

Employment and Industry Document - Submission Duty to Co-operate
Statement October 2017

Employment and Industry Document - Duty to Co-operate Statement

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1 Introduction and Background

The Duty to Cooperate

1.1 This statement sets out how Wandsworth Council has co-operated with other local planning authorities and partner organisations on strategic transboundary issues during the preparation of the Local Plan Employment and Industry Document (LPEID). This is a partial review of the Council's Local Plan, which was adopted in 2016, and is therefore correspondingly limited in scope. This Duty to Co-operate report accompanies the Submission version of the Wandsworth Local Plan Employment and Industry Document which incorporates changes made at all stages and which is being submitted to the Secretary of State for Examination.

1.2 The Localism Act 2011 places a Duty to Co-operate on local planning authorities to maximise the effectiveness of plan making. This requires them to engage constructively, actively and on an on-going basis in the preparation of development plan documents where this involves strategic matters. During "...independent examination of development plan documents local authorities will have to provide evidence that they have complied with the duty [to co-operate] if their plans are not to be rejected by the examiner". A Statement of Consultation has been produced for each the stages undertaken so far, which sets out how the Council has consulted relevant bodies during the act of plan-making. However, this report has also been provided in order to demonstrate how the Council has fulfilled its Duty to Co-operate obligations, as set out under Section 110 of the Localism Act 2011 (and explanatory notes), Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended) and Part 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

1.3 National planning policy in the NPPF adds to this statutory duty as it requires local planning authorities to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts. Analysis of the effectiveness of the co-operation that has taken place is also made within this statement in accordance with the requirements of paragraph 182 of the NPPF. In addition, the National Planning Policy for Waste (October 2014) requires that waste planning authorities "work collaboratively in groups with other waste planning authorities...through the statutory duty to co-operate, to provide a suitable network of facilities to deliver sustainable waste management". In London strategic planning is carried out by the Mayor for London and policies are set out in the London Plan, which forms part of the development plan for London boroughs and includes borough-level housing targets, waste apportionment, and identifies strategically protected industrial land and the Central Activities Zone (CAZ). This is acknowledged in the Duty to Cooperate engagement documented in this report, and meetings have taken place including with planning officers from the Greater London Authority (GLA).

1.4 The EU Habitats and Wild Birds Directives aim to protect and improve Europe's most important habitats and species. This Directive is translated into UK legislation as the Habitats Regulations 2010, and which require an assessment of any plans which are likely to have a significant effect on any 'European sites'/'European protected species'. Natural England, as the statutory nature conservation body in England, must be consulted by the competent

authority (the Council) to provide expert advice, for example on possible effects of a local plan on these sites/species and on evidence to inform the relevant decisions. The Council has undertaken specific collaboration with Natural England in this respect, as well as undertake separate consultation on preparing the Scoping report, which the first stage of the sustainability appraisal process.

1.5 The Duty to Co-operate also incorporates a number of public bodies in addition to other local planning authorities. These bodies set out in Part 2 of the Town & Country Planning (Local Planning) (England) Regulations 2012:

- Environment Agency
- Historic England
- Natural England
- Mayor of London (GLA)
- Civil Aviation Authority (CAA)
- Homes and Communities Agency
- Primary Care Trusts
- Office of Rail Regulation
- Transport for London (TfL)
- Integrated Transport Authorities
- Highways Agency
- Marine Management Organisation
- Local Enterprise Partnerships

1.6 These public bodies are required to co-operate with local planning authorities on issues of common concern to develop sound local plans. In London, Transport for London (TfL) is the strategic transport authority and is part of the Mayor's responsibilities. The Mayor also has strategic housing functions.

The Wandsworth Local Plan

1.7 Whilst the Wandsworth Local Plan Documents were adopted in March 2016, the Council had committed to producing a new Local Plan document covering employment premises and industrial land as the evidence base supporting the recently -adopted policy was becoming out of date (the DTZ Employment Land and Premises Study 2010). The National Planning Policy Framework (NPPF 2012) outlines the principles that Local Planning Authorities should follow in preparing their evidence base to inform employment land policies. The need for Local Planning Authorities to produce an up-to-date employment land evidence base and the suggested format is outlined in national Planning Practice Guidance which updates the suggested methodology for producing an employment land evidence base. The Council commissioned a borough-wide Employment Land and Premises Study (ELPS) which was published in August 2016. The ELPS assesses the quantity, quality and viability of the Borough's employment land to form an evidence base to support the review of Wandsworth's Local Plan. This also reviewed other London borough's evidence and local plan policies, and

strategic-level evidence notably the Greater London Authority's (GLA) Land for Industry and Transport Supplementary Planning Guidance (SPG) (2012) which also provides specific directions on employment provision requirements in London.

2 The Wandsworth Context

2.1 Wandsworth is an inner London borough, sharing some characteristics with the other inner London boroughs whilst retaining its own character. It is part of a much wider city region, Greater London, which has its own regional plan - the London Plan (2016). This sets out the strategic framework for the whole of London, and Wandsworth's Local Plan must be in general conformity with it. Wandsworth has a functional geographic relationship with London and in particular with south west London boroughs. Wandsworth borders seven local planning authorities: Lambeth to the east, Merton, and the Royal Borough of Kingston upon Thames to the south, Richmond Upon Thames to the south and east, and across the river to the north, the riparian boroughs of Hammersmith and Fulham, the Royal Borough of Kensington and Chelsea, and Westminster City Council. Account must also be taken of the policies and plans of these boroughs. The highly built up nature of the borough also means that there can also be local and potentially significant impacts (such as traffic flows and significant infrastructure projects), that must also be taken into account. The Employment Land and Premises Study (ELPS) undertaken to inform this partial review, identified the Functional Economic Market Area (FEMA) comprising surrounding boroughs and the central London office market in the CAZ (Central Activities Zone).

2.2 In line with other London boroughs, planning policies and planning decisions must take account of, and support, the London Plan. The London Plan identifies the Vauxhall Nine Elms and Battersea Opportunity Area (VNEB OA), which includes parts of the London boroughs of Lambeth and Wandsworth as an area for comprehensive regeneration and is central London's biggest regeneration area. This former industrial area, now referred to as Nine Elms Vauxhall, and will become a new neighbourhood with significant levels of housing, business floorspace and retail, and a potential new town centre (CAZ frontage) around Battersea Power Station. The London Plan provides strategic context and policy direction for this review - Policy 4.1 is an overarching policy promoting economic growth and vitality. More specifically the London Plan also sets out strategic policies for the CAZ, and for Strategic Industrial Locations (SILs - Policy 2.17). Specific to this Local Plan Review, the London Plan seeks to protect industrial land from changing to other uses and has identified Wandsworth as a 'restricted transfer borough (with exceptional planned release) to other uses'.

WASTE

2.3 Waste is a strategic planning issue with cross-boundary implications and is therefore subject to the Duty to Cooperate. In addition to being the planning authority, the Council is also the Waste Planning Authority (WPA). Waste planning is carried out in Wandsworth through the Western Riverside Waste Authority (WRWA) which includes the London boroughs of Lambeth, Kensington and Chelsea, Hammersmith and Fulham and Wandsworth Council. To deliver national and London Plan requirements for waste, the Waste Planning Authority must demonstrate collaborative working in collating evidence, exchanging information, and in developing appropriate strategies to manage waste. The Council supports the Municipal Waste Management Strategy, which has been developed in partnership with the WRWA and

its constituent boroughs, and is implemented in Wandsworth by the Core Strategy, Site Specific Allocations Document (SSAD) and Development Management Policies Document (DMPD).

2.4 Waste management and safeguarded wharves policies is not subject to review in the LPEID: this will be carried out as part of the full Local Plan review. However, on-going engagement takes place within the WRWA boroughs, to inform the local plans of each authority, which are at different stages of production. To inform the full review of the Local Plan, a joint Waste Technical Paper is being prepared. This will inform the full review of the Wandsworth Local Plan. The existing waste and safeguarded wharves policies in the Industry, Employment and Waste chapter of the adopted Development Management Policies Document (DMPD) have been included unchanged in the LPEID. By transferring these policies across to the new document, chapter 5 from the Employment and Industry chapter of the DMPD can be removed in its entirety to best achieve consistency and clarity in this partial review of the Local Plan.

3 Cross-borough Strategic Issues and Engagement

3.1 The main strategic matters between Wandsworth, the adjoining boroughs and the rest of London are:

- Nine Elms – the Wandsworth part of the Nine Elms Vauxhall Opportunity Area
- Strategic Industrial Land
- Safeguarded employment land including offices
- The housing market (including student housing and gypsy and traveller provision)
- The town centre network and retail growth
- Infrastructure provision/the Thames Tideway Tunnel
- River Thames
- Strategic site specific allocations
- Waste and safeguarded wharves

3.2 These inter-relationships are still largely relevant to plan-making in respect of the Employment and Industry Document, however the housing market (including student housing and gypsy and traveller provision) the town centre network, river Thames and waste and safeguarded wharves are not included in this Partial Review.

Engagement on a regional level

3.3 The Greater London Authority Act (GLA) requires the Mayor for London to produce a Spatial Development Strategy, known as the London Plan, and to keep it under review. The London Plan must take account of the relevant European Union legislation and policy instruments (for example the European Spatial Development Perspective) and takes forward national policy in the NPPF. It provides the strategic context and direction for individual boroughs' Local Plans which have to be in 'general conformity' with London Plan policies, and is also part of each London boroughs development plan. Development decisions at borough-level must demonstrate that London Plan policies have been taken into account or must justify any alternative approach.

3.4 The London Plan comprises the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20–25 years and brings together the geographic and locational (although not site specific) aspects of the Mayor's other strategies – including those relevant to this Employment and Industry Document:

- A range of environmental issues such as climate change (adaptation and mitigation), air quality, noise and waste
- The framework for the development and use of land in London, linking in improvements to infrastructure (especially transport); and helping to ensure joined-up policy delivery by the GLA Group of organisations (including Transport for London)
- The strategic, London-wide policy context within which boroughs should set their detailed local planning policies

- The policy framework for the Mayor's own decisions on the strategic planning applications referred to him
- An essential part of achieving sustainable development, a healthy economy and a more inclusive society in London

3.5 Under the legislation setting up the GLA, the London Plan should only deal with things of strategic importance to Greater London. The legislation also requires that the London Plan should take account of three cross-cutting themes - and specific to this Employment and Industry Document being economic development and wealth creation.

3.6 As part of preparing and developing the Employment and Industry review, the Employment and Industry Document is underpinned by the London Plan evidence base prepared by the GLA group and other relevant authorities. All stages of the Plan's development have been prepared in accordance with national and regional policies, particularly the London Plan (2016). The Council has engaged with the GLA at all stages in particular regarding the evidence base and strategic overview and direction relating to employment growth scenarios and other economic development matters. Particularly relevant to the development of the Plan was engagement on the strategic evidence base such as GLA growth forecasts, the London office market and Central Activities Zone (CAZ), and strategic industrial land. On-going engagement has also taken place with the GLA on waste allocations, protected waste sites and safeguarded wharves. The Council's approach to reviewing these policy matters as part of a full review of the Local Plan is supported by the GLA and will be guided by an updated London Plan.

3.7 The Council is a member of Central London Forward, a sub-regional partnership of central London boroughs. This facilitates discussion between the boroughs, TfL, the GLA and other Central London stakeholders on a range of planning, transportation and regeneration/economic development issues. In addition the Council, while not being a full member of the South London Partnership, does attend its Growth Board, and Transport Strategy Board. This enables discussion of sub-regional matters to take place on a regular basis, in particular the growth agenda, and for joint submissions to be made on sub-regional issues when appropriate.

3.8 The London Enterprise Panel is the local enterprise partnership for London. Chaired by Mayor for London, the LEP is the body through which the Mayorality works with London's boroughs, business and Transport for London to take a strategic view of the regeneration, employment and skills agenda for London. The LEP makes recommendations to the Mayor with regard to funding and policy decisions. The Nine Elms Vauxhall Partnership has been engaging with the London Enterprise Panel (LEP) through the Employment and Skills subgroup on employment skills and training matters. Whilst Planning Practice Guidance (PPG,) states that '*Local Enterprise Partnerships and Local Nature Partnerships are not subject to the requirements of the duty. But local planning authorities and the public bodies that are subject to the duty must cooperate with Local Enterprise Partnerships and Local Nature Partnerships ...*'

3.9 For London, the London Enterprise Panel (LEP) is the Local Enterprise Partnership. The Board Coordinator of the LEP has confirmed that it does not need to be consulted as part of the preparation of the Local Plan review and have referred Council officers to the strategies, plans and projects of the LEP. However, in respect of good plan-making, a Duty to Co-operate review of LEP Strategies, Plans and Projects was undertaken as a desk-based exercise on the following strategies & plans:

Growth Deal for London
2014-20 European Structural & Investment Funds (ESIF) Strategy for London
Jobs & Growth Plan
London 2036: An agenda for jobs and growth

3.10 A large proportion of Wandsworth's protected industry and employment land is located in areas of significant flood risk. In addition, any growth agenda will have implications for water and sewer capacity. Regular engagement takes place with both the Environment Agency and with Thames Water on planning policy issues and on planning applications in relation to water and sewer capacity, and flood risk which are also strategic issues. In their capacity as a Lead Local Flood Authority (LLFA) Wandsworth Council is a member of LoDEG (London Drainage Engineers Group) along with the other London borough officers which discusses flood risk, SUDs and related drainage issues. LoDEG's remit aims to facilitate partnership working between London Boroughs and other risk management authorities (including the Environment Agency, GLA and Thames Water); formulate and provide advice; and to promote best practice, and share knowledge and experience within the profession.

Engagement on a sub-regional level

3.11 As detailed in the previous section, there is on-going Duty to Cooperate engagement with adjoining boroughs which are part of the housing market area or Functional Economic Market Area FEMA. Each of these boroughs, in developing its own local plan has carried out on-going Duty to Cooperate engagement. In developing the Employment and Industry Document, regular correspondence and/or meetings have taken place with adjoining boroughs under the Duty to Cooperate at all stages including the informal policy options stage, and these have been summarised in Appendix 1 and set out in more detail in the relevant Statements of Consultation. Strategic transport, waste and wharves, industrial and employment land, Wandle Valley and the Thames riverside are specific strategic matters relevant to this review that are common policy areas with adjoining boroughs.

WASTE

3.12 Waste planning and policy is a standing item on Duty to Co-operate meetings with the four WPA boroughs, who are at different stages in plan-making. Whilst waste and working wharves policies remain unchanged in the LPEID, on-going Duty to Cooperate meetings with these boroughs will help inform any changes to waste policies and safeguarded wharves as part of the full review of the Local Plan. Full details of the responses on waste matters and working wharves are described in the Statements of Consultation.

NATURAL ENGLAND AND HABITATS REGULATIONS ASSESSMENT

3.13 The Council has consulted Natural England at all stages of the Employment and Industry Local Plan review, Natural England commented that the scope of the proposed Plan was outside of its remit. In addition to the local plan Regulation 18, Informal Options and Regulation 19 consultation process, the Council has specifically engaged Natural England on the content of the Scoping Report (the first stage of the Proposed Submission Integrated Impact Assessment report - IIA), and on the screening exercise undertaken in respect of appropriate assessment under the Habitats Regulations.

3.14 The Council's consultants preparing the Scoping report, which inform the baseline and sustainability objectives of the IIA, consulted Natural England on the draft Scoping report between August and September 2016. Natural England responded by providing comments on the content of the baseline and potential sources of information, and confirmed agreement with the 'European sites' proposed in the draft Scoping report for consideration for Habitats Regulations Assessment (HRA) screening. Natural England is the statutory nature conservation body in England and must be consulted by the competent authority (the Council) to provide expert advice, for example on possible effects on the 'European sites' and on evidence to inform the relevant decisions. The Council has undertaken specific collaboration with Natural England in this respect. The Council contacted Natural England in January 2017 on the need for a habitats assessment, and to ensure soundness and compliance with the Habitats Regulations, wrote to Natural England in April 2017 seeking a formal opinion on the Council's screening exercise. The Council provided background information including the 2015 Habitats Regulations Assessment report and Scoping report, and specifically requested whether Natural England agreed with Council's opinion that the 2015 Habitats Regulations Assessment (HRA) Report remains adequate, or whether a further HRA should be undertaken on the emerging Wandsworth Employment and Industry Local Plan. Natural England responded in June 2017 confirming that 'the short Habitats Regulations screening document supplied in support of this review provides an acceptable level of assessment in line with the fact that the local plan has been adopted recently and has its own full HRA in support of its allocations.'

4 Overview of the Employment and Industry Review

4.1 The production of the new Employment & Industry Local Plan document has gone through a number of stages of engagement as reported in more detail in the Statements of Consultation. The first part of stage 1 (Preparation) was the Regulation 18 - preparation stage consultation, which was then followed by an informal Policy Options consultation. This took place after the production of the Employment Land and Premises Study and 'call for sites' consultation request. Stage 2 (publication) comprised the published Submission document and Regulation 19 consultation. The consultation material emphasised that this is a partial review limited to reviewing the approach to employment and industrial land and premises, and that a full review of the Wandsworth Local Plan documents would follow.

Work Programme

Stage	Exercise	Timeframe
Stage 1: Preparation	Regulation 18 preparation stage consultation	Dec 2015- Jan 2016
	Employment Land and Premises Study	Apr-Jul 2016
	Call for sites	June-Sep 2016
	Policy Options consultation	Oct 2016
Stage 2 : Publication	Publish submission version	Mar 2017
	Regulation 19 submission version consultation	Mar-Apr 2017
Stage 3: Examination	Submission to Secretary of State	Oct 2017
	Examination	
Stage 4: Adoption	Adoption	

4.2 In addition to the standard consultation which is reported in the Statement of Consultation for each stage, specific formal Duty to Cooperate letters and emails were separately sent out inviting the Duty to Cooperate consultation bodies to meet to discuss the consultation. At Regulation 18 stage engagement focussed on the scope of the review, the evidence base and strategic/cross-boundary issues. A series of email correspondence and/or meetings were set up to provide feedback and identify any strategic issues. At all stages, meeting agendas were mutually agreed in advance, and minutes were drafted by Council officers and circulated for agreement to provide an accurate record of Duty to Cooperate engagement. Separate engagement took place with the GLA, specifically to test growth forecasts, discuss the scope of the Employment Land and Premises Study and the partial review in general, and to share relevant evidence.

4.3 Following the completion of the Employment Land and Premises Study and the 'call for sites', policy options were drafted which took account of the consultation responses including any feedback resulting from the Duty to Cooperate bodies, and other evidence. This was a non-statutory stage and took the form of set questions on a range of policy options. These were then consulted on as part of an informal Policy Options stage consultation which included the Duty to Cooperate bodies as part of a wider informal consultation stage.

4.4 Policies and site allocations were then refined into a Submission version DPD (Stage 2 - Regulation 19) and letters inviting the Duty to Cooperate bodies to meet again were sent out. Reflecting the late stage of the process, bespoke letters/email to the Duty to Cooperate consultees were drafted to highlight as far as possible the key issues and possible topics of discussion such as land holdings, infrastructure plans affecting Wandsworth, relevant to that particular organisation.

4.5 The GLA were engaged at each of the above stages, concentrating on the local and London-wide evidence base and growth scenarios. A Duty to Cooperate meeting was held on September 2016 and other on-going engagement has taken place in writing, leading to responses to each consultation by letter dated 28 January 2016 and 11 November 2016. The outcome of GLA engagement are separately reported in detail the respective Statements of Consultation. The Mayor has stated that the plan is in 'general conformity' with the London Plan as part of the Regulation 19 consultation response.

5 Duty to Co-operate Engagement on the Employment and Industry Document

5.1 The 'front loading' of the local plan system means that the earliest stages of local plan-making consultation should be the most important stage in securing a sound plan that is well-evidenced. Wandsworth's early Duty to Cooperate engagement sought to agree the remit of the Employment and Industrial Land Study and the scope of the evidence base required, taking into account similar evidence and knowledge base from the Duty to Cooperate bodies and shared experience with adjoining boroughs' local plan reviews.

5.2 Initially, a framework to guide early Duty to Cooperate discussions was prepared for consistency:

- a. Identify the cross-boundary strategic priorities
- b. Identify the supply of industrial land and offices for the economic market(s) that includes Wandsworth (both local and larger than local);
- c. Identify economically-active land with a strategic function for London, including:

- New Covent Garden Market
- American Embassy (pending and associated premises)
- Protected wharves
- Waste processing sites
- Transport storage sites (eg bus depots)
- Industrial sites that support the Central Activities Zone (CAZ)
- Contribution to London-wide industrial land (emerging Local Plan evidence)
- Land that supports London's creative and cultural sectors
- Infrastructure Issues
- Waste
- Needs of other boroughs or utilities for land released from industrial use
- Local cross-boundary Issues

Regulation 18: Stage 1 Preparation stage consultation

5.3 The Regulation 18 consultation broadly set out:

- The reasons for the review
- How the review will be carried out and the timetable for this work
- The existing Local Plan policies that are intended to be replaced
- The proposed areas for review

5.4 The key aims of Duty to Cooperate collaboration at this stage were to:

- Identify cross-boundary strategic issues
- Identify infrastructure issues
- Identify the needs of other organisations/bodies regarding potential land release from industrial use

5.5 During the examination hearings on the now-adopted Local Plan documents, the Council made a commitment to updating the evidence which supports the policies and site allocations for employment and industrial land and premises, and to use this updated evidence to carry out a partial review of these aspects of the Local Plan documents. Duty to Cooperate collaboration comprised targeted emails and letters with an invitation to meet Council officers to discuss the forthcoming employment and industrial land review. General regulation 18 correspondence was carried out in December 2015/January 2016 which includes a separate consultation with the Duty to Cooperate bodies, and Duty to Cooperate meetings were also held within this timeframe. Specific consultation under the Duty to Cooperate took place on the scope of the review, to share employment-based evidence, and to discuss current and potential site allocations and areas for protection. Meetings held at this stage were therefore focussed on communicating the reasons for, and remit of the partial review and to discuss this and the suggested approach to the review.

5.6 The London boroughs of Lambeth, Kensington & Chelsea, Merton, Hammersmith and Fulham and Richmond-upon-Thames (Richmond) either attended meetings or provided written feedback under the Duty to Cooperate, along with Historic England and the GLA. Meetings took place between November 2015 and January 2016. A summary of responses, discussion points and agreed actions is set out in Appendix 1 and general responses received from the Duty to Cooperate partners are set out in more detail in the Statement of Consultation. Office supply throughout London as well as within the FEMA was explored at the Duty to Cooperate meetings. These also included discussions and information exchange of borough-level and GLA evidence reports relating to employment and waste. Richmond identified that both councils share common concerns regarding the loss of employment floorspace and industrial land, and expressed support for the approach taken and identified the benefit of adjoining boroughs taking a consistent approach. Waste apportionment, waste sites and safeguarded wharves which are generally on-going discussions with the constituent Waste Planning Authority boroughs, and neighbourhood planning, Article 4 directions and the London Plan updates/GLA matters were standing items at the Duty to Cooperate meetings. Kensington and Chelsea made representations on waste and safeguarded wharves and the importance of continuing collaboration. The Duty to Cooperate meeting with Lambeth confirmed that they were progressing an office to residential Article 4 direction in advance of Wandsworth, and committed to liaising to ensure consistency with boundaries. Collaborative work and shared experience on these areas has assisted the this partial review as well as other borough's local plan reviews. Meetings with adjoining boroughs also provided an opportunity to discuss major planning applications which may have cross-boundary implications, for example the meeting with Richmond highlighted large development sites close to the borough boundary (the former Stag Brewery and Barnes Hospital). Discussions with Hammersmith and Fulham confirmed that both boroughs are in the same FEMA and the importance of ensuring similar policy approaches are taken so that demand from providing new employment sites or protecting existing ones does not disproportionately impact one borough over another. Historic England were the only Duty to Cooperate body that met with officers specifically under the Duty to Cooperate and re-iterated the importance of researching the industrial heritage and employment legacy in the subsequent written response. Other

Duty to Cooperate prescribed bodies providing a written response include the Environment Agency, National Grid, Natural England, Port of London Authority (PLA), Thames Water and these are detailed in the Statement of Consultation.

5.7 Outcomes: No outstanding cross-boundary issues were raised. The meetings did however provide a useful forum for cooperation such as sharing information and evidence to inform the next stage of the review, experience and approaches to seeking an Article 4 directions. Strategic direction for subsequent stages was provide through collaboration with the GLA, who were generally supportive, and suggested consideration of mixed use where surplus industrial land can be justified taking account of both local and strategic needs. Wider discussions on employment-based evidence and studies took place, and once drafted, Wandsworth's Employment and Industrial Land study were main topics of discussion with GLA at the two meetings held at this stage. The meetings enabled strategic-level input on the emerging evidence base which informed the next stage of the review. Hammersmith and Fulham, Kensington and Chelsea and Richmond were all further advanced in plan preparation and were able to share experience with Wandsworth at the Duty to Cooperate meetings. Having local plan preparation as a standing item in meeting agendas is an important theme for Duty to Cooperate collaboration. Duty to Cooperate engagement at this stage was particularly beneficial for scoping and confirming the remit of the review, potentially saving time and resources through shared information exchange, discussion on strategic employment land, and the exchange of experience of alternative policy approaches to Employment and Industry policy matters taken forward by other boroughs. The Duty to Cooperate meetings were beneficial in scoping Wandsworth's approach to protecting offices from permitted rights by offering the shared experience of most boroughs on prior notifications, permitted development rights and potential Article 4 directions to control offices to residential use. Overall, the strategic direction provided by the GLA, and the general support for the approach of the review helped shape the policy options which were consulted on in the next (informal) stage of the review and helped shape the specific consultation questions for the next round of consultation, to provide focus to the consultation.

Policy options consultation

5.8 This was an additional stage of engagement by the Council which is not prescribed in the Local Planning Regulations 2012. It aimed to complement the earlier Regulation 18 stage and to explore the issues in further detail, including taking into account the evidence base and responses made at Regulation 18. Policy options consultation took place between 7 October and 4 November 2016. This second consultation set out a broad set of policy options with a document containing 67 specific questions about the suggested policies and/or policy direction.

5.9 Taking account of the scope and key aims set out above, consideration of the Local Nature Partnership (LNP) and Wandle Valley Regional Park Trust (WVRPT) were identified in addition to the specific Duty to Cooperate bodies as having a remit related to the scope of the review. A summary of responses, discussion points and agreed actions specific to Duty to Cooperate engagement is set out in Appendix 1. Responses are set out in full in the Consultation Report for this stage which also includes an analysis of the responses and how

the issues raised have been taken forward in the preparation of the Employment & Industry Local Plan document. The Duty to Cooperate partners were in general support of the policy options, and provided suggestions for the next stage of policy and site allocations drafting. The main transboundary matters raised at this stage were protected offices and Strategic Industrial Locations, and the Wandle Valley Regional Park. The WVRPT sought that the site allocations within their remit would take on board the aims of the WVRP such as opportunities to enhance and improve access to the river, the Wandle Trail, improving connectivity between green spaces and new public realm, preserving public rights of way, and the opening up inaccessible areas of river frontage. There was general support for the approach to the protection of Strategic Industrial Land, offices and employment land from boroughs within the FEMA including from Richmond. The GLA and Richmond would support its redesignation only if this was evidence based.

5.10 Separate engagement with the GLA secured useful feedback on policy options, such as support for intensification of industrial uses (where compliant with London Plan policy 2.17), and drew attention to taking into account neighbouring authorities in the relevant property market area (which is covered through specific Duty to Cooperate engagement with these boroughs), and to assess wider impacts on employment, supply chains, congestion and London's economic function, including servicing the Central Activities Zone. In response to the specific questions set out at this stage of the consultation, the proposed changes to include the Havelock Terrace area in the Industrial Business Park (IBP) were supported by the GLA in principle. Further discussion of the GLA's economic forecast and employment-related evidence continued to take place at this stage.

5.11 Outcomes: Discussions under the Duty to Cooperate did not raise any significant transboundary issues with adjoining boroughs or from the Duty to Cooperate bodies, but did provide some further information or context useful for preparing detailed policies and site allocations for the next stage of plan preparation. Engagement confirmed that demand for office and industrial land and jobs were also strong generally in London and in the neighbouring borough of Richmond. The prescribed Duty to Cooperate bodies and other organisations such as the WVRPT provided specific feedback outlining any related impacts from the specific questions in the consultation as well as relating this to their own plans or strategies or their infrastructure responsibilities.

Regulation 19 Submission stage consultation

5.12 The Submission version document was prepared taking account of the preceding feedback and new evidence including the outcomes predicted in the Integrated Impact Assessment (IIA) report. Aspects of the IIA report, including the Scoping report to inform the evidence base had already undergone consultation with statutory consultees and adjoining boroughs. The Submission version document and the IIA were published in March 2017. Specific Duty to Cooperate engagement took place again, this time took the form of targeted letters and emails which reflected the advanced stage of the draft Plan and the corresponding limited scope of any response (relating to soundness only). These bespoke letters and emails were drafted inviting them to meet to discuss any remaining issues, and reflected previous correspondence and responses where applicable. In the case of the prescribed bodies, the

correspondence also suggested how the proposed policies may affect their remit - for example the email to Network Rail offered a meeting to discuss any forthcoming Network Rail plans and/or proposed investment in railway infrastructure, land or property holdings or any other matters reflecting that there is a proposed policy (IE3) protecting railway arches. This aimed to encourage engagement and to help focus on any remaining strategic issues reflecting either issues/comments raised at earlier stages (where relevant) or the core functions of each of the organisations which responded, such as land holdings in the borough, infrastructure plans or strategies.

5.13 Overall, the main strategic matters identified during Duty to Cooperate consultation and meetings were:

- Office market and Central Activities Zone
- Strategic Industrial Land (SIL) and the Industrial Business Park
- Protected industrial areas important to south west London and Wandle Valley
- Ongoing Waste and safeguarded wharves dialogue
- Ongoing- agenda items enabling information and experience exchange in plan-making
- Information /evidence base update with the Duty to Cooperate bodies

5.14 The majority of respondents to Duty to Cooperate consultations letters and emails declined the invitation to meet and preferred to respond in written confirmation of support and /or that there were no remaining strategic issues raised by the Consultation. Meetings took place with the London borough of Lambeth, Westminster City Council (May 2017) and Kingston upon Thames (June) with the Regulation 19 LPEID as the focus for the discussions. The use of Article 4 directions to protect offices, and neighbourhood planning were also common themes of discussion. The GLA's Town Centre Health Check update was discussed with Kingston and it was noted that Kingston Town centre also contributes to meeting some of Wandsworth's shopping needs being a 'larger order' (Metropolitan) centre in the London shopping hierarchy. Kingston officers confirmed that its shopping hierarchy was unlikely to change. Cross-boundary discussions with Lambeth included safeguarded wharves and waste policies (in the acknowledgement that these issues are not part of review), managed workspace - which is included in Wandsworth's review and the Wandsworth CAZ. Wandsworth's commissioned study on the digital economy was tabled and it was noted that the GLA would be producing a new office market study imminently. Recent work by both Wandsworth and Lambeth officers on Housing and Economic Land Availability Assessment was also discussed. Cross-boundary discussion with Westminster centred around policy protection in the CAZ, and both Wandsworth and Westminster noted the growing importance of the managed workspace sector, and discussed approaches to enabling this. The proposed bridge from Nine Elms to Pimlico and the study looking at potential locations was also discussed, along with Battersea Heliport, and the new CAA consultation regulations were noted.

5.15 Common themes in both meetings and correspondence including with the GLA were the office market, Central Activities Zone and industrial land, borough-level demand and supply of offices in this location, local evidence results and relative policy direction. Westminster and Wandsworth both acknowledged the importance of the managed workspace

sector. The discussions revealed that boroughs shared a concern about the office to residential permitted development rights, which are time limited in the CAZ, and discussed the merits of including the CAZ under an Article 4 direction, as there was not a common approach to this. Strategic Industrial Land, in particular limited release and intensification of use was also a common theme, and the Duty to Cooperate engagement identified that there was general support for Wandsworth's approach in the review. There was also on-going waste and safeguarded wharves dialogue as some of the waste sites are also located in the industrial area that are being reviewed. It was recognised at Duty to Cooperate meetings between constituent boroughs that these on-going discussions would feed into the full review of the Local Plan.

5.16 Written responses and acknowledgements were received from the London boroughs of Lambeth, Kensington and Chelsea and Richmond, confirming there remain no outstanding cross-borough issues for the review. Similarly the other prescribed Duty to Cooperate bodies and related organisations engaged specifically under this Duty did not raise any outstanding issues. On-going discussions on waste and safeguarded wharves will continue beyond this iteration of the plan towards full review and were raised again at this stage by Kensington and Chelsea and by the PLA. Transport for London expressed support for bringing railway arches into economic use, considering flexibility as appropriate regarding B class uses, and for those arches in industrial use, suggested that B-class or industrial sui generis uses should be continued, in the context of protection of industrial uses. The Health and Safety Executive reiterated that some site allocations within the LPEID were within their consultation zone (which Wandsworth does acknowledge), and Thames Water sought provision of water and sewerage infrastructure. Many of the Duty to Cooperate consultees used the opportunity to update Wandsworth on contact details and welcomed on-going co-operation in the future. The Statement of Consultation provides more detail on the full representations made by these organisations which were: Thames Water, the Health and Safety Executive, Historic England, Highways England the National Grid, the PLA and Transport for London (part of the GLA group).

5.17 The Environment Agency's (EA) response noted that comments made previously have been incorporated, and referred to the new site allocations to comply with adopted policies regarding tidal defences (the Thames Estuary 2100 Plan - incorporated into the adopted plan) and to the adopted DMPD policy DMTS5 (strategic flood risk assessment). A meeting was held with the EA in June where EA provided an overview of their planning application consultation toolkit. The Civil Aviation Authority (CAA) confirmed in writing that they had no representations to make, however guidance on the planning application consultation procedure was also provided. The Marine Management Organisation (MMO) contacted Wandsworth specifically under the Duty to Cooperate in July to commence stakeholder engagement to discuss marine planning. A meeting took place in September 2017 jointly with Richmond Council - the main emphasis was on dissemination of a new MMO South East Marine Plan, and there was a general discussion on Wandsworth and Richmond-specific river-related issues/priorities and the integration with terrestrial plans. The GLA's response confirming general conformity with the London Plan was part of the consultation comments at this stage.

5.18 Outcomes: The targeted consultation, meetings and correspondence under the Duty to Cooperate confirmed that there were no outstanding cross-borough issues at this stage of the LPEID. The general discussion in the meetings provide a useful exchange of policy approaches, GLA advice, publications and evidence, and update on borough-level work on policy evidence and research studies. Other boroughs' experience of Article 4 directions regarding permitted development changes from office to residential has helped inform the Wandsworth approach in this respect, particularly regarding boundaries and approach to the CAZ. As Wandsworth has a designated neighbourhood forum and neighbourhood area, but has not yet received a draft neighbourhood plan, general discussion on neighbourhood planning provides useful feedback particularly regarding the management of resources required to support a neighbourhood plan. The meeting with Kingston-upon-Thames identified the potential to work together on an in-house Retail Needs Assessment which would be key evidence for the full review of the Wandsworth Local Plan which could have logistical and resource savings outcomes.

Summary of London Plan/GLA discussions:

5.19 The London Plan acknowledges the importance of industrial land in the Wandle Valley as being important to London as a whole and consequently there is an in-principle strategic objection to the loss of industrial land due to its significance to London as whole. Duty to Cooperate meetings with the GLA at Regulation 18-19 stages and during the informal policy options stages have enabled information sharing of key employment evidence carried out by the borough (ELPS) and the GLA, for example growth scenarios and employment forecasts. The principles and proposed policy direction regarding promotion of offices, retention of industrial land, intensification of employment uses (where loss of industrial land can be justified and in line with London Plan Policy 4.4) and proposed changes to the strategic Industrial Business Park boundary were identified to ensure that new policies and site allocations would not have adverse impacts on strategic planning. Similarly the LPEID has been informed by discussions with the GLA on emerging evidence relating to the proposed 'direction of travel' for the forthcoming London Plan review. The proposed policies relating to intensification and more efficient use of land is in line with the GLA's emerging evidence in the London Office Policy Review 2017 and the London Industrial Land Demand Study 2017 and the need to increase floorspace capacity for industry and warehousing over the coming plan period. Strategic issues such as waste sites, apportionment and protected wharves are an on-going item, and the merits of reviewing these issues as a part of a full review were discussed and justified. Further details on issues raised with the GLA/London Plan are contained in the Statements of Consultation, and in Regulation 19 consultation letter which also confirms general conformity with the London Plan.

6 Conclusions: Summary of Outcomes Following Constructive Co-operation

Summary of outcomes following constructive co-operation

6.1 Strategic issues such as protected industrial land and the London office market are key policy issues in the Employment and Industry Document. Initially the Duty to Cooperate meetings enabled the Council to communicate the scope of the Employment and Industry Review and to explain the timescale for the subsequent full review of the Wandsworth Local Plan. Strategically, engagement with the GLA enabled the Council to exchange information on the scope and results of evidence relating to employment and industry and to ensure that policy direction relating to strategic industry and employment land was in line with the London Plan, updated evidence, and with policy direction published in 'A City for all Londoners' which will inform the next London Plan. Successful co-operation is reflected in the consultation response letter of July 2017 confirming general conformity with the London Plan. Sub-regionally, Duty to Cooperate engagement with adjoining London boroughs enabled the exchange of information and evidence as well as providing feedback and best practice on the policy experience of those boroughs. This included approaches to Article 4 directions. Development of the London Plan, adjoining boroughs' local plan production, and the land holdings and business plans of other prescribed Duty to Cooperate bodies such as the Environment Agency and WRWA have been identified under the Duty to Cooperate. The resulting iterations of the LPEID have been able to address the strategic and cross boundary issues as well as identify relevant shared evidence and background information to better inform the revised policies and site allocations in the Submission version document. Cooperation with English Nature provided useful feedback on the baseline information collected for the Scoping report, and confirmed that the Council's screening on Habitats Assessment of the Proposed Submission Employment and Industry Plan did not require further assessment under the Habitats Regulations.

Conclusions

6.2 The Council considers that it has constructively collaborated with the prescribed Duty to Cooperate bodies, the GLA, adjoining London boroughs and other relevant stakeholders to meet the Duty to Cooperate requirements as set out in Section 110 of the Localism Act and in the NPPF. Whilst the scope of the Employment and Industry Document is limited, effective engagement has taken place in its preparation beginning with the scope, evidence base/evidence sharing, to the Submission stage. The Submission version Employment and Industry Document policies and site allocations reflect this engagement and there are no outstanding cross-boundary issues with the Duty to Cooperate stakeholders. Ongoing collaboration has also been required to fulfil the Duty to Cooperate obligations of other London boroughs, exchange best practice such as on Article 4 directions relating to offices, and there is on-going engagement with the four London boroughs forming part of the Western Riverside Waste Authority (WRWA) area. This on-going collaboration will be reflected in the subsequent full review of the Wandsworth Local Plan.

Appendix 1 Summaries of Duty to Co-operate discussions

Table 1.1

LIST OF CONSULTEES FOR DUTY TO COOPERATE		
LONDON BOROUGH	PRESCRIBED BODIES	OTHER CONSULTEES
Lambeth	Environment Agency	GLA/TfL
Croydon	Natural England	Network Rail
RB Kensington & Chelsea	Historic England	Port of London Authority
RB Kingston upon Thames	Wandsworth CCG/Wandsworth Public Health	Health and Safety Executive
Hammersmith & Fulham	Office of Rail Regulation	Thames Water
Merton	Transport for London	National Grid
Richmond Upon Thames	Civil Aviation Authority	Wandle Vally Regional Park Trust (WVRPT)
Westminster City Council	Marine Management Organisation	
	London Enterprise Partnership	
<p><u>PRESCRIBED BODIES THAT WANDSWORTH DOES NOT CONSIDER OF RELEVANCE FOR THE LOCAL PLAN:</u></p> <p>Integrated Transport Authority – Wandsworth is the Highways Authority for the area; Wandsworth's Transportation team are involved in the preparation of the Local Plan including site allocations.</p> <p>Highways Agency – There are no roads within Wandsworth borough that is controlled by the Highways Agency.</p> <p>The Office of Rail Regulation – Wandsworth considers that there are no strategic issues of relevance to discuss with the Office of the Rail Regulation, which is a statutory consultee and gets consulted on all our planning policy documents, including the Local Plan; however, it is not thought to be necessary to hold specific duty to cooperate meetings with this Office. In relation to railway and infrastructure, Network Rail have been included at all stages of the LPEID preparation due to land and infrastructure under their control, including railway arches, that directly relate to plans a site allocations in this review.</p>		

Table 1.2

REGULATION 18 (Preparation stage Dec 2015-Jan 2016)		
DUTY TO COOPERATE CONSULTEE	SUMMARY OF STRATEGIC/TRANSBOUNDARY ISSUES IDENTIFIED	ACTIONS (IF ANY)
LB Lambeth (meeting held)	Strategic Matters discussed: Office supply - Wandsworth to seek authorisation for a proposed Article 4 direction (B1(a) to C3) in particular parts of the Borough. Waste sites-discussed proposed amendment to the supporting text for Core Strategy Policy PL7 current (now adopted) Local Plan. Land for Industry and Waste) - will need to be updated in light of the LPEID.	Wandsworth to review comments and document any changes in the Statement of Consultation.
Historic England (meeting held)	No strategic issues identified. Comments on historic assets noted.	No actions required.
Kensington & Chelsea (meeting held)	Office supply - Wandsworth to seek authorisation for a proposed Article 4 direction (B1(a) to C3) in particular parts of the Borough.	No actions required.
L B Merton (meeting held)	Office supply - Wandsworth to seek authorisation for a proposed Article 4 direction (B1(a) to C3) in particular parts of the Borough. Merton shared their experience of putting into force an office to residential Article 4 direction in Wimbledon Town Centre and in the industrial areas which are trans-boundary issues with Wandsworth.	Experience noted. No actions required.
L B Hammersmith & Fulham (meeting held)	Office supply - Wandsworth to seek authorisation for a proposed Article 4 direction (B1(a) to C3) in particular parts of the Borough.	None
GLA (meeting held and on-going engagement as necessary)	No strategic issues identified. Strategic Matters discussed: Evidence base , office supply - Wandsworth to seek authorisation for a proposed Article 4 direction (B1(a) to C3) in particular parts of the Borough.	More detailed discussions necessary. Outcomes reported in Statement of Consultation
LB Richmond	Support for the approach to protecting office and industrial land.	None.

Table 1.3

POLICY OPTIONS CONSULTATION (Informal Options Oct-Nov 2016) This took the form of targetted consultation including with the Duty to Cooperate bodies. No specific Duty to Cooperate meetings were held.		ACTIONS (IF ANY)
DUTY TO COOPERATE CONSULTEE	SUMMARY OF STRATEGIC/TRANSBOUNDARY ISSUES IDENTIFIED	
Environment Agency	Flood risk. T2100 Plan and DPD policy DMS5 are relevant to the new site locations (tidal defences and flood risk). Waste sites and safeguarded wharves: support for retaining the existing policy approach at this stage.	Comments noted. Specific Duty to Cooperate consultation and meeting to be offered at Reg 19 stage.
GLA	Strategic-level economic/jobs growth scenarios and forecasts and uncertainties in the economy. Strategic Industrial locations: Council's approach supported, including in-principle support for change to the Industrial Business Park boundary. Any industrial areas considered to merit designation as SIL should meet criteria set out in the Land for Industry and Transport SPG, and that new areas of SIL would first need to be designated in the London Plan. Agreed that the Summerstown LSIA merits consideration for designation as SIL and which will be promoted through the forthcoming London Plan. Land for Industry and Transport SPG benchmark for industrial land release. Regeneration of Nine Elms continues to be supported. A pipeline of office floorspace will make a valued contribution to office floorspace stock at borough level, as well as providing for the national and international role of office space in the CAZ. Waste sites and safeguarded wharves: support for retaining the existing policy approach at this stage.	Clarified growth and jobs statistics with consultancy who produced the evidence base for the LPEID. Specific Duty to Cooperate consultation and meeting to be offered at Reg 19 stage.
Historic England	Strategic Industrial Land: sought an audit/characterisation of the heritage assets in this area be conducted to inform plans for the SIL and wider area.	Comments noted. Specific Duty to Cooperate consultation and meeting to be offered at Reg 9 stage.
L B Richmond	Strategic issues - London Office market - noted that there is potential for a lack of appropriate business space available within Wandsworth to meet future employment demand, which could have implications on neighbouring boroughs. SME sector: Richmond Council supported Wandsworth Council in promoting the provision of flexible business space to meet the needs of small and medium enterprises in appropriate locations. Demand for industrial and employment land remains strong.	Specific Duty to Cooperate consultation and meeting to be offered at Reg 19 stage.

POLICY OPTIONS CONSULTATION (Informal Options Oct-Nov 2016) This took the form of targetted consultation including with the Duty to Cooperate bodies. No specific Duty to Cooperate meetings were held.		ACTIONS (IF ANY)
DUTY TO COOPERATE CONSULTEE	SUMMARY OF STRATEGIC/TRANSBOUNDARY ISSUES IDENTIFIED	
Port of London Authority (PLA)	Waste and safeguarded wharves: noted that the Smugglers Way small industrial cluster includes the safeguarded Pier Wharf and Smugglers Way, commenting that it would be contrary to planning policy to allow these wharves to be redeveloped. Agreed with the approach to retaining DMPD policies DMI5, DMI6 and DMI7	Specific Duty to Cooperate consultation and meeting to be offered at Reg 19 stage.
Transport for London (Planning) and Transport for London (Property) -(part of the GLA group)	None strategic/transboundary issues identified.	Specific Duty to Cooperate consultation and meeting to be offered at Reg 19 stage.
Western Riverside Waste Authority (WRWA)	Responded to Area Spatial Strategy and site allocations and to the specific questions set out at this stage.. Strategic Issues: Protected wharves and waste -Cringle Dock (Strategic Protected Wharf and waste site). Sought a review of both waste apportionment and safeguarded wharves as part of this review.	The Council has only recently adopted its Local Plan (2016) and considers that its evidence in this respect is up-to-date. Nevertheless the Council remains in on-going discussions with the WPA (Waste Planning Authority) constituent boroughs, who have raised no issue with the Council's decision that waste/ apportionment targets are best considered as part of the full review of the Local Plan which is likely to accommodate further growth/housing growth. Chapter 5 of the DMPD is to be removed and retain the current wording of Policies DMI5, DMI6 and DMI7 of the DMPD within the review for clarity in both the

remaining adopted Local Plan and the review document.		
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<p>POLICY OPTIONS CONSULTATION (Informal Options Oct-Nov 2016) This took the form of targetted consultation including with the Duty to Cooperate bodies. No specific Duty to Cooperate meetings were held.</p>		
<p>DUTY TO COOPERATE CONSULTEE</p> <p>Wandle Valley Regional Park Trust (WVRPT)</p>	<p>SUMMARY OF STRATEGIC/TRANSBOUNDARY ISSUES IDENTIFIED</p> <p>Email correspondence highlighted the imminent publication of the WVRP Strategy. The WVRPT Heritage Lottery Funded project for the Earlsfield to Thames stretch of the Wandle would provide a lot of useful detail to complement the review. Wandsworth confirmed to that WVRPT that the Heritage Lottery Fund project would be reflected into the Local Plan Employment and Industry Document which sets out an Area Spatial Strategy for the Wandle Delta.</p>	<p>ACTIONS (IF ANY)</p> <p>Wandsworth to scope strategy for issues once published.</p>

Table 1.4

REGULATION 19 (Proposed Submission Mar-Apr 2017)		
DUTY TO COOPERATE CONSULTTEE	SUMMARY OF STRATEGIC/TRANSBOUNDARY ISSUES IDENTIFIED	ACTIONS (IF ANY)
L B Lambeth (meeting held)	No strategic issues relating to the LPEID. Waste apportionment. Traveller provision - based on emerging evidence Lambeth do not currently expect to have to approach neighbouring boroughs about meeting unmet needs. Wandsworth confirmed that their equivalent needs assessment included 'latent needs' of the gypsy and traveller community in 'bricks and mortar' accommodation and concluded that the current site was sufficient.	A proposed memorandum of understanding between boroughs within the WRWA is in progress.
RB Kensington and Chelsea	Confirmed that there are no strategic issues remaining relating to the LPEID. Waste apportionment.	On-going discussions between the WRWA area to be continued which will inform the Full Review of the Local Plan
LB Richmond upon Thames	No strategic issues relating to the LPEID. Wandsworth's approach to a range of issues within the Employment and Industry Document is noted and that there are no outstanding issues. Evidence base - Richmond confirmed that they had carried out recent employment research including analysis of the FEMA (Functional Economic Market Area) which could be shared.	Agreement to arrange another Duty to Cooperate meeting in 6 months after Richmond's Examination.
Westminster City Council (meeting held)	No issues relating to the LPEID. Other matters: Proposed bridge from Nine Elms to Pimlico - Westminster confirmed that it was still not supported by Pimlico residents. Battersea Heliport - Wandsworth confirmed that there were no indications that it was expanding, and that new development had been built up to the heliport's site boundary. The new CAA consultation regulations were noted.	Arrange another Duty to Cooperate meeting in 6 months.
RB Kingston upon Thames (meeting held)	No strategic issues relating to the LPEID. Student Housing including mixed use. Evidence base - potential to jointly commission new retail evidence was identified.	Joint working opportunities noted, but will be dependant on budget constraints and progress of each Local Plan.

REGULATION 19 (Proposed Submission Mar-Apr 2017)		
DUTY TO COOPERATE CONSULTTEE	SUMMARY OF STRATEGIC/TRANSBOUNDARY ISSUES IDENTIFIED	ACTIONS (IF ANY)
Environment Agency	No strategic issues relating to the LPEID. Document supported. Flood risk: EA confirmed that T2100 Breach Modelling was underway and that a planning application consultation toolkit will be updated.	Arrange another Duty to Cooperate meeting in 6 months.
Civil Aviation Authority (CAA) Aerodrome Standards Department	No strategic issues relating to the LPEID. Forwarded guidance on the planning application process.	None.
Marine Management Organisation (MMO) (Meeting held September 2017)	MMO contacted Wandsworth specifically under the Duty to Cooperate to discuss marine planning, the south east marine plan, Wandsworth specific issues/priorities and the integration with terrestrial plans. The main emphasis being on dissemination of the new MMO South East Marine Plan.	Contents of MMO's South East Marine Plan were noted. Joint stakeholder engagement with Richmond Council took place and a presentation of the work of the MMO and future S.E. Marine Plan took place in September 2017. Wandsworth to check consultation database and arrangements with the MMO and development management colleagues. Richmond to forward local bye-law regarding houseboats.

