

LONDON BOROUGH OF WANDSWORTH LOCAL PLAN PARTIAL REVIEW
(WLPPR)

INDEPENDENT EXAMINATION IN PUBLIC

WRITTEN STATEMENT MAIN MATTER 7:

Policy LP31: Specialist housing for vulnerable people and for older people

THURSDAY 6 NOVEMBER 2025

COUNCIL RESPONSES TO MAIN MATTER 7

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Abbreviations

GLA – Greater London Authority

HHS – Housing and Homelessness Strategy (2023)

HBP – Housing Background Paper (2025)

HNA – Housing Needs Assessment (2024)

NPPF – National Planning Policy Framework (December 2023)

SOCG – Statement of Common Ground

WLPPR – Wandsworth Local Plan Partial Review

WPVA – Whole Plan Viability Assessment (2024)

Question 7.1 - Are the requirements for Specialist Housing for Vulnerable People and for Older People set out in Policy LP31 justified by appropriate available evidence, having regard to national guidance, and local context, and is it in ‘general conformity’ with the London Plan?

The requirements for the development of specialist housing for vulnerable people and older people set out in Policy LP31 are justified by a robust evidence base which includes:

- **SD013** - Housing Background Paper (HBP) 2025
- **SD032** - Housing and Homelessness Strategy 2023-2028 (HHS) 2023
- **SD020** - Housing Needs Assessment (HNA) 2024
- **SD022** - Whole Plan Viability Assessment (WPVA) 2024

The Council considers it important that its development plan provides a clear indication of how development should respond to both national guidance and the local context with respect to specialist housing for vulnerable people and older people.

Policy LP31 supports national policy in the NPPF (December 2023) around planning for the needs of groups with specific housing requirements. The NPPF states that the need, size, type and tenure of housing for different groups in the community should be reflected in planning policies and should be informed by a local housing needs assessment. It goes on to say these groups should include older people (including those who require retirement housing, housing-with-care and care homes) and people with disabilities. Where Policy LP31 does not refer specifically to people with disabilities, it uses the term ‘vulnerable people’ as a broader umbrella term to cover a range of people with specific housing requirements.

Policy LP31 has been informed by the Housing Needs Assessment (HNA) 2024 (**SD020**) and specifically states that proposals for the development of specialist and supported housing will be supported where the applicant can demonstrate the accommodation meets an identified need. This is supported by paragraph 60 of the NPPF which states development should support groups with specific housing requirements as part of meeting the Government’s objective of boosting the overall supply of homes. Policy LP31 also sets out that the loss of existing specialist and supported housing will not be supported save for in specific circumstances.

A majority of the wording of Policy LP31 mirrors that of the adopted Policy LP31 in the Wandsworth Local Plan (2023-2038).

The requirements of Policy LP31 are also justified by evidence presented in Wandsworth’s Housing and Homelessness Strategy 2023-2028 (HHS) 2023 (**SD032**). Theme Five of the HHS (“Supporting residents with additional needs”) reinforces the Council’s commitment to helping residents with additional needs to

maintain their independence and pledges to achieve this through close working with Adult Social Services to identify need for the refurbishment or development of new supported housing, to support existing supported housing schemes delivered by registered providers and to support the building of inclusive and accessible homes. Policy LP31 directly reflects this strategy by protecting existing specialist and supported housing (Part A) and supporting the development of new specialist and supported housing (Part B). Supporting paragraph 17.68 in the Local Plan also states that the Council's priority is to help local residents to remain in their own home through additional support and adaptations, which reflects the ambition of the HHS. As clarified in supporting paragraph 17.69, "The Council's Housing and Homelessness Strategy 2023-2028 recognises the increasing demand for housing suitable for older people, those with disabilities and mental health needs, including supported housing, low cost market and affordable rent options" – Policy LP31 sets parameters for developments to support these demands.

Policy LP31 Part B.4, which requires specialist housing developments to provide affordable housing contributions in line with Policy LP23 (Affordable Housing), is justified by the HNA, which demonstrates a significant and urgent level of need for affordable housing, including specialist affordable housing. A detailed explanation of the need to optimise delivery of affordable housing from all sources, and a justification for the specific requirements within Policy LP23, is set out in the Council's Hearing Statement for Main Matter 2.

If specialist housing developments were not subject to the same requirements for affordable housing contributions as other housing developments are, this would lead to lower delivery of affordable housing overall, including specialist affordable housing. The viability testing of Policy LP31, set out in detail under Question 7.2, demonstrates the significant viability capacity of specialist developments to contribute towards greater amounts of affordable housing. By adding this requirement, Policy LP31 also conforms better with the London Plan Policy H13, which states in Part B.1 that specialist older people's housing provision should deliver affordable housing in accordance with 'Policy H4 Delivering affordable housing' and 'Policy H5 Threshold approach to applications'. As with all developments subject to Policy LP23, specialist housing developments which cannot viably provide affordable housing are able to use the Viability Tested Route set out in Policy LP23.

The Council notes that a representation received at the Regulation 19 stage suggested that the policy should prioritise applications proposed in locations with good transport links and proximity to healthcare facilities. Part B.3 of Policy LP31 – unchanged from the adopted Policy LP31 – addresses this by stating that proposals for the development of specialist and supported housing will be supported where: "The accommodation has access to good levels of public transport, and to shops,

services and leisure facilities appropriate to the needs of the intended occupiers”. This addition makes the policy aspirational as it strives for specialist housing of a high quality and in locations that best meet the needs of its residents.

Policy LP31 conforms with the London Plan insofar as it matches the requirements from London Plan Policy H13 (A.2) which states that specialist older people’s housing should be “well-connected in terms of contributing to an inclusive neighbourhood, having access to relevant facilities, social infrastructure and health care, and being well served by public transport”. This is reflected in Policy LP31 B.3 which states that “[Proposals for the development of specialist and supported housing will be supported where] the accommodation has access to good levels of public transport, and to shops, services and leisure facilities appropriate to the needs of the intended occupiers”.

In their consultation response at Regulation 19 stage, the GLA expressed general support for Policy LP31 but requested that the policy states a specific figure of need reflective of that given within London Plan policy – that is, for Wandsworth, the delivery of 120 new specialist homes per annum. Whilst Policy LP31 itself does not directly reference the London Plan’s borough-level target for new specialist homes per annum, the Council does not consider this necessary as this is referenced within the supporting text. In paragraph 17.70, directly following Policy LP31, the Council makes reference to the London Plan’s benchmark target for 120 new specialist older people’s housing units per annum, and makes clear that this should be considered in the context of more detailed local assessments of specific types of need. This would logically include consideration of the HNA, or any successor assessment, at the point of any planning application. During the process of agreeing a Statement of Common Ground (SOCG) with the GLA, this explanation has been accepted by the GLA with no further modifications requested. At the time of writing, the SOCG between the Council and the GLA is being agreed and both parties are satisfied that draft Policy LP31 makes appropriate reference to the Mayor’s indicative benchmark figure, as set out in Table 4.3 of the London Plan, and is, in all other respects, in general conformity with the London Plan.

The Council notes a representation which suggests that Part B.1 is unsound as it requires applicants to demonstrate a need for specialist housing when this need has already been established by the London Plan. The purpose of Part B.1 is not to presume against the need to deliver specialist or supported housing but rather to ensure that the specific type of specialist or supported housing proposed relates to an identified need at the time of the assessment, including with reference to the Council’s own evidence through the HNA. Specialist housing in itself is a very broad term that takes in a wide range of housing products which will be subject to different levels of need. Where developments come forward which respond to a need identified in the HNA, or another needs assessment, Part B.1 would be satisfied.

The Council notes a representation which suggests the Council should consider allocating specific sites for specialist housing. The site allocations contained within the Wandsworth Local Plan (2023-2038) are considered to provide sufficient breadth and flexibility such that they do not preclude or discourage proposals for specialist housing at a scale commensurate with identified need and the overall housing supply incorporates a buffer to its housing target. Since the adoption of the Wandsworth Local Plan (2023-2038), the Council has not identified a further need to allocate specific sites for specialist housing within site allocations and Policy LP31 is considered to provide a positive basis for considering proposals for specialist housing which come forward, with reference to the London Plan benchmark target.

The Council notes a representation which suggested that Policy LP31 ensures accessibility requirements are applied to specialist housing. Policy LP27 of the Wandsworth Local Plan (2023-2038) addresses accessibility requirements for all housing developments, requiring the adherence to London Plan Policy D7, which states that 90% of dwellings must meet Building Regulation requirement M4(2) (wheelchair adaptable) and at least 10% of dwellings must meet Building Regulation requirement M4(3) (wheelchair accessible). At this time, the Council has not identified a need to strengthen these policy requirements further, however, this will be monitored and reviewed as part of any future plan-making process where appropriate.

Question 7.2 - Are the requirements for Specialist Housing for Vulnerable People and for Older People set out in Policy LP31 positively prepared ‘in a way that is aspirational but deliverable’?

Yes, the requirements within Policy LP31 are positively prepared in a way that supports the sustainable development of specialist housing for vulnerable people and older people and in a manner that is aspirational but deliverable. The requirements strike a balance between protecting existing specialist housing and supporting the development of new specialist housing where it meets an identified need, whilst also appreciating that there will be instances where existing specialist housing is no longer viable in its existing use and would be more appropriately changed to a different use to contribute to other priority housing needs (for example Social Rent).

The specific requirement for specialist housing to contribute to affordable housing in line with Policy LP23 has been subject to detailed testing as part of the Council’s Whole Plan Viability Assessment (WPVA) 2024 (**SD022**), with further evidence included in the Housing Background Paper (HBP) 2025 (**SD013**).

The WPVA takes a typology-based approach to assessing viability which accords with Planning Practice Guidance (PPG) and wider best practice. Further information

on the approach taken to the WPVA is set out in the Council's Hearing Statement for Main Matter 2.

The WPVA tested a total of six specialist housing typologies (sites 43-48), comprising of three extra care and three retirement housing typologies of varying sizes. These typologies are considered to fairly reflect the more likely specialist housing development common to the Borough.

These tests demonstrate that the vast majority of specialist housing typologies can viably provide affordable housing equivalent to the thresholds set out in Policy LP23. Using the appraisal model of Appendix 8 in the WPVA, 84% of the tested sites can viably support at least 45% of affordable housing, with:

- BLV1 (Office), 69% of tests are viable
- BLV2 (Retail), 80% of tests are viable
- BLV3 (Industrial), 89% of tests are viable
- BLV4 (Cleared Land), 100% of tests are viable

Of the 16% of sites that could not viably support 45% of affordable housing, 76% of the unviable sites are located at lower value zones of below £9,200/sqm and 50% of the unviable sites are located on existing office space (BLV1). As set out in Section 15 to the HBP, the lower value zones have a weak correlation to the sites more prevalent in the Council's housing pipeline, with only 25% of the housing proposed within those areas. Furthermore, development in BLV1 in particular is relatively less likely, given the higher existing use values associated with office uses and the presumption in favour of protecting office space in the Council's Local Plan. Only 7.5% of the Council's housing pipeline falls within BLV1.

To further contribute to deliverability, in the minority of cases where it is not possible for a proposed specialist housing development to meet the full affordable housing requirements, developments would still have a clear route to permission by using the Viability Tested Route set out in Policy LP23. Moreover, were there to be reasons why it is not appropriate to deliver affordable housing on-site alongside a certain form of specialist housing because of, for example, safeguarding considerations, Policy LP23 provides clear mechanisms to allow delivery to take place off-site or via a commuted sum, in appropriate circumstances.

Question 7.3 - Is the Policy clearly defined and unambiguous so that it is evident how a decision maker should react to development proposals?

Yes, the policy is clearly defined, unambiguous and sets clear parameters for what is appropriate with regard to the development of specialist housing for vulnerable people and older people. The majority of the wording used in the proposed policy

LP31 is unchanged from the adopted policy which was found to be clearly defined and unambiguous as part of the Wandsworth Local Plan (2023-2028) Examination.

The Council notes that a representation received at the Regulation 19 stage suggested that the policy should make clearer how proposals to redevelop existing housing for older people and vulnerable people would contribute to meeting another “priority need”. One representation also identified that the word ‘of’ had been omitted from Part A. In response to these representations, the Council has proposed modifications (**M31/1** and **M31/2**, see Appendix) to Part A of Policy LP31 and the supporting text to clarify the requirements and more clearly identify how alternative forms of housing will be considered as replacements for specialist housing.

The Council notes that a representation received at the Regulation 19 stage suggested that the Council provides guidance regarding how an applicant can demonstrate that an existing property is no longer viable. The Council has not sought to prescriptively define how an applicant should demonstrate that there is no longer an identified need for the retention of the accommodation. Whilst marketing evidence will typically be required in instances where there is a viability reason, the provisions of Part A.1 would not exclusively relate to viability and could relate to wider changes in demand. Therefore, the Council considers it is best not to be overly prescriptive in how an applicant should demonstrate there is no longer an identified need for an existing property, other than that evidence should be robust.

Policy LP31 provides guidance on appropriate locations for the development of specialist housing for vulnerable people and older people, including an indication in supporting paragraph 17.72 that specialist accommodation in accessible locations, such as those close to public transport and key local services, is important.

Appendix: Table of Proposed Modifications

Details taken from the Schedule of Proposed Modifications suggested by the Council (April 2025) (SD015)

Mod Ref	Policy Ref	Policy or Paragraph Number	Response Reference	Proposed Modification	Reason for Modification
M31/1	LP31 (Specialist Housing for Vulnerable People and Older People)	Part A.	George Potter House of Battersea (REP051); Battersea Society (REP105); Southern Housing (REP042)	Where the loss of existing specialist and supported housing is proposed and satisfies the requirements of Part A, proposals for re-use or re-development of this housing will be supported where they would contribute to meeting deliver another form of priority housing for which there is an identified need (including social rent)	In response to representations, this modification would clarify the interpretation of Part A of Policy LP31 in relation to the phrase “priority housing”, in particular to insert a clearer test for proposals relevant to this clause. A corresponding modification to the supporting text is also proposed to improve the effectiveness of the policy.
M31/2		Paragraph 17.71		This policy seeks to resist the loss of various forms of specialist accommodation so that the level of provision in the borough is not reduced. However, the Council recognises the changing nature of care provision for older, vulnerable and homeless people. Where existing specialist accommodation does not meet modern standards or local need, the Council will support its re-provision or modernisation to ensure the provision of high-quality specialist accommodation which better meets the needs of older, vulnerable and homeless residents. The particular circumstances of each site will be taken on its own merits when considering the Council’s preference for no net loss of existing floorspace. Proposals to re-use or re-develop specialist housing will be expected to prioritise the use of the site to deliver other forms of housing for which there is an identified local need, with particular emphasis on contributing towards genuinely affordable housing and social rented housing.	