

WANDSWORTH

Duty to Co-operate Statement

Local Plan Partial Review Publication
(Regulation 19) Version
January 2025





Duty to Co-operate (DtC) Statement

Wandsworth Local Plan Partial Review (LPPR)

Advisory Note

This version of the Duty to Co-operate Statement has been published at the Regulation 19 stage to support the public consultation.

It is the Council's intention to update this document further to support the submission and subsequent Examination in Public of the Local Plan Partial Review, including to include any further activity undertaken during and after the consultation.

This version of the Duty to Co-operate Statement should be considered a draft and not a definitive record of all Duty to Co-operate activity undertaken in preparing the Local Plan Partial Review.

January 2025

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1. Introduction

- 1.1. This statement outlines how the London Borough of Wandsworth is managing the requirements of the Duty to Co-operate throughout the Local Plan Partial Review, details of which are contained in section 3.
- 1.2. The Duty to Co-operate seeks to ensure a joined-up approach is taken in plan making, where collaborative working with other relevant organisations and bodies seeks to deliver sustainable development within the administrative boundary and the wider area on an ongoing basis. This statement details the work undertaken to date and identifies how the Council is responding to the key strategic and cross boundary issues identified. The adopted Wandsworth Local Plan 2023 - 2038 has been prepared with full regard to the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG), including the Duty to Co-operate requirements. The Local Plan provides the overarching spatial strategy for Wandsworth Borough, guiding the location, scale and type of future development up until 2038.
- 1.3. Local Planning Authorities are expected to be able to provide evidence of having successfully co-operated to plan for strategic issues with cross boundary impacts when their Local Plans are submitted for independent examination. Demonstrating the Duty to Co-operate is an important part of ensuring the soundness of local plan preparation. Co-operation should be a continuous process of engagement with key stakeholders from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development within the Borough.

2. Context

Legal and Policy Context

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

National Planning Policy Requirements

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

2.4. Paragraphs 24–27 of the NPPF set out where collaboration amongst local communities and relevant bodies is expected and gives further guidance on planning strategically across local boundaries. It also requires demonstration that the plan is deliverable and is based on effective joint working on cross boundary strategic priorities. This is also reinforced in the PPG, which sets out what is required and gives further guidance on the Duty to Co-operate.

2.5. Paragraph 28 of the NPPF has also introduced a requirement to produce Statements of Common Ground (SoCG) throughout the plan-making process to document where effective co-operation is (and is not) taking place as plans are drawn up and taken through the statutory process to adoption. More information can be found in Section 6.

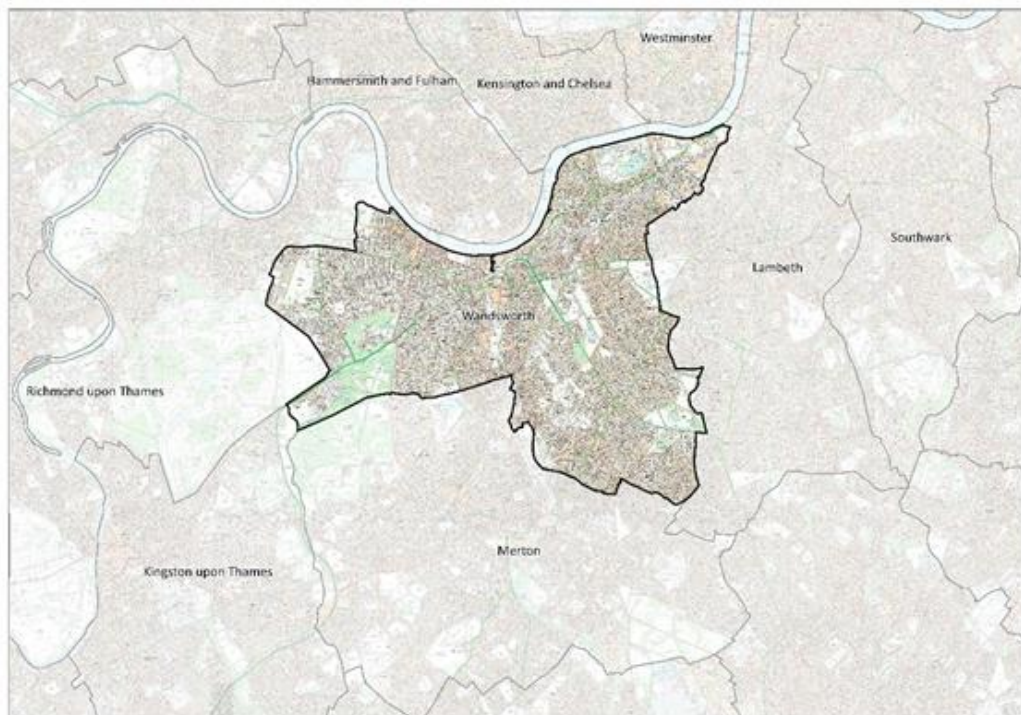
Strategic Context

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

2.7. Sitting in south-west London, Wandsworth is an inner London borough bordered by the **London Boroughs of Lambeth, Merton and Richmond** and the **Royal Borough of Kingston Upon Thames** and, across the River Thames, the **London Borough of Hammersmith and Fulham, Westminster City Council** and the **Royal Borough of Kensington and Chelsea**.

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

Map 1: The relationship between Wandsworth and neighbouring boroughs



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

Table 1: Neighbouring planning authorities' Local Plan revision status

Authority	Local Plan Status
London Borough of Lambeth	Adopted September 2021
London Borough of Kensington and Chelsea	Adopted July 2024.
Kingston Upon Thames	On hold until revised NPPF is published.
Merton	Post-hearing consultations took place between Feb and March 2024, revised Local Plan still not adopted.
Richmond Upon Thames	Examination hearings took place in June/July 2024. View to adopt late 2024/early 2025.
Hammersmith and Fulham	Local Plan adopted February 2018
Westminster	Adopted April 2021, currently undertaking a Partial Review. Regulation 19 consultation concluded on 9 May 2024.

London Context

- 2.9. As made clear in national policy and guidance, effective co-operation between the Mayor, boroughs and local planning authorities bordering London is vital to ensure that important strategic issues are planned effectively. There is a requirement for the Regulation 19 Draft Local Plan to be in conformity with the London Plan 2021. The Council works in close partnership with the Greater London Authority (GLA) and Transport for London (TfL), and all parties have taken part in meetings and correspondence throughout the production of the partially revised Wandsworth Local Plan.
- 2.10. The new London Plan 2021 was formally published by the Mayor on 2 March 2021. There is a requirement for the Wandsworth Local Plan to be in general conformity with the London Plan. Within this context, local policy approaches are appropriate and indeed London Plan policy expects these to be set out in London boroughs' local plans. However, there are certain areas where a locally distinctive approach has been taken that remains in general conformity with the London and is justified by local evidence. The Council has raised these matters with the GLA and TfL during the preparation of this Draft Local Plan. Further details can be found within Appendix B.
- 2.11. Wandsworth shares a land boundary with the boroughs of Lambeth, Merton, Kingston upon Thames, and Richmond, whilst the boroughs of Hammersmith and Fulham, Kensington and Chelsea and Westminster are located across the River Thames to the north. Wandsworth has maintained regular and open communication with neighbouring boroughs throughout all stages of the Local Plan Partial Review, including email communication, and conference/video calls with officers from neighbouring boroughs (individually and as groups). All neighbouring boroughs were invited to comment on

the Local Plan Partial Review at the Regulation 18 Stage. Following the Regulation 18 public consultation, all neighbouring boroughs were invited to attend follow-up meetings with officers to discuss any strategic matters of relevance. A record of these meetings is listed in Appendix A.

- 2.12. Planning officers from Wandsworth regularly attend meetings with the Association of London Borough Planning officers (ALBPO), including the Development Plans group and the Planning Officers' Sub-Group. These are London-wide forums for the discussion of strategic issues and include updates from each authority on key work, which may have cross boundary implications. In addition to all London boroughs these meetings include the GLA and the London Government Association.

Formal Partnerships

- 2.13. Wandsworth is a member of various formally constituted sub-regional partnerships and working groups, which address cross-border strategic matters. These are described below:

- **Wandsworth First Strategic Partnership Board** includes the Clinical Commissioning Group (now South West London Integrated Care Board) and brings together the public, private, voluntary and community sectors to work together to improve the quality of life for all who live in, work in, and visit Wandsworth.
- **Western Riverside Waste Authority (WRWA)** comprises four boroughs in the 'Western Riverside' area of London. It is responsible for disposal of household waste. The Western Riverside waste planning authorities of Wandsworth, Lambeth, Kensington & Chelsea, Hammersmith & Fulham and the Old Oak and Park Royal Development Corporation (OPDC) have been working together on waste planning since 2015.
- **The Vauxhall Nine Elms Battersea Strategy Board** was established in 2009 to provide strategic leadership for the implementation of the Opportunity Area Planning Framework for Vauxhall Nine Elms Battersea (now known as Nine Elms Vauxhall). It is co-chaired by the leaders of Wandsworth and Lambeth councils and meets bi-annually, as do subject-specific working groups. It is attended by major landowners, developers and officers of the public authorities.
- **Wandsworth Chamber of Commerce** is an organisation that brings together businesses of all sizes across the borough and provides a particularly important representative role for smaller and early-stage businesses, along with networking and advice services. The Chamber hosts over 60 business events each year and provides support for its business members via business clinics, workshops and seminars. Wandsworth Council works closely with the Chamber of Commerce as a key partner and is a long-standing Patron Member.

Wandsworth Joint working

- 2.14. Joint working also goes beyond preparing plans. Examples of this include the following:
- Legal services are also shared with other boroughs; the South London Legal Partnership is a five-borough shared legal service for the London Boroughs of Wandsworth, Richmond, Kingston, Merton and Sutton. It is not anticipated that this relationship has any implications for the local plan review.

- Wandsworth Council officers regularly attend meetings and actively contribute to the Association of London Borough Planning Officers, which provides a very useful platform for engaging with other London Boroughs on planning matters. It is not anticipated that this relationship has any implications for the local plan review.
 - There are also regular meetings with specific stakeholders and Duty to Co-operate bodies, for example, Council officers regularly meet with health bodies, including Public Health, Wandsworth Clinical Commissioning Group (now South West London Integrated Care Board), NHS England, NHS Properties Services and the London Healthy Urban Development Unit, to discuss issues relating to the emerging Local Plan, the south-west London Sustainability & Transformation Plan, the Joint Strategic Needs Assessment, and other initiatives. It is not anticipated that this relationship has any implications for the local plan review.
 - Public Practice engagement events, which involve officers from planning authorities within and outside London and provide a format for the sharing of good practice. It is not anticipated that this relationship has any implications for the local plan review.
 - Wandsworth Council officers attend the regular Housing Strategy Group, which incorporates internal and external housing colleagues, enabling officers to have a clear understanding of current housing requirements, and the current pressures on different form of housing throughout the borough. In addition, officers have used this forum to keep other forum members up to date on the progress of the local plan Partial Review and to seek feedback on the emerging policy approach and wider strategic aims relating to the Partial Review.
- 2.15. Since 1st October 2016, Richmond and Wandsworth have had a shared staffing arrangement in place. As a result, planning officers within Richmond and Wandsworth work closely, sharing the same Spatial Planning and Design Team Manager. Joint team meetings are held throughout the year where DtC issues are also discussed. This means that Richmond and Wandsworth have an ongoing dialogue on strategic planning issues impacting both boroughs.

Prescribed bodies

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

3. Wandsworth Local Plan Review

Stage 1 - Scoping Stage

- 3.1. The Council started a Partial Review of its current Local Plan in 2023. The Partial Review sets out to review and update policy LP23 Affordable Housing and other policies as they relate to strengthening the provision of homes for social rent for local people, together with any other consequential changes necessary for consistency across the plan.
- 3.2. Wandsworth Borough Council are seeking:
- To strengthen the Local Plan policy by setting out a clear policy requirement for new housing developments in the borough to provide at least 50% of dwellings as affordable homes delivered on site
 - A greater proportion of all new affordable homes to be genuinely affordable, preferably a 70/30 split in favour of social rent
 - To require affordable housing from small sites below the current threshold of 10 or more homes (gross)

Stage 2 - Pre-Publication Stage (Regulation 18)

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

Stage 3 - Publication Stage (Regulation 19)

- 3.4. The new Local Plan will form part of the development plan for the borough. Following the Regulation 18 consultation, the Council developed the partially reviewed policies, taking into account the outputs of the evidence base reports (Housing Need Assessment and Whole Plan Viability Assessment) and consultation responses. This produced the Regulation 19 version of the Plan that the Council intends to submit to the Secretary of State for Examination. An Examination in Public will then be undertaken by an independent Inspector appointed by the Secretary of State before it can be adopted by the Council. The London Plan, prepared by the Mayor of London, also forms part of the development plan, and the new Local Plan has to be in general conformity with it.
- 3.5. As part of the Shared Services that Wandsworth and Richmond work under, Richmond planners have been used to critically appraise iterations of the Draft Local Plan.
- 3.6. The latest version of the Council's Local Development Scheme, available on the Council's website, sets out the timetable for production of Wandsworth's Local Plan documents. The Local Plan Partial Review is subject to two stages of public consultation:

Stage	Dates
Pre-publication consultation (Regulation 18)	October 2023-December 2023
Publication Consultation (Regulation 19)	January 2025-February 2025

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

4. Pre-Publication Consultation (Regulation 18)

- 4.1. The Council reviewed and updated the relevant local plan policies scoped for the Partial Review whilst also taking account of the consultation responses and outcomes from Duty to Co-operate and engagement activities. The Pre-Publication Local Plan, which was the Council’s first formal draft of the revised Local Plan, was subject to public consultation from October 2023 to December 2023.
- 4.2. The Council received consultation responses to the Pre-Publication consultation from the following Duty to Co-operate bodies:
- Natural England
 - National Highways
 - NHS Property Services Ltd
 - The Mayor of London
- 4.3. After the consultation period, the representations received were considered and the Local Plan amended accordingly. Where appropriate, emails were sent to stakeholders and consultees where further information or discussion was required as a result of their comments on the Local Plan Partial Review.

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

5. Duty to Co-operate Outcomes on Strategic Matters

- 5.1. Alongside formal notification of the public consultation on the Pre-Publication Local Plan (Regulation 18), which was sent to all of the neighbouring authorities and prescribed bodies, the Council extended an invitation to all of the neighbouring authorities and certain prescribed bodies to meet with Council officers. The organisations that the invitation was extended to is recorded in Appendix A, and minutes of the meetings that were held is recorded in Appendix B.
- 5.2. The Council considers this demonstrates that positive engagement through the Duty to Co-operate has resulted in regular exchanges of information, particularly sharing evidence base and updates to policy approaches, and has informed the preparation of the Local Plan.

6. Statement(s) of Common Ground

- 6.1. Paragraph 28 of the NPPF introduced (as part of the DtC process) a requirement for strategic policy making authorities to, 'prepare and maintain one or more statements of common ground (SoCG) documenting the cross-boundary matters being addressed and progress in co-operating to address these.' This is required 'in order to demonstrate effective and on-going joint working.' The purpose of the SoCG is to document cross-boundary matters and progress in co-operating to address them. It demonstrates that the Local Plan is based on effective and ongoing co-operation and that LPAs have sought to produce strategies that as far as possible are based on agreements with other authorities. The SoCG should be produced, published and kept up to date by the signatory authorities as an accessible and public record of where agreements have or have not been reached on cross boundary strategic issues.
- 6.2. Due to the recent adoption of the Full Local Plan (2023) and limited scope of the Partial Review, the Council do not consider it necessary to prepare an additional SoCG with neighbouring authorities at this stage, especially as no major issues were raised during the plan preparation stage to date. This will be kept under review and the Council will prepare SoCG with any body where this will be constructive to the next stages of the process.

7. Engagement with Waste Planning Authorities

- 7.1. Due to the nature and scope of the Local Plan review, the Council did not see it necessary to undertake specific engagement with waste planning authorities.

8. Conclusion

- 8.1. During the 2023/2024 Local Plan Partial Review, the Council has engaged actively with the necessary stakeholders and partners through discussion on strategic matters. The Draft Local Plan published under Regulation 19 (Town and Country Planning Act (Local Planning) (England) Regulations 2012) reflects the views and comments received during the engagement and co-operation process.

- 8.2. This report, and the draft Statement of Consultation, demonstrate how the Council has complied with its Duty to Co-operate and will be updated, and subsequently used, during the Examination in Public to show that the outcome of the Local Plan Partial Review is based on effective joint working across local authority boundaries. The Duty to Co-operate Statement will be updated prior to submission of the Local Plan to take account of new meetings and ongoing engagement made under the upcoming consultation with key stakeholders and partners.

- 8.3. The Council has maintained detailed records of its compliance with the Duty to Co-operate and will make these available where required to assist in the next stages of the Local Plan Partial Review.

Appendix A - Schedule of co-operation with statutory stakeholders (pre-Regulation 19)

Ref.	Organisation	Correspondence sent	Meeting/ Response Date	Correspondence Received (Y/N)	Notes
Prescribed Bodies					
1	Environment Agency	09.05.2024	n/a	Y	The Environment Agency had no comments to make at this stage.
2	Historic England	Comment received as part of Reg 18 consultation	n/a		<p><i>Thank you for the opportunity to comment on the above consultation. As the Government's adviser on the historic environment, Historic England is keen to ensure that the conservation and enhancement of the historic environment is taken fully into account at all stages and levels of the Local Plan process.</i></p> <p><i>This Partial Review focuses solely on Policy LP23 (Affordable Housing) and other policies which relate to strengthening provision of homes for social rent. The Regulation 18 is very high-level, and the proposed scope does not appear to have any implications for the historic environment. If any specific heritage issues arise as a result of the consultation, please not hesitate to contact us. We would also like to be consulted again at Regulation 19 stage, by which time more detail should be published, and we will be in a position to reassess the proposals in case any heritage issue do develop.</i></p> <p><i>It should be noted that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially Object to any specific development proposal which may subsequently arise from these documents, and which may have adverse effects on the environment.</i></p>
		09.05.2024	n/a	Y	<p><i>Thanks for getting in touch regarding the Local Plan Partial Review and the forthcoming duty to co-operate meetings.</i></p> <p><i>Given the nature of the review, we do not foresee any historic environment issues (please see our letter attached) and will not be attending. Please do let us know if things change and any historic environment implications should arise.</i></p>
3	Natural England	09.05.2024	06.06.2024		<p>LBW provided an update on the status of the Partial Review.</p> <p>Natural England noted that on local plan reviews, the main issue arising for Natural England tends to be the Habitat Regulations Assessment. LBW previous HRA only goes as far as the screening stage, but there is some mention of mitigation at the screening stage – Natural England noted that any kind of mitigation needs to come at the appropriate assessment stage and if</p>

Ref.	Organisation	Correspondence sent	Meeting/ Response Date	Correspondence Received (Y/N)	Notes
					<p>the HRA is revisited as part of the Partial Review, LBW could make wording more robust. Natural England stated they are updating their guidance to match as closely to the regulations as possible and it would be helpful if the HNA could match this approach.</p> <p>LBW also provided an update on the Clapham Junction Masterplan and Natural England raised that this would provide a good opportunity to consider nature recovery and corridors. LBW were informed the National Trust are undertaking some work along the River Wandle which links to nature recovery.</p>
			n/a	Y	<p>Following the meeting on 6th June, Natural England sent over a paragraph which summarises the position on the inclusion of mitigation as part of the HRA process which was discussed in the meeting –</p> <p><i>Please note that, recent case law ('People Over Wind') outlines that mitigation measures should not be assessed through an HRA to 'screen out' impacts at the stage of considering Likely Significant Effects (LSE), rather avoidance / mitigation measures should be considered through an Appropriate Assessment. Therefore where mitigation measures are proposed to avoid a likely significant effect, your authority's HRA will need to include an Appropriate Assessment under Regulation 63(1) of The Conservation of Habitats and Species Regulations 2017 (as amended). Please note Natural England are a statutory consultee for Appropriate Assessments and should be re-consulted once your authority has completed its HRA.</i></p>
		10.10.2024	21.10.2024	Y	Natural England provided feedback on a draft of the Regulation 19 HRA Screening Report shared by Wandsworth Council. Feedback included comments on the methodology section, the 'types of impact' section and air quality section.
		22.10.2024	24.10.2024	Y	<p>LBW met with Natural England to discuss the Regulation 19 HRA and the feedback given on the initial draft.</p> <p>Natural England recommended that Section 5 – Types of Impacts could be less detailed due to the fact that the policy proposals are unlikely to result in any new development, meaning the partial review could largely rely on the findings of the 2022 HRA undertaken for the Adopted Local Plan (2023)</p>
4	The Civil Aviation Authority	Comment received as part of Reg 18 consultation	n/a		The Council considers that there are no strategic issues of relevance to discuss with the Civil Aviation Authority. The CAA is a statutory consultee and is consulted on all the Council's planning policy documents, including the Local

Ref.	Organisation	Correspondence sent	Meeting/ Response Date	Correspondence Received (Y/N)	Notes
					Plan; however, it was not thought to be necessary to hold specific duty to co-operate meetings or other engagement activities beyond the normal statutory consultation procedures with the CAA.
		05.06.2024	n/a	N	
5	Homes England (previously HCA)	05.06.2024	n/a	N	
6	Clinical Commissioning Groups (CCGs) – Wandsworth Borough Estates Group	05.06.2024	n/a	N	
7	Transport for London	09.05.2024	n/a	Y	<i>My understanding is that the Partial Review is limited to affordable housing and related policies and wouldn't affect other parts of the Local Plan such as transport, area policies or site allocations which would be of interest to TfL. If this is still the case I don't think there is a need to arrange a Duty to Co-operate (DtC) meeting. If you need to demonstrate that DtC requirements have been met, there could be an exchange of correspondence confirming the limited nature of the review</i>
8	National Highways (formerly Highways Agency)	09.05.2024	n/a	Y	No meeting held - <i>We are of course happy to meet with you but as the closest part of our network to Wandsworth Borough is the M4, M11 and M3 (outside of the borough) it may be that we are not well placed to add any value during a meeting.</i>
9	The Marine Management Authority	09.05.2024	12.06.2024	N	LBW provided an update on the status of the Partial Review. The MMO plans to undertake engagement and implementation sessions with local authorities related to the South East Marine Plan. The MMO and LBW agreed that the Partial Review has very limited impact on the operations of the MMO, but where new development is proposed along the shoreline and any industrial areas, LBW agreed to engage with the MMO. LBW also provided an update on the status of the Clapham Junction masterplan.

Ref.	Organisation	Correspondence sent	Meeting/ Response Date	Correspondence Received (Y/N)	Notes
10	The Office of Rail Regulation	Comment received as part of Reg 18 consultation	n/a	Y	The Council considered that there were no strategic issues of relevance to discuss with the Office of the Rail Regulation, which is a statutory consultee and is consulted on all the Council's planning policy documents, including the Local Plan; however, it was not thought to be necessary to hold specific duty to co-operate meetings or other engagement activities beyond the normal statutory consultation procedures with this Office.
		09.05.2024	N/A	Y	<i>Thank you for your emails of 9th and 14th May regarding a Partial Review of the local plan through the Duty to Co-operate process. It would seem that what you're looking to discuss primarily relates to housing issues which is outside the remit of the Office of Rail and Road (ORR).</i>
11	Greater London Authority (GLA)		23.01.2024	N	<p>WBC provided an overview of the Local Plan review and the Reg18 responses received to date.</p> <p>The GLA expressed a potential concern over any disapplication of threshold / fast track approach, however GLA not completely opposed to changes which provide a locally justified approach to the London Plan where this leads to an increase in affordable housing delivery but requires strong evidence.</p> <p>GLA showed a willingness for flexibility on the threshold approach as long as evidence demonstrates any flexibility would not harm affordable housing supply.</p> <p>GLA general position is that the existing threshold approach increases affordable housing overall and speeds up the planning process, and that any disapplication could have the unintended consequence of reducing affordable housing delivery by requiring more schemes to go through the viability tested approach.</p>
		09.05.2024	07.06.2024	N	<p>LBW provided an update on the status of the Partial Review.</p> <p>GLA noted they had no objections in principle to the small site or tenure split aspirations and noted the only potential issue is with regards to exceeding the 35% affordable housing threshold set out in the London Plan. The GLA noted they have robust evidence that the threshold approach works well and is delivering good numbers of affordable housing – the GLA emphasised that because of the extent of evidence they have to support this policy, it would be challenging for a borough to challenge this. The GLA also have evidence to</p>

Ref.	Organisation	Correspondence sent	Meeting/ Response Date	Correspondence Received (Y/N)	Notes
					<p>demonstrate that applications which go down the viability tested route, the fewer affordable housing units are delivered.</p> <p>GLA emphasised the difficulty of looking at one policy area in isolation as part of a local plan review.</p> <p>GLA are undertaking a SHLAA update (Land4London) and will also be publishing their updated Gypsy and Traveller Needs Assessment in Summer 2024.</p> <p>In terms of student housing, the GLA advised LBW to look at Islington's draft policy which focussed on prioritising conventional housing which is the approach LBW members wish to pursue. Meanwhile, the GLA noted there is evidence to show that PBSA frees up HMO units. The GLA noted that it is better to work with the PBSA sector and use policy allocations to control PBSA numbers. The GLA hope to publish their Student Housing LPG in August, amongst other LPG's.</p> <p>LBW updated on the Clapham Junction masterplan.</p>
		15.08.2024	18.09.2024	N	<p>LBW provided an update on the status of the Partial Review, and progress made since previous meeting.</p> <p>LBW presented the GLA with draft policy wording for LP23, LP24 and LP28 and discussed rationale and evidence behind choice of policy wording to meet LBW ambitions.</p> <p>GLA raised no specific objections to LP24 and LP28, however did note that they may have concerns over LP23, which could amend the London Plan policy threshold approach.</p>
		12.11.2024	10.12.2024	N	<p>LBW provided an update on the status of the Partial Review, and progress made since last meeting on the evidence base and the 19th November transport committee decision.</p> <p>The GLA highlighted a potential concern over the proposed wording for LP23 which would introduce an alternative threshold to the London Plan approach.</p>
12	Integrated Transport Authority	n/a	n/a	N	<p>The Council is the Highways Authority for the area. Due to the scope of the review, the Council's transport planners have had peripheral involvement in the Local Plan review. Maximising S106 contributions towards housing is not</p>

Ref.	Organisation	Correspondence sent	Meeting/ Response Date	Correspondence Received (Y/N)	Notes
					expected to materially impact on the delivery of transport improvements necessary to support sustainable growth.
Additional Bodies					
13	Port of London Authority	09.05.2024	07.06.2024	N	<p>LBW provided an update on the status of the Partial Review.</p> <p>PLA noted that their main concerns would be regarding protected walks and riverside paths along the Thames – should these items come into question, the PLA would like to be consulted. The PLA also requested to be consulted where potential future development is proposed in proximity to the boroughs safeguarded wharves, and with regards to the potential Pimlico bridge development in the borough.</p> <p>PLA noted that in 2022 they published their Thames Vision document and have been undertaking work on the masterplan on a borough-by-borough basis with planning policy and regeneration officers and sometimes transport officers. PLA noted their minor engagement with members in boroughs to date, and also noted that the GLA and TfL have been involved in the process to ensure PLA ambitions align with TfL and GLA ambitions.</p>
14	Local Enterprise Partnership	05.06.2024	n/a	N	
Neighbouring Authorities					
15	Hammersmith & Fulham		25.01.2024	N	<p>WBC provided an overview of the Local Plan review and the Reg18 responses received to date.</p> <p>LBHF considered it unlikely that there would be significant cross-boundary issues with the Local Plan Partial Review and noted they were positive about Wandsworth pursuing greater affordability.</p>
		09.05.2024	27.06.2024	N	<p>WBC provided an overview of the Local Plan review and the Reg18 responses received to date.</p> <p>LBHF also noted they were looking into student accommodation policy, and there was a discussion on applications for hotels.</p> <p>LBHF updated on their local plan preparations and noted they would be conducting their own DtC meetings later this year.</p>
16	Kensington & Chelsea		18.01.2024	N	WBC provided an overview of the Local Plan review and the Reg18 responses received to date.

Ref.	Organisation	Correspondence sent	Meeting/ Response Date	Correspondence Received (Y/N)	Notes
					RBKC outlined their 70:30 split in favour of social rent with threshold of 650m ² – this was not aligned with NPPF, and RBKC did not receive extensive objections including from the inspector. Noted that both authorities are looking to update Planning Obligations and Affordable Housing SPD's as part of respective plan reviews.
		09.05.2024	11.06.2024	N	<p>LBW provided an update on the status of the Partial Review.</p> <p>Regarding student accommodation, RBKC noted that their student accommodation policy was viewed negatively during the examination stage as it was not positively worded and was not evidenced enough. The inspector recommended changing policy wording to be more positive.</p> <p>RBKC also noted that they attempted to adopt a similar small sites approach to that proposed by LBW and at examination stage this was questioned and amended to a unit-based approach rather than an area approach of 650sqm or less.</p> <p>LBW provided an update on the Clapham Junction Masterplan works.</p> <p>RBKC noted they are awaiting the inspectors report following examination of their Local Plan review last year – this is likely to be following 4th July general election. RBKC also stated they were hoping to publish borough-wide design code and other SPD's following general election.</p> <p>RBKC confirmed they had no further comments to make on the LBW Partial Review.</p>
17	Kingston		23.01.2024		<p>WBC provided an overview of the Local Plan review and the Reg18 responses received to date.</p> <p>KuT to share their updated LHNA when available, and their emerging WPVA suggesting that small sites contribution is viable and supports 70:30 tenure split.</p>
		09.05.2024	10.06.2024	N	LBW provided an update on Partial Review status.

Ref.	Organisation	Correspondence sent	Meeting/ Response Date	Correspondence Received (Y/N)	Notes
					<p>KuT queried the production of a SoCG and LBW noted the approach to SoCG is yet to be defined.</p> <p>LBW provided an update on the Clapham Junction Masterplan.</p> <p>KuT noted there were no cross-boundary issues to raise at this stage.</p> <p>KuT stated they were also undertaking a local plan review and that their ambitions were similar to LBW.</p> <p>KuT noted that Wandsworth falls into the catchment for the KuT retail and leisure needs assessment but that the assessment shows KuT catchment area is decreasing and town centre spending has reduced.</p> <p>KuT raised their unmet housing need and noted that this could be covered in a SoCG later down the line.</p>
			01.10.2024	N	<p>KuT provided an update on their local plan process, and noted their Reg19 consultation which was due to begin in November 2024 is delayed due to the NPPF consultation.</p> <p>KuT provided an update on their housing need and target and expressed concern around whether the sites they have put forward will be considered deliverable under the revised NPPF.</p> <p>KuT provided an update on their employment and retail land, and stated they may have unmet need for retail and employment.</p> <p>KuT provided an update on their Gypsy and Traveller Pitches and noted they were struggling to find suitable sites to meet their need for Gypsy and Traveller pitches.</p> <p>KuT provided an update on their plans for future Duty to Co-operate collaboration and LBW expressed support for a more formal timetable of meetings or the establishment of a working group.</p> <p>LBW provided an update on the Local Plan Partial Review.</p>
18	Lambeth		20.02.2024		<p>WBC provided an overview of the Local Plan review and the Reg18 responses received to date.</p>

Ref.	Organisation	Correspondence sent	Meeting/ Response Date	Correspondence Received (Y/N)	Notes
					WBC do not foresee any cross-boundary implications with the single issue review.
		09.05.2024			LBW provided an update on Partial Review status. LBL noted they were supportive of efforts to maximise affordable housing delivery. LBL noted their members were also looking to maximise affordable housing delivery and expect to undertake a similar review to Wandsworth. LBW gave an update on the Clapham Junction Masterplan and LBL noted that they are undertaking a similar project with Waterloo railway station.
19	Merton	n/a	24.02.2024		WBC provided an overview of the Local Plan review and the Reg18 responses received to date. LBM advised that Merton's emerging policy similarly requires 70% low-cost rent, 30% intermediate tenures, with a 50% strategic target
		09.05.2024	06.06.2024	N	LBW provided an update on Partial Review status. LBM are pursuing a similar affordable housing policy approach. LBM have a viability-based approach in policy but are working towards a price per unit approach to avoid the need for viability testing to simplify the process. LBW provided an update on the Clapham Junction Masterplan. LBM updated on their local plan – this was submitted in December 2021 and still in the examination period and waiting for the inspectors reports. Reasoning for this is a high number of queries from examiners and an ongoing struggle to meet Merton housing targets in addition to unmet needs from covid pandemic.
20	Richmond upon Thames	n/a	n/a	Y	Richmond and Wandsworth have had a shared staffing arrangement in place. As a result, planning officers within Richmond and Wandsworth work closely, sharing the same Spatial Planning and Design Team Manager. Joint team meetings are held throughout the year where DtC issues are also discussed.
21	Westminster	n/a	13.02.2024	n/a	WBC provided an overview of the Local Plan review and the Reg18 responses received to date.

Ref.	Organisation	Correspondence sent	Meeting/ Response Date	Correspondence Received (Y/N)	Notes
					<p>WCC also undertaking Partial Review of their city plan focussed on three main elements (review affordable housing policy, introduce four new allocations and make changes to sustainability requirements).</p> <p>WCC shortly going to Reg 19 (mid-March) on their review – new affordable housing has a 70:30 split in favour of social rent and also added in small sites (payments in lieu). Recognised current economic climate not great.</p> <p>WCC looking to challenge London Plan portfolio approach and may look to take a cascade method instead where alternative Westminster sites must be used first.</p>
		09.05.2024	12.06.2024	N	<p>LBW provided an update on Partial Review status.</p> <p>WCC is progressing with a Partial Review focussed on retrofitting, affordable housing and site allocations. Their most significant opposition is from developers regarding their retrofit-first policy. They are also reviewing concerns around viability and WCC are considering a sliding-scale approach for small sites affordable housing provision, and this was the industry preference.</p> <p>In terms of publishing their updated policy, WCC are presenting this as a new policy, combined with minor updates as tracked changes but much of the old text will remain.</p> <p>LBW provided an update on the Clapham Junction Masterplan and it was agreed that it is unlikely for there to be any impact on potential views and townscapes.</p> <p>WBC queried the future of the Grosvenor sidings site which is allocated in Westminster review but this was uncertain.</p>

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

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

For more information write to:
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