



Sustainability Appraisal

Wandsworth Local Plan Partial Review (LPPR)

October 2023

London Borough of Wandsworth

Local Plan Partial Review (Regulation 18) Statement

Sustainability Appraisal (October 2023)

Introduction

In 2018, as part of the preparation of the current adopted Wandsworth Borough Local Plan, the Council produced an Integrated Impact Assessment (IIA). This IIA included:

- a Sustainability Appraisal, considering all likely significant effects on the environment, economic and social factors in line with relevant legislation;
- an Equalities Impact Assessment (EIA), considering equality impacts, having regard to the protected characteristics in the Equalities Act 2010;
- a Habitats Regulation Assessment (HRA), considering the impact of planning policy on any protected European site defined by the Habitats Regulations 2010, such as Special Areas of Conservation and Ramsar sites.

The IIA was issued in 2018 alongside a Local Plan Issues document which marked the start of the review of the Plan. The Council did not produce an IIA for later stages of the Plan, instead issuing separate assessments at the relevant stages of the Plan and making these available alongside planning policy. The Council also produced a Health Impact Assessment for each stage, though this is not a statutory requirement.

The Council is undertaking a Partial Review of the Wandsworth Local Plan (2023-2038), seeking to strengthen the Local Plan policy by setting out a clear policy requirement:

- for new housing developments in the borough to provide at least 50 per cent of the total number of habitable rooms as genuinely affordable housing delivered on site;
- to seek a greater proportion of all new homes to be genuinely affordable by requiring a 70/30 split, within the affordable housing percentage split, in favour of genuinely affordable homes, maximising the delivery of homes for social rent;
- to require affordable housing from small sites below the current threshold of 10 or more homes (gross).

This review therefore applies primarily to Policy LP23 (Affordable Housing), but may necessitate changes in other policies for consistency or if issues of relevance are raised.

The extent of the public consultation on this policy (and possible implications for other parts of the plan) is set out in the Regulation 18 statement. At this stage, there are no proposed changes to the existing policy wording in the policy (or any other policy), and so there is no basis upon which a Sustainability Appraisal can be undertaken.

Undertaking the Sustainability Appraisal

Therefore, in respect of the Sustainability Appraisal, the Council is currently in a scoping stage. The Council is considering using the objectives delivered by the 2018 IIA as the basis for the Sustainability Appraisal that will be produced for the partial review. Given that these objectives were used consistently throughout the production of the adopted Local Plan with no significant issues raised, this is considered to be a reasonable and proportionate approach.

The 2018 IIA scoping report consisted of a baseline review of the plans, strategies and programmes that were published at the time, and an analysis of the key sustainability issues for the borough. From this, the report identified key headline issues for the borough and developed a proposed assessment framework which comprised a series of objectives to assess the policies that were developed as part of the plan. A copy of these objectives, which cover environmental, social, economic, equalities and health issues, is included in Appendix 1.

Policy LP23 was assessed at each stage in the production of the Wandsworth Local Plan. Its final appraisal is included at Appendix 2 for context. In conducting this partial review of the Local Plan, the Council will need to undertake a Sustainability Appraisal and assess new or revised policies against an agreed Framework. This document therefore considers whether the objectives prepared through the 2018 scoping exercise and listed in Appendix 1 remain appropriate in light of changes in key data or literature published since the IIA process began.

Baseline Data changes

The original IIA set out a baseline review of policies, plans and programmes (PPP) that were relevant to the production of the Local Plan. This was extensive, but did not yield an exhaustive or definitive list of legislative/non-legislative documents (e.g. where lower level plans included the objectives set out at a national or international level, then the national and international plans were not included).

During the process of the preparing the Local Plan, there has been an inevitable updating of legislation and data that was incorporated into the Plan to ensure it was based upon the most recent information. This has included the conducting of a population census, greater strides taken towards reducing impacts upon climate change and moving towards net zero, changes the housing market (including movement around the cost of housing and construction) and rates of economic growth. This did not alter the original objectives.

The London Plan was (and remains) an important document, and forms part of the statutory development plan for the borough. As a Spatial Development Strategy and taking account of the fact the Mayor has particular roles and responsibilities, the London Plan sets the strategic context for the Wandsworth Local Plan. The current version was adopted in 2021 (after the original IIA), and the Wandsworth Plan has benefitted in its writing from input from the GLA in respect of its conformity with this plan, which was implicit in the recent adoption of the Plan.

The affordable housing policy in particular was written on the basis of the evidence provided by the [Local Housing Needs Assessment](#) (December 2020), and evidence that sought to deal with the introduction of First Homes in summer 2021 ([First Homes](#), December 2021 and [Affordability and Financial Impact of First Homes](#), July 2021). The whole plan, including the affordable housing policies, was tested through a [Whole Plan Viability Study](#) (January 2022).

As with the original IIA, this review has been focused to ensure that only policies that are current and of direct relevance to the Local Plan Partial Review are included. Of the eleven categories¹, only population and housing are of direct relevance. Of the original 20 sustainability objectives, only four were considered relevant to the assessment of policy LP23².

It remains the case that the population in Wandsworth remains high and continues to grow, and the situation in respect of housing remains critical. Notably, the need for affordable housing in the borough exceeds the overall housing target for the borough.

Whilst some data has changed and been updated since the original scoping exercise, the key changes are not felt to raise new issues which are not already included within the sustainability objectives established in 2018. Further, the recent adoption of the plan, and continuous testing of the plan through the various stages of the plan preparation combined with the very limited scope of the review leads the Council to conclude that the existing Framework of objectives will be sufficient to assess the changes that may come about through the Regulation 18 consultation and form a part of the Regulation 19 statement.

Consultation arrangements

The Council want to seek the views of the relevant statutory consultees on this approach, and this paper will be sent to the statutory bodies as part of the Regulation 18 consultation on the Partial Review, i.e. before the Framework for the sustainability appraisal is finalised to ensure feedback can be taken on board in a timely manner.

As described above, the Council intend to use the existing sustainability objectives to carry out the sustainability appraisal required for the Local Plan Partial Review.

We welcome your views on this approach, and would particularly like to hear your views on if there is any other important updates in terms of data or new plans, programmes or strategies that mean that the Framework objectives set out in Appendix 1 now need amending.

How to respond

You can respond in the following ways:

- Online through the 'Draft Local Plan Consultation Portal', which can be accessed through the website listed above.
- By email to planningpolicy@wandsworth.gov.uk.
- By post to Spatial Planning and Design Team, Environment and Community Services, Town Hall, Wandsworth High Street, London, SW18 2PU.

The consultations begins on Monday 23 October 2023. All responses must be received by 11.59pm on **Monday 4 December 2023**.

We would be grateful if you could please respond electronically, where possible by using the online Consultation Portal. If you are responding by email or post, please use the 'Response Form' that is

¹ The eleven areas were: population and human health, housing, transport and access, business and employment, landscape / townscape and heritage, biodiversity / flora and fauna, air quality, climate factors and energy, water / flooding and climate change adaption, noise, waste

² The relevant four are underlined in Appendix 1.

available to view and download from the website listed above. Please ensure your response is clearly labelled as 'Local Plan Partial Review – Response to Regulation 18 consultation'.

Please note that responses will not be treated as confidential and those submitted anonymously will not be accepted. Further information can be found on our website at www.wandsworth.gov.uk/localplan.

Appendix One: IIA Objectives

IIA1: Avoid loss of designated ecological sites, priority habitats and species.

IIA2: Protect and enhance the natural environment, geodiversity and biodiversity of the borough.

IIA3: Conserve and where appropriate enhance heritage assets and their settings, and the wider historic environment, including buildings, areas, structures, landscapes, townscapes, important views and archaeological remains.

IIA4: Enhance the benefits to all from biodiversity and ecosystem services and establish and retain inter-connected multi-functional green infrastructure.

IIA5: To minimise consumption of natural, particularly virgin non-renewable, resources and energy.

IIA6: To minimise the generation of waste in accordance with the principals of the resource efficiency hierarchy.

IIA7: Maintain and improve air quality.

IIA8: Promote renewable and low carbon energy generation.

IIA9: Minimise flood risk in the borough and elsewhere and promote the use of SuDS.

IIA10: Provide more housing opportunities for Wandsworth residents and workers.

IIA11: Ensure people have access to essential community services and facilities, including open space.

IIA12: Reduce poverty, social exclusion and health inequalities.

IIA13: Ensure equality for everyone regardless of disability, age, race/ethnicity, age, sexuality, religion or belief.

IIA14: Address Council aspirations within priority neighbourhoods.

IIA15: Protect and improve public health.

IIA16: Reduce the impact of noise.

IIA17: Encourage the growth of sustainable transport.

IIA18: Reduce the need to travel.

IIA19: Provide employment space to meet the borough's needs.

IIA20: Ensure people have access to suitable employment opportunities.

Those underlined were relevant to Policy LP23 in the sustainability assessment completed for the Local Plan.

Appendix 2: Current Assessments for Policy LP23 (February 2023, Wandsworth Borough Local Plan, Main Modifications stage)

LP23 – Affordable Housing

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)																				Conclusions	Mitigation
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20		
Modified Policy										+		++	+		+							
										S		M	M		S							
	<p>Interpretation Summary</p> <p>The policy is modified to weight affordable housing delivery towards those who are in the most need of an affordable home. This impacts positively on reducing poverty and health inequalities but slightly minimises the overall housing tenure opportunities for all residents.</p> <p>LP23 Affordable Housing (Strategic Policy) (Modified Reg.19 Version)</p>																				<p>The policy continues to impact positively on housing needs and health for residents. The policy effects identified will continue to protect and improve public health through providing homes for those in the greatest need.</p>	<p>No negative effects identified which would require mitigation.</p>
Reg 19 Policy										++		+	+		+							
										S		M	M		S							
	<p>Interpretation Summary</p> <p>Policy LP23 is a comprehensive policy for affordable housing provision that produces a very positive effect against Objective 10 and positively scores for public health. It reflects the London Plan threshold approach and would bring direct and indirect benefits in quality of life, health, education and skills.</p>																					