

Statement of Common Ground Between

London Borough of Wandsworth and

London Boroughs of Hammersmith and
Fulham, Lambeth, Merton, Richmond,
Westminster City Council and the Royal
Boroughs of Kensington and Chelsea and
Kingston Upon Thames.

8 September 2022

Executive Summary

- 1.1. A Statement of Common Ground (SCG) is a written record of the progress made by strategic policy-making authorities during the process of planning for cross-boundary matters. This SCG has been prepared to demonstrate that Wandsworth's draft Local Plan is '*based on effective joint working on cross-boundary strategic matters*', in accordance with the requirements of paragraph 27 of the National Planning Policy Framework (NPPF) and the Planning Practice Guidance chapter on Maintaining Effective Co-operation.
- 1.2. This SCG focuses on strategic cross-boundary matters being addressed and progress in cooperating to address them. It also forms part of the evidence demonstrating compliance with the 'duty to cooperate'. In the London context, most strategic issues beyond borough boundaries (e.g. housing targets, major growth areas, etc.) are largely addressed by the London Plan.
- 1.3. This SCG does not preclude individual boroughs producing their own Statements of Common Ground covering a different geography and/or issues in support of their own plans. Updates to this document will be agreed as matters progress and agreement is reached on any outstanding issues. It therefore includes details on mechanisms for review and updating. It forms part of the evidence to demonstrate compliance with the 'duty to cooperate'. The document is intended to be 'live', updated as circumstances change, and agreement occurs on any outstanding issues.
- 1.4. The Wandsworth Local Plan (Regulation 19) was submitted to the Secretary of State on 29 April 2022.

2. Parties Involved

- 2.1. This SCG will address strategic spatial policies to be addressed directly by collaboration with the relevant Local Planning Authorities. The London Boroughs listed below have been included as they are immediately adjacent to the London Borough of Wandsworth (LBW). The Council is engaged with them on strategic matters on an on-going basis.
- 2.2. This SCG has been prepared by Wandsworth Council in agreement with the following parties:
 - London Borough of Hammersmith and Fulham
 - Royal Borough of Kensington and Chelsea
 - Royal Borough of Kingston upon Thames
 - London Borough of Lambeth
 - London Borough of Merton
 - London Borough of Richmond upon Thames
 - Westminster City Council

- 2.3. LB Wandsworth and LB Lambeth are signatories to a bilateral Statement of Common Ground (December 2019) in respect of the Lambeth Local Plan. This Statement of Common Ground 2022 is not intended to fully supersede the 2019 document, instead, it is intended to be read and applied alongside it. The agreements made in the 2019 Statement are listed in Appendix One with a corresponding number. References to these agreements are made in the text of this Statement for cross referencing purposes (denoted 'LBL-XX')¹. Whilst the essence of the 2019 Statement remains relevant, some changes in context and circumstance (such as the adoption of both the London Plan and the Lambeth Local Plan) mean that some updating is required.
- 2.4. In addition, LB Merton has **agreed** a Statement of Common Ground with LB Wandsworth for the purposes of their own emerging Local Plan (January 2022). Because of the similar timescales, this document is intended to be consistent with the content of that agreement.

¹ The following agreements are not specifically referenced, but remain in place unchanged: LBL-18, LBL-33, LBL-34

3. Signatories

London Borough of Wandsworth agree to matters referred to in this document which directly impact them, as outlined in the 'Strategic Matters' section.

Signed: Jenifer Jackson



Position: Assistant Director of Environment and Community Services (Planning & Transport Strategy)

Date: 15/08/22

London Borough of Hammersmith and Fulham agree to matters referred to in this document which directly impact them, as outlined in the 'Strategic Matters' section.

Signed: Matt Patterson



Position: Head of Spatial Planning

Date: 15/08/22

Royal Borough of Kensington and Chelsea agree to matters referred to in this document which directly impact them, as outlined in the 'Strategic Matters' section.

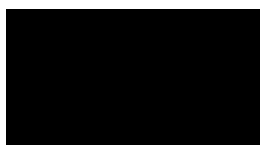
Signed: J.C. *Wade* Jonathan Wade

Position: Head of Spatial Planning

Date: 18/08/2022

Royal Borough of Kingston upon Thames agree to matters referred to in this document which directly impact them, as outlined in the 'Strategic Matters' section.


Signed: Cllr Roger Hayes



Position: Portfolio Holder for Planning Policy and Community Engagement.

Date: 02/09/22

London Borough of Lambeth agree to matters referred to in this document which directly impact them, as outlined in the 'Strategic Matters' section.

Signed: 

Position: Director of Planning, Transport and Sustainability

Date: 26/08/22

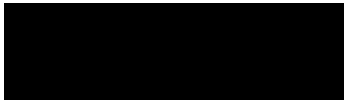
London Borough of Merton agree to matters referred to in this document which directly impact them, as outlined in the 'Strategic Matters' section.

Signed: Tara Butler 

Position: Deputy Future Merton Manager

Date: 08/09/22

London Borough of Richmond Upon Thames agree to matters referred to in this document which directly impact them, as outlined in the 'Strategic Matters' section.

Signed: Andrea Kitzberger-Smith 

Position: Spatial Planning and Design Team Manager

Date: 15/08/22

Westminster City Council agree to matters referred to in this document which directly impact them, as outlined in the 'Strategic Matters' section.

Signed: 

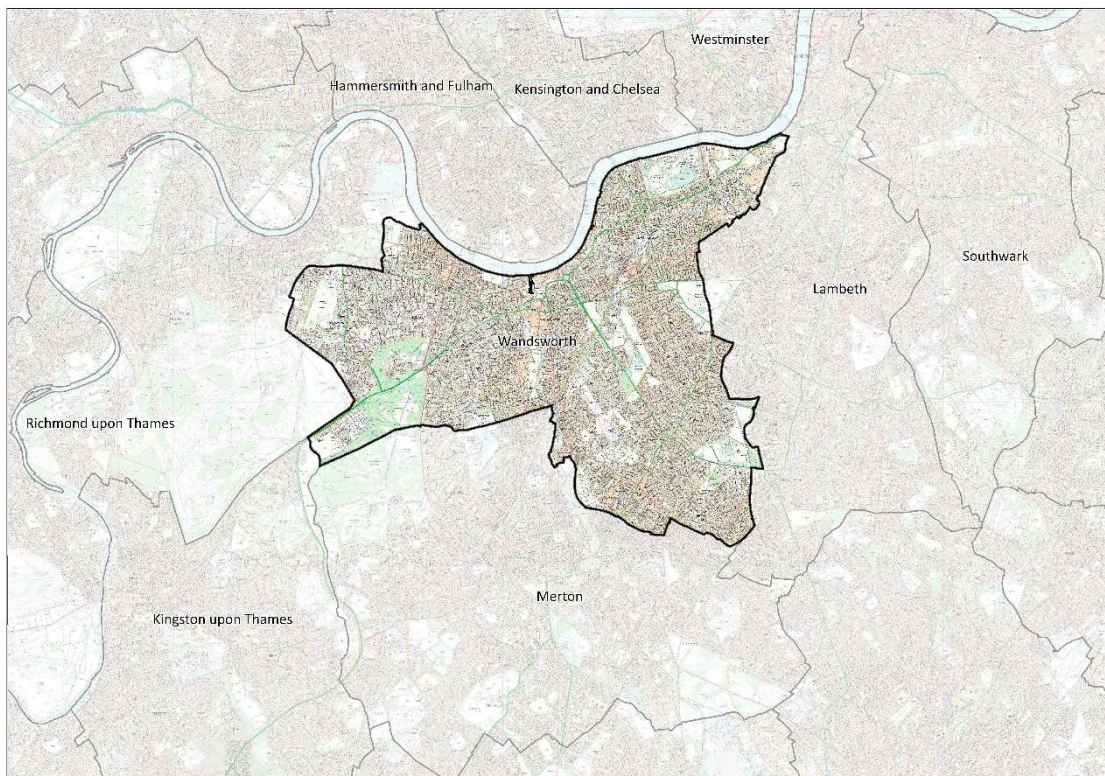
Position: Cabinet Member for Planning and Economic Development

Date: 22/08/22

4. Strategic Geography

- 4.1. This section sets out the factual position regarding cross boundary matters.
- 4.2. 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**.
- 4.3. The area shown in Map 1 has been identified as the strategic planning area for the purposes of the SCG. 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



The London Plan

- 4.4. Within the wider London context, collaboration on many strategic issues that go beyond borough boundaries are addressed through the London Plan.
- 4.5. The London Plan is the spatial development strategy for London, produced by the Greater London Authority on behalf of the Mayor of London. The current plan was adopted in March 2021. Every London borough local plan must be in general conformity with the

published London Plan. Together, the policies in the London Plan and in each borough's Local Plan constitute the statutory local development plan for that borough, along with any neighbourhood development plans, once made. In a London context, collaboration on many strategic issues – such as the distribution of housing, identification of major growth areas, strategic infrastructure etc – are largely addressed through the London Plan, and the formal and informal arrangements that exist between boroughs to enable this to happen.

Strategic Agencies and Authorities in London

- 4.6. Transport for London (TfL) is the integrated transport authority responsible for the implementation of the Mayor's Transport Strategy (2018). The Strategy uses the 'Healthy Streets Approach', making health and personal experience the priority in planning the city. The Healthy Streets Approach is applied to the whole transport system to help create:
 - a. Healthy streets and healthy people
 - b. A good public transport experience
 - c. New homes and jobs
- 4.7. The boroughs are required to work with TfL to support the implementation of the Mayor's Transport Strategy.
- 4.8. TfL runs the day-to-day operation of the city's public transport network (including London Buses, London Underground and Overground, Docklands Light Railway, TfL Rail and London Trams). Network Rail own, operate and develop London's rail infrastructure (to become Great British Railways from 2023).
- 4.9. The All London Green Grid (ALGG) partnership is recognised by DEFRA as the Local Nature Partnership for London. The partnership does not yet have a governance structure that allows it to respond on matters of local plan consultations. ALGG aims to promote and protect green and blue infrastructure (including rivers) in London. There are three areas in Wandsworth (the Arcadian Thames, Wandle Valley and Central London) and each area framework includes sections of the River Thames and/or River Wandle. Development on the riverside should have regard to the aims of the ALGG and the opportunities identified in the area frameworks.
- 4.10. Thames Water is the statutory water and sewerage undertaker for the area and is hence a specific consultation body in accordance with the Town & Country Planning (Local Development) Regulations 2012. Thames Water are helping to deliver the Thames Tideway Tunnel project which will be a new fifteen mile-long 'super sewer' running under the River Thames. Due for completion in 2024, the sewer will replace London's 150-year-old sewer network and prevent tens of millions of tonnes of sewage from polluting the River Thames every year. Wandsworth has six large construction sites the Thames Tideway Tunnel, including its main shaft site located in the riverside area of Kirtling Street, Nine Elms. The sites will be transformed into new public open spaces, including new promontories in the Thames at Putney embankment and Nine Elms (Heathwall Pumping Station), and opening up new areas of riverside walk in Nine Elms.

LB Wandsworth

- 4.11. LB Wandsworth is an inner London borough of around 35km² with a northern boundary on the River Thames between Nine Elms and Putney. Centred around Wandsworth Town and the Wandle Valley, the borough includes within it the town centres at Tooting, Balham, Clapham Junction, Wandsworth and Putney and the commons at Clapham, Tooting, Wandsworth and Putney / Wimbledon. It shares significant boundaries with adjacent boroughs – **Lambeth** to the east (10km boundary), **Merton** to the south (10km) and **Richmond** the west (8km). A relatively short boundary (c. 600m) exists with the **Royal Borough of Kingston-upon-Thames** in the south-west of the borough at Putney Vale.
- 4.12. Across the River Thames, Wandsworth shares a boundary with **Hammersmith and Fulham** (Putney to Battersea), **Kensington and Chelsea** (Battersea to Chelsea Bridge) and **Westminster** (Chelsea Bridge to Nine Elms). Eight bridges link the south to the north bank.

LB Lambeth

- 4.13. Lambeth is an inner London borough to the east of Wandsworth. Important cross boundary issues exist in the Vauxhall and Nine Elms area (Vauxhall Nine Elms Battersea Opportunity Area, estate regeneration), through Clapham (Clapham Common and Clapham South local centre) through to Tooting and Streatham. The boundary with Lambeth is perhaps the most complex, given the urban nature of the boundary moving towards central London and along the River Thames. Lambeth and Wandsworth were signatories to a bilateral Statement of Common Ground (December 2019)² in respect of the Lambeth Local Plan proposed submission version (2020). The signed bilateral Statement of Common Ground sets out cross boundary strategic matters between Lambeth and Wandsworth, and recorded areas of agreement or disagreement on these matters.

LB Merton

- 4.14. Merton is an outer London borough of around 37 km² situated to the south of Wandsworth. It borders Croydon, Sutton, Kingston-upon-Thames and shares a small border with Lambeth. Key cross boundary issues between Merton and Wandsworth include the role and function of the Wandle Valley and the value of employment and industrial land uses in this area, travel routes between the two boroughs and beyond, the provision of acute healthcare by St. George's Hospital located in Wandsworth that serves south London and other healthcare needs by NHS South West London Clinical Commissioning Group³ across six boroughs (including Merton and Wandsworth) and the management of Wimbledon Park, which is separated by the borough boundary. The All England Lawn Tennis Club is just within Merton, adjacent to Wimbledon Park and the AFC Wimbledon Stadium lies just within Merton, to the south of Garrett Business Park Strategic Industrial Location in Wandsworth.

LB Richmond-upon-Thames

² https://www.lambeth.gov.uk/sites/default/files/pl_Lambeth_Wandsworth_SCG_Dec_2019_0.pdf

³ NHS South West London Clinical Commissioning Group was abolished on 1 July 2022 and its functions were transferred to a new organisation, NHS South West London Integrated Care Board.

- 4.15. Richmond is an outer London borough to the west of Wandsworth. Richmond and Wandsworth have a formal shared services agreement, which means the two Councils have a very close functional relationship, although retain their sovereignty and separate governance arrangements. Cross boundary planning issues relate to transportation and the provision of local services, alongside the relationship between neighbourhoods and the surrounding commons and open land.

LB Kingston

- 4.16. Kingston is an outer London borough with a limited physical boundary with Wandsworth at Putney Vale within Putney Heath.

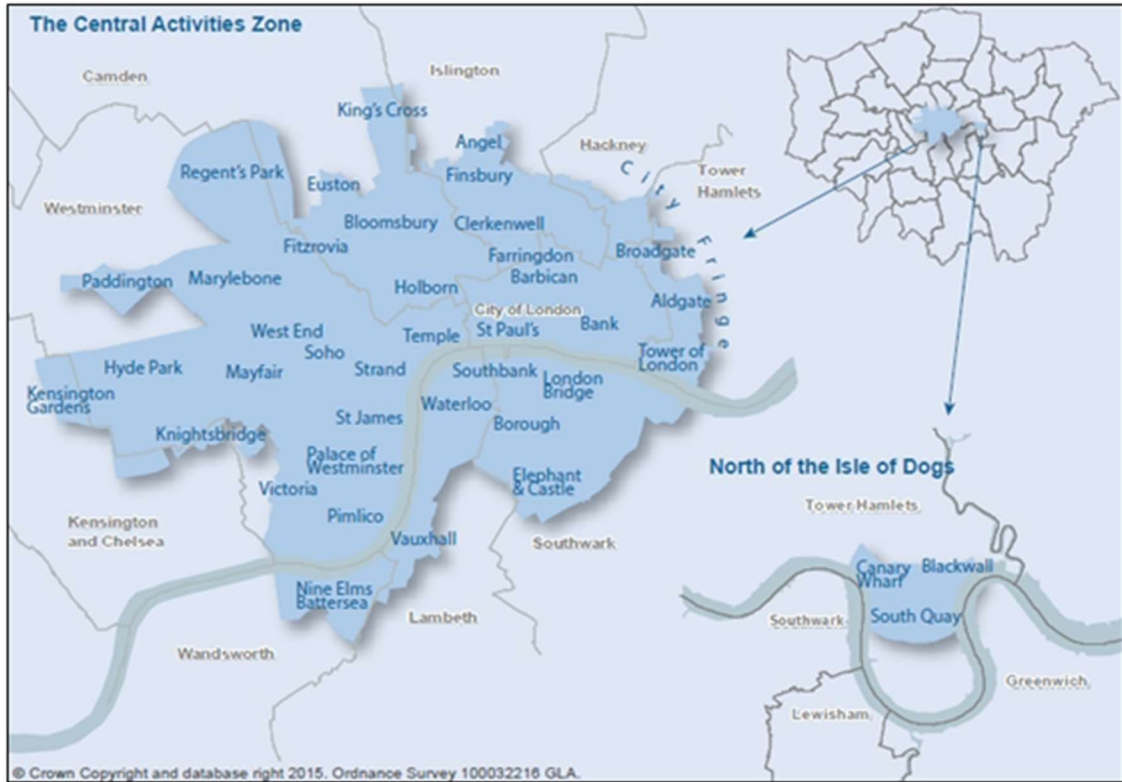
LB Hammersmith and Fulham, RB Kensington and Chelsea, Westminster City Council

- 4.17. Hammersmith and Fulham, Kensington and Chelsea and Westminster are all inner London boroughs located north of Wandsworth across the River Thames, and therefore share a boundary along the Thames. The cross boundary issues relate principally to river issues, including connections over and across the river and strategic and local views associated with proposed development, riverside landmarks and features.

Shared Planning Matters

Central Activities Zone

- 4.18. The London Plan identifies a large area of central London as the Central Activities Zone (CAZ), recognising its contribution to the country's economy and the concentration of businesses, services and other activities taking place within it. The London Plan protects this area in recognition of the agglomeration that results in exceptional productivity and national benefits, which warrants a different or tailored approach to the application of national policy to address its distinct circumstances.



4.19. The CAZ area encompasses the Vauxhall, Nine Elms and Battersea Opportunity Area (VNEB OA) within Wandsworth, and also includes the north of **Lambeth**, and Pimlico to the north, into **Westminster**. The aims and objectives for the CAZ, as expressed in the London Plan, are interpreted within Local Plans by constituent boroughs to ensure conformity with the London Plan.

4.20. **Kensington and Chelsea** also has areas of the borough within the CAZ, though these areas do not share a boundary with Wandsworth.

Opportunity Areas

4.21. The London Plan identifies areas that will see the most significant change. These are known as Opportunity Areas (OAs). Many OAs are already seeing significant development and have the potential to deliver a substantial amount of the new homes and jobs. There are two Opportunity Areas within Wandsworth.

4.22. The Vauxhall, Nine Elms and Battersea Opportunity Area (VNEB OA) crosses the border between Wandsworth and **Lambeth**. The London Plan states that the VNEB OA has the potential to deliver greater levels of housing alongside employment than the other CAZ Opportunity Areas. In these areas, offices and other CAZ strategic functions may be given equal weight relative to new residential development. Most of the VNEB OA lies within the borough of Wandsworth. The Wandsworth portion of the VNEB OA is further connected to both **Lambeth** and Central London by the new underground stations on the Northern Line. The original masterplan set out two new centres to serve this new neighbourhood and beyond: a major new centre at Battersea Power Station and smaller centre in **Lambeth** at

Vauxhall. The Vauxhall Central Activities Zone (CAZ) retail cluster is identified in both the London Plan 2021 and the Lambeth Local Plan 2021.

- 4.23. The Plan identifies the redevelopment of Clapham Junction Station as a key driver for growth and change. Improvement of the passenger experience by reconfiguration and modernisation of the station is needed. The Clapham Junction Opportunity Area has been identified to capitalise on both the longer term objectives which would be brought about through the planned Crossrail 2 route through Clapham Junction railway station, and shorter term objectives including the improvements to the station interchange and nearby mixed use development and regeneration opportunities which would allow for a co-ordinated approach for future development. This gives rise to the opportunity to improve the use of land around the station, contributing to the role of Clapham Junction as a major town centre. Crossrail 2 is currently on hold, though its development clearly has cross boundary issues for Wandsworth along its route. In the shorter term the Plan identifies the requirement to produce a masterplan to facilitate the delivery of improvements to the station and new development in advance the potential future implementation of Crossrail 2. The OA, however, is entirely within Wandsworth and similar cross boundary issues are not anticipated.
- 4.24. The London Plan 2021 identifies the Wimbledon – South Wimbledon – Colliers Wood Opportunity Area. Merton’s draft Local Plan 2022 proposes the Wimbledon – South Wimbledon – Colliers Wood Opportunity Area. This borders Wandsworth to the north (Durnsford Road Strategic Industrial Location in Merton) with the River Wandle acting as the borough boundary. Both boroughs **agree** there are no cross boundary issues identified.

Strategic Areas for Regeneration

- 4.25. As outlined by London Plan policy SD10, there are parts of London where the impacts of inequality and causes of deprivation are particularly concentrated. Based on the Index of Multiple Deprivation (IMD), many of the city's neighbourhoods lie within the 20 per cent most deprived areas in England. The London Plan identifies these neighbourhoods as Strategic Areas for Regeneration (SARS).
- 4.26. Wandsworth has a close relationship with SARS defined in **Lambeth** close to the borough boundary (South Lambeth Estate, Streatham Park). Wandsworth also has SARS defined in Roehampton adjacent to the boundary with **Richmond**. **Westminster** and **Kensington and Chelsea** have riverside SARS that address the river boundary with Wandsworth, the former including areas that would be within the scope of a landing point for a new river crossing. The London Plan 2021 identifies a SARS in Merton around the Phipps Bridge, Pollards Hill and Mitcham town centre, some distance from the Wandsworth borough boundary. Cross boundary issues are not identified.

Housing Market Area

- 4.27. Housing need is a strategic issue dealt with at the regional level in London by the Mayor in the London plan. Through their own local plans, authorities must plan to meet or exceed their London Plan target to ensure general conformity with it. A Housing Needs Assessment

is made for Wandsworth on a regular basis as part of the Local Plan evidence base. Whilst Greater London is considered to be the strategic housing market area for the purposes of the London Plan and its SHLAA, the more detailed assessment at a local level identifies five sub-regional areas (North, East, West, South and Central). Wandsworth is identified within the South area along with immediate neighbours, **Kingston, Merton, Richmond** and nearby boroughs of Sutton and Croydon.

Town and Local Centres

- 4.28. The London Plan identifies a hierarchy of the city's larger town centres, recognising the different size, draw and function of them. The Wandsworth Local Plan identifies five town centres – Wandsworth Town, Putney, Balham, Clapham Junction and Tooting – and beneath this it also identifies local centres and important local parades within the borough (The London Plan identifies Battersea Power Station as a future CAZ retail cluster).
- 4.29. Between boroughs, town centres and parades can be shared by virtue of them crossing the borough boundary. There are two instances of this in Wandsworth, as follows:
- Lavender Hill / Queenstown Road district centre (**Lambeth**)
 - Clapham South local centre (**Lambeth**)

Neighbourhood Planning

- 4.30. There is one designated neighbourhood planning area in Wandsworth. The designated Tooting Bec and Broadway Neighbourhood Area lies on the boundary with **Merton**, and includes two **Lambeth** owned cemeteries (Streatham Cemetery and Lambeth Cemetery).
- 4.31. In July 2015, **Lambeth** approved the designation of the Kennington, Oval and Vauxhall Neighbourhood Area and Neighbourhood Forum. In June 2021, Lambeth approved the redesignation of Kennington, Oval and Vauxhall (KOV) Neighbourhood Forum. The KOV neighbourhood area shares a boundary with Wandsworth at Nine Elms. An application for a neighbourhood forum area in Wimbledon (**Merton**) was refused in July 2021 but is likely to emerge again. This area would have had a boundary with Wandsworth and, at Lambeth Cemetery, a boundary with the Tooting Bec and Broadway Neighbourhood Forum. **Richmond** and **Kingston** do not have neighbourhood forums abutting Wandsworth's boundary.
- 4.32. Across the River Thames, **Westminster** has approved a neighbourhood forum and area in Pimlico (which excludes Churchill Gardens), and this Forum has submitted its Regulation 16 Plan (April 2021). This forum has a boundary with Wandsworth. The plan makes reference to the proposed river bridge crossing to Nine Elms at Policy PIM20. Further neighbourhood areas without a designated forum in Westminster bordering Wandsworth are Churchill Gardens and Ebury Bridge. **Hammersmith and Fulham** and **Kensington and Chelsea** have no neighbourhood forums abutting the borough boundary. However, Kensington and Chelsea Council has received an application to designate a Neighbourhood Area in the south-west of the borough. This 'Lots Road Village' Neighbourhood Area would run right up to the

northern bank of the River Thames. A decision whether or not to designate is likely to be made by September 2022.

Transport

4.33. Main roads that cross the border between Wandsworth and surrounding boroughs:

London Distributor Road:

- A216 (Mitcham Lane) (**Lambeth** – Wandsworth – **Merton**)
- A3036 (Lavender Hill/ Wandsworth Road) (**Lambeth** – Wandsworth)

TfL Road Network:

- A214 (Tooting Bec Road) (**Lambeth** – Wandsworth)
- A24 (Balham Hill) (**Lambeth** – Wandsworth – **Merton**)
- A205 (The Avenue) (**Lambeth** – Wandsworth – **Richmond**)
- A3 (Long Road) (**Lambeth** – Wandsworth – **Kingston**)
- A3205 (Nine Elms Lane) (**Lambeth** – Wandsworth)
- A217 (London Road) (**Merton** – Wandsworth – **Hammersmith and Fulham**)
- A218 (Durnsford Road) (**Merton** – Wandsworth)
- A219 (Wimbledon Park Side / Putney High Street) (**Merton** – Wandsworth – **Hammersmith and Fulham**)
- A3220 (Battersea Bridge Road) (**Kensington and Chelsea** – Wandsworth)
- A3216 (Chelsea Bridge Road) (**Kensington and Chelsea** – Wandsworth)

Overground rail lines that cross the border between Wandsworth and surrounding boroughs:

- Vauxhall – Queenstown Road (South Western) (**Lambeth**)
- Streatham Hill – Balham (Southern) (**Lambeth**)
- Streatham Common – Balham (Southern) (**Lambeth**)
- Imperial Wharf – Clapham Junction – Wandsworth Road (London Overground) (**Hammersmith and Fulham** – Wandsworth – **Lambeth**)
- Earlsfield – Wimbledon (South Western) (**Merton**)
- Putney – Barnes (South Western) (**Richmond**)
- Victoria – Battersea Park (Southern) (**Westminster**)
- Wimbledon loop (Central London – Streatham (Lambeth) – Tooting (Wandsworth) – Haydon's Road, Wimbledon, South Merton, Morden South (Merton) – Sutton

Underground rail lines that cross border between Wandsworth and surrounding boroughs::

- Northern Line (**Lambeth, Merton**)
- District Line (**Hammersmith and Fulham** and **Merton**)

Flooding / Critical Drainage Areas

(a) Flood Risk

4.34. The National Planning Policy Framework¹ (NPPF) and associated Planning Practice Guidance for Flood Risk and Coastal Change (PPG) set out the active role Local Planning Authorities

(LPAs) should take to ensure that flood risk is understood and managed effectively and sustainably throughout all stages of the planning process. The NPPF outlines that Local Plans should be supported by a Strategic Flood Risk Assessment (SFRA) and LPAs should use the findings to inform strategic land use planning. Merton and Wandsworth Councils have produced an updated joint Level 1 (November 2020) and Level 2 (February 2021) Strategic Flood Risk Assessment (SFRA).

- 4.35. The Level 1 Merton and Wandsworth SFRA has collated and analysed the most up to date available flood risk data for all sources of flooding to provide an overview of flood risk across the study area. This has been used by both councils to inform the preparation of their Local Plans, including the application of the Sequential Test to site allocations.

The key updates to this revised Level 1 SFRA (2020) include:

- River Wandle Climate Change Modelling (August 2017)
- Online Flood Risk Mapping (to Support the Level 1 SFRA)
- Areas at risk of perched groundwater
- Further commentary on areas to safeguard for flood risk management, the cumulative impact of development, and opportunities to reduce the causes and impacts of flooding.

- 4.36. There are three fluvial flood zones as defined by the Environment Agency (EA); Flood Zone 1, 2 and 3. These areas have been defined following a national scale modelling project for the EA and are regularly updated using recorded flood extents and local detailed modelling. The flood zones are based on the likelihood of an area flooding, with Flood Zone 1 areas least likely to flood and Flood Zone 3 areas more likely to flood. The map below shows the flood extents that cross adjoining boundaries.

Flood Zones 1, 2 & 3



- 4.37. The Thames Barrier is managed and maintained by the Environment Agency and protects 125 square kilometres of central London from flooding caused by tidal surges. The Thames tidal defences also includes tidal walls and embankments along the banks of the River Thames. Should they fail or become breached, the areas most at risk of flooding would be in the north of the borough, but this could also impact on the surrounding neighbourhoods. The Environment Agency holds tidal breach modelling. This is also detailed within Wandsworth's Strategic Flooding Risk Assessment (2020) Level 1 and 2.
- 4.38. In 2019 the Environment Agency started its first full review and update of the Thames Estuary 2100 Plan (2012). The Plan sets out the measures that require implementing to maintain adequate flood risk protection from the River Thames by the year 2100. Wandsworth is identified within Action Zone 1 (West London). The Plan outlines a number of recommendations to mitigate flood risk within the Central Zone, including to maintain, enhance or replace, the river defence walls and active structures through central London over the 25 years of the plan from 2012 to 2035, and then 2035 to 2050. Within the West Zone, the Plan outlines several recommendations including to agree a programme for putting in place within 25 years, alternative measures for managing fluvial flood risk in the west London tidal area. The Plan advises that by 2065, the existing flood defences of the river wall will need to be raised by 0.5m and a further 0.5 by 2100.

(b) Critical Drainage Areas

- 4.39. A Critical Drainage Area is a discrete geographic area (usually a hydrological catchment) where multiple and interlinked sources of flood risk (surface water, groundwater, sewer, main river and/or tidal) cause flooding in one or more Local Flood Risk Zones during severe weather thereby affecting people, property of local infrastructure.
- 4.40. 11 CDAs were identified across the borough as part of the Surface Water Management Plan.

| CDA ID | CDA Name | CDA ID | CDA Name |
|------------|---------------------|------------|------------------------|
| Group7_014 | Putney Heath | Group7_020 | South Balham |
| Group7_015 | King Georges Park | Group7_021 | Clapham Junction South |
| Group7_016 | Trinity Road | Group7_022 | Clapham Junction |
| Group7_017 | St Georges Hospital | Group7_023 | Lavender Hill |
| Group7_018 | Summerstown | Group7_024 | Tooting Bec |

Provision of energy (including heat)

- 4.41. The London Plan states that boroughs should engage at an early stage with relevant energy companies and bodies to establish the future energy and infrastructure requirements arising from large-scale development proposals within London (see Policy SI3, Energy Infrastructure). It states that development plans should identify the need, and suitable sites for, any necessary infrastructure requirements such as energy centres, energy storage and upgrades to existing infrastructure. Development plans should also identify existing, and propose locations for, heating and cooling networks.
- 4.42. The Mayor has established the London Heat Map as a tool to help this process, and has identified Heat Network Priority Areas, which can be used to where the heat density is sufficient for heat networks to provide a competitive solution for heat provision. Wandsworth is included within a Heat Network Priority Area with central **Richmond**, northern **Merton** and **Lambeth**. The Heat Map identifies the proposed Heat Network within the VNEB Opportunity Area, which seeks to extend into neighbouring **Lambeth** and **Westminster**.

Green infrastructure

- 4.43. Metropolitan Open Land that abuts or crosses the borough boundary into surrounding boroughs:
- Clapham Common (**Lambeth**)
 - Tooting Bec and Graveney Commons (**Lambeth**)
 - Lambeth Cemetery (**Merton**)
 - Wimbledon Park (**Merton**)
 - Wimbledon Common and Putney Heath (**Kingston** and **Merton**)

- Roehampton Club / Bank of England Sports Ground (**Richmond**)
- Putney Lower Common (**Richmond**)

4.44. Wimbledon Park is also a defined Historic Park and Garden, and Wimbledon Common is a Special Area of Conservation and Site of Special Scientific Interest. With the exception of Wimbledon Park, each of these sites also holds a designation or protection for their biodiversity interest.

4.45. Leader’s Gardens (**Richmond**) and Heathbrook Park (**Lambeth**) are larger protected open spaces lying on or across the borough boundaries.

River Thames

4.46. Sites of Nature Conservation Importance and Sites of Metropolitan Nature Importance that cross the borough boundary between the neighbouring boroughs include:

- River Thames
- River Thames and Tidal Tributaries Metropolitan SINIC

4.47. The Thames runs along the northern boundary of Wandsworth, and interacts with **all neighbouring boroughs with the exception of Merton and Kingston**. There are river services on the Thames for both passengers and freight, and Wandsworth has a number of safeguarded wharves that enable river transport⁴. The London Plan encourages the designation and maintenance of Thames Policy Areas, and defines these at Policy SI14 (and diagrammatically at Figure 9.7). Within Wandsworth, there are two defined areas – Hampton to Wandsworth and Wandsworth to Bermondsey – which require joint working with the relevant neighbouring authorities.

4.48. Wandsworth is one of four London boroughs (along with **Hammersmith & Fulham, Lambeth and Kensington & Chelsea**) for which the Western Riverside Waste Authority (WRWA) is the statutory waste disposal authority for household waste. A thirty year Waste Management Service Agreement (WMSA) was established between WRWA and Cory Environmental Ltd to dispose of WRWA waste, commencing in October 2002 and ending in 2032. Household recyclables are managed at a Materials Recovery Facility (MRF) at Smugglers’ Wharf, Wandsworth. Residual (“black bag”) waste is taken to Cringle Dock Transfer Station in Wandsworth and then transported down river to the Belvedere energy recovery facility in the London Borough of Bexley.

4.49. In addition to Wandsworth’s protected wharves (Cringle Dock, Pier Wharf, Middle Wharf, Smuggler’s Way Wharf, Kirtling Wharf), **Kensington and Chelsea** and **Hammersmith and Fulham** have protected wharves at Cremorne Wharf, Hurlingham Wharf, Compley’s Wharf and Swedish Wharf.

Views, heritage, design and conservation

(a) Westminster World Heritage Site

⁴ See LBL-50 and LBL-51.

- 4.50. Wandsworth is a stakeholder borough, along with adjacent boroughs, to reflect its role in protecting and, where possible, enhancing the Outstanding Universal Value of the Westminster World Heritage Site (the Palace of Westminster and Westminster Abbey, including St Margaret’s Church) and its setting. Both **Lambeth** and Wandsworth boroughs participate in the Westminster World Heritage Site Steering Group whereby they **agree** to work collaboratively with **Westminster** to protect the setting of the World Heritage Site.
- 4.51. The Vauxhall, Nine Elms, Battersea Opportunity Area Planning Framework (OAPF) sets out a tall buildings strategy which supports the emerging cluster at Nine Elms and Battersea. It establishes a series of parameters, which respond to the need to protect the setting of the Palace of Westminster World Heritage Site from key river prospects including Waterloo, Hungerford and Westminster Bridges. The adopted World Heritage Site Management Plan (and any future iteration) and the preservation and enhancement of important views, including identified local views from Westminster, will be a material consideration when assessing development proposals.
- 4.52. *(b) Strategic and local views*
- 4.53. Wandsworth borough contains one strategically important linear view defined in the London Plan (Policy HC3) between King Henry VIII’s Mound (**Richmond**) and St. Paul’s Cathedral. The view crosses Wandsworth in the north-western corner of the borough over Roehampton and West Putney from adjoining **Richmond** and into **Hammersmith and Fulham**.
- 4.54. Six views are defined in the adopted Local Views supplementary planning document, and each of these has implications for neighbouring boroughs:
- View 1: upstream from Putney Bridge (focused on Putney Riverside towards **Richmond** borough)
 - View 2: downstream from Battersea Bridge (focused on Albert Bridge towards Nine Elms and **Lambeth** borough)
 - View 3: downstream from Albert Bridge (focused on the setting of Battersea Park towards Nine Elms and **Lambeth** borough)
 - View 4: Battersea Power Station from Chelsea Bridge (focused on Battersea Power Station to Nine Elms and **Lambeth** borough from **Kensington and Chelsea** borough)
 - View 5: Queenstown Road to Battersea Power Station (focused on Battersea Power Station towards **Westminster**)
 - View 6: Battersea Power Station from Battersea Park (focused on Battersea Power Station towards Nine Elms and **Lambeth** borough)
- 4.55. Locally valued views and vistas are defined in Wandsworth’s Urban Design Study (2021). Of cross boundary significance are:

- those from the US Embassy in Nine Elms towards and across the river (to **Westminster**);
- from Grosvenor Road (**Westminster**) towards Battersea Power Station and the Nine Elms riverside;
- downstream from Fulham Railway Bridge towards Wandsworth and the northern riverbank (**Hammersmith and Fulham**);
- from Richmond Park (**Richmond**) towards Mount Clare, Roehampton;
- upstream from the mouth of the Wandle (**Hammersmith and Fulham, Richmond**).

4.56. **Lambeth** has defined the following local views into Wandsworth:

- County Hall (LV 4): County Hall to Palace of Westminster - Wandsworth is not the focus of the view but the periphery;
- Battersea Power Station (LV 9): St George Wharf Pier to Battersea Power Station - The viewer is looking upstream towards Battersea Power Station. The River Thames largely occupies the foreground of the view;
- Brixton Historic Towers (LV 18): Brockwell Park to Lambeth Historic Towers - this view from Brockwell Park. Wandsworth forms the distant backdrop;
- Brixton Panoramic (LV 19): Battersea Park to The Gherkin and Canary Wharf - the view from Brockwell Park to the city is a broad panorama that ranges westwards across the very northern part of Wandsworth (from Battersea Power Station northward). Wandsworth is not the focus of the view but the periphery with the glimpses of the Power Station being the only feature within Wandsworth of note;
- Streatham Common (LV 20): Streatham Common to Rosehill, Pollards Hill, and Morden - Wandsworth is not the focus of the view but the periphery.

4.57. A number of conservation areas in Wandsworth cross the boundary of, or have a border with, surrounding boroughs:

- Clapham Common (Wandsworth), which abuts Clapham CA (**Lambeth**);
- Garrads Road (Wandsworth) which abuts Streatham Park and Garrads Road CA (**Lambeth**);
- Old Devonshire Road (Wandsworth) which abuts La Retraite CA (**Lambeth**);
- Parktown Estate (**Lambeth**);
- Dinsmore Road (**Lambeth**);
- Wimbledon North (Wandsworth) which abuts Wimbledon North (**Merton**);
- Bathgate Road (Wandsworth) which abuts Bathgate Road CA (**Merton**);
- Alton (Wandsworth) which abuts Richmond Park (**Richmond**);
- Dover House (**Richmond**);
- West Putney (**Richmond**);
- Landford Road (**Richmond**);
- Putney Lower Common (**Richmond**);
- Putney Embankment (**Richmond**);
- Battersea Square (river boundary with **Hammersmith and Fulham**);
- Battersea Park (river boundary with **Kensington and Chelsea**).

4.58. Additionally, a number of conservation areas within neighbouring authorities are on or are in close proximity to the borough boundary with Wandsworth:

- Albert Embankment (**Lambeth**, on boundary);

- Clapham (**Lambeth**, on boundary);
 - Oaklands Estate (**Lambeth**, close proximity);
 - Wandsworth Road (**Lambeth**, close proximity);
 - La Retrait (**Lambeth**, on boundary)
 - Hyde Farm (**Lambeth**, on boundary);
 - Streatham Park and Garrads Road (**Lambeth**, on boundary)
 - Kingston Vale (**Kingston**).
- 4.59 There are a number of historic parks and gardens that share a boundary with Wandsworth. Wimbledon Park is a Grade II listed Historic Park and Garden, currently on the Historic England “at risk” register. The northern part of Wimbledon Park is within Wandsworth, with the majority across the boundary to the south, in **Merton**. The landscaping to Alton West Estate shares a boundary with Richmond Park (**Richmond**), both Historic Parks and Gardens. Putney Vale Cemetery is wholly within Wandsworth, but close to the boundary with **Richmond** and **Kingston**.
- 4.60 Along the river, Bishop’s Park and Fulham Palace are located across from the Putney Riverside on the Fulham Riverside and Wandsworth Park has a river fronting edge, meaning all of these Historic Parks and Gardens are close to the **Hammersmith and Fulham / Wandsworth** boundary. Similarly, Cheyne Walk, Roper’s Garden, Chelsea Physic Garden, Chelsea Hospital (all **Kensington and Chelsea**) and Battersea Park (Wandsworth) have river fronting edges between these boroughs. Churchill Gardens and Pimlico Gardens / St. George’s Square have river fronting edges within **Westminster**.
- 4.61 Historic England have defined Archaeological Priority Areas (APA) within London, and these areas are generally large in scale and cross boundaries. Without exception, all of the surrounding boroughs share archaeological priority areas with Wandsworth, focused on the River Thames and River Wandle, Stane Street and Putney Heath (generally Tier 2).
- 4.62 Archaeological priority areas in Lambeth adjoining Wandsworth are as follows:
- North Lambeth APA2
 - Roman Road APA3
 - Streatham APA15
- 4.63 Archaeological priority areas in Wandsworth adjoining Lambeth are as follows:
- Battersea Channel APA
 - Clapham Common APA
 - Stane Street APA
 - Tooting Common APA
- 4.64 In **Richmond**, the GLAAS review of APAs and move to a ‘tiered’ system is underway, and will ensure a consistent approach to areas which are most significant and sensitive to change, including Richmond Park, and recent evidence discovered at the Thames Tideway Tunnel Barn Elms of an early settlement.

5. Strategic Matters

- 5.1. This section documents key strategic matters covered in Wandsworth Local Plan that are considered to be of cross-boundary significance arising from the potential impacts of the Local Plan Review. It summarises where agreement has or has not been reached with relevant key partners to which the issue relates. It is founded within the need to demonstrate, ‘effective joint working on cross boundary strategic matters’ (NPPF, para. 35) and uses the list of issues set out at NPPF para. 20 as a starting point for determining what constitutes a strategic matter. The Duty to Co-operate Statement identifies where these strategic matters have been discussed amongst the neighbouring authorities who are party to this SCG, and where they are of importance.
- 5.2. The cross-boundary impacts of borough policies in neighbouring authorities’ local plans will be addressed through separate SCG produced by the relevant local authority.
- 5.3. Wandsworth’s Duty to Co-operate Statement provides further details of how the Wandsworth Local Plan has been informed by ongoing engagement with key partners, including those that are not party to this SCG.

5.4. *London Plan designations*

Central Activities Zone

- 5.5. The continued commercial success of the Central Activities Zone, which covers the northern extent of Wandsworth and crosses into **Westminster** and **Lambeth**, is vital to London’s world city status. Supported by the Mayor of London, all parties have introduced Article 4 Directions within their portion of the CAZ to protect central London’s strategically important office supply against change of use to residential use under permitted development rights, and have also consulted on further Article 4 Directions in respect of changes from Class E (commercial, business and service uses) to Class C3 (dwelling houses) within the CAZ.
- All parties **agree** to work collaboratively to deliver the Published London Plan approach to the CAZ and consult each other on major applications with potential strategic cross border impacts⁵.
- 5.6. **Lambeth’s** adopted policy ED14 proposes to introduce a new policy to manage any further visitor accommodation in Vauxhall within the boundary of the Central Activities Zone, whilst policy H3 manages change of use of permanent residential accommodation to short-term holiday lets. Wandsworth’s draft Local Plan includes equivalent policies at LP46 and LP25 respectively⁶.

Vauxhall, Nine Elms Battersea Opportunity Area

⁵ Updates LBL-5

⁶ See LBL-6

- 5.7. The VNEB Opportunity Area is identified in the London Plan as overseen by the Nine Elms Vauxhall Strategy Board, a partnership of key stakeholders in the area including landowners, TfL and the GLA, co-chaired by the Leaders of both **Lambeth** and Wandsworth. The Board oversees the development of the OA and meets twice a year to review overall progress and manage strategic risks.
- 5.8. **Lambeth** and Wandsworth **agree** to work collaboratively through the VNEB Strategy Board to deliver the housing and employment targets and any other strategic matters affecting VNEB, and **agree** to work collaboratively to deliver the infrastructure identified via the Nine Elms DIRR study, where it is identified as having cross-borough implications⁷.

Strategic Areas for Regeneration

- 5.9. In respect of the closer relationship between Wandsworth borough and the SARS at South Lambeth Estate and Streatham Park, the existing agreements between Lambeth and Wandsworth will continue⁸.

Housing

Housing Delivery and affordable housing

- 5.10. The delivery of new and affordable housing is one of the largest strategic issues London faces. Through the London Plan and in line with Planning Practice Guidance⁹, the Mayor of London sets housing targets for each local planning authority, based on evidence of housing need and development capacity across the capital. Through their own local plans, authorities must then plan to meet or exceed London Plan targets to ensure they are in general conformity with the London Plan.
- 5.11. The analysis in Wandsworth’s [Local Housing Need Assessment](#) (GL Hearn, 2020) demonstrates that the borough has an on-going relationship with those boroughs that make up the London South West Sub-Regional housing market, which was as defined in the 2012 Wandsworth Strategic Housing Market Assessment.
- 5.12. The Local Plan will seek to deliver at least 1,950 homes per year, in line with the housing requirement set out in the London Plan. There is identified capacity to meet this requirement for the first ten years of the Local Plan period. In accordance with the London Plan, the Local Plan identifies a requirement for the entire Plan period and capacity to meet this target, acknowledging that the London Plan target will change once it is updated within around 5 years’ time, with these requirements to be included in a future revision to the Local Plan . The Local Plan housing target is lower than the objectively assessed local housing need, however a comprehensive review of land and sites available for development (including large, small and windfall sites) indicated that there is insufficient capacity to meet the objectively assessed local housing need. All options have been thoroughly explored with regards to meeting as much of the objectively assessed housing need as possible.

⁷ See LBL-7 and LBL-8

⁸ See LBL-11 and LBL-12

⁹ Paragraph: 034 Reference ID: 2a-034-20191216

- 5.13. All local planning authorities that are part of this SCG have fed into the London Plan figures – either expressing their support or objection to the new figures, based on a localised understanding of development capacity.
- **Westminster, Lambeth, Richmond, Hammersmith and Fulham and Kensington and Chelsea** all **agree** that they can meet or exceed the total numerical housing target assigned to them by the Mayor of London in the London Plan, within their own borders. While **Richmond** suggested it is noted as a strategic matter, it is recognised it is subject to ongoing monitoring and liaison between authorities.
 - **Kingston** acknowledges the housing target set in the London Plan.
 - In 2019, during the drafting of the London Plan, when the draft London Plan target for Merton proposed as 13,280 homes per decade, Merton asked if Wandsworth if they could assist with their housing requirement. Wandsworth stated that they were unable to assist due to insufficient housing capacity. However, Merton can now meet its 10 year target within its own borders so this is no longer considered to be a cross boundary issue.
- 5.14. Wandsworth’s 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 (LP23, Reg.19 version) sets the aspiration to secure 50% of all new homes to be affordable, in line with the intent of the London Plan.
- 5.15. The new Local Plan will seek to deliver a range of housing types, including Build to Rent, housing for students and the elderly. It **agreed between all parties** that none of these forms of accommodation, or the provision of affordable homes, leads to strategic cross-boundary issues with the neighbouring boroughs¹⁰.

Gypsies and Travellers

- 5.16. Wandsworth has a long-established Traveller site, which currently accommodates 11 residential pitches, one of which is vacant. The Gypsy and Traveller Accommodation Needs Assessment (2019, updated 2022) found that there is no evidenced requirement or need for additional pitches to be provided on the existing site or elsewhere in the borough. If demand exceeds supply in the future, the Council will actively explore options to identify an additional site, in accordance with the Policy LP32 (Traveller Accommodation).
- 5.17. This strategic matter has not been identified as a cross-boundary issue with **Hammersmith and Fulham, Kensington and Chelsea, Merton, Richmond** or **Westminster**. It is **agreed** that each can accommodate their own needs for gypsy and traveller accommodation.
- 5.18. There is an identified need for Gypsies and Travellers accommodation that **Kingston** consider they are unable to meet. While **Wandsworth** are able to meet their own need (one site), the Council does not have the flexibility to assist **Kingston** in this regard due to lack of additional capacity.

¹⁰ See also LBL-2.

- 5.19. Since the bi-lateral SCG between Lambeth and Wandsworth was signed in 2019 both the London Plan 2021 and the Lambeth Plan 2021 have been adopted. The Published London Plan now commits the Mayor to a London-wide gypsy and traveller accommodation needs assessment and LBL-3 should be read in this context. Policy H10 of the adopted Lambeth Plan confirms that Lambeth can meet its needs within its own administrative boundary for the Plan period.

Employment land

- 5.20. **Wandsworth** updated the Employment Land and Premises Study (ELPS) in 2020, which suggests there is demand for office floorspace (22,500 sqm) and industrial and waste land (up to 8.6ha) in excess of supply. It is noted that the ELPS is based on economic forecasting data derived from before the pandemic, and the impact upon changes in work patterns is likely to have a significant impact on office, and other commercial and industrial, floorspace. The Local Plan therefore takes a protective approach.
- 5.21. The draft Wandsworth Local Plan continues the approach of the Local Plan Employment and Industry Document (EID, 2018), in that it distinguishes between two office markets: the CAZ in Nine Elms and the local / sub-regional market in the rest of the borough. It also promotes the concept of the Battersea Design and Technology Quarter (BDTQ), located south of Battersea Power Station in Queenstown Road / Battersea Strategic Industrial Location (SIL). In addition:
- **Lambeth** considered the area of SIL being proposed for the BDQT and made no further comments relating to it;
 - In line with London Plan Policy E5, Wandsworth have designated ‘Summerstown’ as SIL in the draft Local Plan. This area of employment activity straddles the boundary with **Merton**. This replaces the previous designation as a Locally Significant Industrial Area (LSIA); the borough equivalent of the Locally Significant Industrial Sites (LSIS) in the London Plan. **Merton** highlight that they have a high demand for industrial land and plan to protect the SIL sites within their borough, and are therefore supportive of this approach;
 - Both **Hammersmith and Fulham** and **Kingston** advised Wandsworth of their evidence base, which seeks to detail impacts of COVID-19 on office space. Wandsworth **agreed** to keep this under consideration;
 - Potential challenges of protecting office space/industrial land in the context of existing and future changes to Permitted Development Rights (PDR) is noted by **Wandsworth, Westminster, Hammersmith and Fulham** and **Kensington and Chelsea**. Possible use of Article 4 Directions were discussed with **Kensington and Chelsea**. Boroughs **agreed** to keep each other updated following recent Government consultations on this matter, and their subsequent introduction of new PDR. This is also made possible through strategy meetings with the Greater London Authority (GLA).
 - Following the introduction of PDR to allow changes of use from Class E to Class C3, authorities have introduced Article 4 Directions to limit this, with co-ordination having taken place between boroughs (particularly **Westminster, Lambeth, Richmond** and **Kensington and Chelsea**) and through regular meetings chaired by the GLA. Wandsworth and **Lambeth** shared information about their proposed Article 4 Directions, and acknowledge a differing approach in respect of the shared

centre at Clapham South and Lavender Hill. Some of these Article 4 Directions remain subject to notification by the Department for Levelling Up, Housing and Communities, whilst others have been confirmed and / or modified¹¹.

Affordable Workspace

- 5.22. The draft Local Plan includes an affordable workspace policy seeking contributions to affordable, flexible and managed workspace. Developments of over 1,000 sqm must provide either a proportion of ‘open workspace’ equivalent to 10% of the gross economic floorspace, or a proportion of economic floorspace at an affordable rent below market rent, in perpetuity, subject to scheme viability. This is spatially differentiated between sites in the VNEB Opportunity Area and the remainder of the borough.
- 5.23. This strategic matter has not been identified as a cross-boundary issue with **Hammersmith and Fulham, Kensington and Chelsea, Merton, Kingston, Richmond, Lambeth, or Westminster**.

Town centres and retail

- 5.24. **Wandsworth** updated the Retail Needs Assessment in 2020, and it 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 Local Plan period. It should be noted that this study was based on data largely dating from before the Coronavirus pandemic.
- 5.25. The Local Plan sets out a new approach to retail in response to legislative changes (particularly in respect of the new Class E), but maintains a hierarchical town centre approach as a preferred strategy despite new changes to permitted development from Class E to Class C3 that could undermine both town centres and such an approach.
- 5.26. This strategic matter has not been identified as a cross-boundary issue with **Hammersmith and Fulham, Kensington and Chelsea, Kingston, Richmond or Westminster**, but there are the following shared matters that have been raised through the Duty to Co-operate:

Lambeth:

- The Wandsworth Draft Local Plan takes a stronger approach to out of centre development than in the adopted Plan, with previous exemptions for smaller units no longer applicable, and the sequential test now applicable in designated Focal Points of Activity. This is consistent with the recommendation made in the **Lambeth’s** Issues Document response. Further queries were posed by **Lambeth** in their representations made on the Regulation 18 Local Plan regarding the efficacy of the approach to town centre uses in out-of-centre location within the VNEB OA, and the implications of this on the CAZ retail cluster at Vauxhall. In response, Wandsworth have clarified what constitutes smaller-scale uses, which is considered to be consistent with the approach agreed in the VNEB OAPF.

¹¹ The Minister for housing wrote a letter to those authorities within the CAZ, dated 28 February 2022. It expressed concern that the case for an Article 4 Direction across the entire CAZ had not been justified. At the time of writing, some CAZ authorities have received a modification notice from the Secretary of State and others have not.

- Lavender Hill and Clapham South are shared town centres. Wandsworth and Lambeth took a different approach in respect of these centres when making an Article 4 Direction to remove Class MA permitted development rights, but this was carried out in consultation between boroughs. Lambeth has not specifically made an Article 4 Direction to remove the class MA permitted development right in any of its local centres, whereas Wandsworth's Article 4 Direction is proposed to apply to all defined centres and important local parades.
- In respect of the 2019 Statement of Common Ground, agreements LBL-9 and LBL-10 remain relevant.

Merton:

- **Merton** plan to designate Colliers Wood as a district centre, despite it not being recognised as such in the London Plan; it is **agreed** that this is not considered to impact on Wandsworth's centres.

- 5.27. Potential challenges of protecting town and local centres in the context of existing and future changes to Permitted Development Rights (PDR) is noted by **Wandsworth, Westminster, Hammersmith and Fulham** and **Kensington and Chelsea**. Following the introduction of PDR to allow changes of use from Class E to Class C3, authorities have introduced Article 4 Directions to limit this, with co-ordination having taken place between boroughs (particularly **Westminster, Lambeth, Richmond** and **Kensington and Chelsea**) and through regular meetings chaired by GLA.
- 5.28. Wandsworth, **Merton** and **Kingston** all recognise the potential for investment in existing centres (Clapham Junction / Tooting or Balham, Wimbledon, Kingston upon Thames) if Crossrail 2 is realised.

Neighbourhood Planning

- 5.29. Wandsworth **agrees** to keep neighbouring boroughs informed of any neighbourhood plans adjoining the borough boundary between any two (or more) parties¹².

Transport infrastructure

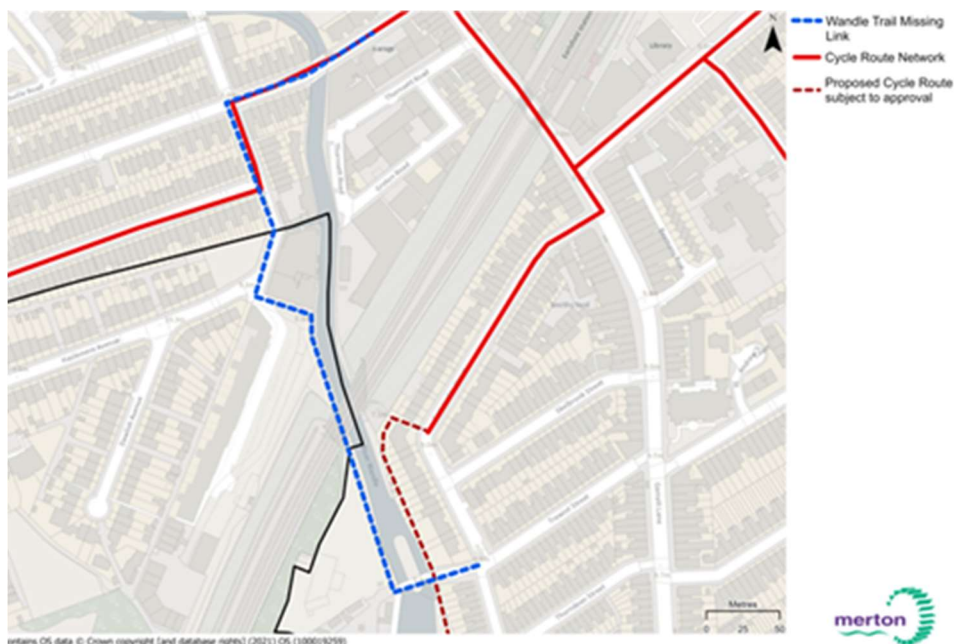
- 5.30. The Wandsworth Local Plan advocates support for the main ongoing infrastructure projects in the borough, such as Crossrail 2. Wandsworth is committed to working on these projects with Transport for London and neighbouring boroughs. Two new bridges have been proposed for the Thames, these being the Nine Elms to Pimlico bridge (Wandsworth to **Westminster**) and the Cremorne (Diamond Jubilee) Bridge (Wandsworth to **Hammersmith and Fulham**).
- 5.31. For Crossrail 2, the Plan recognises that the project may not come forward (having been suspended in November 2020), and therefore incorporates a 'fallback' option, that major development sites – particularly in Clapham Junction – would still be suitable for redevelopment even without this infrastructure, albeit on a likely reduced scale. Tooting is the preferred location for a station on the Crossrail 2 project. This would necessitate the comprehensive redevelopment of Tooting town centre (in particular the area around the current station). The Area Strategy for Tooting emphasises the protection of the area,

¹² See also LBL-1.

including the retention (or re-provision) of the markets. Being close to **Merton**, this is considered a cross-boundary issue and Merton supports it in principle.

- 5.32. The Local Plan area strategy for Nine Elms promotes the development of the Nine Elms Pimlico Bridge, with the Kirtling Street area of Nine Elms identified as the preferred landing site on the south bank. The bridge would connect the community in Pimlico with the new developments in Nine Elms and create new opportunities for active travel. **Westminster** has stated in its City Plan (adopted 2021) that, ‘as a matter of principle we do not favour proposals for new river crossings in Westminster’. Disagreement with respect to ambitions for the bridge is noted, though both boroughs **agree** to continue to liaise on the issue should the scheme progress.
- 5.33. This strategic matter has not been identified as a cross-boundary issue with **Hammersmith and Fulham, Kensington and Chelsea, Kingston or Richmond**. Wandsworth and **Hammersmith and Fulham / Kensington and Chelsea** are coordinating efforts on the respective riverside activities through LIP, CIL and TfL funding packages, which includes the Cremorne Bridge. Wandsworth and Richmond have discussed some specific proposals/plans close to the boundary between the authorities, including Crossrail 2 and potential to improve links between Roehampton and Barnes Station, but **agree** there are no strategic or cross-boundary issues that need to be addressed, given there is continuing engagement with TfL and neighbouring boroughs. The Richmond Local Plan (Regulation 18) notes, in the place-based strategy for Mortlake & East Sheen, a potential route through Sheen and Mortlake into the neighbouring borough of Wandsworth (as identified in TfL’s London Cycling Action Plan as 19. Clapham Common to Mortlake).
- 5.34. Transport is considered a cross-boundary issue with **Lambeth**, who support a co-ordinated approach to transport¹³. Wandsworth is amenable to such an approach, and this is being pursued amongst transport colleagues. Promotion of active travel is being reflected in both **Lambeth’s** adopted Local Plan and **Wandsworth’s** draft Local Plan.
- 5.35. Finally, **Merton** have highlighted an upcoming S106 project with cross boundary implications, noting it would be good to be identified within the Wandsworth Draft Local Plan and for both boroughs to liaise to ensure consistent mapping. This project relates to the Wandle Trail, known as the ‘missing link’, where it deviates from the riverside west of Earlsfield’s centre. Wandsworth and **Merton** officers are already in contact on this and **agree** in principle to a cross boundary approach.
- 5.36. Merton’s Policies Map proposes the following link within the Merton borough boundary and for the purposes of co-operation, have illustrated the route below crossing into Wandsworth’s borough boundary (with the black lines indicating the borough boundaries)

¹³ See LBL-20 to LBL-32, and Appendix 2.



Telecommunications and digital infrastructure

- 5.37. Though a strategic matter, this has not been identified as a cross-boundary issue with any one specific borough¹⁴.
- 5.38. National Grid is building the London Power Tunnels 2 project, 33km of underground cabling from Wimbledon to Bexley via Wandsworth, **Lambeth**, Southwark, Lewisham and Greenwich. The project is under construction and National Grid have already compulsorily purchased the necessary land. The first circuit from Wimbledon substation in Merton to New Cross in Lewisham is due to be complete in 2025. Although it connects to the large National Grid substation in Merton, the tunnelling work and shafts for the boring machine to exit will be located in Wandsworth within the Garrett Mills business park. Although this is a cross boundary issue, as the project is underway (and underground) it is not considered to raise issues for either Local Plan.

Waste management

- 5.39. Wandsworth has published a Waste Technical Study, (Wandsworth Local Plan Review: Waste Evidence Base, completed in 2020), which is available online. The overall summary position of the report 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. **Hammersmith and Fulham, Merton, Richmond, Westminster City Council** and the **Royal Boroughs of Kensington and Chelsea and Kingston Upon Thames agree** with Wandsworth's approach to plan separately to meet its Local Plan waste apportionments.
- 5.40. A Duty to Cooperate Report on Waste Exports was published in May 2021. The Report provides an audit and analysis of the issues raised during the duty to cooperate engagement on waste exports January – March 2021, which formed part of Wandsworth's draft Local

¹⁴ It was covered by LBL-18 in the 2019 agreement with Lambeth.

Plan Regulation 18 consultation. 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 and if a statement of common ground is required.

- 5.41. LB Wandsworth exports strategic levels of waste to Merton, and both parties **agree** there are no known planning reasons why exports of similar amounts of waste exports cannot continue. There are no strategic waste exports to **Westminster, Hammersmith & Fulham, Kensington & Chelsea, Kingston, Lambeth** or **Richmond**. Wandsworth and **Westminster** agree that waste management is not a cross-boundary issue. Wandsworth and **Kingston** agree that waste management is not a cross-boundary issue.
- 5.42. LB Wandsworth is home to the Western Riverside Waste Authority (WRWA) facilities which manage or transfer Local Authority Collected Waste (LACW) from the other Western Riverside Authorities of **Hammersmith & Fulham, Kensington & Chelsea** and **Lambeth**. This means that Wandsworth receives strategic amounts of LACW imports from **Hammersmith & Fulham, Kensington & Chelsea** and **Lambeth**. In addition to LACW, **Hammersmith & Fulham, Kensington & Chelsea, Kingston, Lambeth** and **Merton** also export some CD&E waste to Wandsworth. All parties **agree** there are no known planning reasons why imports to Wandsworth of similar amounts of waste cannot continue (LBL-35 and LBL-36).
- 5.43. As an outcome of this ongoing process, Wandsworth will work towards preparing Statements of Common Ground with each of the non-neighbouring WPAs who consider waste exported from Wandsworth to their area to be a strategic issue. This will be completed independently from this SCG, and includes:
- London Borough of Havering
 - Hertfordshire County Council
 - Kent County Council
 - Medway Council
 - Old Oak and Park Royal Development Corporation
 - Surrey County Council
 - Thurrock Council

Water supply and wastewater management

- 5.44. Thames Water is the statutory water and sewerage undertaker for the area and is hence a “specific consultation body” in accordance with the Town & Country Planning (Local Development) Regulations 2012. From the 1st April 2018 all network reinforcement work required to support development will be delivered by Thames Water and funded through the Infrastructure Charge applied to each property connected to the water and wastewater networks. The Infrastructure Charge will also cover all modelling and design work required to deliver any necessary upgrades. The planning system will still play a key role in assisting that development does not outpace the delivery of any necessary infrastructure provision. It will be essential that all development is aligned with any necessary water and sewerage infrastructure upgrades required to avoid any adverse impacts such as sewer flooding, pollution of land or watercourses and impacts of low/no water pressure. In line with policies in the boroughs’ local plans, Thames Water will, where appropriate, request

phasing conditions are used to ensure that any new development or phase of development is not occupied until any necessary upgrades have been completed.

- 5.45. Thames Water are helping to deliver the Thames Tideway Tunnel project which will be a new fifteen-mile-long ‘super sewer’ running under the River Thames. Wandsworth continues to support the implementation of the Thames Tideway Tunnel, alongside neighbouring authorities. This strategic matter has not been identified as a cross-boundary issue with **Hammersmith and Fulham, Kensington and Chelsea, Kingston, Merton, Richmond, Lambeth¹⁵ or Westminster**. The Thames Tideway project is due for completion in 2024/2025.

Flood risk

- 5.46. Flood risk in each borough is addressed through respective Strategic Flood Risk Assessment (SFRAs) and Local Plans planning policies. SFRAs assess the risk from all sources of flooding, this includes fluvial, tidal, surface water and foul water sources. Each council is statutorily required to produce a Local Flood Risk Management Strategy (LFRMS) for their respective borough which details how they assess and will manage Local Flood Risk within their administrative boundary. LFRMSs require cross boundary partnership working to achieve the ultimate outcome of reducing Local Flood Risk.
- 5.47. As part of the partnership working, Wandsworth’s Flood Risk Officers meet those of other boroughs at quarterly Flood Group meetings, which form part of the reporting mechanism for the Thames Regional Flood and Coastal Committee. These meetings assist in collaborative working and also provide a platform for sharing knowledge and common issues in flood risk management.
- 5.48. Wandsworth and **Lambeth¹⁶** are hydraulically connected through shared watersheds which impact on each borough’s risk of flooding from surface water. The risk of flooding from surface water is assessed in respective Surface Water Management Plans, where areas at significant risk of flooding are identified and are labelled as Critical Drainage Areas (CDAs).
- 5.49. **Merton and Wandsworth** have a shared strategic flood risk assessment. Both boroughs are committed to continuing this joint work. This strategic matter has not been identified as a cross-boundary issue with **Hammersmith and Fulham, Kensington and Chelsea, Kingston, Richmond or Westminster**. It is noted there continues to be joint working arrangements to address flood risk, such as through the [Thames Regional Flood and Coastal Committee](#) and the [London Drainage Engineers Group \(LoDEG\)](#).

Climate change mitigation

- 5.50. **Wandsworth**, like many, declared a Climate Change Emergency in 2019, and in response has developed the Wandsworth Energy and Sustainability Strategy (WESS). This is a cross-cutting strategy on addressing climate change – which focuses both on internal and external actions, including carbon neutrality as an organisation by 2030 and zero carbon by 2050. As a result, there is increased political emphasis on the issue.

¹⁵ See LBL-37.

¹⁶ See LBL-38 and LBL-39

- 5.51. In line with this, the Local Plan takes forward the London Plan’s zero carbon approach (Policy SI2) with respect to major sites and will introduce more rigorous requirements for developments on smaller sites (all new residential at least 35% reduction above Target Emission Rate on-site).
- 5.52. Overall, this strategic matter has not been identified as a cross-boundary issue with **Hammersmith and Fulham, Kensington and Chelsea, Kingston, Richmond, Lambeth or Westminster**. It is noted that **Kingston, Hammersmith and Fulham, Lambeth**¹⁷ and **Merton** have similar climate targets. **Westminster** has a target of being a climate neutral council by 2030 and city by 2040.
- 5.53. **Merton** are introducing carbon offset targets for minor developments whereas Wandsworth have followed the amount identified in the London Plan. Although it is not identified as a strategic issue, the need to address the climate emergency is a shared priority; it is noted that the proposed policy approach in the **Richmond** Local Plan (Regulation 18) sets out how all developments resulting in 1 or more dwellings have to achieve net-zero, with specific onsite carbon emission reduction requirements, and a proposed higher carbon offset rate.

Energy infrastructure

- 5.54. The Draft Local Plan continues to promote decentralised energy networks. There are two networks within Nine Elms: the Embassy Quarter Heating Network (EQHN) and the Battersea Power Station Heating Network. These have a relationship with both **Lambeth** and **Westminster**. **Lambeth** follows the London Plan policy approach to the provision of energy in relation to new development (see Lambeth Local Plan policy EN3)¹⁸.
- 5.55. This strategic matter has not been identified as a cross-boundary issue with **Hammersmith and Fulham, Kensington and Chelsea, Kingston, Merton, Richmond, or Westminster**.

Provision of minerals

- 5.56. This strategic matter has not been identified as a cross-boundary issue with **Hammersmith and Fulham, Kensington and Chelsea, Kingston, Merton, Richmond, Lambeth or Westminster**.

Health care

- 5.57. The NHS South West London Clinical Commissioning Group¹⁹ is responsible for planning, commissioning and buying health services for people living and working in south west London. The CCG serves around 1.5 million people living within the six boroughs of Wandsworth, **Kingston, Merton, Richmond**, Sutton and Croydon. The CCG is responsible for primary care (the services received at a GP practice), hospital treatment, rehabilitation services, urgent and emergency care, community health services, mental health and learning disability services. Strategic cooperation already takes place.

¹⁷ LBL-47 commits Lambeth and Wandsworth to cooperation in respect of their climate change mitigation strategies; Lambeth’s Climate Action Plan will be finalised in 2022.

¹⁸ See LBL-40, LBL-41 and LBL-42.

¹⁹ NHS South West London Clinical Commissioning Group was abolished on 1 July 2022 and its functions were transferred to a new organisation, NHS South West London Integrated Care Board.

- 5.58. Health infrastructure planning across this area, and into neighbouring **Lambeth** (which is part of the South East London CCG) reflects the priorities of the respective CCG, and this has regard to, and acknowledges, potential movement of patients across the respective borders. **Kingston, Merton and Richmond agree** that there are no planning reasons as to why these movements cannot continue, allowing collaborative work across boundaries to continue. This strategic matter has not been identified as a cross-boundary issue with **Hammersmith and Fulham, Kensington and Chelsea, Kingston, Merton, Richmond, Lambeth²⁰** or **Westminster**, though it is acknowledged that the impacts of major development around the borders of boroughs ought to be considered so that overall health and well-being impacts on current and future residents can be considered.
- 5.59. Wandsworth is updating the Infrastructure Delivery Plan (IDP), alongside the Regulation 19 version of the Local Plan. The borough can meet its projected health needs. A new Health Centre at Sleaford Street, secured as part of Battersea Power Station Phase 4a and funding agreement with NHS Property Services, will provide new primary health care facilities to support the predicted new population of c.34,700 and the existing residents, thereby contributing to the health and well-being of local communities. In addition, the Council will work in partnership with the NHS to deliver additional health care at Nine Elms Square (see Local Plan policy PM3).

Schools and education

- 5.60. The greatest pressure on educational provision in Wandsworth is in Queenstown ward in the north east of the borough, close to the boundary with **Lambeth**. **Lambeth** and Wandsworth both have school place planning teams who seek to ensure that projected levels of demand for both primary school and secondary school places are met. Each party has undertaken a school place planning exercise which has had regard to cross-border movement of pupils between the two boroughs. In Queenstown, the Wandsworth Local Plan commits to bringing forward a new two-form entry school primary school at the identified site of Plot C1, Nine Elms Parkside in time to meet the need arising from development and ensure the provision is made for potential expansion in future years. This new school in Nine Elms is being developed in partnership with **Lambeth²¹** and is not identified as a cross-boundary issue. Beyond this additional provision, Wandsworth considers itself able to meet its school needs without further school development.
- 5.61. **Merton** has planned for increased school places and in addition to the expansion of primary schools that took place from 2007 to 2015, a new secondary school was opened in 2018 (Harris Wimbledon) and in 2020 moved to its new site in South Wimbledon. As identified in Merton's Infrastructure Delivery Plan, there is an increasing need for school places for children with additional needs; Merton Council has expanded the existing special needs school at Cricket Green and proposes additional places at Whatley Avenue towards the west of the borough. There is school places movement across borough boundaries but this issue is not identified as a strategic or cross-boundary issue beyond what is referred to above.
- 5.62. This strategic matter has not been identified as a cross-boundary issue with **Hammersmith and Fulham, Kensington and Chelsea, Kingston, Richmond** or **Westminster**.

²⁰ See LBL-13, LBL-14, LBL-15 and LBL-16.

²¹ See LBL-8 and LBL-17.

Community and cultural infrastructure

- 5.63. Wandsworth has adopted a borough-wide Arts and Culture Strategy and its aims and objectives have been incorporated into the Local Plan. This is written to complement other arts and cultural initiatives around Wandsworth's neighbourhoods, including in the Vauxhall, Nine Elms and Battersea area (where there is an existing area Cultural Strategy) and the GLA / Port of London Authority River Thames Cultural Vision.
- 5.64. This strategic matter has not been identified as a cross-boundary issue with **Hammersmith and Fulham, Kensington and Chelsea, Richmond, Kingston, Lambeth, Merton or Westminster**.

Natural environment and green infrastructure

- 5.65. Wandsworth has undertaken an update of the borough's Open Space Strategy. The study provides the basis for the protective approach taken in the Wandsworth Local Plan.
- 5.66. The Local Plan also incorporates an Urban Greening Factor (UGF), which relies on the values established in the adopted London Plan, rather than a local formula (see Policy G5 of the London Plan and LP57 of the Wandsworth Local Plan). Policy LP57 commits to keeping this under review.
- 5.67. Between **Merton** and Wandsworth, the proposed expansion of the All England Lawn Tennis Club into the adjacent Wimbledon Park (mostly located in Merton and a site allocation Wi3 in Merton's Local Plan, partly located in Wandsworth) presents shared issues for the two boroughs in respect of the holding of the annual Championships, heritage, travel and open space issues. This is being dealt with through the planning application process and a cross-boundary planning application has been submitted to both boroughs in their roles as Local Planning Authorities as the development straddles the borough boundary (reference 21/P2900 in Merton; reference 2021/3609 in Wandsworth).
- 5.68. A specific issue has been raised in respect of the **Richmond** Local Plan. In the [Habitats Regulation Assessment \(HRA\)](#), undertaken by LUC for LB Richmond, a potential negative effect on the protected Wimbledon Common Special Area of Conservation (SAC) cannot be ruled out (according with recent judgements, that in-combination air pollution effects are expected to be assessed). Despite the mitigation provided within the draft Plan, including Richmond Council's Air Quality Action Plan, a precautionary approach is required involving further traffic modelling. Transport colleagues have already requested from TfL strategic traffic modelling (affecting A219, A3 and A306 in the vicinity of 200m of Wimbledon Common SAC) to assist with this, so as to explore further whether proposed development (as a result of the Richmond Local Plan alone and/or in-combination, particularly within Wandsworth and **Merton**) will exceed a threshold of 1000 AADT for non-HGV's and 200 AADT for HGV. The outcome will be subject to ongoing liaison.
- 5.69. The River Thames provides a major asset that the adjoining authorities of **Richmond**, Wandsworth and **Lambeth** border. All three authorities recognise the importance of this setting and have **agreed** complementary policy approaches to shape future development

within the two areas designated through the London Plan as Thames Policy Areas²². The River Thames and the Tidal Tributaries are defined as a SINC, and joint working and collaboration extends to ensuring that this designation is observed when determining applications that could have an impact upon this²³. **Richmond** has agreed that there continue to be similar approaches taken to assessing open spaces, sport and recreational facilities and there will be ongoing opportunities to consider the evidence base.

- 5.70. Wandsworth riverbanks are viewed across the River Thames from **Westminster, Hammersmith and Fulham** and **Kensington and Chelsea** banks. Wandsworth's approach to the open space and biodiversity attached to the River Thames has not changed and Wandsworth will continue to work to protect and enhance its natural environment. There are shared areas of heritage along the river that are detailed in section 4, above.
- 5.71. Wimbledon and Putney Common border **Kingston**, and it is recognised that there is scope for cross-borough alignment. In Wandsworth, the approach to the protection and enhancement for these types of open space has not changed and the findings from the Open Space Study and the Playing Pitch Strategy can be shared upon request. Both boroughs **agree** to continue supporting green links and green chains that cross over the boundary.
- 5.72. With **Lambeth**, joint working on the continuity of the Thames Path is supported by both authorities. Both parties **agree** to work collaboratively to improve the Thames Path in close proximity to the borough boundary between them. No further strategic or cross-boundary issues have been identified or anticipated, and both parties agree to rely on the bi-lateral Statement of Common Ground 2019 produced by **Lambeth**²⁴.

Historic environment

- 5.73. The Wandsworth Local Plan Policy LP3 (The Historic Environment) seeks to conserve and enhance the significance, character and appearance of the borough's historic environment.
- 5.74. The UNESCO **Westminster** World Heritage Site is identified as being of cross-borough importance. As a stakeholder borough, Wandsworth will continue to protect the UNESCO **Westminster** World Heritage Site, and this is stated within the Local Plan. New development will be assessed and scrutinised in terms of any impact through the London View Management Framework (LVMF). **Westminster** has confirmed support for this.
- 5.75. Whilst there are a number of shared assets of heritage and conservation importance, and important strategic and local views identified, between Wandsworth and its neighbouring boroughs (see section 4, and section 5 reference to the All England Lawn Tennis Club planning application at Wimbledon Park), this strategic matter has not been identified as a cross-boundary issue with **Hammersmith and Fulham, Kensington and Chelsea, Richmond, Kingston, Merton** or **Lambeth**²⁵.

²² See LBL-48 and LBL-49 in respect of the existing agreement between Lambeth and Wandsworth for the relevant Thames Policy Area

²³ See LBL-45, LBL-46, LBL-52 and LBL-53.

²⁴ See LBL-43, LBL-44, LBL-45 and LBL-46. LBL-52 and LBL-53 are also relevant.

²⁵ See LBL-54, LBL-55 and LBL-56.

Tall buildings and built environment

- 5.76. The Council has undertaken an Urban Design Study (UDS), to develop a better understanding of the values, character and sensitivity of different parts of the borough and to enable a design-led approach to housing capacity on allocated sites. As part of the work, an assessment of the scope for, and impact of, tall buildings has been undertaken which will both ensure compliance with London Plan policy and contribute to the understanding of the capacity of such buildings to meet development needs. Tall buildings clearly have an impact on the built environment both locally and more strategically, dependent on where they are located. The tall building policy identifies a local definition for tall and mid-rise buildings (informed by the local prevailing height) and identifies broad locations across the borough where tall buildings may be appropriate.
- 5.77. The work on the approach to tall buildings has been concluded between the consultation on the Regulation 18 plan, and the publication of the Regulation 19 plan, and has been completed to inform the latter. The assessment of character and sensitivity, alongside an assessment of the likelihood for change and the availability of opportunity gives rise to a composite map which sets out those areas where tall buildings could be acceptable, and more detailed work within each of these areas begins to map out heights that might be appropriate.
- 5.78. The strategy for tall buildings focuses on the Nine Elms Opportunity Area, the five town centres (Balham, Clapham Junction, Putney, Tooting and Wandsworth), the River Thames frontage through Wandsworth and Battersea and known areas with emerging masterplans or major planning applications. The principal issues for neighbouring boroughs will occur along the River Thames (particularly in respect of key views and riverside impact) and at VNEB. In this respect, **Hammersmith and Fulham, Kensington and Chelsea, Westminster and Lambeth** are likely to have the greater interest in policy direction; for **Merton, Richmond and Kingston**, the possible impact is less immediate.
- 5.79. Given its strategic importance to the city's image and reputation as a whole, the means of dealing with tall buildings has developed with the guidance of successive Mayors and policy guidance exists at D9 of the adopted London Plan. Authorities are now required to define 'tall buildings' for their particular context and include, within their development plan, maps to define appropriate locations for tall buildings. In addition, the VNEB Opportunity Area has a tall buildings strategy within the adopted Planning Framework (GLA, 2012).
- 5.80. **Hammersmith and Fulham** and **Kensington and Chelsea** both agree with the policy framework set out in the London Plan and in the emerging Wandsworth Plan (Policy LP4) and welcome the thorough assessment of the impact of tall buildings in Wandsworth against these policy parameters. **Kensington and Chelsea** have commented that the townscape across the River in Wandsworth is one that is very different in context from that on Chelsea embankment. There are already a large number of modern tall buildings along this southern stretch of the River in Wandsworth and this is evolving with the development at Nine Elms.
- 5.81. Likewise, several locations within Wandsworth along the boundaries with **Merton** and **Richmond** have been identified as zones appropriate for tall and mid-rise buildings. Although, tall buildings in these locations are likely to impact on views from these boroughs, 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. Lambeth and Merton have highlighted that

they would consider the tall buildings policies as part of the Local Plan consultation, in which neither borough made further comments at Regulation 18. **Richmond** have commented that the policy approach will enable the assessment of site specific proposals, and there can be ongoing engagement as part of consultations through the DM process if there are impacts that need to be raised.

- 5.82. Within **Lambeth**, locations appropriate for tall buildings have been identified in close proximity to the borough boundary (see Annex 10 of the Lambeth Local Plan 2021, which supports Policy Q26). There is no presumption in favour of tall buildings outside of these defined areas. There are no sites in Lambeth’s emerging draft Site Allocations DPD 2022 that identify additional locations for tall buildings in close proximity to the borough boundary with Wandsworth. Protected views are covered by Q25.
- 5.83. **Kingston** and **Westminster** have short boundaries with Wandsworth, and this strategic matter has not been identified as a cross-boundary issue. **Westminster** and Wandsworth agree to consult/work together to minimise or mitigate the impacts of tall buildings on views from/to Westminster, particularly those affecting Westminster’s World Heritage Site.

6. Governance arrangements

- 6.1. Requirements for signing documents differ between Local Authorities depending on their structure. It will be for each body to decide who is the appropriate person to sign the statement.

| Organisation | Officer Lead | Senior or political approval of the SCG | Sign off |
|---|---|--|--|
| <i>London Borough of Hammersmith and Fulham</i> | David Gawthorpe, Team Leader, Policy and Spatial Planning | Informal Member briefing | Delegated approval for the Chief Planner to sign |
| <i>Royal Borough of Kensington and Chelsea</i> | Preeti Gulati Tyagi, Planning Policy Team Leader | | tbc – Head of Spatial Planning/Director of Planning |
| <i>Royal Borough of Kingston upon Thames</i> | Thomas Sild, Senior Planning Policy Officer | Assistant Director for Strategic Planning and Infrastructure | Portfolio Holder for Planning Policy |
| <i>London Borough of Lambeth</i> | Catherine Carpenter, Head of Policy and Place-shaping | Director of Planning Transport and Sustainability | Director of Planning Transport and Sustainability |
| <i>London Borough of Merton</i> | Tara Butler, Deputy Head of Future Merton | | |
| <i>London Borough of Richmond upon Thames</i> | Joanne Capper, Principal Planner (Policy) | Assistant Director of Environment and Community Services in liaison with the Chair of the ESCS Committee | Assistant Director of Environment and Community Services |

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| <i>Westminster City Council</i> | Lukas van der Steen, Principal Planning Officer (Planning) | Cabinet Member for Planning and Economic Development | Cabinet Member for Planning and Economic Development |
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7. Timetable for agreement, review, and update

- 7.1. This statement has been informed by on-going engagement between the parties and has been informed by various evidence base documents. In addition to Duty to Cooperate meetings, the Council also regularly partakes in the Association of London Borough Planning Officer (ALBPO) meetings.
- 7.2. This SCG is a live document and will be reviewed on a regular basis, informed by continued communication between the parties through meetings, statutory consultation at key plan making stages and electronic communication.
- 7.3. As this statement focuses on issues of relevance to Wandsworth's Draft Local Plan, post examination will only need further updating once work commences on any future revisions to the Local Plan. Ongoing collaboration between partners will continue through regular meetings on a one to one basis and through attendance at group meetings where cross boundary issues are discussed.

Appendix One: Agreements made between LB Lambeth and LB Wandsworth in the signed bi-lateral Statement of Common Ground 2019

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| Neighbourhood Planning | |
| 1 | Wandsworth agrees to keep Lambeth informed of any neighbourhood plans adjoining the borough boundary between the two parties, particularly those covering Tooting Bec where there are two Lambeth cemeteries |
| Affordable housing | |
| 2 | In terms of affordable housing, to ensure a consistent approach across London, both parties support the Mayor's threshold approach to affordable housing and the Mayor's strategic target of 50% affordable housing across London. |
| Gypsies and Travellers | |
| 3 | Both boroughs acknowledge the London Plan Inspector's report which recommended a strategic evidence base: 'the mayor should commit to leading a London-wide accommodation needs assessment for gypsies and travellers as soon as possible' to inform new London Plan policy. |
| 4 | Wandsworth agrees that Lambeth can meet its identified need for gypsy and traveller pitches over the DRLLP PSV plan period within the confines of its own administrative boundary. |
| Employment, retail, leisure and other commercial development | |
| 5 | Both parties agree to work collaboratively to deliver the Draft London Plan approach to the CAZ and consult each other on major applications with potential strategic cross border impacts |
| Visitor accommodation | |
| 6 | Both parties agree to work collaboratively to manage the growth of visitor accommodation around Vauxhall to ensure the most effective mix of land uses in that part of the CAZ. |
| Vauxhall Nine Elms Battersea Opportunity Area | |
| 7 | Both parties agree to work collaboratively through the VNEB Strategy Board to deliver the housing and employment targets and any other strategic matters affecting VNEB. |
| 8 | Both parties agree to work collaboratively to deliver the infrastructure identified via the Nine Elms DIRR study, where it is identified as having cross-borough implications. |
| Shared town centres | |

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| 9 | Both parties agree to work collaboratively to ensure that their respective policy approaches to shared town centres in their respective local plans are aligned. |
| 10 | Both parties agree to work collaboratively and share monitoring information and analysis of the health of town centres – particularly where analysis suggests emerging issues that may require joint action. |
| Strategic Areas for Regeneration | |
| 11 | Both parties agree to work collaboratively to ensure that their respective policy approaches to Strategic Areas for Regeneration in their respective local plans are aligned. |
| 12 | Both parties agree that joint work on employment benefits from the VNEB area via planning obligations (S106 agreements) have secured shared areas of benefit. |
| Health | |
| 13 | Both parties acknowledge that there is likely to be cross border movements of patients between each borough but agree there are no known planning reasons why these movements cannot continue. |
| 14 | Both parties agree to work collaboratively to meet the needs for strategic cross border health facilities including that in the Vauxhall Nine Elms Battersea OA |
| 15 | Both parties agree to ensure that their infrastructure delivery plan acknowledge cross-boundary issues and take into account wider healthcare needs and service catchments. |
| 16 | Both parties agree to work collaboratively in terms of sharing of information about health impacts |
| Education | |
| 17 | Both parties acknowledge that there is likely to be cross border movements of school pupils between each borough but agree there are no known planning reasons why these movements cannot continue. |
| Telecommunications | |
| 18 | Both parties agree to work collaboratively on the delivery of digital connectivity infrastructure where there are cross-border implications |
| Security | |
| 19 | Both parties agree to work collaboratively to ensure that counter terrorism measures such as hostile vehicle mitigation are in place as required. |

| Transport | |
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| 20 | Both parties agree to work collaboratively to deliver the Mayor's Transport Strategy outcomes with regards to walking and cycling |
| 21 | Both parties agree to consult each other about proposed changes to parking controls (for example, proposed new CPZs) where these may have a cross-border impact |
| 22 | Both parties agree to ensure a co-ordinated approach to bus network and service improvements. |
| 23 | Both parties agree to promote and support the development and implementation of improvements to local rail services |
| 24 | Both parties agree to work collaboratively to support strategically important transport infrastructure |
| 25 | Both parties agree to consult each other about proposals for Clapham Common and the wider area including any transport impacts |
| 26 | Wandsworth agrees that, in order to mitigate impact of traffic associated with the redevelopment Pensbury Place waste transfer station, it will ensure cross-border consultation on all proposals to intensify the waste uses particularly in regard to transport impacts. |
| 27 | Both parties agree to work collaboratively to improve cycle links through Tooting Bec Common |
| 28 | Both parties agree they recognise and support the strategic need for a pedestrian and cycle crossing of the River Thames between Pimlico and Vauxhall Nine Elms |
| 29 | Both parties agree to take a co-ordinated approach to construction, logistics and road safety in the VNEB OA. |
| 30 | Both parties agree to work collaboratively to deliver the Nine Elms Cycle Strategy through the VNEB board. |
| 31 | There is a point of disagreement concerning TfL's plan to replace the Vauxhall Gyratory. Wandsworth Council's position is qualified as: 'The proposals for the Vauxhall Gyratory support the ambitions of the Nine Elms Vauxhall Partnership for the transformation of the VNEB Opportunity Area into a new central London district. However, it is also important that the scheme does not have an adverse impact on traffic movement in Wandsworth borough.' Lambeth Council's position is that the Gyratory proposal has already been subject to extensive public consultation and traffic modelling by TfL, who are satisfied that traffic impacts are within acceptable levels, and it is therefore understood that TfL will implement the gyratory in the form proposed. Due to these factors and the benefits arising from the proposal, Lambeth are supportive of the scheme as currently proposed. |

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| 32 | Both parties agree to work collaboratively to deliver the removal of the Vauxhall Gyrotory and mitigate local impacts should they arise. |
| Air Quality | |
| 33 | Lambeth and Wandsworth agree to cooperate in the implementation of each borough's respective strategies and action plans. |
| 34 | Both parties agree to continue their involvement in a number of cross-organisational projects and organisations to tackle poor air quality across London |
| Waste Management | |
| 35 | Both parties agree there are no known planning reasons why exports of similar amounts of waste exports cannot continue. |
| 36 | Both parties agree to plan separately to meet their respective Local Plan waste apportionments |
| Water supply, wastewater | |
| 37 | Each party agrees to support this approach to planning for water and waste water infrastructure. |
| Flood risk | |
| 38 | Both parties agree to have regard to each other's flood risk policies and evidence |
| 39 | Both parties agree to work collaboratively to reduce the risk of flooding within Critical Drainage Areas. |
| Provision of energy (including heat) | |
| 40 | Both parties agree to work collaboratively where opportunities arise to connect development to heat networks that cross, or are in close proximity to, the borough boundary between the two parties. |
| 41 | Both parties agree to work collaboratively and through the VNEB Board to ensure the continuing development and delivery of a coherent, low carbon energy supply system for the area. |
| 42 | Both parties agree to take a co-ordinated approach to utilities co-ordination (in particular District Heat Networks) |
| Green Infrastructure (including SINC's and MOL) | |
| 43 | Each party acknowledges that Clapham Common (MOL) and Woodfield Recreation Ground and School Playing Field (MOL) are shared resources in terms of meeting green infrastructure needs, given their proximity to each borough's residents. |

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| 44 | Both parties agree to consult and to cooperate in respect of the management decisions on these spaces. |
| 45 | Both parties agree to consult each other on any proposals that could impact on open spaces, outdoor recreation and other green infrastructure, including SINC and/or MOL, within the neighbouring borough. |
| 46 | Both parties agree to have regard to each other's SINC and MOL designations, on or in close proximity to the borough boundary, and their respective Local Plan policies when determining applications. |
| Planning measures to address climate change mitigation and adaption | |
| 47 | Lambeth and Wandsworth agree to cooperate in the implementation of each borough's respective strategies and action plans. |
| River Thames | |
| 48 | Both parties agree to consult each other on any proposals that have an impact on the neighbouring borough either through views or infrastructure, on/in the River Thames and have regard to each other's respective Local Plan policies. |
| 49 | Both parties agree to work collaboratively to implement policies affecting the London Plan Thames Policy Area |
| River services | |
| 50 | Both parties agree to work collaboratively to improve both passenger transport on the River and use of the River for freight movements. |
| 51 | Both parties support river transport and agree there are no known planning reasons why these river services cannot continue. |
| River Thames Sites of Importance for Nature Conservation | |
| 52 | Both parties agree to consult each other on any proposals that could impact on the River Thames and Tidal Tributaries Metropolitan SINC. |
| 53 | Both parties agree to have regard to the River Thames and Tidal Tributaries Metropolitan SINC designation and each other's respective Local Plan policies when determining applications that could impact on this designation. |
| Strategic and local views, and heritage, design and conservation | |
| 54 | Both parties agree to have regard to cross border strategic and local views when determining applications, and consult each other on any proposals that could impact on these views. |

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| <p>55</p> | <p>Both parties agree to have regard to the setting of heritage, design and conservation designations adjoining the borough boundary in the neighbouring borough when determining applications, and consult each other on any proposals that could impact on these designations.</p> |
| <p>56</p> | <p>Both parties agree to work collaboratively on the Westminster World Heritage Site Management Plan with the stakeholders, and to uphold the VNEB Tall Buildings Strategy.</p> |

Appendix 2: Schedule of representations received from Lambeth in the Regulation 18 Wandsworth Local Plan

In March 2021, LB Lambeth provided comments on the Regulation 18 Wandsworth Local Plan. The table below outlines the points made by Lambeth, and the council's response prior to the publication of the Regulation 19 Plan in January 2022.

| Consultation Point | Response | Council Response | Outcome |
|----------------------------|---|--|---|
| LP35 Visitor Accommodation | <p>Proposals involving the development, redevelopment and/or intensification of visitor accommodation will be supported where they are appropriately located within the Central Activity Zone (CAZ), within or on the edge of town centres, in Focal Points of Activity, or other locations with good levels of public transport accessibility (PTAL 4 or higher). London Plan policy E10 clearly outlines where strategically-important serviced accommodation should be promoted and where smaller-scale provision is appropriate. DRLLP policy ED14 aligns with this approach. Lambeth is concerned that policy LP35 may result in visitor accommodation being permitted outside of the CAZ and outside of town centres (which would be contrary to London Plan policy E10 G). Such developments in these locations could impact on neighbouring residential amenity. In accordance with London Plan policy E10, LP35 should make clear that within the CAZ, strategically-important serviced accommodation should be promoted in Opportunity Areas, with smaller-scale provision in other parts of the CAZ except wholly residential streets or predominantly residential neighbourhoods and subject to the impact on office space and other strategic functions. Outside the CAZ, serviced accommodation should be promoted in town centres and within Opportunity Areas (in accordance with the sequential test as set out in Policy SD7 Town centres: development principles and Development Plan Documents) where they are well-connected by public transport, particularly to central London. Lambeth would also like to know how Wandsworth has had regard to DRLLP policy ED14 section b). Lambeth would like to ensure that there is a consistent policy approach to additional visitor accommodation across the whole of Vauxhall.</p> | <p>Agreed. The policy has been revised to align with the London Plan and the Lambeth's approach to visitor accommodation in CAZ.</p> | <p>Amend policy LP35 to align with the London Plan.</p> |

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| LP46 Out of Centre Development | <p>There are limited circumstances in which the provision of certain new town centres uses in out-of-centre locations are identified within the Local Plan in order to contribute to wider strategic initiatives. In these instances, the Sequential Test set out in Part A.1. will not apply: 1.New town centre uses will be acceptable on sites identified for those uses within Site Allocations, and as set out in the Vauxhall Nine Elms Battersea Opportunity Area (VNEB OA) Framework, where the scheme is compliant with the requirements included within those documents. 2.In Economic Use Protection and Intensification Areas (EUPAs and EUAs) the provision of intensified office floorspace, as part of the mixed use redevelopment of the site, will be permitted where this complies with Policy LP 38 (Mixed Use Redevelopment). All other main town uses will be subject to a sequential test as set out in Part A. 3.In the Focal Points of Activity and edge of centre locations, proposals for new visitor accommodation uses will be acceptable, and will not be subject to the sequential test, where they comply with the requirements of Policy LP 35 (Visitor Accommodation). Further information on Focal Points of Activity is included in the Area Strategy for Wandsworth’s Riverside and in Policy LP 56 (Riverside Uses).</p> | <p>See response to comment on PM3 (Nine Elms Area Strategy). The inclusion of these uses within site allocations is considered to be in conformity with the VNEB OAPF, and that changes in response to comment on PM3 will have suitability mitigated concerns.</p> | <p>See response to comment on PM3 (Nine Elms Area Strategy) below</p> |
| | <p>With regards to exception 1, retail development is being supported in a number of site allocations in Nine Elms which lie in reasonably close proximity to Vauxhall (NE1, NE2, NE3, NE5, NE9, NE11, NE12). With this in mind, please see Lambeth’s comments relating to part PM3 D and E. Regarding exception 3, please see our comments relating to LP35.</p> | | |
| 20.05 | <p>Emphasis on reducing the need to travel and potential for home / local working / living is particularly relevant post pandemic.</p> | <p>Comments noted.</p> | <p>No changes to the Local Plan are considered necessary.</p> |
| 20.10 | <p>Trip making was already reducing pre-pandemic and future demand for transport services is uncertain / may not follow previous projections.</p> | <p>Comment noted.</p> | <p>No changes to the Local Plan are considered necessary.</p> |
| 20.33 | <p>There is ambiguity as to when permit free development will be required “ a clearer statement is suggested.</p> | <p>The existing language is considered sufficient.</p> | <p>No changes to the Local Plan are considered necessary.</p> |
| 20.33 | <p>There is ambiguity as to when permit free development will be required “ a clearer statement is suggested.</p> | <p>The existing language is considered sufficient.</p> | <p>No changes to the Local Plan are considered necessary.</p> |

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| <p>LP51 Sustainable Transport</p> | <p>Lambeth would support greater emphasis on the need to improve physical accessibility of the transport networks, including streets, and inclusiveness generally.</p> | <p>The Wandsworth Local Implementation Plan 3 (2019) provides details as to how the borough will create greater accessibility and inclusivity within the transport network.</p> | <p>No changes to the Local Plan are considered necessary.</p> |
| <p>LP53 Parking, Servicing, and Car Free Development</p> | <p>Car Free and Low Car development should be defined to avoid confusion, particularly in relation to the London Plan parking standards from which they can appear to depart. More explicit policy on reducing and managing servicing trips would be welcome, including reference to consolidation and green freight.</p> | <p>Comments noted. LP51 Sustainable Transport B has considered these issues.</p> | <p>LP53 Parking, Servicing and Car Free Development (Now LP51) has been updated to be in line with the London Plan.</p> |
| <p>LP54 Public Transport and Infrastructure</p> | <p>Support for improvements to suburban rail services (metroisation) would be welcomed. References to major highway improvement schemes would be welcomed e.g. Vauxhall Gyrotory (also at Section 5 Nine Elms).</p> | <p>Comments noted.</p> | <p>Policy has been amended to include reference to suburban rail services and highway improvement schemes.</p> |
| <p>Map 20.1 Cycling Routes</p> | <p>It would be useful to show how the existing and proposed Wandsworth network integrates with the Lambeth Healthy Routes Plan - https://www.lambeth.gov.uk/better-fairer-lambeth/lambeth-transport-strategy/lambeth-transport-strategy-healthy-routes-appendix.</p> | <p>Map 20.1 is intended to show all the routes which Wandsworth Council have remit over and to avoid confusion we will no be including this suggestion.</p> | <p>No changes to the Local Plan are considered necessary.</p> |

Map 5.7
BATTERSEA
DESIGN AND
TECHNOLOGY
QUARTER

BATTERSEA DESIGN AND TECHNOLOGY QUARTER

Comments noted.

No change to the Local Plan required as a result of this representation.

The Industrial Business Park designation is proposed to be removed. This will be replaced with the Battersea Design and Technology Quarter (BDTQ) designation. The BDTQ designation encompasses a larger area than the Industrial Business Park designation. (wording from Policies Map Changes Document)

The Battersea Design and Technology Quarter Cluster comprises three sites. Site Allocation (NE6, NE7, NE8)

A mix of workshops and studio uses, office space for SMEs, open space, and industrial uses including yard space and amenity space. Further information is set out within the BDTQ Economic Appraisal and Development Framework (EADF) document (2020).

Development Considerations Uses “ Industrial uses must be provided within ground floor units, unless specified within the BDTQ EADF document (e.g. hub sites). Existing B2 industrial uses (such as the Tarmac and London Concrete sites) and the bus depot should be retained and protected, which can include their re-provision within the SIL in order to provide more efficient site use and access. Beyond the Palmerston Court site, within Havelock Terrace (NE6), which lies outside of the designated SIL and has an existing permission in place for the provision of student housing, residential uses are not permitted in any areas of the site allocation.

Tall Buildings - In accordance with the Urban Design Study and the tall buildings maps in Appendix 2 the site is located in an area which has opportunities for tall buildings within a local context, and the height at which buildings will be considered as tall is 8 storeys. Development proposals for tall buildings will be assessed in accordance with Local Plan Policy LP 4.

The proposed Battersea Design and Technology Quarter would lie in reasonably close proximity to the borough boundary between Lambeth and Wandsworth. The closest of these site allocations to the boundary is NE8. Lambeth has no specific comments relating to the BDTQ.

PM3 Nine Elms Place Based Policy

PM3 Nine Elms Smart Growth

Outside of the Battersea Power Station and Vauxhall CAZ retail clusters, limited retail development will be appropriate to support the day to day needs of residents and workers. Such development should be of a small scale and must not negatively impact on the viability of development within the CAZ retail clusters.

Lambeth have some concerns with this part of the policy as it is currently written particularly regarding how it is going to be tested and implemented. How will Wandsworth ensure that there is not a dilution of retail within the Vauxhall CRC? This policy needs to have greater clarity, and needs to set out:

- What is meant by the term limited retail development?
- How will appropriate be tested?
- How will small scale be measured?
- What is meant by negative impact on the viability of development.

The vitality of the CAZ retail clusters should also be taken into account not just their viability.

Proposals for cafes, restaurants, pubs or drinking establishments, and take-away facilities which serve the needs of residents, workers and visitors will generally be acceptable, particularly where located within the focal points of activity, and where these support the twilight economy, subject to the impact on adjacent uses. In order to mitigate this, conditions may be used to control the hours of operation.

Wandsworth should ensure that town centre uses, even at small scale, outside of the defined town centre hierarchy do not detrimentally impact on retail provision in neighbouring boroughs designated town centres and CAZ retail clusters. Policies should ensure town centre uses are only considered in out of centre locations if a sequential test, and if necessary, an impact assessment, have been undertaken in line with national policy, taking account of town centres across borough boundaries. Lambeth would like to be consulted on any such schemes in Wandsworth that are in close proximity to the borough

Comments noted. Smart Growth Parts D & E is based on the approach set out within the VNEB OAPF, which specifies that – in addition to the promotion of the two CAZ retail clusters (referred to as CAZ frontages) – “small scale retail use could play a supporting role as part of residential-led mixed use development, but should perform a local function and not lead to the creation of a continuous retail theme throughout the opportunity area or become a destination in its own right”. The text further clarifies that such sites should be identified according to the sequential approach to site selection.

In turn, such uses were therefore incorporated within the Area Strategy for Nine Elms in the Council’s Site Specific Allocations Document (part of the adopted Local Plan) and were included, where applicable, as part of site allocations. This specified that retail uses that were above 300 sqm (net) were subject to the sequential test, where applicable.

Such a requirement was not initially carried forward in order to afford greater flexibility to Development Management officers to make the assessment on a case by case basis,

boundary. Such development should be of a small scale and must not negatively impact on the viability and vitality of development within town centres and CAZ retail clusters. Please see also Lambeth's comments relating to part D.

To support the important economic function of the Stewarts Road Industrial Estate, the Council will support proposals which enhance and/or intensify the industrial provision, including through improving, whether directly or through the provision of funding, the condition of the road within the industrial area, the condition of Stewarts Road bridge, and the proposed walking/cycling underpass to connect the area to the power station.

Lambeth is supportive of this but would like to highlight what is stated the SCG between the two parties: Wandsworth agrees that, in order to mitigate impact of traffic associated with the redevelopment Pensbury Place waste transfer station, it will ensure cross-border consultation on all proposals to intensify the waste uses particularly in regard to transport impacts.

however, in response to LB Lambeth's concerns, it is considered helpful to add clarity to when the sequential test should apply. Rather than taking forward the 300 sqm value, this should instead be revised to 280 sqm (net) / 400 sqm (gross), which is consistent with the Sunday trading threshold, and is the borough's locally-set threshold for the submission of an impact assessment for retail and leisure uses (when exceeded).

Following the adoption of the LB Lambeth Local Plan, which outlines a boundary for the Vauxhall CAZ Retail Cluster (identified as Vauxhall Cross), and reflecting the type of development that is coming forward, LB Wandsworth do not consider it is necessary to identify the 'Vauxhall CAZ Retail Cluster' as being located within the boundary of Wandsworth. The above approach should therefore apply to all areas of Wandsworth that are located outside of the CAZ Retail Cluster at Battersea Power Station.

It is agreed that the vitality of the CAZ retail clusters (and other centres) should be taken into account as well as their viability.