



Wandsworth Local Plan Partial Review

Statement of Common Ground between:

- (i) London Borough of Wandsworth and
- (ii) Natural England

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 Natural England 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. The Council engages regularly with prescribed bodies, including Natural England, to discuss strategic and cross-boundary issues.
- 1.3. This SoCG records the outcomes of engagement between Natural England 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 Natural England. 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;"

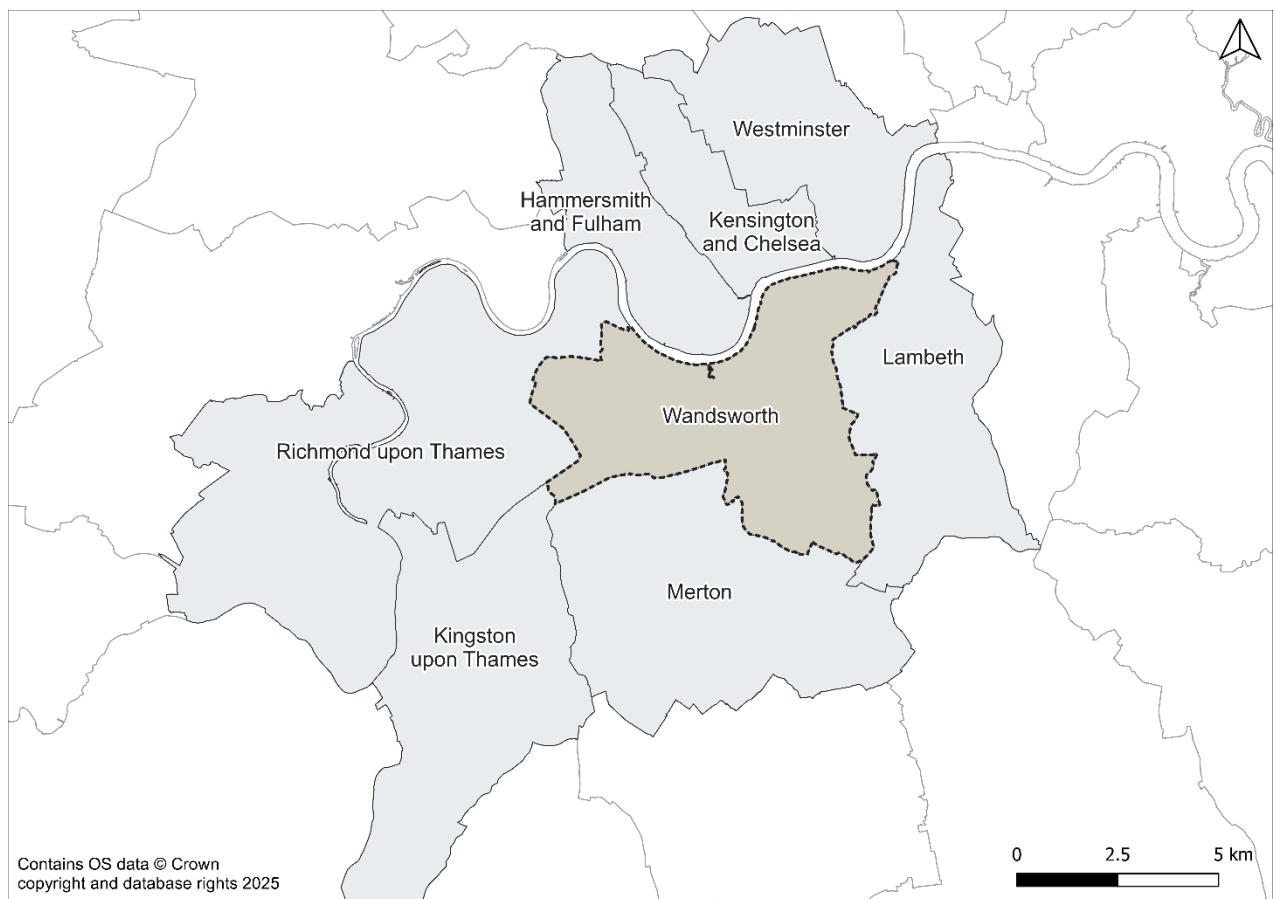
- sustainable development or use of land in a two-tier area if the development or use – is a county matter or has or would have a significant impact on a county matter.”
- 2.2. The National Planning Policy Framework (NPPF) (2024) (Paras 20-24) sets out the requirements and guidance that the Local Plan 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. 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.
- 3.3. 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.
- 3.4. 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.



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 aim 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 conventional 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 Natural England 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 cooperate 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
 - iv. The parties which are signatories to this Statement consider that the regulatory assessments, including the Habitat Regulations Assessment, have been undertaken appropriately in accordance with legislation and guidance

7. Evidence and Outcomes of Co-operation

- 7.1. A list of meetings held between the Council and Natural England in relation to the Wandsworth Local Plan Partial Review are below:
- 6th June 2024
 - 24th October 2024
- 7.2. A copy of Natural England's response to consultations in the Wandsworth Local Plan Partial Review is provided at Appendix A.
- 7.3. Specific outcomes of co-operation between the parties are:
- On 21st October 2024, Natural England provided feedback on a draft of the Regulation 19 HRA Screening Report prepared by the Council. Feedback included comments on the methodology section, the 'types of impact' section and air quality section.
 - On 24th October 2024, LBW met with Natural England to discuss the Regulation 19 HRA and the feedback given on the initial draft. Natural England gave advice which meant that the Local Plan Partial Review could largely rely on the findings of the 2022 HRA undertaken for the adopted Local Plan (2023).
 - On 12th February 2025, Natural England responded to the Council's Regulation 19 consultation confirming it had no comments to make.

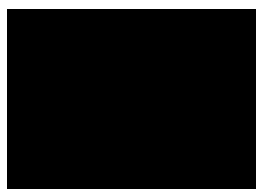
8. Governance Arrangements

- 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.

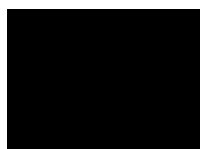
10. Signatures



Name: Adam Hutchings

Date: 28/05/2025

On behalf of the London Borough of Wandsworth



Name: Bella Jack, Manager

Date: 16/05/2025

On behalf of Natural England

Wandsworth and Natural England Duty to Co-operate Meeting Notes

06th June 2024 – 13:30

Attendees:

- Richard Crutchley (RC)– Wandsworth
- Amy Ingle (AI) – Wandsworth
- Bebert Longi (BL)
- Benjamin Leigh (BL) – Natural England
- Bella Jack (BJ) – Natural England

Discussion:

Update on Wandsworth Local Plan Partial Review

- RC: Wandsworth adopted the Local Plan in July 2023 with the Partial Review commencing shortly after
- RC: The review seeks;
 - 50% affordable housing contribution from developments
 - To change the tenure split to 70:30 in favour of social rent
 - Affordable housing contributions from small sites (<10 dwellings)
- RC: Reg.18 statement was accompanied by HRA, Sustainability Appraisal but not policy wording or evidence. We are now collecting the evidence and producing wording.
- RC: Affordable Housing features throughout the plan, so we will be looking at wording throughout the plan and evaluating the implications of any changes to the affordable housing policy.
- BJ: On previous consultations, Natural England main concerns had been on the HRA.
- RC: Expect that any impacts arising from the work we are doing will not impact NE concerns.
- BJ: The previous HRA (NE didn't pick this up at the time) only goes to the screening stage BUT there is some mention of mitigation in the screening stage. Any sort of mitigation needs to come at appropriate assessment stage. Thinks that if we do this again for the Partial Review, LBW could tighten up this wording. Natural England get a lot of correspondence regarding protected sites and encourage us to have as robust wording as possible.
- BJ: Natural England are trying to make their guidance as close to the regulations as possible; would be good if our HNA could do the same.
- BJ to put this information into an email.

Other Relevant Work

- RC: Another major piece of work is the Clapham Junction master plan. This includes the surrounding walkways and pathways, particularly toward the river, and the contribution of these to open space. Engagement will follow later this year.

- BJ: NE are tight on resource and are being more reactive than proactive at the moment.. Focus on protected sites and Epping Forest, but ideally would like to be more involved in wider London work;
 - Clapham Junction sounds like an excellent opportunity for nature recovery and corridors
 - National Trust also doing some work along River Wandle
 - RC: Our part of the Wandle is quite industrialised, we have a missing link along the pathway, esp. near Merton .
 - RC: There is development pressure to change some of these uses and move away from industrial. We would like to improve the quality of this open space corridor
 - BJ: This sort of connectivity work is a huge opportunity in London for nature recovery – London is a green city but the green spaces are not very well linked. NE want to support councils in implementing green infrastructure and strengthening links between green spaces
- BJ: Once we get further down the line with CJ, they have colleagues in green infrastructure who should be able to advise.
- RC: In terms of open space and recreation, Enable lead on work in Wandsworth.

11th June 2024 Email from Bella Jack:

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.

Wandsworth and Natural England Duty to Co-operate Meeting Notes

24th October 2024 – 11:00

Attendees:

- Amy Ingle (AI) – Wandsworth
- Daniel Goodman (DG) - Wandsworth
- Bella Jack (BJ) – Natural England

Discussion:

Wandsworth Borough Council (WBC) met with Natural England to discuss feedback provided on the first draft of the Habitats Regulations Assessment Screening Report.

BJ: Noted that WBC should make clearer in the HRA that the policy proposals will not result in an increase in housing from the adopted local plan. BJ noted that WBC could rely on the findings of the HRA in the 2023 adopted plan in this case, because the main effects to habitats would come from site allocations and housing figures rather than the types of policies we are reviewing.

BJ: Noted that the methodology makes sense and is laid out clearly.

BJ: Recommended that WBC rearrange the 'types of impact' section so the headings are the different policies rather than the types of impacts such as recreational causes, urbanisation and atmospheric pollution.

BJ: Noted that Natural England are now asking Local Authorities to also consider the impact of increases in traffic on ammonia emissions, but due to the limited review of the local plan this is not essential in this HRA.

BJ: Noted that Natural England would work with the GLA when the London Plan review begins on air quality issues as some points are no longer relevant, but NE recognises this is a strategic issue that needs to be addressed through the review.

DG: The partial review is going to committee in November. We are making the HRA available to members on request, and will be getting a final version ready for November which will allow time to finalise everything for the January Regulation 19 consultation.