

LONDON PLAN – EXAMINATION IN PUBLIC

Matter 20: Small sites and small housing developments

WRITTEN STATEMENT LONDON BOROUGH OF WANDSWORTH

1. This statement has been prepared by the London Borough of Wandsworth, and it relates to Matter 20 (Small sites and small housing developments) only. It should be read in conjunction with Wandsworth Council's response to the London Plan consultation, submitted on 2 March 2018.
2. The Council welcomes the Panel of Inspectors' decision to examine the London Plan's approach to small sites and small housing developments. The London Borough of Wandsworth has an excellent track record in delivering large site developments within its borough to accommodate a growing population, in particular in the Nine Elms, Vauxhall, Battersea Opportunity Area, which has also included transport and social infrastructure. However, the Council is concerned that in contrast the small sites approach in the London Plan is not adequately justified and is not deliverable, in its own and other London boroughs.
3. The London Borough of Wandsworth's response in relation to the Panel's questions is as follows.

M20. Are the presumption in favour of small housing developments of between 1 and 25 homes in Policy H2 and the targets in Table 4.2 justified and deliverable and will the policy be effective?

4. In summary Wandsworth Council does not consider that the small housing developments presumption and targets are justified or deliverable. Evidence for this position is set out in the responses to the Panel's more detailed questions below.

a) Is the modelling of delivery from small sites in the SHLAA justified, including reliance on PTALs?

1 per Cent and 0.25 per Cent Assumptions

5. The model set out in the SHLAA is not justified. In particular, the assumption that 1 per cent each year of the houses in an area will be subject to growth is not justified anywhere in the London Plan or its evidence base, other than it providing 'a reasonable estimate' of the potential impact of the proposed policy changes in the draft London Plan' (para. 6.24 of the SHLAA (NLP/HOU/002)).
6. Likewise the 0.25 per cent increase assigned to conservation areas is not justified, other than that 'the scope for residential intensification will be more limited in these areas' (para. 6.28).
7. If these assumptions are to be used to plan for housing delivery in London, and set housing targets for individual boroughs that are large increases on current targets and

that will then be subject to the Housing Delivery Test and its potential consequences, clear evidence that they are appropriate should be provided.

8. Such evidence should address:
 - a. Viability at least at a borough level, so that targets set for individual boroughs are known to be achievable;
 - b. Viability in conservation areas; and
 - c. How viability affects the propensity for landowners to develop under the policy and achieve the 1 and 0.25 per cent assumptions. While developments were tested in the 'London Plan Viability Study Addendum Report' (NLP/VI/004) and were viable in 'most' cases (para, 7), this was a test of policy burden and not the propensity for development.

Reliance on PTAL

9. The SHLAA model treats all areas within PTAL 3–6 as the same, even though there are large differences in land values and desirability of the PTAL area at the upper end of this range.
10. More importantly there is no correlation between PTAL and capacity. To ensure delivery of these targets sustainably, the Mayor needs to ensure that London Plan implementation is phased with a corresponding increase in transport capacity, such as through it's partner TfL and other transport stakeholders. The Mayor also needs to ensure that increased capacity at train and tube stations already congested is delivered, as well as with the franchised train and bus operators and it is noted that suburban rail services will not be under TfL's control for the foreseeable future. If housing is expected to be delivered in advance of public transport improvements this will mean further strain on the transport network and making the justifications for car free development more difficult. More car journeys will be inevitable, reducing air quality even further. Whilst Policy T4D seeks to avoid adverse transport impacts and allow planning permissions to be contingent on the necessary infrastructure, this does not acknowledge or tie in with the unrealistic housing target and timeframe.
11. This should also be the subject of additional evidence in arriving at achievable small sites delivery targets for boroughs.

Residential Conversions

12. It is acknowledged that in London as a whole, additional dwellings created from the conversion of larger homes can be an important source of housing supply, making best use of available land. However at borough level, the extent to which conversion activity has already occurred, the potential impact on retaining a balanced housing stock offering a range of housing types and sizes to meet needs and demand, and on achieving mixed and balance communities should have been considered if further extensive house conversion are encouraged. Taking account of local circumstances and evidence, Wandsworth Council considers that the Mayor's approach to encouraging house conversions needs to be tempered to allow for flexibility at borough-level. The tight grain and/or small gardens in most of Wandsworth would

preclude extensions large enough to provide an additional unit of accommodation. The terraced houses in Wandsworth in the higher PTAL areas tend to have narrow frontages and no rear access, so would be difficult to achieve new units through extensions of development in the curtilage of a property. To reduce the threshold below which dwellings cannot be converted to flats in Wandsworth would not achieve the objective of part A 2) in this policy - retaining diversity of stock.

13. It is important to note that building strong communities, as advocated in Policy GG1, relies on a diversity of housing stock. Whilst Wandsworth recognises that large houses can be successfully converted to a mix of family-sized and smaller flats, smaller houses and maisonettes provide for a more affordable source of accommodation for families, extended families and adult sharers. Wandsworth's significant housing targets have been and will be delivered primarily in new developments of generally 1 and 2 bedroom units, without reliance on achieving smaller dwellings from conversions. In addition, the proportion as well as the absolute number of smaller houses and family sized flats would reduce to exclude families from the borough. A threshold approach to allowing conversion of larger housing would be more appropriate, tied to a requirements to retain at least one family-sized dwelling in any conversion. This approach has been upheld in Wandsworth.

b) Is it realistic to expect the small sites target to be achieved in the outer London Boroughs?

14. No comment.

c) Has adequate consideration been given to the cumulative impacts of this policy on, amongst other things, infrastructure, affordable housing provision and the character of some neighbourhoods as referred to in paragraph 4.2.5?

15. The impact of and on infrastructure has not been adequately considered. Furthermore, reliance on incremental small-site development will preclude proper planning for infrastructure. In Wandsworth most of the housing delivery has been achieved in the VNEB areas, which incorporated its own infrastructure delivery plan, but this ability to manage new and phased infrastructure delivery is unrealistic for individual boroughs to achieve on smaller sites in established areas, and particularly with the timeframe of housing delivery. For example new health, social and education infrastructure delivery for relies on a multi-agency approach and this needs to be achieved strategically through the London Plan/Mayor, as catchments for education and health provision do not usually correspond to borough boundaries and administrations. In these circumstances, the Council is concerned about the inevitable adverse impacts on existing communities and infrastructure of this type and extent of new housing delivery.
16. The policy does not cross-refer or even acknowledge the more limiting Policy D6 which requires that capacity should be determined, planned for and phased to support growth. Whilst policy D6 has been drafted in respect of maximising densities and for small sites, the Council considers that the potential scale of new homes being delivered on small sites will have a significant detrimental effect on infrastructure capacity.

17. Increasing density in high PTAL areas will not increase public transport and highway capacity. Growth targets and delivery should be proportionate to the growth in transport capacity that is committed to be achieved within the same timeframe taking into account areas where spare capacity exists. It is also important to consider network rail capacity as allowing additional growth in Outer London where it can be demonstrated that there is spare capacity at local stations will have an adverse impact on train services in Inner London as the trains will arrive already filled by new residents from Outer London.
18. As many of the main roads in Wandsworth are through routes (such as the A3 and A203) and are not managed locally, it is not clear how capacity can be increased. This is relevant given that many journeys are taken by bus (as the Underground does not serve most of the borough), and journey times and the number of buses per hour is dependant on road capacity.
19. Policy H2 is weak in respect of securing contributions towards affordable housing supply on sites with 10 or fewer units, which is in itself contrary to national policy. The potential scale of new homes delivered on small sites set out in Policy H2D will result in significant under-delivery of affordable housing potential in Wandsworth and across London. The Wandsworth Local Plan, adopted in 2016 was examined against the NPPF and Written Ministerial Statement (WMS) which precludes policies seeking affordable housing on sites below 10 units. Unless national legislation is changed or clarified in respect of London, Wandsworth is not in position to draft a replacement Local Plan policy to seek affordable housing or payments in lieu on small sites which could be found sound at Examination. Meeting the significant shortfall of affordable housing should be prioritised over and above achieving new dwellings in a piecemeal fashion through incremental increases on small sites. Reliance on small sites to meet housing targets is an unsustainable form of development, which is highly likely to lead to a polarised and more exclusive community, through a shortfall of family sized homes and affordable housing and which would become an ever-decreasing proportion of all homes, contrary to the Mayor's own policy GG1.
20. The result of this will be a significant reduction in affordable housing delivery when considering small site schemes. As such the policy is not effective and is not sound. See the tables below which show that 92% of Wandsworth housing permissions over the last 3 years are from schemes of 1–9 units and that 17% of all dwelling units were completed from schemes of 1–9 units.

Table 1

Completions 2015/16, 2016/17 and 2017/18								
Area	Number of Permissions				Percentage of Permissions			
	1–9 Dwellings	10–25 Dwellings	26+ Dwellings	Total	1–9 Dwellings	10–25 Dwellings	26+ Dwellings	
Wandsworth	504	11	30	545	92%	2%	6%	
London Total	8,868	365	577	9,810	90%	4%	6%	

Source: Planning Permissions on the London Development Database (<https://data.london.gov.uk/dataset/planning-permissions-on-the-london-development-database--lidd->),

excluding prior approvals and lawful development certificates

Table 2

Completions 2015/16, 2016/17 and 2017/18							
Area	Dwellings Completions by Permission Size				Percentage Dwellings Completions by Permission Size		
	1–9 Dwellings	10–25 Dwellings	26+ Dwellings	Total	1–9 Dwellings	10–25 Dwellings	26+ Dwellings
Wandsworth	1,250	219	5,989	7,458	17%	3%	80%
London Total	23,581	6,301	75,007	104,889	22%	6%	72%

Source: 'Housing Completions FY' report, London Development Database, excluding prior approvals and lawful development certificates

d) Is the policy support for infill development within the curtilage of a house consistent with national policy in paragraph 53 of the NPPF which refers to resisting inappropriate development of residential gardens?

21. The Council does not consider that a presumption in favour of infill development within the curtilage of a house is consistent with national policy. Taking the key aim of the NPPF which is to achieve sustainable development, there will be significant adverse environmental effects reducing the city's resilience to climate change. Infill development on garden land within a heavily built up areas such as London is likely to reduce vegetation and tree coverage and will worsen London's already substandard air quality. This will also increase ambient temperatures – exacerbating the urban heat island effect, and increase the risk of flooding.
22. There are also wider implications on climate change biodiversity. A large proportion of Wandsworth is in a high flood risk area, and this includes flooding caused by run-off. Garden land, and the control of hard surfacing in front gardens currently play an important role in mitigating against the effects of certain types of flooding.
23. South London is recognised not only a British stronghold for the Habitat Directive protected stag beetle species, but also a European one, and this is particularly the case for residential gardens in south west London. Robust evidence is required to demonstrate how the Mayor considers mitigation of, and any potential financial offsetting of impact on this Priority Species would be effective and therefore justify his policy support for garden land development.

e) Will the provisions of Policy H2 provide an effective strategic context for the preparation of local plans and neighbourhood plans including support for custom, self-build and community-led housing? Are the detailed criteria necessary and would they provide an effective basis for development management? Are the qualifications at Policy H2 HA-HC justified in themselves and would they effectively eliminate the positive presumption for small housing developments?

24. The Council does not consider that the small sites approach will provide an effective strategic context for the preparation of development plans at local level for the reasons set out in this statement.

Amendment for Clarity

25. The 0.25 hectare threshold is not referred to in H2 F 4) in the same way as it is in H2 A, H2 B, 4.2.1 and 4.2.4.
26. In H2 F 4) it is stated that the presumption in favour of small housing developments should not be applied to 'sites of **more than** 0.25 hectares in size', whereas elsewhere it is stated as applying to sites '**below** [or '**under**' or '**less than**] 0.25 hectares in size'.
27. This leaves uncertainty where a site is equal to 0.25 hectares.
28. H2 F 4) should be reworded as follows:

Sites of ~~more than~~ 0.25 hectares or more in size

f) Based on the historic delivery from sites below 0.25 hectares (whether allocated or windfalls) how will the Plan's expectations for delivery be achieved?

29. There is a large difference between the historic rate of development on small sites across London and the small sites component of the draft London Plan targets. In total there is a 179% increase, with an average of 8,800 net dwellings completed across London per year on small sites as defined by policy H2 in the last ten years, 2008/09 to 2017/18, and the draft target being 24,500 per year.¹
30. The policy incentives set out in H2 are not evaluated for how far they will increase delivery of this type of development and therefore are considered unrealistic.

g) What will happen in the interim pending the work to prepare area-wide design codes referred to in Policy H2 B 2)?

Application of Targets from 2019/20

31. The instant application of the draft housing targets from 2019/20 assumes that the uplift in development on small sites will also happen instantly. This is unlikely, especially given the effectiveness of the policy and the assumptions used in calculating the small sites target have not been evaluated.
32. A stepped small sites component of the housing target should instead be used.

¹ This is based on data sourced from Planning Permissions on the London Development Database, available at <https://data.london.gov.uk/dataset/planning-permissions-on-the-london-development-database--idd->. Net completions are counted according to the policy: sites of less than 0.25 hectares; developments of 1–25 dwellings; developments where there is a net gain in dwellings.

h) Are the provisions of Policy H2 H) relating to affordable housing requirements for minor developments justified, notwithstanding that they are inconsistent with national policy?

33. The Council has serious concerns with how affordable housing targets will be met under Policy H2 when such a significant proportion of expected supply may not trigger a contribution.

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