



Wandsworth Local Plan Partial Review

Statement of Common Ground between:

- (i) London Borough of Wandsworth and
- (ii) London Borough of Hammersmith and Fulham

May 2025

Executive Summary

A Statement of Common Ground (SoCG) is a written record of the progress made by strategic policy making authorities during the process of planning for cross-boundary matters. This SoCG has been prepared to demonstrate that the Wandsworth Local Plan Partial Review (LPPR) is '*based on effective joint working on cross-boundary strategic matters*', in accordance with the requirements of Paragraph 36 of the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG) chapter on Plan-making¹ (Maintaining Effective Co-operation).

This SoCG focuses on any strategic cross boundary matters being addressed between the London Borough of Hammersmith and Fulham and the London Borough of Wandsworth relating to strategic cross-boundary matters covered in the Wandsworth Local Plan Partial Review.

¹ [Plan-making - GOV.UK](#)

1. Overview

- 1.1. The Wandsworth Local Plan (2023-2038) was formally adopted in July 2023 following an examination in public in November 2022 by inspectors appointed by the Secretary of State. In response to the significant need for affordable housing in the Borough, Wandsworth Council (the Council) has initiated a partial review of the adopted Local Plan. This review aims to strengthen its affordable housing policy. Additionally, it includes changes to policies relative to housing mix, student accommodation, specialist housing for older people, build-to-rent properties and housing with shared facilities.
- 1.2. Wandsworth and the London Borough of Hammersmith and Fulham share borders and work in partnership to ensure a coordinated approach to cross-boundary strategic matters.
- 1.3. This SoCG records the outcomes of engagement between the London Borough of Hammersmith and Fulham and Wandsworth Council relating to the preparation of the Wandsworth Local Plan Partial Review and, where relevant, any other live strategic matters. It summarises the collaboration between the two parties on strategic matters, ensuring that policies are appropriately justified and effectively address strategic or cross-boundary challenges.
- 1.4. The Council has routinely prepared and agreed Statements of Common Ground as part of its own plan-making processes, and in relation to those being delivered by others. The Council has agreed Statements of Common Ground with the London Borough of Hammersmith and Fulham in the past. This SoCG partially supersedes these previous statements insofar as they were agreed prior to the Wandsworth Local Plan Partial Review.

2. Legislation and Policy Background

- 2.1. The Localism Act 2011 introduced a "Duty to Cooperate" into the Planning & Compulsory Purchase Act 2004. This duty requires local planning authorities, county councils, and other statutory bodies to actively engage and collaborate on strategic matters. Section 110 of Section 33A, entitled "Duty to Cooperate in relation to planning of sustainable development", in the Planning & Compulsory Purchase Act 2004 defines cooperation on 'strategic matters' to be:
 - sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is

strategic and has or would have a significant impact on at least two planning areas;”

- sustainable development or use of land in a two-tier area if the development or use – is a county matter or has or would have a significant impact on a county matter.”

2.2. The National Planning Policy Framework (NPPF) (2024) (Paras 20-24) sets out the requirements and guidance that the Local Plan will be tested against. This includes cooperation on ‘strategic priorities’, in delivering:

- a) homes (including affordable housing), employment, retail, leisure and other commercial development
- b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat)
- c) community facilities (such as health, education and cultural infrastructure)
- d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.

2.3. Paragraphs 24 to 27 of the NPPF (2024) state that strategic planning plays a vital role in ensuring sustainable growth and strategic policy-making authorities should work collaboratively on strategic matters that need to be addressed within the plan. This includes where applicable working with ‘*Local Nature Partnerships, the Marine Management Organisation, county councils, infrastructure providers, elected Mayors and combined authorities*’ (Para 25).

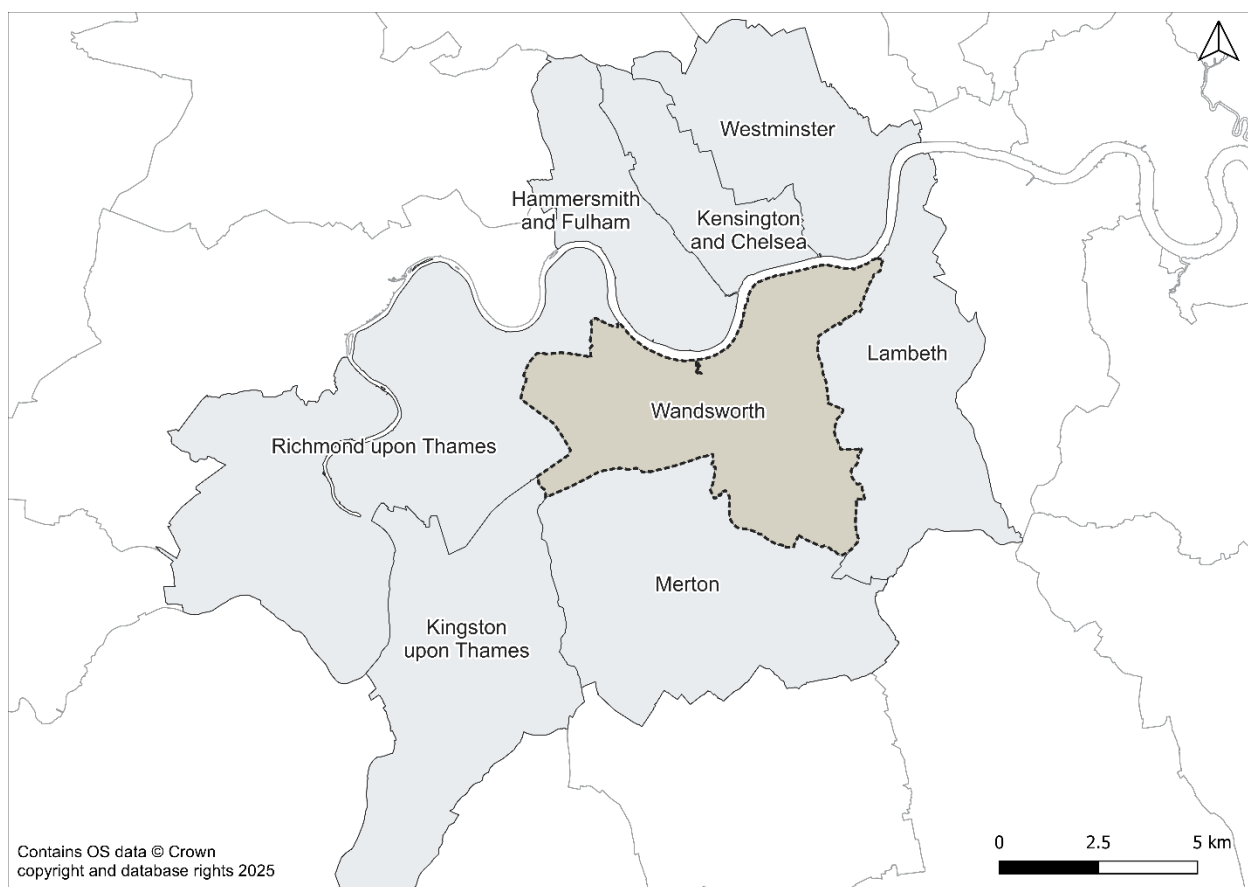
2.4. Planning Inspectors are required to test legal compliance with the Duty to Cooperate legislation and all other legal requirements alongside the wider tests of the Plan’s ‘soundness’.

3. Legal Duty to Cooperate

- 3.1. The London Plan (2021) expresses the need for collaboration between boroughs on strategic issues that go beyond the scope of borough boundaries. Wandsworth Borough Council and other public bodies have routinely and effectively cooperated on cross-boundary and strategic matters.
- 3.2. Co-operation can take many forms which are effective in different contexts. The Council and other prescribed bodies for the purpose of the Duty to Cooperate co-operate effectively through shared participation in a range of strategic or cross-boundary forums. These forums include:
 - The Association of London Borough Planning Officers (ALBPO)
 - London Councils
 - Specific projects or workstreams overseen by the Greater London Authority (GLA)
- 3.3. The Council and other prescribed bodies also achieve effective co-operation through ongoing informal liaison and the holding of periodic or ad hoc meetings between officers which ensure issues are monitored and addressed collaboratively.
- 3.4. In scoping the Wandsworth Local Plan Partial Review, the Council has generally not identified or foreseen significant strategic or cross-boundary matters. Given the relatively limited scope of the Wandsworth Local Plan Partial Review, a majority of the co-operation with other prescribed bodies has been achieved effectively through periodic and/or ad hoc meetings and through formal consultation responses. Updates have also been provided at meetings of some of the strategic forums listed above.
- 3.5. Where advice or feedback has been provided, either through informal liaison or formal consultation responses, the Council has given these appropriate weight and used these to inform the drafting of policies as part of the Wandsworth Local Plan Partial Review.

4. Strategic Geography

- 4.1. Wandsworth is an inner-London Borough located in south-west London and is bordered on the northern edge by the river Thames with the London Borough of Lambeth to the east, London Borough of Merton to the south and London Borough of Richmond Upon Thames to the west.
- 4.2. Figure 1 below shows Wandsworth Borough in relation to adjoining Boroughs.
- 4.3. As shown by Figure 1, the London Borough of Hammersmith and Fulham is located to the north of Wandsworth across the River Thames. The two boroughs do not share a land boundary.



5. Wandsworth Local Plan Partial Review

- 5.1. The Wandsworth Local Plan Partial Review underwent Regulation 18 consultation from 23 October to 4 December 2023, followed by a Regulation 19 consultation from 13 January to 24 February 2025. The draft policies within the Local Plan that are relevant to the Wandsworth Local Plan Partial Review include:
- Policy LP23 Affordable Housing
 - Policy LP24 (Housing Mix)
 - Policy LP28 (Purpose Built Student Accommodation)
 - Policy LP29 (Housing with Shared Facilities)
 - Policy LP30 (Build to Rent)
 - Policy LP31 (Specialist Housing for Vulnerable and Older People)
- 5.2. All other policies within the Local Plan are proposed to remain as existing in the adopted Wandsworth Local Plan (2023-2038).
- 5.3. The following sections give an overview of the main changes proposed to each of the above listed policies.

Affordable Housing (Policy LP23)

- 5.4. Draft Policy LP23 aims to address the affordable housing needs in Wandsworth as detailed in the Housing Needs Assessment (2024). Draft Policy LP23 sets a strategic target of 50% of new homes (by habitable room) to be affordable. It requires an affordable housing tenure split of a minimum of 70% social rent and maximum of 30% intermediate housing. The threshold for the Council's Fast Track Route is set at 45% for private sites, and 50% for public sector land and strategic or local industrial locations.
- 5.5. Additionally, the draft policy requires financial contributions towards affordable housing from small sites with 9 or fewer dwellings of £50,000 per dwelling calculated on a gross basis.
- 5.6. Developments that are unable to meet these requirements must submit viability evidence and follow the Viability Tested Route (VTR).

Housing Mix (Policy LP24)

- 5.7. Draft Policy LP24 slightly reduces the proportion of one-bedroom homes sought from market housing and re-balances towards family-sized homes (two or more bedrooms), which are most needed in Wandsworth. This adjustment aims to address the high demand for larger homes suitable for families.

- 5.8. The housing mix policy has also been updated to require a greater proportion of one- to two-bedroom intermediate homes. These changes are intended to ensure that the housing mix aligns with the current needs and income levels of residents, providing a more balanced and accessible range of housing options across the borough.

Purpose Built-Student Accommodation (Policy LP28)

- 5.9. Draft Policy LP28 proposes that Purpose-Built Student Accommodation (PBSA) is only suitable on land which is unsuitable for conventional housing. This measure aims to prioritise the use of available land for conventional housing, including conventional affordable housing.
- 5.10. Additionally, Draft Policy LP28 has been revised to require developers of PBSA to make a contribution towards affordable housing. This requirement aligns with draft Policy LP23, ensuring that the development of student accommodation also supports the wider goal of increasing the availability of affordable housing in the borough.

Housing with Shared Facilities (Policy LP29)

- 5.11. Draft Policy LP29 has been updated to require developers of housing with shared facilities to make a financial contribution towards conventional affordable housing in line with draft Policy LP23.

Build to Rent (Policy LP30)

- 5.12. Draft Policy LP30 has been updated to require developers to make a higher proportion of units available as conventional affordable housing, in line with Draft Policy LP23. This means that affordable units must be delivered on-site whenever possible. If on-site delivery is not feasible, developers are required to provide affordable housing on another site. If neither option is possible, developers must make a financial contribution towards affordable housing.

Housing for Vulnerable People and Older People (Policy LP31)

- 5.13. Draft Policy LP29 has been updated to require developers of housing with shared facilities to make a contribution towards conventional affordable housing in line with draft Policy LP23.

6. Statement of Common Ground

- 6.1. The Council and the London Borough of Hammersmith and Fulham agree on the following statements:
- i. No cross-boundary or strategic matters arising from the Wandsworth Local Plan Partial Review have been identified through co-operation between the parties
 - ii. In relation to co-operation between the parties, both parties are satisfied that Wandsworth Council has fulfilled its legal duty to co-operate in the preparation of the Wandsworth Local Plan Partial Review
 - iii. The parties which are signatories to this Statement have co-operated effectively and on an ongoing basis throughout the preparation of the Wandsworth Local Plan Partial Review

7. Evidence and Outcomes of Co-operation

- 7.1. A list of meetings held between the Council and the London Borough of Hammersmith and Fulham in relation to the Wandsworth Local Plan Partial Review are below:
- 25th January 2024
 - 27th June 2024
 - 16th January 2025
- 7.2. Specific outcomes of co-operation between the parties are:
- LB Wandsworth and LB Hammersmith and Fulham shared information about the ongoing work on the Local Development Plans of the respective boroughs.
 - LB Hammersmith and Fulham expressed support towards the efforts by Wandsworth Council to pursue greater housing affordability through its Local Plan Partial Review.

8. Governance Arrangements

- 8.1. The parties are responsible for reviewing and signing this SoCG in line with their own governance arrangements.

9. Timetable for Review

- 9.1. The parties note the Council's current Local Development Scheme timetable for the Wandsworth Local Plan Partial Review.
- 9.2. The parties expect the SoCG to expire six months from adoption of the Wandsworth Local Plan Partial Review and/or the superseding of this document by a new SoCG agreed by both parties, whichever is sooner.

Statement of Common Ground

LB Wandsworth and LB Hammersmith and Fulham

May 2025

10. Signatures



Name: Adam Hutchings

Date: 28/05/2025

On behalf of the London Borough of Wandsworth

Name: David Gawthorpe

Date: 08/05/2025

On behalf of the London Borough of Hammersmith and Fulham

Wandsworth Local Plan Partial Review

Duty to Co-operate Meeting with Hammersmith and Fulham

25.01.2024

Attendees:

- Richard Crutchley (RC) – Wandsworth (WBC)
- Daniel Goodman (DGo) - WBC
- David Gawthorpe (DGa) – Hammersmith and Fulham (LBHF)
- Sarah Dixey (SD) – LBHF

Discussions:

Updates on Wandsworth Local Plan Partial Review

- RC introduced the purpose of the meeting - to update LBHF on the Wandsworth Local Plan Partial Review.
- RC gave background and context to the Local Plan Partial Review. WBC submitted their plan for examination in 2022. Whilst the Local Plan was adopted in July 2023, this was followed by an immediate review focussed on affordable housing.
- RC advised that a single page Regulation 18 consultation was held late last year focussed on three main ambitions:
 - To seek a 50% affordable housing contribution from developments
 - To change the tenure split to 70:30 in favour of social rent
 - To start requiring affordable housing contributions from small sites (<10 dwellings)
- No policy or evidence published as part of the Reg 18
- Around 230 responses received, of which around 40% from small developers, handful from agents and professionals, residents and community groups.
 - Majority of responses were opposed, with some general support from residents and community groups.
 - Many small developers used a templated response.
 - Opposition from small developers focussed on the ambition to scope small sites into affordable housing requirements.
 - Opposition from larger developers focussed on the ambition to increase the overall affordable housing requirement to 50%
- DG outlined WBC's intention to procure two main pieces of evidence over the next 6 weeks – a Housing Needs Assessment and a Whole Plan Viability Assessment (WPVA). WBC recognise the importance of the WPVA in particular to test / demonstrate the deliverability of the policy objectives. WBC also considering bespoke evidence around small sites.
- Reg 19 consultation expected towards the end of the year.
- DGo summarised the GLA response to the Reg 18 consultation – potential risk of non-conformity raised but mutual understanding that this will need to be explored through

the evidence base. There are other authorities who have successfully justified an approach similar to what WBC are looking to achieve.

- SD asked whether the policy would also scope in student accommodation or serviced apartments – LBHF receiving speculative applications not tied to HE provider.
 - Will be explored in evidence base. WBC have responded to recent LPG raising need for more focussed approach to needs being met.
- SD asked if WBC had done any work on plans to use commuted sums for affordable housing. WBC expect detail to come from Steering and Working Group meetings.
- Likewise, the Steering and Working Groups will be important to identify which housing products are most wanted beyond the headline of the 70:30 split.
- WBC have made a commitment to building 1,000 Council homes.
- Climate change becoming increasingly important at WBC too. WBC are looking at how to best retrofit, incorporate offsetting, carbon costs etc.
- WBC are looking to keep the scope of the review narrow but conscious of scoping any indirect impacts on other policy areas, some of which might have a cross-boundary impact (e.g. tall buildings)
- WBC are about to appoint a new viability officer.
- The Wandsworth WPVA will be led by a new consultant / contract.
- RC advised that the small site target for Wandsworth is around a fifth of the overall London Plan target and understood this was largely being met. WBC have confidence small site objectives around affordable housing would not have an impact on supply.
- WBC have a reasonably strong housing supply, although acknowledge it is less clear what happens after the London Plan Review
- All acknowledged that the Secretary of State has written to the GLA to instigate London Plan review. GLA confirmed they will look to start the review as soon as possible.
- DGo updated on the discussions at the recent meeting between boroughs and the Expert Panel who are reviewing how London Plan impacts upon brownfield site delivery.

Updates from LBHF

- LBHF are not currently pursuing a Local Plan review but will shortly begin evidence gathering. Plan to scope Local Plan Review once more known about new regs.
- Climate change is a high priority for LBHF. LBHF recently had a meeting with Members around Carbon Offset fund value. Currently using London Plan value but actual cost to Council much greater – therefore looking to raise; hoping to achieve outside of Local Plan
- LBHF consider it unlikely there will be significant cross-boundary issues with the Local Plan Partial Review – positive about Wandsworth pursuing greater affordability, will monitor for more indirect impacts (e.g. building heights)
- LBHF about to commission a Student Accommodation Supply and Demand Study – will share brief with WBC
- LBHF have just adopted Climate Change SPD (Nov 23), most of which is good practice features outside of planning – some of the bits that were not suitable for the SPD are on the website in a ‘hub’ format
 - Wandsworth have been approached by climate change team to produce Climate Change SPD; may be useful to share best practice.
- LBHF have also been working on a Hammersmith Town Centre SPD

- LBHF working on Article 4 directions – taken quite a forensic approach acknowledging difficulty other Boroughs have had in satisfying DLUHC, hoping to consult soon
 - Wandsworth and Richmond some of the first to get Article 4s through

AOB

- WBC aware that any General Election could impact upon ability to meet consultation expectations later, this will be kept under review
- Mayoral elections are not considered likely to affect upon timescales
- Authorities agreed to meet again at Regulation 19 stage

Wandsworth Local Plan Partial Review
Duty to Co-operate Meeting with Hammersmith and Fulham
27/06/2024

Attendees:

- Richard Crutchley (RC) – Wandsworth
- Amy Ingle (AI) – Wandsworth
- Bebert Longi (BL) – Wandsworth
- Sarah Dixey (SD) - London Borough of Hammersmith and Fulham (LBHF)
- David Gawthorpe (DG) - London Borough of Hammersmith and Fulham

Discussions:

Updates on Wandsworth Local Plan Partial Review

- RC set out the purpose of the meeting to update LBHF on the progress of the Wandsworth Local Plan Partial Review. Wandsworth has consulted with neighbouring boroughs and other statutory bodies since the last meeting with LBHF in January.
- ORS has been commissioned for the Housing Needs Assessment and BNP Paribas for the Whole Plan Viability Assessment.
- A first draft of the LHNA has been received; an early review of the findings supports policy ambitions; however, data interpretation is ongoing.
- RC highlighted that WBC are keen on reviewing student accommodation policy, which will be part of the Housing Needs Assessment, but this is unlikely to have an impact on the partial review.
- SD mentioned Gradpads with Imperial College at Wintanley, highlighting strategic nature of student housing.
- DG stated that LBHF is also working on student accommodation policy and have commissioned Aecom to conduct a study on the growing number of student accommodation schemes across the borough, ideally feeding recommendations to a student housing approach in an SPD.
- RC raised the issue of an unequal distribution of student housing across London with some boroughs being more resistant to them than others. Key issues include minimising the need for travel and having a focus on purpose-built student accommodation being linked with a local HEP. Developers argue that this link is not guaranteed at planning application stage as it is dependent on planning consent.
- SD questioned whether Wandsworth has investigated student accommodation being converted to short-term lets or Airbnb providers during out of term periods and service departments. RC responded that this has not currently been looked at but is a reoccurring point; it may be something that becomes a factor in Wandsworth's research.
- AI shared some findings from her student housing policy research on other London boroughs:
 - LB Camden is seeking to define its own student accommodation target.
 - LB Croydon's policy states PBSA should not exceed 5% of total housing growth.
 - LB Islington's policy prioritises HEPs in close proximity.

- LB Lambeth requires PBSA to be delivered as part of a mixed-use development.
- DG raised the issue of an increased number of hotel applications in the borough, particularly new pod hotel applications on mixed use schemes. A separate study is being conducted on this.
- RC mentioned a recent application for a pod hotel in Putney, remarking that changes in policy, including permitted development and different forms of accommodation, were making assessment of schemes more complex.
- SD mentioned meeting with a Policy Officer at Lewisham Council regarding a policy covering all eventualities within upcoming planning applications and potential changes in the type of housing.

Updates from LBHF

- LBHF paused local plan preparation anticipating new secondary legislation in Autumn, which might change with a potential new government following the general election.
- DG mentioned that LBHF is continuing with evidence gathering for student accommodation and hotel studies and are also commissioning an Employment Land Study on Earl's Court. A timetable will be published soon.
- LBHF plans to contact Wandsworth for Duty to Cooperate meetings next year.
- Members at LBHF are keen to progress with the plan, focusing on areas such as climate change and possibly the 70:30 affordable housing splits, pending GLA and London Plan perspectives.
- RC noted Wandsworth's radar includes this, especially with the London Plan Review expected in coming months
- Wandsworth is also working on the Clapham Junction Masterplan.

AOB

- SD asked about IDP and potential knock-on effects on affordable housing and the partial review.
- RC stated this has been revisited in respect of infrastructure spending in Nine Elms.
- DG asked about SoCG and RC responded that there may be a SoCG but this is unlikely before Reg 19.

Wandsworth Local Plan Partial Review

Duty to Co-operate Meeting with London Borough of Hammersmith and Fulham (LBHF)

16th January 2025 @ 15:00

Attendees:

- Daniel Goodman (DGo) - Wandsworth
- Amy Ingle (AI) – Wandsworth
- Bebert Longi (BL) – Wandsworth
- David Gawthorpe (DGa) – Hammersmith and Fulham
- Sarah Dixey (SD) – Hammersmith and Fulham

Discussions

Introductions

- Attendees introduced themselves and their role.

Update on Wandsworth Local Plan Partial Review

- DGo provided an update on the partial review and recapped the main ambitions of the review:
 - Wandsworth Local Plan adopted in July 2023; partial review initiated in 2023
 - Proposes 50% affordable housing requirement, with a local fast track route, and tenure split of 70% for social rent and 30% intermediate split.
 - Also proposes to introduce an affordable housing contribution for smaller sites (<10 units) to contribute to affordable housing.
- DGo noted that the Regulation 19 consultation was launched this week and was closing after 6 weeks on Monday 24th February.
- DGo presented the main amendments to each of the six policies included in the partial review:
 - Policy LP23 Affordable Housing - the threshold is increased to 45% for fast-track applications, small sites to make financial contributions to affordable housing of £50,000 per dwelling
 - Policy LP24 Housing Mix has been updated to shift a preference towards family-sized homes; fewer one-bedroom units.
 - Policy LP28 updates Student Accommodation to require developers contribute financially to conventional affordable housing.
 - Policy LP29 and LP30 Shared Living/HMOs & Build-to-Rent updated to align with local thresholds and clarify contributions.
 - Policy LP31 Housing for Vulnerable People and Older People updated to align with the Local Plan rather than London Plan requires for Affordable Housing.
- DGa asked what viability scenarios were tested for small sites, and how Wandsworth got the £50k figure for contributions on small sites
 - DGo noted that BNP Paribas were commissioned to do the viability testing for the partial review and that all the scenarios are in this document which is

available online as part of the consultation currently underway. DGo also stated that some development in the borough will easily be able to make the £50k contribution but some won't – developers able to submit viability evidence where this is not the case.

- SD asked if Wandsworth have tested policy viability on council-owned sites and if Wandsworth have looked at what we can potentially deliver on own sites.
 - DGo noted that most of the viability evidence looks at private sites and that Wandsworth already has a separate regeneration programme underway.
- DGa asked if Wandsworth have a criteria for how developers are expected to justify that land is unsuitable for conventional development.
 - DGo noted that allocated sites were considered unsuitable where these have been allocated for residential uses. These are the sites that the Council wants to avoid being developed for PBSA due to the need to safeguard the supply of conventional housing
- SD noted that there are examples of PBSA being built above industrial and commercial uses.
- SD asked how discussions with the GLA have gone with regards to the proposals Wandsworth are making and if the current state of flux with the new London Plan has had any impact on the proposals.
 - DGo noted that discussions with the GLA have been focussed on conformity with the London Plan.
- DGa requested a copy of the presentation – AI to share this with minutes.

Hammersmith and Fulham Updates

- DGa stated that Hammersmith and Fulham are hoping to adopt a new plan in 2027, and that they will be in contact regarding their own Duty to Cooperate in the near future. DGa noted that they have similar ambitions to Wandsworth.
- DGa noted that some of their allocations are safeguarded wharves, and that they are currently gathering evidence. DGa mentioned they will be producing a Riverfront SPD.

AOB

- DGo provided an update on the Clapham Junction Masterplan which has now progressed to Stage 2.
- DGo encouraged Hammersmith and Fulham to make representations to the partial review proposals if they wish.