

Statement of Common Ground Between the London Boroughs of Wandsworth and the Mayor of London concerning the Local Plan Partial Review

Date: 27.10.2025

Version: 3

Overview

1.1 This document represents a Statement of Common Ground (SOCG) between the London Borough of Wandsworth (LBW) and the Mayor of London, and concerns planning policies included in the Local Plan Partial Review at the Regulation 19 stage of plan-making. The document sets out the matters agreed between the parties and the table in section 5 sets out the matters agreed and not agreed as part of duty to cooperate discussions.

1.2 The London Borough of 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.

1.3 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. The Council's aims for the review are to strengthen its affordable housing policy. Additionally, it includes changes to policies relating to housing mix, student accommodation, specialist housing for older people, build-to-rent properties and housing with shared facilities.

1.4 The Mayor of London is responsible for producing the London Plan, which sets out the strategic vision for the development of London over the next 20-25 years. This includes policies on the provision of housing, the management of waste, protection of the environment and promotion of economic development.

1.5. The Statement of Common Ground does not seek replicate the GLA's Regulation 19 response in its entirety with LB Wandsworth providing a response to key matters raised. The GLA have submitted a hearing statement on matters raised below in light of additional viability information provided, which includes SD043 (addendum to the Whole Plan Viability Assessment: Site Testing).

Duty to Cooperate

2.1 LBW and the Greater London Authority (GLA) have had a number of Duty to Cooperate meetings throughout the Local Plan process. A list of these meetings, with an overview of the relevant matters discussed, can be found in Appendix 1.

Key Strategic Matters

3.1 Through correspondence and discussions between LBW and the GLA, the following have been identified as strategic issues for continued liaison:

- Affordable Housing
- Student Accommodation
- Build to Rent Accommodation
- Housing with Shared Facilities
- Specialist and Older Persons Housing

Matters where Parties Agree

4.1. The Matters listed below are statements which the LBW and GLA have agreed. For ease, they are structured under headings relating to each of the main matters.

M1: Legal Requirements

4.2 Notwithstanding any matters which are not common ground between the parties, both parties consider that they have each co-operated effectively and on an ongoing basis throughout the preparation of the Wandsworth Local Plan Partial Review.

4.3 Notwithstanding those matters which the GLA considers to not be in general conformity with the London Plan, both parties consider that the Wandsworth Local Plan Partial Review has been prepared in accordance with all other relevant legal and regulatory requirements.

M2: Affordable Housing

4.4 Save for those matters set out in the GLA's formal representation, which are addressed in Section 5 to this Statement, both parties are satisfied that all other provisions within draft Policy LP23 (Affordable Housing) are in general conformity with the London Plan, including provisions relating to the tenure mix and mechanism for securing affordable housing from small sites.

M3: Housing Mix

4.5 Both parties are satisfied that the provisions of draft Policy LP24 (Housing Mix) are in general conformity with the London Plan.

M4: Purpose-Built Student Accommodation

4.6 Subject to those matters set out within the GLA's formal representation, which are addressed in Section 5 of this Statement, both parties are satisfied that the principle of seeking conventional affordable housing from purpose-built student accommodation, in

addition to affordable student accommodation, is in general conformity with the London Plan.

4.7 Save for those matters set out in the GLA's formal representation, which are addressed in Section 5 of this Statement, both parties are satisfied that all other provisions within draft Policy LP28 (Purpose-Built Student Accommodation) are in general conformity with the London Plan.

M5: Housing with Shared Facilities

4.8 Save for those matters set out in the GLA's formal representation, which are addressed in Section 5 of this Statement, both parties are satisfied that all other provisions within draft Policy LP29 (Housing with Shared Facilities) are in general conformity with the London Plan.

M6: Build to Rent

4.9 Save for the concerns noted below in terms of the affordable housing threshold (referred to within this Policy) and, provided a modification is made to draft Policy LP30 (Build to Rent) which specifies that the remaining 30 per cent of affordable units should be provided as intermediate housing, Policy LP30 (Build to Rent) would be in general conformity with the London Plan.

M7: Specialist and Older Persons' Housing

4.10 Both parties are satisfied that draft Policy LP31 (Specialist Housing for Vulnerable and Older People) makes appropriate reference to the Mayor's indicative benchmark figure, as set out in Table 4.3 of the London Plan, and is, in all other respects, in general conformity with the London Plan.

Table of representations, LBW response

5.1 The below table details the matters raised by the GLA on behalf of the Mayor of London as representations to the Regulation 19 Local Plan Partial Review, and the status of those representations.

5.2. The table seeks to provide clarification and clarity to the extent to which matters raised by the Mayor are resolved or remain unresolved. The table therefore represents the current agreed position in respect of the agreements and differences between LBW and the Mayor.

Subject	GLA Regulation 19 Response	Borough Response	Common Ground Agreed?
Affordable Housing	The Mayor notes that Policy LP23 of the draft Plan reflects his strategic target that 50 per cent of all new housing is to be affordable, as set out in Policy H4 of the LP2021. This is welcomed.	The Mayor's support for the Council's 50% affordable housing target is noted and welcomed.	Agreed.
Fast Track Threshold	In order for residential planning applications on private land to follow the Fast Track Route (FTR), LBW are proposing to set the affordable housing threshold at 45 per cent, which is higher than the 35 per cent threshold level for private, non-industrial land set out in the LP2021.	The Council has developed Policy LP23 to be in general conformity with the London Plan, including through retention of a 50% strategic target and a Fast Track Route, whilst incorporating additional requirements justified on the basis of local circumstances. The Council notes and does not dispute the Mayor's view that the London Plan's Fast Track Route has supported an increase in the delivery of affordable housing London-wide. However, it is the Council's view that in seeking to set a requirement at a level which is achievable London-wide, the specific thresholds included in Policy H5 of the London Plan forego opportunities to deliver much needed affordable housing in Boroughs such as Wandsworth which have the market conditions and sites available to deliver a greater amount of affordable housing on private sites. The additional affordable housing would support the delivery of the Mayor's strategic 50% target across London, which will help compensate for other boroughs where market conditions mean delivering higher levels of affordable housing are challenging. This is supported by the Council's detailed viability evidence and a number of instances where the Council has been able to negotiate affordable housing contributions in excess of the applicable threshold. Further evidence to justify this approach is set out within the Councils Hearing Statement and the Housing Background Paper.	Not agreed
Application of Late Stage Review	It is also noted that Policy LP23 part D2 sets out a requirement for late-stage reviews for developments which follow the FTR. Insisting on a late-stage review for fast tracked developments is not in accordance with Policy H5 and could further disincentivise applicants from following the FTR. LBW are urged to remove this requirement from the policy and to follow the approach to review mechanisms set out in the LP2021.	The application of a Late Stage Review for Fast Tracked developments providing between 45-50% is intended to provide further incentives for applicants to maximise the amount of affordable housing they deliver in the context of the overall 50% strategic target set out in both the London Plan and Council's Local Plan. This approach is similar to that included as part of Islington's adopted Local Plan which was considered in general conformity to the London Plan.	Not agreed

Student Accommodation	Draft Policy LP28 supports the provision of purpose-built student accommodation (PBSA) on sites that are not suitable for conventional housing and seeks a financial contribution towards affordable housing equivalent to Local Plan Policy LP23. Whilst the Mayor does not object to the requirement for financial contributions towards conventional C3 affordable housing, it should be noted that LP2021 Policy H15 states that affordable student housing should be sought in the first place.	Policy LP28 sets out that student housing schemes will be expected to contribute to both conventional affordable housing and affordable student housing (in line with the London Plan) which has been tested as part of the Whole Plan Viability Assessment. The Council has recommended a potential modification to Paragraph 17.43 for the Inspector to consider which would further clarify how the Council expects developers to calculate and prioritise their contributions towards both types of affordable housing. The Council have sought the prioritisation in this way due to the exceptional need for general needs affordable housing, as referenced within the Housing Needs Assessment and further justification to the policy approach is set out in Section 19 to the Housing Background Paper. Proposed modification M28/4: The financial contribution should be calculated on the basis of the difference between the Gross Development Value including the relevant policy requirement of affordable habitable rooms, and the Gross Development Value of the scheme with no affordable habitable rooms provided, subject to viability. <u>Developments must provide a fully compliant contribution to both affordable student housing and conventional affordable housing to be eligible for the Fast Track Route set out in Policy LP23 (Affordable Housing). Where a development cannot viably provide a policy-compliant contribution towards both affordable student housing and conventional affordable housing, applicants must provide viability evidence in line with Policy LP23. Developments will be expected to first maximise their contribution towards conventional affordable housing, and any surplus above reaching full policy-compliance to conventional affordable housing should be used to then maximise their contribution towards affordable student housing. More guidance will be set out in the Affordable Housing SPD and any successor document. Proposals for student accommodation should ensure that this financial contribution is prioritised</u>	Principle of modification agreed, but note concerns raised by the GLA in relation to LP23 which is referred to within the supporting text.
Student Accommodation	Furthermore, there should be provision allowing schemes to follow the FTR if they provide affordable student accommodation in line with Policy H15.	Proposals providing both forms of affordable housing would be eligible for the Fast Track Route. The Council has recommended a potential modification to the supporting text for the Inspector to consider which would make the relationship between the policy and the Fast Track Route clearer. This is included as part of proposed modification M28/4 as set out above.	Agreed.

Build to Rent Accommodation	Draft Policy LP30 of the Plan sets out that for Build to Rent developments to follow the Council's FTR 70 per cent of the overall affordable housing requirement should be provided as social rented units, with the remaining 30 per cent of units provided as a range of genuinely affordable rents. In line with LP2021, for clarity, the policy should specify that the remaining 30 per cent of affordable units should be provided as intermediate housing (e.g. London Living Rent or Discounted Market Rent). The GLA has published the Accelerating Housing Delivery Planning and Housing Practice Note December 2024 which provides further support in the delivery of intermediate rent units, relating to the maximum income threshold, maximum housing costs, and flexibility on grant funding eligibility.	The Council has recommended a potential modification for the Inspector to consider which would update the supporting text to clarify that the remaining 30% should be a range of intermediate rents, rectifying the concerns raised by the GLA. Proposed Modification M30/1: Where a development has potential to include more than one residential core and/or block, applicants should use this separate core and/or block to provide low cost rented housing to be managed by a registered provider. To follow the Council's Fast Track Route, 70 per cent of the overall affordable housing requirement should be provided as social rented units within this separate core and/or block, with the remaining 30 per cent at a range of genuinely affordable intermediate rents to meet priority housing need in Wandsworth.	Agreed, subject to modification .
Housing with Shared Facilities	Draft Policy LP29 of the Plan requires schemes for housing with shared facilities which do not provide a contribution equivalent to at least 50 per cent of units to be subject to review mechanisms. This is not consistent with LP2021 Policy H16 which sets the requirement at 35 per cent and should be amended accordingly.	The Council consider that Housing with Shared Facilities have a number of very similar attributes to PBSA and for consistency should have similar obligations applied to avoid inadvertently prioritising certain types of housing. The changes proposed to Policy LP29 are required for consistency with Policy LP23. Overall, the Council has taken a balanced and evidence-based approach to meeting high levels of affordable housing need whilst maintaining overall deliverability and is informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The Whole Plan Viability Assessment demonstrates that a significant number of development typologies would be viable at a 45% threshold. Further detail on this matter is included within the Councils Hearing Statement. The policy also retains a Viability Tested Route which means that developments which cannot maintain viability whilst meeting the requirements of the policy can still receive planning permission. Overall, the Council considers its policy approach to be effective, justified and deliverable. Detailed justification for the policy approach, having regard to housing need, housing supply and viability can be found in Sections 8-11 and 15 to the Housing Background Paper.	GLA officers do not consider this as a general conformity concern, however this is not agreed.

Specialist and Older Persons Housing	Draft Policy LP31 seeks to protect existing specialist and supported housing where it is considered suitable for its use and sets out the criteria that needs to be addressed should it be proposed to be redeveloped or re-purposed. While that is welcomed, the draft Plan should establish what the need is for specialist older persons housing. In the absence of a figure of need, LBW should rely on the Mayor's indicative benchmark figure which is set out in Table 4.3 of the LP2021 for the delivery of 120 new homes a year. In accordance with Policy H13 of the LP2021 and in order to meet identified need, LBW should work in collaboration with providers to identify sites which may be suitable for specialist older persons housing	Policy LP31 makes reference, at Paragraph 17.70, to the London Plan's benchmark target for older person's housing and makes clear that this should be considered in the context of more detailed local assessments of specific types of need. Paragraph 17.70: London Plan Policy H13 sets an indicative annual benchmark for the borough of 120 units of specialist older persons housing, and this should be considered in the context of more detailed local assessments of specific types of need. Provision of specialist older persons' accommodation will be monitored against the London Plan annual borough benchmark.	Agreed.
Viability Assessment	The draft Plan is supported by a viability assessment. Officers have reviewed this assessment and have the following comments for your consideration: 1. The majority of the scenarios tested in the viability assessment appear to be unviable with 45 per cent affordable housing, especially for private, non-industrial sites which have higher benchmark land value (BLVs). The net to gross ratios assumed for the residential typologies in the viability testing seem optimistic. Evidence should be provided to justify the net to gross assumptions adopted in the whole plan viability assessment with reference to recent cases in the borough to ensure that they are realistic.	Further information regarding the viability of common typologies tested is set out in detail within the Housing Background Paper. In summary, the Housing Background Paper sets out that the most common site types within the Council's housing pipeline are existing retail, industrial, and cleared land, which together account for over 62% of projected completions. In contrast, only 7.5% of housing completions are projected to be on sites with existing office space. Overall, the Whole Plan Viability Assessment results show that when using the outputs within Appendix 8 of the document, which includes a policy compliant tenure mix and a realistic housing mix, 77% of the models tested can viably provide 45% affordable housing within BLV 2, 3 and 4 (this includes retail, industrial and cleared land respectively). This figure reduces to around 70% of models being viable at 45% affordable housing when the BLV 1 (existing office space) is included, and does show a more challenging viability picture due to the higher existing use value of office space. However, as stated above, a small proportion of the Council's housing pipeline is on existing office space. In addition, where sites are generating high levels of income and where existing buildings optimise the use of the site, which is the case for many existing office uses, landowners are clearly far less likely to release land for development	Not agreed

		which means these sites are very unlikely to come forward for development. It would be unrealistic to base the borough's viability position on one BLV which illustrates a more challenging position, makes up a relatively small proportion of projected housing completions, and is, in any case, generally protected from re-development by adopted Local Plan policy LP33. Net to gross ratios are based on observed ratios seen across a range of live developments, however, as a result of the updated fire regulations, BNPP have provided some additional testing which applies a gross to net ratio which is more reflective of the recent changes. However, it should be noted that not all new developments will be impacted by the updated fire regulations, so an overall average of 77% gross to net has been applied in the additional testing.	
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Signatures

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Name: Adam Hutchings Date: 24/10/2025

Signed on behalf of the London Borough of Wandsworth

A handwritten signature in black ink, appearing to be 'L Turner'.

Name: Lucinda Turner Date: 27/10/2025

Signed on behalf of the Greater London Authority

Appendix 1: List of meetings between LBW and the GLA and overview of the issues discussed

Meeting / Response Date	Summary of Relevant Matters Discussed
05.12.2023	Representation received as part of Regulation 18 consultation See representation published on the Greater London Authority website here.
23.01.2024	LBW provided an overview of the Local Plan Partial Review and the nature of the Regulation 18 responses received to date. GLA expressed a potential concern over any disapplication of threshold / fast track approach, however the GLA clarified they would not be completely opposed to policies which take a locally justified approach to affordable housing where this leads to an increase in affordable housing delivery. GLA showed a willingness to consider any additional evidence that LBW provide, with this informing the GLA view on conformity with the London Plan. GLA clarified their general presumption as being that the existing threshold approach increases affordable housing overall and speeds up the planning process, and that any disapplication could have the unintended consequence of reducing affordable housing delivery by requiring more schemes to go through the viability tested approach.
07.06.2024	LBW provided an update on the status of the Partial Review and progress made on policy options and the evidence base following the previous meeting. GLA noted they had no objections in principle to the Council's aspirations regarding small site affordable housing contributions or tenure split but reiterated a potential concern regarding any approach which exceeds the 35% affordable housing threshold set out in the London Plan. The GLA noted they consider that they have robust evidence that the threshold approach works well and is delivering good numbers of affordable housing. The GLA emphasised that because of the extent of evidence they have to support this policy and that it would be challenging for a borough to challenge this unless their own evidence suggests otherwise. The GLA noted they consider their evidence to demonstrate that applications which go down the Viability Tested Route deliver fewer affordable housing units overall. In relation to student housing, the GLA advised LBW to review Islington's draft policy which focussed on prioritising conventional housing which is the approach LBW was minded to pursue. .
18.09.2024	LBW provided an update on the status of the Partial Review, and progress made on policy options and the evidence base following the previous meeting. LBW presented the GLA with draft policy wording for LP23, LP24 and LP28 and discussed the rationale and evidence behind choice of policy wording to meet LBW ambitions.

	GLA raised no specific objections to policies LP24 and LP28, however did note that they may have concerns over LP23, which was proposed to amend the London Plan's threshold approach. LBW reiterated their justification and evidential basis for the policy.
10.12.2024	LBW provided an update on the status of the Partial Review, and progress made since the previous meeting on the evidence base, including the Regulation 19 policies that had been subject to a Transport Committee decision on 19th November 2024. The GLA highlighted a potential concern over the proposed wording for LP23 which would introduce an alternative threshold to the London Plan approach. LBW reiterated their justification and evidential basis for the policy. It was agreed that the GLA would make formal representations on these matters during the Regulation 19 consultation, having first had due regard to the Council's evidence base.
12.02.2025	LBW provided an update on the status of the Partial Review, and progress made since previous meeting, including the launch of the Regulation 19 consultation in January 2025. GLA provided an overview of matters that would be raised within their Regulation 19 response. It was noted the response would raise that the approach to affordable housing provision was not in general conformity with the London Plan.
24.02.2025	Representation received as part of Regulation 19 consultation See representation published on the Greater London Authority website here.
24.09.2025	LBW provided an overview of the additional viability information requested. GLA discussed past approval rates, housing mix, site testing, and provided an overview of outstanding concerns in terms of the approach to affordable housing set out in the Local Plan.

