



Wandsworth Local Plan Partial Review

Statement of Common Ground between:

- (i) London Borough of Wandsworth and
- (ii) Royal Borough of Kensington and Chelsea

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 Royal Borough of Kensington and Chelsea 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 Royal Borough of Kensington and Chelsea 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 Royal Borough of Kensington and Chelsea 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 Royal Borough of Kensington and Chelsea. 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).

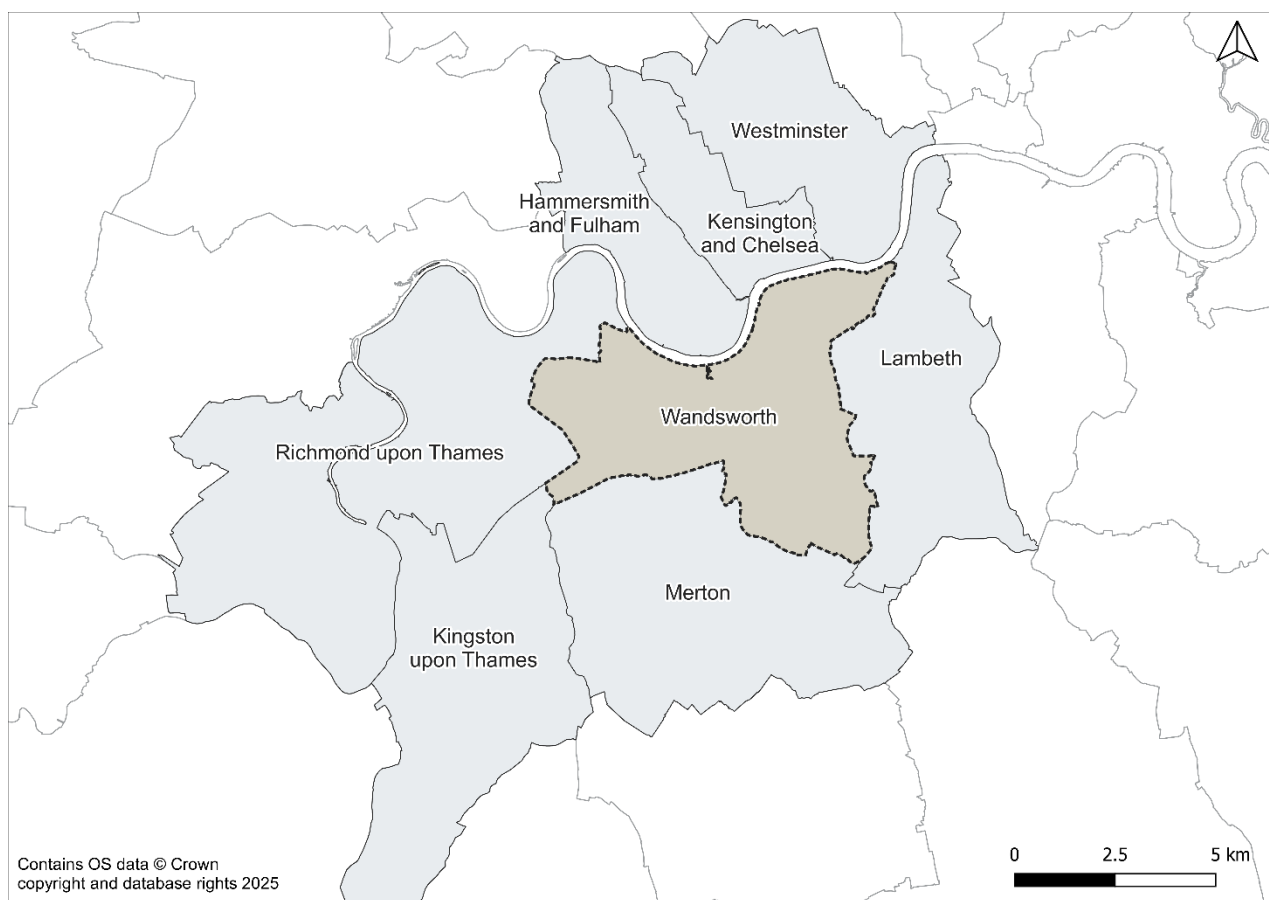
2.4. Planning Inspectors are required to test legal compliance with the Duty to Cooperate legislation and all other legal requirements alongside the wider tests of the Plan’s ‘soundness’.

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 Royal Borough of Kensington and Chelsea 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 Royal Borough of Kensington and Chelsea 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 Royal Borough of Kensington and Chelsea in relation to the Wandsworth Local Plan Partial Review are below:
- 18th January 2024
 - 11th June 2024
 - 14th January 2025
- 7.2. Specific outcomes of co-operation between the parties are:
- LB Wandsworth and RB Kensington and Chelsea shared information about the ongoing work on the Local Development Plans of the respective boroughs.

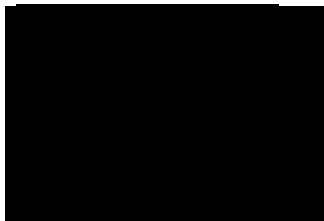
8. Governance Arrangements

- 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: Preeti Gulati Tyagi, Planning Policy Team Leader

Date: 25/04/2025

On behalf of the Royal Borough of Kensington and Chelsea

Wandsworth Local Plan Partial Review

Duty to Co-operate Meeting with Royal Borough of Kensington and Chelsea (RBKC)

18.01.2024

Attendees:

Richard Crutchley (RC) - Wandsworth

Daniel Goodman (DG) - Wandsworth

Preeti Gulati Tyagi (PGT) – Kensington and Chelsea

Introductions

- DG introduced himself as a new Principal Planner within the Spatial Planning team at Richmond and Wandsworth Councils. Advised that he would primarily be working on the Wandsworth Partial Review but likely to also help on wider projects as required.
- RC advised of some changes within the team since the previous formal meeting between the authorities. Adam Hutchings now occupies a Team Manager role for Spatial Planning and Design, replacing Andrea Kitzberger-Smith who has joined Hounslow.
- RC spoke to the structure of the team as part of the Shared Staffing Arrangement between Richmond and Wandsworth Councils, including the sharing of Senior Planners and Planners between the two authorities based on operational needs.
- RC advised that the Richmond Local Plan was due to be submitted this week

Wandsworth Updates

Local Plan Partial Review

- Wandsworth are undertaking a Partial Review of their Local Plan.
- The scope of the review is expected to be fairly limited with a limited impact on other Boroughs, but nevertheless it is felt important to touch base
- Wandsworth adopted their Local Plan in July 2023
- RC gave a background to challenges within the examination of the Wandsworth Local Plan. Shortly after adoption, Wandsworth chose to commence an immediate review focussed around affordable housing
- This immediate review is taking the form of a Partial Review focussed on Policy LP23
- Following adoption, Wandsworth undertook a Regulation 18 consultation (Oct – Dec 2023) which sought feedback on three main statements
 - i. To seek a 50% affordable housing contribution from developments¹
 - ii. To change the tenure split to 70:30 in favour of social rent
 - iii. To start requiring affordable housing contributions from small sites (<10 dwellings)
- Wandsworth are yet to develop a revised draft policy or an evidence base
- RC summarised responses to the Reg 18 consultation–

¹ Which may include a need to disapply the Mayor's Threshold Approach

- Around 250 responses
- Responses largely as expected
- Significant opposition from development industry including a lobby of small builders against the small sites requirement specifically
- Many small builders active in the area / sub-region used a templated response which referenced common concerns and cited issues with the approach to small sites in Lambeth and Southwark
- Most concerns raised cited impacts on viability, deliverability and the need for evidence.
- RC advised that Wandsworth's objectives with the review are focussed on affordable housing and that it does not plan to broaden the review to take into account wider issues
- However, RC acknowledged that it is possible that other parts of the plan may need to be adapted to conform with outcomes of the review
- DG advised that Wandsworth recognise the need for evidence to support the review, and intend to procure Local Housing Needs Assessments and Whole Plan Viability Assessments shortly with a view to these incepting in March 2024. Briefs are being written and possible consultants identified
- Wandsworth have also set up bespoke Steering and Working groups which will begin meeting from the end of January to drive the review forward. These groups comprise both Members and Officers.
- Wandsworth's ambition is to develop the updated policy over the summer with a view to undertaking a Regulation 19 consultation in Autumn 2024. Wandsworth are conscious of the need to submit the plan before June 2025.

Other Matters

- Wandsworth have just procured Weston Williamson to develop a masterplan for Clapham Junction
- Expected to move quickly, particularly around issues on station capacity
- Expected to continue for the remainder of the year with a view to creating a SPD

RBKC Updates

- PGT advised that RBKC Local Plan is still at EiP but they have been advised that it has no significant issues
- EiP is moving slower than anticipated – submitted Feb 23, hearings in June 23
- Whilst advised that their plan is capable of being found sound, RBKC received quite a long list of modifications / action points which required work with the Inspector to understand
- RBKC are now confident that they understand Inspector's instructions
- Main Modifications sent to IIA consultants and RBKC expect to start consultation on 30th Jan and close on 12 March.
- Adoption expected for May / June 2024.
- The RBKC Local Plan's affordable housing policy sets out a 70:30 split in favour of social rent with a threshold of 650m2 – whilst not aligned to NPPF, this approach did not receive extensive objections including by the Inspector
- Plan has a stepped trajectory which should improve delivery performance
- RBKC have sought to increase the energy requirement in the plan, Wandsworth were also part of the same work – although this was led by Catriona who is now on maternity leave

- Hearing sessions generally not contentious, some greater contention on the tall buildings sessions
- Inspector added in a requirement to align affordable housing with habitable rooms, but also retain RBKC's preferred floorspace approach, meaning both requirements apply

AOB

- RC acknowledged that previous meeting included a discussion around procuring consultation software – PGT advised that RBKC had opted to stay with same provider
- RC advised that Wandsworth use the provider Objective, which has recently added some new features which will be tested at Regulation 19 stage
- RBKC looking at borough-wide design code which RC requested to be kept up to date on to inform possible Wandsworth approach which is currently less advanced
- RBKC are also looking at producing a range of guides for residents including on how to retrofit and achieve other sustainability improvements
- Both authorities are also looking at updating their Planning Obligations and Affordable Housing SPDs as part of their respective plan reviews

Actions

- No formal actions required, both authorities will continue to liaise as appropriate
- Authorities will consider the need for a formal Statement of Common Ground at a later date

Wandsworth and Royal Borough of Kensington and Chelsea

Duty to Co-operate Meeting Notes

11th June 2024

Attendees:

- Amy Ingle (AI) – Wandsworth
- Bebert Longi (BL) – Wandsworth
- Preeti Tyagi Gulati (PGT) – Royal Borough of Kensington and Chelsea

Discussions

Introductions

- AI and BL introduced themselves as Senior Policy Planner and Planning Apprentice at Wandsworth Council, respectively.
- PGT introduced herself as Planning Policy Team Leader at the Royal Borough of Kensington and Chelsea Council (RBKC).

Update on Wandsworth Local Plan Partial Review

- AI provided background on the partial review of the local plan and updates since the previous Duty to Cooperate (DtC) meeting with RBKC.
- AI reported on the consultation on the proposals to seek a 50% affordable housing contribution for developments and tenure split to 70:30 in favour of social rent, noting opposition from small builders.
- AI noted that BNP Paribas have been commissioned to undertake the whole plan viability assessment, and ONS have been commissioned to undertake the Housing Needs Assessment.
- AI noted the consultation undertaken to date including the Reg18, and the additional consultation undertaken with small developers, using the assumptions from the whole plan viability assessment.
- AI updated on the next steps for WBC, including policy drafting, review of examples of best practice and scoping implications of policy change on wider areas of the adopted plan.
- PGT raised that their policy which did not support student accommodation policy was questioned by the inspector. PGT noted that it appeared that further evidence was required to support this stance as the evidence was mainly based on a statement from Imperial College stating that there was no additional need for student accommodation within the borough.
- The inspector suggested more evidence was needed and recommended changing the policy wording to be more positive.

- Additionally, PGT also mentioned that the inspector questioned their small sites approach and recommended that it was changed from a unit-based approach to an area approach of 650sqm or less.
- Regarding the Wandsworth Local Plan Partial Review PGT stated that RBKC has no additional comments since the last meeting in January.

Other updates on Wandsworth

- AI updated on the Clapham Junction Masterplan work with the appointment of Weston Williamson and Partners (WW+P) and the ongoing engagement between Network Rail, TfL and the GLA on improving platform capacity, improving connectivity to the town centre and riverside and looking at opportunities for contributions to open space.
- AI shared progress update on design coding work that Daniel Goodman has been working on.

Updates on Royal Borough of Kensington and Chelsea

- PGT mentioned that RBKC is currently awaiting the inspector's report following examination of their local plan review last year which expected to be published in July after the general elections.
- AI inquired about updates from the last meeting with RBKC on the implementation of a borough-wide design code. PGT confirmed the introduction of a sweep of SPDs.
- PGT noted the need to update the RBKC planning contributions SPD on the back of their local plan review.
- PGT also mentioned that they are currently updating their domestic retrofit and sustainability guide and an updated version is expected following the general election.

Wandsworth Local Plan Partial Review

Duty to Co-operate Meeting with Royal Borough of Kensington and Chelsea (RBKC)

14.01.2025

Attendees:

- Daniel Goodman (DG) – Wandsworth
- Amy Ingle (AI) – Wandsworth
- Bebert Longi (BL) – Wandsworth
- Preeti Gulati Tyagi (PGT) – Royal Borough of Kensington and Chelsea

Discussions

Introductions

- DG provided a background on the purpose of the meeting and the consultation launch for the partial review of the Local Plan.
- DG raised that the Wandsworth has launched the Local Plan Partial Review (LPPR) Regulation 19 consultation this week.

Partial Review of Local Plan (LPPR)

- 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 shortly after
 - Proposes 50% affordable housing requirement, 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.
- DGo noted that the partial review 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 6 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.
- PGT raised questions on how the proposed 45% threshold interacts with the GLA's fast-track policy and whether the small site policy apply to net additional homes or gross from redevelopment. DG responded that general conformity will depend on consultation feedback from the GLA but that the Council saw the local fast track route as complementary to the overall London Plan approach. DG also clarified that the small

sites policy applies to gross, but adjustments could be considered if consultation feedback indicates otherwise.

- The LPPR is unlikely to influence RBKC policies, but it is useful to understand Wandsworth approach.

Clapham Junction Master Plan

- DG 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