

WANDSWORTH

Duty to Co-operate Statement

Local Plan Publication (Regulation 19) Version
January 2022



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1. Introduction

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

2. Context

Legal and Policy Context

1. The 'Duty to Cooperate' is a statutory duty for Local Planning Authorities and is a requirement of the Localism Act 2011 and the National Planning Policy Framework (NPPF).
2. 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

3. The NPPF states that Local Planning Authorities are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries and this should clearly be reflected in individual Local Plans.
4. Paragraph 24–26 of the NPPF set out where collaboration amongst local communities and relevant bodies is expected and gives further guidance on planning strategically across local boundaries. It also requires demonstration that the plan is deliverable and is based on effective joint working on cross boundary strategic priorities. This is also

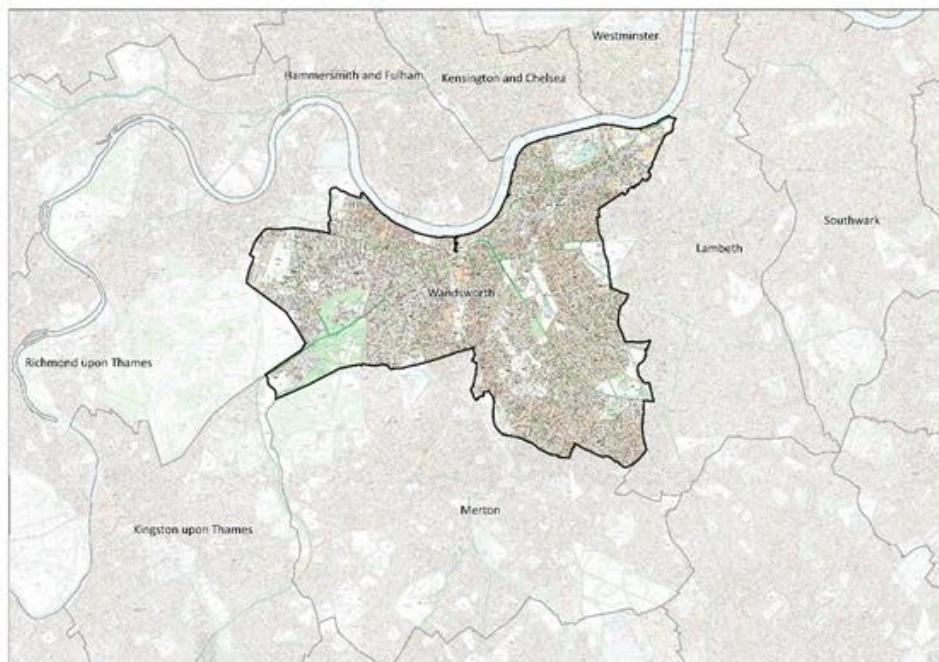
reinforced in the PPG, which sets out what is required and gives further guidance on the Duty to Cooperate.

5. Paragraph 27 of the NPPF has also introduced a requirement to produce Statements of Common Ground (SoCG) throughout the plan-making process to document where effective cooperation is (and is not) taking place as plans are drawn up and taken through the statutory process to adoption. More information can be found in Section 6.

Strategic Context

6. The NPPF and PPG highlights that LPA's have a Duty to Cooperate on planning issues that cross administrative boundaries.
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**.
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



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

Figure 1: Neighbouring planning authorities' Local Plan revision status

Authority	Local Plan Status
London Borough of Lambeth	Adopted September 2021
London Borough of Kensington and Chelsea	In 2020 the Council started a New Local Plan review and is currently consulting on the issues and options stage. (July –October 2021).
Kingston Upon Thames	Further Consultation Stage July –September 2021
Merton	Regulation 19 Stage consultation July – September 2021
Richmond Upon Thames	Issues and Options Consultation February – April 2020. Pre-publication consultation on the draft Plan and SA (Regulation 18) December 2021 - February 2022
Hammersmith and Fulham	Local Plan adopted February 2018
Westminster	Adopted April 2021

London Context

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

12. Wandsworth shares a land boundary with the boroughs of Lambeth, Merton, Kingston upon Thames, Richmond whilst the boroughs of Hammersmith and Fulham, Kensington and Chelsea and Westminster are located across the River Thames to the south. Wandsworth has maintained regular and open communication with neighbouring boroughs throughout all stages of Local Plan development, including email communication, and conference/video calls with officers from neighbouring boroughs (individually and as groups). All neighbouring boroughs were invited to comment on the draft Local Plan at the Issues and Regulation 18 Stages. 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
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

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 and brings together the public, private, voluntary and community sectors to work together to improve the quality of life for all who live in, work in, and visit Wandsworth.
 - Western Riverside Waste Authority (WRWA) comprises four boroughs in the 'Western Riverside' area of London. It is responsible for disposal of household waste. The Western Riverside waste planning authorities of Wandsworth, Lambeth, Kensington & Chelsea, Hammersmith & Fulham and the Old Oak and Park Royal Development Corporation (OPDC) have been working together on waste planning since 2015.
 - The Vauxhall Nine Elms Battersea Strategy Board was established in 2009 to provide strategic leadership for the implementation of the Opportunity Area Planning Framework for Vauxhall Nine Elms Battersea (now known as Nine Elms Vauxhall). It is co-chaired by the leaders of Wandsworth and Lambeth councils and meets bi-monthly, as do subject-specific working groups. It is attended by major landowners, developers and officers of the public authorities.
 - Chamber of Commerce.

Wandsworth Joint working

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.

- Wandsworth Council officers regularly attend meetings and actively contribute to the Association of London Borough Planning Officers, which provides a very useful platform for engaging with other London Boroughs on planning matters.
 - There are also regular meetings with specific stakeholders and Duty to Co-operate bodies, for example, Council officers regularly meet with health bodies, including Public Health, Wandsworth Clinical Commissioning Group, NHS England, NHS Properties Services and the London Healthy Urban Development Unit, to discuss issues relating to the emerging Local Plan, the south-west London Sustainability & Transformation Plan, the Joint Strategi Needs Assessment, and other initiatives.
 - Public Practice engagement events, which involve officers from planning authorities within and outside London and provide a format for the sharing of good practice.
16. Since the 1 October 2016, Richmond and Wandsworth have had a shared staffing arrangement in place. As a result, planning officers within Richmond and Wandsworth work closely, sharing the same Spatial Planning and Design Team Manager. Joint team meetings are held throughout the year where DtC issues are also discussed.

Prescribed bodies

17. Prescribes bodies are set out in Part 2 of the Town & Country Planning (Local Planning) (England) Regulations 2012. These are:
- The Environment Agency
 - The Historic Buildings and Monuments Commission for England (known as Historic England)
 - Natural England
 - The Mayor of London
 - The Civil Aviation Authority
 - The Homes and Communities Agency
 - Each Primary Care Trust established under section 18 of the National Health Service Act 2006(2) or continued in existence by virtue of that section
 - Each Integrated Transport Authority
 - Each highway authority within the meaning of section 1 of the Highways Act 1980(6) (including the Secretary of State, where the Secretary of State is the highways authority)
 - The Marine Management Organisation

3. Wandsworth Local Plan Review

Stage 1 Issues and Options Stage

1. The Council started a review of its current Local Plan in 2018 and between December 2018 and February 2019, undertook a consultation on the scope for the updating the adopted Local Plan in the form of an 'issues document'. This was an additional stage of consultation by the Council (not prescribed by the Town and Country Planning (Local Planning) (England) Regulations 2012) to provide the opportunity for early engagement with the borough's communities, businesses, key stakeholders, neighbouring local authorities and statutory bodies.

Stage 2 Preferred Options Stage (Regulation 18)

2. Following the initial consultation, the Council prepared a draft Plan setting out proposed planning policies informed by the main issues raised at the issues and options stage and supported by an up-to-date evidence base. A second round of public consultation was held between 4 January 2021 and 1 March 2021. The Council consulted with a range of stakeholders, including both statutory and non-statutory bodies, as well as local communities.

Stage 3 Publication Stage (Regulation 19)

3. The new Local Plan will form part of the development plan for the borough. Following the Regulation 18 consultation, the Council made changes to the Plan (taking into account comments received on the consultation draft Local Plan, together with any additional/refreshed evidence base work where appropriate). This produced the Regulation 19 version of the Plan that the Council intends to submit to the Secretary of State for Examination. 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.
4. 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.
5. The latest version of the Council's Local Development Scheme, available on the Council's website, sets out the timetable for production of Wandsworth's Local Plan documents. The Local Plan is subject to three stages of public consultation:

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

6. Consultation and engagement on the Local Plan is being carried out in accordance with the measures sets out in Wandsworth's [Statement of Community Involvement](#) that was adopted by the Council in 2019.

7. With regards to the emerging Wandsworth Local Plan, 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.
8. Read alongside current, or future, Statement of Common Grounds (SoCG), these documents will demonstrate progress made on matters between the Council and stakeholders.
9. As evidence of the Local Plan's positive preparation, this DtC Statement will be updated and included as part of supporting documentation that accompanies the submission version of the Local Plan document. It will assist the Planning Inspector in determining that the Council has fulfilled its Duty to Cooperate responsibilities.

4. Pre-Publication Consultation (Regulation 18)

1. The Council reviewed and updated the existing policies as well as the site-specific proposals in line with the originally outlined rationale, scope and intention for review, also taking account of the consultation responses and outcomes from Duty to Cooperate 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 4 January until 1 March 2021.
2. The Council received consultation responses to the Pre-Publication consultation from the following Duty to Co-operate bodies:
 - Highways England
 - Historic England
 - Natural England
 - NHS Property Services Ltd
 - The Mayor of London
 - Sport England
 - Marine Management Organisation
 - Port of London Authority
 - Thames Water
 - NHS HUDU
 - Environment Agency
 - London Underground
 - National Grid
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 to the draft Local Plan. Some comments raised have also been considered in amendments to the Sustainability Appraisal.
4. All of the consultation responses received were published within the [Statement of Consultation Report, January 2022](#), which also sets out the Council's response to the comments raised in [Appendix 5](#).

5. On 20 July 2021, Government published a revised NPPF, following an earlier consultation. Regard has been had to whether the revised NPPF would now require any amendments to be made to the policies to be contained in the Regulation 19 'Publication Version' Local Plan.

5. Duty to Cooperate Outcomes on Strategic Matters

1. Alongside formal notification of the public consultation on the Pre-Publication Local Plan (Regulation 18), which was 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, affording the opportunity to provide a more bespoke update on relevant changes within the draft Local Plan, as well as to consider potential strategic matters, against those identified in paragraph 20 of the NPPF, and cross-boundary issues.
2. The organisations that the invitation was extended to is recorded in Appendix A, and minutes of the meetings that were held is recorded in Appendix B.
3. 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. Statement(s) of Common Ground

1. Paragraph 27 of the NPPF introduced (as part of the DtC process) a requirement for strategic policy making authorities to, 'prepare and maintain one or more statements of common ground (SoCG) documenting the cross-boundary matters being addressed and progress in cooperating to address these.' This is required 'in order to demonstrate effective and on-going joint working.' The purpose of the SoCG is to document cross-boundary matters and progress in cooperating to address them. It demonstrates that the Local Plan is based on effective and ongoing cooperation and that LPAs have sought to produce strategies that as far as possible are based on agreements with other authorities. The SoCG should be produced, published and kept up to date by the signatory authorities as an accessible and public record of where agreements have or have not been reached on cross boundary strategic issues.
2. The Council has commenced a process of preparing SoCG with neighbouring authorities and will, where necessary and where directed, undertake additional SoCG with any other bodies following the consultation on the Publication Local Plan (Regulation 19), when the position with respect to agreed and unresolved issues will be clearer.

7. Engagement with Waste Planning Authorities

1. LBW has published a Waste Technical Study (Wandsworth Local Plan Review: Waste Evidence Base (2020)). The conclusion of the Waste Technical Study is that waste need, including the Borough's apportionment target, will be met within the borough

through capacity at existing sites and directing new waste facilities to safeguarded industrial areas to make up the shortfall.

2. A Duty to Cooperate Report on Waste Exports was finalised in May 2021, and is available on the Council's website. The report provides an audit and analysis of the issues raised during the Duty to Cooperate engagement on waste exports between January and March 2021, which was undertaken alongside Wandsworth's consultation on the draft Publication Local Plan (Regulation 18). Wandsworth has identified sixteen waste planning authorities (or groups of WPAs) who receive of 'strategic' amounts of waste exports from the Borough (i.e. an amount of waste over certain thresholds which have been agreed by waste planning authorities across the wider south east). Wandsworth has engaged with each of these authorities, or groups of authorities, to establish if there are any planning reasons why similar waste exports from the Borough cannot continue over the plan period.
3. As an outcome of this ongoing process, Wandsworth will work towards preparing Statements of Common Ground with each of the WPAs who consider waste exported from Wandsworth to their area to be a strategic issue. These will be published as independent SoCGs from those addressing other strategic issues (where appropriate), and will include neighbouring Merton and Hammersmith and Fulham, alongside:
 - London Borough of Havering
 - Hertfordshire County Council
 - Kent County Council
 - Medway Council
 - Old Oak and Park Royal Development Corporation
 - Surrey Country Council
 - Thurrock Council

8. Conclusion

1. During the revision of the Draft Local Plan, the Council has engaged very actively with its stakeholders and partners and discussed with them all strategic matters. The Draft Local Plan published under Regulation 19 (Town and Country Planning Act (Local Planning) (England) Regulations 2012) reflects the views and comments received during the engagement and cooperation process.
2. This report, the Consultation Statement and, once prepared, the Statements of Common Ground demonstrate how the council has complied with its Duty to Cooperate and will be used during the Examination in Public to show that the Draft Local Plan 2023-38 is based on effective joint working across local authority boundaries. The Duty to Cooperate Statement will be updated prior to submission of the Local Plan to take account of new meetings and ongoing engagement made under the upcoming consultation with key stakeholders and partners.

Appendix A

Schedule of meetings with statutory stakeholders (pre-Regulation 19)

	Organisation	Correspondence sent	Meetings/events	Correspondence Received (Y/N)	Notes
Prescribed Bodies					
1	Environment Agency	DTC meeting email invite – 21/12/2020 Regulation 18 email 4/1/21	5/4/19 Meeting with EA and WBC officers. (Wandsworth Town Hall)	Y	
2	Historic England	DTC meeting email invite – 21/12/2020 Regulation 18 email 4/1/21	4/2/21 Meeting (via MS Teams) on Reg 18 & DTC. Historic England and LBW officers. 25/5/21 Meeting (via MS Teams) Discussing tall buildings policy (GLA officers also present)	Y	
3	Natural England	DTC meeting email invite – 21/12/20 Regulation 18 email 4/1/21		Y	

4	The Civil Aviation Authority	Regulation 18 email 4/1/21		N	The Council considers that there are no strategic issues of relevance to discuss with the Civil Aviation Authority. The CAA is a statutory consultee and is consulted on all the Council's planning policy documents, including the Local Plan; however, it was not thought to be necessary to hold specific duty to co-operate meetings or other engagement activities beyond the normal statutory consultation procedures with the CAA.
5	Homes England (previously HCA)	Regulation 18 email 4/1/21		N	
6	Clinical Commissioning Groups (CCGs) – Wandsworth Borough Estates Group	Regulation 18 email 4/1/21	WBC gave presentation on Local Plan at Wandsworth Borough Estates Workshop Monday 2 /12/2019, 1.30- 4pm St George's Hospital, Tooting. 23/6/2020 Presentation at Wandsworth borough Estates	Y	

			<p>Meeting – Reg 18 Local Plan and Site allocations (followed up with email correspondence confirming information on NHS Site Allocations 01/7/2020)</p> <p>August – September 2020 Email correspondence with NHS St Georges Hospital Estate Strategy regarding St Georges Hospital Estate Strategy and Site Allocation.</p> <p>WW Health and Wellbeing Board seminars - 20/02/2020 – Health and Wellbeing in the Local Plan. Follow up 13/05/2020 (informing the Reg 18) Local Plan future Direction Wednesday 16 October 2019 and March 2019</p>		
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7	Transport for London	DTC meeting email invite – 21/12/20 Regulation 18 email 4/1/21	30/4/19 Meeting with WBC and Cross rail 2 officers (55 Broadway, London) 5/2/21 Meeting (via MS Teams) on Reg 18 & DTC. (TfL and LBW).	Y	
8	Highways England (formerly Highways Agency)	Regulation 18 email 4/1/21		Y	While the Council considers Highways England to be an important duty to cooperate body, due to the nature of the development sites in the borough, which have very limited impact upon the areas under the remit of Highways England, the Council has not approached them specifically in relation to the Duty to Co-operate. However, Highways England was consulted on all public consultations relating to the Local Plan.
9	The Marine Management Authority	Regulation 18 email 4/1/21	MMO marine planning event - 18/2/20, (Nobel House, Westminster.)	Y	
10	The Office of Rail Regulation	Regulation 18 email 4/1/21		N	The Council considered that there were no strategic issues of relevance to discuss with

					the Office of the Rail Regulation, which is a statutory consultee and is consulted on all the Council's planning policy documents, including the Local Plan; however, it was not thought to be necessary to hold specific duty to cooperate meetings or other engagement activities beyond the normal statutory consultation procedures with this Office.
11	Greater London Authority	DTC meeting email invite – 21/12/20 Regulation 18 email 4/1/21	2/12/19 Employment land stakeholder consultation workshop (Wandsworth Town Hall) 26/02/20 Climate emergency borough workshop (City Hall) 22/2/21 Meeting (via MS Teams) with GLA and WBC officers. DTC and Reg 18 Plan. 25/05/21 Meeting (via MS Teams)	Y	

			Discussing tall buildings policy (Historic England also present) 26/05/21 Meeting (via MS Teams) Discussing industry and waste policy		
12	Integrated Transport Authority	Regulation 18 email 4/1/21		Y	The Council is the Highways Authority for the area; the Council's transport planners have been involved in the preparation of the Local Plan including site allocations
Additional Bodies					
13	Port of London Authority	Regulation 18 email 4/1/21	26/2/19 DTC meeting with WBC and PLA officers (Wandsworth Town Hall)	Y	
14	Local Enterprise Partnership	Regulation 18 email 4/1/21		N	
Neighbouring Authorities					
15	Hammersmith & Fulham	DTC meeting email invite – 18/12/20 and 9/2/21	25/2/21 Meeting (via MS Teams) with WBC officers. DTC and Reg 18 Plan.	Y	

		Regulation 18 email 4/1/21			
16	Kensington & Chelsea	DTC meeting email invite – 18/12/20 and 9/2/21 Regulation 18 email 4/1/21	24/2/21 Meeting (via MS Teams) with WBC officers. DTC and Reg 18 Plan.	Y	
17	Kingston upon Thames	DTC meeting email invite – 18/12/20 Regulation 18 email 4/1/21	27/2/21 Meeting (via MS Teams) with WBC officers. DTC and Reg 18 Plan.	Y	
18	Lambeth	DTC meeting email invite – 18/12/20 Regulation 18 email 4/1/21	25/2/21 Meeting (via MS Teams) with WBC officers. DTC and Reg 18 Plan.	Y	
19	Merton	DTC meeting email invite – 18/12/20 Regulation 18 email 4/1/21	22/2/21 Meeting (via MS Teams) with WBC officers. DTC and Reg 18 Plan.	Y	
20	Richmond upon Thames	Regulation 18 email 4/1/21		Y	Richmond and Wandsworth have had a shared staffing arrangement in place. As a result, planning officers within

					Richmond and Wandsworth work closely, sharing the same Spatial Planning and Design Team Manager. Joint team meetings are held throughout the year where DtC issues are also discussed.
21	Westminster	DTC meeting email invite – 18/12/20 Regulation 18 email 4/1/21	15/1/21 Meeting (via MS Teams) with WBC officers. DTC and Reg 18 Plan.	Y	

APPENDIX B

Minutes of 'Duty to Cooperate' meetings held with neighbouring authorities and other/prescribed bodies

Neighbouring authorities

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

Prescribed and other bodies

- Greater London Authority, 22.02.21
- Historic England, 04.02.21
- Transport for London, 05.02.21

Meeting Minutes

Partner
LB Hammersmith & Fulham

Topic
Duty to Cooperate

Date
Thursday, 25 February 2021

Location
MS Teams

Time
14:00 – 16:00

Meeting Attendees

Name	Organisation
Robert Wellburn	LB Wandsworth
Emil Ancewicz	LB Wandsworth
Eoghan McConville	LB Wandsworth
David Gawthorpe	LB Hammersmith & Fulham
Sarah Dixey	LB Hammersmith & Fulham

Agenda Items

1. Introductions
 2. Local Plan update
- **LBW** provided update on Regulation 18 'Pre-Publication' draft Local Plan, which is a full review. For more detailed information, please see [the Council's website](#). Points of note:
 - The borough has commissioned an [Urban Design Study](#) for the first time as part of the Local Plan evidence base. This has been developed by Arup.
 - Most evidence was collected prior to the COVID-19 pandemic. While reference to this is made within the Plan, generally it is considered too early to adapt the approach to accommodate the impacts of this. The longer-term impact will be kept under review, including to assess whether / when evidence-based documents need updating.
 - Public consultation on the Reg 18 draft LP runs until 1 March 2021. An interactive map is [available](#). Alongside the 'formal consultation', we have been hosting events with 'seldom heard' groups, including young adults and estate residents. This has been led by a Public Practice Associate with an expertise in community engagement.
 - The ambition is to get the Regulation 19 version to the September committee, and therefore to consult on this in the autumn 2021. The Plan will be submitted to PINS in spring 2022, and adoption hoped for in spring/summer 2023. The Plan seeks therefore to proceed ahead of potential reforms identified within the White Paper, however we will retain a flexible approach, and will most likely commit to undertaking early reviews if and where necessary (as raised by Inspector).
 - Two SPDs have been identified as emerging from / associated with the Plan:
 - An area-based SPD for the Wandle Delta. The latter was published in the February 2021 committee, and is available for [public consultation](#) from 15 February to 21 March 2021. Some of the content for the site allocations and the area strategy for Wandsworth Town will be amended to fit in with the objectives of this document.
 - A Small Sites Development SPD will be developed in due course.
 - **LBHF** are generally supportive of the approach taken in the **LBW** draft Local Plan, and consider that the emphasis on placemaking will position it well with respect to potential reform of the planning system (as identified in the White Paper).
 - **LBHF** provided an update on the Local Plan. Points of note:
 - There is no intention to begin a review of the Local Plan ahead of potential forthcoming reforms, and so will be guided by these.

- Undertaking various evidence base and SPD work in the meantime, including:
 - Affordable Workspace SPD, which seeks to apply an area based approach to provision (types of business, geographical distribution, sensitivity to pandemic), as well as information on employment and skills to support the work of DM officers.
 - Railway Arches SPD
 - Work on Hammersmith Town Centre. A masterplan has been progressed by Grimshaws with a view to developing an SPD. This is however now likely to be taken forward as an investment plan / development brochure focusing on economic recovery from the pandemic. A key aspect is the scope of bury the flyover, the reconfiguration of the gyratory, and improvements to placemaking.
 - Small Sites evidence, led by Allies & Morrison, which is focused on capacity, characterisation, and a design code. This work is due to be completed towards the end of March.

3. Duty to Cooperate – strategic / cross-boundary issues:

a. Area strategies & site allocations

- **LBW:** The Draft Local Plan seeks to concentrate growth in the centres identified in the Plan's nine Area Strategies, which are collectively expected to deliver approximately ¾ of the 10-year housing supply. Growth will be particularly targeted to the VNEB OA (Nine Elms), Wandsworth Town and the Wandle Delta, and Clapham Junction (including the York Road / Winstanley Estate), and consequently these are the focus of our site allocations / masterplanning.
- **LBW:** The Area Strategies that are likely to be most pertinent for LBHF are:
 - Wandsworth Town (including the Wandle Delta), which comprises a concentration of site allocations -many of which are taken forward from the LPEID. There is a significant growth agenda in the area to the north of the town centre, as well as intentions to redevelop the Town Hall site and – further reaching – the Southside Shopping Centre. [Summary here](#) and further detail set out within the [Wandle Delta SPD](#) (consultation until 21/3/21).
 - Putney, which includes 5 site allocations focused along Putney High Street. [Summary here](#).
 - Wandsworth's Riverside, which is an overarching strategy focusing on the borough's relationship with the Thames. A cluster of site allocation are included in the Lombard Road / York Road area, although many of these are in pre-application discussions or applications have been received.
- **LBHF:** Supportive of the inclusion of site allocations within the draft Local Plan; helpful for this to be read as a cohesive document.

b. Housing, including gypsies and travellers

- **LBW:** The Local Plan will aim to deliver at least 1,950 homes per year in line with the housing requirements set out in the London Plan. This is 70% more than the 2011 targets set out in the London Plan, however it is less than housing need as identified within the housing needs assessment. Using the standard methodology adopted in 2018, we would have a housing need figure of over 2,500 dwellings per year, and using the updated methodology from 2020 would provide a figure of 3,425 dwellings per year.
- **LBW:** In accordance with the NPPF, a comprehensive review of land and sites available for development (including large, small and windfall sites) was undertaken. This identified sufficient capacity to meet and even slightly exceed the housing requirements set out in the London Plan for years 1-10 of the Local Plan period, however there is a shortfall identified over the 15-year period. The draft Local Plan has a positive approach to housing delivery on small sites, an emphasis on a design led approach to optimise housing capacity, and opportunities to create homes through estate regeneration.
- **LBHF:** Will face an increase in their housing target (from approximately 1000 to 1600 per annum), however like LBW has a good supply of larger sites and therefore a relatively healthy trajectory. Further work will be required in order to make up the target, including based on recent completions, and it is hoped that the small sites work will assist with this.
- Neither borough is seeking assistance with their housing requirements.
- **LBW:** The Local Housing Need Assessment (LHNA) identifies a net need for 2,327 affordable rented and 1,248 affordable home ownership dwellings per annum to be provided over the plan period. The level of need is significant, and for that reason the proposed affordable housing policy (LP25) sets the aspiration to secure 50% of all new homes to be affordable, in line with the intent of the emerging London Plan. This will be informed further by the outcomes of a Whole Local Plan Viability Assessment.

- **LBHF:** Noted that viability evidence produced specifically for their affordable housing policy demonstrated that certain areas of the borough were able to meet the 50% target, and this was therefore accepted by the Inspector at examination.
- **LBW:** The Council has a long-established Gypsy and Traveller site in Earlsfield, which currently accommodates 11 residential pitches, one of which is vacant. The Gypsy and Traveller Accommodation Needs Assessment (2019), which was conducted in-house, found that there is no evidenced requirement or need for additional pitches to be provided on the existing site or elsewhere in the borough. If demand exceeds supply in the future, the Council will explore options to identify an additional site.

c. *Historic environment & tall buildings*

- **LBW:** Commissioned the [Urban Design Study \(UDS\)](#) to develop a better understanding of the values, character and sensitivity of different parts of the borough. The study identified 7 high level places and 21-character areas in the borough. This guidance has been embedded in the area strategies for different parts of the borough. The study accounted for existing buildings (or permissions), including where these are not considered successful. In such cases, the study recommended that existing tall buildings should not be seen as justification for the creation of further landmark tall buildings or attract the development of a tall building cluster. The UDS recommended revising the currently adopted tall buildings policy. The draft policy identifies a number of local definitions of “tall” (informed by the local prevailing height) and identifies broad locations across the borough where tall buildings may be appropriate. There are three types of tall building zones: opportunity for tall building clusters, opportunities for tall buildings in town centres, opportunity for tall buildings within a local context. Maximum heights are not set.
- **LBW:** A substantial part of the Wandsworth’s Riverside has been identified as having ‘opportunities for tall building clusters and/or landmarks’ or ‘Opportunities for tall buildings within town centres and along strategic routes’. Development proposals involving tall buildings will be assessed against the tall buildings criteria set out in the emerging London Plan, and additional Wandsworth-specific criteria listed in policy LP4 Tall Buildings. Although, tall buildings in these locations are likely to impact on views from Hammersmith & Fulham, it is not considered that the impact would be unacceptable given that proposals will need to comply with the criteria set out in the policy.
- **LBHF:** Will consider the Urban Design Study and respond as necessary, most likely at the Reg 19 consultation. LBW are happy to discuss any considerations in advance of this.
- **LBW:** The policy on the historic environment seeks to preserve the significance of the historic environment and is considered unlikely to cause any cross-boundary issues.

d. *Employment land*

- **LBW:** The updated [Employment Land and Premises Study \(2020\)](#) suggests there is demand for office floorspace (22,500 sqm) and industrial land (8.6ha) in excess of supply. The Draft Local Plan therefore takes a protective approach, including resisting co-location within the LSIA (Local equivalent of LSIS) as offered by E7 of the London Plan. While the impact of the pandemic is recognised, the Plan commits to analysis of data once this has been gathered and generally does not seek to predict outcomes.
- **LBW:** Office development is, however, promoted through co-location with intensified industrial uses in part of the Battersea, Queenstown Road SIL, as part of an initiative to create [Battersea Design and Tech Quarter](#). This is a strategic decision focused on creating a tech and creative industries hub which seeks to build on investment in the Battersea Power Station development, including occupation by companies such as Apple and the Northern Line Extension. The Local Plan proposes a greater affordable workspace contribution within this area (and in the VNEB OA), of a 50% reduction below comparable market rents. This seeks to establish parity with the approach in Lambeth, however has not yet been viability tested. This will be addressed by the Whole Plan Viability Assessment.
- **LBHF:** Advised LBW to consider the evidence that has been produced in support of the Affordable Workspace SPD. This includes a detailed examination of turnover and rents within the borough, and refers to a piece of work published by the OPDC on viability as a useful benchmark. The conclusions of the research suggest that there will potentially be a decampment of office floorspace from more central locations, and changes to the workplace as a result of the pandemic might not be as pessimistic as we think!
- **LBW:** The mixed-use redevelopment of safeguarded wharves is permitted in the Local Plan where this can assure that the operational capacity of the facility will not be compromised in the long-term. This is consistent with the London Plan Policy SI 15. These sites are identified as allocations within the draft Local Plan.
- The potential challenges of protecting office and industrial land which has been re-categorised as Class E, particularly in the context of proposed PDR, are noted by both boroughs.

e. *Town centres & retail*

- **LBW:** Updated the [Retail Needs Assessment in 2020](#), which identifies that there is no clear need to identify or plan for an increase in retail and food/beverage floorspace over the majority of the LP period (up to 2030), although a limited amount of need is forecast by 2035 (of approx. 7,300sqm). While this is based on pre-COVID data, it is considered that the impacts of this are most likely to further suppress future demand.
- **LBW:** Will consider whether to seek further work, even if only a position statement, by Lichfields (RNA) to help support this evidence for examination.
- **LBW:** With respect to the new E Class, the draft Plan no longer seeks to protect retail (the adopted policies have a threshold approach to A1). The frontages are retained as preferential locations for retail, although the Plan recognises that it is challenging to require this. As such, this might be subject to further revision at Reg 19, including potentially removing the frontages altogether or amalgamating some/all of the different frontage tiers. A clause is currently retained in the draft Local Plan which specifies that conditions might be applied to limit the uses (even within E). Generally, however, the policy seeks to welcome and accommodate the flexibility that E brings in these locations. Our RNA identifies that some of the centres currently 'over-perform' policy requirements (with respect to A1, shops), and the impact of E therefore may not be significant.
- **LBHF:** Similarly, the LPA is no longer able to apply a threshold based approach to retail protection anymore. LBHF have found that the broader criteria set out within the overarching retail policy has been useful tool. The role of historic shopfronts in conservation areas should also be considered with respect to potential PDR from E to C3.

f. Transport and other infrastructure

- **LBW:** The Draft Plan advocates support for the main ongoing infrastructure projects in the borough, including Crossrail 2. For CR2, the Plan recognises that the project may not come forward, and therefore incorporates a 'fallback' option that major development sites – particularly in Clapham Junction – would still be suitable for redevelopment even without this infrastructure, albeit on a likely reduced scale.

g. Water and waste management

- **LBW:** Waste is recognised as a strategic / cross-boundary issue. Our Duty to Cooperate responsibility on waste is being separately led by the Council's waste planning consultant, Victoria Manning of Vitaka Consulting, who has been in contact. For information, the Waste Technical Study found there to be a shortfall of up to 2.1ha, and the intention as set out in the Reg 18 Local Plan is this will be accommodated in the borough's existing designated industrial land.
- **LBHF:** Provided background to waste as a cross-boundary issue, including a proposal to share waste apportionment targets between LBHF, LBW, LB Lambeth and RB Kensington & Chelsea that was not realised. This was based on an OPDC proposal to de-designate a waste site. Since this time, the OPDC's vision has changed, and should the OPDC seek to safeguard two waste sites as part of their Plan, there may be scope to revisit discussions regarding pooling at a future date. LBHF consider it appropriate that LBW (and indeed LBHF) will seek to meet their waste apportionment requirement within their own boundaries, and are happy to include waste within a general Statement of Common Ground in line with the above. LBHF will progress this work as necessary with Victoria Manning and LBW.

h. Climate change, flooding & energy

- **LBW:** The draft Local Plan takes forward the London Plan's zero carbon approach with respect to major sites, and will introduce more rigorous requirements for developments on smaller sites (all new residential at least 35% reduction above TER on-site), which is an increase from 19% in the adopted Local Plan. This has not been viability tested (it will be considered as part of the Whole Plan Viability Assessment), and LBW will consider whether additional evidence-based work is needed to justify the approach.
- **LBW:** The latter reflects the declaration of a Climate Change Emergency, and the adoption of the Wandsworth Environmental and Sustainability Strategy (WESS), which seeks to achieve Zero Carbon by 2050 and Carbon neutrality as a council by 2030. This strategy is referenced within the Local Plan.
- **LBHF:** A climate change emergency was also declared in LBHF.

i. Community facilities (healthcare, education, community infrastructure)

- **LBW:** A revised Infrastructure Delivery Plan is being produced and will be published with the Regulation 19 version of the Local Plan. The most recent version was published in 2016. It will be confirmed as part of this work, however it is understood that LBW can meet its own educational and health care needs through identified sites within the borough. There is no capacity to assist with the needs of other boroughs.
- **LBW:** Council have developed a new Arts and Culture Strategy, which is in draft form. This will be put out for public consultation.

j. Natural environment

- **LBW:** Undertaken an update of the borough's Open Space Strategy (KKP). This is currently in draft form, available on our website. It will be finalised in liaison with Enable (who operate Wandsworth's parks and sports facilities) in January 2021. The borough has also commissioned a Playing Pitch Strategy (KKP), however this has been more affected by restrictions introduced to combat the pandemic.
- **LBW:** The Draft LP continues existing approaches to the protection of green space. The Local Plan does now incorporate an Urban Greening Factor (UGF). This relies on the values established in the draft London Plan, rather than a local formula. This will be kept under review.
- The boroughs agreed to share information about cross boundary playing pitch usage, where available. EMcC will enquire with KKP (consultants) on this as an **action**.

4. Statement of Common Ground

- **LBHF:** The borough are happy to sign a SoCG with LBW, setting out areas of agreement in line with the above. They are content for this to be part of a multilateral agreement if that is sensible (cf. Brent & Hounslow as recent examples).
- **LBHF:** It is recommended that LBW consider signing SoCG with developers in advance of the examination. This can be a helpful process for the Inspector

5. AOB

Meeting Minutes

Partner RB Kensington & Chelsea	Topic Duty to Cooperate	
Date Wednesday, 24 February 2021	Location MS Teams	Time 10:00 – 11:00

Meeting Attendees

Name	Organisation
Robert Wellburn	LB Wandsworth
Catriona Ramsey	LB Wandsworth
Eoghan McConville	LB Wandsworth
Preeti Gulati Tyagi	RB Kensington & Chelsea
Chris Turner	RB Kensington & Chelsea

Agenda Items

1. Introductions
 2. Local Plan update
- **LBW** provided update on Regulation 18 ‘Pre-Publication’ draft Local Plan, which is a full review. For more detailed information, please see [the Council’s website](#). Points of note:
 - The borough has commissioned an [Urban Design Study](#) for the first time as part of the Local Plan evidence base. This has been developed by Arup.
 - Most evidence was collected prior to the COVID-19 pandemic. While reference to this is made within the Plan, generally it is considered too early to adapt the approach to accommodate the impacts of this. The longer-term impact will be kept under review, including to assess whether / when evidence-based documents need updating.
 - Public consultation on the Reg 18 draft LP runs until 1 March 2021. An interactive map is [available](#). Alongside the ‘formal consultation’, we have been hosting events with ‘seldom heard’ groups, including young adults and estate residents. This has been led by a Public Practice Associate with an expertise in community engagement.
 - The ambition is to get the Regulation 19 version to the September committee, and therefore to consult on this in the autumn 2021. The Plan will be submitted to PINS in spring 2022, and adoption hoped for in spring/summer 2023. The Plan seeks therefore to proceed ahead of potential reforms identified within the White Paper, however we will retain a flexible approach, and will most likely commit to undertaking early reviews if and where necessary (as raised by Inspector).
 - Two SPDs have been identified as emerging from / associated with the Plan:
 - An area-based SPD for the Wandle Delta. The latter was published in the February 2021 committee, and is available for [public consultation](#) from 15 February to 21 March 2021. Some of the content for the site allocations and the area strategy for Wandsworth Town will be amended to fit in with the objectives of this document.
 - A Small Sites Development SPD will be developed in due course.
 - **RBKC** provided an update on the Local Plan. Points of note:
 - The current Local Plan was adopted in September 2019.

- Following adoption, RBKC started a partial review, holding an Issues consultation in September 2020. A further pre-Reg 18 'Issues & Options' consultation will be held in Summer 2021, followed by a consultation on the draft policies (Reg 18) in the Autumn. The ambition is for adoption in 2023.
- Various evidence base studies have been commissioned, including a Character Study of the borough (Arup). The RNA (Hatch / Urban Shape) has been impacted by COVID, and there are significant uncertainties around assessing need.
- RBKC are currently consulting on a [Draft Greening SPD](#), and aim to adopt this in April or May 2021.

3. Duty to Cooperate – strategic / cross-boundary issues:

a. Area strategies & site allocations

- **LBW:** The Draft Local Plan seeks to concentrate growth in the centres identified in the Plan's nine Area Strategies, which are collectively expected to deliver approximately ¾ of the 10-year housing supply. Growth will be particularly targeted to the VNEB OA (Nine Elms), Wandsworth Town and the Wandle Delta, and Clapham Junction (including the York Road / Winstanley Estate), and consequently these are the focus of our site allocations / masterplanning.
- **LBW:** The two Area Strategies that are likely to be most pertinent for **RBKC** are for Nine Elms, which seeks to continue the implementation of the VNEB OAPF, and the Strategy for Wandsworth's Riverside, which is an 'overarching' strategy that runs the length of the Thames. This encourages residential-led development (although much has already come forward), public realm improvements and seeks to strengthen pedestrian networks.
- **LBW:** The Area Strategy for Nine Elms promotes the Nine Elms Pimlico Bridge, with the Kirtling Street area of Nine Elms identified as the preferred landing site on the south bank. This remains an identified ambition for the borough, although it is quite possible that the impact of the pandemic will make it unlikely within the timescales of the Local Plan. It is further noted that Westminster CC are not supportive of additional river crossings unless it can be clearly demonstrated that there is an overarching strategic case for this.
- **RBKC:** Noted support for the Diamond Jubilee Bridge, including that RBKC had previously committed to support funding through CIL monies. While the proposals are still included within the LIP3, and will likely be included in the IDP, it has not been progressed. It is possible that ambitions to deliver it will be further affected by the financial implications of the pandemic.

b. Housing, including gypsies and travellers

- **LBW:** The Local Plan will aim to deliver at least 1,950 homes per year in line with the housing requirements set out in the London Plan. This is 70% more than the 2011 targets set out in the London Plan, however it is less than housing need as identified within the housing needs assessment. Using the standard methodology adopted in 2018, we would have a housing need figure of over 2,500 dwellings per year, and using the updated methodology from 2020 would provide a figure of 3,425 dwellings per year.
- **LBW:** In accordance with the NPPF, a comprehensive review of land and sites available for development (including large, small and windfall sites) was undertaken. This identified sufficient capacity to meet and even slightly exceed the housing requirements set out in the London Plan for years 1-10 of the Local Plan period, however there is a shortfall identified over the 15-year period. The draft Local Plan has a positive approach to housing delivery on small sites, an emphasis on a design led approach to optimise housing capacity, and opportunities to create homes through estate regeneration.
- **RBKC:** Interested in understanding the outcomes of the Character Study in informing capacity from small sites, and the scope of the future SPD that will be related to this. PGT will follow up with Emil Ancewicz (lead officer) independently.
- Neither borough is seeking assistance with their housing requirements.
- **LBW:** The Local Housing Need Assessment (LHNA), undertaken by GL Hearn, identifies a net need for 2,327 affordable rented and 1,248 affordable home ownership dwellings per annum to be provided over the plan period. The level of need is significant, and for that reason the proposed affordable housing policy (LP25) sets the aspiration to secure 50% of all new homes to be affordable, in line with the intent of the emerging London Plan. This will be informed further by the outcomes of a Whole Local Plan Viability Assessment.
- **LBW:** The Council has a long-established Gypsy and Traveller site in Earlsfield, which currently accommodates 11 residential pitches, one of which is vacant. The Gypsy and Traveller Accommodation Needs Assessment (2019), which was conducted in-house, found that there is no evidenced requirement or need for additional pitches to be provided on the existing site or elsewhere in the borough. If demand exceeds supply in the future, the Council will explore options to identify an additional site.

c. *Historic environment & tall buildings*

- **LBW:** Commissioned the [Urban Design Study \(UDS\)](#) to develop a better understanding of the values, character and sensitivity of different parts of the borough. The study identified 7 high level places and 21-character areas in the borough. This guidance has been embedded in the area strategies for different parts of the borough. The UDS recommended revising the currently adopted tall buildings policy. The draft policy identifies a number of local definitions of “tall” (informed by the local prevailing height) and identifies broad locations across the borough where tall buildings may be appropriate. There are three types of tall building zones: opportunity for tall building clusters, opportunities for tall buildings in town centres, opportunity for tall buildings within a local context. Maximum heights are not set. The Secretary of State’s Direction that tall buildings should not be less than 6 storeys or 18 metres impacts on recommended local definitions of tall within the UDS. This will need to be addressed.
- **LBW:** A portion of the Wandsworth’s Riverside adjacent to Kensington and Chelsea has been identified as having ‘opportunities for tall building clusters and/or landmarks’ or ‘Opportunities for tall buildings within town centres and along strategic routes’. Development proposals involving tall buildings will be assessed against the tall buildings criteria set out in the emerging London Plan, and additional Wandsworth-specific criteria listed in policy LP4 Tall Buildings. Although, tall buildings in these locations are likely to impact on views from Kensington and Chelsea, it is not considered that the impact would be unacceptable given that proposals will need to comply with the criteria set out in the policy.
- **RBKC:** There has not been resident opposition to the tall building proposals that have come forward thus far in this location.
- **LBW:** The policy on the historic environment seeks to preserve the significance of the historic environment and is considered unlikely to cause any cross-boundary issues.

d. *Employment land*

- **LBW:** The updated [Employment Land and Premises Study \(2020\)](#) suggests there is demand for office floorspace (22,500 sqm) and industrial land (8.6ha) in excess of supply., however does not account for the impact of the pandemic. This notwithstanding, the Draft Local Plan takes a protective approach. While the impact of the pandemic is recognised to a certain extent, the Plan commits to analysis of data once this has been gathered and generally does not seek to predict outcomes.
- **LBW:** Office development is promoted (through co-location with intensified industrial uses) in part of the Battersea, Queenstown Road SIL, as part of an initiative to create [Battersea Design and Tech Quarter](#). This is focused on creating a tech and creative industries hub which will build on investment in the Battersea Power Station development, including companies such as Apple, and is reflective both of the 2016 London Plan designation (‘Industrial Business Park’) and investor interest.
- **RBKC:** Challenging to understand the implications of the pandemic, which could alternatively realise a reduction in demand for office space, or see office space previously provided within the city being decamped to town centres. The LBW Local Plan supports ‘touchdown spaces’ in centres, including in retail frontages where an active frontage is maintained.
- The potential challenges of protecting office and industrial land which has been re-categorised as Class E are noted by both boroughs.
- The possible use of Article 4 directions to counter PDR (E to C3) was discussed (also in the context of town centres). LBW are awaiting further clarity on this following the consultation, with the hope that the proposals put forward will be amended to be more restrictive. CT noted that if LBW is overproviding office floorspace (through the BDTQ, etc) then this could make the adoption of an Article 4 direction challenging.

e. *Town centres & retail*

- **LBW:** Updated the [Retail Needs Assessment in 2020](#), which identifies that there is no clear need to identify or plan for an increase in retail and food/beverage floorspace over the majority (up to 2035) of the LP period. While this is based on pre-COVID data, it is considered that the impacts of this are most likely to further suppress future demand.
- **LBW:** In respect to the new E Class, the draft Plan no longer seeks to protect retail (the adopted policies have a threshold approach to A1). The frontages are retained as preferential locations for retail, although the Plan recognises that it is challenging to enforce this. A clause is retained in the draft Local Plan which specifies that conditions might be applied to limit the uses (even within E). Generally, however, it seeks to welcome the flexibility that E brings in these locations.
- **RBKC:** CT noted that imposing challenges on new development could be perceived as being unfair – as this requirement is not applicable to existing retail uses, and we would not want to discourage development.

- **RBKC:** Commissioned Hatch and Urban Shape to conduct a Retail and Leisure Needs Assessment & Town Centre Study, which will involve telephone surveying of the residents in the north of Wandsworth. **LBW** have shared information on recent applications impacting retail & leisure uses.

f. Transport and other infrastructure

- **LBW:** The Draft Plan advocates support for the main ongoing infrastructure projects in the borough, including Crossrail 2. For CR2, the Plan recognises that the project may not come forward, and therefore incorporates a ‘fallback’ option that major development sites – particularly in Clapham Junction – would still be suitable for redevelopment even without this infrastructure, albeit on a likely reduced scale.
- **LBW:** The borough’s ambition to implement the Nine Elms Pimlico Bridge is noted above.

g. Water and waste management

- **LBW:** Duty to Cooperate on waste is being separately led by the Council’s waste planning consultant, Victoria Manning of Vitaka Consulting. The Waste Technical Study found there to be a shortfall of up to 2.1ha, and the intention is this will be accommodated in the borough’s existing designated industrial land.
- **RBKC:** This is recognised as a strategic issue, and noted previous challenges on cross-boundary working with Hammersmith & Fulham as part of previous (now dropped) proposals to share the borough’s waste apportionment (along with LBW and LB Lambeth).

h. Climate change, flooding & energy

- **LBW:** The draft Local Plan takes forward the London Plan’s zero carbon approach with respect to major sites, and will introduce more rigorous requirements for developments on smaller sites (all new residential at least 35% reduction above TER on-site), which is an increase from 19% in the adopted Local Plan. This has not been viability tested (it will be considered as part of the Whole Plan Viability Assessment), and LBW will consider whether additional evidence-based work is needed to justify the approach.
- **LBW:** The latter reflects the declaration of a Climate Change Emergency, and the adoption of the Wandsworth Environmental and Sustainability Strategy (WESS), which seeks to achieve Zero Carbon by 2050 and Carbon neutrality as a council by 2030. This strategy is referenced within the Local Plan.

i. Community facilities (healthcare, education, community infrastructure)

- **LBW:** A revised Infrastructure Delivery Plan is being produced and will be published with the Regulation 19 version of the Local Plan. The most recent version was published in 2016. It will be confirmed as part of this work, however it is understood that LBW can meet its own educational and health care needs through identified sites within the borough. There is no capacity to assist with the needs of other boroughs.
- **LBW:** Council have developed a new Arts and Culture Strategy, which is in draft form. This will be put out for public consultation.

j. Natural environment

- **LBW:** Undertaken an update of the borough’s Open Space Strategy (KKP). This is currently in draft form, available on our website. It will be finalised in liaison with Enable (who operate Wandsworth’s parks and sports facilities) in January 2021. The borough has also commissioned a Playing Pitch Strategy (KKP), however this has been more affected by restrictions introduced to combat the pandemic.
- **LBW:** The Draft LP continues existing approaches to the protection of green space. The Local Plan does now incorporate an Urban Greening Factor (UGF). This relies on the values established in the draft London Plan, rather than a local formula. This will be kept under review.

4. Statement of Common Ground

- **RBKC:** The borough are happy to sign a SoCG with LBW, setting out areas of agreement in line with the above. They are content for this to be part of a multilateral agreement if that is sensible (cf. Brent, H&F, and WCC as recent examples).



Meeting Minutes

Partner
RB Kingston upon Thames

Topic
Duty to Cooperate

Date
Wednesday, 27 January 2021

Location
MS Teams

Time
14:00 – 16:00

Meeting Attendees

Name	Organisation
Robert Wellburn	LB Wandsworth
Emil Ancewicz	LB Wandsworth
Alisha Levermore	LB Wandsworth
Eoghan McConville	LB Wandsworth
Thomas Sild	RB Kingston upon Thames
Hannah Harris	RB Kingston upon Thames

Actions – identified in red in body.

- LBW** to update RBK on the ambitions for the Kingston University Roehampton Vale site once this has been clarified (EMcC, RW).
- LBW** have updated RB Kingston's contact details to include localplan@kingston.gov.uk. (RW, actioned)

Agenda Items

- Introductions
- Local Plan update
 - LBW** provided update on Regulation 18 'Pre-Publication' draft Local Plan. For more detailed information, please [the Council's website](#). Points of note:
 - The borough has commissioned an [Urban Design Study](#) for the first time as part of the Local Plan evidence base. This has been developed by Arup.
 - Most evidence was collected prior to the COVID-19 pandemic. While reference to this is made within the Plan, generally it is considered too early to adapt the approach to accommodate the impacts of this. The longer-term impact will be kept under review, including to assess whether / when evidence-based documents need updating.
 - Public consultation on the Reg 18 draft LP will run until 1 March 2021. All documents are now available online. An interactive map is [available](#). There is ambition to undertake more engagement than normally / statutorily required. Following an in-person event in Jan 2020, we will be hosting events with 'seldom heard' groups, including young adults and estate residents. This is being led by a Public Practice Associate with an expertise in community engagement.
 - The ambition is to get the Regulation 19 to the September committee, and therefore to consult on this in the autumn 2021. The Plan will be submitted to PINS in spring 2022, and adoption hoped for in spring/summer 2023.
 - Two SPDs have been identified as emerging from / associated with the Plan: a Small Sites Development SPD; and an area-based SPD for the Wandle Delta. The latter was published in the February 2021 committee. Some of the content for the site allocations and the area strategy for Wandsworth Town will be amended to fit in with the objectives of this document.
 - RBK** provided an update on the Local Plan. Points of note:

- There is a new portfolio holder in place since March 2020, which has affected timescales.
- The LPA are also experiencing difficulties with the evidence base due to the impact of the pandemic, particularly on town centres and economic land.
- There is a significant focus on engagement (more typical for RBK) and a further Reg 18 consultation is anticipated for the spring. This won't yet feature a whole plan. The ambition is to produce a Reg 18 version by the May 2022 elections, which will enable the plan to be built on a robust evidence base and informed by the community. The Core Strategy is from 2012.

3. Duty to Cooperate – strategic / cross-boundary issues:

a. Area strategies & site allocations

- **LBW:** The Draft Local Plan seeks to concentrate growth in the centres identified in the Plan's nine Area Strategies, which are collectively expected to deliver 15,200 homes, or 74% of the 10-year housing supply. Growth will be particularly targeted to the VNEB OA (Nine Elms), Wandsworth Town and the Wandle Delta, and Clapham Junction (including the York Road / Winstanley Estate), and consequently these are the focus of our site allocations / masterplanning.
- **LBW:** There is one sites allocation near to the border: the ASDA site in Roehampton Vale (reference in the Local Plan: OUT3). The allocation is for a mixed-use building with residential and the retention of the existing facility. RBK are invited to look at this in more detail as part of the response to the Reg 18 (if forthcoming), although it is not considered to present any cross-boundary issues.
- The Kingston University Roehampton Vale site was discussed. The LBW draft Local Plan references this site, stating that "Kingston University aims to relocate its existing teaching facilities from Roehampton Vale to the RB Kingston upon Thames and use the Roehampton Vale site for student accommodation". EMcC noted that this position might be revised as the University considers its position in light of the impact of Brexit and ongoing work on other student accommodation developments. LBW are in the process of updating the IDP and will be in contact with Kingston University to clarify this. Will update RBK as an **action**.
- **RBK** noted that there is a lot of student accommodation within the borough, including sites that are under capacity. Both boroughs follow the requirements of the London Plan.

b. Housing, including gypsies and travellers

- **LBW:** The Local Plan will aim to deliver at least 1,950 homes per year in line with the housing requirements set out in the London Plan, 7% more than the 2015 target and 70% more than the 2011 targets set out in the London Plan. The draft Local Plan has a positive approach to housing delivery on small sites, an emphasis on a design led approach to optimise housing capacity, and opportunities to create homes through estate regeneration.
- **LBW:** Identified capacity to meet and even slightly exceed the housing requirements set out in the London Plan for years 1-10 of the Local Plan period, however there is a shortfall identified over the 15-year period (noted that LBW consider there to be uncertainty over the longer-term figures). To note, the capacity is substantially smaller than the local housing need figure. Using the standard methodology adopted in 2018, we would have a housing need figure of over 2,500 dwellings per year, and using the updated methodology from 2020 would provide a figure of 3,400 dwellings per year.
- **LBW:** The Local Housing Need Assessment (LHNA) identifies a net need for 2,327 affordable rented and 1,248 affordable home ownership dwellings per annum to be provided over the plan period. The level of need is significant, and for that reason the proposed affordable housing policy (LP25) sets the aspiration to secure 50% of all new homes to be affordable, in line with the intent of the emerging London Plan. This will be informed further by the outcomes of a Whole Local Plan Viability Assessment.
- **LBW:** The Council has a long-established Gypsy and Traveller site, which currently accommodates 11 residential pitches, one of which is vacant. The Gypsy and Traveller Accommodation Needs Assessment (2019), which was conducted in-house, found that there is no evidenced requirement or need for additional pitches to be provided on the existing site or elsewhere in the borough. If demand exceeds supply in the future, the Council will explore options to identify an additional site.
- **RBK:** The borough is also working towards the housing requirements set out in the London Plan, which is 964 per year in the new Plan (up from 643 in the currently adopted Plan). It is understood that the figure can be met, although the LPA will hold another call for sites in the spring to try and identify additional capacity.
- **RBK:** There is a high need for gypsies and travellers (all sites in the green belt) and consider that it is unlikely to meet this need. RBK asked whether LBW could help to meet this need, however LBW are unable to do so.

c. *Historic environment & tall buildings*

- **LBW:** Commissioned the [Urban Design Study \(UDS\)](#) to develop a better understanding of the values, character and sensitivity of different parts of the borough. The study identified 7 high level places and 21-character areas in the borough, each with different character, capacity and sensitivity to growth, and different development guidance. This guidance has been embedded in the area strategies for different parts of the borough. The UDS recommended revising the currently adopted tall buildings policy. The draft policy identifies a number of local definitions of “tall” (informed by the local prevailing height) and identifies broad locations across the borough where tall buildings may be appropriate. There are three types of tall building zones: opportunity for tall building clusters, opportunities for tall buildings in town centres, opportunity for tall buildings within a local context. Maximum heights are not set.
- **LBW:** There are no tall building zones identified near to the boundary with RBK, and this is not considered to be a strategic issue.
- **LBW:** The policy on the historic environment seeks to preserve the significance of the historic environment and is considered unlikely to cause any cross-boundary issues.

d. *Employment land*

- **LBW:** The updated [Employment Land and Premises Study \(2020\)](#) suggests there is demand for office floorspace (22,500 sqm) and industrial land (8.6ha) in excess of supply. The Draft Local Plan therefore takes a protective approach.
- **LBW:** Following the draft London Plan, Policy E5, LBW have designated ‘Summerstown’ as a SIL. This replaces the existing designation as a Locally Significant Industrial Area (LSIA); the borough equivalent of the LSIS. Co-location is not permitted in LSIA’s in the draft Local Plan (re: Policy E7 of the draft London Plan).
- **RBK:** Initial findings from the evidence base (Lichfields) suggests that there will be a need for additional office space, despite the impact of COVID. It might be interesting to consider this once the study has been finalised.
- **RBK:** SILs will continue to be protected.
- No strategic or cross-boundary issues identified.

e. *Town centres & retail*

- **LBW:** Updated the [Retail Needs Assessment in 2020](#), which identifies that there is no clear need to identify or plan for an increase in retail and food/beverage floorspace over the majority (up to 2035) of the LP period. While this is based on pre-COVID data, it is considered that the impacts of this are most likely to further suppress future demand.
- **LBW:** In respect to the new E Class, the draft Plan no longer seeks to protect retail (the adopted policies have a threshold approach to A1). The frontages are retained as preferential locations for retail, although the Plan recognises that it is challenging to enforce this. A clause is retained in the draft Local Plan which specifies that conditions might be applied to limit the uses (even within E). Generally, however, it seeks to welcome the flexibility that E brings in these locations.
- **RBK:** Also finding this a challenging approach; the current approach is considering removal of frontages and retention of the Primary Shopping Area in Kingston.
- **LBW:** The draft Local Plan recognises Kingston as a Metropolitan centre (as in London Plan), and that it therefore captures some of Wandsworth’s broader entertainment and cultural need.
- **RBK:** Intention is to continue to bring forward the Kingston Opportunity Area, despite uncertainty around the delivery of CR2. RBK are considering how to re-frame the OA should CR2 not be realised, although the potentially revised boundaries would not stretch to the border with LBW.
- No strategic or cross-boundary issues identified.

f. *Transport and other infrastructure*

- **LBW:** The Draft Plan advocates support for the main ongoing infrastructure projects in the borough, including Crossrail 2. For CR2, the Plan recognises that the project may not come forward, and therefore incorporates a ‘fallback’ option that major development sites – particularly in Clapham Junction – would still be suitable for redevelopment even without this infrastructure, albeit on a likely reduced scale.
- **RBK:** Still finalising the approach to CR2 within the emerging draft Plan, and therefore helpful to understand approach.
- Both boroughs will continue to work the GLA / TfL on this issue.

- **LBW:** Noted the GLA's new London Borough Infrastructure Network, which seeks to support boroughs to strategically align infrastructure works.

g. Water and waste management

- **LBW:** Duty to Cooperate on waste is being led by the Council's waste consultant, Victoria Manning of Vitaka Consulting, who will deal with this separately. The Waste Technical Study found there to be a shortfall of up to 2.1ha, and the intention is this will be accommodated in the borough's existing designated industrial land.
- **RBK:** Forms part of the South London Waste Plan. A review of the Plan has been submitted to and accepted by the Inspector.
- No strategic or cross-boundary issues identified.

h. Climate change, flooding & energy

- **LBW:** The draft Local Plan takes forward the London Plan's zero carbon approach with respect to major sites, and will introduce more rigorous requirements for developments on smaller sites (all new residential at least 35% reduction above TER on-site), which is an increase from 19% in the adopted Local Plan. This has not been viability tested (will be considered as part of the Whole Plan Viability Assessment), and will need additional evidence-based work to justify the approach; it is currently based on Richmond's approach (as part of the SSA) and reflects political aspirations.
- **LBW:** The latter reflects the declaration of a Climate Change Emergency, and the adoption of the Wandsworth Environmental and Sustainability Strategy (WESS), which seeks to achieve Zero Carbon by 2050 and Carbon neutrality as a council by 2030. This strategy is referenced within the Local Plan. Further work on embedding the WESS within the Local Plan will need to be made for the Reg 19 version of the Local Plan. We are expecting further feedback on this issue within the Reg 18 consultation.
- **RBK:** The targets for Kingston are 2038 for internal operations (as a Council) and zero carbon by 2050 across the borough in line with the London-wide strategy.
- **RBK:** Alignment on approaches to small sites are welcomed, so there isn't discrepancy across the boundaries. Recognised that this will need to be built upon individual evidence bases.

i. Community facilities (healthcare, education, community infrastructure)

- **LBW:** A revised Infrastructure Delivery Plan is being produced and will be published with the Regulation 19 version of the Local Plan. The most recent version was published in 2016. It will be confirmed as part of this work, however it is understood that LBW can meet its own educational and health care needs through identified sites within the borough. There is no capacity to assist with the needs of other boroughs.
- **RBK:** The borough does not currently have an IDP but are in the process of drafting one. There are some pressures for meeting educational needs within the north of the borough, however this should not impact LBW. It is broadly considered that the borough can meet its own needs, however this will be confirmed by the IDP.

j. Natural environment

- **LBW:** Undertaken an update of the borough's Open Space Strategy (KKP). This is currently in draft form, available on our website. It will be finalised in liaison with Enable (who operate Wandsworth's parks and sports facilities) in January 2021. The borough has also commissioned a Playing Pitch Strategy (KKP), however this has been more affected by restrictions introduced to combat the pandemic.
- **RBK:** Intention to update the PPS, which will be led by the Leisure team. The OSS is quite dated and will need to be updated – however given the current circumstances it is sensible to hold off this work. Green belt and MOL were reviewed more recently.
- **LBW:** The Draft LP continues existing approaches to the protection of green space. The Local Plan does now incorporate an Urban Greening Factor (UGF). This relies on the values established in the draft London Plan, rather than a local formula. This will be kept under review.
- Both boroughs agreed to support green links and green chains that cross over boundaries.

4. Statement of Common Ground

- **LBW:** Will be drafting a Statement of Common Ground. The intention is for this to be thematic, and to therefore only produce a joint one for all parties to sign, however this will need to be decided. LBW will share a draft once this has been written, in advance of the Reg 19 consultation.

5. AOB

- **LBW:** Explanation given over the SSA, and the relationship between Richmond and Wandsworth. The 'sovereignty' of each borough is retained, although certain staff are shared.
- **RBK:** Need to ensure that contact details within LBW's database are up to date. The correct details are localplan@kingston.gov.uk. This is recorded as an **action**.

Meeting Minutes

Partner LB Lambeth	Topic Duty to Cooperate	
Date Monday, 25 January 2019	Location MS Teams	Time 14:00 – 16:00

Meeting Attendees

Name	Organisation
Robert Wellburn	LB Wandsworth
Emil Anczewicz	LB Wandsworth
Alisha Levermore	LB Wandsworth
Eoghan McConville	LB Wandsworth
Catherine Carpenter	LB Lambeth
Robert East	LB Lambeth

Actions

1. **LB Lambeth** will review the draft Wandsworth Local Plan and make representations as necessary, noting the discussions in this meeting.

Agenda Items

1. Introductions
 2. Local Plan update
- **LBW** provided update on Regulation 18 'Pre-Publication' draft Local Plan. For more detailed information, please [the Council's website](#). Points of note:
 - The borough has commissioned an [Urban Design Study](#) for the first time as part of the Local Plan evidence base. This has been developed by Arup.
 - Most evidence was collected prior to the COVID-19 pandemic. While reference to this is made within the Plan, generally it is considered too early to adapt the approach to accommodate the impacts of this. The longer-term impact will be kept under review, including to assess whether / when evidence-based documents need updating.
 - Public consultation on the Reg 18 draft LP will run until 1 March 2021. All documents are now available online. An interactive map is [now available](#). The consultation will be supported by events with 'seldom heard' groups, including young adults and estate residents. This is being led by a Public Practice Associate with an expertise in community engagement.
 - The ambition is to get the Regulation 19 to the September committee, and therefore to consult on this in the autumn 2021. The Plan will be submitted to PINS in spring 2022, and adoption hoped for in spring/summer 2023.
 - Two SPDs have been identified as emerging from / associated with the Plan: a Small Sites Development SPD; and an area-based SPD for the Wandle Delta. The latter was published in the February 2021 committee. Some of the content for the site allocations and the area strategy for Wandsworth Town will be amended to fit in with the objectives of this document.
 - **LBL** provided an update on the Local Plan. Points of note:
 - Lambeth have an adopted 2015 Local Plan and are now in the final stages of an in-depth partial review.

- LBL had the examination hearing on the Local Plan in autumn 2020 and expect to hear from the Inspector imminently. The Plan shadows the emerging London Plan, with the ambition to adopt in summer 2021.
 - The Inspector asked LBL to confirm the 5-year housing land supply, which necessitated the production of a large amount of additional information.
 - The Inspector also asked for clarification on the impact of the introduction of E Use Class. LBL set out a [response paper](#), known as LBL02, detailing their initial comments on the impact of the Use Classes Order. LBL02 also analysed the impact of the changes on those policies considered to be affected and proposed a way forward for each policy. LBL proposed to use planning obligations / conditions to limit uses within E class in certain development. Upon the failure of the legal challenge, LBL changed references to the old use classes to simply state the use.
- The review does not include site allocations which will be brought forward in a separate DPD. This will focus on 15-20 sites, and will be design-led, including testing of heights, sunlight and daylight impacts, viability, etc. The target is to undertake regulation 18 consultation in the summer 2020. Not considered that any new sites are located near to the LBW border.
- New SPDS include: Vauxhall area; affordable workspace; design code; local views. In the future also ambitions for a SPD focused on Norwood High Street.

3. Duty to Cooperate – strategic / cross-boundary issues:

a. Housing, including gypsies & travellers

- **LBW:** The Local Plan will aim to deliver at least 1,950 homes per year in line with the housing requirements set out in the London Plan, 7% more than the 2015 target and 70% more than the 2011 targets set out in the London Plan. The draft Local Plan has a positive approach to housing delivery on small sites, an emphasis on a design led approach to optimise housing capacity, and opportunities to create homes through estate regeneration. The Local Plan will aim to deliver different types of housing including Built to Rent, housing for students, and housing for the elderly.
- **LBW:** Identified capacity to meet and even slightly exceed the housing requirements set out in the London Plan for years 1-10 of the Local Plan period, however there is a shortfall identified over the 15-year period (noted some uncertainty over the longer-term). The capacity is substantially smaller than the local housing need figure.
- **LBW:** The Local Housing Need Assessment (LHNA) identifies a net need for 2,327 affordable rented and 1,248 affordable home ownership dwellings per annum to be provided over the plan period. The level of need is significant, and for that reason the proposed affordable housing policy (LP25) sets the aspiration to secure 50% of all new homes to be affordable, in line with the intent of the emerging London Plan. This will be informed further by the outcomes of a Whole Local Plan Viability Assessment and will be updating the Nine Elms Development Infrastructure Funding Study.
- **LBL:** Did not undertake a borough level assessment; rather adopting the London Plan targets for housing. LBL are also taking forward a Built to Rent policy.
- Neither LPA is asking for help in order to meet their housing need. No strategic of cross-boundary issues identified.
- **LBW:** The Council has a long-established Gypsy and Traveller site, which currently accommodates 11 residential pitches, one of which is vacant. The Gypsy and Traveller Accommodation Needs Assessment (2019) found that there is no evidenced requirement or need for additional pitches to be provided on the existing site or elsewhere in the borough. If demand exceeds supply in the future, the Council will explore options to identify an additional site.
- Both boroughs welcomed the SoS amendment on the definition for gypsies and travellers being used in the London Plan.

b. Historic environment & tall buildings

- **LBW:** Commissioned the [Urban Design Study \(UDS\)](#) to develop a better understanding of the values, character and sensitivity of different parts of the borough. The study divides the borough into seven high level areas, and a further 21 character areas within these with different capacities and sensitivities for growth. The UDS recommended revising the currently adopted tall buildings policy. The draft policy identifies a number of local definitions of “tall” (informed by the local prevailing height) and identifies broad locations across the borough where tall buildings may be appropriate. Outside of these areas proposals for tall buildings will be refused. There are three types of tall building zones: opportunity for tall building clusters, opportunities for tall buildings in town centres, opportunity for tall buildings within a local context. Maximum heights are not set.
- **LBW:** The northern part of the Nine Elms Opportunity Area has been identified as having the opportunity for a cluster of tall buildings. Any proposals for tall buildings in that area will continue to be assessed in the line with the

VNEB (Vauxhall, Nine Elms, Battersea) Tall Buildings Strategy. The southern part has been identified as having an opportunity for tall buildings within a local context. There may be some specific sites that can accommodate tall buildings of up to 5/6 stories high. A few other areas that border Lambeth have been identified as having the opportunity for tall buildings within a local context. All of these are outlined on the Tall Buildings maps. See interactive map (above).

- **LBL:** The Plan identifies locations within Waterloo, Vauxhall and Brixton which are suitable for tall buildings, in accordance with the London Plan approach. There is a policy for consideration of tall buildings outside of these locations.
- **LBL:** Will carefully consider the tall buildings policies as part of the review of the Regulation 18 consultation and will submit comments if required.
- **LBW:** The policy on the historic environment seeks to preserve the significance of the historic environment and is considered unlikely to cause any cross-boundary issues.

c. *Employment land*

- **LBW:** The updated [Employment Land and Premises Study \(2020\)](#) suggests there is demand for office floorspace (22,500 sqm) and industrial land (8.6ha) in excess of supply. The Draft Local Plan therefore takes a protective approach. Co-location is not permitted in LSIs (the local equivalent of the LSIS) in the draft Local Plan (re: Policy E7 of the draft London Plan).
- **LBW:** For offices, the draft Plan continues the approach established within the Employment and Industry Local Plan (2018), distinguishing between two office markets: the CAZ in Nine Elms and the local/ sub-regional market in the rest of the borough.
- **LBW:** Office intensification is promoted in part of the Battersea, Queenstown Road SIL, as part of the [Battersea Design and Tech Quarter](#) initiative. This is focused on creating a tech and creative industries hub which will build on investment in the Battersea Power Station development.
- **LBW:** The draft Local Plan includes an affordable workspace policy seeking 10% of the economic floorspace as affordable provision (for schemes over 1000 sqm). Within the VNEB OA, this can be realised as a reduction below market rent by 50% (an increase on the adopted position of 20%) or as managed / 'open' workspace. This has not been viability tested but will be looked at as part of the Whole Plan Viability Assessment. It may therefore be subject to review.
- **LBL:** Does not have any SIL; but it does have LSIs known as Key Industrial and Business Areas (KIBAs). The Local Plan review designates four new KIBAs. Three KIBAs are being considered for co-location with residential due to their particular circumstances.
- **LBL:** Identified shortfall in waste, however the LPA was able to demonstrate that this could be met within the KIBAs by taking a flexible approach. This also supports the resistance to co-location / residential in most of these designated areas (indeed this was a significant justification for the policy approach).
- **LBL:** Supportive of the approach to affordable workspace, as this would help to achieve parity across the whole opportunity area and would avoid disparity across the border.
- **LBL:** Will carefully assess what is being proposed through the designation of the Battersea Design and Technology Quarter, and the introduction of a more significant quantum of office floorspace within this location. The Queenstown Road, Battersea SIL is adjacent to a KIBA in Lambeth. LBW notes the relatively isolated / segregated nature of the areas of the SIL being proposed for the BDTQ. LBL will review and make representations as necessary as part of the Reg 18 consultation.
- **LBW:** Noted an appeal that was successful against the Council for a site on Penwith Road (Thornsett Road LSI), which introduced residential and commercial uses within designated industrial land. The proximity to Earlsfield local centre was heavily weighed as a benefit for the introduction of other uses, as was the fact that intensified industrial uses were introduced. LBW shared details of the appeal (LBW's planning application numbers are 2018/1426 & 2019/1427, joint appeal).

d. *Town centres & retail*

- **LBW:** Updated the Retail Needs Assessment in 2020, which identifies that there is no clear need to identify or plan for an increase in retail and food/beverage floorspace over the majority (up to 2035) of the LP period.
- **LBW:** The draft Local Plan seeks to accommodate the introduction of the E Use Class within their plans with respect to town centres & appropriate uses, welcoming the flexibility that this brings.

- **LBW:** Have noted comments submitted by Lambeth on the Issues document advocating for a stronger stance on out of centre development. This is now proposed in the draft LP to help support the centres, and previous exemptions for smaller units no longer applicable, and the sequential test now applicable in our Focal Points of Activity.
- **LBW:** The Plan continues to support the London Plan's identified potential CAZ retail clusters of Vauxhall and Battersea. The Vauxhall CAZ retail site lies largely in Lambeth, but Wandsworth continue to work with Lambeth to ensure development caters for local residents and workers.
- **LBL:** Lavender Hill and Clapham South are both shared retail centres. Both were considered within the existing Statement of Common Ground (prepared in support of Lambeth's Local Plan) which continues to apply.

e. Transport and other infrastructure

- **LBL:** Considered a cross-boundary issue, as it is important that strategies and approaches align across the border. Lambeth has a focus on promoting walking and cycling. A similar modal push towards active travel is being made in the LBW Local Plan. The sustainable transport policies seek to meet the GLA's Healthy Streets objectives.
- **LBW:** The policy approach to parking is generally aligned with the London Plan approach.

f. Water and waste management

- **LBL:** Waste is recognised as a cross-boundary issue due to the shipping of waste across the border.
- **LBW:** Duty to Cooperate on waste is being led by the Council's waste consultant, Victoria Manning of Vitaka Consulting.

g. Climate change, flooding & energy

- No new strategic or cross-boundary issues identified or anticipated, and therefore will rely on what is set out in the agreed SoCG agreed in December 2019.

h. Community facilities (healthcare, education, community infrastructure)

- No new strategic or cross-boundary issues identified or anticipated, and therefore will rely on what is set out in the agreed SoCG agreed in December 2019.

i. Natural environment

- Joint working on the continuity of the Thames Path is supported.
- No new strategic or cross-boundary issues identified or anticipated, and therefore will rely on what is set out in the agreed SoCG agreed in December 2019.

4. Statement of Common Ground

- A Statement of Common Ground was agreed between the boroughs in 2019. This will continue to serve as the baseline for the duty to cooperate topics identified above.
- **LBL:** Expressed preference for a bilateral SoCG (as above), however will work with LBW as they progress this in support of the Wandsworth Local Plan. LBW seek to progress this work in the coming months and will share a draft version (whether collective or bilateral) in advance of the Reg 19 consultation.

5. AOB

- LBW noted a number of site allocations that are located near to the Lambeth border. LBL will consider these as part of the Reg 18 consultation review.



Meeting Minutes

Partner
London Borough of Merton

Topic
Duty to Cooperate

Date
Friday, 22 January 2021

Location
MS Teams

Time
10:00 – 11:30

Meeting Attendees

Name (Organisation)	
Robert Wellburn (RW) (LB Wandsworth)	Tim Cathy (TC) (LB Merton)
Emil Ancewicz (EA) (LB Wandsworth)	Katharine Fox (KF) (LB Merton)
Alisha Levermore (LB Wandsworth)	Tara Butler (TB) (LB Merton)
	Valerie Mowah (VM) (LB Merton)

Actions – identified in red in body.

1. **LBM** to involve LBW in pre-application discussions on the All England Lawn Tennis Club site (Wi3) in Wimbledon Park. (TB to follow up with LBW DM)
2. **LBW** agreed to consider involving LBM if they commission a supplementary note on economic land to further support the Employment Land and Premises Study. (RW)
3. **LBM and LBW** involved in discussions relating to the S106 Wandle Trail project in Earlsfield, and to send through information relating to this for mapping purposes. LBW can add this information to the Reg 19 version of the Local Plan. (TB, RW)
4. **LBM** to ensure that LBW Officers are contacted regarding the planning application on the lake (reservoir) in Wimbledon Park. (TB)
5. **LBW** to update LBM on responses to the Reg 18 Local Plan concerning air quality with regard to the group who have concerns about the Durnsford Road area.
6. **LBM** to pose questions on Urban Greening Factor, if required. These should be emailed to Eoghan McConville. (KF)

Agenda Items

1. Introductions
 2. Local Plan update
- **LBW** provided update on Regulation 18 ‘Pre-Publication’ draft Local Plan. For more detailed information, please [the Council’s website](#). Points of note:
 - The borough has commissioned an [Urban Design Study](#) for the first time as part of the Local Plan evidence base. This has been developed by Arup.
 - Most evidence was collected prior to the COVID-19 pandemic. While reference to this is made within the Plan, generally it is considered too early to adapt the approach to accommodate the impacts of this. The longer-term impact will be kept under review, including to assess whether / when evidence-based documents need updating.
 - Public consultation on the Reg 18 draft LP will run until 1 March 2021. All documents are now available online. An interactive map is [now available](#). The consultation will be supported by events with ‘seldom heard’ groups, including young adults and estate residents. This is being led by a Public Practice Associate with an expertise in community engagement.

- The ambition is to get the Regulation 19 to the September committee, and therefore to consult on this in the autumn 2021. The Plan will be submitted to PINS in spring 2022, and adoption hoped for in spring/summer 2023.
- Two SPDs have been identified as emerging from / associated with the Plan: a Small Sites Development SPD; and an area-based SPD for the Wandle Delta. The latter was published in the February 2021 committee. Some of the content for the site allocations and the area strategy for Wandsworth Town will be amended to fit in with the objectives of this document.
- **LBM** provided an update on the Local Plan. Points of note:
 - The Local Plan Review seeks to update the Core Strategy (2011) and the DMPD (2014). A first Regulation 18 version was produced and consulted on in 2018-2019, which was aligned to the original London Plan drafts. The main 'direction of travel' set out within the draft Local Plan is to combat climate change and to support the provision of affordable housing. The housing target, which has increased from 411 homes/year to 918 homes/year is particularly challenging.
 - The ambition is to take the draft Local Plan to July Council.
 - LBM also have a Public Practice Associate, who has been leading work on a borough Character Study, as well as a Small Sites Toolkit, which will be adopted as SPDs in 2021. Both are out for consultation from 9/2/21 until 23/3/21.
 - The Estates Local Plan (adopted 2018) will be retained and the 2012 South London Waste Plan is being updated and has been submitted to the Planning Inspectorate.

3. Duty to Cooperate – strategic / cross-boundary issues:

a. Overall strategy for each Local Plan and potential cross boundary issues

- **LBW:** The Draft Local Plan seeks to concentrate growth in the centres identified in the Plan's nine Area Strategies, which are collectively expected to deliver 15,200 homes, or 74% of the 10-year housing supply. Growth will be particularly targeted to the VNEB OA (Nine Elms), Wandsworth Town and the Wandle Delta, and Clapham Junction (including the York Road / Winstanley Estate), and consequently these are the focus of our site allocations / masterplanning.
- **LBW:** The Plan includes an overarching Area Strategy for the Wandle Valley, which borders with Merton in the south. The broad approach set out within the strategy is for the protection of the industrial land in that capacity, and to support green infrastructure (balancing recreational uses with biodiversity function).
- **LBM:** The Draft Local Plan takes forward a town centre first approach, including in Morden and Wimbledon (Future Wimbledon SPD), Estates Regeneration (High Path, Eastfields and Ravensbury), however there is a much greater focus on small site delivery. Not proposing co-location of industrial and residential uses in this draft.
- **LBM:** The area-based chapter on the Wandle Valley has been removed from the Local Plan, however LBM will continue to work with LBW on the identification of cross-boundary green links in this area.

b. Potential site allocations with cross boundary issues

- **LBW:** Noted the 'St George's Hospital Car Park and adjoining land on Blackshaw Road, Maybury Street, SW17' site allocation (Ref: TO2). This is on page 150 of the Local Plan. LBM advised to review as part of the broader response to the Reg 18 Plan.
- **LBM:** There are a number of site allocations which border LBW:
 - The Wimbledon Stadium site (Wi12) is not considered to raise any new issues, and will likely be finished by the adoption of the Local Plan. This is agreed by LBW.
 - The All England Lawn Tennis Club (Wi3) overlaps with LBW, and the northern part of the site is in LBW ownership (although managed by LBM). With the closure of the Bank of England site (the Championships need to move out by 2030), the intention is to bring tennis-related development to Wimbledon Park on the exiting golf course to enable to full tournament to take place on site. There are numerous planning constraints: the golf course is part of a Capability Brown designed Grade II* Registered Park and Garden, and is designated MOL, SINC, Open Space, and is within a Conservation Area. There will likely be cross-boundary impacts of the development. It was agreed as an **action** to that LBW will be involved in pre-application / application discussions.

c. *Housing*

- **LBW:** The Local Plan will aim to deliver at least 1,950 homes per year in line with the housing requirements set out in the London Plan, 7% more than the 2015 target and 70% more than the 2011 targets set out in the London Plan. The draft Local Plan has a positive approach to housing delivery on small sites, an emphasis on a design led approach to optimise housing capacity, and opportunities to create homes through estate regeneration.
- **LBW:** Identified capacity to meet and even slightly exceed the housing requirements set out in the London Plan for years 1-10 of the Local Plan period, however there is a shortfall identified over the 15-year period (noted some uncertainty over the longer-term). The capacity is substantially smaller than the local housing need figure.
- **LBM:** Merton have a 123% increase in housing target to 918 homes a year. For the first three to four years of the Merton Local Plan they are unlikely to meet the annual target of housing. Merton have identified sufficient housing sites to meet the 918 target over 15 years.
- **LBM:** Asked whether LBW would be able to help in providing some of their housing requirement in December 2019 and formally asked again if any assistance would be possible. LBW consider that, due to insufficient housing capacity, it is not possible for LBW to support LBM with their housing requirement.
- **LBW:** The Local Housing Need Assessment (LHNA) identifies a net need for 2,327 affordable rented and 1,248 affordable home ownership dwellings per annum to be provided over the plan period. The level of need is significant, and for that reason the proposed affordable housing policy (LP25) sets the aspiration to secure 50% of all new homes to be affordable, in line with the intent of the emerging London Plan. This will be informed further by the outcomes of a Whole Local Plan Viability Assessment and will be updating the Nine Elms Development Infrastructure Funding Study.
- **LBM:** The borough have challenges in delivering affordable housing through the planning system as historically +90% of planning applications for new homes are on small sites (less than 10 homes) which do not currently contribute to affordable housing, and will not be able to meet their need unless they can introduce a policy for small sites to contribute to affordable homes. The draft Local Plan therefore sets out a 50% overall target. Public sector sites should conform to the London Plan target of 50%, and for all other sites there is a target of up to 50% with a minimum of 40%, rather than the 35% set out in the emerging London Plan (for a threshold of 10 or more units). LBM are considering a scheme of 2-9 units providing a financial contribution (of up to 20%) rather than on-site. The approach has been viability tested (BNP Paribas) which found it to be 'ambitious' but with suitable flexibility.

d. *Gypsies & Travellers*

- **LBW:** The Council has a long-established Gypsy and Traveller site, which currently accommodates 11 residential pitches, one of which is vacant. The Gypsy and Traveller Accommodation Needs Assessment (2019), which was conducted in-house, found that there is no evidenced requirement or need for additional pitches to be provided on the existing site or elsewhere in the borough. If demand exceeds supply in the future, the Council will explore options to identify an additional site.
- **LBM:** Study conducted in 2012/2013 indicated that current and future needs could be met. LBM are looking to update this.

e. *Employment land*

- **LBW:** The updated [Employment Land and Premises Study \(2020\)](#) suggests there is demand for office floorspace (22,500 sqm) and industrial land (8.6ha) in excess of supply. The Draft Local Plan therefore takes a protective approach.
- **LBW:** Following the draft London Plan, Policy E5, LBW have designated 'Summerstown' as a SIL. This replaces the existing designation as a Locally Significant Industrial Area (LSIA); the borough equivalent of the LSIS. Co-location is not permitted in LSIA's in the draft Local Plan (re: Policy E7 of the draft London Plan).
- **LBM:** Merton have a large demand for industrial land, especially for workshops, food production and depots. Industrial land is now priced higher than residential land in some parts of the borough. Merton plan to protect the SILs. Co-location is not taking forward within industrial designations.
- **LBW:** The impact of the introduction on Class E threatens to undermine the Local Plan approach, as areas of protected land will now fall under this category (which allows COU and potentially will be subject to future PDR). This might have implications for the approach to co-location. LBW noted potential to re-engage AECOM (consultants on the ELPS study) to produce a statement on the validity of the draft approach / existing evidence in light of these changes. LBW agreed as an **action** to consider involving LBM if this work is to be commissioned.
- **LBW:** The draft Local Plan includes an affordable workspace policy seeking 10% of the economic floorspace as affordable provision (for schemes over 1,000 sqm). Within the Wandle Valley, this can be realised as a reduction

below market rent by 25% (an increase on the adopted position of 20%) or as managed workspace. This has not been viability tested, but will be looked at as part of the Whole Plan Viability Assessment. It may therefore be subject to review.

- **LBW:** Noted an appeal that was successful against the Council for a site on Penwith Road (Thornsett Road LSIA), which introduced residential and commercial uses within designated industrial land. The proximity to Earlsfield local centre was heavily weighed as a benefit for the introduction of other uses, as was the fact that intensified industrial uses were introduced. LBW shared details of the appeal (LBW's planning application numbers are 2018/1426 & 2019/1427, joint appeal).
- **LBM:** Highlighted an upcoming S106 project with cross boundary implications, which seeks to resolve a missing link along the Wandle Trail. It would be helpful if this could be identified within the Local Plan, and that the boroughs liaise to ensure the mapping is consistent. This should be taken forward as an **action**. LBW Officers have contacted LBM on this project already.
- **LBM:** There is an active group in north Wimbledon who are concerned about air quality in the Durnsford Road area resulting from industrial, waste management and HGV levels. Recommend Wandsworth have regard to it – will let Merton know if anything comes out of the Reg 18 consultation. Recorded as an **action**.

f. Town centres & retail / Transport and other infrastructure

- Both boroughs have sought to accommodate the introduction of the E Use Class within their plans with respect to town centres & appropriate uses, welcoming the flexibility that this brings. **LBM** will not seek to designate frontages anymore. **LBW** have retained these, and the current draft of the Local Plan specifies that conditions may be used to restrict uses, although it is noted that there have been different PINS decisions on the validity of this.
- **LBW:** The draft LP would seek to protect Tooting Markets as part of any development, including if regeneration around the centre result from Crossrail 2 (big if!). The London Plan has an opportunity area for Wimbledon, South Wimbledon and Colliers Wood, however this is based on Crossrail 2 and there is uncertainty given the status of that project. LBM are meeting with the GLA to discuss this.
- **LBM:** Colliers Wood isn't recognised as district centre in the London Plan but LBM intend to designate this area as a district centre and expect the area to come forward for redevelopment once existing retail leases have ended in the later 2020s. This is not considered to impact on Wandsworth's centres.
- **LBM:** Noted the emphasis on broadband infrastructure within the draft LP, but not considered to have cross-boundary implications for LBW.

g. Water and flooding

- **LBM** and **LBW** have a shared strategic flood risk assessment, part I of which has been agreed and part II of which is near to being finalised. There are no further cross-boundary issues due to this joint work.

h. Waste management

- **LBW:** Duty to Cooperate on waste is being led by the Council's waste consultant, Victoria Manning of Vitaka Consulting, who will deal with separately. The Waste Technical Study found there to be a shortfall of up to 2.1ha.
- **LBM:** Noted that they have a separate waste plan.

i. Climate change & energy

- **LBW:** Developed the Wandsworth Environmental and Sustainability Strategy (WESS). There is a significant focus on ensuring targets within this strategy are met. Achieve Zero Carbon by 2050 and Carbon neutrality as a council by 2030. This strategy is referenced within the Local Plan.
- **LBM:** There is significant political support for addressing climate change in the borough. Merton are going further than the London Plan and are introducing targets for minor developments. This has been tested for viability.
- **LBM:** Have worked with other boroughs on an assessment of the cost of carbon offsetting, and have raised the contribution from £90 to £300 per tonne. A stepped approach was considered by was rejected for being too complicated. **LBW** have followed the amount identified within the London Plan. The price of carbon is recognised as a potential cross-borough issue, as higher carbon targets in LBM might shift development across the border. LBM will contact LBW if this issue needs to be further looked at.

j. Community facilities (healthcare, education, community infrastructure)

- **LBW:** A revised Infrastructure Delivery Plan is being produced, and will be published with the Regulation 19 version of the Local Plan. It will be confirmed as part of this work, however it is understood that LBW can meet its own educational and health care needs through identified sites within the borough.

- **LBM:** Also consider that its education and healthcare needs can be met within the borough.
- Both boroughs are part of the South West London CCG, and therefore cooperate strategically in this regard.
- **LBW:** A new Arts and Culture Strategy is being produced.

k. *Natural environment*

- **LBM:** In Wimbledon Park, the lake is actually a reservoir (Council owned). A recent Environmental Agency inspection identified that the dam needs repairing. A planning application to resolve this is expected to be submitted within the coming weeks, and LBW will be contacted as part of this. This is recorded as an **action**.
- **LBM:** The draft Local Plan removes a small area of green space designation, however this is to correct an error in the mapping (the area in question has houses on it). This is not considered to raise any issues.
- **LBM:** The Officer responsible for green infrastructure expressed interest in posing questions on Wandsworth's Urban Greening Factor policy. Identified as an **action** if follow up is required.

l. *Historic environment & tall buildings*

- **LBW:** Commissioned the [Urban Design Study \(UDS\)](#) to develop a better understanding of the values, character and sensitivity of different parts of the borough. The UDS recommended revising the currently adopted tall buildings policy. The draft policy identifies a number of local definitions of "tall" (informed by the local prevailing height), and identifies broad locations across the borough where tall buildings may be appropriate.
- **LBW:** Several locations along the boundary have been identified as having 'opportunities for tall buildings within a local context'. Development proposals involving tall buildings will be assessed against the tall buildings criteria set out in the emerging London Plan, and additional Wandsworth-specific criteria listed in policy LP4 Tall Buildings. Although, tall buildings in these locations may impact on views from Merton, it is not considered that the impact would be unacceptable given that proposals will need to comply with the criteria set out in the policy. **LBM** will consider this as part of the review of the draft Local Plan, and LBW are happy to respond to any further questions on this (directed to Emil Ancewicz).
- **LBM:** Conducting a borough character study which will refer to tall buildings. The Local Plan currently has three main locations for taller buildings: Colliers Wood TC, Morden TC, and Wimbledon. Merton's taller building definition aligns with the London Plan. Within the Future of Wimbledon SPD there is a tall building heights map. Limits are not set, but there is guidance as to how each area will be assessed. In Colliers Wood and Morden a specific number of stories is not set, rather this is based on prevailing heights. There is currently a petition on the policy in Colliers Wood, which will therefore be looked at closely. Merton's Character Study has done some research in to areas suitable for taller buildings in the borough.

4. Statement of Common Ground

- **LBW** will be drafting a Statement of Common Ground. The intention is for this to be thematic, and to therefore only produce one for all parties to sign. LBW will share a draft with LBM once this has been written, in advance of the Reg 19 consultation.

5. AOB

Neighbourhood Planning

- **LBM:** A group are interested in proposing a neighbourhood plan for Wimbledon. The area identified on the website extends to the borough boundary with Wandsworth, and covers a substantial area of Merton borough. LBW will be notified if an application is forthcoming.
- **LBW:** The Tooting Broadway and Tooting Bec Neighbourhood Area has been designated, and it is understood that work is ongoing on developing a plan, although there has been no further discussions on this with the group. The Tooting Area Strategy draws upon evidence that was commissioned by the Neighbourhood Forum, and so it is hoped that this will be well received in the Reg 18 consultation.



Meeting Minutes

Partner
Westminster CC

Topic
Duty to Cooperate

Date
Friday, 15 January 2019

Location
MS Teams

Time
10:00 – 12:00

Meeting Attendees

Name	Organisation
Adam Hutchings (AH)	LB Wandsworth
Emil Ancewicz (EA)	LB Wandsworth
Alisha Levermore (AL)	LB Wandsworth
Robert Wellburn (RW)	LB Wandsworth
Kimberley West (KW)	Westminster CC
Michael Clarkson (MC)	Westminster CC

Actions

1. **LBW** to provide feedback on the online community engagement process in support of the Reg 18 Local Plan.
2. **LBW** and **WCC** to share the consultation responses on the Government's PDR proposals.

Agenda Items

1. Introductions
 2. Local Plan update
- **LBW** provided update on Regulation 18 'Pre-Publication' draft Local Plan. For more detailed information, please [the Council's website](#). Points of note raised:
 - The borough has commissioned an [Urban Design Study](#) for the first time as part of the Local Plan evidence base. This has been developed by Arup. The cost was significant – initially c. £80,000, but costs have risen and this will likely be closer to £100,000, however the borough are pleased with the draft report.
 - Most evidence was collected prior to the COVID-19 pandemic. While reference to this is made within the Plan, generally it is considered too early to adapt the approach to accommodate this. The longer-term impact will be kept under review, including to assess whether / when evidence-based documents need updating.
 - Public consultation on the Reg 18 draft LP will run until 1 March 2021. All documents are now available online with the exception of the HELAA. The interactive map is [now available](#). The consultation will be supported by events with 'seldom heard' groups, including young adults and estate residents. This is being led by a Public Practice Associate with an expertise in community engagement.
 - The ambition is to get the Regulation 19 to the September committee, and therefore to consult on this in the autumn 2021. The Plan will be submitted to PINS in spring 2022, and adoption hoped for in spring/summer 2023.
 - Two SPDs have been identified as emerging from / associated with the Plan: a Small Sites Development SPD; and an area-based SPD for the Wandle Delta. The latter will be published for February 2021 committee. Some of the content for the site allocations and the area strategy for Wandsworth Town will be amended to fit in with the objectives of this document.

- **WCC** provided an update on the Local Plan. Points of particular note raised:
 - The pandemic occurred following submission of the Local Plan. WCC took the position that the impacts of the pandemic cannot be understood fully at this stage. A request to pause the examination from some representatives was rejected by the Inspector, and the impact of pandemic was not addressed in the Inspector's MMs.
 - The revision of the UCO happened in advance of the hearing statements (c. 4 weeks). WCC revised the policies and submitted modifications to the inspector with a quick turnaround to ensure that policies were up to date.

3. Duty to Cooperate – strategic / cross-boundary issues:

- AH noted that Wandsworth did not think there would be any issues between Wandsworth and Westminster that would prevent us from taking the plan forward but welcomed any comment within this meeting and through the formal review of the Regulation 18 document.

a. Housing

- **LBW:** The Local Plan will aim to deliver at least 1,950 homes per year in line with the housing requirements set out in the London Plan, 7% more than the 2015 target and 70% more than the 2011 targets set out in the London Plan. The draft Local Plan has a positive approach to housing delivery on small sites, an emphasis on a design led approach to optimise housing capacity, and opportunities to create homes through estate regeneration.
- **LBW:** The draft Local Plan has a positive approach to housing delivery on small sites, an emphasis on a design led approach to optimise housing capacity, and opportunities to create homes through estate regeneration. Identified capacity to meet and even slightly exceed the housing requirements set out in the London Plan for years 1-10 of the Local Plan period. However, the capacity is substantially smaller than the local housing need figure.
- **LBW:** The Local Housing Need Assessment (LHNA) identifies a net need for 2,327 affordable rented and 1,248 affordable home ownership dwellings per annum to be provided over the plan period. The level of need is significant, and for that reason the proposed affordable housing policy (LP25) sets the aspiration to secure 50% of all new homes to be affordable, in line with the intent of the emerging London Plan. This will be informed further by the outcomes of a Whole Local Plan Viability Assessment and will be updating the Nine Elms Development Infrastructure Funding Study. **LBW** is changing the current stance on the proportion from 60/40 in favour of social rent to 50/50 social rent, intermediate. This is based on the notion that this will meet more of the boroughs residents rather than targeting a specific group.
- **WCC:** The Local Plan reverses their split from 60/40 to 40/60 in favour of intermediate on the basis that Westminster's demand for intermediate housing is very high. This went through the examination without problem based on the evidence put forward. WCC did a lot of bespoke modelling on housing need due to large transient population.
- **WCC** raised the question over first homes. **LBW** consider it unclear whether first homes would be included in intermediate or social rent homes. Given this, LBW will keep it under review.
- **LBW:** the draft LP will include a new policy which resists large scale co-living schemes, including the requirement for applicants to demonstrate the unsuitability of the site for conventional units. The criteria for this needs refinement with the next iteration of the Local Plan. **WCC** have a similar challenge with interest in student accommodation provision. Attempts to limit this to Westminster-based institutions were opposed by the GLA and student housing developers and ultimately rejected by the Inspector.
- It is not considered that the Local Plan leads to any strategic housing-related cross-boundary issues.

b. Gypsies & Travellers

- **LBW:** The Council has a long-established Gypsy and Traveller site, which currently accommodates 11 residential pitches, one of which is vacant. The Gypsy and Traveller Accommodation Needs Assessment (2019) found that there is no evidenced requirement or need for additional pitches to be provided on the existing site or elsewhere in the borough. If demand exceeds supply in the future, the Council will explore options to identify an additional site.
- **WCC:** Has no identified capacity or need for Gypsy and Traveller pitches. Noted that need should be strategically assessed by the Mayor at a London-wide scale.
- No strategic or cross-boundary issues identified.

c. Employment land

- **LBW:** The updated [Employment Land and Premises Study \(2020\)](#) suggests there is demand for office floorspace (22,500 sqm) and industrial land (8.6ha) in excess of supply. The Draft Local Plan therefore takes a protective approach.

- **LBW:** For offices, the draft Plan continues the approach established within the Employment and Industry Local Plan (2018), distinguishing between two office markets: the CAZ in Nine Elms and the local/ sub-regional market in the rest of the borough. Office intensification is promoted in part of the Battersea, Queenstown Road SIL, as part of the [Battersea Design and Tech Quarter](#) initiative. This is focused on creating a tech and creative industries hub which will build on investment in the Battersea Power Station development. Associated with this, the Plan proposes stronger affordable workspace requirements in the VNEB OA, of 50% less than market rent. This has not been viability tested. The provision of 'open (managed) workspace' is also acceptable instead of sub-market rents.
- **WCC:** Are developing guidance for developers on offering affordable workspace. Wandsworth's [Planning Obligations SPD](#) (adopted 2020) might provide a useful guide for this. While strengthening the affordable workspace requirements was considered by WCC, this has not been prioritised over affordable housing provision and the policy in Westminster's City Plan is therefore one of encouraging provision than requiring it.
- The challenges of protecting industrial uses that now fall under E Use Class was discussed. Both boroughs agreed that this would be exacerbated by proposed changes on PDR, and are therefore opposed to these in principle. However, it was also recognised that there is a need to be pragmatic in the consultation responses, identifying ways that this process could be improved (NB. this work is being led by a different party in LBW). It is positive to be aligned on this issue. The boroughs agreed to share the consultation responses once these have been drafted.

d. *Town centres & retail*

- Both boroughs have sought to accommodate the introduction of the E Use Class within their plans with respect to town centres & appropriate uses, welcoming the flexibility that this brings.
- **WCC** sought to include a policy criteria to allow the imposition of conditions limiting the use of a development where local criteria was met (e.g. the area is of strategic importance, etc). This was not accepted by the Inspector. As a result, it is recommended that very strong local evidence would be needed to justify such an approach, which **LBW** are also keen to implement in the Reg 18 draft Plan.
- It is helpful to continue to engage on this emergent issue, however it is not considered to result in any specific cross-borough issues.

e. *Transport and other infrastructure*

- **LBW:** The Draft Plan advocates support for the main ongoing infrastructure projects in the borough, including: the Northern Line Extension in Nine Elms; the Thames Tideway Tunnel; and Crossrail 2. For CR2, the Plan recognises that the project may not come forward, and therefore incorporates a 'fallback' option that major development sites – particularly in Clapham Junction – would still be suitable for redevelopment even without this infrastructure, albeit on a likely reduced scale.
- **WCC:** Work is being undertaken on the Victoria Place Plan which focuses on improvements to the public realm and pedestrian environment. It will feed into WCC's work on the site-specific allocations.
- The **LBW** Local Plan / Area Strategy for Nine Elms promotes the Nine Elms Pimlico Bridge, with the Kirtling Street area of Nine Elms identified as the preferred landing site on the south bank. This remains an identified ambition, although it is quite possible that the impact of the pandemic will make it unlikely within the timescales of the Local Plan. This was previously identified as an issue on which the boroughs do not agree. The political position in **WCC** is unchanged, and the idea is not supported. The policy in the Local Plan is unchanged from the draft version: it does not support new river crossings in principle unless there is an overarching strategic case. That notwithstanding, it was noted that some early community engagement has taken place on sites in Pimlico.
- The boroughs agreed to continue to liaise on this issue, particular if it is to be progressed. The disagreement with respect to ambitions for the bridge is noted.

f. *Water and waste management*

- **LBW:** Duty to Cooperate on waste is being led by the Council's waste consultant, Victoria Manning of Vitaka Consulting. She has confirmed that as there are no strategic waste exports to WCC, this is not considered a strategic or cross-boundary issue.
- **WCC:** Enquired about the value of a membership of a waste partnership. WCC are not currently in one but are exploring opportunities. There are no waste sites in the borough. **LBW** are in the Western Riverside Waste Management Area partnership. This is a product less of planning, but of contractual agreements to send waste to the Smuggler's Way waste transfer facility.

g. *Climate change, flooding & energy*

- **LBW:** There is a revised flooding policy. All town centres need a buffer zone of 400 sqm to allow for passing the sequential test.
- **LBW:** Developed the Wandsworth Environmental and Sustainability Strategy (WESS). There is a significant focus on ensuring targets within this strategy are met. Achieve Zero Carbon by 2050 and Carbon neutrality as a council by 2030.
- No strategic or cross-boundary issues identified.

h. Community facilities (healthcare, education, community infrastructure)

- **LBW:** A revised Infrastructure Delivery Plan is being produced, and will be published with the Regulation 19 version of the Local Plan. It will be confirmed as part of this work, however it is understood that LBW can meet its own educational and health care needs through identified sites within the borough.
- **LBW:** A new Arts and Culture Strategy is being produced.
- **WCC:** A revised Infrastructure Delivery Plan has been produced and will be published shortly. It will be used to inform early discussions on site-specific policy within the Site Allocations document.
- No strategic or cross-boundary issues identified.

i. Natural environment

- Not discussed in detail. There are not considered to be any strategic or cross-boundary issues.

j. Historic environment & tall buildings

- **LBW:** Commissioned the Urban Design Study (UDS) to develop a better understanding of the values, character and sensitivity of different parts of the borough. The UDS recommended revising the currently adopted tall buildings policy. The draft policy identifies a number of local definitions of “tall” (informed by the local prevailing height), and identifies broad locations across the borough where tall buildings may be appropriate.
- **LBW:** The northern part of the Nine Elms Opportunity Area has been identified as having the opportunity for a cluster of tall buildings. Any proposals for tall buildings in that area will continue to be assessed in the line with the VNEB (Vauxhall, Nine Elms, Battersea) Tall Buildings Strategy. In all cases, development proposals involving tall buildings will be assessed with the tall buildings criteria set out in London Plan, and additional Wandsworth-specific criteria listed in the proposed tall buildings policy.
- **WCC:** The tall buildings policy is similar to the planned Wandsworth approach, and does not set maximum heights. This was raised at examination due to objections from developers and landowners, who want both flexibility and certainty with respect to heights. WCC conducted a building heights study which looked at the heights appropriate in principle for different areas, using some high-level modelling. The Policy says that there is not one set maximum for height but instead a contextual approach, which gives broad guidance to developers and the Council. WCC were not asked to make many changes to that policy in the Inspector’s MMs.
- The UNESCO Westminster World Heritage Site was identified as being of cross-borough importance. As a stakeholder borough, **LBW** will continue to protect the UNESCO Westminster World Heritage site and this is stated within the Local Plan. **WCC** confirmed support for this. There is an upcoming WHS steering group workshop in February.

4. Statement of Common Ground

- **LBW** will be drafting a Statement of Common Ground. The intention is for this to be thematic, and to therefore only produce one for all parties to sign. LBW will share a draft with WCC once this has been written, in advance of the Reg 19 consultation.
- **WCC’s** SoCG was identified as a good example. WCC only had bilateral SoCG with boroughs where this was requested (LB Lambeth).

5. AOB

- None identified.

Meeting Minutes

Partner
Greater London Authority

Topic
Duty to Cooperate

Date
Monday, 22 February 2021

Location
MS Teams

Time
15:00 – 17:30

Meeting Attendees

Name	Organisation
Adam Hutchings	LB Wandsworth
Emil Ancewicz	LB Wandsworth
Robert Wellburn	LB Wandsworth
Eoghan McConville	LB Wandsworth
Lara Goldstein	Greater London Authority
Hassan Ahmed	Greater London Authority

Agenda Items

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

- **GLA** provided an update on the Local Plan. Points of note:
 - The London Plan is to be published on 2 March 2021. The policies therefore carry full weight from this date forward.
 - The Mayor has produced nine [Recovery Missions](#), which have particular regard to the CAZ and the Opportunity Areas. LBW should take account of these.
 - Consulted recently on various guidance supporting the London Plan (finished 15 January, now in the process of consolidating responses), including on:
 - Good Quality Homes for all Londoners
 - Public London Charter
 - Circular Economy Statement
 - Whole Life-Cycle Carbon Assessments
 - Energy Planning Guidance
 - There will be consultation on further guidance in the future – stay tuned!

2. Duty to Cooperate – strategic issues:

a. Housing

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

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

b. Built & historic environment, including tall buildings

- **LBW:** Commissioned the [Urban Design Study \(UDS\)](#) to develop a better understanding of the values, character and sensitivity of different parts of the borough. The study identified 7 high level places and 21-character areas in the borough. This guidance has been embedded in the area strategies for different parts of the borough. The UDS recommended revising the currently adopted tall buildings policy. The draft policy identifies a number of local definitions of "tall" (informed by the local prevailing height) and identifies broad locations across the borough where tall buildings may be appropriate. There are three types of tall building zones: opportunity for tall building clusters, opportunities for tall buildings in town centres, opportunity for tall buildings within a local context. Maximum heights are not set, and heights set out within Table 23.1 therefore relate to local definitions of what constitutes a tall building (effectively the threshold for when the policy applies). The Secretary of State's Direction to the Mayor requiring that the minimum definition of tall buildings should not be less than 6 storeys or 18 metres impacts on recommended local definitions of tall within the UDS, based on prevailing heights (i.e. up to 5 storeys).
- **GLA:** The approach to defining 'tall buildings' for specific localities and the associated mapping is welcomed. The SoS Direction will require the approach set out in the draft Plan to be revised, as this is now a potential issue of non-conformity. With respect to locations for tall buildings, there are concerns that Part D.2. of Policy LP4 could provide a loophole for proposals to come forward for tall buildings in any locations in the borough.
- **GLA:** Would prefer to see **LBW** setting out maximum heights within the policy in order to create certainty for the LPA and developers, as set out within line Policy D9 Part B.2.
- **LBW:** The policy on the historic environment seeks to preserve the significance of the historic environment and is considered unlikely to cause any cross-boundary issues.
- **GLA:** Recommended that **LBW** include reference to the Westminster WHS within the Tall Buildings policy (LP4) and potentially as a distinct heritage policy. **LBW** noted that Historic England had accepted the Local Plan as it is currently set out with respect to this issue. The Plan also seeks to avoid cross-referencing policies, however an inclusion within the supporting text could be made. Historic England are close to publishing their revised Advice Note on Tall Buildings, and therefore references to this will need to be made within the Local Plan.

c. *Employment land*

- **GLA:** The Local Plan is founded on positive work in establishing the level of demand that is anticipated over the Plan period, as set out within the updated [Employment Land and Premises Study \(2020\)](#). This document suggests there is demand for office floorspace (22,500 sqm) and industrial land (8.6ha) in excess of supply.
- **GLA:** There is a potential issue of non-conformity with the principle of co-location within the Battersea, Queenstown Road SIL (as the Battersea Design & Technology Quarter), which is not supported by the London Plan (Policy E7.B). There is recognition that the intention of this designation is to realise industrial intensification within this location, however, should this option continue to be pursued, then it would need to be done through a process of SIL consolidation and release. Replacement SIL would therefore need to be identified. Further, the principle of vertical co-location, as advocated within the BDTQ, is less preferable than horizontal co-location of different uses. In the latter form of development, it is generally easier to mitigate potential issues between uses (industrial and other).
- **LBW:** The proposal to encourage co-location within the Battersea Design & Technology Quarter / part of the Queenstown Road, Battersea SIL is predicated on investment that is occurring to the north of this site (development and transportation facilities). As such, it is considered to be a more attractive and suitable location for this form of development, rather than permitting co-location in the majority of our LSIA's. The Summerstown LSIA is being proposed as SIL within the draft Local Plan, in line with the PLP. This has previously been identified as a LSIA, and therefore its designation would represent an uplift of the amount of SIL land within the borough in the draft Plan compared with the adopted Local Plan. Interested whether this would constitute substitution in line with the London Plan requirements. This should be considered in greater detail with Giorgio Wetzl (GLA).
- **GLA:** It would be helpful for the LBW to consider, in collaboration with the Mayor (GW and HA), whether certain logistics, industrial and related functions in selected parts of SIL or LSIA's could be intensified to provide additional industrial capacity. This should form an additional piece of evidence base work to support the Local Plan. The draft Plan policies and Site Allocations provide indications of where additional industrial capacity is expected to come forward or could be potentially delivered via industrial intensification over the Plan's period. The draft Plan Policy LP37 and supporting text provide a clear framework setting out the role that strategic reservoir of industrial land (SILs and LSIA's) and industrial land and premises in other locations (including EUIAs, EUPAs, Focal Points of Activities, etc) could have in meeting identified demand for industrial and related uses. However, with the exception of proposals for the BDTQ and some Site Allocations, the draft Plan includes few details on the amount of additional industrial floorspace (and ha-equivalent) that could be delivered in specific locations over the Plan period. It would be helpful to clearly present in the Plan how the identified industrial demand could be met across Wandsworth's industrial and other locations. This could be set out in a schedule providing details on expected and potential gains and losses of industrial capacity (both in terms of floorspace and land-equivalent) across specific locations and sites, highlighting how these cumulatively would ensure that identified industrial and related demand to 2034 is adequately met. These additional details would provide further certainty and ensure that the draft Plan's strategy would be effective in meeting identified demand for industrial and related functions, as well as providing clarity for development management purposes.

d. *Waste management*

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

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

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

f. *Town centres & retail*

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

3. Statement of Common Ground

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

4. AOB

Duty to Cooperate Meeting Minutes

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

Meeting Attendees

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

Agenda Items

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

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

b. Tall buildings policy

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

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

c. Historic Environment policy

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

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

4. Statement of Common Ground

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

5. AOB

- None identified.



Meeting Agenda

Partner Transport for London	Topic Duty to Cooperate	
Date Friday, 5 February 2021	Location MS Teams	Time 10:00 – 11:00

Meeting Attendees

Name (Organisation)	
Richard Carr (TfL)	Emil Ancewicz (LB Wandsworth)
Adam Hutchings (LB Wandsworth)	Eoghan McConville (LB Wandsworth)
Alisha Levermore (LB Wandsworth)	Andrew Flood (LB Wandsworth)
Robert Wellburn (LB Wandsworth)	

Actions

- A. RC to circulate Crossrail 2 project update. Completed on 05/02/21.
- B. RW to liaise with Lara Goldstein (GLA) to see if helpful for RC to join for part of the meeting with the GLA on 22/2/21. Completed on 10/2/21.

Agenda Items

1. Introductions
2. Local Plan update
 - a. Overview and current stage
 - The current review is a full review of the Local Plan, and will therefore consolidate and update our Core Strategy, Development Management Plan, and Site Specific Allocations documents (2016), as well as our Employment and Industry document (2018), which superseded those policies.
 - The Draft Local Plan seeks to concentrate growth in the centres identified in the Plan's nine Area Strategies. Growth will be particularly targeted to the VNEB OA (Nine Elms), Wandsworth Town and the Wandle Delta, and Clapham Junction (including the York Road / Winstanley Estate), and consequently these are the focus of our site allocations / masterplanning.
 - LBW sought to understand the impact of COVID-19 on the longer-term growth models that are used by the GLA / TfL. RC noted that the GLA (and by extension TfL) will continue to operate on the existing assumptions until otherwise informed by the data.
 - Most evidence was collected prior to the COVID-19 pandemic. While reference to this is made within the Plan, generally it is considered too early to adapt the approach to accommodate the impacts of this. The longer-term impact will be kept under review, including to assess whether / when evidence-based documents need updating.
 - Public consultation on the Reg 18 draft LP will run until 1 March 2021. All documents are now available online. An interactive map is available. There is ambition to undertake more engagement than normally / statutorily required. Following an in-person event in Jan 2020, we will be hosting events with 'seldom heard' groups, including young adults and estate residents. This is being led by a Public Practice Associate with an expertise in community engagement.

- The ambition is to get the Regulation 19 to the September committee, and therefore to consult on this in the autumn 2021. The Plan will be submitted to PINS in spring 2022, and adoption hoped for in spring/summer 2023.

b. Draft policies on transportation

- **LP 51 Sustainable Transport:** TfL consider the emphasis on Healthy Streets to be positive. It would be useful to frame this in the context of the Mayor's other targets (Vision Zero, etc). These are currently embedded within the LIP and so drawing this connection within the Local Plan should be possible.
- **LP 52 Transport and Development:** Not considered to be a contentious policy.
- **LP 53 Parking, Servicing and Car Free Development:**
 - RC notes that there is a point of difference between the London Plan and the draft Local Plan, as the latter requires car free development in PTAL 5 whereas the former sets car free as the maximum parking provision in inner London areas with PTAL 4. Opportunity Areas are also assumed to be car free in the London Plan; is this sufficiently clear? The Local Plan should further clarify that part B of the policy referencing table 10.3 of the London Plan only applies to residential development and that part C requires parking provision for retail and town centre uses in line with the London Plan. Some flexibility may exist where there are specific operational requirements for parking, but this should be justified on a site by site basis. LBW Officers will respond to this point formally as part of the Regulation 18 response.
 - Cycle parking is welcomed. RC encouraged LBW to consider whether there are instances in which the borough might exceed the London Plan with respect to improved quantum and/or quality. It is also noted that TfL do not consider cycle hire to be a substitute for cycle parking, which is identified in the supporting text.
- **LP 54 Public Transport and Infrastructure:** TfL consider it to be very positive to see references to the safeguarding of transportation land.

c. Site allocations / Area Strategies

- **General:** RC noted that it would be helpful for the Local Plan to include separate references / identifiers for the development considerations and design requirements listed for each site allocation. A consistent and clear approach to transport-related criteria is encouraged (e.g. the Plan currently references items such as 'Movement', 'Active Travel', etc). Stronger language should be used in these criteria than in the draft version (e.g. stronger than "Consideration should be given to...").
- **Wandsworth:** TfL welcome the strong support for the gyratory redevelopment, however noted that the implementation date is likely to be delayed from 2024 to 2025 because of COVID. This should be confirmed.
- **Nine Elms:** The AS seeks to ensure that Battersea Park Station is able to cater for a future extension of the London Overground. This is welcome by TfL however it is noted there are no plans to do so.
- **Nine Elms:** It is a key priority for TfL that the Battersea Bus Depot is retained or re-provided. The isolated nature of the site makes this an ideal location for transportation function. This is heightened as the coaches that used to use New Covent Garden have started using this. RW confirmed this is the intention of the BDTQ designation.

3. Statement of Common Ground

4. Infrastructure Delivery Plan & Capital Programme

- **Crossrail 2:** Development work has been put on pause, but safeguarding should continue to be pursued. Updates to the safeguarding areas are expected to be ready for the Reg 19 version of the Local Plan. RC to circulate a project update as an **action**. LBW noted that the Local Plan takes the position that development should be able to come forward (in particular in Clapham Junction) with or without Crossrail 2, however this will be required to take account of the safeguarded areas. TfL would not wish to prevent development from coming forward in line with this.
- **South London & Heathrow Link:** General preference of both TfL and LBW is to retain flexibility in reference to this project such that a decision can be taken at a later date on specifics.
- **Pedestrian Cycling Links:** TfL can provide policy support and technical assistance, however there is no funding available for capital works.

- **Other Funding:** TfL have a funding settlement until March, at which point it will need to be renewed. For planning, it is assumed that all but CR2 will go ahead, however there may be delays to timescales. Match funding will continue where there is a strong business case (e.g. for proposals such as step-free access to a station).

5. AOB

- RW to liaise with Lara Goldstein (GLA) to see if helpful for RC to join for part of the meeting with the GLA on 22/2/21, noting there is some crossover between the GLA and TfL in Nine Elms. Recorded as an **action**.

For more information write to:
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