

# WANDSWORTH

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## Duty to Co-operate Statement

Local Plan Publication (Regulation 19) Version  
April 2022



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## 1. Introduction

- 1.1 This statement outlines how the London Borough of Wandsworth has managed the requirements of the Duty to Cooperate throughout production of the Council's Local Plan. The Duty seeks to ensure a joined-up approach is taken in plan making, where collaborative working with other relevant organisations and bodies seeks to deliver sustainable development within the administrative boundary and the wider area on an ongoing basis. This statement details the work undertaken to date and identifies how the Council is responding to the key strategic and cross boundary issues identified. The Draft Wandsworth Local Plan 2023 - 2038 has been prepared with full regard to the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG), including the Duty to Cooperate requirements. The Draft Local Plan provides the overarching spatial strategy for Wandsworth Borough, guiding the location, scale and type of future development up until 2038.
- 1.2 This statement is a live document reflecting the progress of work that has taken place up to April 2022 and has been reviewed and updated on an ongoing basis. This statement provides an update to the [Wandsworth Local Plan Publication Draft for Regulation 19 Duty to Cooperate Statement \(January 2022\)](#).
- 1.3 Local Planning Authorities are expected to be able to provide evidence of having successfully cooperated to plan for strategic issues with cross boundary impacts when their Local Plans are submitted for independent examination. Demonstrating the Duty to Cooperate is an important part of ensuring the soundness of local plan preparation. Cooperation should be a continuous process of engagement with key stakeholders from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development within the Borough.

## 2. Context

### *Legal and Policy Context*

- 2.1 The 'Duty to Cooperate' is a statutory duty for Local Planning Authorities and is a requirement of the Localism Act 2011 and the National Planning Policy Framework (NPPF).
- 2.2 Section 110 of the Localism Act inserted Section 33A into the Planning and Compulsory Purchase Act 2004 which places a legal duty on Local Planning Authorities and other prescribed bodies to engage constructively and actively and on an ongoing basis to maximise the effectiveness of local plan preparation in the context of strategic cross boundary matters. Local Planning Authorities

must demonstrate how they have complied with the Duty at the examination stage of their Local Plan.

### *National Planning Policy Requirements*

- 2.3 The NPPF states that Local Planning Authorities are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries and this should clearly be reflected in individual Local Plans.
- 2.4 Paragraph 24–26 of the NPPF set out where collaboration amongst local communities and relevant bodies is expected and gives further guidance on planning strategically across local boundaries. It also requires demonstration that the plan is deliverable and is based on effective joint working on cross boundary strategic priorities. This is also reinforced in the PPG, which sets out what is required and gives further guidance on the Duty to Cooperate.
- 2.5 Paragraph 27 of the NPPF has also introduced a requirement to produce Statements of Common Ground (SoCG) throughout the plan-making process to document where effective cooperation is (and is not) taking place as plans are drawn up and taken through the statutory process to adoption. More information can be found in Section 5.
- 2.6 The Duty to Cooperate is both a legal and a soundness test, and LPAs are required to submit details at Local Plan examination of how they have complied with the duty.
- 2.7 The requirement for the Statement of Common Ground therefore operates in tandem with the ‘tests of soundness’. These are used at local plan examinations to ensure that there is not only a proactive and positive approach to strategic planning matters across housing market areas, but that there is a clear (and agreed) approach to how these will be delivered in all relevant local plans. The test most specific to the Duty requires plans to be: Effective – deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.

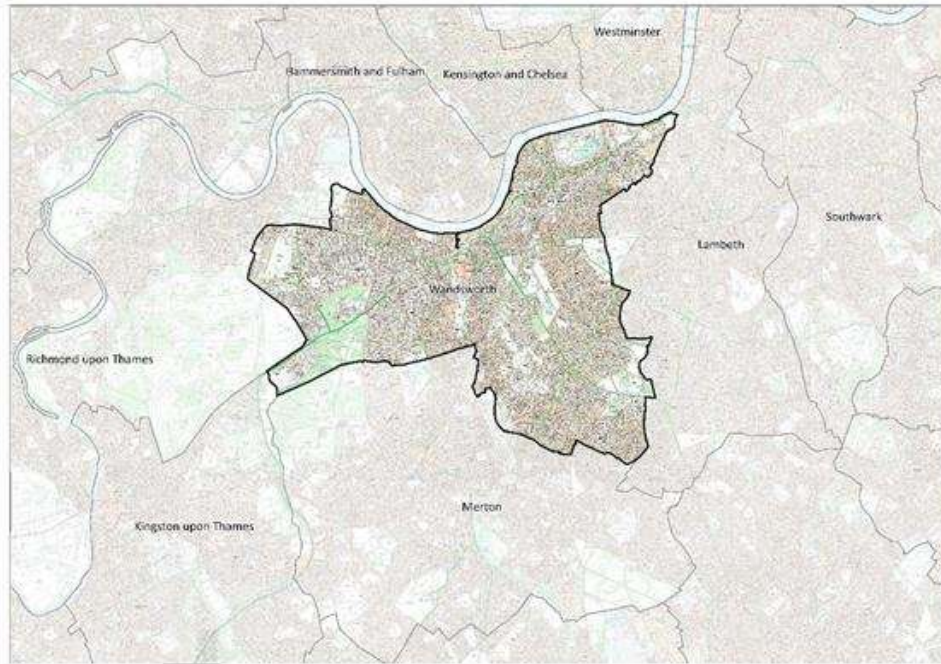
### *Strategic Context*

- 2.8 The NPPF and PPG highlights that LPA’s have a Duty to Cooperate on planning issues that cross administrative boundaries.
- 2.9 Sitting in south-west London, Wandsworth is an inner London borough bordered by the **London Boroughs of Lambeth, Merton and Richmond** and the **Royal Borough of Kingston Upon Thames** and, across the River

Thames, the **London Borough of Hammersmith and Fulham**, **Westminster City Council** and the **Royal Borough of Kensington and Chelsea**.

- 2.10 The area shown in Map 1 has been identified as the strategic planning area for the purposes of the SoCG. These boroughs represent key Duty to Co-operate partners and contain areas most likely to be directly affected by the policies set out in the Wandsworth Local Plan. See SoCG for the statements.

*Map 1: The relationship between Wandsworth and neighbouring boroughs*



- 2.11 A number of neighbouring planning authorities have recently reviewed their Local Plans or are currently reviewing them. Figure 1 below shows the current status of their Local Plans.

*Figure 1: Neighbouring planning authorities' Local Plan revision status*

<b>Authority</b>	<b>Local Plan Status</b>
<b>London Borough of Lambeth</b>	Adopted September 2021
<b>London Borough of Kensington and Chelsea</b>	Draft Policies Consultation 9 February – 23 March 2022
<b>Kingston Upon Thames</b>	Further Consultation Stage July – September 2021
<b>Merton</b>	Submitted Local Plan to PINs 2 December 2021
<b>Richmond Upon Thames</b>	Pre-publication consultation on the draft Plan and SA (Regulation 18) December 2021 - February 2022
<b>Hammersmith and Fulham</b>	Local Plan adopted February 2018
<b>Westminster</b>	Adopted April 2021

*London Context*

- 2.12 As made clear in national policy and guidance, effective cooperation between the Mayor, boroughs and local planning authorities bordering London is vital to ensure that important strategic issues are planned effectively. There is a requirement for the Regulation 19 Draft Local Plan to be in conformity with the London Plan 2021. The Council works in close partnership with the Greater London Authority (GLA) and Transport for London (TfL), and all parties have taken part in frequent meetings and correspondence throughout the production of the Wandsworth Draft Local Plan.
- 2.13 Importantly, this has allowed the Council to work with the GLA to address, in the preparation of its Local Plan, the changing nature of the London Plan as it has progressed from inception to adoption - all of which has happened at the same time as the Council's review of its Local Plan. The Council has responded to the following key stages of London Plan production; consultation draft, publication, consolidated suggested changes version, Examination in Public, report from the Panel of Inspectors, Intend to Publish London Plan and the Secretary of State directed changes and correspondence. The new London Plan 2021 was formally published by the Mayor on 2 March 2021. There is a requirement for the Wandsworth Local Plan to be in general conformity with the London Plan. Within this context, local policy approaches are appropriate and indeed London Plan policy expects these to be set out in London boroughs' local plans. However, there are certain areas where a locally distinctive approach has been taken that differs from the strategic London Plan policy but that is justified by local evidence. The Council has raised these matters with the GLA and TfL during the

preparation of this Draft Local Plan. Further details can be found within Appendix B.

- 2.14 Wandsworth shares a land boundary with the boroughs of Lambeth, Merton, Kingston upon Thames, Richmond whilst the boroughs of Hammersmith and Fulham, Kensington and Chelsea and Westminster are located across the River Thames to the south. Wandsworth has maintained regular and open communication with neighbouring boroughs throughout all stages of Local Plan development, including email communication, and conference/video calls with officers from neighbouring boroughs (individually and as groups). All neighbouring boroughs were invited to comment on the draft Local Plan at the Issues, Regulation 18 and Regulation 19 Stages. Following the Regulation 18 public consultation, all neighbouring boroughs and relevant prescribed bodies were invited to attend follow-up meetings with officers to discuss any strategic matters of relevance. A record of these meetings is listed in Appendix A.
- 2.15 Planning officers from Wandsworth regularly attend meetings with the Association of London Borough Planning officers (ALBPO), including the Development Plans group and the Planning Officers' Sub-Group. These are London-wide forums for the discussion of strategic issues and include updates from each authority on key work, which may have cross boundary implications. In addition to all London boroughs these meetings include the GLA and the London Government Association.

#### *Formal Partnerships*

- 2.16 Wandsworth is a member of various formally constituted sub-regional partnerships and working groups, which address cross-border strategic matters. These are described below:
- Wandsworth First Strategic Partnership Board includes the Clinical Commissioning Group and brings together the public, private, voluntary and community sectors to work together to improve the quality of life for all who live in, work in, and visit Wandsworth.
  - Western Riverside Waste Authority (WRWA) comprises four boroughs in the 'Western Riverside' area of London. It is responsible for disposal of household waste. The Western Riverside waste planning authorities of Wandsworth, Lambeth, Kensington & Chelsea, Hammersmith & Fulham and the Old Oak and Park Royal Development Corporation (OPDC) have been working together on waste planning since 2015.
  - The Vauxhall Nine Elms Battersea Strategy Board was established in 2009 to provide strategic leadership for the implementation of the Opportunity Area Planning Framework for Vauxhall Nine Elms Battersea (now known as Nine Elms Vauxhall). It is co-chaired by the leaders of Wandsworth and Lambeth councils and meets bi-monthly, as do subject-specific working groups. It is attended by major landowners, developers and officers of the public authorities.

- Chamber of Commerce is represented at town centre meeting, council initiatives, co-hosted events and collaborations.

#### *Wandsworth Joint working*

2.17 Joint working also goes beyond preparing plans. Examples of this include the following:

- Legal services are also shared with other boroughs; the South London Legal Partnership is a five-borough shared legal service for the London Boroughs of Wandsworth, Richmond, Kingston, Merton and Sutton.
- Wandsworth Council officers regularly attend meetings and actively contribute to the Association of London Borough Planning Officers, which provides a very useful platform for engaging with other London Boroughs on planning matters.
- There are also regular meetings with specific stakeholders and Duty to Co-operate bodies, for example, Council officers regularly meet with health bodies, including Public Health, Wandsworth Clinical Commissioning Group, NHS England, NHS Properties Services and the London Healthy Urban Development Unit, to discuss issues relating to the emerging Local Plan, the south-west London Sustainability & Transformation Plan, the Joint Strategic Needs Assessment, and other initiatives.
- Public Practice engagement events, which involve officers from planning authorities within and outside London and provide a format for the sharing of good practice.

2.18 Since the 1 October 2016, Richmond and Wandsworth have had a shared staffing arrangement in place. As a result, planning officers within Richmond and Wandsworth work closely, sharing the same Spatial Planning and Design Team Manager. At the recent Regulation 18 consultation event in January 2022, Wandsworth planners were involved in leading focussed public consultation sessions at the consultation events that were held. Weekly programme meetings are attended by both Richmond and Wandsworth Planners. Joint team meetings are held throughout the year.

#### *Prescribed bodies*

2.19 Prescribed bodies are set out in Part 2 of the Town & Country Planning (Local Planning) (England) Regulations 2012. These are:

- The Environment Agency
- The Historic Buildings and Monuments Commission for England (known as Historic England)
- Natural England
- The Mayor of London
- The Civil Aviation Authority
- The Homes and Communities Agency



- Each Primary Care Trust established under section 18 of the National Health Service Act 2006(2) or continued in existence by virtue of that section
- Each Integrated Transport Authority
- Each highway authority within the meaning of section 1 of the Highways Act 1980(6) (including the Secretary of State, where the Secretary of State is the highways authority)
- The Marine Management Organisation

### **3. Wandsworth Local Plan Review**

#### *Stage 1 Issues and Options Stage*

- 3.1 The Council started a review of its current Local Plan in 2018 and between December 2018 and February 2019, undertook a consultation on the scope for the updating the adopted Local Plan in the form of an 'issues document'. This was an additional stage of consultation by the Council (not prescribed by the Town and Country Planning (Local Planning) (England) Regulations 2012) to provide the opportunity for early engagement with the borough's communities, businesses, key stakeholders, neighbouring local authorities and statutory bodies. A focussed employment workshop was held on the 2/12/19 to discuss with key stakeholders the initial findings of the Employment, Land and Premises Study 2020.

#### *Stage 2 Preferred Options Stage (Regulation 18)*

- 3.2 Following the initial consultation, the Council prepared a draft Plan setting out proposed planning policies informed by the main issues raised at the issues and options stage and supported by an up-to-date evidence base. A second round of public consultation was held between 4 January 2021 and 1 March 2021. The Council consulted with a range of stakeholders, including both statutory and non-statutory bodies, as well as local communities. Focussed duty to cooperate meetings were held with prescribed bodies during and after the consultation. The Council reviewed and updated the existing policies as well as the site-specific proposals in line with the originally outlined rationale, scope and intention for review, also taking account of the consultation responses and outcomes from Duty to Co-operate and engagement activities. An online workshop regarding the Whole Plan Viability (5.5.21) was held for key stakeholders and was attended by developers, agents, NHS Trust, Architects and Landowners.

- 3.3 The Pre-Publication Local Plan, which was the Council's first formal draft of the revised Local Plan, was subject to public consultation from 4 January until 1 March 2021.
- 3.4 The Council received consultation responses to the Pre-Publication consultation from the following Duty to Co-operate bodies:
- Highways England
  - Historic England
  - Natural England
  - NHS Property Services Ltd
  - The Mayor of London
  - Sport England
  - Marine Management Organisation
  - Port of London Authority
  - Thames Water
  - NHS HUDA
  - Environment Agency
  - London Underground
  - National Grid
- 3.5 After the consultation period, the representations received were considered and the Local Plan amended accordingly. Where appropriate, emails were sent to stakeholders and consultees where further information or discussion was required as a result of their comments to the draft Local Plan.
- 3.6 All of the consultation responses received were published within the [Statement of Consultation Report, January 2022](#), which also sets out the Council's response to the comments raised in [Appendix 5](#).
- 3.7 On 20 July 2021, Government published a revised NPPF, following an earlier consultation. Regard has been had to whether the revised NPPF would now require any amendments to be made to the policies to be contained in the Regulation 19 'Publication Version' Local Plan.

### *Stage 3 Publication Stage (Regulation 19)*

- 3.8 The new Local Plan will form part of the development plan for the borough. Following the Regulation 18 consultation, the Council made changes to the Plan (taking into account comments received on the consultation draft Local Plan, together with any additional/refreshed evidence base work where appropriate).

This produced the Regulation 19 version of the Plan that the Council intends to submit to the Secretary of State for Examination.

- 3.9 The Council ran a 6 week public consultation from the 10<sup>th</sup> January to the 28<sup>th</sup> February 2022 providing the opportunity for stakeholders to submit further feedback. In accordance with the relevant legislation, representations made at this stage should focus on soundness and legal and procedural compliance. The 'Publication' Local Plan – along with the evidence that underpins it and all of the feedback received in the various public consultation events – is submitted to the PINS acting on behalf of the Secretary of State. An Examination in Public will then be undertaken by an independent Inspector appointed by the Secretary of State before it can be adopted by the Council. The London Plan, prepared by the Mayor of London, also forms part of the development plan, and the new Local Plan has to be in general conformity with it.
- 3.10 The Council received comments on the Publication Version of the Local Plan from the following prescribed bodies:
- Historic England
  - Natural England
  - NHS Property Services Ltd
  - The Mayor of London
  - Sport England
  - Marine Management Organisation
  - Thames Water
  - Environment Agency
  - Port of London Authority
  - Sport England
  - NHS HUDU
- 3.11 All of the consultation responses received are published within the Statement of Consultation Report April 2022.
- 3.12 During the Regulation 19 consultation, Prescribed bodies that had submitted comments to the Regulation 18 were contacted to discuss any issues and to explain the approach taken in the Regulation 19 Version of the Local Plan. Appendix A sets out further details on the meetings.
- 3.13 As part of the Shared Services that Wandsworth and Richmond work under, Richmond planners have been used to critically appraise iterations of the Draft Local Plan.
- 3.14 The latest version of the Council's [Local Development Scheme](#), available on the Council's website, sets out the timetable for production of Wandsworth's

Local Plan documents. The Local Plan is subject to three stages of public consultation:

Stage	Dates
Issues Consultation	December 2019-February 2019
Pre-publication consultation (Regulation 18)	4 January 2021 - 4 March 2021
Publication Consultation (Regulation 19)	10 January 2022 – 28 February 2022
Submission to PINS	29th April 2022

- 3.15 Consultation and engagement on the Local Plan is being carried out in accordance with the measures sets out in Wandsworth’s [Statement of Community Involvement](#) that was adopted by the Council in 2019.
- 3.16 With regards to the emerging Wandsworth Local Plan, at each stage summaries of comments received and responses from stakeholders were produced and made available for viewing on the Local Plan pages of the Council’s website.
- 3.17 Read alongside current, or future, Statement of Common Grounds (SoCG), these documents will demonstrate progress made on matters between the Council and stakeholders.
- 3.18 As evidence of the Local Plan’s positive preparation, this DtC Statement will assist the Planning Inspector in determining that the Council has fulfilled its Duty to Cooperate responsibilities.

#### **4. Duty to Cooperate outcomes on Strategic Matters**

- 4.1 The council has made every effort to secure the necessary cooperation on strategic cross boundary matters before submitting Wandsworth’s Local Plan for examination through active and sustained engagement from the outset of plan preparation. This has gone beyond formal consultation to include; meetings and early and open discussions regarding policy development, and to share findings from partners’ emerging evidence base. This has been more challenging in the context of Covid-19 restrictions on face-to-face communications.
- 4.2 As a London borough and in a two-tier government structure with the Greater London Authority, Wandsworth is in a position of communicating with the Mayor of London and other boroughs on a wide range of strategic matters (transport, employment, infrastructure, housing, funding affordable housing etc) that are important for strategic plan making.
- 4.3 Alongside formal notification of the public consultation on the Publication Local Plan (Regulation 19), which was sent to all of the neighbouring authorities and

prescribed bodies, the Council extended an invitation to certain prescribed bodies to meet with Council officers, affording the opportunity to provide a more bespoke update on relevant changes within the draft Local Plan, as well as to consider potential strategic matters, against those identified in paragraph 20 of the NPPF, and cross-boundary issues. Minutes of these meetings can be found in Appendix B.

- 4.4 The organisations that the invitation was extended to is recorded in Appendix A, and a summary of the key DtC issues are detailed below.
- 4.5 The Council considers this demonstrates that positive engagement through the Duty to Co-operate has resulted in regular exchanges of information, particularly sharing evidence base and updates to policy approaches, and has informed the preparation of the Local Plan.

## **Evidence of Cooperation on Strategic Matters**

### **Neighbouring Local Authorities (dates of DtC meetings with Wandsworth Borough Council)**

- London Borough of Hammersmith and Fulham, (25.02.21)
- Royal Borough of Kensington and Chelsea, (24.02.21)
- Royal Borough of Kingston, (27.02.21)
- London Borough of Lambeth, (25.02.21)
- London Borough of Merton, (22.01.21)
- Westminster City Council, (15.01.21)

### **Prescribed and other bodies**

- Greater London Authority, (22.02.21, 26.05.21 & 14.2.22)
- Historic England, (04.02.21, 16.2.22)
- Transport for London, (05.02.21 & 15.2.22)
- Environment Agency (22.2.22)
- Thames Water (Thames Tideway/Bazelgatte) 22.2.22
- Western Riverside Waste Authority (10.3.222)

## **4.6 Housing market, including affordable housing**

### **Background**

#### **a) Housing**

In line with the housing requirement set out in the London Plan, the Local Plan will seek to deliver at least 1,950 homes per year to 2028/29. Although this is lower than the objectively assessed local housing need, a comprehensive review of land and sites available for development (including large, small and windfall sites) indicated that there is insufficient capacity to meet the objectively assessed local housing need. All options have been thoroughly explored with regards to meeting as much of the objectively assessed housing need as possible.

The Local Housing Need Assessment (LHNA) identifies a net need for 2,327 affordable rented and 1,248 affordable home ownership dwellings per annum to be provided over the plan period. The level of need is significant, and for that reason the proposed affordable housing policy (LP 23) sets the aspiration to secure 50% of all new homes to be affordable, in line with adopted London Plan. This has been informed by the outcomes of a Whole Local Plan Viability Assessment and the Nine Elms Development Infrastructure Funding Study.

The new Local Plan will seek to deliver a range of housing types, including Build to Rent, housing for students and the elderly. It is not considered that any of these forms of accommodation leads to strategic cross-boundary issues.

### **Key discussion at Reg 18 Stage with neighbouring boroughs and prescribed bodies**

The analysis of intraregional commuting and migration data outlined in the Local Housing Need Assessment (2020) shows that the London Borough of Wandsworth (LBW) has an on-going relationship with the boroughs that make up the South West Sub-Regional housing market, as defined in the 2012 Wandsworth SHMA. During individual DtC meetings with each local authority that took place in February 2021, the Council explained Wandsworth's spatial strategy and the housing trajectory showing that Wandsworth would be capable of meeting the London Plan housing target. Given that the new Local Plan aims to meet the London Plan's housing requirement and deliver a range of housing types, it is not considered that the Local Plan leads to any housing-related cross-boundary issues.

At the DtC meeting on the 22.01.21 London Borough of Merton (LBM) formally asked LBW if any assistance would be possible to meet some of their housing requirement (as they had previously asked in 2019). Due to insufficient housing capacity, it is not possible for LBW to support LBM with their housing requirement. The other boroughs are not seeking assistance with the housing requirements.

Westminster City Council (WCC) raised questions over First Homes. LBW considered that it is unclear whether First Homes would be included in intermediate or social rent homes. LBW agreed to keep this under review as part of the Regulation 19 version of the Local Plan.

Greater London Authority (GLA) shared support of the work LBW have taken to inform capacity at a DtC meeting on the 14.2.21. GLA noted that LBW should consider targets

beyond 2028/29 and that they should have confidence in targets set out by the London Plan. GLA recommend that LBW should incorporate the small sites target within the body of the policy to give it additional weight. This is the approach of the Local Plan.

GLA recommend that LBW affordable housing policy should clarify how it will apply the Mayor's threshold approach to viability testing. The GLA were satisfied with LBW's approach to the tenure split. GLA advised that LBW 15% on-site approach to affordable housing within the VNEB OA is based on outdated evidence and that this should be reviewed.

The GLA and LBW discussed Build to Rent, GLA suggested that LBW could take a positive approach to specifying where Built to Rent would be appropriate, as set through site allocations.

No neighbouring boroughs submitted a response regarding housing numbers as part of the Regulation 18.

### **Regulation 19 Stage**

No neighbouring boroughs submitted a response to the Regulation 19 Stage.

### **Mayor of London**

At a DtC meeting on the 14.2.22 LBW updated the GLA on the housing requirement approach. New Policy SDS1 now accounts for the London Plan targets including the small site target. The GLA were happy with the approach in being in conformity with the London Plan.

LBW explained that new policy LP 23 (Affordable Housing) in Reg 19 now accommodates First Homes with 25% First Homes requirement alongside 50% low-cost rent, and 25% intermediate addressing concerns of split between low-cost rented and intermediate housing.

Whilst recognising the national policy for First Homes, the GLA raised concern about the requirement for 25% First Homes within LP 23, and sought further understanding about the background to it. The GLA expressed concern regarding the requirement both in terms of its viability in a London context, and the potential impact on the need for social rented homes in London. The requirement in particular may raise unrealistic expectation around delivery and viability.

GLA were also concerned about delivering First Homes as opposed to shared ownership, which would mean losing out on low cost rented. The GLA mentioned that from evidence with other boroughs, First Homes is not a product that generally works in a London context, so GLA do not want to put it up front and present it as an essential requirement if a developer is put off. The greatest need in London is for low-cost rent and 25% First Homes could jeopardise that.

LBW discussed further evidence undertaken to try to understand the practical impacts more fully, and First Homes might be viable in some locations at the minimum 30% discount, but not to all people in all locations, thus the flexible approach, but few

applications had yet been tested, and further monitoring is required. LBW to consider the GLAs comments through the Reg.19 process and beyond.

GLA had commented on Reg 18 Policy LP 28, re: Residential Conversions (Part of the aim of this policy is to protect family sized dwellings). The GLA had commented that the 150sqm floorspace threshold used seemed quite high against the nationally described space standards. The revised Reg 19 policy reduces the threshold down to 130sqm, which better reflects the nationally described space standards and the approach taken by other authorities recently.

LBW discussed with the GLA their comment regarding 15sqm external amenity space for family houses; the London Plan standard is only 5sqm and a further 1sqm for each additional occupant. The GLA responded by stating that this was not a conformity issue and were not going to object to locally developed standards. In respect of the overall target for affordable housing, GLA recognise changes made and take on board changes around the removal of the 15% minimum target in VNEB.

LBW discussed housing issues at the DtC meeting with Historic England on the 20.2.22 where they had suggested that the wording in the Reg.18 plan for garden development was not strong enough. LP 7(E) has been revised slightly to be in line with a presumption against development. Loss of garden space will now only be acceptable in exceptional circumstances where the proposal is for comprehensive redevelopment of a number of whole land plots. The justification for this is to avoid new open space requirements preventing such comprehensive development and the quantum of open space would not be lost. The Urban Greening Factor would also set out quite onerous requirements for new developments.

HE commented they have had discussions with the GLA about the Urban Greening Factor. They were concerned too much of a focus is being placed on urban greening and not Green Infrastructure which is considered to be more meaningful. LBW stated that the scale of development will play a role in this as the Wandle Delta Masterplan SPD area is planning for a new park and new infrastructure to open up the River Wandle with green spaces.

## **Next steps**

The Council will continue to keep Duty to Cooperate bodies informed with regards to Wandsworth's ability to meet the London Plan housing target. The Council to produce further evidence on direction of First Homes to inform the position.



## **b) Gypsies and Travellers**

### **Background**

The Council has a long-established Gypsy and Traveller site, which currently accommodates 11 residential pitches, one of which is vacant. The Gypsy and Traveller Accommodation Needs Assessment (2019) found that there is no evidenced requirement or need for additional pitches to be provided on the existing site or elsewhere in the borough. If demand exceeds supply in the future, the Council will actively explore options to identify an additional site, in accordance with the Policy LP 34 (Gypsy and Traveller Accommodation). No strategic or cross-boundary issues identified.

### **Key discussion points**

During a meeting on 27<sup>th</sup> January 2021, Royal Borough Kingston upon Thames (RBKuT) highlighted there is an identified need for Gypsies and Travellers accommodation that they are unable to meet. While LBW are able to meet their own need (one site), they do not have the flexibility to assist RBKuT in this regard.

At the individual DtC meeting in February 2021 it was noted that:

- Both LBW and London Borough Lambeth (LBL) welcome the SoS amendment of the definition for Gypsies and Travellers being used in the London Plan.
- LBM conducted a study in 2012/2013 that indicated that current and future Gypsy/Traveller needs could be met however, they are looking to update this and will liaise with LBW.
- WCC has no identified capacity or need for Gypsy and Traveller pitches and noted that need should be strategically assessed by the Mayor or at a London-wide scale
- London Borough Westminster, Lambeth, Merton, Richmond, Hammersmith and Fulham, Kensington and Chelsea intend to meet their Gypsy and Traveller accommodation, and thus it is not considered that it constitutes a cross-boundary issue.

### **Regulation 19**

No comments received from Prescribed bodies or neighbouring authorities regarding Gypsy and Traveller provision within the Local Plan at this stage.

### **Next Steps**

Next steps: The Council will continue to keep neighbouring boroughs informed with regards to Wandsworth's ability to meet the identified need for gypsy and traveller pitches. The GLA are now undertaking a cross London Gypsy and Traveller Study which will identify needs to 2031. The Council will update its Gypsy and Traveller Study for submission.

## **4.7 Economy/Employment Land Supply**

### **Background**

LBW updated the Employment Land and Premises Study in 2020, which suggests there is demand for office floorspace (22,500 sqm) and industrial land (8.6ha) in excess of supply. The Local Plan therefore takes a protective approach.

The ELPS is based on economic forecasting data derived from before the pandemic. This is likely to have a significant impact on office floorspace. The Local Plan therefore commits to monitoring this and will be revised as necessary.

**Offices** – the Local Plan continues the approach of the LP Employment and Industry Document 2017 in that it distinguishes between two office markets: the CAZ in Nine Elms and the local/ sub-regional market in the rest of the borough.

**Industry** – building on the previous designation as an ‘Industrial Business Park’ (current London Plan), the Local Plan promotes the concept of the Battersea Design and Technology Quarter (BDTQ), located south of the Battersea Power Station in Queenstown Road, Battersea SIL. The concept seeks to leverage the investment in the wider VNEB OA and to build upon the area’s existing creative economy to deliver intensified economic uses: by bringing new SME jobs to the area which complement the anticipated digital cluster at the Battersea Power Station Development; and by promoting the intensification of the existing industrial activities within the SIL.

The Local Plan also amends the approach to the provision of affordable, flexible and managed workspace. All economic developments must contribute to these through the provision of a range of unit sizes. Developments that provide over 1000 sqm of economic floorspace must provide a proportion of that floorspace (10% or 400m) as either ‘open workspace’ or at a sub-market rent. The former follows the definition from the GLA’s work. For the latter, the Draft Plan proposes that the deduction is area-based, introducing a new requirement for 50% less than the prevailing market rate in VNEB OA, 25% less for sites in the Wandle Valley, and 20% less elsewhere (existing requirement).

## **Key discussion points**

### **Regulation 18**

During individual DtC meetings with each local authority that took place in February 2021 the Council discussed employment land issues. London Borough of Hammersmith and Fulham raised the issue of potential challenges of protecting office and industrial land, particularly in the context of proposed PDR, which was also noted by both LBW and LBHF.

LBHF advised LBW to consider the evidence they produced in support of the Affordable Workspace SPD (LBHF). The conclusions of research suggested that the impact of COVID-19 on office floor space might not be as large as initially thought.

RBKuT noted that initial findings from their evidence base suggest there will be a need for additional office space, despite the impact of COVID-19.

LBL supportive of the approach to affordable workspace, noting it would help achieve parity across the opportunity area. LBL will carefully assess and review the area of the SIL being proposed for the BDTQ. LBL submitted comments as part of the Reg 18 consultation regarding the BDTQ.

LBW and WCC discussed challenges of protecting industrial uses that now fall under E Use Class and are considered generally aligned on the issue. Both boroughs agreed to share consultation responses once they had been drafted with respect to potential PDR impacting Class E.

The GLA commented that the Draft Local Plan is founded on positive work in establishing the level of demand over the plan period.

The GLA highlighted that there is the potential issue of non-conformity with the principle of co-location within the Battersea, Queenstown Road SIL (as the Battersea Design & Technology Quarter), which is not supported by the London Plan. The GLA recommended that if this option is to be pursued it would need to be done through SIL consolidation and release and that the principle of vertical co-location, as advocated within the BDTQ, is less preferable than horizontal co-location of different uses. LBW explained that the proposal to encourage co-location within the Battersea Design & Technology Quarter / part of the Queenstown Road, Battersea SIL is predicated on investment that is occurring to the north of this site.

LBW informed that the Summerstown LSIA is being proposed as SIL within the draft Local Plan, in line with the Publication London Plan, and would provide an uplift on the amount of SIL-designated land within the borough in the draft Plan compared with the adopted Local Plan.

The GLA advised LBW that it would be useful if certain logistics, industrial and related functions in selected parts of SIL or LSIS could be intensified to provide additional industrial capacity – which should form an additional piece of evidence base work to support the Local Plan. The GLA highlighted that the draft Plan includes few details on the amount of additional industrial floorspace (and ha-equivalent) that could be delivered in specific locations over the Plan period. It would be helpful to clearly present in the Plan how the identified industrial demand could be met across Wandsworth's industrial and other locations e.g., through a schedule. The GLA felt that these additional details would provide further certainty and ensure that the draft Plan's strategy would be effective in meeting identified demand for industrial and related functions, as well as providing clarity for development management purposes.

## **Regulation 19**

Update since Regulation 18:

LBW have retained the approach to the BDTQ within the Queenstown Road SIL as this was set out within the Regulation 18 Local Plan, notwithstanding objections made within the Mayor of London's representations. This locally specific policy builds on the broader strategy and investment in Nine Elms, encouraging employment creation by permitting the co-location of intensified industrial uses with SME office floorspace in the area designated in the previous Local Plan as an Industrial Business Park. The majority of the other aspects of the representation relating to employment land have been addressed, including changes to the affordable workspace policy.

LBW set out that the Housing and Economic Land Availability Assessment (HELAA) document has been significantly updated from the version published during the Regulation 18 consultation, primarily to account for a design-led approach to housing capacity rather than values taken from the SHLAA. This is informed by the Urban Design Study (January 2022) undertaken by Arup. For industrial land, the HELAA

sets out the identified demand based on the Employment Land and Premises Study undertaken by AECOM (October 2020), which identifies a land requirement figure of 8.6 ha, which includes a requirement of up to 2.1 ha of land for waste management. As there is no additional land within the borough which can accommodate industrial uses, the HELAA uses takes the demand figure for core industrial uses of 5.5 ha, and translates that to a floorspace need of 35,700 sqm, based on the GLA's 0.65 plot ratio. This approach to floorspace was agreed with the GLA in the previous Duty to Cooperate meeting in May 2021.

The Regulation 18 HELAA assessed capacity based on that identified within the We Made That Battersea Design and Technology Quarter Economic Appraisal and Development Framework study and the Wandle Delta Masterplan SPD. The update to the HELAA takes a more detailed approach, also incorporating industrial capacity in our pipeline (including in non-designated industrial locations), and that provided by the site allocations. The outcome of the updated HELAA suggests a capacity of c. 45,000 sqm, which exceeds the core need with a buffer for other uses, such as waste. The intensification provided by the BDTQ initiative is key in meeting this capacity; without the gains from this the borough would be falling short of target.

At the DtC meeting the GLA noted concern that the ability to meet capacity is heavily reliant on the BDTQ in order to meet the identified need; however this is the same area in which co-location is permitted in the draft policy. The GLA need to be convinced that LBW can meet industrial need overall, particularly given the proximity of the Queenstown Road SIL to Central London. They will need to better understand how realistic the intensification potential, and to allay concerns that the SIL-type industrial uses are retained and protected, including B8 storage and distribution uses (in line with LBW's identified demand). If the borough wishes to co-locate industrial uses within SIL, then it will need to be de-designated as such, and land and SIL-type uses re-provided elsewhere in the borough.

The GLA stated that while it is fine for other employment designations to be included within the Local Plan, these should be clearly set out and not undermine the SIL / LSIS designations. Existing industrial uses must be protected, and the Agent of Change principle can help in this regard.

### **Next Steps**

- The GLA have been contacted by PRD (consultancy), who are undertaking a re-refresh of the BDTQ concept on behalf of LBW, and welcome the opportunity to be involved in that work.
- Both GLA and LBW will continue to liaise through this study and the examination process to refine the approach to the BDTQ.

## **4.8 Town Centres/ Retail**

### **Background**

LBW updated the Retail Needs Assessment (RNA) in 2020, which identifies that there is no clear need to identify or plan for an increase in retail and food/beverage floorspace over the majority (up to 2035) of the LP period.

The RNA is based on data derived from before the pandemic. This is likely to have a significant impact on retail, leisure and food/beverage floorspace, however it is considered likely to exacerbate pre-pandemic trends identifying a shorter-term oversupply of such floorspace. The Local Plan therefore commits to monitoring such uses, including through town centre use and vacancy monitoring, and the Local Plan will be revised as necessary. The Council will, in the review the Local Plan, commission more research at the appropriate time and once more reliable data is available, and the policies will be adjusted accordingly as part of future reviews of the Local Plan.

In response to broader legislative changes (Use Class E), the Local Plan sets out a new approach to retail. This is no longer protected through a threshold approach to the number of units in the A1 Use Class, as it is considered not possible to implement such a policy. The Local Plan retains frontages as identified preferential locations, and seeking to accommodate Class E, it supports a more diverse range of uses within the centres (and designated frontages). There is potential to impose conditions on new development to limit changes of use.

A non-immediate Article 4 Direction has been made to remove permitted development rights regarding the change of use from class E use (commercial, business and service uses) to C3 use (dwellinghouses). The Direction was made by the Council on 30 July 2021 and is intended to come into force on 1 August 2022, subject to any potential SoS intervention.

The approach to town centres set out within the Local Plan is considered to be consistent with London Plan Policy SD 6 (Town centres and high streets).

The Local Plan introduces new policies on the Evening and Night-Time Economy (LP 48) and Meanwhile Uses (LP 50). Residential development is permitted in centres through high density mixed-use development on allocated sites, and through the conversion of upper floors and parts of ground floor units that do not front on to the street, as long as the commercial viability of the unit can be ensured.

The Local Plan takes a town centre first approach, applying stronger requirements on out-of-centre proposals for town centre uses. This is consistent with London Plan Policy SD 7 (Town centres: development principles and DPDs).

The Local Plan identifies Clapham Junction, Putney, Tooting, Wandsworth and Balham as 'Town Centres'. The London Plan identifies the first four as Major centres within the Town Centre Network, whereas Balham is identified as a District centre, alongside Earlsfield and Lavender Hill/Queenstown Road. The latter are identified as Local Centres in the Local Plan.

This introduces a degree of inconsistency with the categorisations within the London Plan, however it is based on robust evidence as set out within the Retail Needs Assessment 2020. It is considered to be consistent with Policy SD 8 (Town centre network), which states that, "changes to District, Local, Neighbourhood and CAZ Retail Clusters can be brought forward through Local Plans where supported by evidence in development capacity assessments and town centre health checks and subject to assessments of retail impact where appropriate".

Informed by the Retail Needs Assessment and given the uncertainty caused by the COVID-19 pandemic and impact of the Government's response to this, both through protective measures and amendments to the Use Class Order, it is not considered appropriate to review the town centre boundaries at this time.

The Draft Local Plan supports the continued implementation of the Vauxhall Nine Elms Battersea Opportunity Area, including the emerging CAZ retail clusters at Battersea and that at Vauxhall (shared with LB Lambeth). Both are 'unclassified' within the London Plan Town Centre network.

## **Key discussion points**

### **Regulation 18**

It was noted at the DtC meeting on the 25.02.21 that neither LBW nor LBHF can apply their existing adopted policy threshold-based approach to retail protection following amendments to the UCO (Class E).

Kingston, Merton, Westminster, LBHF discussed at individual meetings how they have sought to accommodate the introduction of the E Use Class within their plans with respect to town centres and appropriate uses, welcoming the flexibility that this brings.

WCC, in their draft Plan, sought to include policy criteria to allow the imposition of conditions limiting the use of a development where local criteria was met; however, this was not accepted by the Inspector. WCC recommended that strong local evidence would be needed to justify such an approach. Both boroughs felt that it is helpful to continue to engage on the emergent issue, however it is not considered to result in any specific cross-borough issues.

RBKC noted that imposing conditions on new development on retail could be perceived as being unfair and they do not want to discourage development. RBKC have commissioned a Retail and Leisure Needs Assessment and Town Centre Study, which will involve telephone surveying of the residents in the north of Wandsworth, and the results of this will be shared with Wandsworth. LBW have shared information with RBKC on recent applications impacting retail and leisure.

The Wandsworth Draft Local Plan recognises the role that larger centres, such as Kingston, play in the contributing to the needs of the borough, particularly with respect to arts, cultural and entertainment uses. Both boroughs identified the challenges associated with the new Class E on their adopted frontages policies. It is Kingston's intention to bring forward the Kingston Opportunity Area despite uncertainty around the delivery of Crossrail 2, however the boundaries of the OA would not border LBW.

The Draft Local Plan takes a stronger approach to out of centre development, with previous exemptions for smaller units no longer applicable, and the sequential test now applicable in our Focal Points of Activity. This is consistent with the recommendation made in the LBL Issues Document response.

The Draft Local Plan supports the continued implementation of the VNEB OA, including the emerging CAZ retail clusters at Battersea and that at Vauxhall (shared with LB Lambeth). On the latter, the Draft Local Plan states: "The Vauxhall CAZ retail

cluster is primarily located within LB Lambeth, and the Council will work with the borough to deliver ambitions for this cluster, as well as to ensure that development caters for local residents and workers within Nine Elms.”

LBL and LBW agreed to continue to work together on the development and implementation of this potential CAZ retail cluster. The implementation of these CAZ clusters will likely impact centres in Westminster CC, however this is the realisation of a long-term and collaborative effort.

LBW note that the Draft Local Plan seeks to protect Tooting Market as part of any development, including Crossrail 2. LBM note there is an identified opportunity areas related to Crossrail 2 located in Merton, and that LBM are meeting with the GLA to discuss how to progress this.

LBM commented that Colliers Wood is not recognised as district centre in the London Plan, but LBM intend to designate this area as a district centre and expect the area to come forward for redevelopment once existing retail leases have ended in the later 2020s. This is not considered to impact on LBW’s centres

## **Regulation 19**

The Focal Point of Activity designations at ‘Battersea Power Station’ and ‘Nine Elms near Vauxhall’ have been removed. The former is redundant given the designation of Battersea Power Station as a ‘CAZ retail cluster’, whilst the latter has been removed in agreement with LB Lambeth that the potential CAZ Retail Cluster fell entirely within that borough’s borders. Following the adoption of the LB Lambeth Local Plan, which outlines a boundary for the Vauxhall CAZ Retail Cluster (identified as Vauxhall Cross), and reflecting the type of development that is coming forward, LB Wandsworth do not consider it is necessary to identify the ‘Vauxhall CAZ Retail Cluster’ as being located within the boundary of Wandsworth

No representations were received from any neighbouring borough during the Regulation 19 Stage.

At the DtC meeting with the GLA on 15.2.22 LBW provided an update from the Reg 18 that stronger reference has been made to the GLA’s Town Centre Network as well as the Night-Time Classifications, in accordance with the Mayor of London’s comments.

## **4.9 Transport and other Infrastructure**

### **Background**

The Local Plan advocates support for the main ongoing infrastructure projects in the borough, including: the Northern Line Extension to Battersea; the Thames Tideway Tunnel; improved rail links between South London and Heathrow, pedestrian and cyclist bridges, and Crossrail 2 (CR2), together with local station interchange improvements. Other transport infrastructure projects are contained within the Infrastructure Delivery Plan.

For CR2, the Plan recognises that the project may not come forward (and was suspended in November 2020), and therefore incorporates a ‘fallback’ option, that major development sites – particularly in Clapham Junction – would still be suitable for redevelopment even without this infrastructure, albeit on a likely reduced scale.

LBW is committed to working with TfL and neighbouring boroughs on the development of Crossrail 2 and the Northern Line extension to Battersea.

There are new and enhanced facilities for Wandsworth Riverside funded through planning agreement contributions. LIP funding has also been used for access improvements to piers. TfL grant and Community Infrastructure Levy monies have been withdrawn for a footbridge from Lombard Road to Imperial Wharf.

The Local Plan / Area Strategy for Nine Elms promotes the Nine Elms Pimlico Bridge, with the Kirtling Street area of Nine Elms identified as the preferred landing site on the south bank. The bridge will connect the community in Pimlico with the new developments in Nine Elms and create new opportunities for active travel. This is being led by colleagues in Transportation and the Nine Elms team.

### **Key discussion**

At the individual DtC meetings with the neighbouring boroughs LBL stated their focus is on promoting active travel which is being reflected in a similar model in LBW Draft Local Plan.

LBW and WCC discussed the Nine Elms Pimlico Bridge as set out in the LBW Local Plan / Area Strategy which WCC continue to **not** support. Both boroughs agreed to continue to liaise on this issue. Disagreement with respect to ambitions for the bridge is noted.

The GLA noted that the Clapham Junction Opportunity Area is identified within the PLP and therefore boroughs should take confidence from this position. The GLA advised LBW that it would be helpful to define the boundary of the OA and advised on specific wording around the OA. LBW commented that they have resisted the boundary thus far due to uncertainties if CR2 and the language is compliant with the London Plan.

TfL considered the emphasis on Healthy Streets to be positive and highlighted that it would be useful to frame this in the context of the Mayor’s other targets.

TfL noted that there is a point of difference between the London Plan and the draft Local Plan on LP 53 Parking, Servicing and Car Free Development, as the latter requires car free development in PTAL 5 whereas the former sets car free as the maximum parking provision in inner London areas with PTAL 4. TfL recommended that the LBW Local Plan should further clarify parking arrangements around Part B and Part C to align with the local plan.

### **Regulation 19**



A DtC meeting was held with TFL on the 15.2.22 where TFL mentioned that there could be possible changes to the Crossrail Safeguarding Directions and they expect to know more imminently. They will inform LBW of any updates once they receive them.

TFL requested that references to future openings of the Northern Line Extension be removed from the Local Plan which LBW agreed with.

TFL queried the Site Allocations within Opportunity Areas and why they had not included a development consideration that they would be car-free. WBC agreed to investigate whether there are any areas within the Clapham Junction or Nine Elms Opportunity Areas that would not meet the requirements of the existing car free parking policy

### **Next Steps**

TFL explained that they had already prepared their response to the Regulation 19 Consultation which is in agreement and supportive with the majority of what is proposed in the Publication Local Plan.

## **4.10 Waste management**

### **Background**

LBW has published a Waste Technical Study which was completed in 2020, which is available online.

The overall summary position of the report is that the waste apportionment figure will be met within the borough relying on existing sites and the capacity of industrial areas (67.5 ha) to make up the 2.1 ha shortfall.

NB. Western Riverside Waste Partnership comprises of LBW, H&F, K&C, & Lambeth.

### **Regulation 18**

Duty to Cooperate on waste is being led by the Council's waste consultant, Victoria Manning of Vitaka. Evidence has confirmed that as there are no strategic waste exports to WCC, this is not considered a strategic or cross-boundary issue.

Wandsworth's position is consistent with the London Plan and with LBL's response to the Issues consultation.

The GLA noted that it is positive to see the apportionment of waste set out within the PLP recognised within the Local Plan, as well as safeguarded waste sites identified.

The GLA shared concerns over the identified immediate capacity gap and suggested that LBW form part of a joint Waste Plan, in line with para 9.8.7 of the PLP - the example of Westminster was provided, who joined the South East Waste Plan, as there was capacity in Bexley to accommodate Westminster's unmet waste need (new facility proposed by Cory). If this option is not possible, it is advised that LBW look at sites within the borough where the waste needs could be met (e.g., through site

allocations). LBW highlighted that the intention is to accommodate any surplus within the Council's designated industrial locations (SILs and LSIAs) and previous attempts to pool apportionments with neighbouring boroughs were unsuccessful. LBW to consider this.

## Regulation 19

A Duty to Co-operate report on Waste Exports was produced to inform the Reg 19 consultation. This report provides an audit and analysis of the issues raised during the duty to cooperate engagement on waste exports January – March 2021 which formed part of Wandsworth's draft Local Plan Regulation 18 consultation. The Update to the report (April 2022) details the SoCG agreed on strategic waste matters that confirm waste exports with the relevant boroughs.

As part of Wandsworth's duty to co-operate on February 14<sup>th</sup>, 2022, a meeting was held with the Greater London Authority (GLA) to discuss any issues of conformity with the London Plan. LBW stated that waste capacity (Plan identifies gap of 2.1 hectares) is identified on a number of sites and more generally across its industrial areas. If the gap is not met, then this presents difficulties as Wandsworth can only do so much and relies on the private sector to bring forward.

Although no non-conformity issues were raised with regards to the draft Local Plan waste policy LP 13, the GLA requested that Wandsworth explore the possibility of another London Borough helping to meet the identified capacity gap for apportioned waste.

An addendum to the Waste Evidence Base has been produced which sets out justification of Wandsworth's approach to meeting its waste apportionment targets and as part of this justification, assesses each London Borough's ability to help Wandsworth meet its capacity gap.

LBW met with the EA for a DtC meeting on the 22.2.22 where the EA commented that the Local Plan does not include three permitted waste sites. LBW have contacted sites and had said no waste management taking place on site, LBW removed because of this further explained in waste technical paper.

The Council met with the Western Riverside Waste Authority (WRWA) on the 10.3.22 to discuss the WRWA concerns about the impact of the Environment Act 2021 regarding their ability to process all the required materials expected under the statutory duty in the coming years. New facilities will need to be provided and the WRWA are still exploring whether the existing site can support this.

WRWA proposed amendments to the Site Allocations at;

- Western Riverside Waste Transfer Station Site Allocation Boundary (WRWTS) WT11 to include the entirety of the Household Waste Recycling Centre which the Council provisionally agreed to extend the boundary.
- the Feathers Wharf Cluster to include the WRWTS.
- Open Space at Feathers Wharf- WRWA stated that the amount of open space proposed in the Local Plan for Feathers Wharf will make mixed use development unviable.

- Combine Site Allocation NE9 (Kirtling Wharf); and NE11 (Cringle Dock) WRWA: now plan to acquire Kirtling Wharf once it is placed on the market in the coming years. Aspiration to build a new WTS on the southern portion of Kirtling Wharf, then repurpose the northern section of Cringle Dock as a dock.
- Cringle Dock and Kirtling Wharf allocations be identified as one allocation. LBW: these sites are both within the Kirtling Street Cluster.

WRWA to pose these and other matters in their Reg 19 response which the Council acknowledged.

LBW met with Thames Tideway (TT) on the 22.2.22 and agreed with the majority of the issues raised in TT's draft representation and stated that the Council will seek to amend the Plan through modifications at the Examination and would be reflected as such in the response to Reg 19 post submission.

TT had outlined in their Reg 18 representation that they had issues with the Keltbray site allocations, in particular the proposed open space requirements adjacent to the Thames Tideway access shaft. TT requested LBW amend the site allocation boundaries in the Kirtling Wharf cluster to match the current safeguarded wharf boundaries as out of date. LBW agreed to review this as part of the Reg 19 review post submission.

TT were concerned that the local plan does not ensure that the correct provisions exist for protection and access for maintenance of infrastructure at Thames Tideway maintenance shafts and other infrastructure in the area. LBW agreed to investigate where the plan could be improved to provide greater protection for maintenance shafts and infrastructure.

TT requested that the Battersea Ring main site, an area owned by TT is included in the Kirtling Street Cluster. LBW agreed to review this as part of the Reg 19 review post submission.

TT requested that the site allocation for Middle Wharf be amended to allow for additional development to the west. LBW agreed to review this as part of the Reg 19 review post submission.

**Action / further work:**

- LBW will work with GLA and other private individuals to reduce capacity gap.
- LBW will conduct further evidence in exhausting avenues of seeking further waste capacity.
- WRWA are planning to begin pre-application consultations with LBW for separate waste facility developments at Feathers Wharf and at Cringle Dock/ Kirtling Wharf in the coming months and will include their suggested amendments via the Reg 19 consultation

- TT will include their suggested amendments via the Reg 19 consultation and LBW will continue to liaise as part of the response to Reg 19.

## **4.11 Schools and Education**

### **Background**

In line with the requirements of the NPPF the Council works with school promoters, delivery partners and statutory bodies to identify and resolve key planning issues. The Wandsworth Draft Local Plan commits to bringing forward enhanced primary school provision (a new two-form entry school will be provided in Nine Elms, including community space at the identified site C1 of Nine Elms Parkside) in time to meet the need arising from development and ensure the provision is made for potential expansion in future years.

Beyond this additional provision, Wandsworth considers that it is able to meet its needs within its boundaries.

### **Regulation 18**

The Draft Local Plan states that Roehampton University aim to relocate its existing teaching facilities from Roehampton Vale to the RB Kingston upon Thames, and to use the site at Roehampton Vale for student accommodation. It is understood by LBW Officers that this position may be revised, as the University considers its requirements in light of the impact of Brexit and ongoing work on other student accommodation developments.

### **Next Steps**

LBW will update RBKuT on this item as it proceeds.

### **Regulation 19**

No further representation received

## **4.12 Healthcare**

### **Background**

The Council has a good working relationship with the London Healthy Urban Development Unit (HUDU) and the Wandsworth CCG. Following the Issues version of the Local Plan on the 23/6/2020 Wandsworth Officers gave a presentation at Wandsworth borough Estates Meeting on the Reg 18 Local Plan and Site allocations which was followed up with email correspondence confirming information on their proposed site allocation St Georges Hospital Car Park which is an NHS Site.

LBW are working in partnership with St George's Hospital University Hospitals NHS Foundation Trust to support an expansion they have proposed, which is recognised as a new site allocation in the Local Plan – TO2 St Georges Hospital Car Park and adjoining land on Blackshaw Road, Maybury Street, SW 17. This is for mixed use development including residential and expansion of healthcare facilities. There has

been communication throughout the Local Plan process and West London and St George's Mental Health NHS Trust has submitted representations at Regulation 18 and Regulation 19 Stage. HS London Healthy Urban Development Unit (HUDU also submitted representation to support this proposal at Reg 18 Stage.

Both LBW and LBM consider that they can meet their own healthcare needs within the borough. Both boroughs are part of the South West London CCG, and therefore cooperate strategically in this regard.

A new Health Centre at Sleaford Street, secured as part of Battersea Power Station Phase 4a and funding agreement with NHS Property Services, will provide new primary health care facilities to support the predicted new population of c.34,700 and the existing residents, thereby contributing to the health and wellbeing of local communities. In addition, the Council will work in partnership with the NHS to deliver additional health care at Nine Elms Square.

### **Next Steps**

The Council agreed to continue to keep HUDU and the Wandsworth CCG informed throughout the Local Plan process. Specifically, information will continue to be shared with regards to the location and amount of development planned in the borough.

## **4.13 Environment and green infrastructure**

### **Background**

The Council declared a Climate Change Emergency in 2019, and in response has developed the Wandsworth Energy and Sustainability Strategy (WESS). This is a cross-cutting strategy on addressing climate change – which focuses both on internal and external actions, including Carbon neutrality as an organisation by 2030 and zero carbon by 2050.

In line with this, the Draft Local Plan takes forward the London Plan's zero carbon approach with respect to major sites, and will introduce more rigorous requirements for developments on smaller sites (all new residential at least 35% reduction above TER on-site).

LBW has undertaken an update of the borough's Open Space Strategy in liaison with Enable (who operate Wandsworth's parks and sports facilities)

The Draft LP incorporated an Urban Greening Factor (UGF). This relies on the values established in the draft London Plan, rather than a local formula.

### **Regulation 18**

LBM and LBW have a shared strategic flood risk assessment that was commissioned and finalised. There are no further cross-boundary issues due to this joint work.

No climate change cross boundary issues were raised during the DtC meetings with neighbouring authorities.

Wimbledon and Putney Common border Kingston upon Thames, and it was recognised that there is scope for cross-borough alignment. In LBW, the approach to the protection and enhancement for these types of open space has not changed and the findings from the Open Space Study and the draft Playing Pitch Strategy were offered to be shared. RBKuT are similarly progressing updates to their Playing Pitch Strategy and recognise that the Open Space Study is now quite dated and will need to be updated. Both boroughs agreed to continue supporting green links and green chains that cross over the boundary.

Lambeth highlighted at the DtC meeting those areas of green space deficiency or high value use – cross boundary usage such as Tooting Bec or Clapham Common for Lambeth residents or Brockwell Park for Wandsworth. Joint working on the continuity of the Thames Path was supported by both boroughs. No new strategic or cross-boundary issues identified or anticipated.

## **Regulation 19**

At the DtC meeting on 22.2.22 the EA discussed the Regulation 18 comments they had previously provided and where there were outstanding issues that had not been clarified within the Regulation 19 Plan. These issues mainly related to the layout of the Fluvial Floodplain compensation levels and biodiversity and estuary edge definition within the policy which the council agreed to consider wording.

## **Next Steps**

To informally respond to the EA Regulation 19 Representations.

## **Built Environment**

### **Tall buildings**

#### **Background**

LBW commissioned the Urban Design Study (UDS) to develop a better understanding of the values, character and sensitivity of different parts of the borough. The study identified 7 high level places and 21-character areas in the borough. This guidance has been embedded in the area strategies for different parts of the borough. In such cases, the study recommended that existing tall buildings should not be seen as justification for the creation of further landmark tall buildings or attract the development of a tall building cluster. The UDS recommended revising the currently adopted tall buildings policy.

A substantial part of the Wandsworth's Riverside has been identified as having 'opportunities for tall building clusters and/or landmarks' or 'Opportunities for tall buildings within town centres and along strategic routes'. Development proposals involving tall buildings will be assessed against the tall buildings criteria set out in the emerging London Plan, and additional Wandsworth-specific criteria listed in policy LP 4 Tall Buildings. Although, tall buildings in these locations are likely to impact on views from the other Borough's, it is not considered that the impact would be unacceptable given that proposals will need to comply with the criteria set out in the policy.

## **Reg 18 Stage**

The draft policy identifies a number of local definitions of “tall” (informed by the local prevailing height) and identifies broad locations across the borough where tall buildings may be appropriate. There are three types of tall building zones: opportunity for tall building clusters, opportunities for tall buildings in town centres, opportunity for tall buildings within a local context. Maximum heights are not set.

RBKC stated at the individual DtC meeting that there was no resident opposition to previous tall building proposals across the river in LBW.

Kingston emphasised that the boroughs have a short boundary, and thus the proposed tall building zones are not considered to cause a strategic or cross-boundary issue.

At the DtC meeting on the 15.2.21, HE discussed some of their concerns with the policy such as the potential interpretations of LBW Draft Local Plan tall buildings policy, stating that more clarification is needed and that the plan would benefit from having more development and design detail. LBW explain the justification of such policy and why areas have been identified.

HE viewed Part D of the policy as a risk to heritage and potentially not in conformity with the London Plan and recommended a change of wording to still include Part D but remove the blanket policy support. LBW stated would review the evidence base to consider this approach.

HE noted the London Plan’s role in design led approaches and stated they were looking into producing more guidance around viability testing. LBW mentioned that a Whole Plan Viability Assessment would be conducted to consider if policies are viable.

The GLA welcomed the approach to defining ‘tall buildings’ for specific localities and the associated mapping is welcomed however the approach in the draft plan will need to revise to align with the SoS Direction.

The GLA shared concerns over Part D.2 of Policy LP 4 as it could provide a loophole for proposals to come forward for tall buildings in any locations in the borough. The GLA would prefer to see LBW setting out maximum heights within the policy in order to create certainty for the LPA and developers, as set out within line Policy D9 Part B.2.

GLA recommended that LBW reference to the Westminster WHS within the Tall Buildings policy (LP 4) and potentially as a distinct heritage policy. LBW highlighted that Historic England had accepted the current policies however an inclusion within supporting text could be made. LBW will also reference to Historic England’s revised Advice Note on Tall Buildings once published.

## **Regulation 19**

The Reg 19 approach to tall buildings changed for the Reg 19 stage. This was due to the emergence of the newly published London Plan and the further work and different approach needed to recognise a shift in London Plan Policy following the SoS Direction.

At Regulation 18 HE raised concerns about the areas for tall buildings and the extent of the zones. LBW has revised its approach since Reg.18 to account for the policy advice in the London Plan. The tall-building definition has been revised as 7 storeys or more, or 21m or over.

LBW has also amended policy to include mid-rise buildings which includes a mid-rise building definition of 5 storeys or over or 15m. The approach adds further definition and guidance to what is considered as appropriate building heights in the borough.

Defined tall building zones and proposals will not be permitted outside zones and only in zones where developments meet criteria in Policy LP 4.

Appendix 2 sets out an appropriate height range, which cannot be exceeded. The Urban Design Study (UDS) contains more info about this and character study/sensitivity analysis – taken into account heritage assets and used to define zones. Information in UDS should be used as material consideration on site allocations and used as part of pre-apps. Approach is in accordance with London Plan, and (further to a recent duty to co-operate meeting) GLA are in agreement.

All work has also been used to provide a design-led approach to site allocations and capacity. LBW's HELAA explains this, and Appendix H in UDS demonstrates how methodology of UDS has been applied to HELAA. Housing and employment figures have been considered, and LBW can meet its housing targets by using design-led approach.

HE responded at the DtC meeting to this update and agreed with the approach to tall buildings which addresses the main concerns from HEs previous Reg 18 comments.

They did state that in Appendix 2 of the Reg.19 Plan, some of the height parameters are quite tall. Suggested that it may be helpful to refer to the UDS at Local Plan para 23.15, reminding people to look back at character.

HE stated that they advocate the proportionate approach and to focus on highest risk and sensitivities. HE will look in further detail (through their Reg.19 representations). HE agree broadly with the approach.

LBW amended policy LP 3 to account for Westminster World Heritage Site and LP 4 regarding modelling. This was discussed with the EA regarding the revised approach to tall buildings and the associated UDS which has been revised to account for the new London Plan.

The GLA noted that there are no conformity issues with the approach of LP 4 and welcomed the clear approach regarding the specific locations of such tall buildings, being those set out on in designated zones. They also welcomed the clear whole-borough definition of a tall building proposed and the additional policy approach of defining 'mid-rise' buildings of 5 storeys (or 15 metres) which will provide welcome clarity.

## **5. Statement(s) of Common Ground**

5.1 Paragraph 27 of the NPPF introduced (as part of the DtC process) a requirement for strategic policy making authorities to, 'prepare and maintain one or more statements of common ground (SoCG) documenting the cross-boundary matters



being addressed and progress in cooperating to address these.’ This is required ‘in order to demonstrate effective and on-going joint working.’ The purpose of the SoCG is to document cross-boundary matters and progress in cooperating to address them. It demonstrates that the Local Plan is based on effective and ongoing cooperation and that LPAs have sought to produce strategies that as far as possible are based on agreements with other authorities. The SoCG should be produced, published and kept up to date by the signatory authorities as an accessible and public record of where agreements have or have not been reached on cross boundary strategic issues.

5.2 The SoCG addresses strategic spatial policies directly by collaboration with the relevant Local Planning Authorities. The London Boroughs listed below have been included as they are immediately adjacent to the London Borough of Wandsworth (LBW). The Council has engaged with them on strategic matters through an iterative process.

5.3 The Wandsworth SoCG has been prepared and signed by Wandsworth Council in agreement with the following parties:

- London Borough of Hammersmith and Fulham
- Royal Borough of Kensington and Chelsea
- Royal Borough of Kingston upon Thames
- London Borough of Lambeth
- London Borough of Merton
- London Borough of Richmond upon Thames
- Westminster City Council

5.4 The Duty to Cooperate Statement should be read in conjunction with the Statements of Common Ground that the Council has prepared. For further information please see the SoCG document.

## **6. Engagement with Waste Planning Authorities**

6.1 LBW has published a Waste Technical Study (Wandsworth Local Plan Review: Waste Evidence Base (2020)). The conclusion of the Waste Technical Study is that waste need, including the Borough’s apportionment target, will be met within the borough through capacity at existing sites and directing new waste facilities to safeguarded industrial areas to make up the shortfall.

6.2 A Duty to Cooperate Report on Waste Exports was finalised in May 2021 and is available on the Council’s website. The report provides an audit and analysis of the issues raised during the Duty to Cooperate engagement on waste exports between January and March 2021, which was undertaken alongside Wandsworth’s consultation on the draft Publication Local Plan (Regulation 18). Wandsworth has

identified sixteen waste planning authorities (or groups of WPAs) who receive of 'strategic' amounts of waste exports from the Borough (i.e., an amount of waste over certain thresholds which have been agreed by waste planning authorities across the wider south east). Wandsworth has engaged with each of these authorities, or groups of authorities, to establish if there are any planning reasons why similar waste exports from the Borough cannot continue over the plan period.

6.3 Wandsworth has prepared Statements of Common Ground with each of the WPAs who consider waste exported from Wandsworth to their area to be a strategic issue. These are published as independent SoCGs from those addressing other strategic issues (where appropriate), and include neighbouring Merton and Hammersmith and Fulham, alongside:

- London Borough of Bexley
- London Borough of Havering
- Hertfordshire County Council
- Kent County Council
- Medway Council
- Old Oak and Park Royal Development Corporation
- Surrey Country Council
- Thurrock Council

## **7. Conclusion**

7.1 During the revision of the Draft Local Plan, the Council has engaged very actively with its stakeholders and partners and discussed with them all strategic matters. The Draft Local Plan published under Regulation 19 (Town and Country Planning Act (Local Planning) (England) Regulations 2012) reflects the views and comments received during the engagement and cooperation process.

7.2 This report, the Consultation Statement and the Statements of Common Ground demonstrate how the council has complied with its Duty to Cooperate and will be used during the Examination in Public to show that the Draft Local Plan 2023-38 is based on effective joint working across local authority boundaries.



**Appendix A**  
**Schedule of meetings with statutory stakeholders**

	Organisation	Correspondence sent	Meetings/events	Correspondence Received (Y/N)	Notes
<b>Prescribed Bodies</b>					
1	Environment Agency	DtC meeting email invite –21/12/2020	5/4/19 Meeting with EA and LBW officers. (Wandsworth Town Hall)		
		Regulation 18 email 4/1/21		Y	
		Regulation 19 email 10/1/22		Y	
		DtC meeting email invite – 25/01/2022	22/02/2022 Meeting (via MS Teams) with EA and LBW officers		
2	Historic England	DtC meeting email invite –21/12/2020	4/2/21 Meeting (via MS Teams) on Reg 18 & DtC.		

			Historic England and LBW officers. 25/5/21 Meeting (via MS Teams) Discussing tall buildings policy (GLA officers also present)			
	Regulation 18 email 4/1/21			Y		
	Regulation 19 email 10/1/22			Y		
	DtC email invite – 25/01/2022		16/02/2022 Meeting (Via MS Teams)			
	DtC meeting email invite –21/12/20			Y		
3	Natural England			Y		

		Regulation 19 email 10/1/22		N	
		DtC email invite 25/01/22		Y	
4	The Aviation Authority	Regulation 18 email 4/1/21		N	The Council considers that there are no strategic issues of relevance to discuss with the Civil Aviation Authority. The CAA is a statutory consultee and is consulted on all the Council's planning policy documents, including the Local Plan; however, it was not thought to be necessary to hold specific duty to co-operate meetings or other engagement activities beyond the normal statutory consultation procedures with the CAA.
		Regulation 19 email 10/1/22		N	
	Homes England (previously HCA)	Regulation 18 email 4/1/21		N	
		Regulation 19 email 10/1/22		N	

6	<p>Clinical Commissioning Groups (CCGs) – Wandsworth Borough Estates Group</p>	<p>Regulation 18 email 4/1/21</p>	<p>LBW gave presentation on Local Plan at Wandsworth Borough Estates Workshop Monday 2 /12/2019, 1.30-4pm St George's Hospital, Tooting.</p> <p>WW Health and Wellbeing Board seminars - 20/02/2020 – Health and Wellbeing in the Local Plan. Follow up 13/05/2020 (informing the Reg 18) Local Plan future Direction Wednesday 16 October 2019 and March 2019</p>	<p>Y</p>	
		<p>Regulation 19 email 10/1/22</p>	<p>23/6/2020 Presentation at Wandsworth borough Estates Meeting – Reg 18 Local Plan and Site allocations (followed up with email correspondence confirming information on NHS Site Allocations 01/7/2020)</p>	<p>Y</p>	

			August – September 2020 Email correspondence with NHS St Georges Hospital Estate Strategy regarding St Georges Hospital Estate Strategy and Site Allocation.			
			WW Health and Wellbeing Board seminars - 20/02/2020 – Health and Wellbeing in the Local Plan. Follow up 13/05/2020 (informing the Reg 18) Local Plan future Direction Wednesday 16 October 2019 and March 2019			
Transport for London	DtC meeting email invite –21/12/20		30/4/19 Meeting with LBW and Cross rail 2 officers (55 Broadway, London)  5/2/21 Meeting (via MS Teams) on Reg 18 & DtC. (TfL and LBW).  15/02/2022 Meeting (via MS Teams)	Y		
				Y		



		Regulation 18 email 4/1/21				
		Regulation 19 email 10/1/22		Y		
		DtC email invite 25/01/22		Y		
	Highways England (formerly Highways Agency)	Regulation 18 email 4/1/21		Y		While the Council considers Highways England to be an important duty to cooperate body, due to the nature of the development sites in the borough, which have very limited impact upon the areas under the remit of Highways England, the Council has not approached them specifically in relation to the Duty to Co-operate. However, Highways England was consulted on all public consultations relating to the Local Plan.
		Regulation 19 email 10/1/22		Y		
9	The Marine Management Authority	Regulation 18 email 4/1/21	MMO marine planning event -18/2/20, (Nobel House, Westminster.)	Y		

		Regulation 19 email 10/1/22		Y	
10	The Office of Rail Regulation	Regulation 18 email 4/1/21		N	The Council considered that there were no strategic issues of relevance to discuss with the Office of the Rail Regulation, which is a statutory consultee and is consulted on all the Council's planning policy documents, including the Local Plan; however, it was not thought to be necessary to hold specific duty to cooperate meetings or other engagement activities beyond the normal statutory consultation procedures with this Office.
		Regulation 19 email 10/1/22		N	
11	Greater London Authority	DtC meeting email invite –21/12/20	2/12/19 Employment land stakeholder consultation workshop (Wandsworth Town Hall)  26/02/20 Climate emergency borough workshop (City Hall)	Y	

12	Integrated Transport Authority	Regulation 18 email 4/1/21 Regulation 19 email 10/1/22 DtC email invite 25/01/22 Regulation 18 email 4/1/21	22/2/21 Meeting (via MS Teams) with GLA and LBW officers. DtC and Reg 18 Plan. 25/05/21 Meeting (via MS Teams) Discussing tall buildings policy (Historic England also present) 26/05/21 Meeting (via MS Teams) Discussing industry and waste policy 14/02/2022 Meeting (via MS Teams)	Y Y Y Y	
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The Council is the Highways Authority for the area; the Council's transport planners have been involved in the

		Regulation 19 email 10/1/22			Y	preparation of the Local Plan including site allocations
<b>Additional Bodies</b>						
13	Port of London Authority	Regulation 18 email 4/1/21	26/2/19 DtC meeting with LBW and PLA officers (Wandsworth Town Hall)		Y	
		Regulation 19 email 10/1/22			Y	
14	LEP	Regulation 18 email 4/1/21			N	
		Regulation 19 email 10/1/22			N	
<b>Neighbouring Authorities</b>						
15	Hammersmith & Fulham	DtC meeting email invite – 18/12/20 and 9/2/21	25/2/21 Meeting (via MS Teams) with LBW officers. DtC and Reg 18 Plan.		Y	

		Regulation 18 email 4/1/21		N	
		Regulation 19 email 10/1/22		N	
16	Kensington & Chelsea	DtC meeting email invite –18/12/20 and 9/2/21	24/2/21 Meeting (via MS Teams) with LBW officers. DtC and Reg 18 Plan.	Y	
		Regulation 18 email 4/1/21		N	
		Regulation 19 email 10/1/22		N	
17	Kingston upon Thames	DTC meeting email invite –18/12/20  Regulation 18 email 4/1/21  Regulation 19 email 10/1/22	27/2/21 Meeting (via MS Teams) with LBW officers. DtC and Reg 18 Plan.	Y	
		Regulation 18 email 4/1/21		N	

		Regulation 19 email 10/1/22			N	
18	Lambeth	DtC meeting email invite –18/12/20	25/2/21 Meeting (via MS Teams) with LBW officers. DtC and Reg 18 Plan.		Y	
		Regulation 18 email 4/1/21			Y	
		Regulation 19 email 10/1/22			N	
19	Merton	DtC meeting email invite –18/12/20	22/2/21 Meeting (via MS Teams) with LBW officers. DtC and Reg 18 Plan.		Y	
		Regulation 18 email 4/1/21			N	
		Regulation 19 email 10/1/22			N	
20	Richmond upon Thames	Regulation 18 email 4/1/21			Y	Richmond and Wandsworth have had a shared staffing arrangement in place. As a result, planning officers within Richmond and Wandsworth work closely, sharing the same Spatial Planning and Design

							Team Manager. Joint team meetings are held throughout the year where DtC issues are also discussed.
21	Westminster	Regulation 19 email 10/1/22			N		
		DtC meeting email invite –18/12/20	15/1/21 Meeting (via MS Teams) with LBW officers. DtC and Reg 18 Plan.		Y		
		Regulation 18 email 4/1/21			N		
		Regulation 19 email 10/1/22			N		

**APPENDIX B Minutes from Duty to Cooperate prescribed bodies**





# Meeting Agenda

<b>Partner</b> Historic England	<b>Topic</b> Duty to Cooperate	
<b>Date</b> Wednesday, 16 February 2022	<b>Location</b> MS Teams	<b>Time</b> 11:00 – 12:30

## Meeting Attendees

Name	Organisation
Adam Hutchings	LB Wandsworth
Catriona Ramsey	LB Wandsworth
Richard Crutchley	LB Wandsworth
Louis Osman	LB Wandsworth
Katie Parsons	Historic England

## Agenda Items

1. Introductions
2. Local Plan update –
  - LBW:** intending on submitting Plan and associated documents in late April. LDS is being revised. Expecting EIP for summer 2022 with Inspector’s Report in Autumn and adoption in spring/summer 2023. No SPDs currently being progressed.
3. Duty to Cooperate: strategic / cross-boundary issues (selected based on Historic England’s Reg.18 comments):
  - a. **Urban design, a design-led approach & tall buildings** (Placemaking - Area Strategies and Site Allocations; Policy LP3 The Historic Environment; Policy LP4 Tall and Mid-rise buildings); role of the Urban Design Study
 

**LBW:** In Reg.18 version HE raised concerns about the areas for tall buildings and the extent of the zones. LBW has revised its approach since Reg.18 to account for the London Plan. The tall-building definition has been revised as 7 storeys or more, or 21m or over.

Mid-rise buildings are also now considered within Policy LP4, which includes a mid-rise building definition of 5 storeys or over or 15m or more. The approach adds further definition and guidance to what is considered as appropriate building heights in the borough. The policy approach defines tall and mid-rise building zones and states that proposals will not be permitted outside zones and only in zones where developments meet criteria in Policy LP4.

Appendix 2 sets out an appropriate height range for each zone, which should not be exceeded. The Urban Design Study (UDS) contains more info about this and character study/sensitivity analysis – which takes into account heritage assets and was used to define zones. It is anticipated that information in UDS should be used as material consideration on site allocations and other relevant applications plus pre-apps. Approach is considered to be in accordance with London Plan, and (further to a recent duty to co-operate meeting) GLA are in agreement.

All work has also been used to provide a design-led approach to site allocations and capacity. LBW’s HELAA explains this, and Appendix H in UDS demonstrates how methodology of UDS has been applied to HELAA. Housing and employment figures have been taken into account, and LBW is forecast to meet its housing targets as set out in the plan by using a design-led approach to capacity analysis.

**HE:** agree with the approach to tall buildings, and it addresses HEs comments. New definitions are really sensible. Part B, C and D has more clarity about where buildings can go and cumulative effects. Concerns of Reg 18 stage have been addressed.

In Appendix 2 of the Reg.19 Plan, some of the height parameters seem quite tall. Would perhaps be helpful to make reference to the UDS at Local Plan para 23.15 and LP4, reminding people to look back at character so as not to assume that heights identified are acceptable carte blanche.

**LBW** – applications should be reviewed in consideration of the UDS and amendments to be reviewed as part of Reg 19 response.

**LBW** – discussed how heritage considerations had been taken into account. Additional heritage guidance was added, where considered necessary, to the design requirements section of the Site Allocations for Reg 19.

**HE** – advocate proportionate approach and to focus on highest risk and sensitivities. HE to review further detail through their Reg.19 representations. HE are in broad agreement with the approach.

**b. The Historic Environment**

**LBW:** Policy LP3, Part E - In the Reg.19 Plan, as a result of Reg 18 reps, LBW have aligned with NPPF, and use term 'refused' rather than 'resisted'. Policy wording generally strengthened. HE supportive of these changes.

**HE** – Welcome inclusion of new table (Table 14.1) on local views, as well as changes to Policy LP3, Part I on climate change adaptation. Discussed mal-adaptation in relation to ground source heat pumps installation to be addressed through reg 19 reps.

**c. Housing (Small Sites and Housing Capacity)**

**LBW:** LP7 (Residential development on small sites) - HE had suggested at Reg 18 stage that the wording for garden development wasn't strong enough. LP7(E) has been revised slightly to be in line with a presumption against development on garden space. Loss of garden space would now only be acceptable in exceptional circumstances where the proposal is for the comprehensive redevelopment of a number of whole land plots. The justification for this is to avoid new open space requirements preventing such comprehensive development and the quantum of open space wouldn't be lost.

**LBW:** Comprehensive redevelopment would take into account all of the criteria that a new development has to comply with and would likely only apply to masterplan developments such as the Wandle Delta Masterplan SPD Area. Gardens and landscaping would be considered together as part of any such development.

**LBW:** The Urban Greening Factor would also set out requirements for new developments.

**HE:** Discussions held with the GLA about the Urban Greening Factor. Concerned too much of a focus is being placed on urban greening and not Green Infrastructure which is considered to be more meaningful.

**LBW:** Scale of development will play a role in this as the Wandle Delta Masterplan SPD area is planning for a new park and new infrastructure to open up the River Wandle with green spaces.

**HE:** Queried whether the Wandle Delta Masterplan SPD area would lead to the loss of residential garden space.

**LBW:** Unlikely as very limited if any existing residential garden space, but explained that if there was any loss then it would be replaced in a different place or a different form as part of a comprehensive redevelopment.

**d. Climate change**

**LBW** – The comments from HE to the Regulation 18 stage were supportive generally. It was suggested by HE the Local Plan should go further on the importance of retrofitting, and existing building stock. For Reg 19, LBW have added in further text which responds to HE comments and also linked to circular economy principles.

Comments from HE on the whole building approach have been incorporated into the background text.

**HE** – pleased with all amendments and only comment is request to add sentence about mal-adaptation.

**e. Other strategic issues of relevance**

**HE** – still to review the HELAA to understand context of how the UDS was used to calculate capacity. Any comments will be raised as part of the Reg 19 response.

4. Next Steps / Statement of Common Ground

SoCG will be drafted and circulated for agreement and submitted to PINS.

5. AOB

Minutes of the previous meeting, February 4, 2021



# Duty to Cooperate Meeting Minutes

<b>Partner</b> Historic England	<b>Topic</b> Duty to Cooperate	
<b>Date</b> Thursday, 04 February 2021	<b>Location</b> MS Teams	<b>Time</b> 11:00 – 13:00

## Meeting Attendees

Name	Organisation
Adam Hutchings (AH)	LB Wandsworth
Emil Ancewicz (EA)	LB Wandsworth
Alisha Levermore	LB Wandsworth
Barry Sellers	LB Wandsworth
Katie Parsons	Historic England

## Agenda Items

1. Introductions
2. Local Plan update
  - **LBW** provided update on Regulation 18 ‘Pre-Publication’ draft Local Plan. For more detailed information, please visit [the Council’s website](#). Points of note raised:
    - Following the completion of an ‘Issues document’ Wandsworth has been conducting a full review of the Local Plan.
    - Wandsworth have conducted an [Urban Design Study](#) to establish a greater focus on urban design and identify locations for tall buildings. This study informed the draft Local Plan, which is quite different to the adopted Local Plan due to a greater focus on placemaking. The plan sets out the vision, objectives, spatial strategy borough-wide policies, and also includes 7 Area Strategies, 2 overarching Area Strategies and 71 Site Allocations.
    - The place-based approach of the plan is an integrated framework based on the themes of Placemaking, Smart Growth, and People First objectives. **LBW** have also produced Area Strategy summaries for the public.
    - The majority of the Site Allocations within the documents are located within the spatial strategy areas, and each of the site allocations contains information on development considerations and design requirements, with the latter reflecting the recommendations of the Urban Design Study. The character of the borough and historic environment have been embedded into these strategies reflecting the latest thinking.
    - **LBW** will publish a Housing and Economic Land Availability Assessment. More information on how sites were considered will be included in the next stage of the Housing and Economic land availability assessment.
    - The ambition is to get the Regulation 19 to the September committee, and therefore to consult on this in the autumn 2021. The Plan will be submitted to PINS in spring 2022, and adoption hoped for in spring/summer 2023.
3. Duty to Cooperate – strategic issues:
  - a. *Urban Design Study*

- **LBW:** The Urban Design Study significantly influenced the draft Local Plan. It was developed to better understand the urban form and structure of the borough. It provides a townscape character assessment alongside an assessment of the borough’s capacity for tall buildings and small sites.
- **LBW:** The process undertaken is grounded in industry guidance set out by the Landscape Institute, Natural England, and the GLA. It's fully compliant with policy D1 of the emerging London Plan. It also complies with the intent of the Historic England Advice Note 4, which advocates using character assessments to guide the identification of tall building zones.
- **LBW:** The Urban Design Study divides the borough into seven high level places which are then further divided into 25 character areas; the boundaries of which were informed by community engagements (public consultation in September 2020 with 700 responses). Each character area has its own dedicated profile which describes the townscapes and key values of the area, and also any negative qualities. Each character area includes a map, which gives a broad overview of the area and shows the locations of listed buildings, registered parks gardens, conservation areas, protected views, etc. Each profile includes a set of high-level design principles for new development to make sure that the key values of the area are preserved and where possible enhanced.
- **LBW:** Part 2 of the Urban Design Study considers the capacity for growth of the borough, specifically in relation to tall buildings and small sites. It includes an analysis of the sensitivity of the borough, the probability of change and capacity for growth, and identifies locations which are best suited to accommodating growth in a way which does not adversely affect the character of places, especially those which have high sensitivity to growth.
- **LBW:** The new Local Plan recognises that if we want to achieve a design-led development and create a positive framework for managing heritage, these themes need to inform the direction of the entire local plan and be properly integrated rather than being confined to a single heritage or design policy.
- **LBW:** The study has identified that there are areas where character is fragmented and in need of enhancement and where there are factors which weaken the sense of place. The Local Plan has captured these recommendations in targeted area strategies. The Plan directs development to areas where the existing character is fragmented, and to areas which are least likely to be constrained by a significant amount of heritage assets. Site allocations now also include more site-specific design guidance to show how the design of new developments should address the constraints of different areas.
- **LBW:** The Urban Design Study further provides a high-level overview of opportunities for smaller sites.
- **LBW:** The Urban Design Study recommended updating our approach to tall buildings. The variety in character and sensitivity to growth means that the capacity for tall buildings also varies across the borough. The differences in character also mean that the height at which a building is considered “tall” varies across the borough.
- **LBW:** The study defined tall buildings in Wandsworth as either eight stories or taller, or those which are 50% higher than the prevailing height of the relevant character (sub-)area. The study identified the prevailing height of each character area, and where there are significant variations in prevailing height within a specific character area, the area was divided further into smaller sub areas, so that each has its own prevailing height.
- **LBW:** In line with the London Plan and Historic England guidance, which both advocate adopting a plan-led approach to managing tall buildings, the study identified where tall buildings may be appropriate. These include 3 different zones: opportunities for tall building clusters and landmarks; opportunities for tall buildings within town centres and along strategic routes; and, opportunities for tall buildings in a local context.
- **LBW:** The study also provides detailed guidance for each character area in terms of how massing should be dispersed, and what the key constraints area. In most cases, it doesn't set out a maximum height.

*b. Tall buildings policy*

- **LBW** outlined Parts A, B, C, D, and E of draft Local Plan policy LP4 Tall Buildings.
- **HE** highlighted concern about the potential interpretation of the tall buildings policy. More clarification would deal with this, with a few more explicit statements in the plan as to how the policy should be interpreted. In particular, there is a concern for the identified blanket areas where tall buildings may be appropriate, and that some areas appropriate for tall buildings are immediately adjacent to areas of sensitivity. This is where the plan would benefit from having more development and design detail, such as where in those appropriate areas more height could be accommodated and where could substantial buildings be accommodated with mitigation. This could be dealt with by explicitly stating the Council's interpretation is that this does not mean everywhere in those areas is appropriate.
- **LBW:** It is important to note that lot of these areas are built out and that that is part of the justification behind why these areas have been identified. This would help emphasise the point that cumulative harm needs to be taken into account.

- **HE:** It would be useful to know how the Council would deal with the redevelopment of some existing tall buildings. How does the council expect new developments to deal with some of the harm that existing development have already caused, how does the draft Local Plan proposes to prevent that harm being perpetuated or repeated? It would be helpful if the plan explained the Council's aspiration for dealing with buildings that are already harmful.
- **HE:** The Council should provide details as to whether any modelling or testing was done to broadly assess heights.
- **HE** welcome different definitions of "tall".
- **HE:** In terms of Part D of the policy, Historic England have argued that similar policies in Lambeth and Westminster make the plans unsound. This is currently an unresolved matter. Historic England have signed statements of common ground which include statements of uncommon ground on the element of policy support for tall buildings outside areas considered as appropriate. The borough has done evidence to show that these areas are not appropriate for tall buildings, and thus these areas should be fully protected. Additionally, the emerging London Plan is very clear when it notes that tall buildings can only be approved in areas identified as appropriate.
- **HE:** Historic England appreciates that boroughs do not have the resources to test every single site and do not want to prevent developments coming forward. However, Historic England's view is that Part D poses a risk to heritage, potentially is not in conformity with the London Plan.
- **HE:** Historic England recommend to Lambeth and Westminster a change of wording – i.e. to still include Part D, but to scale it back to say further sites may come forward in subsequent master plans and SPDs that will allow tall buildings to come forward beyond the areas identified as appropriate, whilst removing the blanket policy support for anything anywhere in the borough potentially being suitable providing flexibility for any follow-on documents. This removes the risk of those documents not being in compliance with the strategic plan.
- **LBW:** Wandsworth do not have the evidence base to show that all areas are specifically not appropriate, which is why the policy wording is as proposed. Due to this the language currently uses 'likely to be inappropriate'. Wandsworth will examine Lambeth and Westminster's approaches and take these comments on board to assess.
- **HE:** it is important to ensure there are no loopholes, so that the objectives and vision of the plan are not undermined by unforeseen inadvertent interpretations.
- **LBW:** Part E of the policy makes the link to the Urban Design Study noting that buildings should be guided by the height identified in the Urban Design Study. Wandsworth highlighted concerns for the status of the Urban Design Study as not an SPD.
- **HE:** Whilst it is not an SPD or a DPD, having it appear not in the supporting text but in the policies themselves with a link like Wandsworth's Part E, has worked and been accepted in the past.
- **LBW:** There is a number of design-led massing scenarios for selected sites, The scenarios have not been viability tested or tested against other planning considerations.
- **HE:** Noted the importance that it is the London Plan that has directed the Council to produce design led approaches. Historic England are looking into viability testing guidance, and will be producing more guidance.
- **LBW:**
- **HE** gave an update on the Historic England's revised Tall Buildings Advice Note. Work on this document has been paused, as a separate piece of research on tall buildings is being undertaken, and therefore Historic England are waiting to be able to incorporate these recommendations. An appendix will also be added with additional advice on a good tall building study. Draft will likely be available within the next few months.

*c. Historic Environment policy*

- **LBW** outlined Parts A – H of policy LP3 The Historic Environment.
- **HE** suggested minor changes to the wording of different parts of the policy. Historic England to provide a write up with recommendations for alternative wording to ensure compliance with legislation.
- **HE** noted that Part B of the policy does not need to state 'the significance of' the outstanding universal value. Katie will provide a write up with recommendations for alternative wording to ensure compliance with legislation.
- **HE:** It is important to clarify where the strategic and locally important views are identified.
- **LBW:** The Council has an adopted SPD which includes the local views. The strategic views are shown on policy maps.

- **HE:** In the supporting text it might be useful to say, “as shown on the policy map or in these supporting documents”. And in the supporting text it might be useful to say that over the next plan period, it might be that new views are identified, or certain views are removed to ensure clarity and flexibility going forward.
- **LBW:** Question about the status of the of valued views and vistas indented in the Urban Design Study.
- **HE:** It would be suitable to clarify this in the supporting text of the relevant policy.
- **HE:** Regarding Part D, it is important to avoid demolished plots do not become redeveloped for a long time. It could be worth adding a requirement for a legal agreement or condition put on to say that it cannot be demolished unless approved permission for re-build will be implemented.
- **HE:** Regarding Part E, Historic England discourage duplicating what's in the NPPF, but if it is in it is important to get the wording right. In terms of ‘substantial harm or total loss of designated assets will be resisted’, it should be wholly exceptional to reflect what the NPPF test is. At the moment it is more flexible than the NPPF, and therefore the wording needs examining. When noting substantial harm to the lower assets that should be exceptional.
- **HE:** Regarding Part F, Historic England view that it is very pleasing to see that this is in there.
- **HE:** Regarding Part G, Historic England advice this is in policies and are very happy to see it included.
- **HE:** Regarding Part H, Historic England suggested to make a strong a link to Heritage at Risk register. If there is a building on the Register, the Council could set it out in the policy that the Council would expect this to be dealt with by a development.

4. Statement of Common Ground

- **LBW** will be drafting a Statement of Common Ground. The Statement of Common Ground will be a draft which can be revised as new policies are modified and issues resolved.
- **HE** will write everything up in response to Wandsworth and is keen to support Wandsworth to work on the Plan.

5. AOB

- None identified.

## Meeting Agenda

<b>Partner</b>	<b>Topic</b>	
Greater London Authority	Duty to Cooperate	
<b>Date</b>	<b>Location</b>	<b>Time</b>
Monday, 14 February 2022	MS Teams	14:00 – 16:00

## Meeting Attendees

Name	Organisation
Adam Hutchings	LB Wandsworth
Richard Crutchley	LB Wandsworth
Robert Wellburn	LB Wandsworth
Eoghan McConville	LB Wandsworth
Catriona Ramsey	LB Wandsworth
Louis Osman	LB Wandsworth
Victoria Manning	Vitaka Consulting (OBO LB Wandsworth)
Nina Miles	Greater London Authority
Hassan Ahmed	Greater London Authority
Jorn Peters	Greater London Authority
Mikyla Smith	Greater London Authority
Rohan Ranaweera	Greater London Authority

## Agenda Items

### 1. Local Plan update, including Supplementary Planning Documents (SPDs)

LBW provided an update on the Local Plan's progress. LBW were revising the Local Development Scheme to account for slight change to Reg 19 consultation. Reg 19 concludes on 28<sup>th</sup> Feb, with submission of final version anticipated late April (liaising with PINS) then expect to have the EIP early Summer. Inspector's Report Autumn/Winter 2022 and adoption in Summer 2023.

Focused on LP currently and not progressing any SPD. LBW led the meeting through a series of topics, based on the GLA's comments made to the Reg.18 document and the revisions LBW had made to the plan to address these.

### 2. Strategic issues (selected based on Reg.18 comments):

The meeting progressed, based on the agenda. Strategic issues had been pre-defined for discussion which reflected the GLA's main concerns with the Reg.18 Plan, and LBW's response to this in the Reg.19 Plan. The meeting aimed to understand where the GLA had remaining concerns with the plan.



a. *Strategic Areas and Place-making approach*

The GLA had largely supportive comments on the placemaking approach and were happy with the approach taken to identify a Clapham Junction OA boundary.

b. *Housing*

LBW outlined:

- Policy SDS1, which accounts for London Plan housing targets, including the small site target;
- Policy LP23, which accommodates a 25% First Homes requirement alongside 50% low-cost rent, and 25% intermediate addressing concerns of split between low-cost rented and intermediate housing;
- Policy LP27, which seeks to protect family sized dwellings and larger amenity spaces by using a size threshold for each element. The GLA had sought amendment and clarification.

The GLA were:

- content with SDS1 being in conformity with the London Plan (including post 2028/29);
- concerned about the *requirement* for 25% First Homes, and sought further understanding about the evidence. This concern was in terms of its viability in a London context, and the potential impact on the need for social rented homes in London. It may also raise unrealistic expectation around delivery and viability. The greatest need in London is for low-cost rent; requiring 25% First Homes could jeopardise that;
- welcomed the changes made to the 15% minimum target in VNEB;
- content with the reduced threshold for conversions, and did not consider the amenity space standard in LP27 a conformity issue.

Actions / further work:

- LBW to consider the GLAs comments through the Reg.19 process alongside other reps;
- LBW anticipate the need to monitor the situation.

c. *Built & historic environment, including tall buildings*

LBW outlined:

- Policy LP3, amended to account for Westminster World Heritage Site;
- Policy LP4, which has been redrafted to incorporate a new borough-wide tall buildings definition (7 storeys or over, or 21m or over), set out mid-rise definition of 5 storeys or over or 15m or over and accord with the London Plan. Policy position that proposals will not be permitted outside each zone and that tall and mid-rise buildings are only appropriate where criteria are met in Part B;
- The published Urban Design Study.

The GLA:

- noted that there are no conformity issues with the approach of LP4 and that it was in accordance with London Plan Policy D9.

d. *Employment land and BDTQ (Battersea Design and Technology Quarter)*

LBW outlined that:

- the approach to BDTQ within the Queenstown Road SIL is retained as was set out within the Regulation 18 Local Plan, notwithstanding objections made within the GLA's representations;
- other points raised within the GLA representation relating to employment land have been addressed, including changes to the affordable workspace policy;
- the HELAA has been significantly updated, primarily to account for a design-led approach to housing capacity rather than values taken from the SHLAA. The HELAA takes the demand figure

for core industrial uses of 5.5 ha, and translates that to a floorspace need of 35,700 sqm, based on the GLA’s 0.65 plot ratio. This approach to floorspace was agreed with the GLA in the previous Duty to Cooperate meeting in May 2021;

- the LSIS (LSIA within the borough) are retained for industrial use only, and the Summerstown SIL has been promoted to a SIL. There is an expectation that these areas will provide for industrial capacity only.

The GLA:

- noted concern that the ability to meet identified need is heavily reliant on the BDTQ; however this is the same area in which co-location is permitted in the draft policy. The GLA need to be convinced that LBW can meet industrial need overall, particularly given the proximity of the Queenstown Road SIL to Central London. They will need to better understand how realistic the intensification potential, and to allay concerns that the SIL-type industrial uses are retained and protected, including B8 storage and distribution uses (in line with LBW’s identified demand). If the borough wishes to co-locate industrial uses within SIL, then it will need to be de-designated as such, and land and SIL-type uses re-provided elsewhere in the borough.
- stated that while it is fine for other employment designations to be included within the Local Plan, these should be clearly set out and not undermine the SIL / LSIS designations. Existing industrial uses must be protected and the Agent of Change principle can help in this regard.

Actions / further work:

- Consultants PRD are undertaking a re-fresh of the BDTQ concept on behalf of LBW. GLA welcome the opportunity to be involved in that work. Both parties will continue to liaise through this study and the examination process to refine the approach to the BDTQ.

*e. Waste management*

LBW stated that waste capacity (Plan identifies gap of 2.1 hectares) is identified on a number of sites and more generally across its industrial areas.

GLA raised concern about Wandsworth not meeting the London Plan apportionment target on identified steps and requested a more proactive approach in seeking further waste capacity.

Action / further work:

- LBW will work with GLA and other private individuals to reduce capacity gap;
- LBW will conduct further evidence in exhausting avenues of seeking further waste capacity.

*f. Transport and other infrastructure*

Discussion covered parking/ car-free issues and links to TfL’s comments.

*g. Town centres & retail, including night-time strategy*

LBW outlined a stronger reference to the GLA’s Town Centre Network as well as the Night-Time Classifications, in accordance with their comments.

*h. Climate change & energy, flooding & water*

LBW outlined that Air Quality focus areas included on Air Quality Action Plan are referenced in the plan’s supporting text.

*i. Natural environment*

The GLA raised some concerns regarding potential introduction of other non-safeguarded wharf uses on safeguarded wharfs.

Actions:

- GLA to recommend some minor wording changes but still recognising mixed use development potential (whilst continuing to protect the safeguarded wharf for safeguarded wharf uses).

**3. Next steps / Statement of Common Ground / Conformity letter**

LBW will prepare a Statement of Common Ground once Reg.19 comments are received, and share with the GLA.

GLA are currently consulting on a number of London Plan guides.

## Minutes of the previous meeting, 22 February 2021

### 1. Local Plan update, including SPDs

- **LBW** provided update on Regulation 18 'Pre-Publication' draft Local Plan, which is a full review. For more detailed information, please see [the Council's website](#). Points of note:
  - There is a greater emphasis on placemaking in the draft Local Plan than there has been previously, which runs as a golden thread throughout the Plan. There are nine Area Strategies, which are supported by Site Allocations, and these are informed by 'placemaking', 'smart growth', and 'people first' objectives.
  - The borough has commissioned an [Urban Design Study](#) for the first time as part of the Local Plan evidence base. This has been developed by Arup and informs the Area Strategies and a new approach to tall buildings.
  - Public consultation on the Reg 18 draft LP runs until 1 March 2021. An interactive map is [available](#). Alongside the 'formal consultation', we have been hosting events with 'seldom heard' groups, including young adults and estate residents. This has been led by a Public Practice Associate with an expertise in community engagement and makes use of online tools such as 'Miro'.
  - Most evidence was collected prior to the COVID-19 pandemic. While reference to this is made within the Plan, generally it is considered too early to adapt the approach to accommodate the impacts of this. The longer-term impact will be kept under review, including to assess whether / when evidence-based documents need updating. This is consistent with Government guidance.
  - The Local Plan has been drafted to account for the forthcoming (now adopted!) London Plan, as well as to a lesser extent the Government's White Paper (e.g. emphasis on placemaking).
  - The ambition is to get the Regulation 19 version to the September committee, and therefore to consult on this in the autumn 2021. The Plan will be submitted to PINS in spring 2022, and adoption hoped for in spring/summer 2023.
  - An area-based masterplan SPD for the Wandle Delta. The latter was published in the February 2021 committee, and is available for [public consultation](#) from 15 February to 21 March 2021. This incorporates housing and employment uses and seeks to optimise placemaking around the mouth of the River Wandle. Some of the content for the site allocations and the area strategy for Wandsworth Town in the Local Plan will be amended to fit in with the objectives of this document, which also builds off our adopted Employment and Industry Document.
- **GLA** provided an update on the Local Plan. Points of note:
  - The London Plan is to be published on 2 March 2021. The policies therefore carry full weight from this date forward.
  - The Mayor has produced nine [Recovery Missions](#), which have particular regard to the CAZ and the Opportunity Areas. LBW should take account of these.
  - Consulted recently on various guidance supporting the London Plan (finished 15 January, now in the process of consolidating responses), including on:
    - Good Quality Homes for all Londoners
    - Public London Charter
    - Circular Economy Statement
    - Whole Life-Cycle Carbon Assessments
    - Energy Planning Guidance
  - There will be consultation on further guidance in the future – stay tuned!

2. Duty to Cooperate – strategic issues:

a. Housing

- **LBW:** The Local Plan will aim to deliver at least 1,950 homes per year in line with the housing requirements set out in the London Plan. This is 70% more than the 2011 targets set out in the London Plan, however it is less than housing need as identified within the housing needs assessment. Using the standard methodology adopted in 2018, we would have a housing need figure of over 2,500 dwellings per year and using the updated methodology from 2020 would provide a figure of 3,425 dwellings per year.
- **LBW:** In accordance with the NPPF, a comprehensive review of land and sites available for development (including large, small and windfall sites) was undertaken. This identified sufficient capacity to meet and even slightly exceed the housing requirements set out in the London Plan for years 1-10 of the Local Plan period, however there is a shortfall identified over the 15-year period. The draft Local Plan has a positive approach to housing delivery on small sites, an emphasis on a design led approach to optimise housing capacity, and opportunities to create homes through estate regeneration.
- **LBW:** The HELAA utilised the sustainable residential quality density matrix to inform capacity estimates. It is recognised that this is not included in the Publication London Plan (PLP), however it forms a useful starting point. The HELAA is also informed by pre-application and application work, and through specific site assessments in the UDS, which took a design-led approach.
- **GLA:** Supportive of the work that LBW have undertaken to inform capacity – which helps to inform the site allocations rather than simply amend targets. It is noted that should LBW wish to consider targets beyond 28/29, they should refer to para 4.1.11 of the PLP, rather than assuming that targets will be rolled forward (see part A of LP24). The borough should have confidence in using the housing targets identified in the London Plan, which is recognised within the Plan and through a Direction issued by the Secretary of State (SoS).
- **GLA:** The borough should incorporate the small sites target within the body of the policy to give it additional weight.
- **LBW:** The Local Housing Need Assessment (LHNA), undertaken by GL Hearn, identifies a net need for 2,327 affordable rented and 1,248 affordable home ownership dwellings per annum to be provided over the plan period. The level of need is significant, and for that reason the proposed affordable housing policy (LP25) sets the aspiration to secure 50% of all new homes to be affordable, generally in line with the intent of the London Plan. The requirement for the percentage of affordable units that must be delivered on-site is lower in the VNEBOA (15% rather than 35%) to account for investment in infrastructure that has occurred within the area. This will be informed further by the outcomes of a Whole Local Plan Viability Assessment. The policy also changes the tenure split that is required for affordable housing, from 60% (social rent) to 40% (intermediate products) to a 50:50 split.
- **GLA:** The policy should clarify how it is to apply the Mayor’s threshold approach to viability testing, as this is not clear from the policy. It is sufficient to refer to the ‘Mayor’s Threshold’ approach, rather than stating that proposals will be subject to viability, which may cause confusion. The GLA are satisfied with the approach to the tenure split, which is consistent with the limits set within the London Plan.
- **GLA:** With respect to the 15% on-site approach to affordable housing within the VNEBOA, it is noted that this is based on outdated evidence (DIFS in 2010, and the VNEBOA study adopted in 2012). This figure therefore looks low and should be reviewed. Updated evidence in the DIFS should account for:
  - The extent to which the Northern Line extension and other VNEBOA infrastructure requirements have been funded and completed.

- The rise in residential values in the borough and the VNEB OA since 2013.
- The borough’s intentions regarding CIL Charging Rates, which are due to be reviewed this year.
- **LBW:** Currently updating the Nine Elms Funding Study, and if this identifies a different approach to affordable housing this will be taken forward within the Local Plan.
- **LBW:** The draft Local Plan sets out a policy to resist large-scale shared living scheme (e.g. co-living) (LP 31), subject to criteria, including that the site must be demonstrated as not being suitable to accommodate conventional units. This position is evidenced-base to help combat Wandsworth’s transient population. The **GLA** suggested that the wording could be softened to better align with the PLP (i.e. to remove the wording “generally resisted”). **LBW** enquired to whether a similarly resistive approach to Build to Rent would be considered by the **GLA**. TfL are favourable to this format on their own land, and it is therefore promoted within the PLP. More resistive approaches are unlikely to be supported without local evidence. **LBW** could take a positive approach to specifying where Built to Rent would be appropriate, as set through site allocations. This would direct this type of development to appropriate locations.
- **LBW:** Policy LP 7 (Small Sites) is aligned to the UDS, and therefore the London Plan approach. The intention for the Reg 19 version is to take a slightly more nuanced as it seeks to limit this to areas with low sensitivity to growth (e.g. a fragmented character rather than conservation areas) as well as good public transit accessibility. **LBW** seeks to produce an SPD on this topic in the future. The **GLA** identified work by LB Merton and LB Croydon as useful precedents, as well as the Good Quality Homes for all Londoners SPG.
- **LBW:** The Council has a long-established Gypsy and Traveller site in Earlsfield, which currently accommodates 11 residential pitches, one of which is vacant. The Gypsy and Traveller Accommodation Needs Assessment (2019), which was conducted in-house, found that there is no evidenced requirement or need for additional pitches to be provided on the existing site or elsewhere in the borough. If demand exceeds supply in the future, the Council will explore options to identify an additional site.
- **GLA:** The Mayor will be initiating and leading a London-wide Gypsy and Traveller accommodation needs assessment. Funding will be made available through the Homes for Londoners Affordable Homes Programme for the provision of new pitches or refurbishment of existing pitches.

*b. Built & historic environment, including tall buildings*

- **LBW:** Commissioned the [Urban Design Study \(UDS\)](#) to develop a better understanding of the values, character and sensitivity of different parts of the borough. The study identified 7 high level places and 21-character areas in the borough. This guidance has been embedded in the area strategies for different parts of the borough. The UDS recommended revising the currently adopted tall buildings policy. The draft policy identifies a number of local definitions of “tall” (informed by the local prevailing height) and identifies broad locations across the borough where tall buildings may be appropriate. There are three types of tall building zones: opportunity for tall building clusters, opportunities for tall buildings in town centres, opportunity for tall buildings within a local context. Maximum heights are not set, and heights set out within Table 23.1 therefore relate to local definitions of what constitutes a tall building (effectively the threshold for when the policy applies). The Secretary of State’s Direction to the Mayor requiring that the minimum definition of tall buildings should not be less than 6 storeys or 18 metres impacts on recommended local definitions of tall within the UDS, based on prevailing heights (i.e. up to 5 storeys).
- **GLA:** The approach to defining ‘tall buildings’ for specific localities and the associated mapping is welcomed. The SoS Direction will require the approach set out in the draft Plan to be revised, as this is now a potential issue of non-conformity. With respect to locations for tall buildings,

there are concerns that Part D.2. of Policy LP4 could provide a loophole for proposals to come forward for tall buildings in any locations in the borough.

- **GLA:** Would prefer to see LBW setting out maximum heights within the policy in order to create certainty for the LPA and developers, as set out within line Policy D9 Part B.2.
- **LBW:** The policy on the historic environment seeks to preserve the significance of the historic environment and is considered unlikely to cause any cross-boundary issues.
- **GLA:** Recommended that LBW include reference to the Westminster WHS within the Tall Buildings policy (LP4) and potentially as a distinct heritage policy. LBW noted that Historic England had accepted the Local Plan as it is currently set out with respect to this issue. The Plan also seeks to avoid cross-referencing policies, however an inclusion within the supporting text could be made. Historic England are close to publishing their revised Advice Note on Tall Buildings, and therefore references to this will need to be made within the Local Plan.

*c. Employment land*

- **GLA:** The Local Plan is founded on positive work in establishing the level of demand that is anticipated over the Plan period, as set out within the updated [Employment Land and Premises Study \(2020\)](#). This document suggests there is demand for office floorspace (22,500 sqm) and industrial land (8.6ha) in excess of supply.
- **GLA:** There is a potential issue of non-conformity with the principle of co-location within the Battersea, Queenstown Road SIL (as the Battersea Design & Technology Quarter), which is not supported by the London Plan (Policy E7.B). There is recognition that the intention of this designation is to realise industrial intensification within this location, however, should this option continue to be pursued, then it would need to be done through a process of SIL consolidation and release. Replacement SIL would therefore need to be identified. Further, the principle of vertical co-location, as advocated within the BDTQ, is less preferable than horizontal co-location of different uses. In the latter form of development, it is generally easier to mitigate potential issues between uses (industrial and other).
- **LBW:** The proposal to encourage co-location within the Battersea Design & Technology Quarter / part of the Queenstown Road, Battersea SIL is predicated on investment that is occurring to the north of this site (development and transportation facilities). As such, it is considered to be a more attractive and suitable location for this form of development, rather than permitting co-location in the majority of our LSIA's. The Summerstown LSIA is being proposed as SIL within the draft Local Plan, in line with the PLP. This has previously been identified as a LSIA, and therefore its designation would represent an uplift of the amount of SIL land within the borough in the draft Plan compared with the adopted Local Plan. Interested whether this would constitute substitution in line with the London Plan requirements. This should be considered in greater detail with Giorgio Wetzl (GLA).
- **GLA:** It would be helpful for the LBW to consider, in collaboration with the Mayor (GW and HA), whether certain logistics, industrial and related functions in selected parts of SIL or LSIA's could be intensified to provide additional industrial capacity. This should form an additional piece of evidence base work to support the Local Plan. The draft Plan policies and Site Allocations provide indications of where additional industrial capacity is expected to come forward or could be potentially delivered via industrial intensification over the Plan's period. The draft Plan Policy LP37 and supporting text provide a clear framework setting out the role that strategic reservoir of industrial land (SILs and LSIA's) and industrial land and premises in other locations (including EUIAs, EUPAs, Focal Points of Activities, etc) could have in meeting identified demand for industrial and related uses. However, with the exception of proposals for the BDTQ and some Site Allocations, the draft Plan includes few details on the amount of additional industrial floorspace (and ha-equivalent) that could be delivered in specific locations over the Plan period.

It would be helpful to clearly present in the Plan how the identified industrial demand could be met across Wandsworth’s industrial and other locations. This could be set out in a schedule providing details on expected and potential gains and losses of industrial capacity (both in terms of floorspace and land-equivalent) across specific locations and sites, highlighting how these cumulatively would ensure that identified industrial and related demand to 2034 is adequately met. These additional details would provide further certainty and ensure that the draft Plan’s strategy would be effective in meeting identified demand for industrial and related functions, as well as providing clarity for development management purposes.

*d. Waste management*

- **GLA:** It is positive to see the apportionment of waste set out within the PLP recognised within the Local Plan, as well as safeguarded waste sites identified. The Plan also identifies that 95% of construction and demolition waste should be reused, recycled or recovered.
- **GLA:** There is concern over the identified immediate capacity gap, equivalent of 2.1ha in 2021 (Wandsworth’s Waste Technical Study), which is contrary to the Mayor’s ambition that the equivalent of 100% of waste should be managed within London (net self-sufficient) by 2026. This is a potential non-conformity issue. The risk that this will not be met is exacerbated as Wandsworth is part of the Western Riverside Waste Authority, and so there is reduced control over the location of where waste is being disposed. It is the GLA’s preference that LBW form part of a joint Waste Plan, in line with para 9.8.7 of the PLP. The example of Westminster was provided, who joined the South East Waste Plan, as there was capacity in Bexley to accommodate Westminster’s unmet waste need (new facility proposed by Cory). If this option is not possible, it is advised that LBW look at sites within the borough where the waste needs could be met (e.g. through site allocations).
- **LBW:** The intention is to accommodate any surplus within the Council’s designated industrial locations (SILs and LSIAAs). LBW had sought previously to pool apportionments with neighbouring boroughs (Hammersmith & Fulham, Lambeth, K&C), however this attempt was unsuccessful. Duty to Cooperate on waste is being separately led by the Council’s waste planning consultant, Victoria Manning of Vitaka Consulting, who has been in contact with other boroughs. **GLA** noted that Victoria worked with WCC. **LBW** consider this with Victoria.

*e. Transport and other infrastructure (including impact on Opportunity Areas)*

- **LBW:** The Draft Plan advocates support for the main ongoing infrastructure projects in the borough, including Crossrail 2. For CR2, the Plan recognises that the project may not come forward, and therefore incorporates a ‘fallback’ option that major development sites – particularly in Clapham Junction – would still be suitable for redevelopment even without this infrastructure, albeit on a likely reduced scale.
- **GLA:** The Opportunity Area is identified within the PLP and therefore boroughs should take confidence from this position. It would be helpful for LBW to define the boundary of the OA. References to the OA should also not include the wording ‘nascent’. LBW has resisted defining the boundary thus far as the scale of development has been unknown with regards to CR2. Language surrounding nascent is taken from the London Plan (see Figure 2.2 and paragraph 2.1.5).

*f. Town centres & retail*

- **LBW:** Queried the process for defining the boundaries of the potential CAZ retail clusters in Nine Elms (especially Battersea Power Station). This query should be raised with Hassan Ahmed, who can refer to Gerrard Burgess.



### 3. Statement of Common Ground

- **LBW:** Will formalise discussions as part of a SOCG, with the intention to do so for submission. GLA encouraged that we retain an active dialogue throughout the Reg 19 and submission process and are therefore happy to keep a draft version during this timeframe which is only finalised at the end of the process.

For more information write to:  
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