

**Draft Revised Lambeth Local Plan
Proposed Submission Version
January 2020**

**Duty to Co-operate Statement
of Compliance**

May 2020

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1. National policy and guidance on duty to cooperate in plan-making

Introduction

As set out in the Planning and Compulsory Purchase Act 2004 (PCPA), local planning authorities (LPAs) must cooperate with each other and prescribed bodies during the preparation of development plan documents. The National Planning Policy Framework 2019 (NPPF) states that local planning authorities are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries. In the Procedure Guide for Local Plan Examinations (June 2019), the Planning Inspectorate states that in order to demonstrate compliance with the duty to co-operate the most helpful approach is for the LPA to submit a statement of compliance with the duty and that the statement of compliance should identify any relevant strategic matters and how they have been resolved. Therefore this Statement is intended to demonstrate Lambeth's compliance with the duty to co-operate during the preparation of the Draft Revised Lambeth Local Plan Proposed Submission Version January 2020.

The NPPF advises that LPAs should prepare one or more statements of common ground (SCG) with relevant bodies, using the approach set out in national planning guidance. In accordance with the guidance, statements of common ground have been agreed with each of Lambeth's neighbouring boroughs and with 15 waste planning authorities that receive 'strategic' amounts of waste exports from Lambeth. These were [published](#) online in December 2019 prior to Regulation 19 pre-submission publication.

The PPG also outlines that LPAs must publish information at least annually that reports any activity relating to the duty to cooperate. Lambeth's Authority Monitoring Reports (AMRs) for [2016/17](#), [2017/18](#) and [2018/19](#) detail the duty to cooperate activity Lambeth has actively participated in, with whom, and by what means for each financial year. Information relating to the development of statements of common ground is also included within the duty to cooperate sections of these AMRs. The information included within the duty to cooperate sections of those AMRs has been collated together as is set out in sections 4, 5, and 6 below. Lambeth's duty to cooperate activity with its neighbours and prescribed bodies for 2019/20 is also set out in those sections of this statement. The AMR 2019/20 will be published later in 2020.

In accordance with Section 24(4)(a) of the Planning and Compulsory Purchase Act 2004 and Regulation 21 of the 2012 Regulations, on 31 January 2020 (the first day of pre-submission publication) Lambeth requested the opinion in writing of the Mayor of London as to the general conformity of the Draft Revised Lambeth Local Plan Proposed Submission Version and associated Proposed Changes to the Policies Map (January 2020) with the Mayor's London Plan, which is the spatial development strategy for London. The Mayor responded on 13 March 2020 (the final day of pre-submission publication) to state that overall the Mayor considered that Lambeth's Regulation 19 Draft Local Plan was in general conformity with the London Plan (by which he refers to the Draft London Plan Intend to Publish version December 2019). However, the Mayor made a number of detailed comments about aspects of the draft Plan. Lambeth officers have discussed these comments with the Mayor's officers and have agreed a SCG with the Mayor, including a number of proposed amendments to plan wording to address some of the comments made. This SCG has been submitted for examination and published as part of documents supporting submission.

National planning policy and guidance

Paragraphs 24 to 27 of the NPPF 2019 set out government expectations for maintaining effective cooperation. They state that:

- Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.
- Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans. They should also engage with their local communities and relevant bodies including Local Enterprise Partnerships, Local Nature Partnerships, the Marine Management Organisation, county councils, infrastructure providers, elected Mayors and combined authorities (in cases where Mayors or combined authorities do not have plan-making powers).
- Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.
- In order to demonstrate effective and on-going joint working, strategic policymaking authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance, and be made publicly available throughout the plan-making process to provide transparency.

The Planning Practice Guidance adds that:

- The duty to cooperate places a legal duty on local planning authorities and county councils in England, and prescribed public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plan and marine plan preparation in the context of strategic cross boundary matters.
- Certain other public bodies are also subject to the duty to cooperate. These are prescribed in the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended):
 - the Environment Agency
 - English Heritage (now called Historic England)
 - Natural England
 - the Mayor of London
 - the Civil Aviation Authority
 - the Homes and Communities Agency
 - Clinical Commissioning Groups
 - the National Health Service Commissioning Board (now called NHS England)
 - the Office of Rail and Road
 - Transport for London
 - each Integrated Transport Authority
 - Highway authorities
 - the Marine Management Organisation

- Local enterprise partnerships
 - Local nature partnerships
- These organisations are required to cooperate with local planning authorities and county councils in England, and the other prescribed bodies. All parties should approach the duty in a proportionate way, tailoring cooperation according to where they can maximise the effectiveness of plans.
 - Local Enterprise Partnerships and Local Nature Partnerships are not subject to the requirements of the duty, but local planning authorities and county councils in England, and prescribed public bodies must cooperate with them. Local planning authorities must have regard to their activities when they are preparing their local plans, so long as those activities are relevant to plan-making.
 - A statement of common ground is a written record of the progress made by strategic policy-making authorities during the process of planning for strategic cross-boundary matters. It documents where effective co-operation is and is not happening throughout the plan-making process, and is a way of demonstrating at examination that plans are deliverable over the plan period, and based on effective joint working across local authority boundaries. In the case of local planning authorities, it also forms part of the evidence required to demonstrate that they have complied with the duty to cooperate.
 - Statements need be prepared and then maintained on an on-going basis throughout the plan making process. As a minimum, a statement needs to be published when the area it covers and the governance arrangements for the cooperation process have been defined, and substantive matters to be addressed are determined. If all the information required is not available (such as details of agreements on strategic matters) authorities can use the statements to identify the outstanding matters which need to be addressed, the process for reaching agreements on these and (if possible) indicate when the statement is likely to be updated.

2. Defining Lambeth's duty to cooperate bodies

The local planning authorities that share borders with Lambeth are:

- City of London
- City of Westminster
- London Borough of Bromley
- London Borough of Croydon
- London Borough of Merton
- London Borough of Southwark
- London Borough of Wandsworth

For some of the other prescribed public bodies, there are particular circumstances in London, which need to be explained:

The Environment Agency

The Environment Agency (EA) is a government body, established in 1996 to protect and improve the environment. Within England the EA are responsible for regulating major industry and waste,

treatment of contaminated land, water quality and resources, fisheries, inland river, estuary and harbour navigations, conservation and ecology, and managing the risk of flooding from main rivers, reservoirs, estuaries and the sea.

English Heritage (now called Historic England)

Historic England (HE) are a public body that helps people care for, enjoy and celebrate England's historic environment. HE protect, champion and save the places that define who we are and where we've come from as a nation. HE work includes championing historic places; identifying and protecting our heritage; supporting change; understanding historic places and providing expertise at a local level.

Natural England

Natural England (NE) are the government's adviser for the natural environment in England, helping to protect England's nature and landscapes for people to enjoy and for the services they provide. NE are responsible for promoting nature conservation and protecting biodiversity; conserving and enhancing the landscape; securing the provision and improvement of facilities for the study, understanding and enjoyment of the natural environment; promoting access to the countryside and open spaces and encouraging open-air recreation; contributing in other ways to social and economic well-being through management of the natural environment.

The Mayor of London

The Mayor of London sets the budget and is responsible for making London a better place for everyone who visits, lives or works in the city. The Mayor is elected every four years. The Mayor wants London to be a 'city for all Londoners'. His work includes making it easier for people to move in and around the city, improving London's environment, helping the capital's businesses to thrive, providing Londoners with more affordable housing, giving young people in London more opportunities.

The Civil Aviation Authority

There are no airfields within the borough of Lambeth. However, it is the Civil Aviation Authority's (CAA) and local Air Traffic Control centres' responsibility to ensure safe helicopter flights across London.

Homes and Communities Agency

The powers of the Homes and Communities Agency are devolved in London to the Mayor.

The National Health Service Commissioning Board (now called NHS England)

NHS England is an executive non-departmental public body, sponsored by the Department of Health and Social Care. NHS England authorises the new clinical commissioning groups, which are the drivers of the new, clinically-led commissioning system introduced by the Health and Social Care Act.

From 1 April 2019, NHS England and NHS Improvement are working together as a new single organisation to better support the NHS to deliver improved care for patients. As local health systems work more closely together, the same needs to happen at a national level. Their new single operating model has been designed to support delivery of the NHS Long Term Plan.

Engagement between Lambeth and NHS England has taken place through Lambeth's cooperation with the CCG.

Clinical Commissioning Group

The Lambeth Clinical Commissioning Group (CCG), a group of 45 GP practices in the borough, work with the council and pharmacies, dentists, hospitals and mental health providers, to commission NHS services for residents. The Lambeth Public Health Directorate now sits within the council. The Director of Public Health for Lambeth is a role across Council and NHS. The Director is a member of the Health and Wellbeing Board and Lambeth CCG Governing Body, and chairs the Staying Healthy Board, which is the partnership that helps to drive delivery of CCG and Council health improvement and illness prevention priorities.

Also within the public health team, the Head of Health Intelligence supports the function of public health developing evidence. Another member leads on work with the CCG and council on long term conditions, individual funding requests, and has research links with Kings College and LSE. This member is also a member for the National Institute for Health and Care Excellence (NICE) public health advisory committee on PH guidelines development.

The team also has consultant lead for maternity, children and young people, and substance misuse who attends a range of meetings relevant to this portfolio including the local safeguarding children board and the children and families strategic partnership. There are several large children and young people's (CYP) projects that Lambeth Public Health is involved in including LEAP, an early years initiative and CYP Health Partnership, a healthcare public health one.

Office of Rail and Road

Lambeth has regular contact with Network Rail and the Train Operating Companies (South Western Railway, Southeastern, Southern, Thameslink and London Overground).

Integrated Transport Authority

In London, the equivalent of the Integrated Transport Authority is Transport for London.

Highway authorities

In Lambeth, the highway authorities are Lambeth council or Transport for London, depending on the type of road.

Marine Management Organisation (MMO)

The MMO is the marine planning authority for England responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. In Lambeth, this applies to the river Thames.

Local Enterprise Partnership

The local enterprise partnership for London is the London Economic Action Panel (LEAP) and is chaired by the Mayor of London. The LEAP brings entrepreneurs and business together with the Mayorality and London Councils to identify strategic actions to support and lead economic growth and job creation in the capital. The purpose of the LEAP is to contribute to the delivery of the Mayor's economic development strategy, supported by strong local partnership arrangements.

Local Nature Partnership

In 2012 the nominal Local Nature Partnership (LNP) for London was the All London Green Grid (ALGG), which acted in this capacity subject to a new and specific LNP being developed for Greater London. Eleven [ALGG Area Frameworks](#) were produced which expanded on the implementation points and strategic opportunities set out in the ALGG Supplementary Planning Guidance (SPG). These frameworks were produced by various All London Green Grid Area groups; the central area framework covers Lambeth, and the borough assisted in the development and refinement of these area frameworks where they were relevant to it.

However, the ALGG has since evolved to exist purely to promote the design and delivery of 'green infrastructure' across London, including biodiversity and open space provision, and it does not function as a LNP in its current role. The Greater London Authority acts as the owner of the ALGG, and the ALGG SPG and area frameworks can be obtained from the GLA [website](#).

This means that Greater London is without a LNP as of 2020, due to funding and other national policy constraints, and that responsibility for determining biodiversity and nature conservation policy at a local borough level rests with each London borough, although the Mayor of London still sets out regional policy which each borough then implements or applies through local actions.

Discussions started in 2019 between representatives of the London boroughs (via the London Boroughs Biodiversity Forum) and Natural England, the Government's nature conservation agency, as to reconstituting a cross-metropolis partnership that could provide the function similar to a LNP, especially in the light of emerging national policy on 'biodiversity net gain' and encouraging greater 'cross-borough working to accommodate opportunities for delivering biodiversity net gain on a wider geographical scale. Further development work is due to take place in 2020 on this subject.

Lambeth Council continues to actively cooperate with those statutory agencies and public bodies that would not only be an integral part of a Greater London LNP if it existed, but also across a wide range of biodiversity, green infrastructure and open spaces issues affecting the borough. This includes cooperating with other London boroughs, Greater London Authority, Environment Agency, Natural England, Network Rail and Port of London Authority, as and when required by national legislation or regional/local policy. It also cooperates with a wide range of non-governmental organisations that would also be members of a functional LNP such as London Wildlife Trust, RSPB (Royal Society for the Protection of Birds), TCV (The Conservation Volunteers) and Woodland Trust as and when required to deliver local and regional policies.

Lambeth Council also continues to cooperate through the London Boroughs Biodiversity Forum (LBBF) and the Association for Local Government Ecologists (ALGE), which provides professional advice and information relating to biodiversity, green infrastructure and open spaces management; Lambeth is a full and active member of both bodies. Lambeth also liaises, via LBBF and ALGE, with officers having biodiversity, green infrastructure and open space management responsibilities in other local authorities that border Lambeth as well as across the metropolis as a whole.

3. Formal partnerships

Lambeth is a member of various formally constituted sub-regional partnerships and working groups, which address cross-border strategic matters. These are described below.

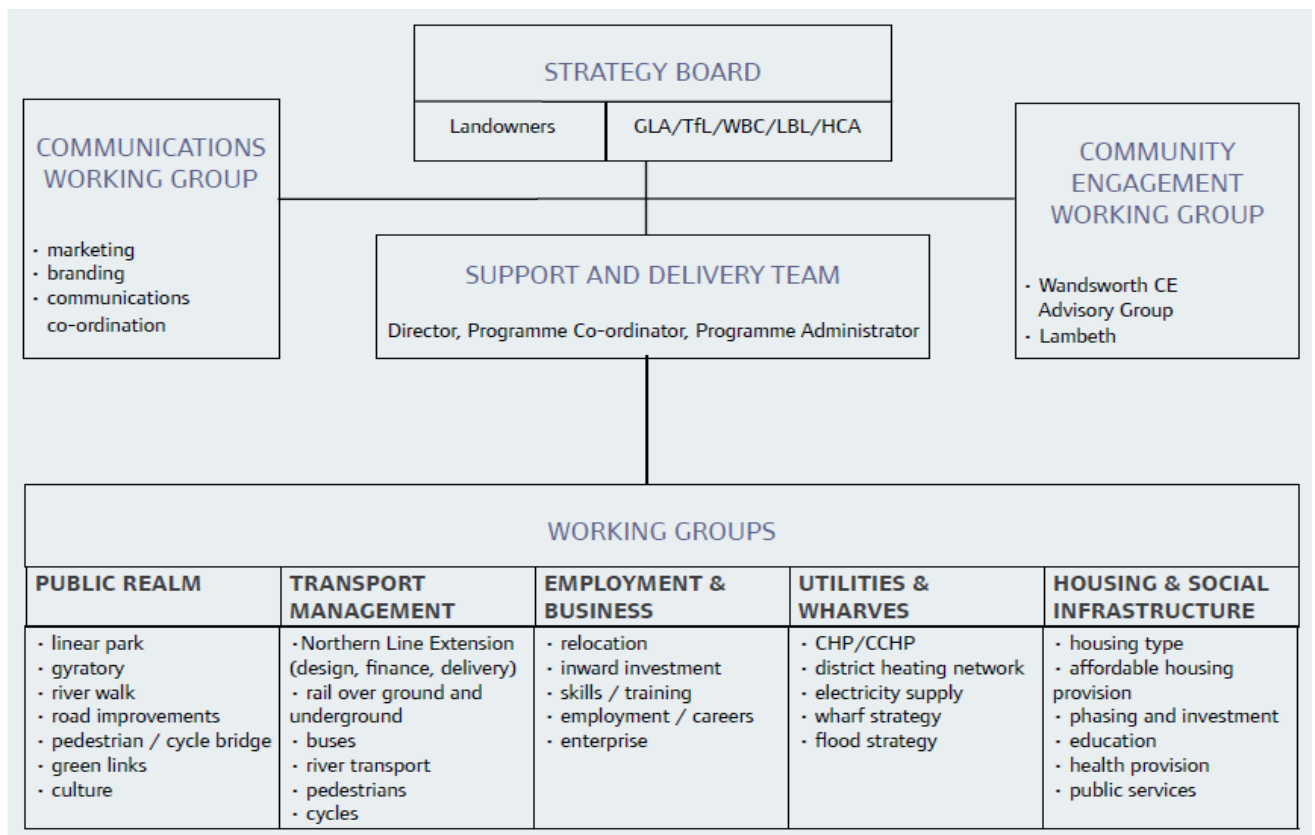
Lambeth First Strategic Partnership Board includes the Clinical Commissioning Group and brings together the public, private, voluntary and community sectors to work together to improve the quality of life for all who live in, work in and visit Lambeth.

Western Riverside Waste Authority (WRWA) comprises four boroughs in the ‘Western Riverside’ area of London. It is responsible for disposal of household waste. The Western Riverside waste planning authorities of Lambeth, Kensington & Chelsea, Hammersmith & Fulham, Wandsworth and the Old Oak and Park Royal Development Corporation (OPDC) have been working together on waste planning since 2015.

Central London Forward represents the seven central London local authorities: Camden, City of London, Islington, Kensington and Chelsea, Lambeth, Southwark and Westminster. Its primary objectives are to influence policy on major issues affecting central London, promote the strategic importance and needs of central London, and identify and facilitate co-ordinated working on areas of mutual interest to partners

The **Cross-River Partnership** includes the central London boroughs along with business groups and other key stakeholders such as Network Rail, Groundwork London, London & Partners, Transport for London and the GLA. Its key focus is on economic growth, sustainable employment, carbon reduction and place-making.

The **Vauxhall Nine Elms Battersea Strategy Board** was established in 2009 to provide strategic leadership for the implementation of the Opportunity Area Planning Framework for Vauxhall Nine Elms Battersea (now known as Nine Elms Vauxhall). It is co-chaired by the leaders of Wandsworth and Lambeth councils and meets bi-monthly, as do subject-specific working groups. It is attended by major landowners, developers and officers of the public authorities. The following diagram shows the governance structure of the board.



In addition to the strategy board, Lambeth Council initiated the formation of a landowners group for Vauxhall in 2011. The group includes the major landowners within the Vauxhall area, is chaired by

the leader of Lambeth Council and meets every three months to discuss issues related to development in Vauxhall.

The **South Bank Partnership** is jointly chaired by the two local MPs and includes the leaders and local members of the London boroughs of Lambeth and Southwark, together with business and community organisations. The South Bank Employers' Group provides the secretariat for the partnership.

The **South Bank and Bankside Cultural Quarter** (SBBCQ) is a partnership consisting of 30 cultural organisations, local authorities including Lambeth, business improvement districts and universities. The partnership is director-led and meets approximately three times a year.

4. Record of progress made since 2016 with prescribed bodies

The following section provides a record of duty to cooperate activity with each of the prescribed bodies relevant to Lambeth between April 2016 and March 2020.

The Environment Agency

The council liaises on an ongoing basis with the Environment Agency (EA) around implementing strategies to provide additional opportunities for protecting and improving wetland and aquatic habitats across the borough, both with respect to existing bodies of standing water and rivers or streams. These schemes are also designed to maximise the capacity of these habitats to collect, store and slowly release floodwaters, whether from excessive or storm-related rainfall or from surface (including spring-related) flooding.

2016/17

In April 2016, Lambeth officers notified and invited the Environment Agency (EA) to make comments on its draft Sustainability Appraisal scoping report (Scoping Report) for the review of the Lambeth Local Plan. In June 2016, the EA provided comments on the Scoping Report. Lambeth subsequently incorporated all the EA's suggested changes to the Scoping Report.

In December 2016 Lambeth officers notified and invited the Environment Agency (EA) to make comments on two Supplementary Planning Documents (SPDs); its Draft Employment and Skills SPD and its Draft Development Viability SPD and corresponding initial SEA screening assessments of each SPD. In January 2017, the EA provided comments, agreeing with the findings of the initial screening assessment that the Draft Development Viability SPD is unlikely to have any significant environmental effects and therefore a full Strategic Environmental Assessment will not be required.

In February 2017, the EA provided representations on both SPDs. Regarding the Development Viability SPD, the EA stated that they encourage growth that can be supported by the necessary environmental infrastructure, for instance water resources and flood risk management provided in a co-ordinated and timely manner to meet the physical and social needs of both new development and existing communities. All of the Environment Agency's comments and the council officer response are viewable in the [Development Viability SPD Consultation Statement 2017](#).

Regarding the Employment and Skills SPD, the EA stated they support the purpose of the document to seek from developers' contribution towards a range of employment and training measures to mitigate the impacts of development and to ensure that local people can better access job

opportunities arising from new development. All of the Environment Agency's comments and the council officer response are viewable in the [Draft Employment and Skills SPD Consultation Statement](#).

In November 2016, on behalf of South Bank and Waterloo Neighbourhood (SoWN), Lambeth notified the Environment Agency and invited them to make representations on the pre-submission draft South Bank & Waterloo Neighbourhood Plan. No representations were received.

In December 2016, Lambeth consulted the EA on the initial screening assessment of the draft SoWN Plan and invited them to provide comments. In January 2017, the EA provided comments on the initial screening assessment, agreeing with the conclusion that South Bank & Waterloo Neighbourhood Plan is unlikely to have any significant environmental effects and therefore a full Strategic Environmental Assessment will not be required.

2017/18

Officers in Lambeth's planning policy team met with the Environment Agency in November 2017 to discuss Lambeth's Local Plan review. Officers explained how Environment policies are likely to change and the EA provided some initial feedback. Officers also showed how the sustainability appraisal feeds into the Local Plan review process and explained how Lambeth demonstrates transparency by creating a table of SA recommendations with officer responses.

The EA were notified and invited to make representations on Lambeth's initial regulation 18 'issues' stage of the local plan review, and associated sustainability appraisal, in October 2017. The EA provided comments in relation to flood risk, contaminated land, water resources and quality, biodiversity and waste. The EA stated that they wished to see the Local Plan review aligning with the Environment Agency Thames Estuary Plan and that consideration should also be given to the Strategic Flood Risk Assessment, Preliminary Flood Risk Assessment, Environment Agency Flood Maps, Flood Risk Management Plan and Surface Water Management Plan. Summaries of the points raised by the Environment Agency are viewable in the Lambeth's [Issues Consultation Report October 2018](#).

In April 2017, Lambeth notified and invited the EA to make comments on Lambeth's Revised Draft Development Viability SPD. The Environment Agency stated in May 2017 that they have no further comments to add to their February 2017 response.

In April 2017, Lambeth notified and invited the EA to make comments on an application for the designation of the Norwood Planning Assembly Neighbourhood Forum and Neighbourhood Area. The EA provided comments in May 2017 stating that the proposed area boundary follows the valley of the culverted Effra River and therefore as the competent authority in respect of flood risk matters, the EA will provide information and data to guide development in the neighbourhood.

In July 2017, Lambeth notified and invited the EA to make comments on an application for the designation of the Herne Hill Forum Neighbourhood Forum and Neighbourhood Area. In September 2017, the EA provided comments - the culverted Effra River flows through the area in a northerly direction. The Herne Hill, Brixton and Norwood areas are impacted from upstream surface water flows from the London Boroughs of Southwark and Croydon, and it will therefore be important that the flood risk is managed at a catchment scale by all Councils.

In September 2017, Lambeth notified and invited the Environment Agency to make comments on Lambeth's updated initial screening assessment of the Draft Lambeth Development Viability SPD. Lambeth's opinion was that the Final Draft Lambeth Development Viability SPD would not have

significant environment effects and therefore a full Strategic Environmental Assessment (SEA) would not be required. The Environment Agency responded and agreed with the findings of the SEA Screening Report.

In October 2017, Lambeth notified the Environment Agency and invited them to make representations on the submission version South Bank and Waterloo Neighbourhood Plan (SoWN) and Lambeth's addendum to the initial SEA screening assessment. The EA responded and agreed with the conclusion of the updated screening assessment that there are unlikely to be significant effects of the Plan and therefore a full SEA would not be necessary.

In October 2017, Lambeth officers notified the EA that they had produced a draft Basements SPD and invited the EA to provide comments. In December 2017, the EA stated that, overall, all aspects of their remit have been adequately addressed. The Flood and Water Management Act 2010 places the responsibility for surface water runoff, groundwater and ordinary watercourses with the Lead Local Flood Authority (LLFA). In this case, it is the London Borough of Lambeth.

In November 2017, Lambeth notified and invited the Environment Agency to make comments on Lambeth's Revised Draft Employment and Skills SPD. The Environment Agency provided comments in December 2017 and stated that they had no comments to make on the draft SPD.

In November 2017 Lambeth officers notified the EA that they had undertaken an initial SEA screening assessment of the draft Basements SPD and invited the EA to provide comments. The EA provided comments in February 2018, agreeing with the results of the council's initial SEA screening assessment which concluded that the draft Basements SPD is unlikely to have significant effects on the environment and so a full SEA will not be required.

In January 2018 Lambeth officers contacted the EA regarding their draft SEA screening assessment of the Lambeth Employment and Skills SPD and invited the EA to make representations. Officers asked the EA to confirm that it was unlikely the SPD would have significant environmental effects and therefore a full SEA is not required. The EA responded stating that they agreed that the Employment and Skills SPD proposed for adoption is unlikely to have significant environmental effects and a full SEA is not required.

In March 2018, on behalf of Kennington Oval and Vauxhall (KOV) Forum, Lambeth notified the EA and invited them to make representations on the pre-submission draft Kennington Oval and Vauxhall (KOV) Neighbourhood Plan. No representations were received.

2018/19

The Environment Agency was notified and invited to make representations on Lambeth's regulation 18 consultation on its DRLLP, and associated Sustainability Appraisal, in autumn 2018. The EA provided comments which focused on flood risk and resilience, environmental infrastructure, water management, and intensification of development. The EA said that to manage further intensification in the urban areas will require improvements to a range of infrastructure and services to meet the additional needs and avoid detrimental effects on the quality of life and the environment. Capital funding sources must be identified and a clear commitment shown to the provision of infrastructure before new housing development is allowed to proceed so as to mitigate the impact and not make any deficiencies worse. All of the Environment Agency's comments and the council officer response are viewable in the [Lambeth's Draft Revised Lambeth Local Plan October 2018 Consultation Report 2019](#).

In April 2018, Lambeth notified the EA that it had undertaken an initial Strategic Environment Assessment (SEA) screening assessment of the draft Kennington Oval and Vauxhall (KOV) Neighbourhood Plan (pre-submission consultation draft March 2018). Lambeth outlined that their initial assessment indicates that the draft neighbourhood plan may have significant environmental effects and therefore does require an Environmental Assessment. In May 2018, the EA stated that they agreed that the pre-submission consultation draft KOV neighbourhood plan may have significant environmental effects and therefore will require an environmental assessment.

In November 2018, Lambeth notified the EA that the South Bank and Waterloo Neighbours (SoWN) Neighbourhood Forum had submitted a draft of the SoWN Neighbourhood Plan to Lambeth and Southwark councils and invited the EA to make representations. Lambeth also notified the EA and invited them to make representations on an application to re-designate the SoWN Neighbourhood Forum. In December 2018, the EA stated that whilst they supported the plan, the EA would wish to see it aligning with the Environment Agency Thames Estuary 2100 (TE2100) Plan. It provides a plan for improving the tidal flood defence system for the period to 2100 so that current standards of flood protection are maintained or improved taking account of sea level rise. It should also seek to ensure that it reflects the riverside strategy concept and promote an integrated approach to riverside development that takes full account of future flood risk requirements and opportunities to provide wider environmental enhancements.

2019/20

In January 2020, Lambeth notified the EA and invited them to make representation on the pre-submission publication of the Draft Revised Lambeth Local Plan Proposed Submission Version (DRLLP PSV) and associated Proposed Changes to the Policies Map (January 2020), and associated Sustainability Appraisal. In March 2020, the EA stated that they had no further comments to make following their responses on previous drafts – the EA are supportive of the policies included that protect the environment and seek to reduce flood risk.

In February 2020, Lambeth notified the EA and invited them to make representations on two SPDs – the Draft Affordable Workspace SPD and the Draft Design Code SPD. Lambeth also notified the EA that they had undertaken an initial SEA screening assessment for each document, and invited the EA to also make representations on these initial screening assessments.

Historic England

2016/17

In April 2016, Lambeth officers notified and invited the Historic England (HE) to make comments on its draft Sustainability Appraisal scoping report (Scoping Report) for the review of the Lambeth Local Plan. HE provided representations. Lambeth officers responded to each of their comments on the Scoping Report; these can be viewed as [Appendix 3 to the Scoping Report](#). In summary HE stated that they welcomed the incorporation of the recent Good Practice in Planning Advice Notes 1, and 3, and suggested it would also be suitable to incorporate reference to GPA 2 Managing Significance in Decision-Taking in the Historic Environment, and the Mayor's SPG on World Heritage Sites. These documents were therefore subsequently included in the SA process. HE also confirmed that the baseline information in Appendix 2 for the built heritage in Lambeth provides useful information covering both designated heritage assets and undesignated assets, including locally listed buildings and Archaeological Priority Areas. Their representation stated they were also pleased to see

reference to the Westminster World Heritage Site (WHS) in the baseline for the historic environment. They suggested that the baseline should also draw on the local views information that is currently available in the Council's local views study and any further views that have been identified since that study. Accordingly, baseline data on local views was updated. Regarding the Sustainability Framework; a prompt question relating to the historic environment of SA objective 8 was also amended in response to a comment from HE.

Lambeth officers met with Historic England in February 2017 to discuss proposed Local Plan policy changes and the best way forward regarding evidence supporting the Westminster World Heritage Site designation.

In December 2016 Lambeth officers notified and invited HE to make comments on its Draft Employment and Skills SPD and its Draft Development Viability SPD and corresponding initial SEA screening assessments of each SPD. HE provided comments on the draft Employment and Skills SPD in January 2017, agreeing that it is unlikely the SPD would have significant environmental effects and therefore a full SEA is not required. Regarding the draft development viability SPD, HE stated that with respect to the SEA screening report they have no reason to disagree with the conclusion that SEA is not required.

In November 2016, on behalf of SoWN, Lambeth notified HE and invited them to make representations on the pre-submission draft South Bank & Waterloo Neighbourhood Plan. No representations were received.

In December 2016, Lambeth consulted HE on the initial screening assessment of the draft SoWN Neighbourhood Plan and invited them to provide comments. In January 2017, HE provided comments on the initial screening assessment, one of which states that they agreed with Lambeth's screening opinion that there are unlikely to be significant environmental effects to the historic environment caused by this Plan, and therefore it would not require an environmental assessment.

In February 2017, Lambeth officers met with Historic England to discuss the partial review of the Lambeth Local Plan and emerging SPDs (Local Views and Basements). Neighbourhood Plans and their associated SEA screening assessments were also discussed as was the Westminster World Heritage Site and studies to support work on the new London Plan.

2017/18

Lambeth officers met with Historic England in November 2017. Updates to existing policies as part of the Local Plan review process were discussed as were potential ways forward with regard to managing development in areas of Lambeth that could impact on the Westminster World Heritage site. Policies in the draft London Plan were also analysed i.e. the design led approach.

Historic England were notified and invited to make representations on Lambeth's initial regulation 18 'issues' stage of the local plan review, and associated sustainability appraisal, in October 2017. Historic England provided comments on the issues for the review of the Lambeth Local Plan and Sustainability Appraisal in December 2017. HE response was made in the context of the National Planning Policy Framework and its core planning principle that planning should conserve heritage assets in a manner appropriate to their significance so that they can be enjoyed for their contribution to the quality of life both now and for future generations. HE also provided comments on the Scoping Report. Lambeth subsequently responded by incorporating all the HE's suggested changes to the Scoping Report and answered each of HE queries. Summaries of Historic England's comments are viewable in Lambeth's [Issues Consultation Report 2018](#).

In April 2017, Lambeth notified and invited Historic England to make comments on Lambeth's Revised Draft Development Viability SPD. In May 2017, HE provided comments stating that they previously identified the need to integrate consideration of conservation requirements into assessments of viability where sites contain heritage assets requiring investment. HE advised that it will be helpful to highlight this aspect in Lambeth's heritage strategy to make this connection, if not in this document. Lambeth addressed this comment in the revisions to the SPD. All of the HE's comments on the SPD are viewable in Lambeth's [Development Viability SPD Consultation Statement 2017](#).

In April 2017, Lambeth notified and invited Historic England to make comments on an application for the designation of the Norwood Planning Assembly Neighbourhood Forum and Neighbourhood Area. HE replied in April 2017 and stated that if appointed, HE look forward to considering their neighbourhood area assessment that is anticipated to include due consideration of the built and buried heritage assets.

In July 2017, Lambeth notified and invited HE to make comments on an application for the designation of the Herne Hill Forum Neighbourhood Forum and Neighbourhood Area. In August 2017, HE provided comments stating that they normally advocate that Neighbourhood Plans should respect pre-defined boundaries such as those for conservation areas. This is because the boundaries of conservation areas should cover clearly defined character areas. As such respecting these boundaries in the plan making process is important in ensuring a consistent application of planning policies for the historic environment. This in turn will better protect local character and identity from piecemeal change. HE also provided general advice on developing a Neighbourhood Plan.

In September 2017, Historic England were notified and invited to make comments on Lambeth's updated initial screening assessment of the Draft Lambeth Development Viability SPD. Lambeth's opinion was that the Final Draft Lambeth Development Viability SPD would not have significant environment effects and therefore a full SEA would not be required. No comments were received.

In October 2017, Historic England were notified and invited to make representations on the submission version SoWN Neighbourhood Plan and Lambeth's addendum to the initial SEA screening assessment. No comments were received.

In October 2017, Lambeth officers notified the HE that they had produced a draft Basements SPD and invited the HE to provide comments. In December 2017, HE provided comments and welcomed section 4 referring to assessment of impacts on heritage assets.

In November 2017, Lambeth officers met with Historic England to discuss the partial review of the Lambeth Local Plan, including which areas of the Plan are being subject to review. Both parties also discussed the WWHS setting study and associated mapping. HE provided an update of their work on the Draft London Plan.

In November 2017, HE were notified and invited to make comments on Lambeth's Revised Draft Employment and Skills Planning Obligations SPD. In December 2017, HE replied by outlining that they had no further comments.

In November 2017 Lambeth officers contacted Historic England notifying them that Lambeth had undertaken an initial SEA screening assessment of the draft Basements SPD and invited them to provide comments. No comments were received.

In January 2018, Historic England were notified and invited to make representations on Lambeth's draft Screening Statement on its Employment and Skills SPD proposed for adoption. Historic England

responded that month, agreeing with the conclusion of the screening report that SEA is not required.

In March 2018, on behalf of KOVF, Lambeth notified Historic England and invited them to make representations on the pre-submission draft KOV Neighbourhood Plan. No comments were received.

2018/19

Lambeth officers met with Historic England (HE) in July 2018. Existing policies being updated as part of the Local Plan review were discussed (including tall building and views) as was Lambeth's approach to managing development in areas of the borough that could impact on the Westminster World Heritage site. Lambeth's involvement in the development of the Westminster World Heritage Site management plan was also discussed. Policies in the draft London Plan were analysed as was their link to the Mayor's Cultural Strategy.

Historic England were notified and invited to make representations on Lambeth's regulation 18 consultation on its DRLLP, and associated Sustainability Appraisal, in autumn 2018. Historic England provided extensive comments on the DRLLP and associated Sustainability Appraisal in December 2018. A considerable number of changes were made to the DRLLP in response to HE's comments, prior to Regulation 19 publication. All of Historic England's Regulation 18 comments and the council officer response are viewable in the [Lambeth's Draft Revised Lambeth Local Plan October 2018 Consultation Report 2019](#).

In April 2018, Lambeth notified HE that it had undertaken an initial Strategic Environment Assessment (SEA) screening assessment of the draft KOV Neighbourhood Plan (pre-submission consultation draft March 2018). Lambeth outlined that their initial assessment indicates that the draft neighbourhood plan may have significant environmental effects and therefore does require an Environmental Assessment. In June 2018, HE provided comments and outlined that they agreed with the Council's conclusion that SEA would be required for this Neighbourhood Plan, due to the likely significant environmental effects, including to heritage, which flow from the site allocation policy for the Oval Gasworks site.

In July 2018, Lambeth officers met with Historic England to discuss their Regulation 18 comments and the resulting updates to DRLLP and work on the new London Plan. Work on the WWHS management plan was also discussed. Lambeth informed HE of work being undertaken by Miller Hare which will be used to inform Lambeth's upcoming WWHS Setting Study. Lambeth's Tall Buildings and Local Views Policy and evidence base were also reviewed.

In November 2018, Lambeth notified HE that the SoWN Neighbourhood Forum had submitted a draft of the SoWN Neighbourhood Plan to Lambeth and Southwark councils and invited HE to make representations. Lambeth also notified HE and invited them to make representations on an application to re-designate the SoWN Neighbourhood Forum. In December 2018, HE provided comments stating that they were content that the draft plan is in general conformity with local and national policy and the "Basic Conditions". In the event of the plan being approved HE would continue to encourage the Neighbourhood Forum to consider developing a positive strategy for the historic environment and how new development can contribute to preserving and enhancing local historic character. HE also stated they are content for the re-designation to be determined by the Council as they see fit, on the advice of their own specialist staff.

2019/20

Lambeth officers met with Historic England (HE) in May 2019, to discuss further revisions to Lambeth's draft Tall Buildings policy and its related evidence base. Both parties also discussed Annex 11 of the DRLLP and the potential for Heritage Assessments. A policy covering Heritage At Risk was also discussed.

Also in May 2019, Lambeth explained to HE its approach to preparation of a separate Site Allocations DPD, and highlighted that the GLA is supportive of this process and has awarded HCF funding for the SADPD on this basis. Explanations of approaches in different parts of the Plan were given to HE and a working draft of policy Q26 and Annex 11 was also sent to HE including justifications for the proposed approach. HE were invited to make informal comments on these parts of the draft Plan.

In September 2019, Lambeth provided updates by email to HE on its emerging revised draft Policy Q26 on Tall Buildings, following discussions with the Mayor's London Plan team.

In November 2019, Lambeth sent a revised draft of Tall Buildings policy Q26 to HE. Lambeth also sent their draft Tall Buildings Topic Paper that was prepared to provide a narrative on the evidence base and on the policy position reached. Lambeth invited HE to provide informal comments on the Topic Paper.

In December 2019, Lambeth officers met with HE to discuss Lambeth's Tall Buildings policy and Topic Paper. HE suggested further refinement to the policy text which officers considered, and the text was subsequently updated. The Topic Paper was also refined in response to HE comments.

In January 2020, Lambeth notified HE and invited them to make representation on the pre-submission publication of the DRLLP PSV and associated Proposed Changes to the Policies Map (January 2020), and associated Sustainability Appraisal. HE provided comments in March 2020 and stated that the DRLLP PSV represents heritage well throughout. HE also stated that the approach to the strategic site allocations is clear and well evidenced, but added that where sites have been allocated more detail could be included in the development requirements to provide a clearer direction for decision makers and applicants. HE welcomed the plan's commitment to producing a Heritage Strategy. They recommended that policy EN4 on sustainable design and construction be amended to make reference to how historic buildings should be approached. HE went on to state that there is still concern about policy Q26 on tall buildings and how part (b) can be reconciled with London Plan policy and the NPPF; and this is the only outstanding reason why they consider the plan to be unsound. Lambeth council's responses to HE's comments are set out in the Regulation 22 Consultation Statement.

In February 2020, Lambeth notified HE and invited them to make representations on two SPDs – the Draft Affordable Workspace SPD and the Draft Design Code SPD. Lambeth also notified HE that they had undertaken an initial SEA screening assessment for each document, and invited HE to also make representations on these initial screening assessments.

Natural England

Lambeth continues to liaise with Natural England on identifying potential LNRs to designate under similar powers to those used for Streatham Common in 2013, and another three candidate sites have been identified for further evaluation.

Lambeth also liaises with agencies such as the Forestry Commission and Natural England on developing and implementing policies and procedures for managing wildlife diseases or invasive species, in order to minimise the impact they have on existing habitats and species, and to ensure the retention of a functional green infrastructure. For example, the council has been working with the Forestry Commission on recording the presence of Oak Processionary Moth (OPM), Ash Dieback Disease and Sudden Oak Death Syndrome, and in treating or containing areas affected by such notifiable diseases so as to minimise the loss or degradation of wildlife habitat or the removal or loss of notable trees, or planting alternative tree species that are more resistant to the effects of disease but still contribute to the borough's biodiversity and green infrastructure.

See also commentary above regarding Local Nature Partnerships.

2016/17

In April 2016, Lambeth officers notified and invited Natural England (NE) to make comments on its draft Sustainability Appraisal scoping report (Scoping Report) for the review of the Lambeth Local Plan. In June 2016, NE responded by recommending a separate objective relating to the creation, management and enhancement of green infrastructure rather than listing it under objective 10 biodiversity. Lambeth subsequently included a new SA Objective on green infrastructure.

In December 2016 Lambeth officers notified and invited the Natural England (NE) to make comments on its Draft Employment and Skills SPD and its Draft Development Viability SPD and corresponding initial SEA screening assessments of each SPD. In December 2016, NE stated that the topic of the SPDs do not appear to relate to their interests to any significant extent and so they did not wish to comment. In February 2017, Natural England provided comments on the SEA screenings, agreeing that for both screenings, full SEA is not required.

In November 2016, on behalf of SoWN, Lambeth notified the NE and invited them to make representations on the pre-submission draft South Bank & Waterloo Neighbourhood Plan. No representations were received.

In December 2016, Lambeth consulted Natural England on the initial screening assessment of the draft SoWN Neighbourhood Plan and invited them to provide comments. In February 2017, Natural England were again notified and invited to make representations. Natural England responded by stating that the conclusion drawn in Lambeth's SEA screening of the Plan is acceptable and that the plan wouldn't require a full SEA.

2017/18

Natural England were notified and invited to make representations on Lambeth's initial regulation 18 'issues' stage of the local plan review, and its associated Sustainability Appraisal, in October 2017. No comments were received.

In April 2017, Lambeth notified and invited Natural England to make comments on Lambeth's Revised Draft Development Viability SPD. No comments were received.

In April 2017, Lambeth notified and invited Natural England to make comments on an application for the designation of the Norwood Planning Assembly Neighbourhood Forum and Neighbourhood Area. In May 2017 NE provided information sources that could be used in developing plans, and highlighted some of the potential environmental risks and opportunities that neighbourhood plans may present.

In July 2017, Lambeth notified and invited Natural England to make comments on an application for the designation of the Herne Hill Forum Neighbourhood Forum and Neighbourhood Area. In August 2017, NE provided information sources that could be used in developing plans, and highlighted some of the potential environmental risks and opportunities that neighbourhood plans may present.

In September 2017, Natural England were notified and invited to make representations on Lambeth's updated initial screening assessment of the Draft Lambeth Development Viability SPD. Lambeth's opinion was that the Final Draft Lambeth Development Viability SPD would not have significant environment effects and therefore a full SEA would not be required. Natural England responded by agreeing that no further full assessment would be required in this instance.

In October 2017, Lambeth notified Natural England and invited to make representations on the submission version SoWN Neighbourhood Plan and Lambeth's addendum to the initial SEA screening assessment. Natural England responded by stating that there are unlikely to be significant environmental effects from the proposed plan.

In October 2017, Lambeth officers notified NE that they had produced a draft Basements SPD and invited NE to provide comments. In November 2017, NE stated that whilst they welcomed the opportunity to give views, the topic of the Supplementary Planning Document does not appear to relate to their interests and so they did not wish to comment.

In November 2017, NE were notified and invited to make comments on Lambeth's Revised Draft Employment and Skills Planning Obligations SPD. In January 2018, NE stated that whilst they welcomed the opportunity to give views, the topic of the Supplementary Planning Document does not appear to relate to their interests therefore they had no further comments.

In November 2017 Lambeth officers notified NE and invited them to make comments an initial SEA screening assessment of the draft Basements SPD. No comments were received.

In January 2018, Natural England were notified and invited to make representations on Lambeth's draft Screening Statement on its Employment and Skills SPD proposed for adoption. Natural England responded in January 2018 stating that they had no further comments.

In March 2018, on behalf of KOVF, Lambeth notified Natural England and invited them to make representations on the pre-submission draft KOV Neighbourhood Plan. No comments were received.

2018/19

Natural England (NE) were notified and invited to make representations on Lambeth's regulation 18 consultation on its DRLLP in autumn 2018. No comments were received.

After being notified and invited to make comments by Lambeth in March 2018, Natural England provided a representation on the draft KOV Neighbourhood Plan in April 2018, stating that they had no specific comments on the draft Plan.

In April 2018, Lambeth notified NE that it had undertaken an initial Strategic Environment Assessment (SEA) screening assessment of the draft KOV Neighbourhood Plan (pre-submission consultation draft March 2018). Lambeth outlined that their initial assessment indicates that the draft neighbourhood plan may have significant environmental effects and therefore does require an Environmental Assessment. In April 2018, Natural England stated that they have no specific comments to make regarding this consultation.

In November 2018, Lambeth notified NE that the SoWN Neighbourhood Forum had submitted a draft of the SoWN Neighbourhood Plan to Lambeth and Southwark councils and invited NE to make representations. Lambeth also notified NE and invited them to make representations on an application to re-designate the SoWN Neighbourhood Forum. In December 2018, NE outlined that they did not have any specific comments on this draft neighbourhood plan but outlined advice on how neighbourhood plans should consider the natural environment.

2019/20

In January 2020, Lambeth notified NE and invited them to make representation on the pre-submission publication of the DRLLP PSV and associated Proposed Changes to the Policies Map (January 2020), and associated Sustainability Appraisal. In February 2020, NE stated that they had no comments.

In February 2020, Lambeth notified NE and invited them to make representations on two SPDs – the Draft Affordable Workspace SPD and the Draft Design Code SPD. Lambeth also notified the NE that they had undertaken an initial SEA screening assessment for each document, and invited NE to also make representations on these initial screening assessments.

The Mayor of London

2016/17

In October 2016, the Mayor notified and invited Lambeth to make representations on 'A City for All Londoners'. Lambeth provided representations on the A City for All Londoners consultation in December 2016.

In November 2016, Lambeth notified the Mayor of London and asked him to provide comments on the pre-submission draft SoWN Neighbourhood Plan. In January 2017, the Mayor provided comments on the SoWN Neighbourhood Plan, making suggestions as to how the Plan should progress in light of the London Plan.

In December 2016 Lambeth officers notified and invited the Mayor to make comments on its Draft Employment and Skills SPD and its Draft Development Viability SPD. No comments were received.

2017/18

The Mayor was notified and invited to make representations on Lambeth's initial regulation 18 'issues' stage of the local plan review, and its associated sustainability appraisal, in October 2017. The GLA, on behalf of the Mayor, provided comments on Lambeth's initial issues consultation in autumn 2017. In summary, the Mayor stated that the draft new London Plan includes a new small sites target for housing. The Mayor recommended Lambeth's Local Plan includes a positive approach to small sites to meet the requirement in emerging Policy H2 for boroughs to prepare area-wide design codes to promote good design and higher densities on small sites. The Mayor also stated that genuinely affordable housing is a priority and he strongly encouraged Lambeth to adopt the affordable housing policies as set out in the draft new London Plan Policy - H5 Delivering affordable housing, Policy H6 Threshold approach to applications and Policy H7 Affordable housing tenure. He stated that he would have no objections to a policy seeking contributions from schemes of fewer than 10 dwellings. The Mayor also made comments relating to student housing, specialist older persons housing, offices, industrial land (the Mayor highlighted that Lambeth is categorised as a

borough that is required to retain its industrial capacity), Opportunity Areas, town centres, urban greening and waste. All of the Mayor's comments are viewable in Lambeth's [Issues Consultation Report 2018](#).

In April 2017, Lambeth notified and invited the Mayor to make comments on Lambeth's Revised Draft Development Viability SPD. No comments were received.

In April 2017, Lambeth notified and invited the Mayor to make comments on an application for the designation of the Norwood Planning Assembly Neighbourhood Forum and Neighbourhood Area. No comments were received.

In July 2017, Lambeth notified and invited the Mayor to make comments on an application for the designation of the Herne Hill Forum Neighbourhood Forum and Neighbourhood Area. No comments were received.

In October 2017, Lambeth notified the Mayor and invited him to make representations on the submission version SoWN Neighbourhood Plan. No comments were received.

In October 2017, Lambeth officers notified the Mayor that they had produced a draft Basements SPD and invited him to provide comments. No comments were received.

In November 2017, Lambeth notified and invited the Mayor to make comments on Lambeth's Revised Draft Employment and Skills SPD. No comments were received.

In December 2017, the Mayor notified and invited Lambeth to make representations on his draft London Plan 2017. In March 2018, Lambeth provided representations on the Mayor's Draft London Plan 2017. In summary, Lambeth stated that they supported the overall ambition and scope of the Plan and recognises the role of the London Plan in providing leadership and strategic direction on development and planning in London over the next 15-20 years. In Lambeth's view, the draft new London Plan provides the right strategic direction on many of the key challenges currently facing the capital. However Lambeth made detailed comments on individual policies including those covering the CAZ and Opportunity Areas. They stated that the proposed classifications of some of its town centres does not accurately reflect their scale and character. Regarding Strategic and local regeneration, Lambeth's stated the notion of a local area for regeneration is too simplistic and does not adequately reflect the perspective of local communities living in these areas. Lambeth would like to be able to identify and name its own priority areas for intervention, without using terminology imposed by the London Plan.

With regard to the small sites policy, Lambeth stated the preparation of design codes to cover all the circumstances affecting Lambeth will have very significant resource implications for the borough's planning service. There is strong concern about the poor outcomes that may result in the period before the design codes are in place. Lambeth also made detailed comments of design policies, housing and delivery of affordable housing (stating it supported the fast track criteria). Regarding Gypsy and Traveller accommodation, Lambeth strongly objected to the inclusion of a different definition of Gypsy and Traveller than that included in national Planning Policy for Traveller Sites (PPTS). Further comments were made on purpose-built student accommodation (PBSA), large-scale purpose built shared living and policies relating to social Infrastructure, the economy, heritage and culture, green infrastructure and the natural environment, sustainable infrastructure (including waste), transport, funding the London Plan and monitoring. All of Lambeth's comments of viewable on the Mayor of London's [website](#).

In March 2018, on behalf of KOVF, Lambeth notified the Mayor and invited him to make representations on the pre-submission draft Kennington Oval and Vauxhall (KOV) Neighbourhood Plan. No representations were received.

2018/19

The Mayor of London was notified and invited to make representations on Lambeth's regulation 18 consultation on its DRLLP, and associated Sustainability Appraisal, in autumn 2018. The GLA, on behalf of the Mayor, provided comments on the DRLLP during the consultation. In summary, the Mayor welcomed the overall approach to growth and development, the inclusion of Lambeth's new London Plan housing target of 1,589 dwellings per annum and the inclusion of the borough's housing trajectory along with indicative housing requirement figures for the five designated neighbourhood planning areas. With regards to town centres, the Mayor stated that he has no evidence that Waterloo and South Bank is functioning or has the potential to function as a Metropolitan Centre and advised Lambeth to apply an appropriate CAZ designation for the Waterloo and South Bank area to reflect its nature and the Council's vision for the area. Regarding gypsy and traveller needs, the Mayor stated that Lambeth should assess if there is any additional demand for pitches in its borough, in line with the draft new London Plan definition and find additional capacity, if required. The Mayor also made comments which specifically related to the DRLLP's Delivering the Vision and Objectives policies, Housing policies, Economic Development policies, Environment and Green Infrastructure policies, Places and Neighbourhood policies, Transport and communications policies, Quality of the Built Environment policies, air quality, site allocations and Knolly's Yard. All of the Mayor's comments and the council's officer responses are viewable in [Lambeth's Draft Revised Lambeth Local Plan October 2018 Consultation Report 2019](#).

In November 2018, Lambeth notified the Mayor that the SoWN Neighbourhood Forum had submitted a draft of the SoWN Neighbourhood Plan to Lambeth and Southwark councils and invited him to make representations. Lambeth also notified the Mayor and invited them to make representations on an application to re-designate the SoWN Neighbourhood Forum. In December 2018, the Mayor provided comments on the Plan. He stated he welcomes the aspirations of the Neighbourhood Plan in positively promoting green infrastructure, walking and cycling. The Plan sets out clearly the nature of projects it wishes to invest in throughout the neighbourhood area through the use of CIL and planning obligations. However, the neighbourhood plan is largely aspirational and could be more proactive in identifying suitable sites for a range of purposes including those for housing development in order to meet the neighbourhood area indicative housing requirement of 162 dwellings a year, set out in Lambeth's draft Local Plan.

The examination in public (EiP) of the Draft London Plan started in January 2019 and Lambeth participated by providing statements on three matters – town centres, gypsies and travellers and waste.

In February 2019, Lambeth officers met with members of the GLA's planning team to discuss the strategic importance of Waterloo to Lambeth and how this can be potentially reflected in the London Plan and Lambeth's Local Plan.

2019/20

In April 2019, Lambeth officers met with members of the GLA's planning team to discuss the Mayor's representations on Lambeth's regulation 18 consultation on its DRLLP in autumn 2018. In particular both parties discussed Lambeth's evidence on industrial land and Lambeth's proposed policy

approach to KIBAs in draft policy ED3. Lambeth made a number of changes to the approach to industrial land in policy ED3 in the DRLLP PSV in light of this discussion. The Mayor's comments following Regulation 19 publication acknowledge these changes but ask for additional clarification of the approach. The Council has proposed some further changes to the supporting text of policy ED3, which are set out in the SCG with the Mayor.

In April 2019, Lambeth officers met with GLA officers to discuss the Mayor's representations on Lambeth's regulation 18 consultation on its DRLLP in autumn 2018 specifically Lambeth's Tall Buildings policy Q26. In August 2019, Lambeth officers met again with members of the GLA's planning team to discuss further wording changes to the draft policy on tall buildings in the DRLLP, taking account of changes to the Draft London Plan policy that had emerged through the examination of that document. Lambeth subsequently sent an updated draft Local Plan policy text to the GLA who advised making some minor changes to policy D8 b). These changes were carried forward by Lambeth into the DRLLP PSV. The Mayor did not comment on policy Q26 following Regulation 19 publication.

In July 2019, Lambeth officers met with members of the GLA's planning team to discuss the question of Metropolitan Open Land at Hungerford Car Park. Lambeth subsequently sent through new draft wording for Policy PN1 of the DRLLP and invited the Mayor's officers to provide comments on this. The Mayor's officers sent comments on the new text in July 2019. Lambeth made further revisions to policy PN1 in the DRLLP PSV in light of the Mayor's comments. The Mayor did not comment on this wording following Regulation 19 publication.

In accordance with Section 24(4)(a) of the Planning and Compulsory Purchase Act 2004 and Regulation 21 of the 2012 Regulations, on 31 January 2020 (the first day of pre-submission publication) Lambeth requested the opinion in writing of the Mayor of London as to the general conformity of the Draft Revised Lambeth Local Plan Proposed Submission Version and associated Proposed Changes to the Policies Map (January 2020) with the Mayor's London Plan, which is the spatial development strategy for London. The Mayor responded on 13 March 2020 (the final day of pre-submission publication) to state that overall the Mayor considered that Lambeth's Regulation 19 Draft Local Plan was in general conformity with the London Plan (by which he refers to the Draft London Plan Intend to Publish version December 2019). However, the Mayor made a number of detailed comments about aspects of the draft Plan. Lambeth officers have discussed these comments with the Mayor's officers and have agreed a SCG with the Mayor, including a number of proposed amendments to plan wording to address some of the comments made. This SCG has been submitted for examination and published as part of documents supporting submission.

In February 2020, Lambeth notified the Mayor and invited him to make representations on two SPDs – the Draft Affordable Workspace SPD and the Draft Design Code SPD.

The Civil Aviation Authority

2016/17

Officers met with the Civil Aviation Authority (CAA) twice in 2016/17. The first meeting took place in August 2016 to explore the potential to create a new Battersea Heliport safeguarding zone. Within

such a zone, local planning authorities would be required to consult the CAA on planning applications that propose buildings over a certain height.

Officers also attended a meeting hosted by the CAA on 26th October 2016, which was also attended by LB Wandsworth, LB Hammersmith and Fulham, LB Westminster and LB Kensington and Chelsea. All boroughs agreed to work with the CAA to develop a Heliport Safeguarding Zone Map in which the CAA would request consultation on developments over a certain height. All parties involved agreed to adopt a new safeguarding zone. Consequently a Battersea Heliport Safeguarding Zone has been in force since February 2017. This means that Battersea Heliport and the Civil Aviation Authority are consulted on proposed developments within this zone that are over a certain height threshold – either 90m or 150m, depending on the location. A reference to this requirement was added to Lambeth's DRLLP policy Q26 on tall buildings.

The DfT added the London Heliport to the list of officially safeguarded aerodromes (Annex 3 of the Town and Country Planning (Safeguarded Aerodromes and Technical Sites and Military Explosives Storage Areas) Direction 2002.

In November 2016, Lambeth notified the CAA and asked them to provide comments on the pre-submission draft SoWN Neighbourhood Plan. No comments were received.

In December 2016 Lambeth officers notified and invited the CAA to make comments on its Draft Employment and Skills SPD and its Draft Development Viability SPD. No comments were received.

2017/18

The CAA were notified and invited to make representations on Lambeth's initial regulation 18 'issues' stage of the local plan review, and associated sustainability appraisal, in October 2017. No comments were received.

In April 2017, Lambeth notified and invited the Civil Aviation Authority (CAA) to make comments on Lambeth's Revised Draft Development Viability SPD. No comments were received.

In April 2017, Lambeth notified and invited the CAA to make comments on an application for the designation of the Norwood Planning Assembly Neighbourhood Forum and Neighbourhood Area. No comments were received.

In July 2017, Lambeth notified and invited the CAA to make comments on an application for the designation of the Herne Hill Forum Neighbourhood Forum and Neighbourhood Area. No comments were received.

In October 2017, Lambeth notified the CAA and invited them to make representations on the submission version SoWN Neighbourhood Plan. No comments were received.

In October 2017, Lambeth officers notified the CAA that they had produced a draft Basements SPD and invited them to provide comments. No comments were received.

In November 2017, Lambeth notified and invited the CAA to make comments on Lambeth's Revised Draft Employment and Skills SPD. No comments were received.

In March 2018, on behalf of KOVF, Lambeth notified the CAA and invited them to make representations on the pre-submission draft Kennington Oval and Vauxhall (KOV) Neighbourhood Plan. No representations were received.

2018/19

The CAA were notified and invited to make representations on Lambeth's regulation 18 consultation on its DRLLP, and associated Sustainability Appraisal, in October 2018. No comments were received.

In November 2018, Lambeth notified the CAA that the SoWN Neighbourhood Forum had submitted a draft of the SoWN Neighbourhood Plan to Lambeth and Southwark councils and invited the CAA to make representations. Lambeth also notified the CAA and invited them to make representations on an application to re-designate the SoWN Neighbourhood Forum. No comments were received.

2019/20

In January 2020, Lambeth notified the CAA and invited them to make representation on the pre-submission publication of the DRLLP PSV and associated Proposed Changes to the Policies Map (January 2020), and associated Sustainability Appraisal. No comments were received.

In February 2020, Lambeth notified the CAA and invited them to make representations on two SPDs – the Draft Affordable Workspace SPD and the Draft Design Code SPD.

Lambeth Clinical Commissioning Group (CCG)

2016/17

In October 2016, Lambeth met with the Lambeth Public Health team to discuss their Health and Wellbeing Strategy. With regard to the Local Plan review, Lambeth outlined the importance of the ongoing sustainability appraisal process and explained how Public Health would be able to influence the review at different stages of the plan making process.

Lambeth Council and its partners, the Clinical Commissioning Group (CCG), Guy's and St Thomas' NHS Foundation Trust (GSTT), South London and Maudsley NHS Foundation Trust (SLAM), Kings College Hospital (KCH), jointly submitted a bid to the Cabinet Office's One Public Estate programme in 2016/2017 and secured £275k of grant funding to undertake joint estates-based work. The funding was allocated towards developing a governance structure for the programme with a bi-monthly One Public Estate Partnership Board set up which was co-chaired by Lambeth and CCG staff. The bulk of the funding was directed toward the delivery of 4 projects, all of which were initiated in partnership with the aforementioned groups and with the CCG playing a leading role alongside the Council in determining their direction and delivery.

In November 2016, Lambeth notified the CCG and asked him to provide comments on the pre-submission draft SoWN Neighbourhood Plan. No comments were received.

In December 2016 Lambeth officers notified and invited the Mayor to make comments on its Draft Employment and Skills SPD and its Draft Development Viability SPD. No comments were received.

2017/18

Lambeth Council continued to work with the CCG and other One Public Estate partners throughout 2017/2018 across both the funded projects and One Public Estate Partnership Board. Lambeth and CCG staff continued to co-chair the Board meetings. The CCG also attended the Lambeth First Strategic Partnership Board ran by Lambeth Council. The Brixton Health Hub feasibility study, a key joint project undertaken by Lambeth Council and the CCG, was initiated in 2017/2018 and involved

close working between the two bodies to determine accurate population growth figures to be used in forecasting healthcare demand and supply in the borough.

In April 2017, Lambeth notified and invited the CCG to make comments on Lambeth's Revised Draft Development Viability SPD. No comments were received.

In April 2017, Lambeth notified and invited the CCG to make comments on an application for the designation of the Norwood Planning Assembly Neighbourhood Forum and Neighbourhood Area. No comments were received.

In June 2017, Lambeth officers attended the Lambeth Healthy Weight and Food Strategic Group (run by public health, attended by CCG) – where they provided an update on progress made on the Local Plan Review.

In July 2017, Lambeth notified and invited the CCG to make comments on an application for the designation of the Herne Hill Forum Neighbourhood Forum and Neighbourhood Area. No comments were received.

In July 2017 Lambeth officers met with a member of the public health team to give an update on the Local Plan and discussed how best to keep public health engaged in the process and updated going forward. Also in this month, planning policy officers attended the 'Lessons from the Food Flagship childhood obesity and healthy weight' conference organised by public health.

In October 2017, Lambeth notified the CCG and invited them to make representations on the submission version SoWN Neighbourhood Plan. No comments were received.

In October 2017 Lambeth planning policy officers attended the Health and Wellbeing Board and gave a presentation on the Local Plan Issues consultation at a statutory meeting. The Health and Wellbeing Board is attended by Councillors, Public Health and the CCG. The Board agreed they would coordinate a response to the Local Plan Issues.

In October 2017, Lambeth officers notified the CCG that they had produced a draft Basements SPD and invited them to provide comments. No comments were received.

In November 2017, Lambeth notified and invited the CCG to make comments on Lambeth's Revised Draft Employment and Skills SPD. No comments were received.

In November 2017 Lambeth planning policy officers attended the Lambeth Healthy Weight, Food and Physical Activity Strategic Group and gave an update on the Local Plan Issues consultation.

In March 2018, on behalf of KOVF, Lambeth notified the CCG and invited them to make representations on the pre-submission draft Kennington Oval and Vauxhall (KOV) Neighbourhood Plan. No representations were received.

2018/19

Lambeth officers met with NHS Lambeth (CCG) and London Healthy Urban Development Unit (HUDU) in May 2018 to discuss Lambeth's Infrastructure Delivery Plan (IDP) and the approach to planning for health infrastructure in the DRLLP.

In November 2018 Lambeth planning policy officers met with the Lambeth Staying Healthy Partnership to give an update on the Draft Revised Lambeth Local Plan consultation.

2019/20

In May 2019 a Lambeth planning policy officer met with the Lambeth Staying Healthy Partnership Board and gave a presentation on our engagement with Public Health so far and how the Local Plan incorporates health and wellbeing into the DRLLP policies.

In summer 2019 Lambeth planning policy officers engaged with Public Health to update the evidence to support DRLLP policy ED8 relating to A5 uses.

In January 2020, Lambeth notified the CCG and invited them to make representation on the pre-submission publication of the DRLLP PSV and associated Proposed Changes to the Policies Map (January 2020), and associated Sustainability Appraisal. The London Healthy Urban Development Unit (HUDU) submitted representations on behalf of Lambeth CCG in March 2020. In summary, the CCG suggested that the health and wellbeing impacts of all large planning applications should be assessed in line with draft London Plan objective GG3 'Creating a Healthy City'. The CCG suggested that health impact assessment is a useful tool to demonstrate that all potential impacts have been considered in an integrated and consistent way and to justify measures to mitigate negative impacts and maximise health benefits. The CCG also made comments relating to policies D2, D4, S2 and Annex 10. The CCG suggested one change to a project listed in the IDP. Lambeth council's responses to the CCG's comments are set out in the Regulation 22 Consultation Statement.

In February 2020, Lambeth notified the CCG and invited them to make representations on two SPDs – the Draft Affordable Workspace SPD and the Draft Design Code SPD.

Office of Rail and Road

2016/17

In November 2016, Lambeth notified the Office of Rail and Road (ORR) and asked them to provide comments on the draft SoWN Neighbourhood Plan. No comments were received.

Lambeth officers contacted ORR in December 2016 notifying them that Lambeth had produced a Draft Employment and Skills SPD and a Draft Development Viability SPD, and invited them to provide comments. No comments were received

2017/18

ORR were notified and invited to make representations on Lambeth's initial regulation 18 'issues' stage of the local plan review, and associated sustainability appraisal, in October 2017. In December 2017, ORR stated that they had no comments.

In April 2017, Lambeth notified and invited ORR to make comments on Lambeth's Revised Draft Development Viability SPD. No comments were received

In April 2017, Lambeth notified and invited ORR to make comments on an application for the designation of the Norwood Planning Assembly Neighbourhood Forum and Neighbourhood Area. No comments were received

In July 2017, Lambeth notified and invited ORR to make comments on an application for the designation of the Herne Hill Forum Neighbourhood Forum and Neighbourhood Area. No comments were received.

In October 2017, Lambeth notified ORR and invited them to make representations on the submission version SoWN Neighbourhood Plan. No comments were received.

In October 2017, Lambeth officers notified ORR that they had produced a draft Basements SPD and invited them to provide comments. No comments were received.

In November 2017, Lambeth notified and invited ORR to make comments on Lambeth's Revised Draft Employment and Skills SPD. No comments were received.

In March 2018, on behalf of KOVF, Lambeth notified ORR and invited them to make representations on the pre-submission draft Kennington Oval and Vauxhall (KOV) Neighbourhood Plan. No representations were received.

2018/19

ORR were notified and invited to make representations on Lambeth's regulation 18 consultation on its DRLLP, and associated Sustainability Appraisal, in autumn 2018. No comments were received.

In March 2018, Lambeth notified and invited ORR to provide comments on the Draft KOV Neighbourhood Plan. No comments were received.

In November 2018, Lambeth notified the ORR that the SoWN Neighbourhood Forum had submitted a draft of the SoWN Neighbourhood Plan to Lambeth and Southwark councils and invited ORR to make representations. No comments were received.

2019/20

In January 2020, Lambeth notified ORR and invited them to make representation on the pre-submission publication of the DRLLP PSV and associated Proposed Changes to the Policies Map (January 2020), and associated Sustainability Appraisal. No comments were received.

In February 2020, Lambeth notified ORR and invited them to make representations on two SPDs – the Draft Affordable Workspace SPD and the Draft Design Code SPD.

Transport for London

Lambeth continues to work in partnership with TfL, underpinned by joint funding of schemes within the borough to achieve shared goals. Monthly meetings take place between Lambeth officers from the highways, capital projects and transport teams regarding delivery local transport schemes focusing on walking, cycling, road safety and public realm improvements. Joint Delivery Group meetings happen each quarter to co-ordinate delivery of major changes to the road network such as Waterloo City Hub and Vauxhall Gyratory with attendance from senior officers, including directors. Ad-hoc meetings are also arranged to discuss improving accessibility on the tube and rail network and to discuss future improvements TfL are developing such as suburban rail metro-isation and the extension of the Bakerloo Line. Lambeth meets quarterly with the City Planning team to discuss development related transport issues. Regarding the DRLLP, discussions focused around provision of Blue Badge and cycle parking in relation to the emerging Draft London Plan standards.

2016/17

In November 2016, Lambeth notified TfL and asked them to provide comments on the draft SoWN Neighbourhood Plan. In January 2017, the TfL provided comments on the SoWN Plan, relating to policies on greenways, legibility and transport.

Lambeth officers contacted Transport for London (TfL) in December 2016 notifying them that Lambeth had produced a Draft Employment and Skills SPD and a Draft Development Viability SPD, and invited them to provide comments. In February 2018, TfL stated that they had no representations to make on the above SPD's.

2017/18

TfL were notified and invited to make representations on Lambeth's initial regulation 18 'issues' stage of the local plan review, and associated sustainability appraisal, in October 2017. In summary, TfL supported Lambeth's long term objective to promote sustainable travel and encourage walking, cycling and the use of public transport. TfL welcomed policies, along with future projects, to improve the safety and perception of sustainable travel. They outlined that it is essential the transport infrastructure/networks are developed and upgraded to accommodate the growth and additional demand. All of the TfL's comments on Lambeth's initial issues consultation are viewable in Lambeth's [Issues Consultation Report 2018](#).

In April 2017, Lambeth notified and invited TfL to make comments on Lambeth's Revised Draft Development Viability SPD. In May 2017, TfL provided comments - planning obligations are often secured to support site specific transport mitigation, as such it is requested that reference to Lambeth Local Plan policy T6 is inserted into paragraph 2.1. Within paragraph 2.2, reference should be made to s106 contributions being used where necessary to deliver increased public transport capacity. This includes increased bus capacity, which isn't classed as infrastructure and as a result CIL cannot be used for this purpose. Referencing this will remove any ambiguity at the decision making stage. Lambeth highlighted that the Revised Draft SPD relates to development viability and not the use of planning obligations more generally. The use of planning obligations in Lambeth is set out in Local Plan Policy D4. All of the TfL's comments on Lambeth's Revised Draft Development Viability SPD are viewable in Lambeth's [Development Viability SPD Consultation Statement 2017](#).

In April 2017, Lambeth notified and invited TfL to make comments on an application for the designation of the Norwood Planning Assembly Neighbourhood Forum and Neighbourhood Area. In May 2017, TfL provided comments stating that they have no objections to the establishment of the Neighbourhood Area promoted by the Norwood Planning Assembly. TfL encouraged the organisation to contact them should their plans or proposals impact on TfL's assets or operations through the development of their plan in order to assist in the development of policies.

In July 2017, Lambeth notified and invited TfL to make comments on an application for the designation of the Herne Hill Forum Neighbourhood Forum and Neighbourhood Area. In September 2017, TfL stated they had no objection to the establishment of the Neighbourhood Area promoted by the Norwood Planning Assembly, and highlighted that they offer guidance for those involved neighbourhood planning process and liaison with London Boroughs and neighbourhood forums.

In October 2017, Lambeth notified TfL and invited them to make representations on the submission version SoWN Neighbourhood Plan. No comments were received.

In October 2017, Lambeth officers notified TfL that they had produced a draft Basements SPD and invited them to provide comments. No comments were received.

In November 2017, Lambeth notified and invited TfL to make comments on Lambeth's Revised Draft Employment and Skills SPD. No comments were received.

In March 2018, on behalf of KOVF, Lambeth notified TfL and invited them to make representations on the pre-submission draft Kennington Oval and Vauxhall (KOV) Neighbourhood Plan. No representations were received.

2018/19

In order to develop priorities in the Transport Strategy Lambeth commissioned The Railway Consultancy to review plans and ideas for new rail infrastructure/service patterns that has been proposed. On behalf of Lambeth, The Railway Consultancy met with TfL in early summer 2018 to discuss TfL Metorisation plans and new east/west link so that services called at Clapham Junction and Brixton.

On 30 October 2018, Lambeth officers undertook a site visit with TfL at Clapham Junction to lobby for and discuss options for providing step-free access. Officers also e-mailed other relevant TOCs – Govia Thameslink and South Eastern regarding Access for All bids (The DfT advised that local authorities speak with TOCs to get stations included on the Access for All programme) in the autumn of 2018.

TfL were notified and invited to make representations on Lambeth's regulation 18 consultation on its DRLLP, and associated Sustainability Appraisal, in autumn 2018. TfL's representations and the council officer response can be found in [Lambeth's Draft Revised Lambeth Local Plan October 2018 Consultation Report 2019](#). In summary, TfL stated that generally, the revisions to the Lambeth Local Plan in transport terms are supported, being in broad accordance with draft London Plan (DLP) and Mayor's Transport Strategy (MTS) policy and direction of travel. TfL stated that Crossrail 2, which would relieve Clapham Junction to Waterloo trains, as well as the Victoria and Northern lines and the NR/LU interchange at Vauxhall, could be mentioned as a key transport investment. Lambeth inserted a reference to the project in DRLLP policy T4. TfL did not support a paragraph in the plan which sought flexibility in applying DLP cycle parking standards. Lambeth subsequently deleted this paragraph. Lambeth made extensive revisions to the DRLLP in response to TfL's comments.

In May 2018, TfL provided comments on the Draft KOV Neighbourhood Plan (after being notified and invited to by Lambeth in March), highlighting that it proposes to introduce a new protected view between the IS Building and the Oval Cricket Ground and commented that the proposed view does not have sufficient significance to its surroundings to warrant designation and that adequate supporting evidence has not been provided. TfL stated it is not feasible to restrict development to areas that do not experience persistently poor air quality, if targets for the provision of new homes are to be met. TfL supported the principle of residential-led redevelopment in the Oval Gasworks/Little Oval area with high density, medium rise building forms identified as appropriate.

In November 2018, Lambeth notified the TfL that the SoWN Neighbourhood Forum had submitted a draft of the SoWN Neighbourhood Plan to Lambeth and Southwark councils and invited TfL to make representations. Lambeth also notified the Mayor and invited them to make representations on an application to re-designate the SoWN Neighbourhood Forum. TfL offered no comments.

2019/20

In January 2020, Lambeth notified TfL and invited them to make representation on the pre-submission publication of the DRLLP PSV and associated Proposed Changes to the Policies Map (January 2020), and associated Sustainability Appraisal. In March 2020, TfL Spatial Planning provided representations on the draft Local Plan, as part of the Mayor's overall response on general conformity. TfL commented that they welcomed the council's commitment to addressing the climate emergency, the housing crisis and other health and environmental challenges. TfL strongly supported the council's focus on reducing car use and increasing walking, cycling and public transport use in achieving this. TfL strongly supported Lambeth's car parking policies. TfL made a number of further comments on specific areas. Lambeth officers have agreed a SCG with the Mayor, including a number of proposed amendments to plan wording to address TfL's comments made. This SCG has been submitted for examination and published as part of documents supporting submission.

In February 2020, Lambeth notified TfL and invited them to make representations on two SPDs – the Draft Affordable Workspace SPD and the Draft Design Code SPD.

The Marine Management Organisation

2016/17

Lambeth officers contacted Marine Management Organisation (MMO) in December 2016 notifying them that Lambeth had produced a Draft Employment and Skills SPD and a Draft Development Viability SPD, and invited them to provide comments. No comments were received.

In November 2016, Lambeth notified the MMO and asked him to provide comments on the pre-submission draft SoWN Neighbourhood Plan. No comments were received.

In December 2016 Lambeth officers notified and invited the MMO to make comments on its Draft Employment and Skills SPD and its Draft Development Viability SPD. No comments were received.

2017/18

The Marine Management Organisation were notified and invited to make representations on Lambeth's initial issues consultation, and associated sustainability appraisal, in autumn 2017. No comments were received.

In April 2017, Lambeth notified and invited the MMO to make comments on Lambeth's Revised Draft Development Viability SPD. No comments were received.

In April 2017, Lambeth notified and invited the MMO to make comments on an application for the designation of the Norwood Planning Assembly Neighbourhood Forum and Neighbourhood Area. No comments were received.

In July 2017, Lambeth notified and invited the MMO to make comments on an application for the designation of the Herne Hill Forum Neighbourhood Forum and Neighbourhood Area. No comments were received.

In October 2017, Lambeth notified the MMO and invited them to make representations on the submission version SoWN Neighbourhood Plan. No comments were received.

In October 2017, Lambeth officers notified the MMO that they had produced a draft Basements SPD and invited them to provide comments. No comments were received.

In November 2017, Lambeth notified and invited the MMO to make comments on Lambeth's Revised Draft Employment and Skills SPD. No comments were received.

In March 2018, on behalf of KOVF, Lambeth notified the MMO and invited them to make representations on the pre-submission draft Kennington Oval and Vauxhall (KOV) Neighbourhood Plan. No representations were received.

2018/19

The Marine Management Organisation were notified and invited to make representations on Lambeth's regulation 18 consultation on its DRLLP, and associated Sustainability Appraisal, in autumn 2018. No comments were received.

In November 2018, Lambeth notified the MMO that the SoWN Neighbourhood Forum had submitted a draft of the SoWN Neighbourhood Plan to Lambeth and Southwark councils and invited the MMO to make representations. Lambeth also notified the MMO and invited them to make representations on an application to re-designate the SoWN Neighbourhood Forum. No comments were received.

2019/20

In January 2020, as one of the 42 councils within the South East Marine Plan area, Lambeth was notified and invited to make representations on the MMO draft South East Marine Plan (SEMP). In January 2020, a Lambeth officer attended the draft SEMP information session. Lambeth advised the MMO in March 2020 that it had no comments on the draft SEMP.

In January 2020, Lambeth notified the MMO and invited them to make representation on the pre-submission publication of the DRLLP PSV and associated Proposed Changes to the Policies Map (January 2020), and associated Sustainability Appraisal. No comments were received.

In February 2020, Lambeth notified the MMO and invited them to make representations on two SPDs – the Draft Affordable Workspace SPD and the Draft Design Code SPD.

Local Enterprise Partnership

Lambeth has engaged closely with the LEAP and GLA over several years on the development of the proposed Affordable Workspace Policy ED2 in the Draft Revised Lambeth Local Plan. Officers have participated in the Mayor's Affordable Workspace Advisory Group, which has been an informative and useful forum that has provided intelligence and expertise to guide the policy development process.

Most recently, the council was invited to present to the Mayor's Cultural Leadership Board (which includes representatives of the LEAP) and the draft policy and approach was praised by the Board. Subsequently, the council has been asked to present to the LEAP Board in March 2020.

Throughout the development of the proposed Affordable Workspace Policy, Lambeth and GLA officers have worked together on establishing best practice and ensuring deliverability of the affordable workspace secured through the planning process.

2016/17

In November 2016, Lambeth notified the LEAP and asked him to provide comments on the pre-submission draft SoWN Neighbourhood Plan. No comments were received.

Lambeth officers contacted LEAP in December 2016 notifying them that Lambeth had produced a Draft Employment and Skills SPD and a Draft Development Viability SPD, and invited them to provide comments. No comments were received.

2017/18

The LEAP were notified and invited to make representations on Lambeth's initial issues consultation, and associated sustainability appraisal, in October 2017. No comments were received.

In April 2017, Lambeth notified and invited the LEAP to make comments on Lambeth's Revised Draft Development Viability SPD. No comments were received.

In April 2017, Lambeth notified and invited the LEAP to make comments on an application for the designation of the Norwood Planning Assembly Neighbourhood Forum and Neighbourhood Area. No comments were received.

In July 2017, Lambeth notified and invited the LEAP to make comments on an application for the designation of the Herne Hill Forum Neighbourhood Forum and Neighbourhood Area. No comments were received.

In October 2017, Lambeth notified the LEAP and invited them to make representations on the submission version SoWN Neighbourhood Plan. No comments were received.

In October 2017, Lambeth officers notified the LEAP that they had produced a draft Basements SPD and invited them to provide comments. No comments were received.

In November 2017, Lambeth notified and invited the LEAP to make comments on Lambeth's Revised Draft Employment and Skills SPD. No comments were received.

In March 2018, on behalf of KOVF, Lambeth notified the LEAP and invited them to make representations on the pre-submission draft Kennington Oval and Vauxhall (KOV) Neighbourhood Plan. No representations were received.

2018/19

The LEAP were notified and invited to make representations on Lambeth's regulation 18 consultation on its DRLLP in autumn 2018. No comments were received.

In November 2018, Lambeth notified the LEAP that the SoWN Neighbourhood Forum had submitted a draft of the SoWN Neighbourhood Plan to Lambeth and Southwark councils and invited the LEAP to make representations. Lambeth also notified the LEAP and invited them to make representations on an application to re-designate the SoWN Neighbourhood Forum. No comments were received.

2019/20

In January 2020, Lambeth notified the LEAP and invited them to make representation on the pre-submission publication of the DRLLP PSV and associated Proposed Changes to the Policies Map (January 2020), and associated Sustainability Appraisal. No comments were received.

In February 2020, Lambeth notified the LEAP and invited them to make representations on two SPDs – the Draft Affordable Workspace SPD and the Draft Design Code SPD.

5. Engagement with neighbouring boroughs since 2016

City of London

2016/17

No bi-lateral planning policy officer meetings during 2016/17. In September 2016, the City of London notified Lambeth of the first stage of public consultation on City Plan 2036 (Regulation 18 – Issues and Options). The City Corporation invited Lambeth to make representations. No representations were made by Lambeth.

In November 2016, Lambeth notified the City of London and asked them to provide comments on the pre-submission draft SoWN Neighbourhood Plan. No comments were received.

In December 2016 Lambeth officers notified and invited the City of London to make comments on its Draft Employment and Skills SPD and its Draft Development Viability SPD. No comments were received.

2017/18

Lambeth officers met with fellow offices from the City of London as part of a joint meeting with LB Southwark and LB Tower Hamlets in September 2017. Each authority ran through progress towards reviewing their Local Plans. Boroughs also ran through respective existing policies on a number of topics including affordable housing, offices and tall buildings. Other topics discussed include neighbourhood planning, waste and article 4 directions.

The City of London were notified and invited to make representations on Lambeth's initial issues consultation, and associated sustainability appraisal, in October 2017. The City provided comments in December 2017, stating that in relation to waste, any re-provision of waste sites outside Lambeth would need to be agreed through a pooling of the relevant London Plan waste apportionment targets so that London can meet its net-self-sufficiency target. Their comments are also viewable in Lambeth's [Issues Consultation Report 2018](#).

In April 2017, Lambeth notified and invited the City of London to make comments on Lambeth's Revised Draft Development Viability SPD. No comments were received.

In April 2017, Lambeth notified and invited the City of London to make comments on an application for the designation of the Norwood Planning Assembly Neighbourhood Forum and Neighbourhood Area. No comments were received.

In July 2017, Lambeth notified and invited the City of London to make comments on an application for the designation of the Herne Hill Forum Neighbourhood Forum and Neighbourhood Area. No comments were received.

In October 2017, Lambeth notified the City of London and invited them to make representations on the submission version SoWN Neighbourhood Plan. No comments were received.

In October 2017, Lambeth officers notified the City of London that they had produced a draft Basements SPD and invited them to provide comments. No comments were received.

In November 2017, Lambeth notified and invited the City of London to make comments on Lambeth's Revised Draft Employment and Skills SPD. No comments were received.

In March 2018, on behalf of KOVF, Lambeth notified the City of London and invited them to make representations on the pre-submission draft Kennington Oval and Vauxhall (KOV) Neighbourhood Plan. No representations were received.

2018/19

Officers in Lambeth's planning policy team met their counterparts from the City of London once during 2018/19. This took place on 5th December 2018 to discuss each authority's progress with their respective Local Plan reviews and any other development plan documents. The parties also discussed a proposed way forward on a Statement of Common Ground, and discussed the main strategic matters requiring cooperation, including housing, economy, waste, air quality and tall buildings. Other topics discussed included neighbourhood planning.

The City of London were notified and invited to make representations on Lambeth's regulation 18 consultation on its DRLLP, and associated Sustainability Appraisal, in October 2018. The City provided comments in December 2018, stating that they note and welcome Lambeth's proposed approach to increasing the quality of open space and green infrastructure in new developments and improving air quality. The City also welcomed the inclusion of the City of London's St Paul's Heights policy and London Views Management Framework (LVMF).

In November 2018, the City Corporation notified Lambeth of the second stage of public consultation on City Plan 2036 (Regulation 18). The City Corporation invited Lambeth to make representations. No comments were made by Lambeth.

In November 2018, Lambeth notified the City of London that the SoWN Neighbourhood Forum had submitted a draft of the SoWN Neighbourhood Plan to Lambeth and Southwark councils and invited the City to make representations. Lambeth also notified the City and invited them to make representations on an application to re-designate the SoWN Neighbourhood Forum. No comments were received.

2019/20

Officers in Lambeth's planning policy team met their counterparts from the City of London on 30th October 2019 to finalise the format of the proposed bi-lateral statement of common (SCG) and discuss its contents. Officers also discussed each authority's progress with their respective Local Plan reviews and any other development plan documents. In December 2019, a final SCG was agreed, signed and published [online](#).

In January 2020, Lambeth notified the City of London and invited them to make representation on the pre-submission publication of the DRLLP PSV and associated Proposed Changes to the Policies Map (January 2020), and associated Sustainability Appraisal. No comments were received.

In February 2020, Lambeth notified the City of London and invited them to make representations on two SPDs – the Draft Affordable Workspace SPD and the Draft Design Code SPD.

City of Westminster

2016/17

Lambeth planning policy officers met twice with officers from the City of Westminster in February 2017 the first of which also included a representative from Historic England. Digital modelling options for better understanding the setting of the Westminster World Heritage Site (WWHS) were analysed. It was agreed that there is merit in a joint Westminster / Lambeth approach to future WWHS setting work. This would be undertaken to evidence the future management plan and assessment of applications. Lambeth agreed to lead on the first step to seek quotes for an analysis of the impact of existing 'protected silhouettes' (in LVMF views) on constraining the height of potential backdrop development. Future work was envisaged to be potentially joint funded. Officers from each borough met again in February 2017 to discuss their corporate positions with regard to the ICOMOS Mission. It was agreed that Westminster would outline the factual background of their consultation responses on adjoining borough applications to date.

In November 2016, Lambeth notified the City of Westminster and asked them to provide comments on the pre-submission draft SoWN Neighbourhood Plan. No comments were received.

In December 2016 Lambeth officers notified and invited the City of Westminster to make comments on its Draft Employment and Skills SPD and its Draft Development Viability SPD. No comments were received.

2017/18

Lambeth officers met with officers from the City of Westminster twice – the first meeting took place in April 2017. Officers discussed findings of the emerging Westminster World Heritage Site setting study. All parties looked at the height constraints imposed on Lambeth, Westminster and Wandsworth by the existing LVMF protected silhouettes. Consequently, this identified areas without any current height limitation where potential harm could result from tall building construction. These areas comprise Westminster/ Camden / City of London fringe and Waterloo.

Officers met for a second time in September 2017. This meeting focussed on updated to Local plans including new policies on building heights and a potential resolution to WHS - new 'immediate setting' and 'approaches' protection layers. Boroughs also discussed potential housing figures derived from the new standard methodology as well as possible implication from part one of the brownfield land register. Existing work on and potential policy approaches to car parking, transport, flooding, hotels, affordable housing, short term lets and offices were also discussed. Respective approaches to dealing with waste were also discussed.

The City of Westminster were notified and invited to make representations on Lambeth's initial issues consultation, and associated sustainability appraisal, in October 2017. No comments were received.

In April 2017, Lambeth notified and invited the City of Westminster to make comments on Lambeth's Revised Draft Development Viability SPD. No comments were received.

In April 2017, Lambeth notified and invited the City of Westminster to make comments on an application for the designation of the Norwood Planning Assembly Neighbourhood Forum and Neighbourhood Area. No comments were received.

In July 2017, Lambeth notified and invited the City of Westminster to make comments on an application for the designation of the Herne Hill Forum Neighbourhood Forum and Neighbourhood Area. No comments were received.

In October 2017, Lambeth notified the City of Westminster and invited them to make representations on the submission version SoWN Neighbourhood Plan. No comments were received.

In October 2017, Lambeth officers notified the City of Westminster that they had produced a draft Basements SPD and invited them to provide comments. No comments were received.

In November 2017, Lambeth notified and invited the City of Westminster to make comments on Lambeth's Revised Draft Employment and Skills SPD. No comments were received.

In March 2018, on behalf of KOVF, Lambeth notified the City of Westminster and invited them to make representations on the pre-submission draft Kennington Oval and Vauxhall (KOV) Neighbourhood Plan. No representations were received.

2018/19

Officers in Lambeth's planning policy team met their counterparts from the City of Westminster once during 2018/19. This took place on 5th December 2018. Officers discussed each other's progress with their respective Local Plan reviews and the development of other development plan documents. Both parties also assessed a proposed way forward on a Statement of Common Ground. Westminster envisaged having one group statement which included all of their neighbouring boroughs, whereas Lambeth stated their intention to have one bi-lateral SCG with each neighbouring borough as issues are different with each borough. Officers also discussed the main strategic matters requiring cooperation, including respective approaches to the Westminster World Heritage site, transportation of Westminster waste through Lambeth, air quality, waste, the River Thames, housing, gypsies and travellers, neighbourhood planning and infrastructure (including CIL).

The City of Westminster were notified and invited to make representations on Lambeth's regulation 18 consultation on its DRLLP, and associated Sustainability Appraisal, in October 2018. No comments were received.

On 12th November 2018 Westminster notified Lambeth that it was consulting on its new draft City Plan under regulation 18. Lambeth submitted a response to this consultation on 21st December 2018 and focused comments of Westminster's proposed parking policy and Westminster waste-related traffic movements through Lambeth.

In November 2018, Lambeth notified the City of Westminster that the SoWN Neighbourhood Forum had submitted a draft of the SoWN Neighbourhood Plan to Lambeth and Southwark councils and invited the City of Westminster to make representations. Lambeth also notified the City of Westminster and invited them to make representations on an application to re-designate the SoWN Neighbourhood Forum. No comments were received.

2019/20

On 19th June 2019, the City of Westminster notified Lambeth that it was consulting on its new draft City Plan under Regulation 19. Lambeth did not submit a response to this consultation.

Officers in Lambeth's planning policy team met their counterparts from the City of Westminster once during 2019/20. This took place on 18th October 2019. This meeting focussed on agreeing a

final format for the SCG between the two parties and discussed strategic matters and wording to be included. Both parties agreed to have one bi-lateral statement. In December 2019, a final SCG was agreed, signed and published [online](#).

In January 2020, Lambeth notified the City of Westminster and invited them to make representation on the pre-submission publication of the DRLLP PSV and associated Proposed Changes to the Policies Map (January 2020), and associated Sustainability Appraisal. No comments were received.

In February 2020, Lambeth notified the City of Westminster and invited them to make representations on two SPDs – the Draft Affordable Workspace SPD and the Draft Design Code SPD.

London Borough of Bromley

2016/17

No bi-lateral planning policy officer meetings during 2016/17.

In November 2016, Lambeth was notified and invited to make comments on Bromley's Proposed Submission Draft Local Plan (the Draft Local Plan). No representations were made by Lambeth.

In November 2016, Lambeth notified Bromley and asked them to provide comments on the pre-submission draft SoWN Neighbourhood Plan. No comments were received.

In December 2016 Lambeth officers notified and invited Bromley to make comments on its Draft Employment and Skills SPD and its Draft Development Viability SPD. No comments were received.

2017/18

Bromley were notified and invited to make representations on Lambeth's initial issues consultation, and associated sustainability appraisal, in October 2017. No comments were received.

In April 2017, Lambeth notified and invited Bromley to make comments on Lambeth's Revised Draft Development Viability SPD. No comments were received.

In April 2017, Lambeth notified and invited Bromley to make comments on an application for the designation of the Norwood Planning Assembly Neighbourhood Forum and Neighbourhood Area. No comments were received.

In July 2017, Lambeth notified and invited Bromley to make comments on an application for the designation of the Herne Hill Forum Neighbourhood Forum and Neighbourhood Area. No comments were received.

In October 2017, Lambeth notified Bromley and invited them to make representations on the submission version SoWN Neighbourhood Plan. No comments were received.

In October 2017, Lambeth officers notified Bromley that they had produced a draft Basements SPD and invited them to provide comments. No comments were received.

In November 2017, Lambeth notified and invited Bromley to make comments on Lambeth's Revised Draft Employment and Skills SPD. No comments were received.

In March 2018, on behalf of KOVF, Lambeth notified Bromley and invited them to make representations on the pre-submission draft Kennington Oval and Vauxhall (KOV) Neighbourhood Plan. No representations were received.

2018/19

Officers in Lambeth's planning policy team met their counterparts from Bromley once during 2018/19. This took place on 29th November 2018. Officers discussed each other's progress with their respective Local Plan reviews and the development of other development plan documents. Both parties also assessed a proposed way forward on a Statement of Common Ground. Both parties agreed to have a bi-lateral SCG. Officers also discussed the main strategic matters requiring cooperation, including housing, gypsies and travellers, economy, waste, transport, air quality and infrastructure.

Bromley were notified and invited to make representations on Lambeth's regulation 18 consultation on its DRLLP, and associated Sustainability Appraisal, in October 2018. Bromley provided comments in December 2018, registering its objection to the replication of the Draft London Plan housing target for Lambeth, which will inevitably increase pressure on Outer London boroughs such as Bromley.

In November 2018, Lambeth notified Bromley that the SoWN Neighbourhood Forum had submitted a draft of the SoWN Neighbourhood Plan to Lambeth and Southwark councils and invited Bromley to make representations. Lambeth also notified Bromley and invited them to make representations on an application to re-designate the SoWN Neighbourhood Forum. No comments were received.

2019/20

Officers in Lambeth's planning policy team met their counterparts from Bromley once during 2019/20, as part of a tri-lateral meeting with LB Croydon, on 29th October 2019. Officers discuss each authority's progress with their respective Local Plan reviews and any other development plan documents. All parties agreed to take forward a tri-lateral SCG which would focus on cross boundary matter between Lambeth and Bromley and Lambeth and Croydon, however the Statement would address cross borough matters between Croydon and Bromley in respect of the shared boundary at Crystal Palace only.

In November 2019, officers from each authority subsequently agreed to have a separate statement between Lambeth and Bromley (and Lambeth and Croydon) which addressed the majority of cross boundary matters between those authorities. Therefore officers agreed the tri-lateral SCG would only focused on a few cross boundary strategic matters. In December 2019, the final [bi-lateral](#) and [tri-lateral](#) SCGs were agreed, signed and published online.

In January 2020, Lambeth notified Bromley and invited them to make representation on the pre-submission publication of the DRLLP PSV and associated Proposed Changes to the Policies Map (January 2020), and associated Sustainability Appraisal. In March 2020, Bromley provided comments - LBB considered that the draft revised Lambeth Local Plan is legally compliant and 'sound'. LBB stated they would welcome further engagement on the proposed Site Allocations DPD, specifically any sites which could have cross-boundary implications. Lambeth council's responses to LB Bromley's comments are set out in the Regulation 22 Consultation Statement.

In February 2020, Lambeth notified Bromley and invited them to make representations on two SPDs – the Draft Affordable Workspace SPD and the Draft Design Code SPD.

London Borough of Croydon

2016/17

No bi-lateral planning policy officer meetings during 2016/17.

In September 2016, Lambeth were notified and invited to make representation on the Croydon Local Plan: Strategic Policies – Partial Review (Proposed Submission) and the Croydon Local Plan: Detailed Policies and Proposals (Proposed Submission). No representations were made by Lambeth.

In November 2016, Lambeth notified Croydon and asked them to provide comments on the pre-submission draft SoWN Neighbourhood Plan. No comments were received.

In December 2016 Lambeth officers notified and invited Croydon to make comments on its Draft Employment and Skills SPD and its Draft Development Viability SPD. No comments were received.

2017/18

No bi-lateral planning policy officer meetings during 2017/18.

Croydon were notified and invited to make representations on Lambeth's initial issues consultation, and associated sustainability appraisal, in October 2017. No comments were received.

In April 2017, Lambeth notified and invited Croydon to make comments on Lambeth's Revised Draft Development Viability SPD. No comments were received.

In April 2017, Lambeth notified and invited Croydon to make comments on an application for the designation of the Norwood Planning Assembly Neighbourhood Forum and Neighbourhood Area. In May 2017, Croydon provided comments which stated that any development related to the NPA Neighbourhood Forum should not cause tension with policies DM41 Norbury and DM43 Crystal Palace and Upper Norwood in the Croydon Local Plan: Detailed Policies and Proposals (Proposed Submission) and Policy SP1: The Places of Croydon in the Croydon Local Plan: Strategic Policies.

In July 2017, Lambeth notified and invited Croydon to make comments on an application for the designation of the Herne Hill Forum Neighbourhood Forum and Neighbourhood Area. No comments were received.

In October 2017, Lambeth notified Croydon and invited them to make representations on the submission version SoWN Neighbourhood Plan. No comments were received.

In October 2017, Lambeth officers notified Croydon that they had produced a draft Basements SPD and invited them to provide comments. No comments were received.

In November 2017, Lambeth notified and invited Croydon to make comments on Lambeth's Revised Draft Employment and Skills SPD. No comments were received.

In March 2018, on behalf of KOVF, Lambeth notified Croydon and invited them to make representations on the pre-submission draft Kennington Oval and Vauxhall (KOV) Neighbourhood Plan. No representations were received.

2018/19

Officers in Lambeth's planning policy team met their counterparts from Croydon once during 2018/19, on 27th November 2018. Officers discussed each other's progress with their respective Local Plan reviews and timetables for other development plan documents. Both parties also assessed a proposed way forward on a Statement of Common Ground. Lambeth proposed to have a bi-lateral SCG. Officers also discussed the main strategic matters requiring cooperation, including housing, gypsies and travellers, economy, waste, transport, air quality and infrastructure.

Croydon were notified and invited to make representations on Lambeth's regulation 18 consultation on its DRLLP, and associated Sustainability Appraisal, in October 2018. Croydon provided comments in December 2018, noting that the DRLLP includes an increased housing target for Lambeth as set out in the emerging New London Plan (NLP) which Croydon supported. Croydon also supported policies encouraging flexible workspaces and the requirement for developments to include a proportion of affordable workspaces.

In November 2018, Lambeth notified Croydon that the SoWN Neighbourhood Forum had submitted a draft of the SoWN Neighbourhood Plan to Lambeth and Southwark councils and invited Croydon to make representations. Lambeth also notified Croydon and invited them to make representations on an application to re-designate the SoWN Neighbourhood Forum. No comments were received.

2019/20

Officers in Lambeth's planning policy team met their counterparts from the Croydon once during 2018/19, as part of a tri-lateral meeting with Bromley, on 29th October 2019. All parties agreed to take forward a tri-lateral SCG which would focus on cross boundary matter between Lambeth and Bromley and Lambeth and Croydon, however the Statement would address cross borough matters between Croydon and Bromley in respect of the shared boundary at Crystal Palace only.

In November 2019, officers from each authority subsequently agreed to have a separate statement between Lambeth and Croydon (and Lambeth and Bromley) which addressed the majority of cross boundary matters between those authorities. Therefore officers agreed the tri-lateral SCG would only focused on a few cross boundary strategic matters. In December 2019, the final [bi-lateral](#) and [tri-lateral](#) SCGs were agreed, signed and published online.

In January 2020, Lambeth were notified and invited to submit representations on the Croydon Local Plan review (Issues and Options) consultation. Lambeth submitted representations in February 2020 regarding transport, parking, affordable housing, views, environment and climate change, and Crystal Palace and Upper Norwood.

In January 2020, Lambeth notified Croydon and invited them to make representation on the pre-submission publication of the DRLLP PSV and associated Proposed Changes to the Policies Map (January 2020), and associated Sustainability Appraisal. In March 2020, Croydon provided a representation which acknowledged the signed statement of common ground and supported Lambeth's intention to meet and exceed its London Plan target. LBC also welcomed the DRLLP positively worded policy H8 as it will help to ensure that the specialist housing needs of Lambeth residents may be met within Lambeth. With regard to policy Q25 on Local Views, LBC noted that panoramas (v) and (vi) cover parts of Croydon and these are also included in the Croydon Local Plan 2018. The representation stated that Croydon would strongly object to any development in Croydon being constrained purely because it is contained in a panorama designated by the Draft Revised Lambeth Local Plan. Lambeth's response to this point is set out in the schedule in Appendix 2 of the Regulation 22 Statement of Consultation.

In February 2020, Lambeth notified Croydon and invited them to make representations on two SPDs – the Draft Affordable Workspace SPD and the Draft Design Code SPD.

London Borough of Merton

2016/17

No bi-lateral planning policy officer meetings during 2016/17. However, Merton coordinated a sub-regional meeting to discuss gypsies and travellers, which was attend by Lambeth officers.

In November 2016, Lambeth notified Merton and asked them to provide comments on the pre-submission draft SoWN Neighbourhood Plan. No comments were received.

In December 2016 Lambeth officers notified and invited Merton to make comments on its Draft Employment and Skills SPD and its Draft Development Viability SPD. No comments were received.

2017/18

No bi-lateral planning policy officer meetings during 2017/18.

Merton were notified and invited to make representations on Lambeth's initial issues consultation, and associated sustainability appraisal, in October 2017. No representations were received.

Lambeth were notified and invited to make representations on Merton's regulation 18 consultation on its New Local Plan in October 2017. In January 2018, Lambeth provided representations on the new Merton Local Plan.

In April 2017, Lambeth notified and invited Merton to make comments on Lambeth's Revised Draft Development Viability SPD. No comments were received.

In April 2017, Lambeth notified and invited Merton to make comments on an application for the designation of the Norwood Planning Assembly Neighbourhood Forum and Neighbourhood Area. No comments were received.

In July 2017, Lambeth notified and invited Merton to make comments on an application for the designation of the Herne Hill Forum Neighbourhood Forum and Neighbourhood Area. No comments were received.

In October 2017, Lambeth notified Merton and invited them to make representations on the submission version SoWN Neighbourhood Plan. No comments were received.

In October 2017, Lambeth officers notified Merton that they had produced a draft Basements SPD and invited them to provide comments. No comments were received.

In November 2017, Lambeth notified and invited Merton to make comments on Lambeth's Revised Draft Employment and Skills SPD. No comments were received.

In March 2018, on behalf of KOVF, Lambeth notified Merton and invited them to make representations on the pre-submission draft Kennington Oval and Vauxhall (KOV) Neighbourhood Plan. No representations were received.

2018/19

Officers in Lambeth's planning policy team met their counterparts from Merton once during 2018/19. This took place on 21st November 2018 to discuss each other's progress with their respective Local Plan reviews and any other development plan documents. Both parties also assessed a proposed way forward on a Statement of Common Ground, and agreed to work on a bi-lateral statement. Strategic cross boundary matters were also discussed including housing, gypsies and travellers, economy, waste, air quality, infrastructure, flood risk and protected views.

Merton were notified and invited to make representations on Lambeth's regulation 18 consultation on its DRLLP, and associated Sustainability Appraisal, in October 2018. No representations were received.

Lambeth were notified and invited to make representations on Merton's regulation 18 consultation on its New Local Plan in October 2018. In January 2019, Lambeth provided comments which primarily related to transport issues.

In November 2018, Lambeth notified Merton that the SoWN Neighbourhood Forum had submitted a draft of the SoWN Neighbourhood Plan to Lambeth and Southwark councils and invited Bromley to make representations. Lambeth also notified Bromley and invited them to make representations on an application to re-designate the SoWN Neighbourhood Forum. No comments were received.

2019/20

Officers in Lambeth's planning policy team met their counterparts from Merton once during 2019/20. This took place on 9th October 2019 to finalise the format of the proposed bi-lateral SCG and discuss its contents. In December 2019, a final SCG was agreed, signed and published [online](#).

In January 2020, Lambeth notified the Merton and invited them to make representation on the pre-submission publication of the DRLLP PSV and associated Proposed Changes to the Policies Map (January 2020), and associated Sustainability Appraisal. No representations were received.

In February 2020, Lambeth notified Merton and invited them to make representations on two SPDs – the Draft Affordable Workspace SPD and the Draft Design Code SPD.

London Borough of Southwark

2016/17

The two boroughs had ongoing engagement around the emerging draft SoWN Neighbourhood Plan which crosses the borough boundary between the two parties. This included coordination of comments on the pre-submission consultation draft plan.

In December 2016 Lambeth officers notified and invited Southwark to make comments on its Draft Employment and Skills SPD and its Draft Development Viability SPD. No comments were received.

2017/18

Lambeth officers met with LB Southwark officers in July 2017. Southwark explained proposals in their proposed Local Plan (Proposed Area Visions and Site Allocations). Lambeth officers provided initial comments and informed LBS that they would be making representations on draft Sites and Visions DPD and Gipsy Hill Paper. Southwark also gave an update on their new Health Action Plan coming forward for Old Kent Road and their new social regeneration agenda. Lambeth also provided an update with regards to their own Local Plan review. Development proposals for Crystal Palace

Park were also discussed as was the proposed neighbourhood planning area designation application at Herne Hill. LBL and LBS agreed to coordinate a response to HHNF and agreed a joint timetable.

The two boroughs had ongoing engagement around the emerging draft SoWN Neighbourhood Plan which crosses the borough boundary between the two parties. The two boroughs also had ongoing engagement around the designation of the Herne Hill neighbourhood forum and neighbourhood area which crosses the borough boundary between the two parties.

Southwark were notified and invited to make representations on Lambeth's initial issues consultation, and associated sustainability appraisal, in October 2017. No representations were received.

In April 2017, Lambeth notified and invited Southwark to make comments on Lambeth's Revised Draft Development Viability SPD. No comments were received.

In April 2017, Lambeth notified and invited Southwark to make comments on an application for the designation of the Norwood Planning Assembly Neighbourhood Forum and Neighbourhood Area. No comments were received.

In July 2017, Lambeth notified and invited Southwark to make comments on an application for the designation of the Herne Hill Forum Neighbourhood Forum and Neighbourhood Area. No comments were received.

In October 2017, Lambeth notified the Southwark and invited them to make representations on the submission version SoWN Neighbourhood Plan. No comments were received.

In October 2017, Lambeth officers notified Southwark that they had produced a draft Basements SPD and invited them to provide comments. No comments were received.

In November 2017, Lambeth notified and invited Southwark to make comments on Lambeth's Revised Draft Employment and Skills SPD. No comments were received.

In March 2018, on behalf of KOVF, Lambeth notified Southwark and invited them to make representations on the pre-submission draft Kennington Oval and Vauxhall (KOV) Neighbourhood Plan. No representations were received.

In December 2017, Lambeth were notified and invited to make representation on the New Southwark Plan Proposed Submission Version. Lambeth provided comments in December 2017. All of Lambeth's comments on the New Southwark Plan Proposed Submission Version are viewable in the [Statement of Common Ground between London Borough of Lambeth and London Borough of Southwark December 2019](#).

2018/19

Officers in Lambeth's planning policy team met their counterparts from Southwark once during 2018/19. The meeting took place on 25th June 2018 and assessed how both parties were progressing with their Local Plan reviews. Equalities Impact Assessment (EIA) were also discussed. Both parties also assessed a proposed way forward on a Statement of Common Ground, and agreed to work on a bi-lateral statement. Strategic cross boundary matters were also discussed including town centres, tall buildings, hotels, student accommodation, transport, CIL and MCIL. Other topics discussed included neighbourhood planning.

Southwark were notified and invited to make representations on Lambeth's regulation 18 consultation on its DRLLP in October 2018. No representations were received.

The two boroughs had ongoing engagement around the emerging draft SoWN Neighbourhood Plan as it crosses the borough boundary between the two parties. This included coordination of comments on the submission version of the draft neighbourhood plan and then the making of a joint decision to proceed to publication and examination in October 2018.

In January 2019, Southwark notified Lambeth that consultation on the New Southwark Plan Amended Policies Version would run from 25 January 2019 until 17 May 2019. Lambeth did not provide any further representations.

2019/20

Officers in Lambeth's planning policy team met their counterparts from Southwark once during 2019/20 on 18th October 2019. Officers discussed each other's progress with their respective Local Plan reviews and any other development plan documents. Both parties also assessed a proposed way forward on a Statement of Common Ground, and agreed to work on a bi-lateral statement. A previously shared draft SCG between the two parties was assessed and amendments were agreed. Other topics discussed included affordable workspace. In December 2019, a final SCG was agreed, signed and published [online](#).

The two boroughs had ongoing engagement around the emerging SoWN Neighbourhood Plan as it crosses the borough boundary between the two parties. In July 2019 both boroughs made the decision to accept all of the Examiner's recommendations to modify the draft neighbourhood plan. It was agreed that subject to these modifications, the draft neighbourhood plan should be sent to two referendums: one for residents and one for businesses.

The two boroughs continued to engage around the SoWN Neighbourhood Plan until it was formally made (adopted) by Lambeth in December 2019 (and by Southwark in early 2020). The Neighbourhood Plan was published on 15 January 2020.

In January 2020, Lambeth notified Southwark and invited them to make representation on the pre-submission publication of the DRLLP PSV and associated Proposed Changes to the Policies Map (January 2020), and associated Sustainability Appraisal. In March 2020, LBS provided comments – LBS stated they would encourage close working on the development of Lambeth's Local Views SPD, to reach agreement and ensure that the proposed further guidance has strategic alignment with Southwark's aims for sustainable development. LBS stated in particular, they would need to understand the geometric definition of protected local views to ensure development within Southwark is not hindered. The representation highlighted the possibility of a review of the Lambeth-Southwark Statement of Common Ground in accordance with the document's timeline for agreement, review and update. In April 2020, Southwark officers confirmed by email that no update to the Statement of Common Ground is needed at this stage, as the document remains up-to-date for both local plans. See the copy of the email included in Appendix 1 of this statement. Lambeth council's response to Southwark's comments is set out in the Regulation 22 consultation statement.

In February 2020, Lambeth notified Southwark and invited them to make representations on two SPDs – the Draft Affordable Workspace SPD and the Draft Design Code SPD.

London Borough of Wandsworth

2016/17

No bi-lateral planning policy officer meetings took place in 2016/17, however both authorities continued to work collaboratively through the Nine Elms Vauxhall Partnership which coordinates and drives forward the transformation of the VNEB OA. Co-chaired by the leaders of Wandsworth and Lambeth Council, it includes the area's main developers and landowners, the Mayor of London, Transport for London and the Greater London Authority. It is responsible for setting and delivering the strategic vision for the area.

In November 2016, Lambeth notified Wandsworth and asked them to provide comments on the pre-submission draft SoWN Neighbourhood Plan. No comments were received.

In December 2016 Lambeth officers notified and invited Wandsworth to make comments on its Draft Employment and Skills SPD and its Draft Development Viability SPD. No comments were received.

2017/18

Lambeth officers met with officers from Wandsworth in May 2017. LBW provided update on its Employment & Industry Local Plan Review: Regulation 19 consultation which included policies and site allocations, and gave an explanation of the previous two (Regulation 18) stages. Also provided SHLAA update. LBW confirmed that safeguarded wharves and waste policies were not part of this review and will only be amended to ensure consistency with the new policies. LBL provide an overview of employment policies, review of KIBAs and new Development Viability SPD. LBL also provided an overview of the upcoming issues consultation. Cross boundary town centres, gypsy and traveller provision and policy approaches to pubs were also discussed. Both boroughs to review the GLA's town centre health check report once it's published, particularly regarding the hierarchy conclusions of those centres in both boroughs. Borough confirm proposed memorandum of understanding between boroughs within the Western Riverside Waste Authorities area is in progress.

Officers from both boroughs met again in March 2018. Boroughs provide update on their respective Local Plan reviews and LBW Local Plan: Employment and Industry DPD (anticipate adoption in December). Councils to consider implications of planning for waste on their own in addition to joint working. Boroughs discuss town centre classifications as proposed in the draft London Plan. Officers discuss the government's definition and the Mayor's proposed definition of Gypsies and Travellers. Lambeth evidence relates to the government definition and so could be a potential issue if the Mayor's definition is eventually adopted.

Both authorities continue to work collaboratively through the Nine Elms Vauxhall Partnership which coordinates and drives forward the transformation of the VNEB OA. Co-chaired by the leaders of Wandsworth and Lambeth Council, it includes the area's main developers and landowners, the Mayor of London, Transport for London and the Greater London Authority. It is responsible for setting and delivering the strategic vision for the area, including the £1 billion infrastructure investment package.

Wandsworth were notified and invited to make representations on Lambeth's initial issues consultation, and associated sustainability appraisal, in October 2017. In December 2017, Wandsworth submitted comments to Lambeth as part of the Issues consultation. Of all of the questions answered, Wandsworth only disagreed with one which regarded the provision of short term lets, such as Airbnb, and their ability to meet demand for visitor accommodation. Wandsworth stated that the growing gap between demand and supply does not justify losing permanent housing.

They supported use of student halls out of term time. A full breakdown of the comments provided by Wandsworth is viewable in Lambeth's [Issues Consultation Report 2018](#).

In April 2017, Lambeth notified and invited Wandsworth to make comments on Lambeth's Revised Draft Development Viability SPD. No comments were received.

In April 2017, Lambeth notified and invited Wandsworth to make comments on an application for the designation of the Norwood Planning Assembly Neighbourhood Forum and Neighbourhood Area. No comments were received.

In July 2017, Lambeth notified and invited Wandsworth to make comments on an application for the designation of the Herne Hill Forum Neighbourhood Forum and Neighbourhood Area. No comments were received.

In October 2017, Lambeth notified Wandsworth and invited them to make representations on the submission version SoWN Neighbourhood Plan. No comments were received.

In October 2017, Lambeth officers notified Wandsworth that they had produced a draft Basements SPD and invited them to provide comments. No comments were received.

In November 2017, Lambeth notified and invited Wandsworth to make comments on Lambeth's Revised Draft Employment and Skills SPD. No comments were received.

In March 2018, on behalf of KOVF, Lambeth notified Wandsworth and invited them to make representations on the pre-submission draft Kennington Oval and Vauxhall (KOV) Neighbourhood Plan. No representations were received.

2018/19

Officers in Lambeth's planning policy team met their counterparts from Wandsworth once during 2018/19. The meeting took place on 21st November 2018. Officers from both parties explained how their respective Local Plan reviews were progressing and provided updated on any other forthcoming development plan documents. Both parties also assessed a proposed way forward on a Statement of Common Ground, and agreed to work on a bi-lateral statement. Strategic cross boundary matters were also discussed including green infrastructure, housing, gypsies and travellers, economy, tall buildings and protected views, transport, air quality, waste, and infrastructure.

Wandsworth were notified and invited to make representations on Lambeth's regulation 18 consultation on its DRLLP, and associated Sustainability Appraisal, in October 2018. In December 2018, LB Wandsworth provided comments on the Draft Revised Lambeth Local Plan 2018 and associated Sustainability Appraisal. Wandsworth comments and Lambeth council officer responses are viewable in the [Lambeth's Draft Revised Lambeth Local Plan October 2018 Consultation Report 2019](#).

In November 2018, Lambeth notified Wandsworth that the SoWN Neighbourhood Forum had submitted a draft of the SoWN Neighbourhood Plan to Lambeth and Southwark councils and invited Wandsworth to make representations. Lambeth also notified Wandsworth and invited them to make representations on an application to re-designate the SoWN Neighbourhood Forum. No comments were received.

In December 2018, Wandsworth invited Lambeth and notified them to make representations on its Local Plan Review – Issues document. Lambeth provided comments in February 2019 relating to town centre uses outside of town centres and potential solutions to cross border transport issues.

Both authorities continue to work collaboratively through the Nine Elms Vauxhall Partnership which coordinates and drives forward the transformation of the VNEB OA. Co-chaired by the leaders of Wandsworth and Lambeth Council, it includes the area's main developers and landowners, the Mayor of London, Transport for London and the Greater London Authority. It is responsible for setting and delivering the strategic vision for the area, including the £1 billion infrastructure investment package.

2019/20

Officers from both parties met on 30th October 2019 to provide an update on their respective Local Plan reviews, finalise the format of the proposed bi-lateral SCG and discuss its contents. In December 2019, a final SCG was agreed, signed and published [online](#).

In January 2020, Lambeth notified Wandsworth and invited them to make representation on the pre-submission publication of the DRLLP PSV and associated Proposed Changes to the Policies Map (January 2020), and associated Sustainability Appraisal. No representations were received.

In February 2020, Lambeth notified NE and invited them to make representations on two SPDs – the Draft Affordable Workspace SPD and the Draft Design Code SPD.

6. Engagement with Waste planning authorities

Lambeth lies with the 'Western Riverside' area of London and is one of five authorities that make up the Western Riverside Waste Authority (WRWA) responsible for disposal of household waste. Duty to co-operate activity with regard to waste movements outside Lambeth, including a full account of the engagement on waste planning between the WRWA five authorities, is outlined in the [Lambeth Waste Evidence Base April 2020 update](#).

In June 2019, Lambeth wrote to all recipients of significant waste exports from the borough and included draft statements of common ground (SCG) for each waste planning area. The Waste SCG set out the thresholds to indicate 'strategic' movements of waste, the amount, type and destination of waste which has been exported over the last five years to the authority's area, and if there are any known reasons why similar movements of waste cannot continue over Lambeth's plan period.

If any constraints are identified (such as the closure of facilities), the parties agree that the destination of waste is largely dependent on market forces and exports will continue to go the most suitable facility. The focus is on landfill sites because landfill capacity in the wider south east is declining and limited new landfill sites are being put forward by waste operators.

The SCG commits both parties to monitoring waste movements through Authority Monitoring Reports and engaging again if these change significantly from the current trend.

In December 2019, a set of Statements was agreed, signed and [published](#) between Lambeth and waste planning authorities that receive 'strategic' amounts of waste exports from Lambeth. Three of these statements (between Lambeth and Bexley, Lambeth and Greenwich and Lambeth and Newham) were agreed, signed and published after this date, in early 2020 ahead of submission of the DRLLP PSV for examination (see below for publication date). A 'strategic' amount of waste is that

over certain thresholds which have been agreed by waste planning authorities across the wider south east. The SCGs agreed by Lambeth with planning authorities that receive 'strategic' amounts of waste exports from Lambeth are as follows:

- [Statement of Common Ground between London Borough of Lambeth and London Borough of Bexley covering strategic waste matters \(January 2020\)](#)
- [Statement of Common Ground between London Borough of Lambeth and Cambridgeshire County Council and Peterborough City Council](#)
- [Statement of Common Ground between London Borough of Lambeth and Essex County Council covering strategic waste matters](#)
- [Statement of Common Ground between London Borough of Lambeth and Royal Borough of Greenwich covering strategic waste matters \(February 2020\)](#)
- [Statement of Common Ground between London Borough of Lambeth and London Borough of Havering covering strategic waste matters](#)
- [Statement of Common Ground between London Borough of Lambeth and Hertfordshire County Council covering strategic waste matters](#)
- [Statement of Common Ground between London Borough of Lambeth and London Borough of Hillingdon covering strategic waste matters](#)
- [Statement of Common Ground between London Borough of Lambeth and Kent County Council covering strategic waste matters](#)
- [Statement of Common Ground between London Borough of Lambeth and Medway Council covering strategic waste matters](#)
- [Statement of Common Ground between London Borough of Lambeth and Old Oak and Park Royal Development Corporation covering strategic waste matters](#)
- [Statement of Common Ground between London Borough of Lambeth and London Borough of Newham covering strategic waste matters \(April 2020\)](#)
- [Statement of Common Ground between London Borough of Lambeth and Reading Borough Council covering strategic waste matters](#)
- [Statement of Common Ground between London Borough of Lambeth and the South London Waste Plan Boroughs covering strategic waste matters](#)
- [Statement of Common Ground between London Borough of Lambeth and Surrey County Council covering strategic waste matters](#)
- [Statement of Common Ground between London Borough of Lambeth and Thurrock Council covering strategic waste matters](#)

Appendix 1: Email sent from LB Southwark to LB Lambeth regarding Southwark's representation on the Draft revised Lambeth Local Plan Proposed Submission Version

From: Seymour, Juliet [<mailto:juliet.seymour@southwark.gov.uk>]

Sent: 23 April 2020 15:27

To: Catherine Carpenter <CCarpenter@lambeth.gov.uk>

Cc: Gozo, Michael <Michael.Gozo@southwark.gov.uk>


Subject: SOCG

Dear Catherine,

LB Southwark submitted a representation on the 13th March 2020 for the Draft revised Lambeth Local Plan Proposed Submission Version. The representation highlighted the possibility of a review of the Lambeth-Southwark Statement of Common Ground in accordance with the document's timeline for agreement, review and update.

We agree that no update to the Statement of Common Ground is needed at this stage, as the document remains up-to-date for both local plans.

Kind regards,

A handwritten signature in cursive script that reads "Juliet Seymour".

Juliet Seymour BSc(HONS) MA MSc MBA MRTPI

Planning Policy Manager | Planning and Regeneration Division

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