



Duty to Co-operate (DtC) Statement

Wandsworth Local Plan Partial Review (LPPR)

Advisory Note

This version of the Duty to Co-operate Statement has been published at the **Submission Stage** of the Wandsworth Local Plan Partial Review.

This version of the document partially updates the Duty to Co-operate Statement published at the Regulation 19 consultation stage.

April 2025

Contents

1. Introduction 3

2. Context..... 3

3. Wandsworth Local Plan Review..... 8

4. Pre-Publication Consultation (Regulation 18) 10

5. Publication Consultation (Regulation 19) 11

6. Outcomes of Co-operation on Strategic Matters 11

7. Statement(s) of Common Ground 13

8. Engagement with Waste Planning Authorities 13

9. Conclusion 14

Appendix A - Schedule of co-operation with statutory stakeholders..... 15

Appendix B - Schedule of ‘Duty to Co-operate’ meetings held with neighbouring authorities and other/prescribed bodies. 36

1. Introduction

- 1.1. This statement outlines how the London Borough of Wandsworth is managing the requirements of the Duty to Co-operate throughout the Local Plan Partial Review, details of which are contained in Section 3.
- 1.2. The Duty to Co-operate 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 adopted 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 Co-operate requirements. The Local Plan provides the overarching spatial strategy for Wandsworth Borough, guiding the location, scale and type of future development up until 2038.
- 1.3. Local Planning Authorities are expected to be able to provide evidence of having successfully co-operated to plan for strategic issues with cross boundary impacts when their Local Plans are submitted for independent examination. Demonstrating the Duty to Co-operate is an important part of ensuring the soundness of local plan preparation. Co-operation 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 Co-operate' 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

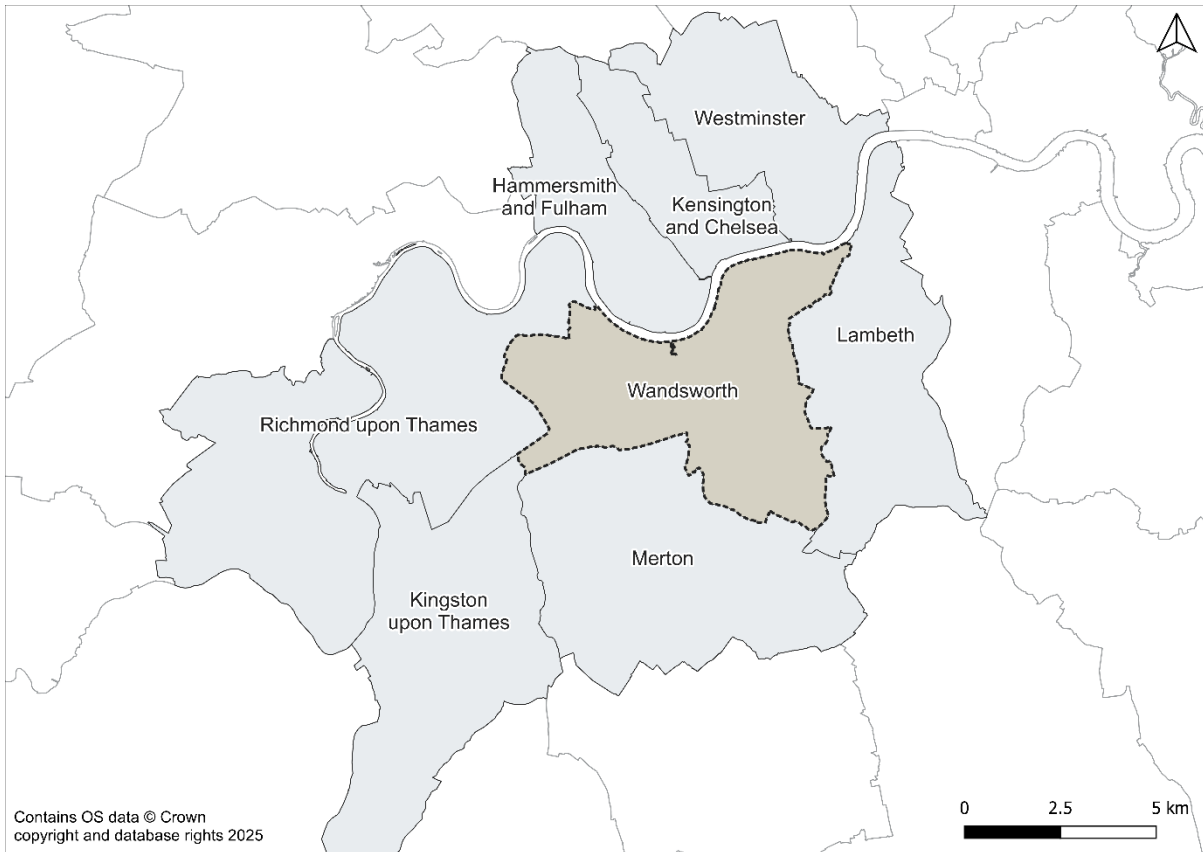
- 2.3. The NPPF states that Local Planning Authorities are under a duty to co-operate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries and this should clearly be reflected in individual Local Plans.

- 2.4. Paragraphs 24–27 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 Co-operate.
- 2.5. Paragraph 28 of the NPPF has also introduced a requirement to produce Statements of Common Ground (SoCG) throughout the plan-making process to document where effective co-operation 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 6.

Strategic Geography

- 2.6. The NPPF and PPG highlights that LPA's have a Duty to Co-operate on planning issues that cross administrative boundaries.
- 2.7. 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.
- 2.8. 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.

Map 1: The relationship between Wandsworth and neighbouring boroughs



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

Table 1: Neighbouring planning authorities' Local Plan status

Authority	Local Plan Status
London Borough of Lambeth	Adopted September 2021. Site Allocations Development Plan Document submitted for Examination in October 2024.
London Borough of Kensington and Chelsea	Adopted July 2024.
Kingston Upon Thames	New Local Plan in development, with a further Regulation 18 consultation planned for 2025
Merton	Adopted November 2024
Richmond Upon Thames	Examination hearings took place in June/July 2024. View to adopt early 2025.
Hammersmith and Fulham	Local Plan adopted February 2018.
Westminster	Adopted April 2021, currently undertaking a Partial Review. Regulation 19 consultation concluded on 9 May 2024. Submission draft submitted to the Secretary of State in November 2024. Public examination on the Partial

Review scheduled to take place between end of April and early May 2025.

London Context

- 2.9. As made clear in national policy and guidance, effective co-operation 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 meetings and correspondence throughout the production of the partially reviewed Wandsworth Local Plan.
- 2.10. 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 remains in general conformity with the London and 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.
- 2.11. Wandsworth shares a land boundary with the boroughs of Lambeth, Merton, Kingston upon Thames, and Richmond, whilst the boroughs of Hammersmith and Fulham, Kensington and Chelsea and Westminster are located across the River Thames to the north. Wandsworth has maintained regular and open communication with neighbouring boroughs throughout all stages of the Local Plan Partial Review, 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 Local Plan Partial Review at the Regulation 18 Stage. Following the Regulation 18 public consultation, all neighbouring boroughs 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.
- 2.12. All neighbouring boroughs were again invited to comment on the Local Plan Partial Review at the Regulation 19 Stage, with invitations also provided for meetings to discuss any cross-boundary or strategic matters considered to be arising. A record of these meetings is listed in Appendix A.
- 2.13. 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

2.14. 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 (now South-West London Integrated Care Board) 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-annually, as do subject-specific working groups. It is attended by major landowners, developers and officers of the public authorities.
- **Wandsworth Chamber of Commerce** is an organisation that brings together businesses of all sizes across the borough and provides a particularly important representative role for smaller and early-stage businesses, along with networking and advice services. The Chamber hosts over 60 business events each year and provides support for its business members via business clinics, workshops and seminars. Wandsworth Council works closely with the Chamber of Commerce as a key partner and is a long-standing Patron Member.

Wandsworth Joint working

2.15. 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. It is not anticipated that this relationship has any implications for the local plan review.
- 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. It is not anticipated that this relationship has any implications for the local plan review.
- 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 (now South West London Integrated Care Board), 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. It is not anticipated that this relationship has any implications for the local plan review.
- Public Practice engagement events, which involve officers from planning authorities within and outside London and provide a format for the sharing of good

practice. It is not anticipated that this relationship has any implications for the local plan review.

- Wandsworth Council officers attend the regular Housing Strategy Group, which incorporates internal and external housing colleagues, enabling officers to have a clear understanding of current housing requirements, and the current pressures on different form of housing throughout the borough. In addition, officers have used this forum to keep other forum members up to date on the progress of the local plan Partial Review and to seek feedback on the emerging policy approach and wider strategic aims relating to the Partial Review.

2.16. Since 1st 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. Joint team meetings are held throughout the year where DtC issues are also discussed. This means that Richmond and Wandsworth have an ongoing dialogue on strategic planning issues impacting both boroughs.

Prescribed bodies

2.17. 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 - Scoping Stage

3.1. The Council started a Partial Review of its current Local Plan in 2023. The Partial Review sets out to review and update policy LP23 Affordable Housing and other policies as they relate to strengthening the provision of homes for social rent for local people, together with any other consequential changes necessary for consistency across the plan.

3.2. Wandsworth Borough Council are seeking:

- To strengthen the Local Plan policy by setting out a clear policy requirement for new housing developments in the borough to provide at least 50% of dwellings as affordable homes delivered on site
- A greater proportion of all new affordable homes to be genuinely affordable, preferably a 70/30 split in favour of social rent
- To require affordable housing from small sites below the current threshold of 10 or more homes (gross)

Stage 2 - Pre-Publication Stage (Regulation 18)

- 3.3. Wandsworth Borough Council held the first six week consultation on the Partial Review of the Local Plan (Regulation 18) from 23rd October to 4th December 2023. The first consultation included the supporting Sustainability Appraisal and the Council also produced an Equality Needs and Impact Assessment and a Habitats Screening Assessment. The Council consulted with a range of stakeholders, including both statutory and non-statutory bodies, as well as local communities.

Stage 3 - Publication Stage (Regulation 19)

- 3.4. The new Local Plan will form part of the development plan for the borough. Following the Regulation 18 consultation, the Council developed the partially reviewed policies, taking into account the outputs of the evidence base reports (Housing Need Assessment and Whole Plan Viability Assessment) and consultation responses. This produced the Regulation 19 version of the Plan that the Council intends to submit to the Secretary of State for Examination. 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.

Stage 4 - Submission Stage (Regulation 22)

- 3.5. Following the Regulation 19 consultation, the Council considered the feedback received in representations, including that received from prescribed bodies. These considerations, inclusive of the Council's response is set out in the accompanying Statement of Consultation. The Council submitted the Partially Reviewed Local Plan to the Secretary of State for Examination in April 2024.

Other Relevant Context

- 3.6. 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.
- 3.7. 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 Partial Review is subject to two stages of public consultation:

What	When
Consultation Statement, setting out the scope of review (Regulation 18)	Autumn 2023
Publication consultation on the proposed submission version of the Partial Review Local Plan (Regulation 19)	Winter/Spring 2025

- 3.8. Consultation and engagement on the Local Plan has, and will continue to be, carried out in accordance with the measures sets out in Wandsworth’s Statement of Community Involvement (SCI) that was adopted by the Council in 2019 and updated in 2025. Wandsworth Council have also published guidance for applicants on early community engagement called [Raising the Bar](#), and have published a [Developer Protocol](#) which sets out how the Council will work with developers.
- 3.9. With regards to the emerging Wandsworth Local Plan Partial Review, at each stage summaries of comments received and responses from stakeholders will be produced and made available for viewing on the Local Plan pages of the Council’s website.
- 3.10. Read alongside current, or future, Statement of Common Grounds (SoCG), these documents will demonstrate progress made on matters between the Council and stakeholders.
- 3.11. As evidence of the Local Plan’s positive preparation, this DtC Statement has been updated is included as part of supporting documentation that accompanies the submission version of the Local Plan document. It should assist the Planning Inspector in determining that the Council has fulfilled its Duty to Co-operate responsibilities.

4. Pre-Publication Consultation (Regulation 18)

- 4.1. The Council reviewed and updated the relevant local plan policies scoped for the Partial Review whilst also taking account of the consultation responses and outcomes from Duty to Co-operate and engagement activities. The Pre-Publication Local Plan, which was the Council’s first formal draft of the revised Local Plan, was subject to public consultation from October 2023 to December 2023.
- 4.2. The Council received consultation responses to the Pre-Publication consultation from the following Duty to Co-operate bodies:
- Natural England
 - National Highways
 - NHS Property Services Ltd
 - The Mayor of London
- 4.3. 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 on the Local Plan Partial Review.

- 4.4. All of the consultation responses received were published within the 2025 draft Statement of Consultation published at the Regulation 19 stage

5. Publication Consultation (Regulation 19)

- 5.1. The Council reviewed and updated the relevant local plan policies scoped for the Partial Review whilst also taking account of the consultation responses and outcomes from Duty to Co-operate and engagement activities. The Publication version of the Local Plan, which was the Council's second formal draft of the revised Local Plan, was subject to public consultation from 13th January 2025 until 24th February 2025.
- 5.2. At the commencement of the consultation, the Council invited all prescribed bodies to respond. It additionally offered meetings to all neighbouring Boroughs and certain prescribed bodies which had previously expressed an interest in the Local Plan Partial Review, including Natural England, Western Riverside Waste Authority (WRWA), the Port of London Authority, Marine Management Organisation and National Highways.
- 5.3. The Council received formal consultation responses to the Publication consultation from the following prescribed Duty to Co-operate bodies:
- National Highways
 - Marine Management Organisation
 - Mayor of London
 - Port of London Authority
 - Historic England
 - Natural England
 - Environment Agency
 - NHS Healthy Urban Development Unit (HUDU)
- 5.4. The Council also received formal consultation responses to the Publication consultation from the following neighbouring or strategic authorities:
- London Borough of Lambeth
 - London Borough of Merton
 - London Borough of Southwark
 - The Greater London Authority (GLA)
- 5.5. After the consultation period, the representations received were considered. The consideration of these representations and Council responses is set out in the accompanying Statement of Consultation.

6. Outcomes of Co-operation on Strategic Matters

- 6.1. Alongside formal notifications of the public consultation on the Pre-Publication Local Plan (Regulation 18) and the Publication Local Plan (Regulation 19) which were sent to all of the neighbouring authorities and prescribed bodies, the Council extended an invitation to all of the neighbouring authorities and certain prescribed bodies to meet with Council officers. The organisations that the invitation was extended to is recorded in Appendix A, and a schedule of the meetings that were held is recorded in Appendix

B. More detailed notes of meetings are intended to be appended to signed Statements of Common Ground in due course.

- 6.2. 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.
- 6.3. The table below provides a summary of the response of each prescribed body which responded to the Council's Publication (Regulation 19) consultation and whether there are considered to be any cross-boundary or strategic matters outstanding at the time of submission.
- 6.4. More detail on the outcomes of individual engagement with prescribed bodies or neighbouring authorities can be found in the Appendices to this Statement, the accompanying Statement of Consultation and individual Statements of Common Ground.

Name of Body	Summary of Response received at Regulation 19 stage	Any cross-boundary or strategic matters outstanding?
National Highways	No comments	No
Marine Management Organisation	No comments	No
Mayor of London (Greater London Authority)	<p>Response raised concerns over general conformity of Policy LP23 with respect to:</p> <ul style="list-style-type: none"> • Local Fast Track Route • Review Mechanisms <p>Response requested other amendments to the following policies:</p> <ul style="list-style-type: none"> • LP28 in relation to consistency with London Plan Policy H15 and the relationship between the proposed policy and the London Plan Fast Track Route • LP29 in relation to consistency with London Plan Policy H16 • LP30 in relation to the tenure requirements of the 'remaining 30% of units' • LP31 in relation to reference to the London Plan Benchmark Target 	The Council will continue to work constructively with the Greater London Authority to ensure the Council's Local Plan policies are consistent with the London Plan, whilst responding to local circumstances and justification.
Port of London Authority	No comments	No
Historic England	No comments	No
Natural England	No comments	No
Environment Agency	No comments	No

NHS Healthy Urban Development Unit (HUDU)	No comments	No
London Borough of Lambeth	No comments	No
London Borough of Merton	Support for proposed policies	No
London Borough of Southwark	No comments	No

7. Statement(s) of Common Ground

- 7.1. Paragraph 28 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 co-operating 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 co-operating to address them. It demonstrates that the Local Plan is based on effective and ongoing co-operation 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.
- 7.2. Between the Publication consultation and the submission of the Local Plan, the Council has commenced a process of agreeing Statements of Common Ground with a number of prescribed bodies. The status of each Statement of Common Ground at the time of submission is set out in Appendix A. Following submission, the Council will continue to progress Statements of Common Ground with a view to having all Statements of Common Ground agreed in advance of hearing sessions. It may be that a need for further Statements is identified beyond those in progress at the time of submission. All Statements of Common Ground will be added to the examination library when signed.

8. Engagement with Waste Planning Authorities

- 8.1. Due to the nature and scope of the Local Plan review, the Council did not consider it necessary to undertake specific engagement with waste planning authorities. However, the Council met with the Western Riverside Waste Authority (WRWA) in January 2025 as part of the Duty to Co-operate and in light of the need to positively engage with relevant stakeholders. There were no specific strategic or cross-boundary matters which required addressing as part of this engagement.

9. Conclusion

- 9.1. During the preparation of the Local Plan Partial Review, the Council has engaged effectively and on an ongoing basis with all prescribed bodies and necessary stakeholders as required by the Duty to Co-operate.
- 9.2. The Submission Version of the Local Plan Partial Review (Town and Country Planning Act (Local Planning) (England) Regulations 2012) has been informed by the representations received by prescribed bodies and neighbouring authorities during the engagement and co-operation process.
- 9.3. This report and the accompanying Statement of Consultation demonstrate how the Council has complied with its Duty to Co-operate and will be kept up-to-date to assist the Inspector overseeing the Examination in Public of the Council's Local Plan Partial Review as evidence that the Council's Plan is based on effective joint working across local authority boundaries and that the Council has actively fulfilled its legal responsibilities in preparing that plan.
- 9.4. The Duty to Co-operate Statement has been specifically updated prior to submission of the Local Plan to take account of new meetings and ongoing engagement made under or since the Regulation 19 consultation with key stakeholders and partners, and to provide an up-to-date position on Statements of Common Ground being advanced with other bodies.
- 9.5. The Council has maintained detailed records of its compliance with the Duty to Co-operate and will make these available where required to assist with the Examination in Public.

Appendix A - Schedule of co-operation with statutory stakeholders

Ref.	Organisation	Correspondence sent	Meeting/ Response Date	Correspondence Received (Y/N)	Summary of Notes
Prescribed Bodies					
1	Environment Agency	09.05.2024	n/a	Y	The Environment Agency had no comments to make at this stage.
		05.03.2025	05.03.2025	Y	The Environment Agency had no comments to make at this stage as the proposed changes to the plan fall outside of the remit of the Environment Agency
		24.04.2025	n/a	n/a	The Council contacted the Environment Agency on 24 th April 2025 inviting them to agree a Statement of Common Ground. The Statement of Common Ground will be added to the examination library when signed.
2	Historic England	Comment received as part of Reg 18 consultation	n/a	Y	<p><i>Thank you for the opportunity to comment on the above consultation. As the Government's adviser on the historic environment, Historic England is keen to ensure that the conservation and enhancement of the historic environment is taken fully into account at all stages and levels of the Local Plan process.</i></p> <p><i>This Partial Review focuses solely on Policy LP23 (Affordable Housing) and other policies which relate to strengthening provision of homes for social rent. The Regulation 18 is very high-level, and the proposed scope does not appear to have any implications for the historic environment. If any specific heritage issues arise as a result of the consultation, please not hesitate to contact us. We would also like to be consulted again at Regulation 19 stage, by which time more detail should be published, and we will be in a position to reassess the proposals in case any heritage issue do develop.</i></p> <p><i>It should be noted that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially Object to any specific development proposal which may subsequently arise from these documents, and which may have adverse effects on the environment.</i></p>
		09.05.2024	n/a	Y	<p><i>Thanks for getting in touch regarding the Local Plan Partial Review and the forthcoming duty to co-operate meetings.</i></p> <p><i>Given the nature of the review, we do not foresee any historic environment issues (please see our letter attached) and will not be attending. Please do let us know if things change and any historic environment implications should arise.</i></p>

Ref.	Organisation	Correspondence sent	Meeting/ Response Date	Correspondence Received (Y/N)	Summary of Notes
		Comment Received as part of Reg 19 consultation	n/a	Y	<p><i>Thank you for the opportunity to comment on the Wandsworth's Regulation 19 Consultation on the Local Plan Partial Review. As the Government's adviser on the historic environment, Historic England is keen to ensure that the conservation and enhancement of the historic environment is taken fully into account at all stages and levels of the Local Plan process.</i></p> <p><i>The partial review is focused on:</i></p> <ul style="list-style-type: none"> • <i>Policy LP23: Affordable Housing</i> • <i>Policy LP24: Housing Mix</i> • <i>Policy LP28: Purpose-Built Student Accommodation</i> • <i>Policy LP29: Housing with Shared Facilities</i> • <i>Policy LP30: Build to Rent</i> • <i>Policy LP31: Specialist Housing for Vulnerable People and for Older People</i> <p><i>Having looked at the proposed changes, there does not appear to be any implications for the historic environment. However, should any heritage issues arise as a result of the consultation please do not hesitate to get in touch.</i></p> <p><i>It should be noted that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from these documents, and which may have adverse effects on the environment.</i></p>
3	Natural England	09.05.2024	06.06.2024	N	<p>LBW provided an update on the status of the Partial Review.</p> <p>Natural England noted that on local plan reviews, the main issue arising for Natural England tends to be the Habitat Regulations Assessment. LBW previous HRA only goes as far as the screening stage, but there is some mention of mitigation at the screening stage – Natural England noted that any kind of mitigation needs to come at the appropriate assessment stage and if the HRA is revisited as part of the Partial Review, LBW could make wording more robust. Natural England stated they are updating their guidance to match as closely to the regulations as possible and it would be helpful if the HNA could match this approach.</p>

Ref.	Organisation	Correspondence sent	Meeting/ Response Date	Correspondence Received (Y/N)	Summary of Notes
					LBW also provided an update on the Clapham Junction Masterplan and Natural England raised that this would provide a good opportunity to consider nature recovery and corridors. LBW were informed the National Trust are undertaking some work along the River Wandle which links to nature recovery.
			n/a	Y	<p>Following the meeting on 6th June, Natural England sent over a paragraph which summarises the position on the inclusion of mitigation as part of the HRA process which was discussed in the meeting –</p> <p><i>Please note that, recent case law ('People Over Wind') outlines that mitigation measures should not be assessed through an HRA to 'screen out' impacts at the stage of considering Likely Significant Effects (LSE), rather avoidance / mitigation measures should be considered through an Appropriate Assessment. Therefore where mitigation measures are proposed to avoid a likely significant effect, your authority's HRA will need to include an Appropriate Assessment under Regulation 63(1) of The Conservation of Habitats and Species Regulations 2017 (as amended). Please note Natural England are a statutory consultee for Appropriate Assessments and should be re-consulted once your authority has completed its HRA.</i></p>
		10.10.2024	21.10.2024	Y	Natural England provided feedback on a draft of the Regulation 19 HRA Screening Report shared by Wandsworth Council. Feedback included comments on the methodology section, the 'types of impact' section and air quality section.
		22.10.2024	24.10.2024	Y	<p>LBW met with Natural England to discuss the Regulation 19 HRA and the feedback given on the initial draft.</p> <p>Natural England recommended that Section 5 – Types of Impacts could be less detailed due to the fact that the policy proposals are unlikely to result in any new development, meaning the partial review could largely rely on the findings of the 2022 HRA undertaken for the Adopted Local Plan (2023).</p>
		Comment Received as part of Reg 19 consultation	n/a	Y	<i>Thank you for your consultation request on the above Strategic Planning Consultation, dated and received by Natural England on 13th January 2025. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England have no comments to make on your consultation request for the Local Plan Partial Review and Sustainable</i>

Ref.	Organisation	Correspondence sent	Meeting/ Response Date	Correspondence Received (Y/N)	Summary of Notes
					<p>Appraisal for Wandsworth Council. We also note the changes to six of your other policies for consistency or clarity as listed below:</p> <ul style="list-style-type: none"> • Policy LP23: Affordable Housing • Policy LP24: Housing Mix • Policy LP28: Purpose-Built Student Accommodation • Policy LP29: Housing with Shared Facilities • Policy LP30: Build to Rent • Policy LP31: Specialist Housing for Vulnerable People and for Older People <p>For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.</p>
		24.04.2025	n/a	n/a	The Council contacted Natural England on 24 th April 2025 inviting them to agree a Statement of Common Ground. The Statement of Common Ground will be added to the examination library when signed.
4	The Civil Aviation Authority	Comment received as part of Reg 18 consultation	n/a		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.
		05.06.2024	n/a	N	n/a
		05.03.2025	n/a	N	n/a
5	Homes England (previously HCA)	05.06.2024	n/a	N	n/a
		05.03.2025	n/a	N	n/a
6	NHS Healthy Urban Development Unit (HUDU)	05.06.2024	n/a	N	n/a
		05.03.2025	21.03.2025	Y	<p>Thank you for your email. Apologies for the delay in getting our response across to you.</p> <p>We have reviewed the corresponding local plan partial review consultation documents in conjunction with NHS partners in South West London's ICB and can confirm we have no substantial comments to submit against any of the draft policies included within this phase of the Council's local plan review.</p> <p>Nevertheless, we welcome many of the amendments made, particularly to policy LP31: Specialist Housing for vulnerable people and for older people and would like to take this opportunity to reiterate the importance of consulting relevant NHS partners in relation to any redevelopment of these types of specialist housing.</p>

Ref.	Organisation	Correspondence sent	Meeting/ Response Date	Correspondence Received (Y/N)	Summary of Notes
					<i>We wish you the best of luck with the submission and look forward to the next phase of the council's local plan review.</i>
7	Transport for London	09.05.2024	n/a	Y	<i>My understanding is that the Partial Review is limited to affordable housing and related policies and wouldn't affect other parts of the Local Plan such as transport, area policies or site allocations which would be of interest to TfL. If this is still the case I don't think there is a need to arrange a Duty to Co-operate (DtC) meeting. If you need to demonstrate that DtC requirements have been met, there could be an exchange of correspondence confirming the limited nature of the review</i>
		05.03.2025	n/a	N	n/a
8	National Highways (formerly Highways Agency)	09.05.2024	n/a	Y	No meeting held - <i>We are of course happy to meet with you but as the closest part of our network to Wandsworth Borough is the M4, M11 and M3 (outside of the borough) it may be that we are not well placed to add any value during a meeting.</i>
		12.12.2024	13.01.2025	N	LBW provided an update on the status of the Partial Review. National Highways noted that the proposals were unlikely to significantly impact the national strategic road network given the Brouchs distance from major highways.
		Comment Received as part of Reg 19 consultation	n/a	Y	National Highways Ref: NH/25/9513 <i>Thank you for your email inviting National Highways to comment on the above consultation and indicating that a response is required by 24 February 2025.</i> <i>National Highways was appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In relation to this consultation, our principal interest is safeguarding the operation of the M4 that is located to the northwest of Wandsworth in the London Borough of Hounslow. This is some distance away from Wandsworth, approximately 3.5km from the administrative area to the easternmost section of the motorway.</i>

Ref.	Organisation	Correspondence sent	Meeting/ Response Date	Correspondence Received (Y/N)	Summary of Notes
					<p>The consultation is seeking views on updates to the following policies</p> <ul style="list-style-type: none"> • Policy LP23: Affordable Housing • Policy LP24: Housing Mix • Policy LP28: Purpose-Built Student Accommodation • Policy LP29: Housing with Shared Facilities • Policy LP30: Build to Rent • Policy LP31: Specialist Housing for Vulnerable People and for Older People <p>We have examined the proposed changes in the partial review and are content that they will have no implications for the M4, particularly due to the distance from the motorway and the neutral effect of the policies on vehicular trip generation. We have no further comments to make in respect of this consultation.</p> <p>We look forward to continuing to participate in future consultations and discussions. In the meantime, if you have any questions with regards to the comments made in this response, please do not hesitate to contact us at planningse@nationalhighways.co.uk</p>
9	The Marine Management Authority (MMO)	09.05.2024	12.06.2024	N	<p>LBW provided an update on the status of the Partial Review.</p> <p>The MMO plans to undertake engagement and implementation sessions with local authorities related to the South East Marine Plan.</p> <p>The MMO and LBW agreed that the Partial Review has very limited impact on the operations of the MMO, but where new development is proposed along the shoreline and any industrial areas, LBW agreed to engage with the MMO.</p> <p>LBW also provided an update on the status of the Clapham Junction masterplan.</p>
		12.11.2024	14.01.2025	N	<p>LBW provided an update on the status of the Partial Review.</p> <p>The MMO noted that the proposals have limited impact on the scope of the MMO unless there were any developments proposed on the shoreline.</p>

Ref.	Organisation	Correspondence sent	Meeting/ Response Date	Correspondence Received (Y/N)	Summary of Notes
					The MMO asked how the proposals would impact BNG policies and LBW stated the partial review is unlikely to have any implications for BNG policies in the Local Plan, but BNG would likely be prevalent in the next full review of the Local Plan.
		05.03.2025	05.03.2025	Y	<p><i>As we discussed at our meeting, given the specific focus of this review, there is limited strategic overlap with the south east marine plan policies with regard to housing in Wandsworth – except for those that impact the inter-tidal zone.</i></p> <p><i>We advise that you take note of any relevant policies within the South East Marine Plan documents in regard to areas within the Wandsworth Local Plan Partial Review area that may impact upon the marine environment. We recommend inclusion of the South East Marine Plan when discussing any themes with coastal or marine elements (including tidal area of the Thames River, or tidal extent of any river) and recommend that you follow a whole-plan approach when considering the marine plan policies, please see below for more detail.</i></p>
10	The Office of Rail Regulation	Comment received as part of Reg 18 consultation	n/a	Y	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 co-operate meetings or other engagement activities beyond the normal statutory consultation procedures with this Office.
		09.05.2024	N/A	Y	<p><i>Thank you for your emails of 9th and 14th May regarding a Partial Review of the local plan through the Duty to Co-operate process.</i></p> <p><i>It would seem that what you're looking to discuss primarily relates to housing issues which is outside the remit of the Office of Rail and Road (ORR).</i></p>
11	Greater London Authority (GLA)	n/a	23.01.2024	N	<p>WBC provided an overview of the Local Plan review and the Reg18 responses received to date.</p> <p>The GLA expressed a potential concern over any disapplication of threshold / fast track approach, however GLA not completely opposed to changes which provide a locally justified approach to the London Plan where this leads to an increase in affordable housing delivery but requires strong evidence.</p>

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					<p>GLA showed a willingness for flexibility on the threshold approach as long as evidence demonstrates any flexibility would not harm affordable housing supply.</p> <p>GLA general position is that the existing threshold approach increases affordable housing overall and speeds up the planning process, and that any disapplication could have the unintended consequence of reducing affordable housing delivery by requiring more schemes to go through the viability tested approach.</p>
		09.05.2024	07.06.2024	N	<p>LBW provided an update on the status of the Partial Review.</p> <p>GLA noted they had no objections in principle to the small site or tenure split aspirations and noted the only potential issue is with regards to exceeding the 35% affordable housing threshold set out in the London Plan. The GLA noted they have robust evidence that the threshold approach works well and is delivering good numbers of affordable housing – the GLA emphasised that because of the extent of evidence they have to support this policy, it would be challenging for a borough to challenge this. The GLA also have evidence to demonstrate that applications which go down the viability tested route, the fewer affordable housing units are delivered.</p> <p>GLA emphasised the difficulty of looking at one policy area in isolation as part of a local plan review.</p> <p>GLA are undertaking a SHLAA update (Land4London) and will also be publishing their updated Gypsy and Traveller Needs Assessment in Summer 2024.</p> <p>In terms of student housing, the GLA advised LBW to look at Islington's draft policy which focussed on prioritising conventional housing which is the approach LBW members wish to pursue. Meanwhile, the GLA noted there is evidence to show that PBSA frees up HMO units. The GLA noted that it is better to work with the PBSA sector and use policy allocations to control PBSA numbers. The GLA hope to publish their Student Housing LPG in August, amongst other LPG's.</p> <p>LBW updated on the Clapham Junction masterplan.</p>

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		15.08.2024	18.09.2024	N	<p>LBW provided an update on the status of the Partial Review, and progress made since previous meeting.</p> <p>LBW presented the GLA with draft policy wording for LP23, LP24 and LP28 and discussed rationale and evidence behind choice of policy wording to meet LBW ambitions.</p> <p>GLA raised no specific objections to LP24 and LP28, however did note that they may have concerns over LP23, which could amend the London Plan policy threshold approach.</p>
		12.11.2024	10.12.2024	N	<p>LBW provided an update on the status of the Partial Review, and progress made since last meeting on the evidence base and the 19th November transport committee decision.</p> <p>The GLA highlighted a potential concern over the proposed wording for LP23 which would introduce an alternative threshold to the London Plan approach.</p>
		12.11.2024	12.02.2025	N	<p>LBW provided an update on the status of the Partial Review, and progress made since previous meeting.</p> <p>The GLA raised concerns about the proposals including the departure from the London Plan threshold approach and the potential to disincentivize residential development in Wandsworth.</p> <p>The GLA noted they had no opposition to reducing requirement for intermediate rented products but noted that the 70:30 tenure split may challenge viability.</p> <p>LBW noted that some sites in Wandsworth already achieve 50% affordable housing, with one site reaching 100% social rent. LBW also noted that high-value areas in the Borough can support greater levels of affordable housing provision.</p> <p>The GLA noted that the proposed affordable housing requirement for housing with shared facilities was not in conformity with the figure set in the London Plan.</p> <p>The GLA suggested a site-specific approach could optimize delivery of affordable housing rather than a blanket borough-wide approach as proposed.</p>

Ref.	Organisation	Correspondence sent	Meeting/ Response Date	Correspondence Received (Y/N)	Summary of Notes
					<p>The GLA encouraged LBW to include a figure to support Specialist Older Peoples housing policy. The GLA also encouraged LBW to showcase evidence of successful affordable housing schemes delivered through S106 contributions.</p> <p>The GLA gave a brief update on the London Plan update and noted the draft housing figures could be expected in November 2025 and that affordable housing and viability guidance was still under review.</p>
		Comment Received as part of Reg 19 consultation	24.02.2025	Y	See representation published on the Greater London Authority website here .
12	Integrated Transport Authority	n/a	n/a	N	The Council is the Highways Authority for the area. Due to the scope of the review, the Council's transport planners have had peripheral involvement in the Local Plan review. Maximising S106 contributions towards housing is not expected to materially impact on the delivery of transport improvements necessary to support sustainable growth.
13	Metropolitan Police Service (MPS)	Comment Received as part of Reg 19 consultation on the 17 February 2025	n/a	Y	<p><i>Whilst it is acknowledged the partial Local Plan review is not consulting on the Site Allocations contained within the adopted Local Plan, the MPS wish to reiterate the points made within previously representations submitted to the now adopted Local Plan objecting to the Ponton Road site allocation.</i></p> <p><i>The objection to the allocation is summarised below. The Metropolitan Police Service (MPS) made representations to Site Allocation NE4 in previous drafts of the plan, including on 3rd February 2022, in respect of the Regulation 19 Local Plan consultation, and 1st March 2021, in respect of the Regulation 18 Local Plan consultation. Those representations remain to be addressed within the adopted Local Plan. The site is owned by the Mayor's Office for Policing And Crime (MOPAC) and operated by the MPS as a workshop facility. The MPS is reviewing its current Estate Strategy including on-going disposals. It appears likely that the site is likely to be retained for operational use. The MPS are therefore keen to ensure that surrounding allocations will not have detrimental impacts on the security and operation of the MPS facility. In the unlikely event that the site were disposed of and redeveloped, the work carried out by MPS to date suggests that the proposed allocation would make redevelopment challenging. Complexities included a triangular site, the school requirement, height limitations and proposals for a public footpath through the site. The Infrastructure Delivery Plan, which was adopted in October 2024, has a section at page 23 regarding primary school requirements, indicating that the</i></p>

Ref.	Organisation	Correspondence sent	Meeting/ Response Date	Correspondence Received (Y/N)	Summary of Notes
					<i>need or otherwise to allocate for a school use at this site is unclear. The demand is not certain at this stage and another site exists. In this context, it appears unreasonable to burden an operational MPS site with such an allocation.</i>
Additional Bodies					
13	Port of London Authority	09.05.2024	07.06.2024	N	<p>LBW provided an update on the status of the Partial Review.</p> <p>PLA noted that their main concerns would be regarding protected walks and riverside paths along the Thames – should these items come into question, the PLA would like to be consulted. The PLA also requested to be consulted where potential future development is proposed in proximity to the boroughs safeguarded wharves, and with regards to the potential Pimlico bridge development in the borough.</p> <p>PLA noted that in 2022 they published their Thames Vision document and have been undertaking work on the masterplan on a borough-by-borough basis with planning policy and regeneration officers and sometimes transport officers. PLA noted their minor engagement with members in boroughs to date, and also noted that the GLA and TfL have been involved in the process to ensure PLA ambitions align with TfL and GLA ambitions.</p>
		12.11.2024	13.01.2025	N	<p>LBW provided an update on the status of the Partial Review, and progress made since previous meeting.</p> <p>PLA noted the potential impacts of policy changes on Student Housing and Build-to-Rent schemes.</p>
		Comment Received as part of Reg 19 consultation	05.03.2025	Y	<p><i>Apologies for delay in this response from the Port of London Authority (PLA) with regard to the London Borough of Wandsworth Regulation 19 consultation on the Partial review of the Local Plan, in relation to updating the following six policies:</i></p> <p><i>Policy LP23: Affordable Housing</i> <i>Policy LP24: Housing Mix</i> <i>Policy LP28: Purpose-Built Student Accommodation</i> <i>Policy LP29: Housing with Shared Facilities</i> <i>Policy LP30: Build to Rent</i> <i>Policy LP31: Specialist Housing for Vulnerable People and for Older People</i></p>

Ref.	Organisation	Correspondence sent	Meeting/ Response Date	Correspondence Received (Y/N)	Summary of Notes
					<p>To confirm on review of the consultation documents the PLA has no comments to make on the proposed amendments.</p> <p>Furthermore, in terms of contact information. You can include me as the principal contact at the PLA for future consultations.</p>
14	Local Enterprise Partnership	05.06.2024	n/a	N	n/a
15	Western Riverside Waste Authority	12.11.2024	15.01.2025	N	<p>LBW provided an update on the status of the Partial Review.</p> <p>The WRWA noted it was unlikely they would make a representation given the nature of the amendments but noted that this would not preclude future developments proposed by the WRWA from including residential uses. Any development that comes forward on WRWA land will be undertaken in partnership with a developer as the WRWA is not primarily a developer.</p> <p>The WRWA noted that sites such as Feathers Wharf and Cringle Dock have been subject to planning applications in the past which included residential and commercial uses.</p>
Neighbouring Authorities					
16	Hammersmith & Fulham	n/a	25.01.2024	N	<p>WBC provided an overview of the Local Plan review and the Reg18 responses received to date.</p> <p>LBHF considered it unlikely that there would be significant cross-boundary issues with the Local Plan Partial Review and noted they were positive about Wandsworth pursuing greater affordability.</p>
		09.05.2024	27.06.2024	N	<p>WBC provided an overview of the Local Plan review and the Reg18 responses received to date.</p> <p>LBHF also noted they were looking into student accommodation policy, and there was a discussion on applications for hotels.</p> <p>LBHF updated on their local plan preparations and noted they would be conducting their own DtC meetings later this year.</p>
		12.11.2024	16.01.2025	N	<p>LBW provided an update on the status of the Partial Review since the previous meeting.</p>

Ref.	Organisation	Correspondence sent	Meeting/ Response Date	Correspondence Received (Y/N)	Summary of Notes
					<p>LBHF asked about viability testing on small sites and LBW noted that small site scenarios had been tested and that the viability evidence was available online.</p> <p>LBHF asked if LBW had tested viability on council-owned sites. LBW noted that Wandsworth already have a council-led regeneration scheme underway and that most of the evidence looks at private sites.</p> <p>LBHF asked if Wandsworth had a criteria for how developers are expected to justify that land is unsuitable for conventional development – LBW noted that allocated sites were considered unsuitable where these have been allocated for residential uses.</p> <p>LBHF asked how discussions with the GLA had been in light of the proposals and the emerging London Plan. LBW noted that discussions with the GLA had been focussed on conformity with the London Plan.</p>
		24.04.2025	n/a	n/a	The Council contacted the London Borough of Hammersmith and Fulham on 24 th April 2025 inviting them to agree a Statement of Common Ground. The Statement of Common Ground will be added to the examination library when signed.
16	Kensington & Chelsea	n/a	18.01.2024	N	<p>WBC provided an overview of the Local Plan review and the Reg18 responses received to date.</p> <p>RBKC outlined their 70:30 split in favour of social rent with threshold of 650m² – this was not aligned with NPPF, and RBKC did not receive extensive objections including from the inspector. Noted that both authorities are looking to update Planning Obligations and Affordable Housing SPD's as part of respective plan reviews.</p>
		09.05.2024	11.06.2024	N	<p>LBW provided an update on the status of the Partial Review.</p> <p>PGT raised that their policy which did not support student accommodation policy was questioned by the inspector. PGT noted that it appeared that further evidence was required to support this stance as the evidence was mainly based on a statement from Imperial College stating that there was no additional need for student accommodation within the borough</p> <p>RBKC also noted that they attempted to adopt a similar small sites approach to that proposed by LBW and at examination stage this was questioned and amended to a unit-based approach rather than an area approach of 650sqm or less.</p>

Ref.	Organisation	Correspondence sent	Meeting/ Response Date	Correspondence Received (Y/N)	Summary of Notes
					<p>LBW provided an update on the Clapham Junction Masterplan works.</p> <p>RBKC noted they are awaiting the inspectors report following examination of their Local Plan review last year – this is likely to be following 4th July general election. RBKC also stated they were hoping to publish borough-wide design code and other SPD's following general election.</p> <p>RBKC confirmed they had no further comments to make on the LBW Partial Review.</p>
		12.11.2024	14.01.2025	N	<p>LBW provided an update on the status of the Partial Review since the previous meeting.</p> <p>RBKC asked about how the proposed 45% threshold will interact with the London Plan fast track threshold and whether the small sites policy will apply to net additional units or gross units from development. LBW noted that general conformity with the London Plan will depend on consultation feedback from the GLA, however the council views a local fast track as a way to complement the overall London Plan approach. LBW clarified that the small sites policy looks at gross units but adjustment could be considered if consultation feedback indicates this may be necessary.</p> <p>RBKC confirmed that the LBW Partial Review of the Local Plan is unlikely to impact or influence RBKC policy but it is useful to understand Wandsworth's approach.</p>
		24.04.2025	n/a	n/a	<p>The Council contacted the Royal Borough of Kensington and Chelsea on 24th April 2025 inviting them to agree a Statement of Common Ground. The Statement of Common Ground will be added to the examination library when signed.</p>
17	Kingston	n/a	23.01.2024	N	<p>WBC provided an overview of the Local Plan review and the Reg18 responses received to date.</p> <p>KuT to share their updated LHNA when available, and their emerging WPVA suggesting that small sites contribution is viable and supports 70:30 tenure split.</p>
		09.05.2024	10.06.2024	N	<p>LBW provided an update on Partial Review status.</p>

Ref.	Organisation	Correspondence sent	Meeting/ Response Date	Correspondence Received (Y/N)	Summary of Notes
					<p>KuT queried the production of a SoCG and LBW noted the approach to SoCG is yet to be defined.</p> <p>LBW provided an update on the Clapham Junction Masterplan.</p> <p>KuT noted there were no cross-boundary issues to raise at this stage.</p> <p>KuT stated they were also undertaking a local plan review and that their ambitions were similar to LBW.</p> <p>KuT noted that Wandsworth falls into the catchment for the KuT retail and leisure needs assessment but that the assessment shows KuT catchment area is decreasing and town centre spending has reduced.</p> <p>KuT raised their unmet housing need and noted that this could be covered in a SoCG later down the line.</p>
		n/a	01.10.2024	N	<p>KuT provided an update on their local plan process, and noted their Reg19 consultation which was due to begin in November 2024 is delayed due to the NPPF consultation.</p> <p>KuT provided an update on their housing need and target and expressed concern around whether the sites they have put forward will be considered deliverable under the revised NPPF.</p> <p>KuT provided an update on their employment and retail land, and stated they may have unmet need for retail and employment.</p> <p>KuT provided an update on their Gypsy and Traveller Pitches and noted they were struggling to find suitable sites to meet their need for Gypsy and Traveller pitches.</p> <p>KuT provided an update on their plans for future Duty to Co-operate collaboration and LBW expressed support for a more formal timetable of meetings or the establishment of a working group.</p> <p>LBW provided an update on the Local Plan Partial Review.</p>
		12.11.2024	15.01.2025	N	LBW provided an update on the Local Plan Partial Review.

Ref.	Organisation	Correspondence sent	Meeting/ Response Date	Correspondence Received (Y/N)	Summary of Notes
					<p>RBK asked if S106 will be used to collect contributions and what the approach would be in cases where small developers claim that affordable housing provision is not viable. LBW responded that S106 could be used in a proportional way using templated and that there will be a viability testing mechanism in place for smaller schemes. LBW clarified that Wandsworth have an in-house viability team and that larger schemes will undergo full viability testing.</p> <p>RBK noted that they have put their Local Plan consultation on hold and are now looking for a launch date in 2026. RBK also noted that they are conducting a review of their Green Belt policy and will look to engage with neighbouring authorities when they have appointed consultants.</p>
		24.04.2025	n/a	n/a	The Council contacted the Royal Borough of Kingston on 24 th April 2025 inviting them to agree a Statement of Common Ground. The Statement of Common Ground will be added to the examination library when signed.
18	Lambeth		20.02.2024		<p>WBC provided an overview of the Local Plan review and the Reg18 responses received to date.</p> <p>WBC do not foresee any cross-boundary implications with the single issue review.</p>
		09.05.2024	6.06.2024	N	<p>LBW provided an update on Partial Review status.</p> <p>LBL noted they were supportive of efforts to maximise affordable housing delivery.</p> <p>LBL noted they were also looking to maximise affordable housing delivery and expect to undertake a similar review to Wandsworth.</p> <p>LBW gave an update on the Clapham Junction Masterplan and LBL noted that they are undertaking a similar project with Waterloo railway station.</p>
		12.11.2024	16.01.2025	N	<p>LBW provided an update on Partial Review status.</p> <p>Lambeth officers asked if there was a lower threshold on the small sites policy and LBW clarified there was not and that this would be calculated on a gross basis.</p>

Ref.	Organisation	Correspondence sent	Meeting/ Response Date	Correspondence Received (Y/N)	Summary of Notes
					<p>Lambeth asked how the Student Accommodation Policy was worded to set out that Wandsworth would not accept Student Housing on sites suitable for conventional housing. LBW noted that the wording was now available online to view as part of the consultation and that there had been a downturn in the market for conventional housing development in favour of Student Housing in Wandsworth.</p> <p>Lambeth officers noted the implications of the affordable housing policy and LBW noted that in the drafting process they had looked at examples from elsewhere. LBW noted that Lambeth were invited to make representations on the proposals and emphasised that the Partial Review does not propose any changes to site allocations but rather looks to maximise the delivery of affordable housing.</p> <p>Lambeth officers asked a question about how LBW organises their consultation database. LBW officers noted that Wandsworth use the Objective platform which holds contact details. Consultees are added to the database when they make representations unless they opt out.</p>
		Comment Received as part of Reg 19 consultation	n/a	Y	<p><i>The London Borough of Lambeth welcomes the opportunity to respond to the Wandsworth Local Plan Partial Review. The two boroughs have worked closely together in recent years to discuss common strategic matters and prepare Statements of Common Ground, in line with the Duty to Cooperate, and are jointly committed to delivering more affordable housing in the Vauxhall, Nine Elms and Battersea Opportunity Area. We look forward to continuing this good working relationship as the Wandsworth Local Plan progresses and as we begin to review our own Lambeth Local Plan. We support the aims of the revised policies in the consultation draft to better reflect identified housing need in the borough, and to increase affordable housing delivery on suitable sites throughout Wandsworth. We have no specific comments or changes to make on individual policies, and we do not think that the revised policies raise any strategic issues between the two boroughs.</i></p>
		24.04.2025	n/a	n/a	<p>The Council contacted the London Borough of Lambeth on 24th April 2025 inviting them to agree a Statement of Common Ground. The Statement of Common Ground will be added to the examination library when signed.</p>
19	Merton	n/a	24.02.2024	N	<p>WBC provided an overview of the Local Plan review and the Reg18 responses received to date.</p> <p>LBM advised that Merton's emerging policy similarly requires 70% low-cost rent, 30% intermediate tenures, with a 50% strategic target</p>

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		09.05.2024	06.06.2024	N	<p>LBW provided an update on Partial Review status.</p> <p>LBM are pursuing a similar affordable housing policy approach. LBM have a viability-based approach in policy but are working towards a price per unit approach to avoid the need for viability testing to simplify the process.</p> <p>LBW provided an update on the Clapham Junction Masterplan.</p> <p>LBM updated on their local plan – this was submitted in December 2021 and still in the examination period and waiting for the inspectors reports. Reasoning for this is a high number of queries from examiners and an ongoing struggle to meet Merton housing targets in addition to unmet needs from covid pandemic.</p>
		12.11.2024	13.01.2025	N	<p>LBW provided an update on the Partial Review status.</p> <p>LBM officers noted that they support the principle of the proposals set out in the Partial Review and will view the consultation documents to provide a formal representation.</p> <p>LBM officers raised questions on the GLA's perspective of the proposed local fast-track route and the evidence LBW had to support the proposals. LBW noted that the GLA has no objection to the small sites contributions and housing mix proposals but is hesitant with regards to the proposed local fast-track threshold. LBW clarified that the evidence base includes a whole-plan viability assessment and a background paper. The viability modelling shows that 80% of sites over 10 units should be able to meet the 45% threshold.</p> <p>LBM asked whether the evidence base includes local definitions of household income thresholds and LBW clarified that the definitions are intended to align with London Plan assumptions.</p>
		Comment Received as part of Reg 19 consultation	13.02.2025	Y	<p>Merton supports Wandsworth's proposed objective to strengthen the Local Plan policy requirement for new housing development in the borough as it is considered that this will help more effectively contribute towards addressing Wandsworth's identified local needs and the London Plan strategic target for 50% of all homes delivered across London to be genuinely affordable.</p> <p>Merton supports:</p> <ol style="list-style-type: none"> 1) Proposed fast track threshold requirements set out in Strategic Policy LP23 Affordable Housing.

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					<p>2) Proposed changes to policies LP24 Housing Mix; LP28 Purpose-Built Student Accommodation; LP29 Housing with Shared Facilities; LP30 Build to Rent and LP31 Specialist Housing for Vulnerable People and for Older People.</p> <p>The proposed changes to these policies are supported by an evidence base, the robustness of which will be tested via the Local Plan Examination.</p>
		24.04.2025	n/a	n/a	The Council contacted the London Borough of Merton on 24 th April 2025 inviting them to agree a Statement of Common Ground. The Statement of Common Ground will be added to the examination library when signed.
20	Richmond upon Thames	n/a	n/a	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.
		n/a	11.03.2025	Y	<p><i>Dear colleagues leading on the Wandsworth Local Plan,</i></p> <p><i>I am emailing in connection with the recent consultation on the Publication version of Wandsworth Borough Council's Local Plan Partial Review.</i></p> <p><i>While we are working as part of the Better Services Partnership, at key milestones we have considered and documented the duty to cooperate discussions between Wandsworth and Richmond, building on strategic and cross-boundary issues that have been identified in the past. To inform the emerging Richmond Local Plan (currently under Examination), a Statement of Common Ground was published in March 2024 which did not identify any outstanding comments in terms of strategic, cross-boundary issues between the boroughs.</i></p> <p><i>In relation to the adopted Wandsworth Local Plan, we did not identify any strategic, cross-boundary concerns as issues to raise at that time. Given the nature of this partial review, there continue to be no strategic, cross-boundary issues to raise.</i></p> <p><i>There are of course shared aspirations between the authorities in relation to maximising delivery of affordable housing. Detailed policy approaches such as towards housing mix do not raise any strategic matters. There are some aspects in the partial review which may create a consistent approach across the boroughs, for example the proposed tenure split of 70/30 and to require financial contributions towards affordable homes from small sites.</i></p>

Ref.	Organisation	Correspondence sent	Meeting/ Response Date	Correspondence Received (Y/N)	Summary of Notes
					<i>I look forward to any further discussions in relation to a Statement of Common Ground. As signature is at officer level, we can turn around relatively quickly at the point you require, and we have already informally informed the Chair of the Council's Environment, Sustainability, Culture and Sports Committee of our discussions.</i>
21	Westminster	n/a	13.02.2024	n/a	<p>WBC provided an overview of the Local Plan review and the Reg18 responses received to date.</p> <p>WCC also undertaking Partial Review of their city plan focussed on three main elements (review affordable housing policy, introduce four new allocations and make changes to sustainability requirements).</p> <p>WCC shortly going to Reg 19 (mid-March) on their review – new affordable housing has a 70:30 split in favour of social rent and also added in small sites (payments in lieu). Recognised current economic climate not great.</p> <p>WCC looking to challenge London Plan portfolio approach and may look to take a cascade method instead where alternative Westminster sites must be used first.</p>
		09.05.2024	12.06.2024	N	<p>LBW provided an update on Partial Review status.</p> <p>WCC is progressing with a Partial Review focussed on retrofitting, affordable housing and site allocations. Their most significant opposition is from developers regarding their retrofit-first policy. They are also reviewing concerns around viability and WCC are considering a sliding-scale approach for small sites affordable housing provision, and this was the industry preference.</p> <p>In terms of publishing their updated policy, WCC are presenting this as a new policy, combined with minor updates as tracked changes but much of the old text will remain.</p> <p>LBW provided an update on the Clapham Junction Masterplan and it was agreed that it is unlikely for there to be any impact on potential views and townscapes.</p> <p>WBC queried the future of the Grosvenor sidings site which is allocated in Westminster review but this was uncertain.</p>

Ref.	Organisation	Correspondence sent	Meeting/ Response Date	Correspondence Received (Y/N)	Summary of Notes
		12.11.2024	24.01.2025	N	LBW provided an update on Partial Review status. LBW had no comments to make on the proposals.
		24.04.2025	n/a	n/a	The Council contacted the City of Westminster on 24 th April 2025 inviting them to agree a Statement of Common Ground. The Statement of Common Ground will be added to the examination library when signed.

Appendix B - Schedule of 'Duty to Co-operate' meetings held with neighbouring authorities and other/prescribed bodies.

Neighbouring Authorities	
London Borough of Hammersmith and Fulham	25 th January 2024 27 th June 2024 16 th January 2025
Royal Borough of Kensington and Chelsea	18 th January 2024 11 th June 2024 14 th January 2025
Royal Borough of Kingston	23 rd January 2024 10 th June 2024 1 st October 2024 15 th January 2025
London Borough of Lambeth	20 th February 2024 6 th June 2024 16 th January 2025
London Borough of Merton	24 th January 2024 6 th June 2024 13 th January 2025
Westminster City Council	13 th February 2024 12 th June 2024 24 th January 2025
Prescribed and Other Bodies	
Greater London Authority	23 rd January 2024 7 th June 2024 18 th September 2024 10 th December 2024

	12 th February 2025
Marine Management Organisation	12 th June 2024 14 th January 2025
Natural England	6 th June 2024 24 th October 2024
Port of London Authority	7 th June 2024 13 th January 2025
Western Riverside Waste Authority (WRWA)	15 th January 2025
National Highways	13 th January 2025