's emerging new Local Plan sets out an identical approach which is informed and aimed at addressing identified local housing needs which demonstrates an overwhelming need for social rented homes. It is considered that this overwhelming need is replicated in neighbouring boroughs such as Wandsworth and London wide.</p> <p>Similarly, it would be helpful to be provided with details of the wording amendments Wandsworth consider appropriate and effective to strengthen Local Plan policy LP23 and other relevant policies to meet their proposed objective, to better understand and assess Wandsworth's proposed intention.</p> <p>Merton fully supports Wandsworth's objective to require affordable housing from small sites below the current threshold of 10 or more homes (gross). Merton's emerging new Local Plan sets out an identical approach, in recognition, given the identified overwhelming local needs and in recognition that 90% of planning applications for new homes in Merton come from sites of less than 10 homes. Again, it would be helpful to be provided with details of the wording amendments Wandsworth consider appropriate and Partial Review of Wandsworth's Local Plan</p>	<p>The Council will consider the policy's relationship with the threshold approach and London Plan policy. The Council will be working with the GLA and other bodies to ensure that the policy is in conformity with other planning documents and guidelines and is justifiable and evidenced.</p> <p>Policy wording and evidence base will be made available at the next stage of consultation which is Regulation 19.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>(Regulation 18) – Response Form Official effective to strengthen Local Plan policy LP23 and other relevant policies to meet their proposed objective, to better understand and assess Wandsworth's proposed intention.</p> <p>Robust local housing needs, viability and deliverability evidence will be important to inform, support and justify the proposed review and update of Policy LP23 (Affordable Housing) and other policies as they relate to strengthening provision of homes for social rent for local people</p>	
139	Liam Naldrett, Laurels	<p>4. Strongly disagree</p> <p>5. 50% is to much and will thus impact the values making smaller site unviable for resale, therefore lots of empty units and and stop to further building</p> <p>6. Disagree</p> <p>7. Will impact smaller schemes.</p> <p>8. Strongly disagree</p> <p>9. Again will impact the ability to sell the units, prices go down, developers won't build due to increased costs.</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p>

Rep No.	Respondent Name	Comments	Officer's Response
			The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.
140	Kim Neville	<p>4. Strongly agree</p> <p>6. Strongly agree</p> <p>7. Strongly agree</p>	Support noted.
141	Diana Ngobi, National Highways	We have no comments to make at this time. Please keep us updated on your progress.	No response required.
142	Rupert Nicholson, Rampton Baseley	<p>4. Strongly disagree</p> <p>5. 50% split of affordable housing is too much for development sites. The impact will have a negative affect and even less properties will be built as a result, private and affordable</p> <p>6. Disagree</p> <p>7. 50% split of affordable housing is too much for development sites. The impact will have a negative affect and even less properties will be built as a result, private and affordable</p> <p>8. Strongly disagree</p> <p>9. Implementing Affordable Housing will substantially delay the decision period due to the negotiation period with legals, currently we enjoy decisions in 8-12 weeks but this could increase to 70 weeks. The Planning Inspector who forced Lambeth to drop their Affordable Housing contributions for under 10 units which they were going to implement in their Sept 2021 Local Plan stated taking a</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>sample of 60 schemes for minor developments the decision period took an average of 71 weeks due to the negotiation process of Affordable Homes Contributions. Example where this is currently happening is Southwark Council with over 100 small site schemes currently sitting in limbo awaiting their Affordable sites to be sorted out. Above will only clog up the Planning system further which still hasn't recovered to the standard assessment period of 8 weeks we enjoyed pre-covid. Financial viability; holding costs of land at present is unsustainable with interest rates at a 15 year high, on a £1 million property which is pretty standard in Wandsworth developers are easily paying £12K month in interest waiting for a planning decision, if this increases from an average of 12 weeks to a possible of 70 weeks this alone will make development in the borough unsustainable. Financial viability; costs of achieving planning permission has risen sharply recently due to stricter sustainability and biodiversity policies implemented. All developments now need to include green/brown roofs, air/ground source heat pumps, photovoltaics, enhanced building insulation, the associated costs of installing all these measures has pushed up building costs considerably on top of the increased material/labour costs since Brexit/Covid. If it becomes too expensive for developers to develop in Wandsworth the derelict/run down sites dotted around the borough will not get developed and regenerated which will have a knock on effect on the surrounding street scene and in five years' time Wandsworth will look a very different borough from today with many rundown/derelict buildings/sites around the borough that are not financially viable to regenerate. Simple maths; if developers stop building properties in Wandsworth as it's no longer sustainable/viable there will be less supply, therefore forcing up rental/purchase prices – the exact opposite of what this policy implementation is trying to achieve.</p>	<p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>
143	Andrew Nissim	<p>I wish to object to the proposal regarding 'affordable housing'. The proposal to demand each private unit to also have an 'affordable' unit is ill-conceived. The result of this proposal will result in less 'affordable' accommodation being available in the Borough.</p>	<p>Comments noted. The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>It is likely that developments will not be financially viable, particularly for the smaller property developers.</p> <p>The burden of providing 'affordable' housing should be the responsibility of the Local Authority.</p> <p>Passing the responsibility onto developers will be counterproductive.</p> <p>The proposal ultimately results in the first-time buyers of the 'normal' accommodation suffering a higher cost in subsidising the Local Authorities neglect in taking responsibility. Developers/builders particularly small developers/builders should be encouraged to provide housing. Adding further pressure will not be beneficial to the shortage of modern well-built accommodation being provided within Wandsworth.</p> <p>Property developers/builders run a business and employ people and add to the general economy.</p> <p>There are people in Wandsworth, and all areas, that are suffering from lack of affordable food, yet you do not request that the major food retailers sell cheaper food to them! Wouldn't the equivalent be asking Tesco/Sainsburys etc to sell each alternative food basket at a reduced rate.</p> <p>Take responsibility for your own constituents and provide 'affordable' housing through normal business acumen, not penalise builders.</p>	<p>Council will be seeking to ensure that the policy is justified and viable and will not have a negative impact on the provision of other tenures.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p>
144	Jack Norton	<p>4. Strongly disagree</p> <p>5. You will kill development and make the planning process even harder</p> <p>6. Strongly disagree</p> <p>7. You will kill development and make the planning process even harder</p> <p>8. Strongly disagree</p> <p>9. You will kill development</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial</p>

Rep No.	Respondent Name	Comments	Officer's Response
			<p>viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>
145	Barry O'Donnell	<p>4. Strongly disagree</p> <p>5. You will kill any financial viability and hence kill supply of desperately needed units</p> <p>6. Strongly disagree</p> <p>7. The statement beggars no understanding of viability</p> <p>8. Strongly disagree</p> <p>9. As kills viability. Council can build whatever percentage they want in council land but trying to do this in private land where developers have to generate a profit is simply misguided</p> <p>10. This is a misguided effort by council to increase supply but guaranteed will have the opposite effect.</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>
146	Elizabeth Oddono, Oddono's	<p>4. Strongly agree</p> <p>5. Housing issues cause distress and health problems to many families</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>6. Strongly agree</p> <p>7. Decades of ignoring affordable housing needs reversing</p> <p>8. Neither agree or disagree</p> <p>9. Did not understand</p>	
147	Rizwan Osman	<p>4. Strongly disagree</p> <p>5. This is too much and unrealistic</p> <p>6. Strongly disagree</p> <p>7. This is too much and unrealistic</p> <p>8. Strongly disagree</p> <p>9. This will make it not viable for developers to provide housing in the Borough</p> <p>10. I am a developer in the Borough and I strongly oppose plans to bring in Affordable Housing for small sites. This would mean almost all projects would not be financially viable, thus meaning the Borough will suffer with lack of new housing. Furthermore I do not understand the logic behind this as it will create for more work for a planning system which is already severely overworked. Almost all applications will be delayed as your affordable housing department will get in to unnecessary protracted talks with applicants for cases</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and</p>

Rep No.	Respondent Name	Comments	Officer's Response
			delay in the planning application process and accelerate the delivery of housing.
148	Adem Ozturk	<p>4. Strongly disagree</p> <p>5. 50% too much</p> <p>6. Disagree</p> <p>7. Again too much</p> <p>8. Strongly disagree</p> <p>9. Lowering the threshold for affordable housing requirements in Wandsworth, such that one unit in every house conversion to two flats must be affordable, will likely drive investors to other boroughs without these constraints. This could lead to a decrease in development within Wandsworth, which is counterproductive given the acute need for more housing in the area. The removal of the 9 unit threshold and the decision to stop accepting affordable housing contributions are critical factors that could significantly impede local development efforts.</p> <p>10. Lowering the threshold for affordable housing requirements in Wandsworth, such that one unit in every house conversion to two flats must be affordable, will likely drive investors to other boroughs without these constraints. This could lead to a decrease in development within Wandsworth, which is counterproductive given the acute need for more housing in the area. The removal of the 9 unit threshold and the decision to stop accepting affordable housing contributions are critical factors that could significantly impede local development efforts.</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>
149	Katie Parsons, Historic England	Thank you for the opportunity to comment on the above consultation. As the Government's adviser on the historic environment, Historic England is keen to ensure that the conservation and enhancement of the historic environment is	No response required.

Rep No.	Respondent Name	Comments	Officer's Response
		<p>taken fully into account at all stages and levels of the Local Plan process.</p> <p>This partial review focuses solely on Policy LP23 (Affordable Housing) and other policies which relate to strengthening provision of homes for social rent. The Regulation 18 is very high-level, and the proposed scope does not appear to have any implications for the historic environment. If any specific heritage issues arise as a result of the consultation, please not hesitate to contact us. We would also like to be consulted again at Regulation 19 stage, by which time more detail should be published, and we will be in a position to reassess the proposals in case any heritage issue do develop.</p> <p>It should be noted that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially Object to any specific development proposal which may subsequently arise from these documents, and which may have adverse effects on the environment.</p>	
150	Sachin Patel	<p>4. Strongly agree.</p> <p>6. Agree.</p> <p>8. Strongly disagree.</p> <p>10. 50% affordable on small sites under 11 units will just result in less housing. affordable housing needs to be focused on larger developments.</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and</p>

Rep No.	Respondent Name	Comments	Officer's Response
			delay in the planning application process and accelerate the delivery of housing.
151	Jitendra Patel, Colby Developments	<p>4. Strongly disagree</p> <p>5. This will make project unviable under 9 units and result in lower supply of accommodation in the borough defeating the main reason for changing the policy th</p> <p>6. Strongly disagree</p> <p>7. Should leave it to private sector to decide otherwise supply will suffer</p> <p>8. Strongly disagree</p> <p>9. Deveopments will become unviable</p> <p>10. The government tried to make changes to the rental reform and quickly realised the impact that was having to the supply of rental accommodation even before the rental reforms were put in place. Same will happen with the the proposals</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p>
152	Nilesh Patel, Urban RESI Ltd	<p>4. Strongly disagree</p> <p>5. It is theoretically a nice idea but it would be disastrous if implemented on small development site. Small developer like us are converting housing into new flats and this entire segment of the market would die. Developments over a certain size should be required to provide affordable homes otherwise there is no incentive whatsoever to develop in the borough. Property prices are very high, as are labour and material prices so there is no margin to make a development of say 6 flats 50% affordable. The proposed policy should be amended and be tiered based on number of end unit being created. For example there should be no requirement for the first 10 units then 20% for additional units up to 30 units and</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy on overall housing delivery of a range of</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>then additional units beyond this at 50%. This protects the small and medium size developers who are not getting the same economies of scale as the big corporate developers. I would love to discuss this further with you and get involved in the consultation as it is important small developers are being heard.</p> <p>6. Strongly disagree</p> <p>7. I don't think blanket rules can be applied to a free market. If such requirements exist then they must be again tiered and proportionate to the target areas and demographic.</p> <p>8. Strongly disagree</p> <p>9. As per my answer to question 6</p>	<p>tenures in different scenarios, such as on small sites.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>
153	Raj Patel	<p>4. Strongly disagree</p> <p>5. 50% is too too much</p> <p>6. Disagree</p> <p>7. again too much</p> <p>8. Strongly disagree</p> <p>9. Chasing away developers not good for borough and renovation of the area</p> <p>10. How can you even propose this it will cripple the local economy.</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>
154	Lara Paya Morant	<p>4. Strongly agree</p> <p>6. Strongly agree</p>	Support noted.

Rep No.	Respondent Name	Comments	Officer's Response
		8. Strongly agree	
155	Dmitro Peca, A7 Properties Management Ltd	<p>4. Strongly disagree</p> <p>5. 50% too much</p> <p>6. Disagree</p> <p>7. 70% too much</p> <p>8. Strongly disagree</p> <p>9. If the proposed standards are approved, this will have an extremely negative impact on the development sector and real estate. And subsequently, this will also negatively affect the development of the area and give the opposite effect to the desired one.</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>
156	Jeremy Phillips, Waverley Building Services Ltd	<p>4. Strongly disagree</p> <p>5. 50% is too much and will make pretty much every development scheme unviable so Wandsworth will be left with its existing housing stock when there is an acute need for an intensification of existing housing stock and development of brownfield sites.</p> <p>6. Strongly disagree</p> <p>7. Increasing the burden of affordable homes will act as a disincentive to produce more homes. The only way to really make homes affordable is to allow developers to build more than the demand.</p> <p>8. Strongly disagree</p> <p>9. This will disincentivise the conversion of existing large homes and will result in the loss of homes in Wandsworth.</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>10. The government and the council is looking at things from entirely the wrong side. All the extra costs you are piling onto developers (CIL, Affordable homes, 50 different reports that are duplicated in hundreds of applications) all act as disincentives to build new homes. Instead of putting in place measures which will reduce housebuilding you should be encouraging more housebuilding and buying some of the resulting stock from developers rather than paying for B&Bs and hotels.</p>	<p>expectations of those engaging with the planning system.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>
157	<p>Nick Philo, Ortillia Developmnets Ltd.</p>	<p>4. Strongly disagree.</p> <p>5. Increasing the affordable provision to 50% would make any development that our company focuses on financially unviable</p> <p>6. Neither agree or disagree.</p> <p>8. Strongly disagree.</p> <p>9. We run our development company to make profit. Whist we focus on creating beautiful properties which are sustainable, elegant and timeless a key priority is profit. With the introduction of CIL, stamp duty increases and the current cost of construction an affordable provision on any developments under a threshold of 10 units would make these smaller developments unviable. If this was introduced we would no longer be able to carry out any further developments in Wandsworth. This would be similar to our competitors who focus on smaller developments (1 - 10 units). Whist the idea is good in principal it has obviously not been considered with any input from Quantity Surveyors or Cost Managers who have a detailed understanding of property development costs otherwise it wouldn't have been tabled let alone approved by Wandsworth Council. It's a real shame because it's been put forward with a total lack of understanding of the realities of property development in Wandsworth and Central London today. If this continues Wandsworth will be left with lots of derelict sites within the borough, which will</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		devalue the area, give rise to potential environmental problems and have an negative overall impact.	
158	Cyrus Pirani	<p>4. Strongly disagree</p> <p>5. 50% Affordable Housing Requirement is too high</p> <p>6. Strongly disagree</p> <p>7. 70% Social Rent is too high</p> <p>8. Disagree</p> <p>9. Unlikely to be financially feasible and will only serve to increase costs for small developments</p> <p>10. By introducing tougher requirement on smaller developments it is likely the number of those developments will reduce/cease thereby reducing overall supply and driving up rents contrary to the objective of the proposal.</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>
159	Tom Prowse	<p>4. Strongly disagree</p> <p>5. 50% is too much</p> <p>6. Disagree</p> <p>7. Too much</p> <p>8. Strongly disagree</p> <p>9. • Implementing Affordable Housing will substantially delay the decision period due to the negotiation period with legals, currently we enjoy decisions in 8-12 weeks but this could increase to 70 weeks. The Planning Inspector who forced Lambeth to drop their Affordable Housing contributions for under 10 units</p>	<p>Comments noted.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>which they were going to implement in their Sept 2021 Local Plan stated taking a sample of 60 schemes for minor developments the decision period took an average of 71 weeks due to the negotiation process of Affordable Homes Contributions. Example where this is currently happening is Southwark Council with over 100 small site schemes currently sitting in limbo awaiting their Affordable sites to be sorted out.</p> <ul style="list-style-type: none"> • Above will only clog up the Planning system further which still hasn't recovered to the standard assessment period of 8 weeks we enjoyed pre-covid. • Financial viability; holding costs of land at present is unsustainable with interest rates at a 15 year high, on a £1 million property which is pretty standard in Wandsworth developers are easily paying £12K month in interest waiting for a planning decision, if this increases from an average of 12 weeks to a possible of 70 weeks this alone will make development in the borough unsustainable. • Financial viability; costs of achieving planning permission has risen sharply recently due to stricter sustainability and biodiversity policies implemented. All developments now need to include green/brown roofs, air/ground source heat pumps, photovoltaics, enhanced building insulation, the associated costs of installing all these measures has pushed up building costs considerably on top of the increased material/labour costs since Brexit/Covid. • If it becomes too expensive for developers to develop in Wandsworth the derelict/run down sites dotted around the borough will not get developed and regenerated which will have a knock on effect on the surrounding street scene and in five years' time Wandsworth will look a very different borough from today with many rundown/derelict buildings/sites around the borough that are not financially viable to regenerate. • Simple maths; if developers stop building properties in Wandsworth as it's no longer sustainable/viable there will be less supply, therefore forcing up rental/purchase prices – the exact opposite of what this policy implementation is trying to achieve. 	<p>delay in the planning application process and accelerate the delivery of housing.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>10. • Implementing Affordable Housing will substantially delay the decision period due to the negotiation period with legals, currently we enjoy decisions in 8-12 weeks but this could increase to 70 weeks.</p> <p>The Planning Inspector who forced Lambeth to drop their Affordable Housing contributions for under 10 units which they were going to implement in their Sept 2021 Local Plan stated taking a sample of 60 schemes for minor developments the decision period took an average of 71 weeks due to the negotiation process of Affordable Homes Contributions.</p> <p>Example where this is currently happening is Southwark Council with over 100 small site schemes currently sitting in limbo awaiting their Affordable sites to be sorted out.</p> <ul style="list-style-type: none"> • Above will only clog up the Planning system further which still hasn't recovered to the standard assessment period of 8 weeks we enjoyed pre-covid. • Financial viability; holding costs of land at present is unsustainable with interest rates at a 15 year high, on a £1 million property which is pretty standard in Wandsworth developers are easily paying £12K month in interest waiting for a planning decision, if this increases from an average of 12 weeks to a possible of 70 weeks this alone will make development in the borough unsustainable. • Financial viability; costs of achieving planning permission has risen sharply recently due to stricter sustainability and biodiversity policies implemented. All developments now need to include green/brown roofs, air/ground source heat pumps, photovoltaics, enhanced building insulation, the associated costs of installing all these measures has pushed up building costs considerably on top of the increased material/labour costs since Brexit/Covid. • If it becomes too expensive for developers to develop in Wandsworth the derelict/run down sites dotted around the borough will not get developed and 	

Rep No.	Respondent Name	Comments	Officer's Response
		<p>regenerated which will have a knock on effect on the surrounding street scene and in five years' time Wandsworth will look a very different borough from today with many rundown/derelict buildings/sites around the borough that are not financially viable to regenerate.</p> <ul style="list-style-type: none"> Simple maths; if developers stop building properties in Wandsworth as it's no longer sustainable/viable there will be less supply, therefore forcing up rental/purchase prices – the exact opposite of what this policy implementation is trying to achieve. 	
160	<p>Joe Purcell, Revive Planning and Renovations Ltd.</p>	<p>4. Strongly agree.</p> <p>5. Regulation 18 Statement</p> <p>6. Strongly disagree.</p> <p>7. Regulation 18 Statement</p> <p>8. Strongly disagree.</p> <p>9. Regulation 18 Statement</p> <p>10. Cllr Aydin Dinkerdem states that many developers only build 9 units to avoid providing affordable homes. I've had a look at planning history for the number of 9 unit schemes that have been approved over the last 5 years between 14/11/2018 and 14/11/2013 and of the approximate 17,500 applications that have been decided in that time I can only find 8 nine-unit schemes that have been approved in the same period of time.</p> <p>As well as increase in CIL and Sustainability Contributions developers have suffered huge increases in costs externally including huge increases in borrowing rates, materials and labour whilst at the same time property values within the borough have fallen, I think this will just be a final tax too far which will kill off</p>	<p>Comments noted.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council will be seeking to update the January 2022 Porter Planning Economics report alongside an update of the Local Housing Needs Assessment, which will consider changes in the economy, and in housing need, in the intervening period.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>development of small sites within the borough and developers will simply move to other boroughs.</p> <p>This will lead to numerous small sites around the borough being financially unviable to develop, when these small sites are developed the aesthetic quality of the building/street scene and environment they are located in are usually significantly improved - now they will just sit there a mess, redundant having detrimental impact on the aesthetic quality of the street scene and the environmental quality of the borough.</p> <p>By all means the borough requires more affordable housing but this needs to fall on the shoulders of the larger developers who for some reason get away with providing miniscule amounts of affordable housing or financial contributions due to the expensive barristers they can afford to pay to justify the under payments/deliveries.</p> <p>This is so short sighted of the Labour Council; instead of concentrating their efforts on getting the required Affordable Housing out of the big developers instead they want to drive the little developers out of the borough.</p> <p>Since Labour came to power on the 05/05/2022 are you able to inform us from all the developments of over 10 units that have been approved in that time, the total number of market units approved compared to total number of affordable units approved? If you could email me that I would be very interested.</p>	<p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>Information on all developments approved is publicly available and can be found on The Councils monitoring webpage.</p>
161	Tina Purcell, Heritage Applications	<p>4. Strongly disagree</p> <p>5. • Implementing Affordable Housing will substantially delay the decision period due to the negotiation period with legals, currently we enjoy decisions in 8-12 weeks but this could increase to 70 weeks. The Planning Inspector who forced Lambeth to drop their Affordable Housing contributions for under 10 units which they were going to implement in their Sept 2021 Local Plan stated taking a sample of 60 schemes for minor developments the decision period took an</p>	<p>Comments noted.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>average of 71 weeks due to the negotiation process of Affordable Homes Contributions. Example where this is currently happening is Southwark Council with over 100 small site schemes currently sitting in limbo awaiting their Affordable sites to be sorted out.</p> <ul style="list-style-type: none"> • Above will only clog up the Planning system further which still hasn't recovered to the standard assessment period of 8 weeks we enjoyed pre-covid. • Financial viability; holding costs of land at present is unsustainable with interest rates at a 15 year high, on a £1 million property which is pretty standard in Wandsworth developers are easily paying £12K month in interest waiting for a planning decision, if this increases from an average of 12 weeks to a possible of 70 weeks this alone will make development in the borough unsustainable. • Financial viability; costs of achieving planning permission has risen sharply recently due to stricter sustainability and biodiversity policies implemented. All developments now need to include green/brown roofs, air/ground source heat pumps, photovoltaics, enhanced building insulation, the associated costs of installing all these measures has pushed up building costs considerably on top of the increased material/labour costs since Brexit/Covid. • If it becomes too expensive for developers to develop in Wandsworth the derelict/run down sites dotted around the borough will not get developed and regenerated which will have a knock on effect on the surrounding street scene and in five years' time Wandsworth will look a very different borough from today with many rundown/derelict buildings/sites around the borough that are not financially viable to regenerate. • Simple maths; if developers stop building properties in Wandsworth as it's no longer sustainable/viable there will be less supply, therefore forcing up rental/purchase prices – the exact opposite of what this policy implementation is trying to achieve. <p>6. Disagree</p> <p>7. • Implementing Affordable Housing will substantially delay the decision period due to the negotiation period with legals, currently we enjoy decisions in 8-12</p>	<p>the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>weeks but this could increase to 70 weeks. The Planning Inspector who forced Lambeth to drop their Affordable Housing contributions for under 10 units which they were going to implement in their Sept 2021 Local Plan stated taking a sample of 60 schemes for minor developments the decision period took an average of 71 weeks due to the negotiation process of Affordable Homes Contributions. Example where this is currently happening is Southwark Council with over 100 small site schemes currently sitting in limbo awaiting their Affordable sites to be sorted out.</p> <ul style="list-style-type: none"> • Above will only clog up the Planning system further which still hasn't recovered to the standard assessment period of 8 weeks we enjoyed pre-covid. • Financial viability; holding costs of land at present is unsustainable with interest rates at a 15 year high, on a £1 million property which is pretty standard in Wandsworth developers are easily paying £12K month in interest waiting for a planning decision, if this increases from an average of 12 weeks to a possible of 70 weeks this alone will make development in the borough unsustainable. • Financial viability; costs of achieving planning permission has risen sharply recently due to stricter sustainability and biodiversity policies implemented. All developments now need to include green/brown roofs, air/ground source heat pumps, photovoltaics, enhanced building insulation, the associated costs of installing all these measures has pushed up building costs considerably on top of the increased material/labour costs since Brexit/Covid. • If it becomes too expensive for developers to develop in Wandsworth the derelict/run down sites dotted around the borough will not get developed and regenerated which will have a knock on effect on the surrounding street scene and in five years' time Wandsworth will look a very different borough from today with many rundown/derelict buildings/sites around the borough that are not financially viable to regenerate. • Simple maths; if developers stop building properties in Wandsworth as it's no longer sustainable/viable there will be less supply, therefore forcing up rental/purchase prices – the exact opposite of what this policy implementation is trying to achieve. 	

Rep No.	Respondent Name	Comments	Officer's Response
		<p>8. Strongly disagree</p> <p>9. • Implementing Affordable Housing will substantially delay the decision period due to the negotiation period with legals, currently we enjoy decisions in 8-12 weeks but this could increase to 70 weeks. The Planning Inspector who forced Lambeth to drop their Affordable Housing contributions for under 10 units which they were going to implement in their Sept 2021 Local Plan stated taking a sample of 60 schemes for minor developments the decision period took an average of 71 weeks due to the negotiation process of Affordable Homes Contributions. Example where this is currently happening is Southwark Council with over 100 small site schemes currently sitting in limbo awaiting their Affordable sites to be sorted out.</p> <ul style="list-style-type: none"> • Above will only clog up the Planning system further which still hasn't recovered to the standard assessment period of 8 weeks we enjoyed pre-covid. • Financial viability; holding costs of land at present is unsustainable with interest rates at a 15 year high, on a £1 million property which is pretty standard in Wandsworth developers are easily paying £12K month in interest waiting for a planning decision, if this increases from an average of 12 weeks to a possible of 70 weeks this alone will make development in the borough unsustainable. • Financial viability; costs of achieving planning permission has risen sharply recently due to stricter sustainability and biodiversity policies implemented. All developments now need to include green/brown roofs, air/ground source heat pumps, photovoltaics, enhanced building insulation, the associated costs of installing all these measures has pushed up building costs considerably on top of the increased material/labour costs since Brexit/Covid. • If it becomes too expensive for developers to develop in Wandsworth the derelict/run down sites dotted around the borough will not get developed and regenerated which will have a knock on effect on the surrounding street scene and in five years' time Wandsworth will look a very different borough from today with many rundown/derelict buildings/sites around the borough that are not financially viable to regenerate. 	

Rep No.	Respondent Name	Comments	Officer's Response
		<ul style="list-style-type: none"> • Simple maths; if developers stop building properties in Wandsworth as it's no longer sustainable/viable there will be less supply, therefore forcing up rental/purchase prices – the exact opposite of what this policy implementation is trying to achieve. 	
162	Carol Rahn	<p>4. Strongly agree.</p> <p>5. It is important to serve the younger residents and would-be residents of the borough and to maintain a diverse population in the borough.</p> <p>6. Strongly agree.</p> <p>7. The stock of social rent has been sadly neglected for more than a decade and must be rebuilt.</p> <p>8. Strongly agree.</p>	Support noted.
163	Yasser Rashid	<p>4. Strongly disagree</p> <p>6. Strongly disagree</p> <p>8. Strongly disagree</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes.</p>
164	Mark Rayner	<p>4. Strongly disagree.</p> <p>5. A policy forcing 50% of new dwellings to be affordable will make almost ALL smaller sites financially unviable and thus will decrease the number of new homes developed</p> <p>6. Disagree.</p> <p>7. HA's are not interested in owning 1,2,3,4,5 dwellings per site, they want 10+ units per site. Forcing developers to have 70% social rent on their affordable units</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy on overall housing delivery of a range of</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>will provide yet another road block to bringing small sites forward and will have a negative impact on availability of quality housing stock (whether social rent or affordable sale or private rent/sale)</p> <p>8. Strongly disagree.</p> <p>9. The affordable housing threshold should be increased to 12 units and phased from 12 to 18 units on an affordability basis. This would increase the number of units being developed and thus help towards reducing housing shortages in the borough and thus prevent further rent & house price increases</p> <p>10. The council need to heed simple supply & demand economics. If the objective is to ease pressure on rent rising and house price increase then the LPA needs to focus on increasing supply by supporting SME developers and making it easier & quicker to develop more housing and regenerate the dilapidated & underutilised plots within the Borough. Please speak with both Lambeth and Southwark councils to understand their drop in housing units being delivered from SMEs, as a direct result of the LPA making smaller sites unviable.</p>	<p>tenures in different scenarios, such as on small sites.</p> <p>For smaller sites of 9 homes or fewer, the Council anticipates that it would seek cash contributions rather than on-site affordable housing units (and subject to viability assessment where necessary) – this approach would mean that adoption of small numbers of affordable units by Registered Providers would not be an issue for developers.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>
165	Nick Renwick-Forster, Hadham Property	<p>4. Agree</p> <p>5. We agree that affordable housing is required within the borough but the burden should fall on larger development sites of 10+ units where it is more financially viable to provide these units.</p> <p>6. Agree</p> <p>7. Again we agree that 70/30 split is fair for larger 10+ unit schemes however is not financially viable for these smaller developments</p> <p>8. Strongly disagree</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>9. We agree that affordable housing is required within the borough but the burden should fall on larger development sites of 10+ units where it is more financially viable to provide these units.</p>	
166	Peter Rickenberg	<p>4. Strongly disagree</p> <p>6. Strongly disagree</p> <p>8. Strongly disagree</p> <p>10. Implementing Affordable Housing will substantially delay the decision period due to the negotiation period with legals, currently we enjoy decisions in 8-12 weeks but this could increase to 70 weeks. The Planning Inspector who forced Lambeth to drop their Affordable Housing contributions for under 10 units which they were going to implement in their Sept 2021 Local Plan stated taking a sample of 60 schemes for minor developments the decision period took an average of 71 weeks due to the negotiation process of Affordable Homes Contributions. Example where this is currently happening is Southwark Council with over 100 small site schemes currently sitting in limbo awaiting their Affordable sites to be sorted out. Above will only clog up the Planning system further which still hasn't recovered to the standard assessment period of 8 weeks we enjoyed pre-covid. Financial viability; holding costs of land at present is unsustainable with interest rates at a 15 year high, on a £1 million property which is pretty standard in Wandsworth developers are easily paying £12K month in interest waiting for a planning decision, if this increases from an average of 12 weeks to a possible of 70 weeks this alone will make development in the borough unsustainable. Financial viability; costs of achieving planning permission has risen sharply recently due to stricter sustainability and biodiversity policies implemented. All developments now need to include green/brown roofs, air/ground source heat pumps, photovoltaics, enhanced building insulation, the associated costs of installing all these measures has pushed up building costs considerably on top of the increased material/labour costs since Brexit/Covid.</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>If it becomes too expensive for developers to develop in Wandsworth the derelict/run down sites dotted around the borough will not get developed and regenerated which will have a knock on effect on the surrounding street scene and in five years' time Wandsworth will look a very different borough from today with many rundown/derelict buildings/sites around the borough that are not financially viable to regenerate.</p> <p>Simple maths; if developers stop building properties in Wandsworth as it's no longer sustainable/viable there will be less supply, therefore forcing up rental/purchase prices – the exact opposite of what this policy implementation is trying to achieve.</p>	
167	Michelle Ridge	<p>4. Strongly disagree</p> <p>5. It will stop small development companies from building in the area</p> <p>6. Strongly disagree</p> <p>7. It will stop small development companies from building in the area</p> <p>8. Strongly disagree</p> <p>9. It will stop small development companies from building in the area</p> <p>10. I don't see how it will encourage small developments to be built, if they are going to tax them even more. It will only increase the price of the properties, therefore be passed onto the purchaser. They will not be able to compete with big developers in the area.</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p>
168	Angus Robertson, Roehampton Trust	<p>4. Strongly agree</p> <p>5. Comments related to the Regulation 18 Statement: I strongly agree with the objective of increasing the proportion of homes that are affordable within new housing developments. I would like to see the greatest possible proportion as</p>	Support noted.

Rep No.	Respondent Name	Comments	Officer's Response
		<p>genuinely affordable homes i.e. Council rent homes, rather than other homes that are designated affordable but more expensive</p> <p>6. Strongly agree</p> <p>7. I am strongly in favour of the greatest proportion of new social rent homes as possible</p> <p>8. Strongly agree</p>	
169	Charles Rose, City Planning Ltd	<p>I write on behalf of several small and medium house builders and developers ("SMHBD") who refurbish properties and redevelop sites in the borough for housing. They wish to object to London Borough of Wandsworth's ("LBW") review of their Local Plan, which seeks to require affordable housing from small sites below the current threshold of 10 or more homes (gross).</p> <p>By way of background, Policy H2 of the London Plan ("LP") supports SMHBD. Paragraph 4.2.2 of the LP recognises that by increasing housing output on small sites can also help to support a number of related housing and planning policy objectives, including reviving the role of small and mediumsized developers in delivering homes in London. This is in recognition of the contribution they can play in delivering additional housing in London, as well as the need to broaden the pool from which that provision comes from. The SMHBD who we work with are currently experiencing a very difficult market. Build costs have gone up significantly over the last 24 months against a back drop of falling house prices and rising interest rates.</p> <p>The costs associated with achieving and delivering planning permissions has also risen steeply. This is known in the house building industry as "Policy Inflation." Minor planning applications now have to be accompanied at submission stage by a whole suite of specialist reports, including but not exclusively relating to; energy,</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified, viable and provides an adequate level of clarity as not to cause disputes around land value.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>sustainability, bio-diversity, ecology, accessibility/inclusivity and fire safety. Not only are these reports expensive to produce but the measures they recommend to ensure compliance with planning policy have significant costs implications as well. Such measures include green/brown roofs, air/ground source heat pumps (and the associated works to install them), photovoltaics, building fabric/insulation, bird/bat/bee boxes and tree planting.</p> <p>Equally important, "Policy Inflation" adds extra layers of complexity to both securing planning permission and delivering the development. SMHBD often do not have the in-house expertise or experience that is required to deliver these schemes and/or the up-front finances required to cover the costs. Against this background, many small sites (below 10 units) have their own complexities in terms of constraints and can therefore be speculative. The scale of developments often changes during the planning process, which in turn effects unit numbers and flat sizes and therefore viability.</p> <p>Seeking pre-application advice has now become a pre-requisite that has also contributed to the current process being significantly more expensive, time consuming and longer that it was five years ago. It is not unusual for the pre-application process to take as long as or longer to determination than a formal planning application. Moreover, the number of conditions that have to be discharged has increased and therefore the number of specialist reports, such as CMPs, CEMPs and Energy Statements required, has also increased. This again has significant cost and timescale implications.</p> <p>Rather than redevelop the existing housing stock to create additional housing, many clients are now adopting the industry named 'tart and turn' approach, where run down properties are simply refurbished and put back on the market in short order. This approach avoids the planning process entirely but also regrettably misses out on the real benefits sustainable development can deliver.</p>	<p>The Council will consider the policy's relationship with national policies. The Council will be working with the appropriate bodies to ensure that the policy is in conformity with other planning documents and guidelines and is justifiable and evidenced.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>Requiring affordable housing from small sites will undoubtedly exacerbate the issues cited in this letter for SMHBD, and dis-incentivise them further.</p> <p>Introducing affordable housing into the process could have the following negative effects on SMHBD:</p> <ul style="list-style-type: none"> • Create disputes on land values not only with the Local Planning Authority but with vendors. • Increases risk, particularly on constrained sites and speculative developments where the quantum of development is not clear from the outset and needs to be negotiated during the process. It will make viability more volatile. • It will lengthen the planning process. Disputes will need to be resolved and any contribution will need to be secured by way of legal agreements. Legal agreements often take longer than the statutory 8-week period to determine minor application. They also require legal input. • There will be increased costs associated with planning applications both in terms of consultancy/legal fees and holding costs. Interest rates are currently at a 15 year high. • It will add complexity to the process that will deter some SMHBD. • LBW will need to employ/train staff on viability issues which will require additional resources. In circumstances where there are disputes, external consultants may be required which will result in additional costs (consultancy fees and holding) for applicants. <p>Exacerbating the difficulties SMHBD are currently facing will slow down or worse still reduce the rate of development. It will provide one more hurdle for small site developers to attempt to jump over. As a result, it runs contrary to the national, regional and local aim of significantly boosting the supply of housing and unleashing the potential of small sites to make a significant contribution to meeting the housing needs in Wandsworth.</p> <p>In addition to the above, such a policy would also be in conflict with National Planning Policy Framework ("NPPF") published in September 2023. Paragraph 64</p>	

Rep No.	Respondent Name	Comments	Officer's Response
		<p>of the NPPF clearly states that the provision of affordable housing should not be sought for residential development that are not major developments (below 10 units). It would also be in conflict with the Written Ministerial Statement (28th November 2014) on the matter and the Secretary of State's letter dated 13th March 2020, and in particular Direction 3.</p> <p>In summary, SMHBD play an important role in the delivery of much needed additional and sustainable housing as recognised in the LP. Market conditions and Policy Inflation, as set out in this letter, have made it considerably more difficult and expensive for them to build houses in recent years, making schemes much more speculative. The introduction of affordable housing will significantly exacerbate these issues. This would compromise the delivery of new housing, which in turn would reduce supply and increase demand, thereby making housing less affordable and more expensive.</p> <p>For the reasons set out above, it is respectfully requested that the proposed policy relating to affordable housing on small sites is deleted. This view is given in the knowledge that LBW continue to meet and exceed their 5 year affordable housing target as confirmed in Table 1c of LBW Annual Monitoring Report 2021/22.</p>	
170	Bharat Savjani	<p>4. Strongly disagree</p> <p>5. 50% too high making development within Wandsworth unviable. This will drive developers who are part of the solution away.</p> <p>6. Disagree</p> <p>7. If more building were permitted then all housing would be affordable. 70/30 will increase pressure on Landlords to exit the business and thereby compounding the problem of social housing shortage. Excess Supply drives rents down</p> <p>8. Disagree</p>	<p>Comments noted.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>9. Small sites means small developers. They don't have the ability to buy the land cheap Nor do they have economies of scale when it comes to building the units.</p> <p>10. The solution to high rents and high house prices is to increase the supply to an extent that it outstrips demand thereby reducing prices. The way that can happen is to ease the burden on those on the supply side. And for the Local authority to build more. Housing and add to the supply.</p>	<p>data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p>
171	Chris Scott	<p>4. Strongly disagree</p> <p>5. This is a completely counterintuitive policy which will lead to less affordable housing in the borough and a complete erosion of existing property values damaging not only developers but private individuals</p> <p>6. Agree</p> <p>7. this is fair for larger schemes of 10 plus units as it is now but is not financially viable for small developments</p> <p>8. Strongly disagree</p> <p>9. This will destroy any development in the borough at all and will lead to higher rents and a reduced supply of affordable housing. Investment will leave the borough at an unprecedented rate.</p> <p>10. Implementing Affordable Housing will substantially delay the decision period due to the negotiation period with locals, currently we enjoy decisions in 8-12 weeks but this could increase to 70 weeks. The Planning Inspector who forced Lambeth to drop their Affordable Housing contributions for under 10 units which they were going to implement in their Sept 2021 Local Plan stated taking a sample of 60 schemes for minor developments the decision period took an average of 71 weeks due to the negotiation process of Affordable Homes Contributions. Example where this is currently happening is Southwark Council</p>	<p>Comments noted.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>with over 100 small site schemes currently sitting in limbo awaiting their Affordable sites to be sorted out.</p> <p>Above will only clog up the Planning system further which still hasn't recovered to the standard assessment period of 8 weeks we enjoyed pre-covid.</p> <p>Financial viability; holding costs of land at present is unsustainable with interest rates at a 15 year high, on a £1 million property which is pretty standard in Wandsworth developers are easily paying £12K month in interest waiting for a planning decision, if this increases from an average of 12 weeks to a possible of 70 weeks this alone will make development in the borough unsustainable.</p> <p>Financial viability; costs of achieving planning permission has risen sharply recently due to stricter sustainability and biodiversity policies implemented. All developments now need to include green/brown roofs, air/ground source heat pumps, photovoltaics, enhanced building insulation, the associated costs of installing all these measures has pushed up building costs considerably on top of the increased material/labour costs since Brexit/Covid.</p> <p>If it becomes too expensive for developers to develop in Wandsworth the derelict/run down sites dotted around the borough will not get developed and regenerated which will have a knock on effect on the surrounding street scene and in five years' time Wandsworth will look a very different borough from today with many rundown/derelict buildings/sites around the borough that are not financially viable to regenerate.</p> <p>Simple maths; if developers stop building properties in Wandsworth as it's no longer sustainable/viable there will be less supply, therefore forcing up rental/purchase prices – the exact opposite of what this policy implementation is trying to achieve.</p>	
172	Jeremy Scott, IndigoScott Group Limited	<p>4. Strongly agree</p> <p>5. The economics of 50% affordable housing will make sites unviable particularly for small developers like us</p> <p>6. Disagree</p>	<p>Comments noted.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>7. The housing associations buy at a deep discount to market value and social rented units are at the deepest discount so will adversely affect the economics of sites and make them less viable</p> <p>8. Strongly agree</p> <p>9. The viability of small sites is already hugely challenged by site purchase costs, planning and build costs without the benefit of economies of scale. Unlike large housebuilders small developers tend to live hand to mouth and site by site with debt finance costs running while planning is in play. Aside from the adverse impact on viability of having affordable housing on small sites, the delay and cost of viability negotiations will render them even less attractive with interest costs and consultant fees swamping the scheme costs. Small developers are likely to withdraw from the market due to this effect making these niche sites less likely to be developed as large housebuilders will not bother with them. This will reduce supply and make housing even less affordable and more concentrated in the hands of large development companies.</p> <p>10. The council would better serve its electors by streamlining and speeding up planning and making it more predictable. This would attract developers to the borough and increase supply which would hold down prices and make housing more affordable in the long run. Basically increase the size of the cake instead of trying to divide the existing cake more in a different way. If these proposals are passed I do not expect to continue to develop in Wandsworth</p>	<p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p>
173	Jason See, 1st Architects Ise	<p>4. Strongly disagree</p> <p>5. Affordable Housing Policy LP23 changes - all multi-unit developments to provide affordable housing units 1 for 1</p> <p>6. Disagree</p> <p>7. The 70/30 split is unrealistic for project viability in the main.</p>	<p>Comments noted.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>8. Strongly disagree</p> <p>9. The proposed affordable housing policy will cause numerous problems as listed in "additional comments", not achieving the intended result, whilst in fact causing harm to availability of reasonable / low cost accommodation.</p> <p>10. • Implementing Affordable Housing will substantially delay the decision period due to the negotiation period with legals, currently we enjoy decisions in 8-12 weeks but this could increase to 70 weeks.</p> <ul style="list-style-type: none"> • The Planning Inspector who forced Lambeth to drop their Affordable Housing contributions for under 10 units which they were going to implement in their Sept 2021 Local Plan stated taking a sample of 60 schemes for minor developments the decision period took an average of 71 weeks due to the negotiation process of Affordable Homes Contributions. • Above will only clog up the Planning system further which still hasn't recovered to the standard assessment period of 8 weeks we enjoyed pre-covid. • Financial viability; holding costs of land at present is unsustainable with interest rates at a 15 year high, on a £1 million property which is pretty standard in Wandsworth developers are easily paying £12K month in interest waiting for a planning decision, if this increases from an average of 12 weeks to a possible of 70 weeks this alone will make development in the borough unsustainable. • Financial viability; costs of achieving planning permission has risen sharply recently due to stricter sustainability and biodiversity policies implemented. All developments now need to include green/brown roofs, air/ground source heat pumps, photovoltaics, enhanced building insulation, the associated costs of installing all these measures has pushed up building costs considerably on top of the increased material/labour costs since Brexit/Covid. 	<p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<ul style="list-style-type: none"> • If it becomes too expensive for developers to develop in Wandsworth the derelict/run down sites dotted around the borough will not get developed and regenerated which will have a knock on effect on the surrounding street scene and in five years' time Wandsworth will look a very different borough from today with many rundown/derelict buildings/sites around the borough that are not financially viable to regenerate. • Simple maths; if developers stop building properties in Wandsworth as it's no longer sustainable/viable there will be less supply, therefore forcing up rental/purchase prices – the exact opposite of what this policy implementation is trying to achieve. 	
174	Andy Sellars	<p>4. Strongly disagree.</p> <p>5. I think this is very short-sighted, I feel like this will lead to fewer affordable homes not more as it will prevent a lot of developments coming forward. As this is borough-only not London-wide it will make Wandsworth a pariah for new housing at a time when we are suffering from a housing crisis. We need both affordable and non-affordable housing and this policy will lead to a big decrease in both types. Where buildings inefficiently occupy land they will remain in place and brownfield land will not come forward for redevelopment</p> <p>6. Agree.</p> <p>7. I think this approach is appropriate subject to the effect it has on viability of new developments</p> <p>8. Strongly disagree.</p> <p>9. I believe this policy was put in place to support SME/individual developers as well as a way of helping make smaller development sites more viable. This</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures including affordable housing and market housing.</p> <p>The Council will be seeking to update the January 2022 Porter Planning Economics report alongside an update of the Local Housing Needs Assessment, which will consider changes in the economy, and in housing need, in the intervening period.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>change will only I feel stop development which again does not make sense in the face of a housing crisis.</p> <p>10. These changes seem to be in stark contrast to the general political rhetoric of increasing housebuilding, I worry that Wandsworth will be a pariah and no new developments will be able to come forward in the borough which will just lead to house prices getting even higher and more unaffordable</p>	<p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p>
175	Sailesh Shah, Remys	<p>4. Strongly disagree</p> <p>5. 50% too much</p> <p>6. Disagree</p> <p>7. Again too much</p> <p>8. Strongly disagree</p> <p>9. • If it becomes too expensive for developers to develop in Wandsworth the derelict/run down sites dotted around the borough will not get developed and regenerated which will have a knock on effect on the surrounding street scene and in five years' time Wandsworth will look a very different borough from today with many rundown/derelict buildings/sites around the borough that are not financially viable to regenerate.</p> <p>10. • Simple maths; if developers stop building properties in Wandsworth as it's no longer sustainable/viable there will be less supply, therefore forcing up</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		rental/purchase prices – the exact opposite of what this policy implementation is trying to achieve.	
176	Tarik Sheikh, SHQ INVEST LIMITED	<p>4. Strongly agree</p> <p>5. 50% too much</p> <p>6. Disagree</p> <p>7. too much - not viable</p> <p>8. Strongly disagree</p> <p>9. Regulation 18 - LP23</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p>
177	James Simons	<p>4. Strongly disagree</p> <p>5. It is not viable to expect development to provide 50% affordable housing, they can barely cope as it stands.</p> <p>6. Disagree</p> <p>7. This is not realistic nor is it viable. Social Rent values to a developer are very low, so a net increase to 50% essentially means you are killing the viability of new build developments in the future.</p> <p>8. Strongly disagree</p> <p>9. As it currently stands, small sites struggle to deliver 30-40% affordable housing, especially with a stronger preference for lower value social rent units. If there limit is changed to any number of unit/ under 9 units, it will almost be certain that most sites will not be viable. Small development sites make up a good proportion of overall housing, allowing this to happen will effectively constrain small developers.</p> <p>sm</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p>

Rep No.	Respondent Name	Comments	Officer's Response
178	Josephine Simpson	<p>4. Strongly agree</p> <p>5. Socousing</p> <p>6. Strongly agree</p> <p>10. The increases in rent in the Private sector across London, is very concerning. It has made it necessary for councils to prioritise affordable housing.</p>	<p>Support noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures including private rent.</p>
179	Nrinder Singh	<p>4. Strongly disagree</p> <p>5. 50% is too much</p> <p>6. Disagree</p> <p>7. Too much</p> <p>8. Strongly disagree</p> <p>9. Implementing Affordable Housing will substantially delay the decision period due to the negotiation period with legals, currently we enjoy decisions in 8-12 weeks but this could increase to 70 weeks.</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p>

Rep No.	Respondent Name	Comments	Officer's Response
180	John Small	<p>4. Strongly disagree</p> <p>5. This would severely restrict the viability of development projects for small, medium sized and local developers. The effect of such a mandate would be that only large developers should build in Wandsworth.</p> <p>6. Strongly disagree</p> <p>7. As above - returns on affordable housing construction make will mean that most projects are no longer viable. The council should consult with small a medium sized developers to get an understanding of the cost implications of such a decision on them. A Tiered approach where affordable housing requirements are tied to unit number might be appropriate but the blanket application of an increased social housing and affordable housing requirement will suffocate development in the Borough which - like all Loddon Boroughs - needs more development, not less.</p> <p>8. Disagree</p> <p>9. Costs and margins in the current development climate need to be considered- as above this will apply inordinate pressure on that end of the development market that is most inclined to deliver smaller projects - this is exactly the market that needs to be encouraged to build. Moreover first time developers and local developers will often start with projects at this lower end, making it more difficult for new entrants will seve only to put upward pressure on prices, reduce build quality and unfairly strengthen incumbents. To the extend that additional regulations regarding affordable housing are being implemented they should be focussed on larger developments and larger developers.</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>
181	Benjamin Smith, Oakman	4. Strongly disagree	Comments noted.

Rep No.	Respondent Name	Comments	Officer's Response
	Architecture Ltd	<p>5. Local Councils are unable to meet the demands for the current 8 week planning period; adding a further layer of time delay into the process will be unsustainable for the developers that operate in Wandsworth.</p> <p>6. Strongly disagree</p> <p>7. Unless the affordable homes being offered are only for first homes, with a cap on ownership periods, with a means tested eligibility test, it makes the small number of affordable homes out of touch with what they really should be (i.e a helping hand up onto the ladder of home ownership).</p> <p>8. Strongly disagree</p> <p>9. As above</p>	<p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system. The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures including homes for first-time buyers.</p> <p>The Council will be seeking to update the January 2022 Porter Planning Economics report alongside an update of the Local Housing Needs Assessment, which will consider changes in the economy, and in housing need, in the intervening period.</p>

Rep No.	Respondent Name	Comments	Officer's Response
182	Andrew Solomon, Byoot	<p>4. Strongly agree</p> <p>5. 50% is far too much and will reduce much needed home building</p> <p>6. Disagree</p> <p>7. Again far too much and will reduce much needed home building</p> <p>8. Strongly disagree</p> <p>9. Implementing Affordable Housing will substantially delay the decision period due to the negotiation period with legals, currently we enjoy decisions in 8-12 weeks but this could increase to 70 weeks. The Planning Inspector who forced Lambeth to drop their Affordable Housing contributions for under 10 units which they were going to implement in their Sept 2021 Local Plan stated taking a sample of 60 schemes for minor developments the decision period took an average of 71 weeks due to the negotiation process of Affordable Homes Contributions. Example where this is currently happening is Southwark Council with over 100 small site schemes currently sitting in limbo awaiting their Affordable sites to be sorted out. Above will only clog up the Planning system further which still hasn't recovered to the standard assessment period of 8 weeks we enjoyed pre-covid. Financial viability; holding costs of land at present is unsustainable with interest rates at a 15 year high, on a £1 million property which is pretty standard in Wandsworth developers are easily paying £12K month in interest waiting for a planning decision, if this increases from an average of 12 weeks to a possible of 70 weeks this alone will make development in the borough unsustainable. Financial viability; costs of achieving planning permission has risen sharply recently due to stricter sustainability and biodiversity policies implemented. All developments now need to include green/brown roofs, air/ground source heat pumps, photovoltaics, enhanced building insulation, the associated costs of installing all these measures has pushed up building costs considerably on top of the increased material/labour costs since Brexit/Covid. If it</p>	<p>Comments noted.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system. The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>becomes too expensive for developers to develop in Wandsworth the derelict/run down sites dotted around the borough will not get developed and regenerated which will have a knock on effect on the surrounding street scene and in five years' time Wandsworth will look a very different borough from today with many rundown/derelict buildings/sites around the borough that are not financially viable to regenerate. Simple maths; if developers stop building properties in Wandsworth as it's no longer sustainable/viable there will be less supply, therefore forcing up rental/purchase prices – the exact opposite of what this policy implementation is trying to achieve.</p>	
183	Rochelle Springer	<p>4. Strongly agree</p> <p>5. There is a housing crisis going on at the moment, social housing waiting list for the Borough are only getting longer with thousands waiting for new homes to move to with issues such as overcrowding. If at least 50% of new developments we're allocated to social housing that could help reduce the waiting lists.</p> <p>6. Strongly agree</p> <p>8. Strongly agree</p>	Support noted.
184	Andrew Stanford	<p>A desire to provide more affordable homes in the borough is laudable but entirely misguided. It will lead to fewer affordable homes not more.</p> <p>The reason for this is as follows:</p> <p>Developers must provide schemes which are viable otherwise they will go elsewhere, such as a neighbouring borough with more realistic affordable housing targets or outside the GLA altogether (which has been happening a great deal over the last few years).</p> <p>Alternative uses such as hotels, offices, storage etc will become more viable than residential within the borough. Residential will be lost and if all uses are unviable</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>then nothing will happen which doesn't sound particularly appealing. Maybe it does to the Borough now?</p> <p>My other point, is that planning policy cannot be made in a vacuum. The property market and much of the economy is in the grip of a substantial downturn. Introducing these changes would almost certainly have the opposite effect to what you hope to achieve. Doing it now would be catastrophic. It would send a clear signal that would be developers of housing in Wandsworth, a borough that needs more housing of all tenures are not welcome and should go elsewhere. Who would benefit from that?</p> <p>I would urge considerable caution in adopting this policy change.</p>	<p>viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council allocates sites for specific types of development in the Local Plan to ensure a balance of use types in the borough. Departures from these allocations must be supported by robust evidence.</p>
185	Oliver St John	<p>4. Strongly disagree</p> <p>5. As someone who works in property development, this policy would act as a huge deterrent for small scale developers due to the lack of viability of projects, causing a knock on effect of a greater housing shortage than what exists already. If this policy is to happen it should only apply to huge developments not small sites.</p> <p>6. Strongly disagree</p> <p>7. Same answer as above</p> <p>8. Strongly disagree</p> <p>9. Same answer as above</p> <p>10. By carrying out this policy the knock on effect would be an increased housing shortage, forcing prices up even further - the exact opposite of what the policy intends to achieve. Developers already give huge amounts to Councils in CIL/S106 contributions.</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the</p>

Rep No.	Respondent Name	Comments	Officer's Response
			expectations of those engaging with the planning system.
186	Seb Steane, Pennard Developments Ltd	<p>4. Strongly disagree</p> <p>5. it will significantly diminish the delivery of housing in general.</p> <p>6. Disagree</p> <p>7. Appraisals need to be carried out on a basis where they are commercially viable</p> <p>8. Strongly disagree</p> <p>9. Small/medium sized developers suffer the most</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>
187	Rosie Sterry, Places for London (formerly TTL Properties)	<p>Places for London is TfL's new and financially independent property company, formerly known as TTL Properties under which name our previous representations were submitted. Places for London provides space for over 1,500 businesses in TfL stations and railway arches and on London's high streets. And now, it's working to release more of the untapped opportunity in TfL's property portfolio to deliver much-needed housing, to create places to live, work and play which are sensitive to local needs and communities and improve access for all. Places for London understand that this consultation is seeking views on the proposal to review the Local Plan policies as follows:</p> <ul style="list-style-type: none"> • To strengthen the Local Plan policy by setting out a clear policy requirement for new housing developments in the borough to provide at least 50% of dwellings as affordable homes delivered on site. • A greater proportion of all new affordable homes to be genuinely affordable, preferably a 70/30 split in favour of social rent. 	<p>Comments noted.</p> <p>The Council will consider the policy's relationship with the portfolio approach and London Plan policy. The Council will be working with the GLA and other bodies to ensure that the policy is in conformity with other planning documents and guidelines and is justifiable and evidenced.</p> <p>The Council will also consider the policy's relationship with national policies. The Council will be working with the appropriate bodies to ensure that the policy is in conformity with other planning documents</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<ul style="list-style-type: none"> To require affordable housing from small sites below the current threshold of 10 or more homes (gross) <p>Places for London has the following comments to make with regard to these proposals.</p> <p>Portfolio Approach</p> <p>Policy H4 (Delivering Affordable Housing) of the London Plan identifies that public sector landowners with agreements with the Mayor can take a portfolio approach to delivering 50% affordable housing across public landholdings in London. Places for London has such an agreement with the Mayor which provides the flexibility for more complex sites to come forward where they would be unviable providing the full 50% affordable housing requirement, whilst still providing a high level of affordable housing across all TfL landholdings. Places for London would like the local plan policy on affordable housing to acknowledge the portfolio approach to provide clarity.</p> <p>Small Sites</p> <p>Paragraph 64 of the NPPF states that "the Provision of affordable housing should not be sought for residential developments that are not major developments."</p> <p>Developments of 10 units or below do not constitute major developments as identified in the definition set out in the glossary of the NPPF. It is therefore contrary to national policy to seek on site affordable housing contributions on developments of 10 units or below. However, the borough could seek financial contribution towards affordable housing on such development sites where this is viable.</p> <p>Promotion of sites</p> <p>Whilst we appreciate that the Regulation 18 review consultation calls for comments on the draft local plan and is not a 'call for sites', we would</p>	<p>and guidelines and is justifiable and evidenced.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>nevertheless like to take this opportunity to reiterate that the following sites owned by TfL are available for development but not currently identified within the Local Plan. These being;</p> <ul style="list-style-type: none"> • Land at East Putney Station • 2, 2a, 2b, 2c and 2d Tooting Bec Road • Land at Trinity Road (inc. 4-8 Trinity Road) • Wandsworth Bridge Roundabout <p>Concluding Remarks We trust that we have provided sufficient information for the Council to be able to consider our representation and would appreciate if you could confirm receipt of this letter. Should you have any queries or require any additional information, please do not hesitate to get in touch.</p>	
188	Charles Stevenson, Lexington Properties	<p>4. Disagree</p> <p>5. Obviously the main reason for objection is the financial viability of these sites however if these derelict/run down sites do not get developed and regenerated it will have a knock on effect on the surrounding street scene and five years on Wandsworth will look a very different borough from today with many rundown/derelict buildings/sites around the borough that are not financially viable to regenerate.</p> <p>6. Strongly disagree</p> <p>7. Obviously the main reason for objection is the financial viability of these sites however if these derelict/run down sites do not get developed and regenerated it will have a knock on effect on the surrounding street scene and five years on Wandsworth will look a very different borough from today with many rundown/derelict buildings/sites around the borough that are not financially viable to regenerate. Negotiating Affordable Home delivery/Contributions creates massive delays which results in no small sites being developed. I think It is</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>important for Wandsworth to learn from the experience of their neighbours, in particular Lambeth as implementing such a policy for minor schemes will not work and only clog up the and delay the planning process even further than existing. Southwark are also now suffering massive delays due to implementing this policy with some 100 small sites schemes now just sitting in limbo waiting a decision with all developers leaving the borough.</p> <p>8. Strongly disagree</p> <p>9. AS above</p> <p>10. As a small to medium developer it will be impossible to continue working in Wandsworth for the reasons listed above.</p>	<p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>
189	Edward Stone	<p>4. Strongly disagree</p> <p>5. Negotiating Affordable Home delivery/Contributions creates massive delays which results in no small sites being developed. Therefore as with other boroughs who have tried to go down this route, even less property gets built as they are simply not financially viable.</p> <p>6. Strongly disagree</p> <p>7. For those organisations trying to provide new homes, a policy of this nature will simply render the scheme unviable unless the borough is minded to to underwrite the developer. If they don't this will be yet another roadblock to an even greater housing crisis as it will result in fewer jhomes being built and a massive planning log jam even worse than the current situation which is already untenable.</p> <p>8. Strongly disagree</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>9. if this is implemented, huge amounts of development opportunities will lay dormant as they will not be financially viable. This will have a knock on effect in the surrounding areas as the buildings deteriorate.</p> <p>10. Wandsworth really want to be part of delivering more properties for all people to live in, then they need to work WITH developers efficiently (speed up the planning process) to help them deliver their projects to market. The policies commented on in this survey will only lead to an even more debilitating situation for everyone. Far better to relax the planning regulations surrounding what developers can do with a building in order to deliver more residential space. Currently you have situations where buildings have been chopped about into substandard accommodation and developers can't touch them for various reasons ranging from "loss of accommodation" to outdated minimum size requirements! We have commercial stock just sitting empty, when developers given an opportunity could deliver a really good mixed use scheme! etc. If Wandsworth wants to help with affordability then it needs to help developers deliver more housing stock as this is the only realistic way to calm the cost of flats and houses and lower the barrier to entry, alongside the Government (Labor or Conservative) having a serious look at stamp duty.</p> <p>If you lower the threshold below 10 units then there WILL be less property. None of us want that!</p> <p>Good luck Edward Stone Acquisitions specialist working in Wandsworth and surrounding boroughs since 1994.</p>	<p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p>
190	Janine Streuli	<p>4. Strongly agree</p> <p>5. There is nowhere near enough genuinely affordable family housing in this borough. There needs to be more affordable housing that is strictly available for</p>	<p>Support noted.</p> <p>The Council aims to deliver local homes for local people, however the allocation of homes</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>local people and this should include genuinely affordable land for self-build purposes.</p> <p>6. Strongly agree</p> <p>7. There is a large proportion of society that is currently stuck in between social housing and supposedly "affordable" housing that is out of reach for many on decent, middle incomes. This gap needs closing and addressing.</p> <p>8. Strongly agree</p> <p>9. I agree particularly strongly if this option includes making land more affordable for self-builders. I sincerely hope that genuinely affordable options are made available for self-builders.</p> <p>10. I fully support the need for more affordable and genuinely affordable housing in the borough. As someone on part 1 of Wandsworth council's self-build register, I sincerely hope that this initiative will include affordable and genuinely affordable land for sustainable self-build purposes.</p>	<p>in the borough is not controlled by planning policy and can therefore not be influenced or altered through the Local Plan Partial Review.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council will be producing an updated Housing Needs Assessment which will provide an up-to-date picture of the scale of demand for self- and custom-build housing, which will enable informed decisions to be made on this issue as part of future plan reviews.</p>
191	<p>Natasha Styles, The Planning Bureau on behalf of McCarthy Stone</p>	<p>4. Strongly disagree</p> <p>5. Thank you for the opportunity to comment on the Wandsworth Local Plan Partial Review. McCarthy Stone is the leading provider of specialist housing for older people for sale in the UK. The Council is seeking views with regard to amending its recently adopted Affordable housing policy LP23. In doing so the Council is looking to take the affordable housing policy beyond the London Plan target of 50% affordable housing and to seek views on introducing a requirement to provide at least 50-% affordable housing on site instead. Given the limited consultation information the proposal would appear to also take away flexibility provided via the London Plan Viability Tested Route (VTR), that considers 35% affordable housing or the flexibility provided by adopted Local Plan policy LP23</p>	<p>Comments noted.</p> <p>The Council will be seeking to update the January 2022 Porter Planning Economics report alongside an update of the Local Housing Needs Assessment, which will consider changes in the economy, and in housing need, in the intervening period.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>point D that considers off-site provision and a financial contribution. We would remind the Council of the increased emphasis on Local Plan viability testing in Paragraph 58 of the NPPF and that the PPG states that “The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan” (Paragraph: 002 Reference ID: 10-002-20190509). The evidence underpinning the Council’s planning obligations and building requirements should therefore be robust. We would also like to remind the Council that the viability of specialist housing for older people is more finely balanced than ‘general needs’ housing and we are strongly of the view that these housing typologies should be robustly assessed in any forthcoming Local Plan Viability Assessment. This would accord with the typology approach detailed in Paragraph: 004 (Reference ID: 10-004-20190509) of the PPG which states that. A typology approach is a process plan makers can follow to ensure that they are creating realistic, deliverable policies based on the type of sites that are likely to come forward for development over the plan period. If this is not done, the delivery of much needed specialised housing for older people may be significantly delayed and compromised with protracted discussion about other policy areas such as affordable housing policy requirements which are wholly inappropriate when considering such housing need. It is already our experience that in London the high requirements for affordable housing, including the VTR route, are limiting opportunities to invest and build much needed older persons housing in the private leasehold sector. Indeed, a search for planning applications for older persons housing schemes shows that just 4 planning applications across the whole of London were submitted in 2023. My client, McCarthy Stone is unable to currently invest as it would want in order to address need in London due to high affordable housing costs despite the large need for specialist housing for older people especially in the private leasehold sector. The affordable housing requirement is severely limiting delivery of leasehold older person housing in the Borough. To confirm the need, the Wandsworth Local Housing Needs Assessment, GL Hearn December 2020 ('LHNA') identifies in Table 60 that there</p>	<p>collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures including specialist housing for older people.</p> <p>The consultants who have tendered for the Whole Plan Viability Assessment all have extensive experience in undertaking area-wide assessments and The Council has confidence that all relevant typologies, including specialist housing for older people, will be robustly assessed to ensure the plan is sound. Where individual sites present more challenging viability issues, the viability-tested route is available.</p> <p>The Council will consider the policy’s relationship with the threshold approach and London Plan policy. The Council will be working with the GLA and other bodies to ensure that the policy is in conformity with other planning documents and guidelines and is justifiable and evidenced.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>is a need for 1,914 units of leasehold housing with support and housing with care. Table 61 page 133 of the LHNA translates this into a percentage uplift needed on existing provision. This shows that there is a substantial 3400% uplift needed of housing with support (leasehold) and a 352% increase in housing with care (leasehold extra care). The same data at table 60 shows there to be an over provision of housing with support rented units of 795 units. This substantial need for leasehold older persons housing will only get worse if such a high affordable housing requirement with no flexibility is taken forward for older persons housing. This great need for older persons housing in London and concern with the high affordable housing requirement is expressed in a recent article for the 'Planning in London' Issue 124, January-March 2023, a copy of which is attached. We would direct the Council towards the Retirement Housing Consortium paper entitled 'A briefing note on viability prepared for Retirement Housing Group by Three Dragons, May 2013 (updated February 2013 ('RHG Briefing Note') available from https://retirementhousinggroup.com/rhg/wp-content/uploads/2017/01/CIL-viability-appraisal-issues-RHG-February-2016.pdf. The RHG Briefing Note establishes how sheltered housing and extra care development differs from mainstream housing and looks at the key variables and assumptions that can affect the viability of specialist housing for older people. These key variables include unit size, unit numbers and GIA, non-saleable communal space, empty property costs, external build cost, sales values, build costs, marketing costs and sales periods. As such, due to the differences and variables that older persons housing schemes have, such proposals are generally subject to the VTR due to viability issues and are then caught by the corresponding review mechanisms which create considerable uncertainty for providers and investors given that they are often small single phase developments where all facilities are provided in one block, and particularly slow in urban areas We note that the currently adopted Local Plan was supported by the Wandsworth Reg 19 Local Plan Viability Study, Final Report, January 2022, Porter Planning Economics with Three Dragons ('Viability Study'). This tested sheltered and extra care housing for viability across a range of scenarios This concluded at para 7.12 that 'For alternative types of residential developments covering older persons dwellings, the base case results in Table</p>	

Rep No.	Respondent Name	Comments	Officer's Response
		<p>7.2 show that the Reg 19 Local Plan policies can be afforded by the bulk of sites under current market conditions with normal site development costs (i.e. no abnormal costs) across most of the borough. Such developments in the lower value Zone 1 area are slightly more vulnerable, with the standard extra-care flatted scheme being able to afford, albeit marginally, to meet the Reg 19 Local Plan policies, but the standard retirement flatted scheme may require some flexibility in the Local Plan to avoid being put at risk of non-delivery'. This is therefore confirming that older persons housing schemes may struggle to deliver affordable housing and flexibility must be provided within any future policy to ensure that desperately needed leasehold sheltered/retirement flats are delivered. Notwithstanding the above there are some assumptions the viability consultants have made including at para 7.13 that 'However, in the real world, such schemes are often built by national retirement builders that will secure future revenue through service charges on shared facilities/spaces and management/health care charges. As such, the capitalised development value is often subsidised by the longer-term annual service charges related to these schemes, which make the business case for delivering these schemes more viable'. We confirm that my client does not secure revenue from service and management charges nor does it charge exit fees. This should not therefore be a consideration within a Viability Study to require a high affordable housing requirement when evidence shows a typology to be marginal with regard to viability. The Council must therefore ensure that an up-to-date viability assessment is undertaken to inform the review of the affordable housing policy. The new viability assessment must include a number of typologies that includes older person's housing and if older person's housing is found to be not viable an exemption must be provided within the plan in order to prevent protracted conversations at the application stage over affordable housing provision and compromising the provision of much needed older persons housing. For Older persons typologies this should be undertaken in consultation with the RHG Briefing Note.</p> <p>6. Disagree</p>	

Rep No.	Respondent Name	Comments	Officer's Response
		<p>7. Please see response to question 6. We would remind the Council of the increased emphasis on Local Plan viability testing in Paragraph 58 of the NPPF and that the PPG states that "The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan" (Paragraph: 002 Reference ID: 10-002-20190509). The evidence underpinning the Council's planning obligations and building requirements should therefore be robust. The Council must therefore ensure that an up-to-date viability assessment is undertaken to inform the review of the affordable housing policy. The new viability assessment must include a number of typologies that includes older person's housing. The assessment must also test various scenarios with regard to affordable housing split /mix to ensure that any requirement is viable and deliverable. If older person's housing is found to be not viable an exemption must be provided within the plan in order to prevent protracted conversations at the application stage over affordable housing provision and delaying the provision of much needed older persons housing. For Older persons typologies this should be undertaken in consultation with the RHG Briefing Note.</p> <p>8. Neither agree nor disagree</p>	
192	Moulham Suleyman, Silvercrow Ltd	<p>4. Strongly disagree</p> <p>5. 50% of dwellings as affordable on all development is both too high a percentage and completely unviable on small sites below 10 units. We certainly will not be able to deliver any development sites whatsoever in the borough if this comes into policy</p> <p>6. Disagree</p> <p>7. This should not apply to small sites below 10 units where it is nearly impossible to make developments viable with affordable housing</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		8. Strongly disagree	
193	PJ Sykes, Chamberland Residential	<p>4. Strongly agree</p> <p>5. It would halt Development. It is just too much.</p> <p>6. Strongly disagree</p> <p>7. It would halt Development - again it's just too much.</p> <p>8. Strongly disagree</p> <p>9. It would halt Development</p>	<p>Comments noted.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>
194	Benny Tang, Tang Low Development Ltd	<p>4. Strongly disagree</p> <p>5. Local Plan policy LP23 - I believe the current 9 units limit is appropriate. Extending the policy to below this will have an existential impact on SME developers. The time and cost on a small project will simply unsustainable. My company have converted a number of large private properties into flats, directly contributed to the shortage of housing. Extending the policy to below 9 units will simply force SME developer to cease trading.</p> <p>6. Disagree</p> <p>7. It depends on the size of the scheme and financial viability.</p> <p>8. Strongly disagree</p> <p>9. Local Plan policy LP23 - Answer as No.6. This policy would force most if not all SME developer to cease trading. Furthermore, no developer will implement such scheme and therefore, one will question if any small scale affordable housing contribution can be achieved.</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>10. This policy would have an effect of transferring private asset into public asset at a rate of 50% in the case of 1 on 1 contribution, which is unsustainable. It is the responsibility of the local government to provide and manage social housing, not private businesses.</p>	<p>the Council whilst also managing the expectations of those engaging with the planning system.</p>
195	<p>Rev Richard Taylor, St Barnabas Clapham Common</p>	<p>4. Strongly agree.</p> <p>5. Housing needs to be more affordable for key workers who work locally to enable them to live in the area if they choose</p> <p>6. Strongly agree.</p> <p>7. Renting should be a genuinely affordable alternative to buying for those who for good reasons do not want to own a home. It needs to be affordable and the rent paid needs to be fed back in to the system not taken as (excessive) profit by a private landlord</p> <p>8. Strongly agree.</p>	<p>Support noted.</p> <p>The Council will be seeking to update the January 2022 Porter Planning Economics report alongside an update of the Local Housing Needs Assessment, which will consider changes in the economy, and in housing need, in the intervening period.</p> <p>The Council will be collecting and testing evidence to support policy changes. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures including affordable, social and private rent.</p>
196	<p>Ben Temple, Temples London</p>	<p>4. Strongly disagree</p> <p>5. We need more housing and this is not the way to achieve more building. This will reduce supply</p> <p>6. Strongly disagree</p> <p>7. This is not the way to get more affordable housing</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>8. Strongly disagree</p> <p>9. This is the worst proposal of all and will stop development taking place</p> <p>10. I agree with the principle that we need more affordable housing but the way to do this is for housing associations to build more not restricting all other developments</p>	
197	Ty Tikari	<p>4. Strongly disagree</p> <p>5. The cost and complexity involved in delivering this policy will at best drive down the quality of the built environment and at worst stop development all together in the borough. The viability model incentivises councils to push for lower and lower build costs as a way to artificially drive up profit and create a larger commuted sum or on-site delivery of subsidised housing. This has the knock on effect that developers are forced to deliver the schemes to these low cost models and driving down the quality of construction for the next generation and producing poor outcomes for the built environment. There is no social benefit to this approach as everyone suffers when are building are poorly designed and built -especially at a time when policy should incentives all involved to drive up quality and importantly investment in low carbon sustainable design.</p> <p>6. Strongly disagree</p> <p>7. If private development is further restricted then new build private homes will cease to exist leading to a shortage which will push up prices requiring a further increase in subsidised housing to a point when all new housing will be subsidised. this is not a healthy or socially equitable way to run a city.</p> <p>8. Strongly disagree</p>	<p>Comments noted.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>9. The cost and complexity involved in providing affordable housing or s106 contributions on small sites is prohibitive and will lead to this type of development coming to an end. As a result more and more development will be large scale which is at odds with the historic typology of the London urban fabric. Small scale develop that is knitted into existing communities should be encouraged not discouraged.</p> <p>10. This policy is ill conceived and the real world effects of this policy will be to reinforce problems in housing inequality and entrench the monopoly of big house builders in the supply and delivery of our city whilst pushing up house prices and rents for everyone in the borough. I am strongly opposed and encourage the council to take an evidence based approach on how this policy will roll out in practice.</p>	<p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>
198	Nicola Tikari	<p>4. Strongly disagree</p> <p>5. I strongly disagree with this proposal. This would only harm small independent developers as with this policy no development on a smaller scale would stack up financially. Only very big commercial volume house builders could compete and absorb these extra costs, so our cities would be filled with uninspiring cheaply built architecture. Furthermore the viability process is a farce, and only enriches the teams of consultants. The additional costs and additional admin involved is adding to the burden and making investment even more unlikely. This policy would stifle investment on small scale which could otherwise contribute to achieve much needed house building targets. Also, the costs for this are handed back to the sale prices of the flats, which in turn drive up house prices and make them even more unaffordable, even for mid-income earners. This is a very short sighted policy, which will backfire. And the council will be wondering, why no new house would be built in Wandsworth.</p> <p>6. Neither agree nor disagree</p> <p>8. Strongly disagree</p>	<p>Comments noted.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include data to test the impact of the change in policy</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>9. I strongly disagree with this proposal. This would only harm small independent developers as with this policy no development on a smaller scale would stack up financially. Only very big commercial volume house builders could compete and absorb these extra costs, so our cities would be filled with uninspiring cheaply built architecture. Furthermore the viability process is a farce, and only enriches the teams of consultants. The additional costs and additional admin involved is adding to the burden and making investment even more unlikely. This policy would stifle investment on small scale which could otherwise contribute to achieve much needed house building targets. Also, the costs for this are handed back to the sale prices of the flats, which in turn drive up house prices and make them even more unaffordable, even for mid-income earners. This is a very short sighted policy, which will backfire. And the council will be wondering, why no new house would be built in Wandsworth.</p>	<p>on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>
199	Piers Tussaud, Londex Property	<p>4. Agree</p> <p>5. We agree that affordable housing is required within the borough but the burden should fall on larger development sites of 10+ units where it is more financially viable to provide these units.</p> <p>6. Agree</p> <p>7. We agree that 70/30 split is fair for larger 10+ unit schemes however is not financially viable for smaller developments</p> <p>8. Strongly disagree</p> <p>9. Implementing Affordable Housing will substantially delay the decision period due to the negotiation period with legals, currently we enjoy decisions in 8-12 weeks but this could increase to 70 weeks. The Planning Inspector who forced Lambeth to drop their Affordable Housing contributions for under 10 units which they were going to implement in their Sept 2021 Local Plan stated taking a</p>	<p>Comments noted.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable. This will include</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>sample of 60 schemes for minor developments the decision period took an average of 71 weeks due to the negotiation process of Affordable Homes Contributions. Example where this is currently happening is Southwark Council with over 100 small site schemes currently sitting in limbo awaiting their Affordable sites to be sorted out. Above will only clog up the Planning system further which still hasn't recovered to the standard assessment period of 8 weeks we enjoyed pre-covid. Financial viability; holding costs of land at present is unsustainable with interest rates at a 15 year high, on a £1 million property which is pretty standard in Wandsworth developers are easily paying £12K month in interest waiting for a planning decision, if this increases from an average of 12 weeks to a possible of 70 weeks this alone will make development in the borough unsustainable. Financial viability; costs of achieving planning permission has risen sharply recently due to stricter sustainability and biodiversity policies implemented. All developments now need to include green/brown roofs, air/ground source heat pumps, photovoltaics, enhanced building insulation, the associated costs of installing all these measures has pushed up building costs considerably on top of the increased material/labour costs since Brexit/Covid. If it becomes too expensive for developers to develop in Wandsworth the derelict/run down sites dotted around the borough will not get developed and regenerated which will have a knock on effect on the surrounding street scene and in five years' time Wandsworth will look a very different borough from today with many rundown/derelict buildings/sites around the borough that are not financially viable to regenerate. Simple maths; if developers stop building properties in Wandsworth as it's no longer sustainable/viable there will be less supply, therefore forcing up rental/purchase prices – the exact opposite of what this policy implementation is trying to achieve.</p>	<p>data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p>
200	Will Upton	<p>4. Strongly disagree</p> <p>5. We need more housing. We need the planning authorities to understand that the 50% affordable will proposal will make it impossible for developers to make and building project economically viable.</p>	<p>Comments noted.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>6. Neither agree nor disagree</p> <p>8. Strongly agree</p> <p>9. It is not only building materials costs and labour that have increased at an alarming rate, but costs and especially the long delays, typically ten to twelve months, for planning approvals or appeals, make any site that is financed, a loss. Lowering the threshold on the smaller sites would in effect stop these sites being built.</p>	<p>viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p>
201	Edward Vantreen	<p>4. Strongly disagree</p> <p>5. As a developer in the borough this will make the majority of sites unviable. And will simply mean moving my business out of Wandsworth and into boroughs that are more conducive to development. The planning process is already highly complexed and I simply won't be worth doing developments in the borough if the risk/reward ratio is altered. The majority of sites that will provide under 10 units have never been viable of affordable housing contributions, and forcing this allocation will just mean that the sites are left as they are. If developers stop building properties in Wandsworth as it's no longer sustainable/viable there will be less supply, therefore forcing up rental/purchase prices, which is the exact opposite of what this policy implementation is trying to achieve.</p> <p>6. Strongly disagree</p> <p>7. As above. The increase in genuinely affordable provision will benefit some, but cause an increase in purchase prices and rents for those outside that bracket, making Wandsworth even more expensive for the majority.</p>	<p>Comments noted.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>8. Strongly disagree</p> <p>9. As a developer in the borough this will make the majority of sites unviable. And will simply mean moving my business out of Wandsworth and into boroughs that are more conducive to development. The planning process is already highly complexed and I simply won't be worth doing developments in the borough if the risk/reward ratio is altered. The majority of sites that will provide under 10 units have never been viable of affordable housing contributions, and forcing this allocation will just mean that the sites are left as they are. If developers stop building properties in Wandsworth as it's no longer sustainable/viable there will be less supply, therefore forcing up rental/purchase prices, which is the exact opposite of what this policy implementation is trying to achieve.</p> <p>10. I strongly disagree with the changes proposed, especially in relation to the provision suggested for sites under 10 units. It is already hard enough finding sites that comply with the local plan, executing them with increasing costs and providing good quality units for residents. If a social housing provision under 10 units was required, I would simply stop developing in Wandsworth and move my business elsewhere as it would not be financially viable. It would also be realistic in significantly longer planning applications, which again provides an unviable business model when holding vacant buildings, etc.</p>	
202	Tom Vantreen	<p>4. Strongly disagree</p> <p>5. Will provide a significant barrier to new development and therefore mean that net there will be less affordable housing and development.</p> <p>6. Neither agree nor disagree</p> <p>7. This is more an issue for the RP based on demand.</p> <p>8. Strongly disagree</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and</p>

Rep No.	Respondent Name	Comments	Officer's Response
		9. Most developments of this size are on the edge of viability and more affordable will not help.	delay in the planning application process and accelerate the delivery of housing.
203	Stephen Vantreen	<p>4. Strongly disagree</p> <p>5. This will have effect of reducing the number of schemes undertaken by private developers and will lead to a reduced number of social housing units provided out of private development schemes.</p> <p>6. Agree</p> <p>7. Those units provided should be used to maximise the the number of social rent units and leave the remainder of rental units to other providers to deal with</p> <p>8. Strongly disagree</p> <p>9. This will reduce the number of applications and in turn the number of social units actually provided. This can be seen in historic terms with the aggressive policy Lambeth had which resulted in much lower levels of development and in turn the social units provided and to the detriment o</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p>
204	Matt Verlander, Natural Gas Transmission	<p>If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.</p> <p>To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Gas Transmission wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult National Gas Transmission on any Development Plan Document (DPD) or site-specific proposals that could affect National Gas Transmission's assets.</p>	<p>Comments noted.</p> <p>No response required.</p>

Rep No.	Respondent Name	Comments	Officer's Response
205	Matt Verlander, National Grid Electricity Transmission	<p>NGET is happy to provide advice and guidance to the Council concerning their networks. Please see attached information outlining further guidance on development close to National Grid assets.</p> <p>If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.</p> <p>To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, NGET wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult NGET on any Development Plan Document (DPD) or site-specific proposals that could affect our assets.</p>	<p>Comments noted.</p> <p>No response required.</p>
206	Isabella Vevers	<p>4. Strongly disagree</p> <p>5. 50% is far too high</p> <p>6. Disagree</p> <p>7. It's too high</p> <p>8. Strongly disagree</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p>
207	Ian Vincent	<p>4. Strongly disagree</p> <p>5. Support of affordable homes should be done by taxation of development instead</p> <p>6. Strongly agree</p> <p>8. Strongly disagree</p> <p>9. Support of affordable homes should be done by taxation of development instead</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		10. It is more efficient from a legal, planning and onward running point of view to provide social housing via taxation of developments	
208	Mordechai Waldman	<p>4. Strongly disagree</p> <p>5. 50% is far too much</p> <p>6. Disagree</p> <p>7. This is far too much</p> <p>8. Strongly disagree</p> <p>9. Will clog up the Planning System</p>	<p>Comments noted.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p>
209	Anna Waterman	<p>4. Strongly agree</p> <p>5. There is a large homeless population and many others with second homes. We need to ensure that people have much greater access to housing - is a basic need that we are systematically denying sections of the population.</p> <p>6. Agree</p>	Support noted.

Rep No.	Respondent Name	Comments	Officer's Response
		<p>7. I am not familiar enough with the detail. My concern is whether 70/30 would offer insufficient opens for people who are not eligible for social housing but without genuinely affordable housing will need to move away.</p> <p>8. Strongly agree</p>	
210	Natasha Weller	<p>4. Strongly disagree</p> <p>5. 50% is way too much</p> <p>6. Strongly disagree</p> <p>7. Again, too much</p> <p>8. Strongly disagree</p> <p>9. • Implementing Affordable Housing will substantially delay the decision period due to the negotiation period with legals, currently we enjoy decisions in 8-12 weeks but this could increase to 70 weeks. The Planning Inspector who forced Lambeth to drop their Affordable Housing contributions for under 10 units which they were going to implement in their Sept 2021 Local Plan stated taking a sample of 60 schemes for minor developments the decision period took an average of 71 weeks due to the negotiation process of Affordable Homes Contributions. Example where this is currently happening is Southwark Council with over 100 small site schemes currently sitting in limbo awaiting their Affordable sites to be sorted out.</p> <ul style="list-style-type: none"> • Above will only clog up the Planning system further which still hasn't recovered to the standard assessment period of 8 weeks we enjoyed pre-covid. • Financial viability; holding costs of land at present is unsustainable with interest rates at a 15 year high, on a £1 million property which is pretty standard in Wandsworth developers are easily paying £12K month in interest waiting for a planning decision, if this increases from an average of 12 weeks to a possible of 70 weeks this alone will make development in the borough unsustainable. 	<p>Comments noted.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<ul style="list-style-type: none"> • Financial viability; costs of achieving planning permission has risen sharply recently due to stricter sustainability and biodiversity policies implemented. All developments now need to include green/brown roofs, air/ground source heat pumps, photovoltaics, enhanced building insulation, the associated costs of installing all these measures has pushed up building costs considerably on top of the increased material/labour costs since Brexit/Covid. • If it becomes too expensive for developers to develop in Wandsworth the derelict/run down sites dotted around the borough will not get developed and regenerated which will have a knock on effect on the surrounding street scene and in five years' time Wandsworth will look a very different borough from today with many rundown/derelict buildings/sites around the borough that are not financially viable to regenerate. • Simple maths; if developers stop building properties in Wandsworth as it's no longer sustainable/viable there will be less supply, therefore forcing up rental/purchase prices – the exact opposite of what this policy implementation is trying to achieve. 	
211	Robin Wemyss	<p>4. Strongly disagree.</p> <p>5. The economics of developing sites is marginal already under the current rules. If WBC moves to 50:50 then no one will develop any sites. Therefore you will get no social housing benefit - in fact you will get less.</p> <p>6. Neither agree or disagree.</p> <p>8. Strongly disagree.</p> <p>9. Small sites are not viable under this scenario.</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p>
212	Jed West	<p>4. Strongly disagree</p> <p>5. See my comments above. Totally unviable policy clearly not thought through at a delivery level. Policy makers need to engage with the developers and affordable</p>	<p>Comments noted.</p> <p>The Council will be seeking to update the January 2022 Porter Planning Economics report alongside an update of the Local</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>housing operators before they propose schemes that do not work and create a rod for their own back.</p> <p>6. Neither agree nor disagree</p> <p>7. There needs to be a provision of multiple tenure types. Social Rent is equally as important as affordable rent and shared ownership.</p> <p>8. Strongly disagree</p> <p>9. Again - this policy is not thought through. Who are you expecting to deliver and manage the units? You need to consult the market and seek advice from professionals before even considering the adoption of a policy like this.</p> <p>10. Whilst your proposal is for the public good and will no doubt be popular with local people it is not thought through for the reasons I have already explained. I would urge you to please consult with board level Directors of key housing associations who operate in your borough who will explain to you that this proposal is unviable for schemes of less than 10 units. Think about it. Why would a housing association spend the resource signing up 10 units across 10 schemes (the legal, professional fees and time) when they could sign up 15,20,100 units in one deal elsewhere?</p> <p>You stand a better chance of increasing the level of affordable housing being delivered in your borough by working with contractors and housing associations to deliver 100% affordable schemes on Council owned land. We are working with a number of councils including Bracknell Forest, High Wycombe and Runnymede on this very basis.</p>	<p>Housing Needs Assessment, which will consider changes in the economy, and in housing need, in the intervening period.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>Evidence provided by the updated Housing Needs Assessment will be tested as part of the viability testing process ahead of policy formulation.</p> <p>The Council will be collecting and testing evidence to support policy changes. This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures including social rent.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p>

Rep No.	Respondent Name	Comments	Officer's Response
			<p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>For smaller sites of 9 homes or fewer, the Council anticipates that it would seek cash contributions rather than on-site affordable housing units (and subject to viability assessment where necessary) – this approach would mean that adoption of small numbers of affordable units by Registered Providers would not be an issue for developers.</p>
213	George Sinclair Williams	<p>4. Strongly disagree</p> <p>6. Strongly disagree</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes.</p>
214	Lorraine Williams	<p>4. Strongly disagree</p> <p>5. As a person with basic knowledge of how viability of development really works, it is absolutely attainable for developments to be able to provide 50% affordable housing, let alone be able to deliver this on 9 unit scheme, which struggle the most. This is an attempt to sniffle development and make them unviable.</p> <p>6. Disagree</p> <p>7. While it would be nice to have, unfortunately the reality of the matter is that social rent unit are worth very little to a developer, that is to say developers will</p>	<p>Comments noted.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>not any margin on selling social rents units to housing associations and in some instances these units are loss making. Overall this drags down the projects entire viability even lower than what it used to be when developers were able to sell these units are intermediate or shared ownership.</p> <p>8. Strongly disagree</p> <p>9. To a normal person, they would say yes. But if you really understand the viability of small schemes you realise that not providing affordable housing on 9 units and below makes small schemes viable. Allowing 50% on small schemes will kill the SME sector, which is perhaps why this is being introduced!</p> <p>10. It would be far more practical and viable for the local authority to use the vast land banks, give themselves consent for residential use and contract out to a contractor to build true affordable housing. Meanwhile councils all around London sit on huge land banks and do nothing with them. There are certain examples in Wandsworth such as the Pocket scheme in central Wandsworth town, that show the council is able to use their own land and deliver good quality affordable housing.</p>	<p>viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p>
215	James Wilson	<p>-Firstly we would like to say that we are extremely shocked that we only found out about this consultation and proposed changes because an architect told us – and even he wasn't notified directly by you. Languard have been operating and based in Wandsworth for over 30 years. We deliver a significant percentage of the units in schemes below 10 units which makes our lack of consultation even more shocking.</p> <p>- The proposed changes would disproportionately hit small local firms who employ local people. Each development site is a mini-economy in its own right supporting the livelihood of hundreds of local people from labourers to carpenters to engineers to the guys who work at Travis Perkins. Larger firms tend to subcontract to larger companies from outside the area. Small companies directly employ local people who live near the sites we are working on.</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<ul style="list-style-type: none"> - Wandsworth has historically been pro-development and has seen large CIL revenues as a result; this move risks being counter-productive to the overall finances of the Borough. - May I draw your attention to the planning inspectorate report PINS/N5660/429/7. Linked here for ease: Lambeth Local Plan Report - final_3.pdf You will be aware that Lambeth Council attempted to instigate a similar change to their Local Plan and the inspectorate ruled against the proposal. May I bring your attention in particular to paragraphs 85-87. - The Planning inspector force Lambeth Council to drop their Affordable Housing Contributions for under 10 units which they implemented in their September 2021 Local Plan. It was found to substantially delay the decision period for these small sites and not as a result enough sites were being developed. The inspector stated that in taking a sample of 60 schemes for minor developments the decision period took an average of 71 weeks due to the negotiation process of Affordable Homes Contributions. This is not financially viable for local firms to buy and hold sites for this duration of time before planning is granted. This is all in a time when the central government is trying to streamline the planning process to increase the number of new homes being built. - Small developers can't afford to enter into a development deal with the uncertainty of the affordable housing ruling and time taken to get to that stage. This will be hugely detrimental to the number of units housing units delivered in the borough of Wandsworth. - Wandsworth is such an attractive borough because it is financially viable for small developers to redevelop the small buildings which line the vast majority of Wandsworth's roads. The proposed policy could lead to a degradation in the average level of the housing stock in the borough due to the additional costs imposed on developers. 	<p>Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Local Plan Review will consider the potential impacts, both positive and negative, of introducing a new policy approach on a wide range of stakeholders, including measures needed to support local employment.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>- Using the toolkit approach to negotiate an affordable housing contribution (on site or payment in lieu), a developer is allowed to make a 20% profit before affordable housing contributions are deemed payable. Macro-economic pressures facing all developers are such that profit margins are being squeezed to such an extent that achieving a 20% profit on a development is far from being a guaranteed position. As such, most developments in the borough of sub 10 units will have a zero contribution to pay. The developer will have additional costs to pay for surveyors and holding costs, and so profit margins will be squeezed even further.</p> <p>- Whilst the intention of the change to provide more affordable housing in the borough is admirable, the view that this will have a significant impact on supply is 2-dimensional in thinking. The damage to the supply of housing from smaller sites will far outweigh the gain from instigating this policy.</p>	
216	Jonathan Woodcock	<p>4. Strongly disagree</p> <p>5. 50% is to much.</p> <p>6. Disagree</p> <p>7. This percentage is just to much.</p> <p>8. Strongly disagree</p> <p>9. Local Plan policy LP23</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes.</p>
217	Matthew Woodham, JP Homes	<p>4. Strongly disagree</p> <p>5. 50% too much</p> <p>6. Strongly disagree</p>	<p>Comments noted.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>7. Again 50% is too much</p> <p>8. Strongly disagree</p> <p>9. • Implementing Affordable Housing will substantially delay the decision period due to the negotiation period with legals, currently we enjoy decisions in 8-12 weeks but this could increase to 70 weeks. The Planning Inspector who forced Lambeth to drop their Affordable Housing contributions for under 10 units which they were going to implement in their Sept 2021 Local Plan stated taking a sample of 60 schemes for minor developments the decision period took an average of 71 weeks due to the negotiation process of Affordable Homes Contributions. Example where this is currently happening is Southwark Council with over 100 small site schemes currently sitting in limbo awaiting their Affordable sites to be sorted out.</p>	<p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p>
218	Nick Woodworth, Qualitas London Ltd	<p>4. Strongly disagree</p> <p>5. The current planning system is broken, with planners taking far too long to make decisions and this will only make an already Glacially slow process even slower. It will also make developments completely unviable commercially.</p> <p>6. Neither agree nor disagree</p> <p>7. Affordable housing is good idea, but the developers are taking all the risk, covering all costs including inflationary costs over the last 3 years.</p> <p>8. Strongly disagree</p>	<p>Comments noted.</p> <p>The Council will be seeking to update the January 2022 Porter Planning Economics report alongside an update of the Local Housing Needs Assessment, which will consider changes in the economy, and in housing need, in the intervening period.</p> <p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>9. 10 is a reasonable no of units before affordable housing becomes viable and sensible, below that it does not make sense.</p> <p>10. This whilst in theory is a good idea, in practice is not. Developers have significant risk when embarking on a project and to reduce the threshold of affordable will stop development in its tracks..</p>	<p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p>
219	Keith Woolf, Domus Developments Ltd	<p>4. Strongly disagree</p> <p>5. No schemes would be financially viable; planning permissions would take longer than now, little would be built</p> <p>6. Strongly disagree</p> <p>7. I would look to build elsewhere or give up</p> <p>8. Strongly disagree</p> <p>9. As above</p> <p>10. The planning system is broken already; this will make it worse.</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>I have built 30 homes over the last few years and have a major scheme just through planning where we provide 40 % social housing. If you bring in these rules I will seek other boroughs or if this becomes a national policy, I will stop building altogether. We are a small independent op any struggling post covid - this would be the final nail in the coffin</p>	<p>the Council whilst also managing the expectations of those engaging with the planning system.</p>
220	Malcolm Wynder, Artesian	<p>4. Agree</p> <p>5. the 50% provision on larger schemes should be adhered to and not varied due to spurious financial models submitted by applicants</p> <p>6. Strongly agree</p> <p>8. Strongly disagree</p> <p>9. housing associations aren't interested in small one off provisions and noir are developers - developments won't be developed!</p> <p>10. s106 / CIL payments should be charged on all development to help fund AH and the cost should be known/fixed and not subject to negotiation and simply based on the gross sqft of the development. Financial viability statements that are used to negotiate a reduction in provision can be engineered or tweaked to give just about any outcome you like without it being an obvious 'fix' and such negotiation shouldn't be allowed.</p>	<p>Comments noted.</p> <p>For smaller sites of 9 homes or fewer, the Council anticipates that it would seek cash contributions rather than on-site affordable housing units (and subject to viability assessment where necessary) – this approach would mean that adoption of small numbers of affordable units by Registered Providers would not be an issue for developers.</p> <p>The Council must operate within national and regional policy and guidance which allows the viability tested route to be used by applicants where there are viability challenges on individual sites.</p> <p>Viability assessments are required to be carried out by suitably qualified professionals and robustly evidenced, and the same is true of the reviews on behalf of The Council. The Council has recently appointed a Viability Officer to manage these consultants and ensure that reviews are carried out with appropriate scrutiny. Guidance that is</p>

Rep No.	Respondent Name	Comments	Officer's Response
			<p>currently being drafted (expected to be adopted in July) provides further steers on this and is also intending to insist on the publication of FVAs in all but the most exceptional of circumstances, to increase transparency. For clawback mechanisms, all viability-tested applications must include a late-stage review mechanism in the S106 which looks at the actual values and costs upon completion and, where outcomes are more positive than anticipated at application-stage, the developer will be liable to make a cash contribution to affordable housing.</p>
221	<p>Ringo Yip, BR Home Advisor</p>	<p>4. Strongly disagree</p> <p>6. Disagree</p> <p>8. Strongly disagree</p> <p>10. Above will only clog up the Planning system further which still hasn't recovered to the standard assessment period of 8 weeks we enjoyed pre-covid.</p> <p>Following above, coupled with the high interest rate in the current market, it will add much financial pressure for any developer, which in turn slower new property development.</p> <p>The consequence is that it becomes too expensive for developers to develop in Wandsworth the derelict/run down sites dotted around the borough will not get developed and regenerated which will have a knock on effect on the surrounding street scene and in five years' time Wandsworth will look a very different borough</p>	<p>Comments noted.</p> <p>The Council will test and consider the impact of any policy changes on other aspects of the planning application process. Evidence collected will include aspects of financial viability and other policy costs and will seek to find a balance that meets the aspirations of the Council whilst also managing the expectations of those engaging with the planning system.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p>

Rep No.	Respondent Name	Comments	Officer's Response
		<p>from today with many rundown/derelict buildings/sites around the borough that are not financially viable to regenerate.</p> <p>If developers stop building properties in Wandsworth as it's no longer sustainable/viable there will be less supply, therefore forcing up rental/purchase prices – the exact opposite of what this policy implementation is trying to achieve.</p> <p>The proposed scheme does not work in those luxury area. Try to imagine those who willing to pay more than £1 million worth apartment but find that your neighbours are affordable homes. They will just consider buying properties in other boroughs instead. In the long run, Wandsworth will only attractive lower income groups.</p> <p>In light of these concerns, I propose a potential solution to balance the objectives of the planning policy. Consideration could be given to relaxing restrictions to allow residential property development in designated commercial zones and carefully selected greenbelt areas. This approach may facilitate the construction of more affordable homes while concurrently providing the council with increased revenue through Community Infrastructure Levy (CIL) payments.</p> <p>I appreciate your attention to this matter and trust that my objections will be carefully considered in the decision-making process. I am available for any further discussions or clarifications regarding my concerns.</p>	<p>The Council aims to produce a clear and robust policy to eliminate uncertainty and delay in the planning application process and accelerate the delivery of housing.</p> <p>The Local Plan review is focussed on affordable housing. The Council allocates sites for specific types of development in the Local Plan to ensure a balance of use types in the borough. Departures from these allocations must be supported by robust evidence. Development allocations are not subject to revision under this review. The rest of the Local Plan will remain in place.</p>
222	Simon Yuen	<p>4. Strongly disagree</p> <p>5. 50% is significantly too much.</p> <p>6. Disagree</p> <p>7. The proposed numbers are simply unrealistic and too high.</p> <p>8. Strongly disagree</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p>

Rep No.	Respondent Name	Comments	Officer's Response
223	Pieter Zitman	<p>4. Strongly agree</p> <p>5. We are in an affordable housing shortage crisis - all reasonable efforts should be made to increase the supply</p> <p>6. Agree</p> <p>7. Views should also be taken to ensure a strong supply of intermediate affordable homes. Some schemes should reflect this requirement.</p> <p>8. Neither agree nor disagree</p> <p>9. Schemes should be viewed on an individual basis, may not stack up financially and could slow down the planning process.</p> <p>10. We have a crisis of housing for younger working people. Over half have no housing options at all. We must address this shortage given their economic disadvantages in housing, educational costs and lower salaries. We, as a society, must support younger generations to give them a chance as they are the future.</p>	Support noted.
224	Not provided	No response.	No response required.
225	Not provided	<p>4. Strongly agree</p> <p>6. Strongly agree</p> <p>8. Strongly agree</p>	Support noted.
226	Not provided	<p>4. Strongly disagree</p> <p>6. Strongly disagree</p> <p>8. Strongly disagree</p>	<p>Comments noted.</p> <p>The Council will be collecting and testing evidence to support policy changes.</p>

Rep No.	Respondent Name	Comments	Officer's Response
227	Not provided	<p>4. Strongly disagree</p> <p>5. 50% social housing even from 2 unit is totally going to kill the development and housing in Wandsworth</p> <p>6. Strongly disagree</p> <p>7. i find it so difficult to get a social housing provider to even take 1 unit. It will create a lot of administration work for small developers and small projects.</p> <p>8. Agree</p> <p>9. anyone developiing more than 10 units are big developer anyways so thye can afford this</p>	<p>Comments noted. The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p> <p>This will include data to test the impact of the change in policy on overall housing delivery of a range of tenures in different scenarios, such as on small sites.</p>
228	Not provided	<p>4. Strongly disagree</p> <p>5. Current requirements are hard enough to provide, 50% will kill new build development unless the affordable discount is subsidised by government or housing associations</p> <p>6. Disagree</p> <p>7. Social values to a developer is practically loss.. making, so imagine having 50% of your total project being loss making. The principle of giving more affordable lies in the value they are worth at the end.</p> <p>8. Strongly disagree</p> <p>9. Big sites can barely provide 30%-40%. The SME sector will be killed off if they have to provide 50% AH. Windfall sites are able to come forward given the cap of 9 units, only having 4.5 profitable units out of 9 units, will render these project unviable.</p>	<p>Comments noted. The Council will be collecting and testing evidence to support policy changes. Viability testing will be a key part of the evidence collection and policy formulation. The Council will be seeking to ensure that the policy is justified and viable.</p>

Rep No.	Respondent Name	Comments	Officer's Response

Note that comments / submissions from respondents are included in the table in the form in which they were written. Those comments and responses preceded by numbers relate to questions posed on the Council's consultation portal. The response form used can be viewed in **Appendix A** and the questionnaire can be viewed in **Appendix B**.

Appendix 7 – Regulation 18 Response Form



Partial Review of Wandsworth's Local Plan (2023 - 2038)

First Consultation (Regulation 18)

23 October to 4 December 2023

RESPONSE FORM

The Council is inviting comments over a six week period on the Partial Review of the Local Plan. The Wandsworth Local Plan was adopted in July 2023, and sets out a strategic vision and objectives to guide the next 15 years of development in Wandsworth, ensuring that growth and renewal happens in a sustainable and co-ordinated way.

The Partial Review includes a review and update of Policy LP23 (Affordable Housing) and other policies as they relate to strengthening provision of homes for social rent for local people, together with any other consequential changes necessary for consistency across the Plan.

We welcome views from our local community as well as stakeholders and developers on our ambitions to deliver more homes for social rent. We are particularly interested in views on how policies could be amended to deliver on our affordable housing priorities and the evidence that the Council should gather to support the Partial Review.

For more information, please visit: www.wandsworth.gov.uk/localplan

How to respond

The consultation is on the 'Regulation 18' version of the draft Local Plan and the supporting Sustainability Appraisal. Please read the consultation documents and other background information which are available at Wandsworth Town Hall reception and at the borough's main libraries, and on the Local Plan website: <http://www.wandsworth.gov.uk/localplan>

We would be grateful if you could please respond electronically, online via our Consultation Portal (<https://haveyoursay.citizenspace.com/wandsworthecs/lp-23>). Please ensure your response is clearly labelled as 'Local Plan Partial Review – consultation response'.

You can also respond by completing this form, either electronically using Word or as a print out, and sending it to the Council by:

- Email to planningpolicy@wandsworth.gov.uk

- Post to Spatial Planning and Design Team, Environment and Community Services, Town Hall, Wandsworth High Street, Wandsworth, SW18 2PU.

All responses must be received by **11.59pm on Monday 4 December 2023**. Please note that responses will not be treated as confidential and those submitted anonymously will not be accepted.

Part A: Personal Details		
	1. Personal Details *	2. Agent's Details (if applicable)
Title		
First name		
Last name		
Job title (where relevant)		
Organisation (where relevant)		
Address		
Postcode		
Telephone		
E-mail address		

*If an agent is appointed, please complete only the title, name and organisation boxes but complete the full contact details for the agent.

Part B: About You...		
3. Please tell us about yourself or who you are responding on behalf of... (tick all which apply)		
Do you live in the borough?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Do you work in the borough?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Do you run a business in the borough?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Are you a student in the borough?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Are you a visitor to the borough?	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Data protection

Information provided in this form will be used fairly and lawfully and the Council will not knowingly do anything which may lead to a breach of the General Data Protection Regulation (GDPR) (2018).

All responses will be held by the London Borough of Wandsworth. They will be handled in accordance with the General Data Protection Regulation (GDPR) (2018). Responses will not be treated as confidential and will be published on our website and in any subsequent statements; however, personal details like address, phone number or email address will be removed.

For further details regarding your privacy please see the Council's information published at: www.wandsworth.gov.uk/privacy

Part C: Your Response

4. Please provide your comments below.

Please make it clear to which consultation document your comments relate to and include policy / paragraph references where applicable.

Please continue on a separate sheet / expand box if necessary.

Please note your detailed response should cover succinctly all the information, evidence and supporting information necessary to support / justify the response and any suggested change.

Following the consultation on the Partial Review of the Local Plan, we will consider and take account of all responses received. There will be a further opportunity to view and comment on the final draft

<p>version of the policy / policies next year, before submission in 2024 to the Secretary of State for examination in public by an independent planning inspector.</p>			
<p>5. If you are not on our consultation database and you respond to this consultation, your details will be added to the database. This allows us to contact you with updates on the progression of the Local Plan and other planning policy documents.</p>			
<p>If you do not wish to be added to our database or you would like your details to be removed, then please tick this box, complete Part A: Personal Details of this form and return it to us as appropriate.</p>			<input type="checkbox"/>
<p>Signature:</p> <p><i>For electronic responses a typed signature is acceptable.</i></p>		<p>Date:</p>	

Regulation 18 Questionnaire

Part C: Your Response				
4. Do you support our objective to strengthen the Local Plan policy requirement for new housing developments in the borough to provide at least 50 per cent of dwellings as affordable homes delivered on the site?				
Strongly disagree	Disagree	Don't know	Agree	Strong agree
5. Please explain your answer. <i>Where appropriate please make it clear which consultation document your comments relate to.</i>				
Please continue on a separate sheet / expand box if necessary.				
6. Do you support our objective that a greater proportion of all new affordable homes to be genuinely affordable, preferably a 70/30 split in favour of social rent?				
Strongly disagree	Disagree	Don't know	Agree	Strong agree
7. Please explain your answer. <i>Where appropriate please make it clear which consultation document your comments relate to.</i>				

--

--

Please continue on a separate sheet / expand box if necessary.

8. Do you support our objective to require affordable housing from small sites below the current threshold of 10 or more homes (gross)?

Strongly disagree	Disagree	Don't know	Agree	Strong agree
-------------------	----------	------------	-------	--------------

9. Please explain your answer.

Where appropriate please make it clear which consultation document your comments relate to.

Please continue on a separate sheet / expand box if necessary.
10. Please provide any additional comments below.
<i>Please make it clear to which consultation document your comments relate to and include policy / paragraph references where applicable.</i>

Please continue on a separate sheet / expand box if necessary.			
<p>Please note your detailed response should cover succinctly all the information, evidence and supporting information necessary to support / justify the response and any suggested change.</p> <p>Following the consultation on the Partial Review of the Local Plan, we will consider and take account of all responses received. There will be a further opportunity to view and comment on the final draft version of the policy / policies next year, before submission in 2024 to the Secretary of State for examination in public by an independent planning inspector.</p>			
<p>11. If you are not on our consultation database and you respond to this consultation, your details will be added to the database. This allows us to contact you with updates on the progression of the Local Plan and other planning policy documents.</p>			
If you do not wish to be added to our database or you would like your details to be removed, then please tick this box, complete Part A: Personal Details of this form and return it to us as appropriate.			
Signature: <i>For electronic responses a typed signature is acceptable.</i>		Date:	

For more information write to:
**Spatial Planning and Design,
Place Division,
Town Hall,
Wandsworth High Street,
London SW18 2PU**

Telephone: (020) 8871 6000
email: planningpolicy@wandsworth.gov.uk
or visit our website: www.wandsworth.gov.uk/planning

