London Borough of Wandsworth Local Plan Partial Review (WLPPR)

November 2025

Public Consultation 26 November 2025 to 14 January 2026



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1. Introduction

- 1.1. The Wandsworth Local Plan Partial Review (WLPPR) was submitted to the Secretary of State on 30th April 2025. Following the hearing sessions as part of the Examination in Public, which took place between 4th and 6th November 2025, the Planning Inspector has proposed a list of Main Modifications¹ to the WLPPR.
- 1.2. The proposed Main Modifications can be viewed:
 - On the Council's website <u>Local Plan Partial Review: Examination Wandsworth Borough Council</u>
 - In the Borough's main libraries (Balham, Battersea, Putney, Roehampton, Tooting and Wandsworth Town) during regular opening hours
 - At Wandsworth Town Hall (Wandsworth High Street, London SW18 2PU) during regular opening hours

2. Methodology

- 2.1 The Council is legally required under both European and UK law to prepare a Sustainability Appraisal (SA) of the WLPPR in order to help ensure that sustainability objectives which consider social, environmental and economic factors are taken into account during all stages of the Plan preparation. The full SA methodology can be found in the Sustainability Appraisal Wandsworth Local Plan Partial Review report (SD003). The scoped set of Sustainability Appraisal objectives are also at Appendix A.
- 2.2 The process of the SA has been integral to the development of the WLPPR at every stage, with findings published and consulted upon alongside the WLPPR at each stage of its preparation.
- 2.3 The SA process has been informed by, or involved, the preparation of a series of documents including the Integrated Impact Assessment (IIA) Scoping Report December 2018, the Sustainability Appraisal of the Pre-Publication Local Plan (Regulation 19) January 2025, and this Addendum report.
- 2.4 Sustainability Appraisal is an iterative process and has been used to assess policy options and site selection to ensure that the plan contributes to the achievement of sustainable development, and any potential negative impacts on sustainability are minimised or effectively mitigated.

¹ Main modifications are material changes to the submitted plan which are necessary to make it 'sound' and/or legally compliant.

3. Purpose of SA Addendum

- 3.1 This document (the SA Addendum) comprises an addendum to the Sustainability Appraisal of the Wandsworth Local Plan Partial Review (WLPPR) which was submitted as part of the Local Plan Examination. This Addendum is limited in its scope to those matters described below but should be read alongside the <u>Sustainability Appraisal of the Publication Local Plan (Regulation 19) January 2025</u> for a full understanding of the methodological framework and outcomes of the iterative SA process that has guided the WLPPR.
- 3.2 Since the WLPPR examination hearings which took place between 4th and 6th November 2025, a number of Main Modifications to the WLPPR have been proposed by the Inspector. These Main Modifications are likely to be required to make the Local Plan 'sound'². This SA Addendum provides an assessment as to whether the proposed Main Modifications to the Local Plan are likely to have significant impacts on the sustainability objectives. The SA Addendum considers the potential sustainability implications of each of the proposed Main Modifications and presents an assessment of any potential sustainability implications which might arise.
- 3.3 Consideration of each Main Modification is set out in Section 4. In every case, the Main Modification details the proposed modification and the reason for change, and an assessment of the impact of the change upon the findings of the Sustainability Appraisal is provided in the final column. Where a modification prompts a need to reassess the sustainability appraisal, the row is shaded, and the details are set out in Appendix B.
- 3.4 The proposed Main Modifications are subject to public consultation from 26 November 2025 to 14 January 2026. This is a supporting document to the consultation, along with an update to the Habitats Regulations Assessment, and comments can be made on these supporting documents during the consultation period. Responses will be forwarded to the Inspector, who will take them into account before issuing their report. Following the adoption of the WLPPR, the Council is required to issue a Sustainability Appraisal Adoption Statement.

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² Plans are 'sound' if they are: (a) Positively prepared, (b) Justified, (c) Effective, (d) Consistent with National Policy

4. Consideration of Main Modifications and Impacts on Sustainability Appraisal

4.1 The Main Modifications below are expressed by specifying the modification whereby additions are underlined, and removals are strikethrough. The page numbers and paragraph numbering below refer to the Publication Local Plan Partial Review (as submitted), and do not take account of the deletion or addition of text.

Table 1 - List of Main Modifications and Impacts upon Sustainability Appraisal

Mod ref	Policy / Location in Plan	Page	Proposed Modification & Reason for change	Sustainability Appraisal Impact*
			This modification addresses concerns raised by a number of representors and at the hearing sessions about the general conformity of Policy LP23 with London Plan Policies H4 and H5 with respect to the applicable thresholds and circumstances in which a late-stage review will be applied.	
			D. Applicants may use the Council's Fast Track Route set out in London Plan Policy H5, provided they meet the thresholds and requirements below and meet other Local Plan requirements.	Amended to align Policy LP23 with London Plan Policies H4 and H5.
MM1	LP23 (Affordable Housing)		The threshold for affordable housing on gross residential development is: a. a minimum of 35 45%; or	The modifications proposed alter key elements of Policy LP23 relating to the affordable housing threshold and review mechanisms which require a re-appraisal. Please see Table 3.
	Part D		b. 50% for public sector land where there is no portfolio agreement with the Mayor; or	
			c. 50% for Strategic Industrial Locations and Locally Significant Industrial Areas (LSIAs) in accordance with Policy LP34 (Managing Land for Industry and Distribution) and any non-designated industrial land that comes forward for residential uses in accordance with London Plan Policy E7 (Industrial intensification, co-location and substitution) where the scheme would result in a net loss of industrial capacity	

Mod ref	Policy / Location in Plan	Page	Proposed Modification & Reason for change	Sustainability Appraisal Impact*
			1. To follow the Council's Fast Track Route, major development proposals must meet all other criteria set out in Policy LP23. The Council requires a mix of 70% social rented housing (minimum) and 30% intermediate housing (maximum), and higher levels of social rented housing are strongly encouraged.	
			2. Fast tracked development proposals providing between 45-50% affordable housing by habitable room are not required to provide a viability assessment at application stage, however, an early and late review mechanism will be applicable.	
			3. 2. Fast tracked development proposals providing at least 50% affordable housing by habitable room are not required to provide a viability assessment at application stage and are not subject to a review mechanism, except where an agreed level of progress on implementation is not made within two years of the permission being granted, in which case an early-stage review will be triggered	

Mod ref	Policy / Location in Plan	Page	Proposed Modification & Reason for change	Sustainability Appraisal Impact*
MM2	LP23 (Affordable Housing) Paragraph 17.11		In response to representations, this modification would provide additional clarity over the interpretation of the phrase 'net uplift' in the context of Policy LP23 The affordable housing policy applies to all new housing developments, including new builds changes of use to wholly residential and mixed-use sites incorporating residential use, where planning permission is required. Given the high level of need for affordable housing in the borough, the Council's priority is to maximise the delivery of general-needs social rented housing. Where forms of housing are proposed which do not contribute to this need, they will only be considered appropriate if they meet a demonstrable and specific local need, which is supported by a clear evidence base. Furthermore, proposals which propose the loss of existing affordable housing will not be acceptable unless applicants can clearly demonstrate that the loss of this affordable housing would facilitate the reprovision of at least the equivalent amount of affordable housing overall, by numbers of dwellings and/or habitable rooms, and an overall increase in the number of social rented dwellings and/or habitable rooms. The Council will look to secure this within permissions and legal agreements as appropriate.	Amended to provide further clarification on how applicants should interpret provisions relating to a net uplift in the number of dwellings or habitable rooms The Modification is a point of clarification and does not constitute a substantial change to policy. As such, it does not necessitate alteration of the SA.

Mod ref	Policy / Location in Plan	Page	Proposed Modification & Reason for change	Sustainability Appraisal Impact*
ммз	LP23 (Affordable Housing)		This modification would resolve a potential anomaly in Policy LP23 whereby developments between 1 and 9 residential dwellings would potentially be expected to provide a financial contribution towards affordable housing irrespective of whether the proposal proposes to deliver affordable housing units on-site. This modification would establish an equivalency principle between on-site and financial contributions to improve the effectiveness of the policy.	
	Part B		Developments delivering between 1 and 9 residential dwellings (gross) are required to provide a financial contribution to support the delivery of affordable housing in the borough. The level of contribution required will be £50,000 per unit on a gross basis (subject to indexation), unless at least 15% of the units would be provided as affordable housing on-site.	Amended to provide further clarification on the circumstances in which small-scale developments providing affordable housing on-site will be considered exempt from the requirement for a
			See MM3.	financial contribution.
MM4	LP23 (Affordable Housing) Paragraph 17.14		For the purposes of Policy LP23, 'small sites' are those which deliver between 1 and 9 dwellings (gross). It is recognised that on-site delivery of affordable housing would be difficult to achieve for a majority of small sites and so the policy envisages that affordable housing contributions from small sites will primarily take the form of a financial contribution. All small sites will be required to make a financial contribution of £50,000 per gross dwelling, subject to viability. However, in circumstances where it is proposed that a small site development would incorporate affordable housing on-site, no financial contribution will be required as long as at least the equivalent percentage of units (15%) would be provided as affordable housing on-site. Small site developments providing affordable	The Modifications are points of clarification that are materially consistent in their purpose with the requirements of the unmodified version of Policy LP23 and do not constitute a substantial change to policy. As such, it does not necessitate alteration of the SA.
			housing on-site below the equivalent percentage of units (15%) will need to make a financial contribution equivalent to the difference between what is proposed and the equivalent percentage of units. All financial the contributions will be indexed annually in line with the Community	

Mod ref	Policy / Location in Plan	Page	Proposed Modification & Reason for change	Sustainability Appraisal Impact*
			Infrastructure Levy using the BCIS All-in tender price index, and the level will be assessed on the validation date of a planning application and secured through a legal agreement.	

Mod ref	Policy / Location in Plan	Page	Proposed Modification & Reason for change	Sustainability Appraisal Impact*
			In response to the plan-making reforms, February 2025, where it is confirmed that reforms will change the role of Supplementary Planning Documents where the affordability criteria is normally referred to, this modification would include this reference within the supporting text of the plan.	
MM5	LP23 (Affordable Housing) Paragraph 17.17		Intermediate housing within the borough includes Shared Ownership and London Living Rent. Intermediate housing should be delivered in compliance with the Council's Intermediate Housing Policy. The Council's latest affordability criteria and priority allocation for intermediate housing is included within the Council's Intermediate Housing Policy and annual Affordable Housing Update Report. The Council's priority within this tenure is to deliver intermediate housing as London Living Rent as this tenure caters for households on a lower relative income. Applicants will need to justify to the Council where other forms of intermediate housing are proposed, including on viability grounds, particularly if the number of social rented units proposed are impacted. Shared Ownership is unaffordable to a majority of local residents with affordable housing needs and will therefore only be accepted if it facilitates the delivery of a higher number of social rented dwellings and/or habitable rooms and this will need to be clearly set out to the Council as part of any planning application.	Amended to provide further clarification on how the delivery of intermediate housing should relate to established local affordability criteria. The Modification is a point of clarification and does not constitute a substantial change to policy. As such, it does not necessitate alteration of the SA.

Mod ref	Policy / Location in Plan	Page	Proposed Modification & Reason for change	Sustainability Appraisal Impact*
			For consistency with MM1, modifications to Paragraph 17.18 are necessary to clarify the application of thresholds and review mechanisms. In response to representations, this modification would also clarify the role of mid-stage reviews in relation to Policy LP23 and resolve apparent inconsistencies between Part D.2 of the policy, Paragraph 17.18 of the supporting text and the London Plan.	
MM6	LP23 (Affordable Housing) Paragraph 17.18		To incentivise housing delivery and conform to the London Plan, the Council's Affordable Housing policy sets out a Fast Track Route applicable within the borough. The Council's Fast Track Route has a minimum threshold of either 45.35% or 50% by habitable room depending on the type of site. Fast-tracked applications that provide between 45-50% affordable housing by habitable room, with the specified tenure mix within the policy will not be required to submit viability information at the planning application stage. However, they will be subject to an early stage review where an agreed level of progress is not made. and late-stage review. with a Mid-stage reviews may also be applicable at the discretion of the Council on large multi-phased developments If an application provides 50% or more affordable housing by habitable room, with the specified tenure mix within the policy, applicants will not be required to submit viability evidence at planning application stage or be subject to a review mechanism, unless an agreed level of implementation is not made within two years of permission. All applications triggering Policy LP23, regardless of the affordable housing percentage provided, must provide the tenure mix specified within Policy LP23, unless there is compelling viability evidence to justify any deviation. The Council's approach reflects the general principles of London Plan Policy H5, however, viability evidence developed as part of the Local Plan Partial Review shows that a higher level of affordable housing can be achieved within Wandsworth, justifying a different threshold to that included within the London Plan.	Amended for consistency with MM1 and London Plan Policy H5. The Modification is itself a point of clarification and does not constitute a substantial change to policy. As such, it does not necessitate alteration of the SA. However, this Modification is partly made necessary by MM1 which has required re-appraisal under SA. Please see Table 3.

Mod ref	Policy / Location in Plan	Page	Proposed Modification & Reason for change	Sustainability Appraisal Impact*
			Policy LP23 is aimed at fast-tracking applications that provide the threshold level of affordable housing, progressing applications more quickly and removing time otherwise spent on complex viability discussions, seeking to embed affordable housing requirements into land values and help deliver a higher level of affordable housing more quickly. If sites are unable to provide the appropriate level of affordable housing, applicants must use the Viability Tested Route and provide the maximum viable level	

Mod ref	Policy / Location in Plan	Page	Proposed Modification & Reason for change	Sustainability Appraisal Impact*
	<u>~</u>	Page	In response to representations, this modification would provide additional clarity over the interpretation of Part E of Policy LP23 which requires applicants to demonstrate how all potential public subsidy options for maximising affordable housing have been utilised. Applicants will be expected to demonstrate that all opportunities to secure public subsidy to deliver a greater number of affordable homes have been taken, particularly for any applications which are unable to achieve 50% without subsidy. This should include proactive and ongoing engagement with both the Council and Registered Providers at the earliest opportunity. The Council will support applicants to understand what public subsidy options may be available to them. Applicants should provide evidence with their applications to identify what public subsidy options have been sought and secured, and demonstrate the reasons why other public subsidy options have not been sought or secured. Evidence would include clear records of correspondence, meetings or applications with the Council, Registered Providers and/or funding providers. Public subsidy would include, but is not limited to, any form of grant and loan from a public body, land received at zero or discounted value, and other funding sources available to Registered Providers such as rent receipts, receipts from sale of land, sale of shared ownership properties or similar products, and other funding a Registered Provider may provide. Applicants must make clear the level of affordable housing that can be achieved with and without subsidy as part of any application. Guidance on use of public	Amended to provide further clarification on how applicants can evidence utilising opportunities to seek public subsidy. Modification is a point of clarification and does not constitute a substantial change to policy, and as such does not necessitate alteration of the SA.
			subsidy will be included in the Affordable Housing SPD and any successor document.	

Mod ref	Policy / Location in Plan	Page	Proposed Modification & Reason for change	Sustainability Appraisal Impact*
			In response to representations, this modification would provide additional clarity over the interpretation of requirements within Part A.2. of Policy LP23 which expects applicants to provide evidence of meaningful discussions with Registered Providers which have informed the proposal.	
MM8	LP23 (Affordable Housing) Paragraph 17.23		The Council understands that securing a Registered Provider is a fundamental part of affordable housing delivery in most cases. Registered Providers are more likely to bid for affordable housing if they are engaged early. As a result, the Council will expect all developers to ensure that they identify and seek the Council's approval of a Registered Provider to support the delivery of affordable housing on site at the time of submission of a planning application. Applicants should seek to evidence this through providing records of discussions, meetings or agreements that have taken place. To confirm on-site deliverability and/or establish notional values of affordable units which reflect local housing market conditions, evidence should be provided of discussions with at least the Council's preferred Registered Providers (RPs), or any other RPs recommended by the Council (Not for Profit and demonstrating a high standard of management). In exceptional cases where applicants can demonstrate it has not been possible to secure a Registered Provider early, this must be demonstrated through the provision of clear evidence. More guidance will be set out in the Affordable Housing SPD and any successor document. The onus will be on applicants to pay for any viability assessment if the proposal is not policy compliant and any cost of an independent assessment. If build costs need to be assessed, then applicants will also need to pay for these to be reviewed by an independent Quantity Surveyor	Amended to provide further clarification on how meaningful discussions with Registered Providers can be evidenced. Modification is a point of clarification and does not constitute a substantial change to policy, and as such does not necessitate alteration of the SA.

Mod ref	Policy / Location in Plan	Page	Proposed Modification & Reason for change	Sustainability Appraisal Impact*
MM9	LP23 (Affordable Housing) Paragraph 17.24		In response to representations, this modification would clarify the interpretation of "re-submitted" in the context of Paragraph 17.24, specifically to acknowledge that non-material amendment applications would not trigger additional early, mid or late-stage review mechanisms. All viability tested applications, and schemes which have been resubmitted for the Council's consideration where the original permission did not meet the threshold or required tenure split, will be subject to the inclusion of early, mid and late-stage review mechanisms at appropriate stages/ milestone(s) of the construction period. This requirement would generally not include non-material amendments but may include applications to vary conditions where the application of affordable housing policy is relevant. Where reviews are required, these will be expected to follow the formula set out in the London Plan unless otherwise	Amended to provide further clarification on how the policy will be applied to re-submitted applications. Modification is a point of clarification and does not constitute a substantial change to policy, and as such does not necessitate alteration of the SA.
			agreed by the Council.	

Mod ref	Policy / Location in Plan	Page	Proposed Modification & Reason for change	Sustainability Appraisal Impact*
			In response to representations, this modification would clarify that developments providing affordable housing below the full requirements of the policy will not be resisted provided that this is agreed through the Viability Tested Route.	
MM10	LP23 (Affordable Housing) Paragraph 17.25		Affordable housing will be secured on-site by way of a legal agreement. To incentivise developers to build out their permissions in a timely manner, an early-stage review will be inserted into all legal agreements securing affordable housing with a trigger date of 24 months after the date of the decision. Other than where agreed through the Viability Tested Route, the Council will strongly resist any development which provides less than a policy compliant offer of affordable housing on site	Amended to provide clarification on the operation of the Viability Tested Route. Modification is a point of clarification and does not constitute a substantial change to policy, and as such does not necessitate alteration of the SA.
MM11	LP24 (Housing Mix) Part E		In response to representations, this modification would allow proposals for specialist accommodation to evidence a housing mix need that differs from the preferred housing mix set out in the policy. [New bullet point] 5. In the case of specialist forms of housing falling within Use Class C3,	Amended to provide further clarification that specialist accommodation will be recognised as requiring a bespoke housing mix. Modification is a point of clarification
	Tare		the particular need for that form of housing where this is shown to differ to the preferred housing mix.	and does not constitute a substantial change to policy, and as such does not necessitate alteration of the SA.

Mod ref	Policy / Location in Plan	Page	Proposed Modification & Reason for change	Sustainability Appraisal Impact*
MM12	LP28 (Purpose Built Student Accommodation) Part A.1		In response to matters raised at the hearing sessions, this modification would clarify the meaning of Policy LP28 with respect to Part A.1. and create consistency with similar criteria within the development plan. It is necessary to avoid unduly restricting the ability for Purpose-Built Student Accommodation to come forward to sites that are unsuitable for conventional housing and instead applies a less restrictive criteria as to whether a proposal would compromise a site's capacity to meet the Borough's need for conventional dwellings. Is proposed on a site which is not suitable for conventional housing Would not compromise a site's capacity to meet the Borough's need for conventional dwellings:	Amended to provide further clarification on how the relationship between the supply of PBSA and conventional housing will be considered in order improve effectiveness. Modification is required to improve effectiveness of the policy and ensure the policy approach is more balanced and precise. However, the modification remains aligned to the objectives of the unmodified version of the policy and does not constitute a substantial change to policy. As such does not necessitate alteration of the SA.
MM13	LP28 (Purpose Built Student Accommodation) Paragraph 17.44		In response to representations, this modification would clarify that proposals to deliver the required contribution to conventional affordable housing on-site may be considered compliant with the policy in appropriate circumstances, including where this would be within a separate block. In exceptional circumstances where a student housing development is considered appropriate proposed on a site which could accommodate some conventional housing in a separate block, the equivalent level of affordable housing as required by Policy LP23 should may instead be provided as a separate block on the site as part of the scheme and phased accordingly	Amended to provide further clarification on the circumstances in which on-site affordable housing delivery by PBSA will be considered appropriate. Modification is a point of clarification and does not constitute a substantial change to policy, and as such does not necessitate alteration of the SA.

Mod ref	Policy / Location in Plan	Page	Proposed Modification & Reason for change	Sustainability Appraisal Impact*
			This modification is necessary for consistency with MM12. This modification would provide clarification as to how Part A.1. would be interpreted, with reference to the consistency of a proposal with the expected land use of the site, the balance of needs for student and conventional housing and the extent to which either or both needs are being met within the Borough and across London.	
MM14	LP28 (Purpose Built Student Accommodation) Paragraph 17.45		Proposals for new student accommodation which will prioritise supporting HEPs (Higher Education Providers) located within Wandsworth will be supported provided that they do not compromise a site's capacity for conventional housing accepted on sites that are not suitable for conventional housing, such as a site located within an existing HEP campus, where conventional housing would be inappropriate. In determining whether a proposal would compromise a site's capacity for conventional housing, the Council will have regard to the expected land use of the site as identified in any specific site allocation and area strategy policies, the existence of any extant consents for conventional housing on the site, the most up to date evidence on the need for student housing and conventional housing, and the extent to which each need is being met within the Borough and across London, having regard to the Council's most	Amended to provide consistency with MM12. Modification is a point of clarification and does not constitute a substantial change to policy, and as such does not necessitate alteration of the SA. See MM12.
			up to date Authority Monitoring Report and GLA monitoring reports.	

Mod ref	Policy / Location in Plan	Page	Proposed Modification & Reason for change	Sustainability Appraisal Impact*
MM15	LP28 (Purpose Built Student Accommodation) Paragraph 17.43		In response to representations, this modification would clarify how the affordable housing requirements within the policy would support the Fast Track Route set out in Policy LP23 and the London Plan, and provide additional clarity on the Council will interpret the policy where developments cannot viably provide a fully policy-compliant contribution towards both affordable student housing and conventional affordable housing. In particular, the modification would establish a clearer prioritisation between the two which will improve the policy's effectiveness. The financial contribution should be calculated on the basis of the difference between the Gross Development Value including the relevant policy requirement of affordable habitable rooms, and the Gross Development Value of the scheme with no affordable habitable rooms provided, subject to viability. Developments must provide a fully compliant contribution to both affordable student housing and conventional affordable housing to be eligible for the Fast Track Route set out in Policy LP23 (Affordable Housing). Where a development cannot viably provide a policy-compliant contribution towards both affordable student housing and conventional affordable housing, applicants must provide viability evidence in line with Policy LP23. Developments will be expected to first maximise their contribution towards conventional affordable housing, and any surplus above reaching full policy-compliance to conventional affordable housing should be used to then maximise their contribution towards affordable tousing SPD and any successor document. Proposals for student accommodation should ensure that this financial contribution is prioritised	Amended to provide further clarification on the circumstances in which PBSA developments will be eligible for the Fast Track Route set out in the London Plan and Policy LP23. Modification is a point of clarification and does not constitute a substantial or material change to policy, and as such does not necessitate alteration of the SA.
MM16	LP28 (Purpose Built Student Accommodation)		In response to representations, this modification would clarify Part A.8. of the policy to make clearer that making facilities available to the wider community will be subject to feasibility, acknowledging a	Amended to provide further clarification that PBSA developments are only expected to

Mod ref	Policy / Location in Plan	Page	Proposed Modification & Reason for change	Sustainability Appraisal Impact*
	Part A.8.		concern raised by some representors that safeguarding considerations restrict the ability to make certain facilities available to the public.	make facilities available to the wider community where this is feasible.
			8. Can make facilities provided for student residents available to the wider community, where feasible, particularly where there is an acknowledged shortfall in such provision within the neighbourhood;	Modification is a point of clarification and does not constitute a substantial change to policy, and as such does not necessitate alteration of the SA.
			In response to matters raised at the hearing sessions, this modification would make it clearer how proposals resulting in the loss of existing student accommodation will be considered, improve	
MM17	LP28 (Purpose Built Student Accommodation) Part B		internal consistency and apply clearer and better-defined tests. B. The loss of existing student accommodation will be permitted when it is demonstrated that the facility no longer caters for current or future needs and: the floorspace is replaced by another form of residential accommodation that meets other Local Plan housing requirements. Proposals for a change of use of existing student accommodation which result in the net loss of student residential floorspace will only be permitted when: 1. The loss of student accommodation housing would be replaced by another form of housing for which there is an identified need; priority	Amended to provide further clarification on the circumstances in which developments resulting in the loss of existing student accommodation will be considered appropriate. Modification comprises a number of points of clarification however these do not, individually or cumulatively, constitute a substantial or material change to policy, and as such do not necessitate alteration of the SA
			housing need; or 2. The loss of student accommodation would be solely at ground floor level; and	

Mod ref	Policy / Location in Plan	Page	Proposed Modification & Reason for change	Sustainability Appraisal Impact*
			 a. The development would replace the ground floor student accommodation with appropriate active ground floor town centre uses as defined in the glossary; and b. The proposed ground floor—uses would pass the sequential test for main town centre uses in accordance with Policy LP43 (Out of Centre Development) 	
MM18	LP29 (Housing with Shared Facilities) Part D.3.		In light of MM1, this modification is necessary to make clear that large-scale purpose built shared living proposals will be subject to an affordable housing contribution equivalent to 50% of units and not those thresholds set out in a modified Policy LP23, in light of the Council's evidence justifying a higher contribution towards affordable housing from this type of housing. Provide a financial contribution towards the provision of affordable housing in the borough, equivalent to the corresponding threshold level set out in Policy LP23(Affordable Housing) 50% of units to be provided at a discount of 50% of the market rent. All large-scale purpose-built shared living schemes will be subject to the Viability Tested Route set out in Policy LP23, and any proposals which do not provide a contribution equivalent to at least 50% of units will be subject to review mechanisms (early, mid and late-stage)	Amended to resolve potential inconsistency with MM1 and clarify affordable housing requirements from Housing with Shared Facilities. The modification means that the affordable housing requirements from Housing with Shared Facilities are not affected by the modification to Policy LP23 proposed under MM1 by removing the cross-reference to Policy LP23 and stating the requirement directly in Policy LP29. In many cases, this would have no impact relative to the version of the policy appraised as part of the Publication Local Plan SA, however the modification may mean the effective affordable housing contribution from some developments is increased. As such,

Mod ref	Policy / Location in Plan	Page	Proposed Modification & Reason for change	Sustainability Appraisal Impact*
				the policy requires re-appraisal. See Table 5.
MM19	LP30 (Build to Rent)		In response to representations, this modification would make it clearer that the remaining 30 per cent of affordable housing required under Policy LP30 should be available at a range of intermediate rents, in line with the London Plan. It would also substitute the term 'low cost rented' with 'social rented' to resolve internal inconsistency.	Amended to provide external consistency with London Plan Policy H11 and internal consistency with the phrasing used in other policies.
	Part A.1.a.		Where a development has potential to include more than one residential core and/or block, applicants should use this separate core and/or block to provide to provide to provide to be managed by a registered provider. To follow the Council's Fast Track Route, 70 per cent of the overall affordable housing requirement should be provided as social rented units within this separate core and/or block, with the remaining 30 per cent at a range of genuinely affordable intermediate rents to meet priority housing need in Wandsworth	Modification is a point of clarification and does not constitute a substantial change to policy, and as such does not necessitate alteration of the SA.

Mod ref	Policy / Location in Plan	Page	Proposed Modification & Reason for change	Sustainability Appraisal Impact*
MM20	LP31 (Specialist Housing) Part A.		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. Where the loss of existing specialist and supported housing is proposed and satisfies the requirements of Part A, proposals for re-use or redevelopment 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)	Amended to provide further clarification on how provisions relating to the replacement of specialist housing with other housing will be interpreted. Modification is a point of clarification and does not constitute a substantial change to policy, and as such does not necessitate alteration of the SA.
MM21	LP31 (Specialist Housing) Paragraph 17.71		Modification required for consistency with MM20 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.	Amended for consistency with MM20. Modification is a point of clarification and does not constitute a substantial change to policy, and as such does not necessitate alteration of the SA.

5. Re-Appraisal of Relevant Policies

- 5.1 The tables within this section set out an appraisal of the modified versions of the policies included in the WLPPR where the Main Modifications proposed by the Inspector warrant re-appraisal, as identified in Section 4.
- 5.2. The approach and methodology for appraisal remains identical to that included in the Sustainability Appraisal undertaken at the Publication (Regulation 19) stage. For further information on the methodological framework and wider context to the SA process that has underpinned development of the WLPPR, please consult this document.
- 5.3. The key below identifies the approach to defining the scale, and timescales, of impacts of policy scenarios on the identified objectives.
- 5.4. These objectives are included in Appendix A.

++	likely (or intended) to be very positively affected	S	Short-Term Impact (2023 – 2027)
+	likely to be positively affected	M	Medium Term Impact (2028 – 2032)
0	likely to be neutrally or not significantly affected, or some impacts likely to be + and some -	L	Long Term Impact (2033+)
-	likely to be negatively affected		
-	likely to be very negatively affected		
	Policy not relevant to objective		

Key to SA Policy Impacts

Table 2 – Existing SA Appraisal of Policy LP23 (Affordable Housing)

Sc	Scenarios Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)											Conclusions	Mitigation										
		1	2	3	3 4	1 5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20		-
1	Retain Existing Policy (status quo)	very p	xisting ositive	ly agái		ective 12	and mee	e policy fo ts the Lon														All options score positively or very positively against objective 10 which is most relevant to the	
2	No Policy	in a ve sustai positiv Impac	ario 2 c ery pos nability e impa ets on c	sitive in object acts that objective	mpact or ctives, ho at can b ves 12 a	n objecti owever t e achiev and 13 a	ve 10, and he require ved by ens re conside	lan Policy d positive ements se suring affo ered to be needs of	impact et by the ordable mediu	s on obje E Londor housing m-term b	ectives 1 n Plan ar ı in Wand	2, 13 ar e not gr Isworth	nd 15. So anular o is delive	cenario : r locally red on t	2 would respons he basis	not prod sive. This of reliab	uce any means le and r	negative that scene	ve impac enario 2 local ev	ts on the would fo idence.	e orego	scenarios tested for Policy LP23, and all options would bring direct and indirect benefits to quality of life, health and equality in the borough.	
3	Update policy to additionally require an affordable housing contribution from small sites (fewer than 10 units)	exclus result and 9	ario 3 p sion an in grea dwellii	d heal ater ab ngs). F	Ith inequ oility to so inancial	ıalities. ⅂ ecure af I contribı	his scena fordable h utions ma	t objective ario would lousing the y take long oment, so	bring of the bring	direct and additional materialis	d indirect al financia se into th	t benefit al contri e delive	ts in qua butions t ery of aff	lity of life from dev ordable	e, health relopers homes t	, educati on smal han scer	ion and : I sites (i.	skills. T .e. those	his scen e propos	ario wou sing betv	The preferred policy option allows for viability to be considered on individual sites which ensures the policy would be achievable		
4	Update policy to introduce a local Fast Track Route at 45-50%	releva Londo longei	ario 4 v int sus on Plan r to be	tainabi Fast ī realise	ility obje Track Ro ed. As a	ctives be oute. Ho result, tl	ecause it wever, things option	n the exist requires d s option c scores ve scores 1	levelop could re ery posi	ers to pr quire a q itively wi	ovide a h greater a th a med	nigher le mount d ium-teri	evel of at of viabilit m impac	fordable y negoti t (to acc	housing ation wh	g than th ich could	e existin I mean t	ig policy that pos	/ when calling	onsideri acts tak	ing the	Borough. This scenario could have a more positive effect against the sustainability objectives in the short term, particularly given its local focus and the fact it	and mitigates potentially impacts on deliverability of developments subject to the policy.
5	Update policy to amend tenure split of affordable housing provision to 70:30 in favour of social housing	borou be fel increa explai	ario 5 v gh. As t in the ise the ns pos	a resu short afforda itive im	ılt, this p t term be able hou npacts a	oolicy wo ecause t using ter ugainst th	uld have a this option nure split f ne relevan	of social real avery posa a very posa on only char from 50:50 to objective viable opti	sitive im anges t), which es, how	npact on he tenur n means vever sce	objective re mix, no this scer enario 5 v	e 10 and ot the re nario wil vould sl	d 12, and nechanis Il deliver ightly mi	d positive sms for more so nimise o	e impact delivery ocially re overall ho	s agains of afford nted hon ousing te	t objecti lable un nes over nure op	ves 13 a its over all than portunit	and 15 a all. Sce the exis ies for a	and these nario 5 l sting poli Il resider	e would looks to cy. This	combines the benefits set out in the individual scenarios by boosting the delivery of affordable housing provision in the borough. It also scores highly against the relevant sustainability objectives, showing its potential to meet the Council's sustainability needs.	

Scenarios	Scop	ed Sus	stainabil	lity Obje	ective ar	nd Impa	ct (temp	oral - s	hort/me	edium/L	ong tern	n)									Conclusions	Mitigation
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20		
6 Combination of scenario 3, 4 and 5 (Proposed Policy)	agains This o	ario 6 is st objec option w	tive 15 b	oecause ng direct	it combi	nes the	positive nefits in o	aspects quality o	of all of	ther scer	ucation a	nd skills	through	n deliver	y of incr	ives 10,	ffordable	e housin	g in the	short		
			ng a grea ther sce				ented ho	ousing w	hich is	the type	most ne	eded in t	he Boro	ough, me	eaning ir	mpacts v	vould be	felt soo	ner with	this		

Table 3 – Amended SA Appraisal of Policy LP23 (Affordable Housing)

S	cenarios	Scop	ed S <u>u</u>	staina <u>bi</u>	lity Obje	ective a	nd Impa	ct (tempo	ral - s	hort/me	edium/L	ong ter	m)									Conclusions	Mitigation
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20		
1	Retain Existing Policy (status quo)	very p	xisting ositive		st objecti	ive 12 aı	nd meets	policy for sthe Lond														All options score positively or very positively against objective 10 which is most relevant to the scenarios tested for	
2	No Policy	in a ve sustai positiv Impac	ario 2 c ery pos nability e impa ets on c	sitive imp objectivacts that objectives	eact on o es, how can be a s 12 and	bjective ever the achieved I 13 are	10, and percent requirent to the terminal to the terminal to the terminal t	an Policy (positive ir nents set uring affor ed to be n	npacts by the dable h	on object London nousing n-term b	ectives 1 Plan ar in Wand	2, 13 ar e not gr Isworth	nd 15. S anular is deliv	cenario : or locally ered on t	2 would respons he basis	not prod sive. This of reliab	uce any means ble and i	negative that scene	ve impactenario 2 local evi	ts on the would fo dence.	e orego	Policy LP23, and all options would bring direct and indirect benefits to quality of life, health and equality in the borough. However, Scenario 6 is considered to be	The weedified
3	Update policy to additionally require an affordable housing contribution from small sites (fewer than 10 units)	exclus result and 9	ario 3 p sion an in grea dwellir	d health ater abilit ngs). Fina	inequali ty to sect ancial co	ties. Thi ure affor ontributio	s scenari dable ho ons may t	objective io would b using thro take longe ment, so the	oring di ough ac er to m	irect and dditiona aterialis	d indirect I financia se into th	t benefit al contri e delive	s in qua butions ery of af	ality of life from dev fordable	e, health elopers homes t	, educati on smal han scer	ion and I sites (i	skills. T .e. those	his scena e propos	ario wou ing betw	ıld /een 1	the preferred policy as it would deliver an increased amount of affordable housing of relative to other scenarios, particularly social rented housing which is the type most needed in the	The modified policy option allows for viability to be considered on individual sites which ensures the policy would be achievable
4	Update policy to introduce a local Fast Track Route at 45-50%	releva Londo longer	ario 4 w int sust on Plan r to be	tainability Fast Tra realised.	y objecti ack Rout . As a re:	ves beca te. Howe sult, this	ause it re ever, this option so	the existing equires de option co cores very ectives 13	velope uld req y positi	ers to pro quire a g ively wit	ovide a h reater a h a med	nigher le mount o ium-terr	evel of a of viabili m impa	iffordable ty negoti ct (to acc	housing ation wh	g than th ich could	e existir d mean	ng policy that pos	when cative imp	onsideri acts tak	ng the e	Borough. Whilst the modified policy may not maximise the amount of affordable housing secured from the most viable sites, it would reduce the need for viability negotiations on less	and mitigates potentially impacts on deliverability of developments subject to the policy.
5	Update policy to amend tenure split of affordable housing provision to 70:30 in favour of social housing	boroug be felt increa explain	ario 5 v gh. As t in the ise the ns pos	a result, short te affordab itive impa	this poli erm beca le housi acts aga	cy would ause this ng tenur inst the	d have a value of the solution	social rer very positi only chan om 50:50, objectives able optio	ive impages the which some which which some which which some with the weet and the weet where where the whole who we will be a constant of the weet where the weet and the weet where the weet and the weet where the weet and the	pact on le tenure means ever sce	objective e mix, n this scer nario 5 v	e 10 and ot the nario wil vould sl	d 12, ar nechan I delive ightly m	d positives for more so inimise of	e impact delivery cially re verall ho	s agains of afford nted hon ousing te	t objecti lable un nes ove nure op	ves 13 a lits over rall than portunit	and 15 a all. Scer the exis ies for al	nd these nario 5 le ting polie I residen	e would ooks to cy. This	viable sites at the application stage, and in some circumstances, may allow affordable housing to be delivered quicker. As a result, the modifications proposed, whilst optimising affordable housing delivery in a different way to the Publication version of the policy, are not	

Scenarios	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term) Conclusions Mit	Mitigation
	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	•
	considered to materially alter the overall appraisal	
	impacts identified. This scenario would	
Combination of Scenario 3 and 5 (Modified Policy)	Summary The modified version of Policy LP23 would retain the existing policy's alignment with London Plan Policies H4 and H5 with respect to the Fast Track Route but would incorporate the options appraised under Scenario 3 and 5 with respect to seeking affordable housing contributions from small sites and updating the tenure split to prioritise social rented housing. The modified policy would continue to result in a comprehensive policy for affordable housing provision that produces a very positive effect against objectives 10, 12 and 13 and scores positively against objective 15 because it combines the positive aspects of other scenarios. Whilst the modifications proposed would forego opportunities to maximise the delivery of affordable housing from the most viable sites, there are likely to be alternative benefits from the policy alignment with the London Plan Policies H4 and H5 in relation to reducing the need for viability negotiations at the application stage on less viable sites and, in some circumstances, increasing the speed at which development comes forward. As a result, whilst the modified policy may deliver slightly less affordable housing from the most viable sites, the modifications may achieve other benefits on less viable sites, and therefore on balance the overall appraisal impacts identified for the modified policy are considered broadly similar to the policy proposed in the Publication Version of the WLPPR. This option would continue to bring direct and indirect benefits in quality of life, health, education and skills through delivery of increased affordable housing in the short term, including a greater proportion of social rented housing which is the type most needed in the Borough, meaning impacts would be felt such as a corresponding to the proposed of the proposed in the proposed in the proposed proposed in the	

Table 4 – Existing SA Appraisal of Policy LP29 (Housing with Shared Facilities)

Sc	Scenarios					Sco	ped Su	stainab	ility Obj	ective a	and Imp	act (tei	mporal ·	- short/i	nediun	n/Long t	term)					Conclusions	Mitigation		
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20				
1	Retain Adopted Policy (Status Quo)										++ S	+ S	+ S			+ S			+ S						
		Policy of hea	Summary Policy LP29 is considered to have a very positive effect against the sustainability objective on housing provision (10) and is considered to be supportive of health and sustainable travel objectives. However, the adopted policy would not align with the proposed amendments to Policy LP23 and as such massecure less affordable housing contributions than alternatives.														Scenario 3 is the								
2	No policy	susta	ario 2 v inabilit	y object	ive 10, ł		the Lon	don Pla	n policy	would l	eave ga			- '	,			a very p ill make i			-	preferred policy option because it performs positively against all objectives appraised and secures the greatest benefits towards affordable			
3	Update Policy LP29 to align affordable housing requirements to the updated policy LP23 (Proposed Policy).	and s	ario 3 v sustaina	able tra	vel obje		This sc	enario v							. ,			red to be e greate				housing of all scenarios.			

Table 5 – Amended SA Appraisal of Policy LP29 (Housing with Shared Facilities)

Sc	enarios					Sco	ped Su	stainabi	lity Obje	ctive a	nd Imp	act (te	mporal -	short/n	nedium	n/Long t	erm)					Conclusions	Mitigation
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20		
1	Retain Adopted Policy (Status										++ S	+ S	+ S			+ S			+ S			Scenario 3 is the	
	Quo)	Poli of h	Summary Policy LP29 is considered to have a very positive effect against the sustainability objective on housing provision (10) and is considered to be supportive of health and sustainable travel objectives. However, the adopted policy would not align with the proposed amendments to Policy LP23 and as such may secure less affordable housing contributions than alternatives.														preferred policy option because it performs positively against all objectives appraised and secures the						
											++ S	0 S	0 5			0			0 %			greatest benefits towards affordable	
2	No policy	No policy Scenario 2 would constitute a default to London Plan Policy. The relevant London Plan policy (H16) would still produce a very positive effect against sustainability objective 10, however the London Plan policy would leave gaps with regard to local considerations which will make it more challenging to consistently secure positive impacts against objectives 11, 12, 15 and 18.								housing of all scenarios. In particular, the modified policy is likely to perform more strongly against It is no	It is not considered that												
											++ S	+ S	++ M			+ S			+ S			Objective 10 than either the adopted or	the preferred policy
3	Update Policy LP29 to set affordable housing requirement equivalent to 50% (Modified Policy) Modified Policy) Which sets the affordable housing requirements from Large Scale Shared Living developments equivalent to a 50% threshold. This represents a distinction from the version of the policy proposed at the Publication stage which set the requirement equivalent to the thresholds reflected in Policy LP23. As Policy LP23 is now proposed for modification (MM1) to amend those thresholds to mirror the thresholds set out in the London Plan, Policy LP29 is proposed for modification to clarify that a 50% threshold would apply to Large Scale Shared Living to reflect the unique viability capacity of this particular housing type (and not the corresponding London Plan thresholds). The modified policy would have a very positive effect against the sustainability objective on housing provision (10) and is considered to remain supportive of health and sustainable travel objectives. Whilst not significant enough to be reflected in the scoring outcomes, the modified policy is likely to perform more strongly against Objective 10 than either the adopted or unmodified version of the policy. This is because this scenario would result in greater affordable housing delivery relative to the adopted policy and the policy proposed at the Publication stage as a result of the difference in threshold								,	option requires any mitigation measures.													

6. Conclusion

- 6.1 This SA Addendum has been prepared to appraise the sustainability impacts of the modifications proposed by the Inspector appointed to undertake an independent examination of the WLPPR.
- 6.2 Each modification proposed by the Inspector has been assessed for its possible impact upon the objectives / outcomes determined through the Sustainability Appraisal carried out for the Publication (Regulation 19) version of the WLPPR.
- 6.3 In a majority of cases, the Main Modifications are general updates, clarifications or consequential changes that are necessary to enable the effective interpretation and implementation of the plan's policies. However, being simply updates or clarifications, in these cases it is considered there is no need to review the outcomes of the previous SA undertaken because there is no material change being proposed to the requirements of the policy. Consequently, modifications that fall within this category would not have any tangible impact upon the SA assessment of their respective policies.
- 6.4 A small number of Main Modifications have, however, been identified that had the potential to alter the performance of the relevant policy against Sustainability Appraisal objectives. These include Policy LP23 (Affordable Housing) and Policy LP29 (Housing with Shared Facilities). These policies have been re-appraised in the context of the relevant Main Modification with the rationale for the modification and consequential re-appraisal set out in Section 4.
- 6.5 The assessment of these proposed Main Modifications has found there would be no significant negative impacts against the sustainability objectives in the SA, and that the range of neutral and positive effects identified under the previous SA would remain.
- 6.6 The re-appraisals of Policy LP23 and LP29 have not resulted in a material change to the SA appraisal conclusions for either policy. Whilst small changes to the pathways through which the policies may lead to impacts upon objectives have been identified in these re-appraisals, these are considered to result in impacts that are either net positive (e.g. because the change improves the performance of the policy) or net neutral (e.g. because any potential disbenefit of the change would be compensated by its benefits). In either case, the changes are not considered to be significant enough to alter

- the overall appraisal outcomes, or timescale, identified against each objective in the SA Framework.
- 6.7 Overall, the proposed Main Modifications are not considered to significantly alter the overall findings or conclusions of the SA process undertaken at the Publication (Regulation 19) stage. The policies that form the WLPPR, inclusive of the modified policies, are considered to deliver a range of positive sustainability outcomes, and the modifications proposed are considered to have a net positive or net neutral impact on sustainability objectives or to otherwise provide greater clarity or effectiveness to the policies.

7. Appendix A – Sustainability Appraisal Framework for the Local Plan

The vision and objectives, each policy, Place-Based Strategies and site allocations presented in the draft Local Plan are assessed in terms of the overall balance of impacts on a scoped set of Sustainability Appraisal objectives as presented below.

Topic	Objective							
Pressure on the	1. Avoid loss of designated ecological sites, priority habitats and species.							
natural, built and historic environment	Protect and enhance the natural environment, geodiversity and biodiversity of the borough.							
	3. Conserve and where appropriate enhance heritage assets and their settings, and the wider historic environment including buildings, areas, structures, landscapes, townscapes, important views and archaeological remains.							
	4. Enhance the benefits to all from biodiversity an ecosystem services and establish and retain inter-connected multifunctional green infrastructure.							
Waste reduction and sustainable consumption	Minimise consumption of natural, particularly virgin non-renewable, resources and energy							
of resources	6. Minimise the generation of waste in accordance with the principles of the resource efficiency hierarchy.							
Climate change and air	7. Maintain and improve air quality							
quality	8. Promote renewable and low carbon energy generation							
	Minimise flood risk in the borough and elsewhere and promote the use of SuDS							
Population and household growth and housing demand and supply	10. Provide more housing opportunities for Wandsworth residents and workers							
Access to essential community services	11. Ensure people have access to essential community services and facilities including open space							
Pockets of deprivation	12. Reduce poverty, social exclusion and health inequalities							
and social exclusion	13. Ensure equality for everyone regardless of disability, age, race, ethnicity, sexuality, religion or belief							
	14. Address Council aspirations within priority neighbourhoods							
Public health	Protect and improve public health							
	16. Reduce the impact of noise							
Traffic Congestion and	17. Encourage growth of sustainable transport							
public transport infrastructure	18. Reduce the need to travel							

Business and	19. Provide employment space to meet the borough's needs
Employment	20. Ensure people have access to suitable employment opportunities