



Wandsworth Council

Chief Executive's Group
Town Hall Wandsworth High Street
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Planning Policy Consultation Team
Planning Directorate – Planning Policy
Division
Ministry of Housing, Communities and Local
Government
Floor 3, Fry Building
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Sent via email

Dear Rt Hon Angela Rayner MP, Secretary of State for Housing, Communities and Local Government,

RE: 2024 NPPF Consultation

I am pleased to present you with our response to the 2024 NPPF consultation which seeks views on the new Labour government's approach to revising the National Planning Policy Framework. Wandsworth Borough Council welcome the proposals for the revised NPPF, and we are particularly encouraged to see that housebuilding is a high priority for the new government.

Housing

The Council is heartened to see that planning reform aimed at increasing housebuilding is a high priority in this consultation and we are pleased with the recognition of the critical role that local government plays in planning for the houses our communities need, and particularly the critical need to drive up delivery of genuinely affordable, social housing. We agree with the sentiment in the deputy Prime Minister's letter to councils dated 31 July 2024 that the national housing need cannot be met without planning for growth on a larger than local scale. Our Council has a strong track record of delivering growth at scale and consistently outperforms its London Plan Target – for us to continue delivering the housing our residents need, it is important that local strategies remain ambitious but credible.

Importantly, Wandsworth Council are broadly in favour and welcome the reforms aimed at increasing the supply of housing, including to reverse the damaging changes made by the previous Government to the NPPF in 2023, and the new, mandatory standard method for assessing housing need, as presented in the consultation. We believe these reforms will provide certainty to local authorities and, over time, will result in universally higher housing delivery at a scale commensurate with the housing crisis. However, we urge the Government to work with the GLA and London Boroughs to consider the implications in London specifically, where local authorities inherit capacity-based

housing targets from the London Plan. The Council strongly supports the continued role of the London Plan in taking an evidence-driven, capacity-based approach for distributing London's need to individual Boroughs. For Boroughs like Wandsworth, this approach helps ensure housing targets are ambitious but credible and allows us to focus our full attention on working efficiently with developers and registered providers to increase housing supply of the right types, tenures and locations in Wandsworth.

The Council strongly supports proposed changes to the NPPF which emphasise the importance of social rented housing. In line with the Government's ambitions, Wandsworth Council is currently undertaking a partial review of our local plan which will increase the delivery of social housing, including seeking contributions from small sites, and amending the tenure split of affordable units delivered in favour of social rent, which is in line with the Government's aim to maximise delivery of new social rented units. In light of our ambitions, we would support a further review of paragraph 65 which currently seeks to limit the ability of local authorities to seek affordable housing contributions from small sites (10 units or less). Our emerging evidence indicates that contributions from small sites would not render the majority of schemes unviable and as such a policy requiring appropriate contributions would be achievable. This policy change would help us support those in the greatest need in our Borough and align with the Government's ambitions to drive up the delivery of genuinely affordable housing. In light of this, we would like to take this opportunity to urge Government to consider the use of more explicit wording in any policy amendments to contribute to the delivery of social rented homes specifically.

Wandsworth Council welcome the Government's plans to deliver an increase in affordable housebuilding and the proposed plans to introduce rent stability for councils and housing associations to enable borrowing for and investing in new and existing homes, which in turn will help us better support our residents. We would welcome more information on these proposals and an opportunity to engage in positive dialogue in due course.

Plan-Led System

The Council strongly agrees with Government that the plan-making system remains the best way of planning for growth and environmental enhancement. Local Plans help give certainty and stability to local people and developers and reconcile between competing needs. We recognise that up to date and ambitious local plans are vital to delivering the scale of housing and infrastructure required. However, we encourage the Government to consider whether changes to national policy on the 5-year housing land supply could lead to situations where recently adopted local plans are considered almost immediately out of date, and whether this would result in an increase in unplanned development which is non-compliant with other areas of policy such as design and sustainability. The Council would support measures to ensure that plans produced within the last five years and found legally compliant and sound by the Planning Inspectorate with an agreed 5-year housing land supply at the time of adoption are considered robust, and an indication that the authority has undertaken an adequate assessment of the housing requirements of that area.

We are encouraged by the proposals to amend wording on the presumption in favour of sustainable development which will protect local planning authorities against the abuse of the presumption by developers looking to bring forward low-quality and potentially unsustainable development, particularly the emphasis placed on ensuring development must deliver appropriate affordable housing. We would encourage the Government to

consider ways in which the importance of all housing developments maximising the delivery of affordable housing can be enshrined in policy wording. Furthermore, the current presumption in favour of sustainable development focusses on overall completions. The development process is largely outside of a planning authority's control once permission has been granted. We would support measures to place an additional focus on the granting of permissions and the embedding of more robust mechanisms to ensure developers deliver on building out extant permissions. The Council would also encourage the Government to work with local authorities to hold developers to account and ensure that planning permissions are implemented swiftly and effectively.

Public Service Infrastructure

Access to sufficient and accessible public service infrastructure is a fundamental part of place-making and championing sustainable development. Wandsworth Council support the new Labour Government's ambition to take a vision-led approach to transport planning, promoting healthy communities and boosting provision of much needed facilities for early years childcare and post-16 education which is clarified in the proposed changes to Paragraph 99 in the NPPF.

Land Reform and Compulsory Purchase

Wandsworth Council would support measures to reform the market for land given that speculation in the land market remains a fundamental structural barrier to the efficient and rapid delivery of genuinely affordable housing, particularly on underutilised sites. We would support the Government going further as they consider their long-term reforms, to empower local authorities to lead the delivery of new homes by further reforming compulsory purchase rules to ensure land ceases to be transacted at inflated levels which are then used to negotiate down the amount of affordable housing delivered. We would support the ability for local authorities to use compulsory purchase powers where doing so would deliver a development that provides more than 50% affordable housing. We feel there should be clear guidance that sets out the conditions for compulsory purchase and greater clarity over what constitutes public interest. In this way, stronger powers for local authorities to acquire and bring forward land will be a fundamental tool to addressing the housing crisis, providing certainty over delivery, and tackling stalled sites, while setting a high threshold for affordable housing and other public benefits and amenities.

Climate Change

Wandsworth Council recognise the climate crisis and have committed to becoming carbon neutral as an organisation by 2030 and as a Borough by 2043. To this end, we support proposed changes to the NPPF to give greater support to renewable and low carbon energy. National Policy should absolutely support renewable and low carbon energy and Wandsworth Council encourage the Government to take a practical approach to how this will manifest in policy to reflect the nuances of individual circumstances at a local scale.

Wandsworth Council believe National Policy should support retrofit for climate resilience and not underestimate the impact of domestic retrofit in the journey to net zero. We would support National Policy taking a retrofit first approach to development, rather than the demolition and redevelopment of sites. We also urge the Government to consider reforming building standards, which currently stop short of requiring the standards needed to deliver climate change mitigation and adaptation at the pace

required to achieve net zero ambitions. We were disappointed with the Written Ministerial Statement issued by the previous Government which sought to prevent local planning authorities from setting energy efficiency standards in excess of Building Regulations, despite it being lawful to do so. We believe this constrained the ambition of local authorities in tackling the impacts of climate change and would urge the Government to reverse this narrative.

Local Authority Resourcing

Wandsworth Council are extremely supportive of the general desire to inject additional resource into the planning system, especially considering the potential increased workload for local authority planning departments arising from revisions to the NPPF. We welcome the reassurance that councils asked to increase housing numbers will receive financial support to undertake the additional work arising from potential changes such as the addition of a 5% buffer to 5-year housing land supplies. In particular, proposals to substantially increase application fees, including the ability for local authorities to set fees which genuinely recover the full costs involved in determining planning applications, are strongly welcomed.

As part of this, we would like to also take this opportunity to urge the Government to consider the additional local authority resource implications of further reforms, including planned digitalisation of the planning system. In the coming years, local authorities will need to undertake mass upskilling of their planning workforce to adapt to new approaches, and to use digital tools efficiently and responsibly. We would urge the Government to invest in the development of both planners and the digital and other tools required in planning departments to help free up the time of planners for more pertinent tasks. Public Consultation, for example, is one of the biggest pressures on planners' time in local authorities during the plan-making process. Currently, there is no solution on the market to categorise and analyse a large number of extremely complex responses from the public, leaving planners to use a variety of other, often inefficient, methods to carry out the proper analysis of consultation responses. Adequately resourcing local authority planning departments is imperative as we work together to combat the housing crisis, climate crisis and rise to the myriad other challenges that the planning system needs to address in the 21st century.

We look forward to working with Government to scope the nature of wider reforms to the planning system, including through the forthcoming Planning and Infrastructure Bill, and further reforms to the plan-making process.

Yours Sincerely,

Cllr Simon Hogg
Leader of Wandsworth Borough Council

cc

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