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# **R22 Local Plan Matter 3: Issue 2 Addendum**

## **Camden Local Plan**

St George West  
London Limited

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18<sup>TH</sup> MARCH 2026

# 1 Addendum

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- 1.1 On behalf of St George West London Limited ('St George'), part of the Berkeley Group, Quod submits this hearing statement addendum in respect of Matter 3: Meeting Camden's Housing Needs. This hearing statement responds to Matters Issues and Questions (MIQs) (ED04) issued by the Inspector on 30th January 2026.

## **Issue 2: Whether the Plan will be effective in delivering affordable housing to meet the Borough's needs and in providing an appropriate mix and standard of homes for different groups in the community during the Plan period?**

- 1.2 Following an examination of the Wandsworth Local Plan Partial Review<sup>1</sup>, Inspector Graham Wyatt BA (Hons) MRTPI issued his report<sup>2</sup> on 20<sup>th</sup> February 2026, and the policies were adopted by the Council on 4th March 2026.

- 1.3 The Inspector's conclusion and recommendation is set out at paragraph 42.

*42. The Plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explained in the main issues set out above.*

- 1.4 The Council proposed affordable housing Policy LP23 which promoted an affordable fastrack threshold of 45%.

- 1.5 In not finding this policy sound, the Inspector part justified his decision on two important matters at paragraph 22 and 23. These are replicated below.

*22. To inform the WLPPR, the Council prepared a Whole Plan Viability Assessment (SD022) which tested a range of affordable housing requirements against 48 site typologies. In response to concerns regarding general conformity, the Council provided a Whole Plan Viability Assessment Addendum (SD043) which tested a further six sites across the borough. These assessments found that a number of sites, including those with lower existing land values and those in higher sales value areas, can viably deliver 45% affordable housing. Conversely, sites with very high existing land values cannot meet even the 35% threshold.*

*23. However, the Greater London Authority (GLA) provided its own assessment of past housing delivery across the Borough<sup>3</sup> and concluded that it only achieved an average of some 30% of affordable housing between 2020 - 2025. Therefore, requiring 45% affordable housing on private, non-industrial land would serve to discourage applicants from following the Fast Track Route (FTR) and would in many cases be unachievable. Moreover, the higher threshold*

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<sup>1</sup> File Ref PINS/H5960/429/11

<sup>2</sup> Appendix 1 attached

<sup>3</sup> Rep 109-001, Greater London Authority, 23 October 2025

set out within the submitted plan could in turn impact on the delivery of affordable housing and therefore, the effectiveness of the plan. (our emphasis)

1.6 Inspector Wyatt’s conclusions are reasonable. Where a local authority proposes an affordable housing policy threshold, in excess of what affordable housing has been delivered year on year, he rightly found that it:

1.6.1 “would serve to discourage applicants from following the Fast Track Route (FTR)”

1.6.2 “would in many cases be unachievable”

1.6.3 “could in turn impact on the delivery of affordable housing”; and

1.6.4 “therefore, the effectiveness of the plan”

1.7 These matters are fundamental to the soundness of a plan. These principles apply in Camden.

1.8 Camden Council’s evidence base demonstrates that over recent years, the Council has failed to achieve either a 35% or 50% affordable threshold.

1.9 The delta between actual delivery and the threshold in Camden (38% to 23%) is greater than in Wandsworth (15%). Table 1-1 below demonstrates this.

Table 1-1: Camden Affordable Housing Delivery

Year	Housing Target	Net Homes Affordable Camden Housing Delivery <sup>4</sup>	Affordable %
2019/20	1038	148	14%
2020/21	1038	117	11%
2021/22	1038	120	12%
2022/23	1038	1	0%
2023/24	1038	242	23%
		Average	12%

1.10 This demonstrates that, for Camden, a 35% or 50% affordable housing threshold would serve to discourage applicants from following the Fast Track Route (FTR); would in many cases be unachievable; could in turn impact on the delivery of affordable housing and therefore, the effectiveness of the plan.

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<sup>4</sup> SD13, Council AMR Table 13



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# Report to The London Borough of Wandsworth

by **Graham Wyatt BA (Hons) MRTPI**

an Inspector appointed by the Secretary of State

Date 20 February 2026

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Planning and Compulsory Purchase Act 2004 (as amended)

Section 20

## **Report on the Examination of the Wandsworth Local Plan Partial Review**

The Plan was submitted for examination on 30<sup>th</sup> April 2025

The examination hearings were held between 4<sup>th</sup> and 6<sup>th</sup> November 2025

File Ref PINS/H5960/429/11

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**Abbreviations used in this report**

Wandsworth Local Plan Partial Review	WLPPR
The London Plan 2021	LP
Fast Track Route	FTR
Greater London Authority	GLA
Late Stage Review	LSR
National Planning Policy Framework	NPPF
Viability Tested Route	VTR
Sustainability Appraisal	SA
Strategic Environment Assessment	SEA
Purpose-Built Student Accommodation	PBSA

## **Non-Technical Summary**

This report concludes that the Wandsworth Local Plan Partial Review provides an appropriate basis for the planning of the London Borough of Wandsworth, provided that a number of main modifications are made to it. The Council of the London Borough of Wandsworth has specifically requested that I recommend any main modifications necessary to enable the Plan to be adopted.

Following the hearings, the Council prepared a schedule of the proposed main modifications and, where necessary, carried out a sustainability appraisal and habitats regulations assessment of them. The Main Modifications were subject to public consultation over a seven-week period. In some cases, I have amended their detailed wording and/or added consequential modifications where necessary. I have recommended their inclusion in the Wandsworth Local Plan Partial Review after considering all the representations made in response to consultation on them.

The Main Modifications can be summarised, amongst other things, as follows:

- Amending Policy LP23: Affordable Housing, so that it aligns with the London Plan 2021 in relation to the threshold for affordable housing on gross residential development and thus is reduced from 45% to 35% for private, non-industrial land.
- Amending Policy LP23: Affordable Housing, so that developments that follow the Fast Track Route are not the subject of a late stage review.
- Amending Policy LP28: Purpose-Built Student Accommodation, which may be allowed on housing-appropriate sites, providing it does not compromise the site's capacity to meet the borough's conventional housing need.
- Amending Policy LP31 (Specialist Housing for Vulnerable People and Older People) so that proposals to re-use or re-develop specialist housing 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.

A number of other main modifications are also recommended to ensure that the plan is positively prepared, justified, effective and consistent with national policy and the London Plan.

## Introduction

1. This report contains my assessment of the Wandsworth Local Plan Partial Review (WLPPR) in terms of Section 20(5) of the Planning and Compulsory Purchase Act 2004 (as amended). It considers whether the Plan is compliant with the legal requirements and whether it is sound. Paragraph 35 of the National Planning Policy Framework 2023 (NPPF) states that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.
2. As the WLPPR reached Regulation 19 stage on 13<sup>th</sup> January 2025, in accordance with the transitional arrangements as set out at paragraph 234 of the NPPF December 2024, the WLPPR has been examined under the December 2023 NPPF.
3. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound Plan. The WLPPR, submitted in April 2025, is the basis for my examination. It is the same document that was published for consultation between 13 January and 24 February 2025.

## Main Modifications

4. In accordance with section 20(7C) of the 2004 Act the Council requested that I should recommend any main modifications [MMs] necessary to rectify matters that make the Plan unsound and thus incapable of being adopted. My report explains why the recommended MMs are necessary. The MMs are referenced in bold in the report in the form **MM1**, **MM2** etc, and are set out in full in Appendix A attached to this report.
5. Following the examination hearings, the Council prepared a schedule of proposed MMs. The MM schedule was subject to public consultation for seven weeks from 26 November 2025 to 14 January 2026. I have taken account of the consultation responses in coming to my conclusions in this report.

## Policies Map

6. The WLPPR seeks to update only six policies in the adopted Wandsworth Local Plan (2023-2038). These policy proposals have no impact on the designations and site allocations featured on the Local Plan Policies Map. As a result, the submitted WLPPR did not contain any proposed alterations to the adopted policies map for the area.

## Context of the Plan

7. Wandsworth is one of the largest inner London boroughs, stretching from central London at Nine Elms to the edge of Richmond Park, with one of the longest riparian frontages to the River Thames. The borough includes a diverse range of communities and many distinct neighbourhoods. The five town centres (Balham, Clapham Junction, Putney, Tooting and Wandsworth), the Nine Elms Opportunity Area and nine local centres provide points of focus and identity for the communities that make up the borough.
8. A third of the borough's land area is occupied by residential properties, many within one of the 46 conservation areas. A quarter of the borough's land area is open space, much of which is made up of large heaths and commons with significant pressure on housing availability and land for employment.

### **Scope of the Plan**

9. The WLPPR submitted for examination is a partial review of the Wandsworth Local Plan 2023-2038. It is important to be clear to the extent of the partial review for the purposes of the examination. The following Policies are subject to review:

Policy LP23: Affordable Housing (Strategic Policy)

Policy LP24: Housing Mix

Policy LP28: Purpose-Built Student Accommodation

Policy LP29: Housing with Shared Facilities

Policy LP30: Build to Rent

Policy LP31: Specialist Housing for Vulnerable People and for Older People

10. There are also consequential changes to the supporting text for the Policies listed above, which are set out in Section 3 (Table 1) of the WLPPR.

### **Public Sector Equality Duty**

11. I have had due regard to the aims expressed in S149 of the Equality Act 2010. This, amongst other matters, sets out the need to advance equality of opportunity and foster good relations between people who share a protected characteristic and people who do not share it. In my consideration of several matters during the examination, this included meeting the housing needs of the elderly, vulnerable people, and people with disabilities, and the provision of improved, and safe access to, open space, recreation, health, education, leisure, and community facilities (Policies LP23 and LP31).

### **Assessment of Duty to Co-operate**

12. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by section 33A in respect of the Plan's preparation.
13. The Council's submission duty to co-operate statement (SD009) sets out the bodies with whom the Council has engaged during the development of the WLPPR and the issues discussed. These bodies included all organisations prescribed by the 2012 Regulations and statements of common ground with many of these bodies provide further detail on how that engagement has been conducted and how it has influenced the content of the Plan. I am satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has therefore been met.

### **Assessment of Other Aspects of Legal Compliance**

14. The WLPPR has been prepared in accordance with the Council's Local Development Scheme, March 2025 (SD024).
15. Consultation on the WLPPR and the MMs was carried out in compliance with the Council's Statement of Community Involvement (SD023a). The Council has carried out a Sustainability Appraisal (SD003) of the WLPPR, which incorporated the requirements of Strategic Environment Assessment (SEA). Although the SA and SEA are separate processes, the SEA requirements are appropriately incorporated into the SA and fully explained. The Council also prepared a report of the findings of the appraisal and published it along with the plan and other submission documents under Regulation 19. The appraisal was updated in November 2025 to assess the main modifications.

16. The Habitats Regulations Assessment, January 2025 as updated by the November 2025 addendum, sets out why an Appropriate Assessment is not necessary. Natural England were consulted on the screening opinion and through the Statement of Common Ground (SOCG02), raised no objection to its conclusion.
17. The WLPPR, taken as a whole, includes policies designed to secure that the development and use of land in the local planning authority's area contributes to the mitigation of, and adaptation to, climate change.
18. In conclusion, the WLPPR complies with all relevant legal requirements, including the 2004 Act (as amended) and the 2012 Regulations. Overall, I am satisfied that the SA, incorporating the SEA, and Habitats Regulations Assessments comply with the necessary legal requirements and associated national guidance.

## **Assessment of Soundness**

### **Main Issues**

19. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings, I have identified one main issue upon which the soundness of this plan depends. This report deals with this main issue. It does not respond to every point or issue raised by representors. Nor does it refer to every policy, policy criterion or allocation in the Plan.

**Main Issue – Whether the policies set out within the WLPPR are positively prepared, justified, effective, consistent with national policy, and in general conformity with the London Plan.**

### **Policy LP23: Affordable Housing**

20. Policy LP23 seeks to maximise the delivery of affordable housing across the borough. It is evident that Wandsworth has an acute need for affordable housing and according to its Housing Needs Assessment (SD020), some 23,601 of the borough's supply of 26,315 homes need to be affordable to meet local needs by 2038, of which 17,223 are required to be social rented. In response to this need, the submitted plan sought to increase the level of affordable housing on private, non-industrial sites from 35% to 45% for developments following the Fast Track Route (FTR)<sup>1</sup>, whilst maintaining a 50% threshold for public and industrial land. In addition, the submitted plan sought a Late Stage Review (LSR) of developments that followed the FTR, and to alter the housing tenure split so that 70% social rented (minimum) and 30% intermediate housing (maximum) are provided.
21. Policy H5 of the London Plan states that the threshold for affordable housing on gross residential development is set at 35% for private non-industrial land which will only be subject of an Early Stage Review where an agreed level of progress on implementation is not made within two years of the permission being granted. Thus, the Council's proposed review of Policy LP23 to require a threshold of 45% affordable housing on private non-industrial land would not be in general conformity with the London Plan (LP).

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<sup>1</sup> Developments that provide at least 35% affordable housing (50% on public/industrial land) are exempt from Late Stage Review.

22. To inform the WLPPR, the Council prepared a Whole Plan Viability Assessment (SD022) which tested a range of affordable housing requirements against 48 site typologies. In response to concerns regarding general conformity, the Council provided a Whole Plan Viability Assessment Addendum (SD043) which tested a further six sites across the borough. These assessments found that a number of sites, including those with lower existing land values and those in higher sales value areas, can viably deliver 45% affordable housing. Conversely, sites with very high existing land values cannot meet even the 35% threshold.
23. However, the Greater London Authority (GLA) provided its own assessment of past housing delivery across the Borough<sup>2</sup> and concluded that it only achieved an average of some 30% of affordable housing between 2020 - 2025. Therefore, requiring 45% affordable housing on private, non-industrial land would serve to discourage applicants from following the Fast Track Route (FTR) and would in many cases be unachievable. Moreover, the higher threshold set out within the submitted plan could in turn impact on the delivery of affordable housing and therefore, the effectiveness of the plan.
24. Furthermore, the GLA's Planning and Housing Practice Note, Accelerating Housing Delivery, December 2024 identifies that those small number of boroughs that have housing policies with a site-specific requirement that is higher than the 35% private land threshold, may require more applicants to follow the Viability Tested Route (VTR), even where the application meets the relevant LP criteria for following the FTR. This in turn can disincentivise applicants from following the FTR, slows down the planning process, and requires additional resources to assess the application. Moreover, the GLA state that the average proportion of affordable housing secured from referable applications that followed the FTR has been consistently higher than those that followed the VTR<sup>3</sup>. Whilst the Council presented its own analysis (SD013) on trends in affordable housing delivery, and there is some evidence that development in Wandsworth shows greater capacity for higher levels of affordable housing delivery than in some other London Boroughs covered by the GLA's evidence, the higher threshold as set out with the submitted plan is not justified and would be counterproductive, materially impacting on the delivery of much needed homes in the borough.
25. Notwithstanding this, the proposed changes to the tenure mix (70% social rent and 30% intermediate) would be justified and in general conformity with the LP, but only where this is based upon the 35% affordable housing threshold for private, non-industrial land. Where the proposed tenure mix is based upon the 45% affordable housing threshold, this is likely to push more applicants towards using the VTR and not the FTR, which again presents the inherent issues already discussed.
26. In response to these matters, and to ensure that the plan is in general conformity with the LP, **MM1** amends Policy LP23 to reflect the 35% affordable housing requirement for gross residential development on private, non-industrial land as established in the LP. For reasons of clarity and effectiveness, it also removes reference to the Council's FTR and replaces it with a reference to Policy H5 of the LP. In addition, it removes the requirement for a LSR and the need for a viability assessment for developments that follow the FTR.

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<sup>2</sup> Rep 109-001, Greater London Authority, 23 October 2025

<sup>3</sup> See footnote 9 of GLA Housing Practice Note, December 2024

27. For effectiveness, **MM2** provides additional clarity over the interpretation of 'net uplift' to ensure that the loss of affordable housing will only be acceptable where applicants can demonstrate the re-provision of at least the equivalent amount of affordable housing overall, by number of dwellings and/or habitable rooms.
28. **MM3** resolves an anomaly in Policy LP23 whereby developments between one and nine residential dwellings would potentially be expected to provide a financial contribution towards affordable housing irrespective of whether the development proposed to deliver affordable housing units on-site. This would establish an equivalency principle between on-site and financial contributions to ensure the effectiveness of the policy. Likewise, **MM4** is a consequential modification to the supporting text of Policy LP23 to ensure that it reflects **MM3**.
29. For effectiveness, and to ensure consistency with national policy which will remove the role of Supplementary Planning Documents, **MM5** modifies the supporting text to Policy LP23 so that the Council's Intermediate Housing Policy is referred to. For consistency, a modification is required to the supporting text of LP23 through **MM6** to clarify the application of thresholds and review mechanisms as set out in MM1. The modification would also clarify the role of mid-stage reviews in relation to Policy LP23 and resolve inconsistencies between Part D.2 of the policy, Paragraph 17.18 of the supporting text, and the LP ensuring effectiveness.
30. For effectiveness, **MM7** provides 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. Likewise, **MM8** provides 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 has informed the proposal.
31. **MM9** modifies the interpretation of "re-submitted" in the context of paragraph 17.24 of the supplementary text, acknowledging that non-material amendment applications would not trigger additional early, mid or late-stage review mechanisms. This modification ensures that the Policy is effective and provides additional direction for decision makers. To ensure that developments provide the requisite amount of affordable housing, **MM10** clarifies that those developments seeking a lower threshold of affordable housing will only be agreed through the VTR ensuring that the policy is effective

#### **Policy LP24: Housing Mix**

32. Policy LP24 sets out the Council's preferred borough-wide housing mix for affordable and market housing. To ensure that the Policy is effective, **MM11** modifies Part E to allow proposals for specialist accommodation that fall within Use Class C3 to evidence a housing mix need that differs from the preferred housing mix set out in the policy.

#### **Policy LP28: Purpose-Built Student Accommodation**

33. Policy LP28 supports the development of purpose-built student accommodation (PBSA) across the borough to meet the needs of students as set out within the LP. However, given the significant pressures to deliver affordable housing, Policy LP28 A.1 sought a restrictive approach to such accommodation and restricted PBSA to sites which would not be suitable for conventional housing. However, for consistency across the plan, and to ensure that the Policy is effective and in general conformity with the

LP, **MM12** clarifies that PBSA would be considered acceptable on sites where it does not compromise the borough's need for conventional housing.

34. Given the borough's significant pressures to deliver conventional affordable housing, Policy LP28 requires PBSA to contribute towards conventional affordable housing in the form of a financial contribution. For effectiveness, **MM13** modifies the supporting text to Policy LP28 to 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. To align with MM12, **MM14** clarifies how Policy LP28 Part A.1. should 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. This modification ensures that the plan is effective.
35. **MM15** explains how the affordable housing requirements within Policy LP28 would support the FTR as set out in Policy LP23 and the LP. It also provides 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.
36. For effectiveness, **MM16** is required to modify Part A.8. of Policy LP28 to make it clearer that making student facilities available to the wider community will be subject to feasibility. It also acknowledges that safeguarding considerations could restrict the ability to make certain student facilities available to the wider public.
37. For effectiveness, **MM17** is required to provide direction to the decision maker as to how proposals that would result in the loss of existing PBSA should be considered. This includes the requirement to replace the loss of PBSA with other types of housing which has an identified need. This delivers consistency, applying clearer and better defined tests.

### **Policy LP29: Housing with Shared Facilities**

38. Policy LP29 requires large-scale purpose-built shared living schemes to make a financial contribution towards affordable housing and, in line with the LP, requires all schemes to follow the VTR. To ensure effectiveness and maintain consistency with MM1, **MM18** is required to clarify that large-scale purpose-built shared living schemes will be subject to an affordable housing contribution equivalent to 50% of units, rather than the thresholds set out in the modified Policy LP23.

### **Policy LP30: Build to Rent**

39. Policy LP30 requires Build to Rent developments to contribute towards affordable housing in line with Policy LP23 and provides for a cascade mechanism which prioritises the delivery of social rented housing. For effectiveness, **MM19** is required to make clear 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 LP. It would also substitute the term 'low cost rented' with 'social rented' to resolve inconsistency in the Plan.

### **Policy LP31: Specialist Housing for Vulnerable People and Older People**

40. For effectiveness, **MM20** explains 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. Likewise, **MM21** is a consequential modification that is required to ensure consistency with MM20.
41. Subject to the modifications I have identified, the overall approach of the WLPPR is consistent with the NPPF, and in general conformity with the LP in seeking to maximise the delivery of affordable housing, and PBSA, and providing for an acceptable housing mix across the borough.

### **Overall Conclusion and Recommendation**

42. The Plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explained in the main issues set out above.
43. The Council has requested that I recommend MMs to make the Plan sound and capable of adoption. I conclude that the Duty to Cooperate has been met and that with the recommended main modifications set out in the Appendix A, the WLPPR satisfies the requirements referred to in Section 20(5)(a) of the 2004 Act and is sound. My report covers the main issues that have led me to this conclusion.

*Graham Wyatt*  
Inspector

This report is accompanied by an Appendix containing the main modifications.

Modification Reference	Policy Reference	Policy or Paragraph Number	Proposed Modification
MM1	LP23 (Affordable Housing)	Part D	<p>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. 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><del>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.</del></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>
MM2	LP23 (Affordable Housing)	Paragraph 17.11	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,

			<p>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. <b>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.</b></p>
MM3	LP23 (Affordable Housing)	Part B.	<p>Developments delivering between 1 and 9 residential dwellings (gross) are required to provide a <b>financial</b> 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), <b>unless at least 15% of the units would be provided as affordable housing on-site.</b></p>
MM4	LP23 (Affordable Housing)	Paragraph 17.14	<p>For the purposes of Policy LP23, 'small sites' are those which deliver between 1 and 9 dwellings (gross). <b>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.</b></p> <p>All small sites will be required to make a financial contribution of £50,000 per gross dwelling, subject to viability. <b>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</b> <del>the</del> 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.</p>

MM5	LP23 (Affordable Housing)	Paragraph 17.17	<p>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.</p>
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 <del>Council's</del> Fast Track Route has a minimum threshold of either <del>45</del> <u>35%</u> or 50% by habitable room depending on the type of site. Fast-tracked applications that provide <del>between 45-50% affordable housing by habitable room, with</del> 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 <u>stage review where an agreed level of progress is not made.</u> <del>and late stage review, with a</del> Mid-stage reviews <u>may also be</u> applicable at the discretion of the Council <u>on large multi-phased developments.</u> <del>If an application provides 50% or more affordable housing by habitable room, with the specified tenure mix within the policy,</del> applicants will not be required to submit viability evidence at planning application stage or <del>be subject to a review mechanism, unless an agreed level of implementation is not made within two years of permission.</del> 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. <del>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.</del> Policy LP23 is aimed at fast-tracking applications that provide the threshold level of affordable housing, progressing applications more quickly and</p>

			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.
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 <b>both the Council and</b> Registered Providers at the earliest opportunity. <b>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.</b> 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. <b>Guidance on use of public subsidy will be included in the Affordable Housing SPD and any successor document.</b></p>
MM8	LP23 (affordable Housing)	Paragraph 17.23	<p><b>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,</b> 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. <b>Applicants should seek to evidence this through providing records of discussions, meetings or agreements that have taken place.</b> 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</p>

			and demonstrating a high standard of management). <b>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.</b> The onus will be on applicants to pay for any viability assessment if the proposal is not policy compliant and any cost of <b>an</b> 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.
MM9	LP23 (Affordable Housing)	Paragraph 17.24	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. <b>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.</b> Where reviews are required, these will be expected to follow the formula set out in the London Plan unless otherwise agreed by the Council.
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. <b>Other than where agreed through the Viability Tested Route,</b> the Council will strongly resist any development which provides less than a policy compliant offer of affordable housing on site.
MM11	LP24 (Housing Mix)	Part E.	<i>[New Bullet Point]</i> <b>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.</b>
MM12	LP28 (Purpose Built Student Accommodation)	Part A.1.	<del>Is proposed on a site which is not suitable for conventional housing</del> <b>Would not compromise a site's capacity to meet the Borough's need for conventional dwellings.</b>

MM13	LP28 (Purpose Built Student Accommodation)	Paragraph 17.44	In <del>exceptional</del> circumstances where a student housing development is considered <del>appropriate proposed</del> on a site which could accommodate some conventional housing <del>in a separate block</del> , the equivalent level of affordable housing as required by Policy LP23 <del>should</del> <del>may</del> be provided as a separate block on the site as part of the scheme and phased accordingly
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 <del>will be supported provided that they do not compromise a site's capacity for conventional housing</del> <del>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.</del> <del>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 up to date Authority Monitoring Report and GLA monitoring reports.</del>
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. <del>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).</del> <del>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.</del> <del>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.</del> <del>More guidance will be set out in the Affordable Housing SPD and any successor document.</del> <del>Proposals for student accommodation should ensure that this financial contribution is prioritised.</del>

MM16	LP28 (Purpose Built Student Accommodation)	Part A.8.	8. Can make facilities provided for student residents available to the wider community, <u>where feasible</u> , particularly where there is an acknowledged shortfall in such provision within the neighbourhood;
MM17	LP28 (Purpose Built Student Accommodation)	Part B.	<p>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: <u>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:</u></p> <ol style="list-style-type: none"> <li>1. The <u>loss of student accommodation housing would be replaced by another form of housing for which there is an identified need; priority housing need;</u> or</li> <li>2. The loss of student accommodation would be solely at ground floor level; and <ol style="list-style-type: none"> <li>a. The development would replace the ground floor student accommodation with <u>appropriate</u> active <u>ground floor town centre</u> uses <u>as defined in the glossary;</u> and</li> <li>b. The proposed <u>ground floor</u> uses would pass the sequential test for main town centre uses in accordance with Policy LP43 (Out of Centre Development)</li> </ol> </li> </ol>
MM18	LP29 (Housing with Shared Facilities)	Part D.3.	Provide a financial contribution towards the provision of affordable housing in the borough, equivalent to <u>the corresponding threshold level set out in Policy LP23(Affordable Housing) 50% of units</u> 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)
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 <u>low-cost social</u> 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 <u>genuinely affordable intermediate</u> rents to meet priority housing need in Wandsworth

MM20	LP31 (Specialist Housing for Vulnerable People and Older People)	Part A.	Where the loss <u>of</u> 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 <del>contribute to meeting</del> <u>deliver</u> another <u>form of priority</u> housing <u>for which there is an identified</u> need (including social rent)
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. <u>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.</u>