

Statement of Common Ground between  
London Borough of Lambeth and London  
Borough of Bromley

December 2019

## 1. Executive summary

This Statement of Common Ground (SCG) has been prepared to demonstrate that Lambeth's Draft Revised Lambeth Local Plan – Proposed Submission Version January 2020 (DRLLP PSV 2020) is 'based on effective joint working on cross-boundary strategic matters', in accordance with the requirements of paragraph 35 of the National Planning Policy Framework (NPPF). This SCG focuses on strategic cross-boundary matters being addressed and progress in cooperating to address them.

Updates to this document will be agreed as matters progress and agreement is reached on any outstanding issues. It therefore includes details on mechanisms for review and updating.

Lambeth's AMRs also provide further details of how the DRLLP PSV 2020 has been informed by ongoing engagement with key partners, including those that are not party to this Statement of Common Ground.

## 2. Parties involved

- London Borough of Lambeth
- London Borough of Bromley

The Bromley Local Plan was adopted in January 2019.

Please note that this Statement addresses the majority of cross boundary matters between Lambeth and Bromley. However in respect of (i) the shared town centre boundary at Upper Norwood/Crystal Palace, (ii) Strategic Outer London Development Centres, (iii) transport, (iv) air quality and (v) green infrastructure, a separate tri-lateral Statement between Lambeth, Bromley and Croydon addresses these five strategic cross boundary matters.

## 3. Strategic geography

This section sets out the factual position regarding cross-boundary strategic matters.

### *The London Plan*

The London Plan is the spatial development strategy for London, produced by the Greater London Authority on behalf of the Mayor of London. Every London borough local plan must be in general conformity with the London Plan. Together, the policies in the London Plan and in each borough's Local Plan constitute the statutory local development plan for that borough, along with any neighbourhood development plans once made.

It is worth noting that in a London context, collaboration on many strategic issues that go beyond borough boundaries (e.g. distribution of housing targets, identification of major areas of growth etc.) are largely addressed through the London Plan.

The adopted London Plan (2016) is currently subject to a review and the Draft London Plan is undergoing examination at the time of writing. It is expected the replacement London Plan will be published (adopted) in early 2020.

### *Transport for London*

Transport for London (TfL) is the integrated transport authority responsible for implementing the Mayor's Transport Strategy, which covers three key elements - healthy streets and healthy people, a good public transport experience and new homes and new jobs. The boroughs are required to work with TfL to support implementation of the Mayor's Transport Strategy.

TfL runs the day-to-day operation of the capital's public transport network (London Buses, London Underground, London Overground, Docklands Light Railway, TfL Rail and London Trams). Network Rail own, operate and develop London's railway infrastructure.

TfL also manages London's main roads (the Transport for London Road Network or TLRN). The London boroughs are responsible for all the other roads within their boundaries (other than the national motorway network, which is managed by Highways England).

#### *The London Enterprise Panel*

The London Enterprise Panel<sup>1</sup> (LEP) is the local enterprise partnership for London and is governed by the Mayor of London. It is the body through which the Mayor of London works with boroughs, business and TfL to take a strategic view of the regeneration, employment and skills agenda for London. Boroughs have historically engaged with the Mayor of London / GLA rather than directly with the LEP on relevant strategic planning matters. All parties have effectively co-operated with the GLA regarding the development of its evidence base particularly in relation to business needs and likely changes in the market.

#### *All London Green Grid*

The 'All London Green Grid partnership' is recognised by DEFRA as the Local Nature Partnership for London. The partnership does not yet have a governance structure that allows it to respond on matters of local plan consultations.

#### *Thames Water*

Thames Water is the statutory water and sewerage undertaker for the area and is hence a "specific consultation body" in accordance with the Town & Country Planning (Local Development) Regulations 2012. From the 1st April 2018 all network reinforcement work required to support development will be delivered by Thames Water and funded through the Infrastructure Charge applied to each property connected to the water and wastewater networks. The Infrastructure Charge will also cover all modelling and design work required to deliver any necessary upgrades. The planning system will still play a key role in assisting that development does not outpace the delivery of any necessary infrastructure provision. It will be essential that all development is aligned with any necessary water and sewerage infrastructure upgrades required to avoid any adverse impacts such as sewer flooding, pollution of land or watercourses and impacts of low/no water pressure. In line with DRLLP PSV 2020 policy EN4, Thames Water will, where appropriate, request phasing conditions are used to ensure that any new development or phase of development is not occupied until any necessary upgrades have been completed.

#### **LB Lambeth**

Lambeth is an inner London borough with a northern boundary on the River Thames. It is situated mainly between the boroughs of Wandsworth and Southwark and covers an area of approximately

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<sup>1</sup> Also known as the London Economic Action Partnership

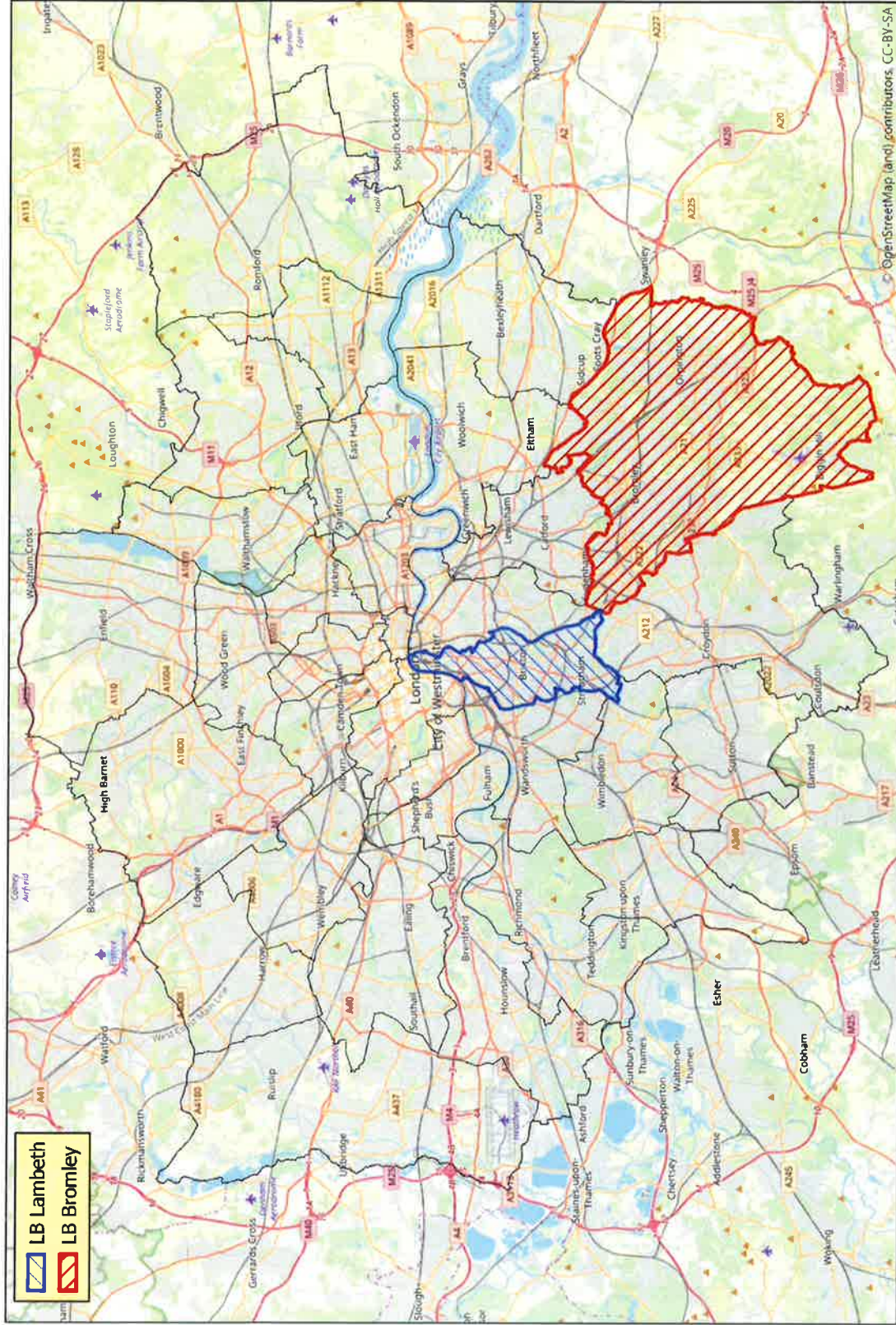
ten and a half square miles. Lambeth is surrounded by seven other London Boroughs - LB Southwark; LB Bromley; LB Croydon; LB Merton; LB Wandsworth; City of Westminster and City of London.

**LB Bromley**

Bromley is an outer London borough, situated in south east London. It is surrounded by Croydon, to the west, and Lewisham, Greenwich and Bexley to the north. It has a short border with Lambeth which it bounds at its North West, to the south eastern point of Lambeth.

This Statement includes the whole of the LB Lambeth and the whole of LB Bromley.

Map 1 – Boroughs involved in this Statement

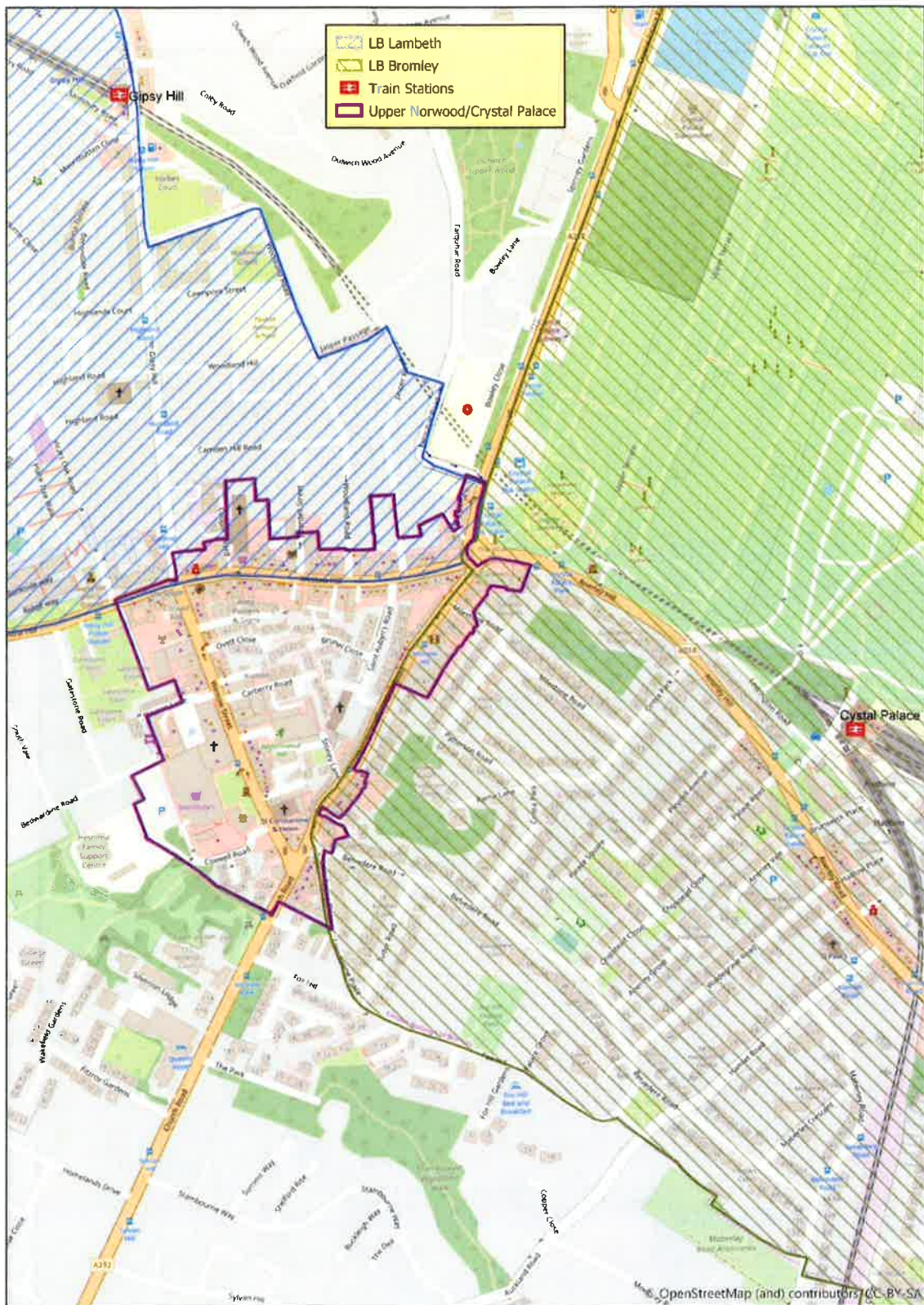


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Map 2 – Border between Lambeth and Bromley and key policy designations



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## Neighbourhood planning

There are no designated neighbourhood planning areas spanning the borough boundary or close to the borough boundary between the two parties.

## Flood risk

The Thames Barrier is managed and maintained by the Environment Agency and protects 125 square kilometres of central London from flooding caused by tidal surges. This includes the protection of just under 29,000 properties in Lambeth. The Thames tidal defences also include tidal walls and embankments along the banks of the River. Should they fail or become breached, the areas most at risk of flooding would be in the north of Lambeth, but this could also impact on the surrounding neighbourhoods. The Environment Agency holds tidal breach modelling. This is also detailed within Lambeth's SFRA Tidal Breach addendum.

### *Critical Drainage Areas*

A Critical Drainage Area is a discrete geographic area (usually a hydrological catchment) where multiple and interlinked sources of flood risk (surface water, groundwater, sewer, main river and/or tidal) cause flooding in one or more Local Flood Risk Zones during severe weather thereby affecting people, property or local infrastructure.



Map 3 - Critical Drainage Areas in Lambeth

Critical Drainage Areas spanning the borough boundary between the Lambeth and Bromley:

None.

### **The provision of energy (including heat)**

The Draft London Plan (DLP) states that boroughs should engage at an early stage with relevant energy companies and bodies to establish the future energy and infrastructure requirements arising from large-scale development proposals such as Opportunity Areas, Town Centres, other growth areas or clusters of significant new development (see DLP policy SI3). It also states that development plans should identify the need for, and suitable sites for, any necessary energy infrastructure requirements including energy centres, energy storage and upgrades to existing infrastructure. Furthermore boroughs should identify existing heating and cooling networks, identify proposed locations for future heating and cooling networks and identify opportunities for expanding and inter-connecting existing networks as well as establishing new networks.

The London Heat Map is an online tool, developed by the Mayor, used to find opportunities for decentralised energy (DE) projects in London. The Mayor has identified Heat Network Priority Areas, which can be found on the London Heat Map website (see DRLLP policy EN3). These identify where in London the heat density is sufficient for heat networks to provide a competitive solution for supplying heat to buildings and consumers.

No existing or proposed heat networks cross the borough boundary between Lambeth and Bromley.

### **Strategic and local views**

Strategic views:

- No strategic views cross the borough boundary between Lambeth and Bromley.

Local views:

- No local views cross the borough boundary between Lambeth and Bromley.

### **Heritage, design and conservation**

Conservation areas in Lambeth adjoining Bromley:

- Westow Hill (CA23)

Conservation areas in Bromley adjoining Lambeth:

- Crystal Palace Park

Crystal Palace Park is entirely within the borough of Bromley but borders Lambeth. It is designated Metropolitan Open Land and grade II listed park (heritage asset).

Archaeological priority areas in Lambeth adjoining Bromley:

None.

Archaeological priority areas in Bromley adjoining Lambeth:

- Crystal Palace Park

Historic parks and gardens in Lambeth adjoining Bromley:

- None

Historic parks and gardens in Bromley adjoining Lambeth:

- Crystal Palace Park



## 4. Strategic matters:

This section sets out where agreement has or has not been reached on cross-border strategic matters.

### 4.1 Neighbourhood Planning

There are no designated neighbourhood planning areas spanning the borough boundary between the two parties.

### 4.2 Housing

#### *4.2a. Overall housing need and supply*

Housing need is a strategic issue dealt with at the regional level in London by the Mayor in the London Plan, with need from within the London Housing Market Area distributed on the basis of capacity within each borough.

Through their own local plans, authorities must plan to meet or exceed their London Plan target to ensure they are in general conformity with the London Plan.

Lambeth's position in its Draft Revised Lambeth Local Plan PSV 2020 is that it is able to meet its own Draft London Plan housing target within its administrative boundary.

As set out in the Bromley Local Plan 2019, Bromley can meet or exceed the total numerical housing target assigned to it by the Mayor of London in the London Plan (2016), within the confines of its own administrative boundary.

#### *4.2b. Affordable housing*

The London Plan and borough level Local Plans together set out the levels and types of affordable housing provision required.

- In terms of affordable housing, both parties **will address** the Mayor's London Plan affordable housing policy, in light of local circumstances, in their Local Plans.

#### *Gypsies and Travellers*

Lambeth has a need for 3 pitches for gypsies and travellers between 2019/20 and 2034/35, which equates to one pitch every five years. There is no identified need for plots for travelling showpeople in the borough. Lambeth will meet the needs of Lambeth's gypsy and traveller community over this period by safeguarding the existing gypsy and traveller site in Streatham Vale (Lonesome depot) and managing churn in vacant pitches on this site to meet identified future need.

LB Bromley adopted their Local Plan in January 2019 which allocates sites sufficient to meet its need for pitches within its borders over the plan period to 2030.

- Both parties **agree** that on this basis no borough has unmet need for gypsy and travellers accommodation

#### 4.3 Health

The six south east London CCGs (Bexley, Bromley, Greenwich, Lambeth, Lewisham and Southwark) received approval to merge from 1 April 2020. This merger will enable the new South East London CCG to work in greater partnership with local authorities in each borough; and commission services for those patient pathways that span the entire south east London integrated care system. Our Healthier South East London programme (OHSEL) is the body responsible for the delivering the Sustainability & Transformation Plans (STPs) for the six boroughs.

Health infrastructure planning in Lambeth reflects the priorities of the Lambeth Clinical Commissioning Group - this has had regard to and acknowledges potential movement of patients across the border between the two boroughs.

Health infrastructure planning in Bromley currently reflects the priorities of the Bromley Clinical Commissioning Group. Going forward the 8 Primary Care Networks within the London Borough of Bromley will work together as 'One Bromley' and across borough boundaries within the umbrella South East London CCG, acknowledging the cross border provision of health services.

- Bromley and Lambeth **agree** to work collaboratively under the OHSEL programme.

#### 4.4 Education

All parties have a school place planning teams who seek to ensure that projected levels of demand for both primary school and secondary school places are met. Each party has undertaken a school place planning exercise which has had regard to cross-border movement of pupils between the two boroughs. The findings are reflected in the Lambeth Infrastructure Delivery Plan 2019 and the Bromley Local Plan (2019) Appendix 10.12 Infrastructure Delivery Plan Schedule.

- Both parties acknowledge that there is likely to be cross border movements of school pupils between each borough but **agree** there are no known planning reasons why these movements cannot continue.
- Both parties agree to work collaboratively to meet the need identified within their own boroughs for school places, acknowledging the impact of cross borough movements.

#### 4.5 Telecommunications

- Both parties **agree** to work collaboratively on the delivery of digital connectivity infrastructure where there are cross-border implications

#### 4.6 Security

- Both parties **agree** to work collaboratively on counter terrorism measures such as hostile vehicle mitigation as required.

#### 4.7 Waste management

Each Waste Planning Authority is expected to plan for their identified waste needs, including planning to meet London Plan apportionment targets. Lambeth is planning for net self-sufficiency for LACW, C&I and C&D waste and a target of 95% beneficial use of excavation waste. Net self-sufficiency means providing enough waste management capacity to manage the equivalent of 100% of these waste streams generated in Lambeth, while recognising that some imports and exports will continue. This includes meeting the London Plan apportionment targets for the borough. Lambeth is planning for its identified waste needs by safeguarding existing waste sites and identifying sufficient land to provide opportunities to meet the waste management capacity gaps for the borough.

LB Bromley is part of the South East London sub-regional grouping of boroughs for waste planning matters. The Southeast London joint waste Planning Group (SELJWG), comprising Bromley, Bexley, Greenwich Lewisham and City of London, produces the South East London Waste Technical Paper in order to demonstrate how waste apportionment targets set by the London Plan (2016) will be met in collaboration.

There are no significant waste movements between Lambeth and Bromley as set out in the Lambeth Waste Evidence Base 2019.

- Both parties **agree** to plan separately to meet their respective Local Plan waste apportionments following the approach described above.

#### 4.8 Water supply, wastewater

- Both parties **agree** to support Thames Water's approach to planning for water and waste water infrastructure.

#### 4.9 Flood risk

Flood risk in each Flood risk in each borough is addressed through respective Strategic Flood Risk Assessment (SFRAs) and Local Plan policies. SFRAs assess the risk from all sources of flooding, this includes fluvial, tidal, surface water and foul water sources.

Each council is statutorily required to produce a Local Flood Risk Management Strategy (LFRMS) for their respective borough which details how they assess and will manage Local Flood Risk within their administrative boundary. LFRMSs require cross boundary partnership working to achieve the ultimate outcome of reducing Local Flood Risk. As part of the partnership working, Lambeth's and Bromley's Flood Risk Officers meet with each neighbouring council at quarterly Flood Group meetings, which form part of the reporting mechanism for the Thames Regional Flood and Coastal Committee. These meetings assist in collaborative working and also provide a platform for sharing knowledge and common issues in flood risk management.

Bromley, together with Bexley, Lewisham, and Royal Greenwich Councils have come together as the South East London Flood Risk Partnership to develop the South East London Local Flood Risk Management Strategy.

- Each party has had regard to each other's flood risk policies and **agree** that they are complimentary.

#### 4.10 Provision of energy (including heat)

The London Plan (2016) requires major development proposals to include detailed energy assessments to demonstrate how targets for carbon dioxide emissions reduction are to be met.

- Lambeth proposes to follow the Draft London Plan policy approach to the provision of energy in relation to new development (see DRLLP PSV 2020 policy EN3).
- Bromley's recently adopted Local Plan (2019) follows the London Plan (2016) policy approach to the provision of energy in relation to new development.

#### 4.11 Planning measures to address climate change mitigation and adaptation

Lambeth Council declared a Climate Emergency in January 2019. Lambeth has set itself a target to achieve net zero carbon for council operations by 2030. In July 2019, Lambeth published a corporate carbon reduction plan which sets out initial actions to achieve this target, to be reviewed annually to ensure Lambeth is on track. Lambeth are also developing a wider Lambeth climate change response plan, which will be published in 2020. In the next eleven months Lambeth plans to engage widely, starting with a Citizens' Assembly early next year, to raise awareness, gather evidence and seek to build consensus around Lambeth's climate change response and the resulting action plan.

Bromley has confirmed its intention that direct Council activities will have net zero emissions within ten years (2029). The Bromley Local Plan (2019) aligns with the measures set out in the London Plan 2016.

The sections above relating to transport, waste, flood risk, provision of energy, green infrastructure and air quality are all relevant to mitigating and adapting to climate change.

- The DRLLP PSV 2020 follows the approach outlined in the Draft London Plan for zero carbon developments (see DLP policy SI2) and aligns with the Mayor's urban greening objectives (including adopting an urban greening factor – see DLP policy G5).
- The Bromley Local Plan 2019 follows the approach for zero carbon developments outlined in the London Plan 2016

#### 4.12 Strategic and local views, and heritage, design and conservation

##### *Strategic and local Views*

- Both parties **agree** to have regard to cross border local views when determining applications, and consult each other on any proposals that could impact on these views.

##### *Heritage, design and conservation*



Bromley has over 2,600 Tree preservation orders as well as trees protected within its 45 conservation areas. There are 800 Statutory Listed buildings and 1,000 Locally Listed buildings. Bromley has significant areas designated as Sites of Archaeological interest, including the Crystal Palace Park bordering Southwark

- Both parties **agree** to have regard to the setting of heritage, design and conservation designations adjoining the borough boundary in the neighbouring borough when determining applications, and consult each other on any proposals that could impact on these designations.

#### 4.13 Heritage and Cultural infrastructure

Lambeth has developed a cultural evidence base (*Visitor attractions, leisure, arts and cultural uses in Lambeth 2019*) which sets out existing cultural uses in the borough. This has been used to inform DRLLP policy ED13 which seeks to follow the Draft London Plan approach to protecting and enhancing cultural infrastructure (see DLP policy HC5).

Bromley's recently adopted Local Plan (2019) includes policies to meet its vision that people enjoy rewarding lives with a range of services and that Bromley Town Centre is recognised for its cultural and leisure facilities and high quality shopping experience.

## 5 Governance arrangements

This statement has been informed by on-going engagement between the parties – as evidenced by the main body of the statement explaining joint working and the schedule of engagement between the parties in Appendix 1.

This statement of common ground is a live document and will be reviewed on a regular basis, informed by continued communication between the parties through meetings, statutory consultation at key plan making stages and electronic communication.

Key stages of each borough's plan making process (set out in Table 1) will be triggers for the SCG to be reviewed, however strategic matters will be dealt with on an on-going basis in-between formal reviews of the SCG.

#### Timetable for agreement, review and update

Local authority	Present plan adoption	Proposed plan review start date	Reg 18 date	Anticipated Reg 19 date	Anticipated submission date
Lambeth	September 2015	October 2017	October 2018	January 2020	Spring 2020
Bromley	January 2019	N/A	N/A	N/A	N/A

*Table 1: Plan review, update and submission dates*

Ongoing collaboration between the parties will continue through regular meetings and through attendance at group meetings where cross boundary issues are discussed.

## 6 Signatories

Both signatories agree that this statement is an accurate representation of areas of agreement and disagreement between the two parties.

Signed: Matthew Bennett

Name: Cllr Matthew Bennett

Position: Cabinet Member for Planning,  
Investment & New Homes

**London Borough of Lambeth**

Date 08/01/2020

Signed: Alexa Michael

Name: Cllr Alexa Michael

Position: Development Control Committee  
Chairman

**London Borough of Bromley**

Date 2nd December 2019

## **Appendix 1 - Schedule of engagement between the parties**

Officer-level meetings to discuss strategic cross border planning matters under the duty to co-operate and to develop this statement of common ground took place on:

- 13th November 2015
- 21st November 2018
- 29th October 2019 (with Croydon)

Flood officer meetings:

Lambeth's and Bromley's Flood Officers meet at quarterly Flood Group meetings, which form part of the reporting mechanism for the Thames Regional Flood and Coastal Committee. These meetings assist in collaborative working and also provide a platform for sharing knowledge and common issues in flood risk management.

All London Borough planning officer meetings (Association of London Borough Planning Officers):

- 13<sup>th</sup> Jan 2016
- 21<sup>st</sup> June 2016
- 27<sup>th</sup> July 2016
- 13<sup>th</sup> October 2016
- 9<sup>th</sup> Feb 2017
- 14<sup>th</sup> March 2017
- 16<sup>th</sup> May 2017
- 16<sup>th</sup> February 2018
- 1<sup>st</sup> May 2018
- 3<sup>rd</sup> July 2018
- 18<sup>th</sup> September 2018
- 13<sup>th</sup> November 2018
- 25<sup>th</sup> January 2019
- 07<sup>th</sup> February 2019
- 12<sup>th</sup> March 2019
- 04<sup>th</sup> April 2019 (sub group meeting)
- 07<sup>th</sup> May 2019
- 05<sup>th</sup> June 2019 (sub group meeting)
- 16<sup>th</sup> July 2019
- 25<sup>th</sup> July 2019
- 17<sup>th</sup> September 2019
- 19<sup>th</sup> September 2019 (sub group meeting)
- 12<sup>th</sup> November 2019

## **Appendix 2 - Evidence of activities undertaken to address an issue**

Local Plan consultations:

### Lambeth

On 9<sup>th</sup> October 2017, Lambeth notified Bromley that the first stage of public consultation on the Lambeth Local Plan Review (Regulation 18 part 1 - Issues consultation) would run for eight weeks from 9 October to 4 December 2017. Lambeth invited Bromley to make representations. No representations were received.

On 22<sup>nd</sup> October 2018, Lambeth notified Bromley that the second stage of public consultation on the Lambeth Local Plan Review (regulation 18 part 2 - Draft Revised Lambeth local Plan 2018) would run for eight weeks from 22 October to 17 December 2018. Lambeth invited Bromley to make representations.

### Schedule of representations received from Bromley in the DRLLP regulation 18 consultation

On 21<sup>st</sup> December 2018, LB Bromley submitted comments on the Draft Revised Lambeth Local Plan 2018. The table below outlines the points made by Bromley, relevant to this Statement, and the proposed Lambeth response.



Representation Wording	Plan Section	Policy/Sites/General/Policies Map/Issue	Sub-policy/Paragraph/Site	Supporting Text/Site	Officer Response	Proposed Change in DRLLP PSV
<p>The London Borough of Bromley is committed to engaging positively with its neighbours not only to satisfy the requirements of the “Duty to Cooperate” but also to ensure that any potential adverse impacts on its own communities are highlighted and investigated. We support the broad objectives of the Draft Revised Local Plan.</p> <p>We look forward to engaging with you further in relation to cross-boundary strategic matters in the future</p>	General	Duty to Cooperate			Noted.	No change.
<p>Bromley wishes to register 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. Bromley will be making representations to the draft London Plan Examination in Public in respect of the housing target for Bromley and in particular the impact of the small sites target.</p>	Section 05	H01			Lambeth notes Bromley's concern about the proposed new housing target for the borough. However, the question of housing targets in the Draft London Plan will be the subject of the EIP of that document. Lambeth intends the DRLLP to be in general conformity with the new London Plan and the housing target included in the DRLLP reflects this position.	No change
<p>Finally, Bromley notes the inclusion of expanded Strategic Areas for Regeneration in the Draft Revised Local Plan in the vicinity of the boundary with Bromley, reflecting the Draft London Plan. Bromley welcomes any future opportunities to comment on proposals within these areas that may potentially have cross-boundary implications.</p>	Annex	Annex 14			Support noted. Where there are likely to be cross-border impacts, this issue can be addressed in the Statement of Common Ground between the two boroughs.	No change

