



Wandsworth Local Plan Partial Review

Statement of Common Ground between:

- (i) London Borough of Wandsworth and
- (ii) City of Westminster

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 City of Westminster 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 City of Westminster 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 City of Westminster 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 City of Westminster. 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;"

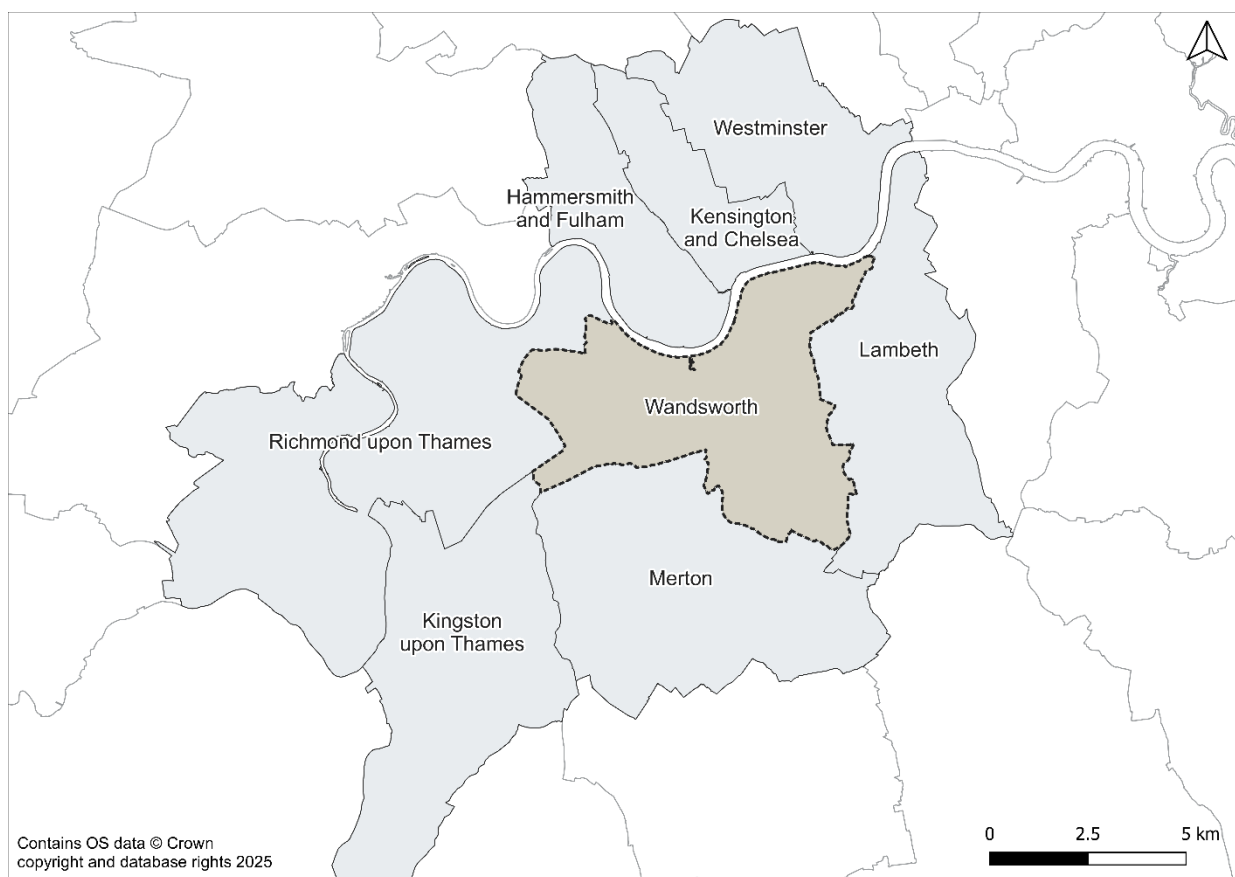
- sustainable development or use of land in a two-tier area if the development or use – is a county matter or has or would have a significant impact on a county matter.”
- 2.2. The National Planning Policy Framework (NPPF) (2024) (Paras 20-24) sets out the requirements and guidance that the Local Plan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

7. Evidence and Outcomes of Co-operation

- 7.1. A list of meetings held between the Council and the City of Westminster in relation to the Wandsworth Local Plan Partial Review are below:
- 13th February 2024
 - 12th June 2024
 - 24th January 2025
- 7.2. Specific outcomes of co-operation between the parties are:
- LB Wandsworth and City of Westminster shared information about the ongoing work on the Local Development Plans of the respective boroughs.

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

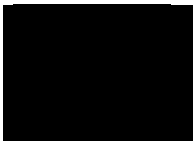
- 9.1. The parties note the Council's current Local Development Scheme timetable for the Wandsworth Local Plan Partial Review.
- 9.2. The parties expect the SoCG to expire six months from adoption of the Wandsworth Local Plan Partial Review and/or the superseding of this document by a new SoCG agreed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

10. Signatures

Name: Adam Hutchings

Date: 28/05/2025

On behalf of the London Borough of Wandsworth

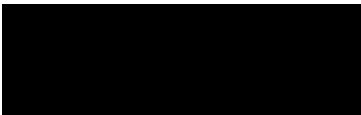


Name: Debbie Jackson

Date: 07/05/2025

Executive Director for Regeneration, Economy & Planning (REP)

On behalf of the City of Westminster



Wandsworth and Westminster

Duty to Co-operate Meeting Notes

13.02.2024

Attendees:

- Daniel Goodman (DG) – Wandsworth (WBC)
- Sarah Little (SL) – Westminster (WCC)
- Sean Walsh (SW) – Westminster

Discussions

Introductions

- DG introduced himself as a new Principal Planner in the team at Wandsworth, primarily supporting the Wandsworth Local Plan Partial Review
- DG introduced the purpose of the meeting – to update WCC on the Wandsworth Local Plan Partial Review

Update on Wandsworth Local Plan Partial Review

- DG 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.
- DG 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.
- DG summarised the GLA response to the Reg 18 consultation – potential risk of non-conformity raised but 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.

Update on Westminster City Plan Partial Review

- SL advised of a similar picture in Westminster. WCC are undertaking a partial review of their City Plan, focussed on three main elements – review of affordable housing policy (focused on tenure split and small sites); four new allocations (trickier sites reliant on policy) and changes to sustainability requirements (including requiring Whole Life Carbon Assessments and new retro-fit first and embodied carbon approach)
- WCC had previously held a round of DTC meetings in Autumn 2024
- Updates on WCC evidence:
 - HNA is now completed, undertaken by ORS. Happy in the end but required some iteration with the consultant. Headline results include a huge AH need, something like 85% of housing would need to be affordable of which 70% would need to be social rent
 - WPVA is now approaching completion following multiple drafts, undertaken by BNP Paribas. Focused on assessing cumulative impacts and, as Wandsworth, trying to get nuances right
- 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.
- Discussion on inclusion or non-inclusion of First Homes in policy – DG advised that First Homes references had been removed from adopted policy as evidence suggested they were not an appropriate / effective product for affordability reasons.
- 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

AOB

- No active discussions regarding Nine Elms Pimlico Bridge
- Historic discussions around a proposed allocation in Westminster (Grosvenor Sidings)- may need a discussion at Reg 19 stage
- SoCG to be shared during Reg 19.
- Agreed to liaise again as required as both plans progress

Wandsworth and Westminster Duty to Co-operate Meeting Notes

12th June 2024

Attendees:

- Richard Crutchley (RC) – Wandsworth
- Amy Ingle (AI) – Wandsworth
- Bebert Longi (BL) – Wandsworth
- Sean Walsh (SW) – Westminster
- Sarah Little (SL) – Westminster

Discussions

Update on Wandsworth Local Plan Partial Review

- RC noted that Wandsworth has started its second round of DtC meetings and is currently progressing with gathering Reg 19 evidence for the Local Plan Review.
- Wandsworth has commissioned ORS for the Housing Needs Assessment (HNA) and BNP Paribas for the Whole Plan Viability Assessment (WPVA). Work is ongoing to interpret the data and understand key changes from previous assessments.
- RC highlighted that the last engagement between Wandsworth and Westminster was for the Statement of Common Ground on the Westminster City Plan partial review concerning affordable housing, retrofit and site allocations. AI would ensure that the latest signed version is with Westminster colleagues.
- Wandsworth are reviewing the wording of the policies subject to the review, and assessing if changes are necessary on other sections of the local plan such as the housing policy mix.

Update on Westminster

- SW explained that Westminster is progressing with its partial local plan review on retrofitting, affordable housing and site allocations. They completed the Regulation 19 stage on 9th May and are currently reviewing comments.
- SW stated that the most significant opposition had come from the industry in respect of the retrofit-first policy.
- SW suggested that changes to affordable housing have been less contentious, but policy changes on small sites have still faced pushback, particularly from small developers.
- RC discussed engagement, with Wandsworth keen to hear from those affected by proposed affordable housing policy changes. This broad group is less likely to engage with planning particularly as the effects of the policy are not immediately apparent in the short term.
- SW shared Westminster's topic paper on small sites which aimed to explain and justify their reasons for the policy.
- RC asked about the way in which changes to the policy were presented at Regulation 19 to ensure clarity (e.g. removing sections of policy or making tracked changes), and the

knock-on effects on the whole city plan. SW explained it is presented as a new policy combined with minor updates as tracked changes but retains much of the old text.

- SL highlighted that approximately 100 people responded to the Regulation 19 consultation. TfL had opposed the portfolio approach to affordable housing, referencing Islington's policy being stripped out by the inspector during the examination.

General Update on Wandsworth

- RC updated on the Clapham Junction masterplan which has focused on station capacity and circulation but will move to development opportunities shortly. This work is expected to continue for the next 12 months and is unlikely to affect Westminster.
- RC noted that Clapham Junction is seen as a nascent Opportunity Area in the London Plan. The GLA estimates 2,500 jobs and 2,500 homes could be delivered in this area.
- SW asked if there would be any impact of potential on views and townscape and RC responded that it is unlikely, but uncertain.

AOB

- Pimlico Bridge remains an aspiration, but there has been no progression since the last DtC meeting.
- Grosvenor Sidings is an allocation in Westminster's review. RC queried the future of the sidings and Network Rail's intentions for them, particularly in relation to the future of Clapham junction sidings. Officers didn't know if there was any relationship between the two sites. RC would raise this with Network Rail.

Wandsworth and Westminster
Duty to Co-operate Meeting Notes
24.01.2025

Attendees:

- Amy Ingle (AI) – Wandsworth
- Bebert Longi (BL) – Wandsworth
- Marina Molla Bolta (MMB) - Westminster
- Sean Walsh (SW) - Westminster

Discussions

Introductions

- AI provided a background on the purpose of the meeting and the consultation launch for the partial review of the Local Plan.
- AI provided an update on the Local Plan Partial Review and recapped the main ambitions of the review:
 - Wandsworth Local Plan adopted in July 2023; partial review shortly after.
 - Proposes 50% affordable housing target, with 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.
- AI noted that the Regulation 19 consultation on the Partial Review was launched this week and was closing after 6 weeks on Monday 24th February.
- AI 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.
- SW gave an update on Westminster Partial Review – a recap of proposed policies on affordable housing, retrofit, and site allocations, and explained the Plan was now under examination and that preliminary questions from the Inspector had been largely procedural

Clapham Junction Master Plan

- AI gave updates on the progress of Stage 2 of the Clapham Junction Master Plan.
- Collaborating with stakeholders to improve station access and surrounding development.
- SPD consultation planned for late 2025.
- Public consultation will continue until February 2025.

AOB