



Wandsworth Local Plan Partial Review

Statement of Common Ground between:

- (i) London Borough of Wandsworth and
- (ii) London Borough of Lambeth

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 Lambeth 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 Lambeth 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 Lambeth 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 Lambeth. 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).

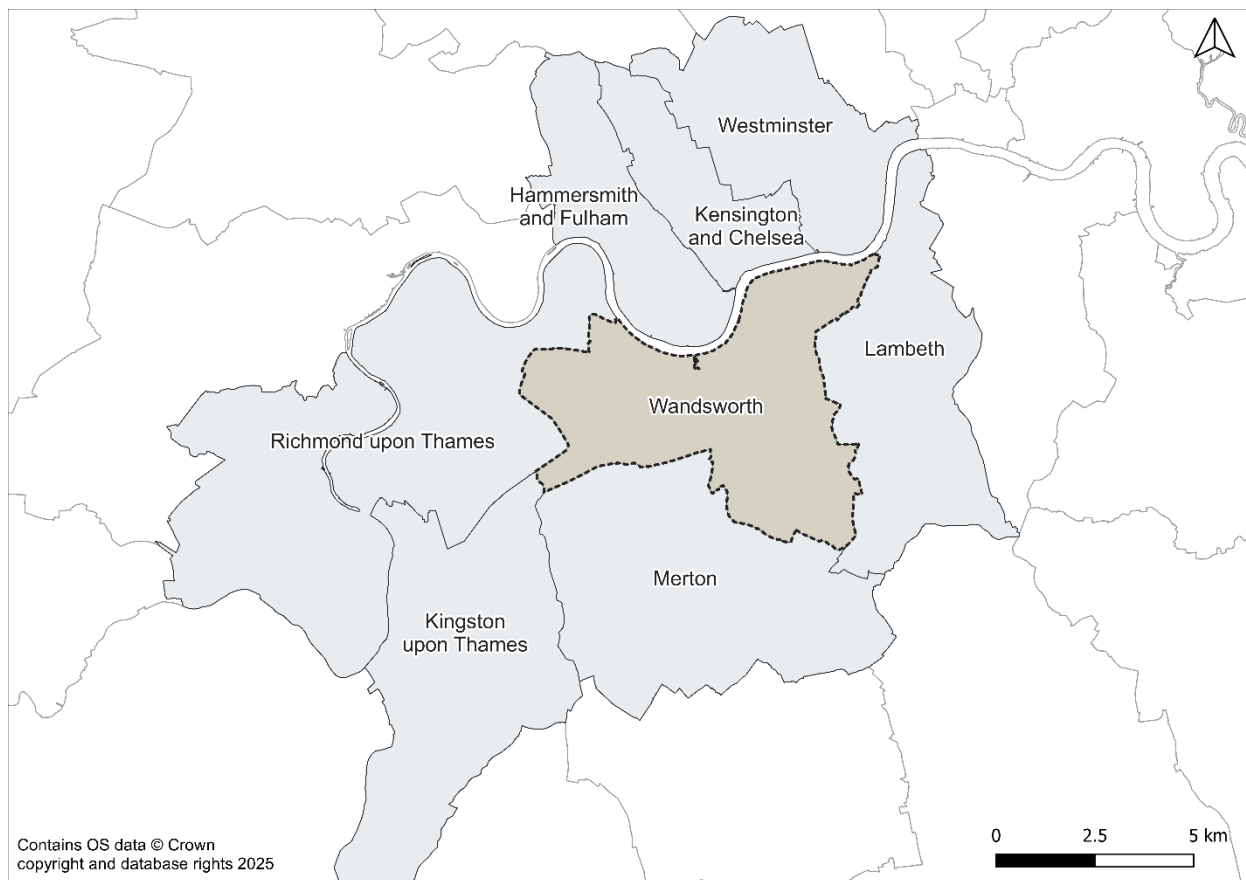
2.4. Planning Inspectors are required to test legal compliance with the Duty to Cooperate legislation and all other legal requirements alongside the wider tests of the Plan’s ‘soundness’.

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 London Borough of Lambeth is located to the east of Wandsworth.



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 London Borough of Lambeth 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 London Borough of Lambeth in relation to the Wandsworth Local Plan Partial Review are below:
- 20th February 2024
 - 6th June 2024
 - 16th January 2025
- 7.2. A copy of the London Borough of Lambeth's response to consultations in the Wandsworth Local Plan Partial Review is provided at Appendix A.
- 7.2. Specific outcomes of co-operation between the parties are:
- LB Wandsworth and LB Lambeth shared information about the ongoing work on the Local Development Plans of the respective boroughs.
 - LB Lambeth expressed support for LB Wandsworth's efforts to increase the delivery of affordable housing through the LPPR.

8. Governance Arrangements

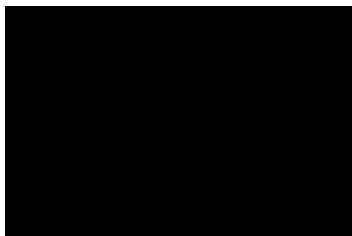
- 8.1. The parties are responsible for reviewing and signing this SoCG in line with their own governance arrangements.

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.

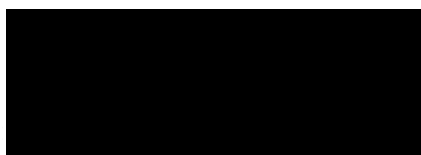
10. Signatures



Name: Adam Hutchings

Date: 28/05/2025

On behalf of the London Borough of Wandsworth



Name

Date: 02/05/2025

On behalf of the London Borough of Lambeth

Appendix A: Copy of Formal Consultation Responses

The London Borough of Lambeth welcomes the opportunity to respond to the Wandsworth Local Plan Partial Review. The two boroughs have worked closely together in recent years to discuss common strategic matters and prepare Statements of Common Ground, in line with the Duty to Cooperate, and are jointly committed to delivering more affordable housing in the Vauxhall, Nine Elms and Battersea Opportunity Area. We look forward to continuing this good working relationship as the Wandsworth Local Plan progresses and as we begin to review our own Lambeth Local Plan. We support the aims of the revised policies in the consultation draft to better reflect identified housing need in the borough, and to increase affordable housing delivery on suitable sites throughout Wandsworth. We have no specific comments or changes to make on individual policies, and we do not think that the revised policies raise any strategic issues between the two boroughs.

Wandsworth Local Plan Partial Review

Duty to Co-operate Meeting with Lambeth

20.02.2024

Attendees:

- Daniel Goodman (DG) – Wandsworth
- Richard Crutchley (RC) – Wandsworth
- Laura Bourke (LB) – Lambeth
- Thomas Davies (TD) – Lambeth

Discussion:

Introductions

- RC gave a staffing update:
 - Adam Hutchings promoted into a manager role
 - RC promoted to Principal Planner filling Adam's vacancy
 - DG has recently been appointed into a new Principal Planner role
- DG, LB and TD introduced themselves

Wandsworth Updates

- RC introduced the purpose of the meeting as to update LB Merton on the Wandsworth Local Plan Partial Review, part of a series of early meetings being undertaken with neighbouring authorities and the GLA
- 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 around 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)
- 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%

- Wandsworth are out to procurement on two key evidence base studies (Housing Needs Assessment and Whole Plan Viability Assessment) – responses due back in early March
- Discussion on First Homes – current WBC policy does not provide for First Homes as they are seen as an inappropriate / ineffective product in the context of affordability. This will be revisited in the evidence but expectation is it will remain an inappropriate product in the context of affordability
- Wandsworth are looking to scope any other areas of the plan to review – did not receive any requests to expand scope at Reg 18 stage
- WBC are not foreseeing any cross-boundary issues with the single issue review
- WBC are looking to explore the Islington precedent, who have a Local Plan policy which has increased the threshold to 45% (compared to the 35% London Plan requirement)
- WBC have met with the GLA who showed a willingness for flexibility on the threshold approach as long as evidence demonstrates any flexibility would not harm affordable housing supply
- WBC are exploring the need to update their SPDs but this is not currently being prioritised or progressed
- WBC also engaged on a Clapham Junction masterplan – early stages, light touch engagement, consultants engaged, April decisions as to whether to move forward with second stage

Lambeth Updates

- Exploring opportunities for design codes, including a potential Waterloo Design Code SPD – Waterloo Masterplan sit alongside it, early days
- Whole Plan Viability Assessment for Lambeth will be published alongside Reg 19 – prepared by BNP Paribas
- Site Allocations DPD agreed for an 8-week Reg 19 consultation – contemplating whether to start this month but taking internal advice about potential overlap with pre-election period for Mayoral elections
- Local Plan Review is programmed to start towards end of 2024, but could be delayed if SADPD consultation is delayed
- Lambeth are planning to publish LDS imminently
- Kennington Oval Vauxhall Neighbourhood Plan emerging soon – TD to clarify if shares boundary with Wandsworth
- Lambeth are also working on an Article 4 direction for HMOs – two wards
- SoCGs for emerging Local Plan wrapped up

Wandsworth and Lambeth
Duty to Co-operate Meeting Notes
06th June 2024

Attendees:

- Richard Crutchley (RC) - Wandsworth
- Amy Ingle (AI) – Wandsworth
- Bebert Longi (BL) – Wandsworth
- Thomas Davies (TD) – Lambeth (Senior Planner)
- Bernard Lean (BL) – Lambeth (Management Trainee)
- Phillip Gill (PG) – Lambeth (Principal Planner)

Discussion:

Introductions

RC ran through the changes to the Wandsworth team including Bebert's new role from Pathways to Planning

Update on Wandsworth Local Plan Partial Review

- RC: Recapped discussion in January on the reasons for undertaking the partial review. The ambition is focussed on 3 key areas of LP23 'Affordable Housing':
 - To seek a 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: We have appointed ORS (Housing Needs Assessment) and BNP Paribas (Whole Plan Viability Assessment). We are developing the supporting documentation e.g. DtC Statement, Consultation Statement.
- RC: We are yet to start drafting policy wording and are waiting for the evidence from consultants. RC explained how reviewing the policy could have secondary impacts on other areas of the plan such as housing mix and student accommodation policy.
- RC: We are expecting a first full draft of the HNA this week and reporting to members next week. We aim to have a final report by mid-July.
- PG asked about cross-boundary impacts on unmet housing need. Lambeth don't have any unmet needs from adjoining Boroughs at the moment. RC stated we don't expect the current situation to change but will keep Lambeth informed as the partial review progresses.
- PG: Lambeth are fully on board with maximising affordable housing provision.
- RC: LBW are looking at how the threshold approach relates to our emerging policy. If not in accordance with London Plan, we will need a strong and robust evidence base to state why.
- PG: What is evidence pointing towards in terms of small sites:
 - RC: Too early to say, but Richmond policy uses a 'sliding scale' approach to AH contributions for small sites. This has proven problematic for DM officers, and so

we would be unlikely to replicate this here. LBW leaning towards per unit contributions.

- PG: Lambeth members are also looking to maximise AH delivery, and so expect to cover these issues too.
- PG: A lot of what LBW are reviewing in the Local Plan is most likely what Lambeth will lean towards in their own reviews.
- LBW to send draft/final HNA report over to Lambeth when it is complete.

Student Housing

- TD: Have LBW had an increase in applications for Student Housing in recent months? Lambeth have experienced an increase in discussions around alternative uses for sites. RC: there have been applications, especially on the east side of the borough closest to Lambeth (Vauxhall/Nine Elms). LBW have seen built to rent and co-living applications coming through also. The previous HNA was concerned with HEPs at St Georges (Tooting) and Roehampton Uni. Developers are citing other HEP's such as Royal College of Dance. Provided sites can demonstrate some form of transport accessibility, it can be difficult to resist student accommodation in many London Boroughs.
- TD: Similar to LBW, pressure is for C3 housing in Lambeth and there are concerns that student housing could impede the delivery of C3 housing. There is a strong argument from developers that PBSA can take pressure away from HMO's and private rented sector, freeing homes up for others.
- RC: We have grappled with definitions of 'over concentration' of single person households and the extent of a 'neighbourhood'.
- TD: On balance, it is difficult to set a threshold which demonstrates an over-concentration of student housing.
- AL: Questioned Lambeth's student housing policy re. public use of leisure facilities
 - TD: Only been one or two applications come through since their policy was adopted (Lambeth to come back on this)
- RC: Draft LPG was published on student housing. Would like a discussion with the GLA about this – look forward to how this is reviewed in the London Plan.
- TD: Important to consider the full lifetime of the development. Looking at how these buildings will be reused if no longer needed for student housing, especially where no open space or amenity space is provided.

Other Projects in LBW

- RC: Clapham Junction Masterplan. Consultants are WW+P. This project primarily looks at solving capacity issues at Clapham Junction railway station and placemaking initiatives around the station. LBW are evaluating development opportunities for the town centre and railway station itself and LBW hope to begin stakeholder engagement in the coming months. The site is discussed as an opportunity area in the London Plan and it is clear there are lots of opportunities there.
- PG: Lambeth also undertaking similar project with Waterloo Railway Station.
- RC: LBW are pulling together viability guidance.
- New directorate of 'Place' being developed in LBW.

Update from Lambeth

- PG: LBL are progressing Site Allocations Development Plan Document. Recent consultation ended in May. Unlikely to be any implications for Wandsworth on this.
 - TD: Will be running an additional consultation and will include Wandsworth in this – will most likely be received in the next couple of weeks.
- RC: LBW had a notification about Kennington, Oval, Vauxhall Neighbourhood Plan (no implications).
- TD: Work on Article 4 Direction for HMO's is paused until post-election.
- TD: Waterloo Design Code SPD – Design and Conservation Team leading on this workstream. Historic England in process of publishing London wide studies which will provide an evidence base.
- PG: Lambeth have a new Assistant Director of Policy and Place shaping (Ciara Whelehan).

AOB

- LBW to share minutes with LBL.
- LBL happy to collaborate on SoCG when time comes.

Wandsworth and Lambeth
Duty to Co-operate Meeting Notes
16th January 2025 @ 14:00

Attendees:

- Daniel Goodman (DG) – Wandsworth
- Amy Ingle (AI) – Wandsworth
- Bebert Longi (BL) – Wandsworth
- Steven Heywood (SH) – Lambeth
- Thomas Davies (TD) – Lambeth
- Philip Gill (PG) – Lambeth

Discussions

Introductions

- Attendees introduced themselves and their role.
- SH is new policy team lead at Lambeth.

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 shortly afterwards.
 - 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 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.
- TD asked if there was a lower threshold on the small sites aspect.
 - DG noted that there wasn't and this was calculated on a gross basis.

- TD asked how the PBSA policy was worded to set out when Wandsworth would not accept PBSA on sites suitable for conventional housing?
 - DG noted that the wording was fairly plain about land being safeguarded for conventional housing but available online for consultation and will consider feedback. DG also noted that there has been a downturn in the market for conventional housing development in favour of PBSA.
- DG noted that Wandsworth have looked at examples from elsewhere when drafting their policies
- DG noted that Lambeth are invited to make representations on the proposals and emphasised that the review does not change any allocations and that the main ambition is to maximise the delivery of affordable housing.
- DG noted that Wandsworth would be in touch to discuss the Statement of Common Ground closer to submission stage.
- TD asked how Wandsworth organise their consultation database.
 - DG noted that Wandsworth use the Objective platform which holds the database. Consultees are added to the database when they make representations unless they opt out.

Update from Lambeth

- PG gave an update on the site allocations DPD. This was submitted for examination in 2024 and Lambeth have now got 6 hearing dates in February and March. Lambeth have also received MIQ's from the inspector.
- TD noted that Lambeth have a signed Statement of Common Ground with Wandsworth from last year regarding the DPD.
- DG asked if Lambeth have considered when they will be publishing a new LDS, and mentioned that Wandsworth hope to do this following the partial review.
 - SH mentioned that Lambeth will probably take a similar approach and that Lambeth will also be looking at the possibility of undertaking a full review of their local plan. SH noted that Lambeth were awaiting the Infrastructure bill.

AOB

- DG noted that Wandsworth have published a copy of the Duty to Cooperate Statement online as part of the consultation on the partial review.
- DG provided an update on the Clapham Junction Masterplan project to note this has now progressed to Stage 2.