

Wandsworth Local Plan Partial Review (WLPPR)

Schedule of Proposed Main Modifications to the Publication Local Plan

November 2025

Background

The following table is a schedule of Proposed Main Modifications that have been identified by the Inspector (Graham Wyatt BA (Hons) MRTPI) appointed by the Secretary of State to oversee the Independent Examination of the Wandsworth Local Plan Partial Review (WLPPR).

This Schedule of Proposed Main Modifications has been made available for the purposes of public consultation from 26 November 2025 until 11:59pm on 14 January 2026. The Council has also published an addendum to the Sustainability Appraisal and an addendum to the Habitat Regulations Assessment for the purposes of public consultation.

Main Modifications are proposed changes to the [version of the Local Plan Partial Review](#) that the Council submitted to the Secretary of State in April 2025. These changes will affect the ‘soundness’ and/or ‘legal compliance’ of the plan. The changes being consulted on have been proposed by the Planning Inspector as part of the examination process. The changes proposed may be necessary to enable the Local Plan Partial Review to be formally adopted.

This consultation is **only** on the Inspector’s proposed Main Modifications, and the published Sustainability Appraisal and Habitat Regulations Assessment, and not on matters relating to other aspects of the Local Plan Partial Review which have already been considered by the Inspector during the examination process and hearing sessions. Any representations received that do not relate to the Main Modifications may not be forwarded to the Inspector.

Responses to the consultation can be made:

- By email to wandsworthplanningpolicy@richmondandwandsworth.gov.uk; or
- By post to Spatial Planning and Design, Place and Growth Directorate, Wandsworth Town Hall, Wandsworth High Street, SW18 2PU

Please note, responses must be accompanied by your name, the name of your organisation (where relevant) and your contact address. Your response to the consultation will not be confidential and will be published alongside your name / organisation. Your contact details and other personal information will not be published.

Anonymous and late responses will not be accepted.

Duly made responses to the consultation will be sent to the Inspector who will consider them before making their final recommendations on the Local Plan Partial Review.

Further information on the Main Modifications consultation, including links to other consultation documents and an optional response form, can be found on the Council’s website at [Local Plan Partial Review: Examination - Wandsworth Borough Council](#). Physical copies of the consultation materials are also available at Wandsworth Town Hall and the Borough’s main libraries (Balham, Battersea, Putney, Roehampton, Tooting and Wandsworth Town) during normal opening hours.

How to use this document

- The items below are set out in the order of the Local Plan Partial Review, as identified under the heading ‘Policy Reference’. The Proposed Main Modifications take the format that proposed additions to the text are recorded in highlighted and underlined text, and proposed deletions are recorded with a highlight and strikethrough. For example: This text is to be retained and this text is to be added ~~but this text is to be deleted~~.
- Policy and Paragraph Numbers are those set out in the [Publication \(Regulation 19\) Local Plan](#) published for consultation on 13 January 2025 (Submission Document SD001).

Modification Reference	Policy Reference	Policy or Paragraph Number	Proposed Modification	Reason for Modification
MM1	LP23 (Affordable Housing)	Part D	<p>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.</p> <p>The threshold for affordable housing on gross residential development is:</p> <p>a. a minimum of 35 45%; or</p> <p>b. 50% for public sector land where there is no portfolio agreement with the Mayor; or</p> <p>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</p> <p>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.</p> <p>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.</p> <p>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</p>	<p>This modification addresses concerns raised in representations and at the hearing sessions about the general conformity of Policy LP23 with the London Plan and instead aligns with London Plan Policies H4 and H5 with respect to the applicable thresholds and circumstances in which a late-stage review will be applied.</p>
MM2	LP23 (Affordable Housing)	Paragraph 17.11	<p>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 reprovion 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.</p>	<p>In response to representations, this modification would provide additional clarity over the interpretation of the phrase 'net uplift' in the context of Policy LP23</p>

Modification Reference	Policy Reference	Policy or Paragraph Number	Proposed Modification	Reason for Modification
MM3	LP23 (Affordable Housing)	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), <u>unless at least 15% of the units would be provided as affordable housing on-site.</u>	These modifications 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. These modifications would establish an equivalency principle between on-site and financial contributions to improve the effectiveness of the policy.
MM4		Paragraph 17.14	For the purposes of Policy LP23, 'small sites' are those which deliver between 1 and 9 dwellings (gross). <u>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.</u> All small sites will be required to make a financial contribution of £50,000 per gross dwelling, subject to viability. <u>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 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</u> contributions will be indexed annually in line with the Community 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.	
MM5	LP23 (Affordable Housing)	Paragraph 17.17	Intermediate housing within the borough includes Shared Ownership and London Living Rent. <u>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.</u> 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.	In response to the plan-making reforms which may change the role of Supplementary Planning Documents where the affordability criteria is normally referred to, this modification inserts this reference directly within the supporting text of the plan.

Modification Reference	Policy Reference	Policy or Paragraph Number	Proposed Modification	Reason for Modification
MM6	LP23 (Affordable Housing)	Paragraph 17.18	<p>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% 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. 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</p>	<p>For consistency with MM1, modifications to Paragraph 17.18 would clarify the application of thresholds and review mechanisms.</p> <p>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.</p>
MM7	LP23 (Affordable Housing)	Paragraph 17.20	<p>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 subsidy will be included in the Affordable Housing SPD and any successor document.</p>	<p>In response to representations, the 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.</p>

Modification Reference	Policy Reference	Policy or Paragraph Number	Proposed Modification	Reason for Modification
MM8	LP23 (Affordable Housing)	Paragraph 17.23	<p>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</p>	<p>In response to representations, the 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.</p>
MM9	LP23 (Affordable Housing)	Paragraph 17.24	<p>All viability tested applications, and schemes which have been re-submitted 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 agreed by the Council.</p>	<p>In response to representations, the 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.</p>

Modification Reference	Policy Reference	Policy or Paragraph Number	Proposed Modification	Reason for Modification
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. <u>Other than where agreed through the Viability Tested Route</u> , the Council will strongly resist any development which provides less than a policy compliant offer of affordable housing on site	In response to representations, the 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.
MM11	LP24 (Housing Mix)	Part E.	<i>[New bullet point]</i> <u>5. In the case of specialist forms of housing falling within Use Class C3, the particular need for that form of housing where this is shown to differ to the preferred housing mix.</u>	In response to representations, the 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.
MM12	LP28 (Purpose Built Student Accommodation)	Part A.1.	<u>Is proposed on a site which is not suitable for conventional housing</u> <u>Would not compromise a site's capacity to meet the Borough's need for conventional dwellings:</u>	The modification would clarify the meaning of Policy LP28 with respect to Part A.1. and create consistency with similar criteria within the development plan and to avoid unduly restricting the ability for Purpose-Built Student Accommodation to come forward to sites that are unsuitable for conventional housing unless this would compromise a site's capacity to meet the Borough's need for conventional dwellings.
MM13	LP28 (Purpose Built Student Accommodation)	Paragraph 17.44	In <u>exceptional</u> circumstances where a student housing development is considered <u>appropriate proposed</u> on a site which could accommodate some conventional housing <u>in a separate block</u> , the equivalent level of affordable housing as required by Policy LP23 <u>should may instead</u> be provided as a separate block on the site as part of the scheme and phased accordingly	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.
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 <u>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.</u> 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 <u>conventional housing on the site, the most up to date evidence on the need for student housing and conventional</u>	This modification provides 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.

Modification Reference	Policy Reference	Policy or Paragraph Number	Proposed Modification	Reason for Modification
			housing, and the extent to which each need is being met within the Borough and across London, having regard to the Council's most up to date Authority Monitoring Report and GLA monitoring reports.	
MM15	LP28 (Purpose Built Student Accommodation)	Paragraph 17.43	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 student housing. More guidance will be set out in the Affordable Housing SPD and any successor document. Proposals for student accommodation should ensure that this financial contribution is prioritised	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. The modification would establish a clearer prioritisation between the two.
MM16	LP28 (Purpose Built Student Accommodation)	Part A.8.	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;	In response to representations, the 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 concern raised by some representors that safeguarding considerations restrict the ability to make certain facilities available to the public.
MM17	LP28 (Purpose Built Student Accommodation)	Part B	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 housing need; or 2. The loss of student accommodation would be solely at ground floor level; and 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)	The modification would make it clearer how proposals resulting in the loss of existing student accommodation will be considered, improve internal consistency and apply clearer and better-defined tests.
MM18	LP29 (Housing with Shared Facilities)	Part D.3.	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	In light of MM1, this modification would clarify that large-scale purpose built shared living proposals will be subject to an affordable housing contribution equivalent to 50% of units

Modification Reference	Policy Reference	Policy or Paragraph Number	Proposed Modification	Reason for Modification
			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)	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.
MM19	LP30 (Build to Rent)	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 low cost social rented housing 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	<p>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.</p> <p>It would also substitute the term 'low cost rented' with 'social rented' to resolve internal inconsistency.</p>
MM20	LP31 (Specialist Housing for Vulnerable People and Older People)	Part A.	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, the 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.
MM21	LP31 (Specialist Housing for Vulnerable People and Older People)	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.	The modification is required for consistency with MM20