

Wandsworth Local Plan Partial Review (WLPPR)

Representations from the Battersea Society

Introduction

These representations follow from the response the Battersea Society made in February to the Regulation 19 draft of the Wandsworth Local Plan Partial Review (WLPPR). We have sought to follow the guidance set out in the Inspector's *Guidance Note*. We have also taken account of the GLA's letter of 24 February to Wandsworth Council commenting on the Regulation 19 draft, and of the Council's [Addendum to Whole Plan Viability Assessment: Site Testing](#) published in September.

Main Matter 1. Legal Requirements and Overarching Issues

We make no comment beyond stating our conclusion that the draft WLPPR is not compliant either with the London Plan, as set out in the GLA's letter of 24 February, nor with national policy as set out in the NPPF. We set out the reasons for that conclusion in our representations on Matters 2-7. We note at several points that important policy details are not set out in the main policy text, but relegated to the supporting text. We submit that in these cases the draft WLPPR fails the test of clarity.

Matter 2. Policy 23 Affordable Housing

In our response to the Regulation 19 draft, we welcomed the proposals to maximise the delivery of affordable housing within the London Plan strategic target of 50% of all new homes; that 70% of affordable homes should be for social rent; that for the remaining 30%, priority should be given to London Living Rent rather than other products; and that requirements for on-site, rather than off-site provision of affordable housing should be tightened. While we recognise that delivery of affordable housing has become even more challenging since the beginning of this year, we believe that these proposals remain aspirational but deliverable over the period of the Plan; and that they are in conformity with the London Plan and with Government policy.

In order to improve clarity in the policy, however, we believe that the *exclusion of London Affordable Rent from Social Rent, and of Shared Ownership and Discounted Market Rents* from intermediate housing should be stated clearly in the policy itself (Policy 23 A2) rather than being relegated to supporting text (paragraphs 17.16-17.17).

We also believe that *the definition of 'tenure blind' (Policy 23 A3)* does not provide sufficient clarity. While the aspirations are laudable, they do not take account of the reality that in order to meet the requirements of registered providers, with separate residential cores, and to keep service charges to a minimum, standards and services in affordable housing may be different from those in market blocks. Moreover, as drafted, the policy is at best in tension with the requirement in Policy LP30, which requires a separate entrance and core for affordable housing.

We noted in our Regulation 19 response that the wording of *Policy 23 A4 against the loss of affordable housing* is unclear. It suggests that the net uplift in social-rented units could be measured by numbers of "dwellings and/or habitable rooms", which implies measures which could give different answers.

As the GLA makes clear in its letter of 24 February, the proposed increase in the *threshold for the Fast Track Route (Policy 23 D)* is incompatible with the London Plan; and there is growing evidence suggesting that it would be likely to result in lower volumes of affordable housing. The Council's recent [*Addendum to Whole Plan Viability Assessment: Site Testing*](#) confirms that for the majority of sites and scenarios, 45% affordable housing, other than for purpose-built student accommodation (PBSA), would be unviable. Moreover, as we set out in our Regulation 19 response, the proposed requirement for both early and late-stage reviews for those developments that provide between 45% and 50% affordable housing seems without justification, and would be contrary to the London Plan.

We set out in our Regulation 19 response our reservations about the proposed charge of £50k per unit for *developments on small sites (Policy 23 B)*. While we recognise the need for the kinds of measures proposed in paragraph 17.13 to guard against any attempts to evade the threshold for major developments, we believe that this additional charge, combined with liabilities for CIL, may risk failure to build housing on otherwise viable small sites.

Matter 3. Policy LP24 Housing Mix

We pointed out in our response to the Regulation 19 draft that this policy is not supported by the available evidence, and is therefore incompatible both with the London Plan and with national policy. The proposal that up to 30% of market housing, and 40-45% of affordable housing should be provided as one-bed units flies in the face of all evidence. The recent Housing Needs Assessment (HNA) indicates that more than 4,000 households are currently overcrowded in affordable housing, and many have been waiting several years for moves to larger dwellings. It also shows that both in the private rented and in the owner-occupied sectors, the largest increases in prices arise when residents move from two-bedroom to larger flats and houses. This indicates high demand for larger dwellings. And a core conclusion of the HNA is that "the highest need is for 2 and 3 bedrooms; approaching 70% of the overall affordable need is for 2 and 3-bedroom properties".

Nothing in the HNA suggests that anything remotely approaching the minimum range proposed for one-bedroom dwellings - 20% for market housing and 30-35 for affordable housing - is required as a response to housing need. We must therefore urge that the indicative ranges for such dwellings be reduced to match the evidence presented in the HNA.

But further, we have strong reservations about both the HNA's methodology and some of its conclusions, especially its focus on two-bedroom dwellings. This seems to derive from its finding that half of the increase in projected households between now and 2038 will derive from couples without children; but nearly half of that increase derives from couples over the age of 65, not from inward migration or household formation. Most couples in that age group will thus already be resident in dwellings in Wandsworth, rather than in need of new housing, unless they decide to downsize; and the evidence shows they have a marked reluctance to do so. Since the HNA suggests that fewer of them are leaving the borough than in the past, the overall supply of larger houses depends increasingly on their demise.

But the biggest problem with the HNA is its sole focus on need and demand (with a marked tendency to present the two as equivalent). It fails, like previous exercises, to acknowledge that supply and demand are inextricably linked. The result has been over many years policies promoting an over-supply of one-bedroom and two-bedroom dwellings, which attract the young adults who, as the HNA and much other data shows, come to the borough from elsewhere to live in such dwellings. But they then move out when they need the larger

dwelling with three or more bedrooms of which there is a restricted supply in the borough. This militates against creating and sustaining the mixed and balanced communities that are repeatedly stated as core aims both in the current Local Plan and in the London Plan. It is not easy to understand why the Council wishes to continue with policies on housing mix that contradict those aims.

For all these reasons, we contend that the policy is not compatible with either the London Plan or with Government policy, since it fails to take account of the available evidence, and will put at severe risk the core aims set elsewhere both in the Local Plan and the London Plan to create balanced and sustainable communities. It will also worsen the significant fall in the numbers of primary age children in the borough. To repeat, the indicative proportions must be changed radically, away from any significant supply of one-bedroom dwellings, and towards more larger dwellings, including the three-bedroom and larger house needed by many families, especially those with teenage children. Otherwise, the WLPPR cannot meet the soundness test set out in the NPPF paragraph 36.

Matter 4. Policy LP 28. Purpose-Built Student Accommodation (PBSA)

In our response to the Regulation 19 draft, we supported the aim of restricting the provision of new PBSA, for the reasons set out in paragraph 17.42. We understand why some developers are keen on PBSA, since the unit costs tend to be cheaper than for conventional housing and because they provide large numbers of single-bed units towards housing targets. But that is no good reason for the kinds of overdevelopment of PBSA we have seen recently. In our response, we also supported the requirement in Policy LP28 A6, that priority should be given to the needs of first, recognised HEPs in Wandsworth, and then those in neighbouring authorities or within a practical travelling distance from Wandsworth. We sustain that support.

The requirement that new PBSA should be provided only on sites that are not suitable for conventional housing is highly restrictive. The number of sites in Wandsworth that might in principle be available for new student accommodation, but not suitable for 'conventional housing', must be very small indeed beyond the Roehampton University campus (see paragraph 17.45). We also believe that the term 'conventional housing' may require some definition if it is to meet the test of clarity. At the very least, it should refer, like the London Plan (paragraph 4.15.14), to Use Class 3 housing.

We believe that Policy LP28 B, attempting to guard against *loss of existing student accommodation* lacks clarity, and that there is a tension between the requirements set in the introductory text and B2, which restricts any loss of student accommodation to the ground floor and requires it to be replaced with active uses.

We also suggest that the policy set out in the supporting text paragraph 17.44 on the *on-site provision of affordable conventional housing* should be included in the main policy statement. We note and support the GLA's objections that priority should be given to conventional *student* housing; and that the policy should allow proposed developments to follow the Fast Track Route in order to comply with London Plan Policy H15.

Matter 5. Policy LP 29. Housing with Shared Facilities

In our response to the Regulation 19 draft, we supported the aim of restricting new developments of large-scale purpose-built shared living accommodation. As with PBSA, we

recognise the reasons why some developers are keen on these 'co-living' developments; but they do not meet the need for family-sized housing that is so pressing in Wandsworth.

Again as with Policy LP28, *the requirement that new PBSA should be provided only on sites that are not suitable for conventional housing is highly restrictive*. We also note the GLA's objection to the proposal that schemes should be subject to review mechanisms if they do not provide a contribution equivalent to at least 50% of units; and that the threshold should be reduced to 35%.

Matter 6. Policy LP 30. Build to Rent

We believe that this policy complies with the London Plan. And we support the suggestion in paragraph 17.64 that the Council should resist the inclusion of Discounted Market Rent products among the affordable housing to be provided. For the sake of clarity, this should be included within the policy itself, rather than being relegated to the supporting text.

Matter 7. Policy LP 31. Housing for Vulnerable and Older People

We agree with the GLA that in order to be fully compliant with the London Plan and with Government policy, this policy should include a clear assessment of need in accordance with the findings of the Housing Needs Assessment; and that it should set clear targets for housing for vulnerable and older people. We cannot understand why this has not been done.

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