

**Site Allocations Development Plan  
Document: Proposed Submission Version  
(Regulation 19)**

**Duty to Cooperate –  
Statement of Compliance**

**March 2024**

  
**Lambeth**

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## 1. Introduction

- 1.1 This Statement of Compliance sets out how the London Borough of Lambeth (LBL) has sought to meet the requirements of the Duty to Cooperate (DtC) throughout the preparation of the Site Allocations Development Plan Document (SADPD).
- 1.2 As set out in the National Planning Policy Framework (NPPF), paragraph 24 says that strategic policy-making authorities are under a DtC with each other and other prescribed bodies and organisations. This seeks to ensure a joined-up approach to plan-making is taken, with collaborative working on strategic and cross-border matters.
- 1.3 This Statement provides an overview of joint working taken to date, and identifies how LBL is responding to any key strategic and cross-boundary issues identified through working with our partners.
- 1.4 In addition, this Statement sets out how LBL has sought to engage and cooperate with neighbouring authorities and the other prescribed bodies. This forms part of the evidence base for the SADPD, helping demonstrate that the SADPD is legally compliant and meets the tests of soundness, as set out in the NPPF.
- 1.5 Details of all meetings held with partners are set out in Annexe 1 and 2 of this document.
- 1.6 Where helpful, LBL has agreed Statements of Common Ground (SoCG) with neighbouring boroughs. This sets out areas of agreement and outlines future opportunities for engagement under the DtC. These Statements are provided in the annexe to this document.
- 1.7 This is a working document and will be updated in the future to reflect any further engagement and cooperation following the Council's Reg 19 consultation on the SADPD PSV (Town and Country Planning Act (Local Planning) (England) Regulations 2012).

## 2. Legal and Policy Context

- 2.1 The DtC is a statutory duty that local planning authorities must adhere to, as required by the Localism Act 2011 and the NPPF 2023.
- 2.2 Section 110 of the Localism Act inserted Section 33A into the Planning and Compulsory Purchase Act 2004. This places a legal duty on Local Planning

Authorities (LPAs) and other prescribed bodies to engage constructively and actively and on an ongoing basis to maximise the effectiveness of local plan preparation in the context of strategic cross boundary matters. LPAs must demonstrate how they have complied with the Duty at the examination stage of their Local Plan.

- 2.3 The NPPF states that LPAs are under a DtC with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries and this should clearly be reflected in individual Local Plans.
- 2.4 Paragraph 24–27 of the NPPF set out where collaboration amongst local communities and relevant bodies is expected and gives further guidance on planning strategically across local boundaries. It also requires demonstration that local plan documents are deliverable and are based on effective joint working on cross boundary strategic priorities.
- 2.5 Para 27 of the NPPF says that in order to demonstrate effective and on-going joint working, strategic policy-making 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.

### 3. Defining Lambeth's Duty to Cooperate Bodies

- 3.1 The NPPF and Planning Practice Guidance highlight that LPAs have a DtC on planning issues that cross administrative boundaries. This section sets out the bodies with which LBL is required to cooperate.
- 3.2 The LBL is an inner London borough with a northern boundary on the river Thames and is situated mainly between the boroughs of Wandsworth and Southwark. It covers an area of approximately ten and a half square miles. It is neighbour to the following seven London Boroughs:
  - City of London;
  - City of Westminster;
  - London Borough of Bromley;
  - London Borough of Croydon;
  - London Borough of Merton;



- London Borough of Southwark; and
- London Borough of Wandsworth.

### Prescribed bodies

3.3 Certain public bodies are also subject to the DtC. These are prescribed in the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) as follows:

- Mayor of London;
- Transport for London;
- Environment Agency;
- Natural England;
- English Heritage (now called Historic England);
- Civil Aviation Authority;
- Homes and Communities Agency (now Homes England);
- National Health Service Commissioning Board (now called NHS England);
- Clinical Commissioning Groups (now Integrated Care Systems);
- Office of Rail and Road;
- Highway authorities; and
- Marine Management Organisation.

3.4 For some of the prescribed public bodies, there are particular circumstances, where the jurisdiction may differ within Greater London and where certain bodies have changed since Regulations came into force. These are set out below.

3.5 The Mayor of London's planning team is responsible for producing the London Plan, the spatial development strategy for London. The London Plan forms part of the statutory development plan for London, and there is a requirement for the SADPD to be in general conformity with the London Plan 2021. LBL works in close partnership with the Mayor of London and the Greater London Authority (GLA) and Transport for

London (TfL), cooperating in plan-making activities and decisions on planning applications, alongside various other matters beyond planning.

- 3.6 While there are no airfields within the borough of Lambeth, it is the Civil Aviation Authority's (CAA) and local Air Traffic Control centres' responsibility to ensure safe helicopter flights across London.
- 3.7 The powers of the Homes and Communities Agency (now Homes England) are devolved in London to the Mayor.
- 3.8 The National Health Service Commissioning Board is now NHS England. It is an executive non-departmental public body, sponsored by the Department of Health and Social Care. NHS England has statutory accountability for oversight of both Integrated Care Boards (ICBs) and providers of NHS services.
- 3.9 Clinical Commissioning Groups (CCGs) were replaced by ICBs in 2022, taking on the NHS planning functions previously held by CCGs (as well as absorbing some planning roles from NHS England). In Lambeth, this role is carried out by the South-East London Integrated Care System (ICS).
- 3.10 The Office of Rail and Road oversees Network Rail and National Highways in Britain. Lambeth's transport officers are also in regular contact with Network Rail, TfL and Train Operating Companies operating within the borough (Southwestern Railway, Southeastern, Southern, Thameslink and London Overground).
- 3.11 In London, the equivalent of the Integrated Transport Authority is TfL. The highway authorities in Lambeth are Lambeth council or TfL, depending on the type of road.
- 3.12 The Marine Management Organisation (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.

#### 4. Preparation of the SADPD and summary of engagement so far

- 4.1 This section provides an overview of the preparation of the SADPD to date and sets out how the Council has engaged with Duty to Cooperate bodies as part of this process.
- 4.2 A full schedule of relevant engagement is set out in Annexe 1 of this document.

## Initial Plan Preparation

- 4.3 Preparation of the SADPD began in 2020, coinciding with work on the Lambeth Local Plan 2021. The SADPD will add site-specific policies to those already in the Lambeth Local Plan 2021, and will form part of the statutory Development Plan for Lambeth.
- 4.4 The principal objective of the proposed SADPD is to help to unlock investment on the proposed sites for the benefit of residents through the mechanism of site-specific planning policy.
- 4.5 As part of the preparation of the draft SADPD for Reg 18 consultation, the Council engaged with a range of stakeholders, including both statutory and non-statutory bodies, as well as local communities.

## Preferred Options Stage (Reg 18 Consultation)

- 4.6 In December 2021, Cabinet agreed to publish the Regulation 18 consultation on the Draft SADPD to take place over six weeks between January and February 2022.
- 4.7 The consultation was consistent with the approach set out in the Council's Statement of Community Involvement 2020. In addition, all stakeholders and DtC bodies were informed of the consultation and invited to make representations.
- 4.8 A total of 3,308 representations were received from residents, landowners, business owners and other stakeholders. The Council also received representations from the following DtC Bodies:
  - GLA (on behalf of the Mayor of London);
  - TfL;
  - Historic England;
  - Environment Agency; and
  - Natural England.
- 4.9 Further information on the consultation is set out in [the Reg 18 Consultation Report](#), which includes schedules of all consultation responses and the Council's response. This is available in the [document library on the SADPD webpage](#).

## Publication Stage (Reg 19 consultation)

- 4.10 The SADPD PSV has been updated in response to representations received, DtC and engagement activities, updated evidence studies, recommendations of the Sustainability Appraisal, and changes to national planning policy and guidance where relevant.
- 4.11 As a result, all sites have undergone changes to policy wording, although the extent of the changes varies between sites. One site has been removed (Site 19 Knolly's Yard), two have had significant changes made to their boundaries, and a further three have had minor boundary changes made.
- 4.12 A summary of the proposed amendments is set out in Table 1 below.

Table 1: Summary of Proposed Amendments to the SADPD following Reg 18

Site No.	Site Address	Proposed Changes
Site 1	Royal Street, SE1	<ul style="list-style-type: none"> <li>The site area has been corrected from 7.2ha to 2.32ha (for clarification, this corrected a publishing error and the actual site area has not changed).</li> <li>Building heights and locations amended to address Historic England concerns regarding impact on World Heritage Site.</li> <li>No significant change to other development principles.</li> </ul>
Site 2	St Thomas' Hospital, SE1	<ul style="list-style-type: none"> <li>Site extended west to better facilitate development within the hospital estate.</li> <li>Building heights and locations amended to address impact on World Heritage Site.</li> <li>Policy wording updated to require development to be set back from the roadside to address stakeholders concerns re cumulative impact of development.</li> <li>No significant change to other development principles.</li> </ul>
Site 3	35 – 37 and Car Park Leigham Court Road, SW16	<ul style="list-style-type: none"> <li>Reduction in the number of residential units to be delivered. Decreased from 30-35 units to 25-30 units.</li> <li>No significant change to other development principles.</li> </ul>
Site 7	6 – 12 Kennington Lane and Wooden Spoon House, 5 Dugard Way, SE11	<ul style="list-style-type: none"> <li>Minor change to site boundary to reflect land registry ownership details.</li> <li>Reduction in the number of residential units proposed. Decreased from 135-145 units to 115-125 units.</li> <li>No significant change to other development principles.</li> </ul>
Site 8	110 Stamford Street, SE1	<ul style="list-style-type: none"> <li>Reduction in the number of residential units proposed. Decreased from 30-40 units to 30 units.</li> <li>No significant change to other development principles.</li> </ul>

Site 9	Gabriel's Wharf and Princes Wharf, Upper Ground, SE1	<ul style="list-style-type: none"> <li>• Policy wording updated to allow for an element of extra-care housing where need is demonstrated.</li> <li>• No significant change to development principles.</li> </ul>
Site 17	330 – 336 Brixton Road, SW9	<ul style="list-style-type: none"> <li>• Reduction in the number of residential units proposed. Decreased from 70-75 units to 60-70 units.</li> <li>• No significant change to other development principles.</li> </ul>
Site 18	300 – 346 Norwood Road	<ul style="list-style-type: none"> <li>• Significant local opposition to principle and scale of development.</li> <li>• Site boundary amended to reduce scale of allocation to exclude existing housing at northeast corner and southwest corner, also 'laundry' site which is already under construction.</li> <li>• Reduction in the number of residential units proposed. Decreased from 390-470 units to 150-170 units.</li> <li>• Quantum of commercial/community floorspace including light industrial workspace, reduced from 5,000-7,000 sqm to 3,000-4,000 sqm to include at least 1,123 sqm GIA light industrial workspace (to achieve no net loss of existing industrial floorspace capacity).</li> <li>• Additional wording proposed to clarify that a tall building will only be considered appropriate on the site if certain conditions are met e.g. public benefits are achieved.</li> <li>• No significant change to other development principles.</li> </ul>
Site 19	Knolly's Yard, SW16	<ul style="list-style-type: none"> <li>• Significant local opposition to principle and scale of development.</li> <li>• Deputy Leader confirmed site to be removed.</li> <li>• Site no longer proposed for allocation.</li> </ul>
Site 20	Tesco, 13 Acre Lane, SW2	<ul style="list-style-type: none"> <li>• Minor amendment to site boundary.</li> <li>• Proposed quantum of residential development increased from 120 -170 units to 180 -210 units.</li> <li>• No significant change to other development principles.</li> </ul>
Site 21	51-57 Effra Road, SW2	<ul style="list-style-type: none"> <li>• Site boundary amended to remove Fitch Court, Brixton Unitarian Church and Mosaic Centre.</li> <li>• Reduction in the number of residential units proposed. Decreased from 200-240 units to 85-95 units.</li> <li>• No significant change to other development principles.</li> </ul>
Site 22	1 & 3–11 Wellfit Street, 7–9 Hinton Road & Units 1–4 Hardess Street SE24	<ul style="list-style-type: none"> <li>• Indicative servicing location amended to be within the site on the servicing route (rather than on Hardess Street).</li> <li>• Proposed pedestrian link with Higgs through railway arch removed.</li> <li>• Reduction in the number of residential units proposed. Decreased from 70-90 units to 50-70 units.</li> <li>• Policy wording added related to the development implications for trees.</li> <li>• No significant change to other development principles.</li> </ul>

Site 23	Land at corner of Coldharbour Lane and Herne Hill Road, SE24	<ul style="list-style-type: none"> <li>• Indicative locations of National Grid assets included on context map.</li> <li>• Indicative light industrial area and the extent of ‘sensitive residential neighbour’ to be extended on the vision map</li> <li>• Reduction in the number of residential units proposed. Decreased from 30-40 units to 25-30 units.</li> <li>• Factual updates to policy text.</li> <li>• No significant change to other development principles.</li> </ul>
Site 24	King’s College Hospital, Denmark Hill, SE5	<ul style="list-style-type: none"> <li>• Factual updates to policy text.</li> <li>• Clarification regarding the safeguarded waste site within the site added.</li> <li>• No significant change to other development principles.</li> </ul>

4.13 Further work has also been undertaken on the evidence base, including additional heritage and design work, viability, and daylight and sunlight testing. Full details of this are set out in the [Reg 19 Cabinet Report](#) dated 15 January 2024, with documents available in the [document library on the SADPD webpage](#).

4.14 Further meetings were held with all neighbouring authorities and where appropriate prescribed bodies, to consider any potential cross-boundary and strategic issues. Meetings provided an opportunity to ensure any matters raised in representations provided at Reg 18 have been properly considered, and to ensure necessary changes have been incorporated.

**Statements of Common Ground**

4.15 Paragraph 27 of the NPPF requires strategic policy making authorities to, ‘prepare and maintain one or more statements of common ground (SoCG) documenting the cross-boundary matters being addressed and progress in cooperating to address these.’ SoCG are required ‘in order to demonstrate effective and on-going joint working.’

4.16 SoCG have been agreed or are in the process of being agreed with all neighbouring boroughs, and also with the GLA and Historic England. These SoCG and a statement of compliance with the DtC will be submitted to the Planning Inspectorate alongside the SADPD PSV.

4.17 Copies of the signed SoCG are provided in Annexe 2 of this document. The Statements demonstrate that effective cooperation has been made, and it is

considered that the proposed site allocation policies are unlikely to cause any cross-boundary or strategic issues.

- 4.18 The Council is in the process of drafting SoCG with the City of London, Historic England and the GLA as discussed in Section 5.

## 5. Outstanding Matters

- 5.1 The Council has sought to engage effectively with all bodies under the DtC in order to reach agreement on any matters raised through the consultation process.
- 5.2 The Council is in the process of agreeing SoCG with the GLA, City of London and Historic England. The GLA and Historic England have confirmed they will advise re. signing ahead of the submission of the SADPD to the Inspector This approach is standard practice for the GLA and Historic England and it is not envisaged any unforeseen issues will arise.

### GLA (On behalf of Mayor of London)

- 5.3 Officers from LBL have met with their counterparts at the GLA regularly throughout the production of the SADPD.
- 5.4 The GLA made representations to the Reg 18 consultation on the draft SADPD in early 2022. The Council has strived to respond to concerns raised by the GLA's response, and has met with them on a number of occasions to agree changes to be made to the SADPD PSV.
- 5.5 The GLA has been briefed on all changes made to the SADPD in response to matters raised at Reg 18. LBL Officers have also confirmed the majority of proposed amendments have been incorporated and the SADPD PSV amended accordingly.
- 5.6 While Officers at the GLA have agreed in principle to the new policy wording and confirmed they are satisfied with the proposed approach, Officers have advised their Authority's approach is to consider SoCG post-Reg 19 consultation and in the run up to the examination.

### City of London

- 5.7 Officers from LBL have also met with their counterparts at the City of London regularly throughout the production of the SADPD.

- 5.8 The City of London is also preparing to publish its draft City Plan 2040 for Reg 19 consultation in Spring 2024. Officers from both parties are in the process of agreeing a SoCG which details the cross-boundary matters being addressed and progress in cooperating to address these in relation to both parties' emerging planning policy documents.
- 5.9 In regard to the SADPD, no significant cross-boundary issues have been raised. A final SoCG between the two parties is expected to be agreed shortly. Once signed, the SoCG will be made available in the document library on the SADPD webpage.

### Historic England

- 5.10 LBL Officers and Historic England Officers have met regularly throughout the preparation of the SADPD. Full details are set out in Annexe 1 of this report.
- 5.11 Historic England made representations to the Reg 18 consultation on the draft SADPD in early 2022. The Council has responded positively to concerns raised by Historic England.
- 5.12 Although briefed on the evolving Council approach to heritage, Historic England has not had sight of the updated evidence base prior to Reg 19 publication. Therefore, at present, Historic England has been unable to confirm or agree that all strategic matters have been resolved.
- 5.13 In the spirit of collaborative working, Historic England has advised that it will be better placed to agree the final wording in a SoCG once the Reg 19 consultation and evidence base have been reviewed in full.

## 6. Conclusion

- 6.1 During the preparation of the SADPD, the Council has engaged actively with a wide range of stakeholders, including all DtC bodies. The SADPD PSV published under Regulation 19 reflects the views and comments received during the engagement and cooperation process.
- 6.2 This report, in addition to the Reg 18 Consultation Report and the SoCG, demonstrate how the Council has positively complied with its DtC. In due course, an updated Statement of Compliance will be submitted to the Inspector to demonstrate that the SADPD is based on effective joint working across local authority boundaries, and it is legally compliant.



6.3 As stated above, the Duty to Cooperate Statement of Compliance is a live document and will be updated prior to submission of the SADPD PSV to take account of any further engagement made after Reg 19 and will include any outstanding SoCG.

## Annexe one – Relevant Engagement with Prescribed Bodies

This section provides a record of relevant Duty to Cooperate activity between April 2020 and March 2024:

### GLA (on behalf of the Mayor of London)

Throughout 2020 and 2021, Officers from Lambeth were in regular contact with GLA Officers in relation to the Homebuilding Capacity Fund Grant for its SADPD, in particular in relation to grant claims.

In January 2022, the Mayor was notified and invited to make comments on Lambeth's Draft SADPD. On behalf of the Mayor, the GLA submitted representations in February 2022 which requested several changes to the draft document. Lambeth policy officers have responded to the comments and made revisions to the SADPD PSV as a result. The comments from the Mayor are available in full in the Council's Reg 18 consultation report, alongside Lambeth's response and any changes to the SADPD.

In March 2022, officers from Lambeth submitted representations to the Mayor on two draft London Plan Guidance documents on Optimising Site Capacity and Small Sites Design Codes.

In Autumn 2022, officers from Lambeth met with their counterparts at the GLA to discuss issues raised by the GLA in the representations submitted at Reg 18.

In October 2023, officers from Lambeth met with their counterparts at the GLA to finalise changes being made to the SADPD in response to GLA comments made at Reg 18. The discussion focused on key changes to the policy text and the format of the future SoCG.

### Transport for London (TfL)

In December 2020, Lambeth undertook early engagement with TfL on the emerging SADPD and received high level initial comments later in the month.

In January 2022, TfL were notified and invited to make comments on Lambeth's Draft SADPD. TfL responded on 18 February 2022, suggesting various changes to the draft document. Lambeth policy officers have responded to the comments and made revisions to the SADPD PSV as a result. The comments from TfL are available in full in the council's Reg 18 consultation report, alongside Lambeth's response and any changes to the SADPD.

In February 2022, TfL's commercial property team provided a separate response to the draft SADPD. Lambeth policy officers have considered and responded to the comments. The comments from TfL are available in full in the council's Reg 18 consultation report, alongside Lambeth's response and any changes to the SADPD.

## Environment Agency

In July 2020, Lambeth sought comments from the Environment Agency (EA) on the draft Scoping Report for the Integrated Impact Assessment on the SADPD. The EA responded on 2 September 2020 with their comments on the draft Scoping Report.

In April 2021, officers from Lambeth contacted the EA for comment on its Draft Flood Risk Evidence Base Report for its SADPD. In June 2021, the EA responded to Lambeth's request and provided feedback on the draft. Comments from the EA were incorporated into the final document.

In January 2022, the EA were notified and invited to make comments on Lambeth's Draft SADPD. The EA raised issues related to water quality and biodiversity net gain (BNG). The EA also provided an assessment of the proposed site allocations against Flood Zones, proximity to rivers and flood defences, groundwater source protection zones and permitted waste management sites. The EA requested that the evidence base for the individual sites should include site specific information on the environmental constraints for each site such as contamination, water resources, biodiversity and the impact on the River Thames and Thames Path.

The comments from the EA are available in full in the council's Reg 18 consultation report, alongside Lambeth's response and the proposed changes to the SADPD that were made as a result.

## Natural England

In July 2020, Lambeth sought comments from Natural England on the draft Scoping Report for the Integrated Impact Assessment on the SADPD, which was in the very initial stages of preparation. They responded on 19 August 2020 saying that they had no comments to make.

In January 2022, Natural England were notified and invited to make comments on Lambeth's Draft SADPD. Natural England responded on 17 February 2022, stating that they had no comments to make on this consultation.

## Historic England

In July 2020, Lambeth sought comments from the Historic England (HE) on the draft Scoping Report for the Integrated Impact Assessment on the SADPD, which was in the very initial stages of preparation. HE responded to the consultation on 2 September 2020 with their comments.

In September 2021, officers from Lambeth met with HE. Lambeth provided an overview of the council's objectives and approach for the Draft SADPD, outlining the basic framework for site allocations, alongside its expected timetable for the draft plan. Officers from Lambeth presented the key heritage and design considerations for each site. HE advised on the heritage sensitivities of certain site allocations and recommended additions to the draft text and maps within the SADPD.

In January 2022, HE was notified and invited to make comments on Lambeth's Draft SADPD. Historic England responded, suggesting various changes to the document. Lambeth policy officers have responded to the comments and made revisions to the SADPD PSV as a result. The comments from Historic England are available in full in the Council's Reg 18 consultation report.

In March 2022, Lambeth officers met with HE. Both parties discussed current work priorities and programmes. The SADPD PSV and the potential impact of development on the Westminster World Heritage Site was also discussed.

In October 2023, Lambeth officers met with HE to discuss proposed changes being made to the SADPD PSV in light of the body's comments at Reg 18. Discussions focused on the policy text and refinements to the evidence base in the context of sites in the vicinity of the Westminster World Heritage Site. Both parties discussed the format of a future SCG.

## Civil Aviation Authority

In January 2022, the Civil Aviation Authority were notified and invited to make comments on Lambeth's Draft SADPD. No representations were received.

## NHS England and South East London ICS

Lambeth Council continued to work with the ICS and other One Public Estate partners, including South London and Maudsley (SLAM) and Guy's and St Thomas' Foundation Trust (GSTT), across One Public Estate Partnership Board throughout the course of plan preparation. NHS England and the ICS are partnered with various bodies with interests at

Site Allocation 1 (Royal Street), Site Allocation 2 (Guy's and St Thomas'), Site Allocation 7 (Wooden Spoon House, Kennington Lane), Site 17 (WeAre336 at Brixton Road), and Site 24 (King's College Hospital, Denmark Hill).

In January 2021, SLAM met with Lambeth to discuss its future service provision and spatial needs within the borough.

In September 2021, Lambeth met with GSTT to discuss the inclusion of GSTT's Wooden Spoon House site as part of the adjacent 6-12 Kennington Lane within the Draft SADPD.

In December 2021, Lambeth convened with the Capital Planning and Property team at SLAM Hospital Trust. Lambeth confirmed its Brixton Road facilities were included within the Draft SADPD. The two parties agreed to continue working at a strategic level on land and property and explore the potential for joint working and alignment of its development opportunities across the borough.

In January 2022, Lambeth officers met with GSTT to provide an overview of the council's objectives and approach for the Draft SADPD, details on the draft allocations within the document, alongside its expected timetable for the draft plan.

In January 2022, NHS England and various groups within the ICS were notified and invited to make comments on Lambeth's Draft SADPD. No representations were received.

### Office of Rail and Road

In January 2022, Lambeth notified the Office of Rail and Road (ORR) and invited comments on the SADPD. No comments were received.

### Marine Management Organisation

In January 2022, the Marine Management Organisation was notified and invited to make representations on Lambeth's Draft SADPD. No comments were received.

### Waste Planning Authority

Duty to Co-operate activity took place through the London Waste Planning Forum (LWPF). Officers attended LWPF meetings during the course of plan preparation.

## Annexe 2: Statements of Common Ground

The following Statements of Common Ground are appended to this report:

- Statement of Common Ground between LB Lambeth and City of Westminster
- Statement of Common Ground between LB Lambeth and LB Bromley
- Statement of Common Ground between LB Lambeth and LB Croydon
- Statement of Common Ground between LB Lambeth and LB Merton
- Statement of Common Ground between LB Lambeth and LB Southwark
- Statement of Common Ground between LB Lambeth and LB Wandsworth

Statement of Common Ground  
between the London Borough of  
Lambeth and City of Westminster

December 2023

# 1. Introduction

This Statement of Common Ground (SCG) has been prepared to demonstrate that Lambeth's Draft Site Allocations Development Plan Document (SADPD) is based on effective and continuous joint working on cross-boundary strategic matters, in accordance with the requirements of Section 33 A of the Planning and Compulsory Purchase Act, and paragraphs 24–27 of the National Planning Policy Framework.

The draft SADPD is not a review of the existing Lambeth Local Plan 2021. Once adopted the SADPD and Lambeth Local Plan 2021 will form part of the development plan for the borough, alongside the South Bank & Waterloo Neighbourhood Plan, and the London Plan 2021.

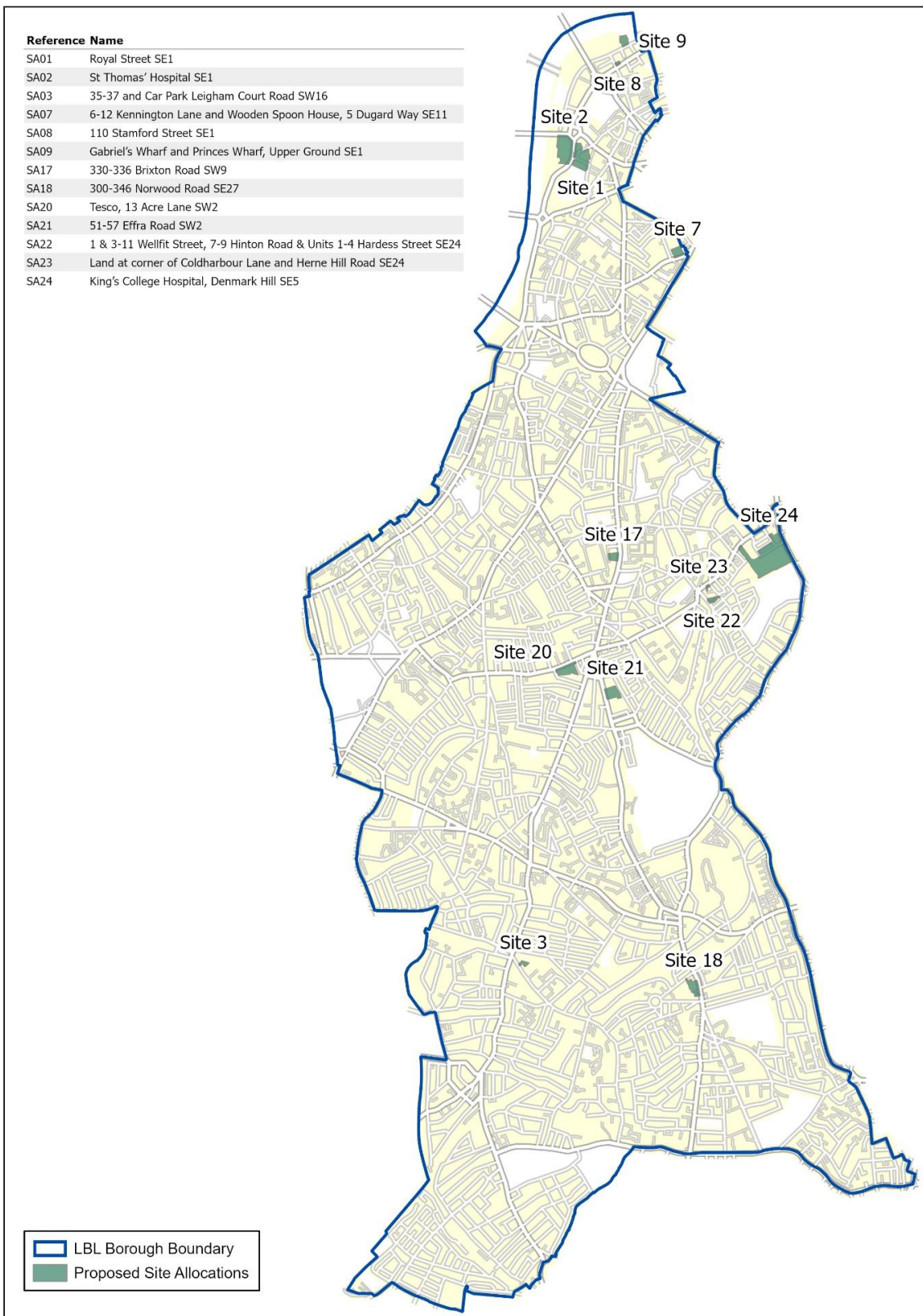
The principal objective of the SADPD is to unlock investment through the mechanism of site-specific planning policy. It will support the implementation of wider Council strategies including the Borough Plan, Economic Resilience Strategy, Transport Strategy and Climate Action Plan. It will add site-specific policies to existing development plan policy. The Draft SADPD includes policies for thirteen sites, distributed across the borough as shown on Map 1 below.

The purpose of the SCG is to document the cross-boundary matters being addressed and progress in cooperating to address these. This SCG supplements the existing SCG agreed between the boroughs in December 2019 (included in Annexe 2). This SCG confirms that continued engagement has taken place between the two parties, and that there is agreement that Lambeth's Draft SADPD is unlikely to create any additional strategic cross-border impacts within the City of Westminster. The two SCG are intended to be read together, with the arrangements made in the 2019 SCG continuing to have effect, alongside any future arrangements that may be agreed between the two parties.

Lambeth's Authority Monitoring Reports provide further details of how the Draft SADPD has been informed by ongoing engagement with key partners, including those that are not party to this SCG.



Map 1 – Draft site allocations\*



\*Please note, *Site 19 Knollys Yard* in West Norwood was removed from the SADPD following Reg 18 consultation.

## 2. Parties Involved

- London Borough of Lambeth
- City of Westminster

## 3. Strategic Geography

This section sets out the factual position regarding cross-boundary strategic matters. The location and administrative boundaries of each borough are shown on Maps 2 and 3 below.

### **The London Plan**

The London Plan 2021 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 current version of the London Plan was published March 2021.

### **LB Lambeth**

Lambeth is an inner London borough with a northern boundary on the River Thames and situated mainly between the boroughs of Wandsworth and Southwark. It covers an area of approximately ten and a half square miles. It is surrounded by seven other London Boroughs - LB Southwark; LB Bromley; LB Croydon; LB Merton; LB Wandsworth; City of Westminster and City of London.

### **City of Westminster**

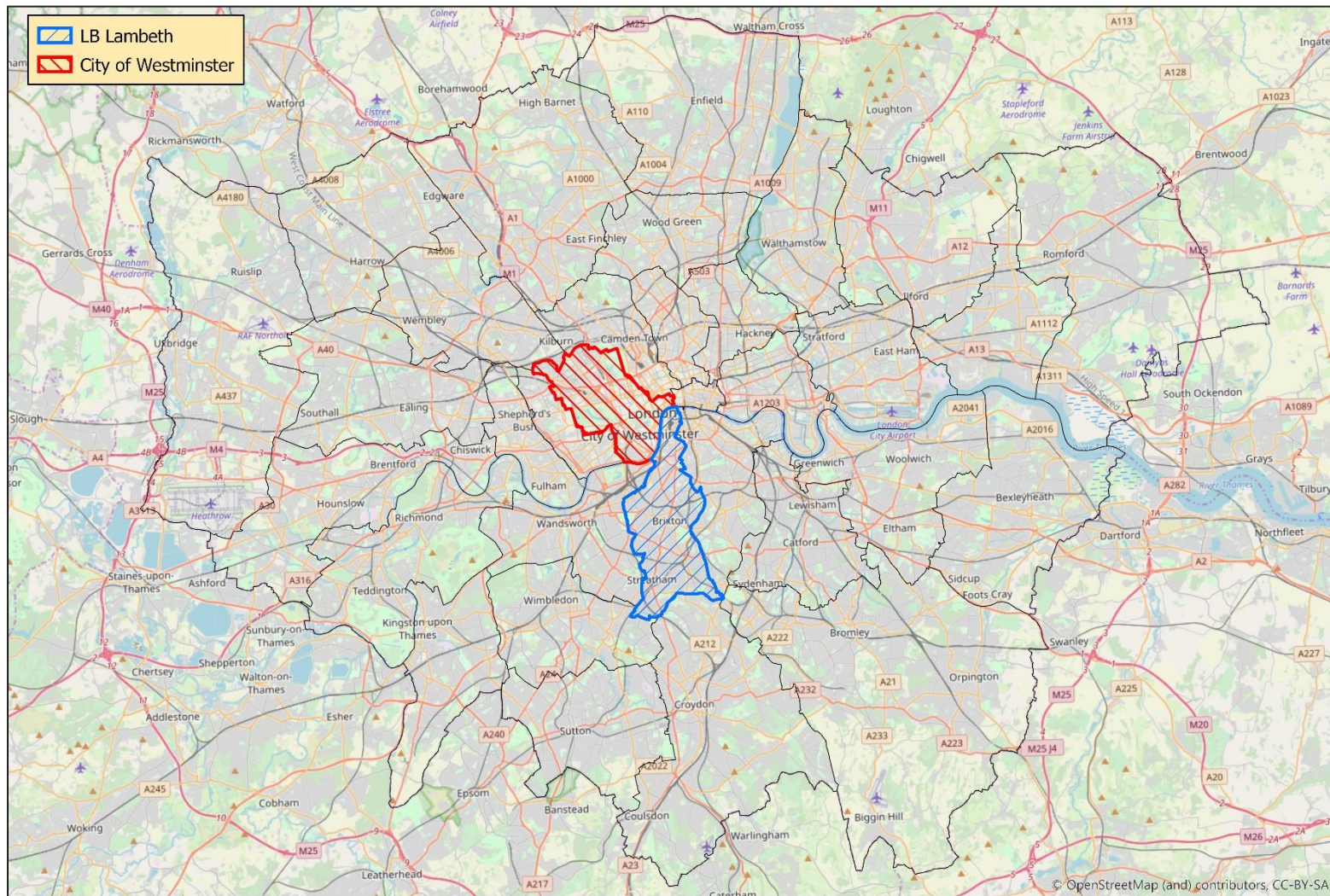
The City of Westminster is an inner London borough, situated in central London. The City of Westminster is bordered by the London Boroughs of Camden, Brent, Lambeth and Wandsworth, the City of London and the Royal Borough of Kensington and Chelsea. The London Borough of Southwark is also in close proximity to Westminster's south-eastern border at the River Thames.

Westminster and Lambeth do not share a land border but sit on opposite sides of the River Thames with a border down the centre of the River Thames of just over 3 km.

This SCG includes the whole of the LB Lambeth and the whole of the City of Westminster



Map 2 – Boroughs involved in this Statement

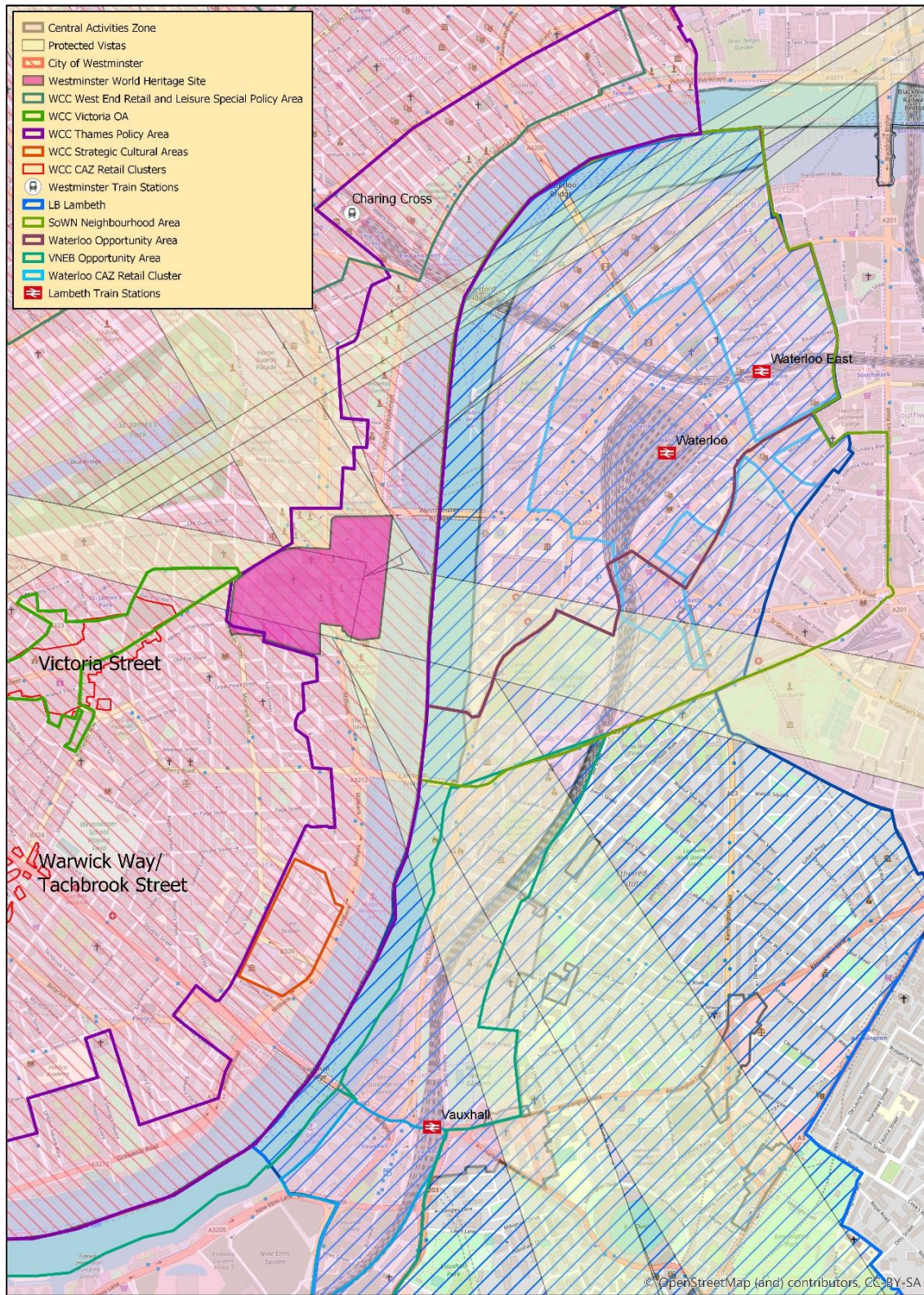


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Map 3 - Border between Lambeth and Westminster and key policy designations



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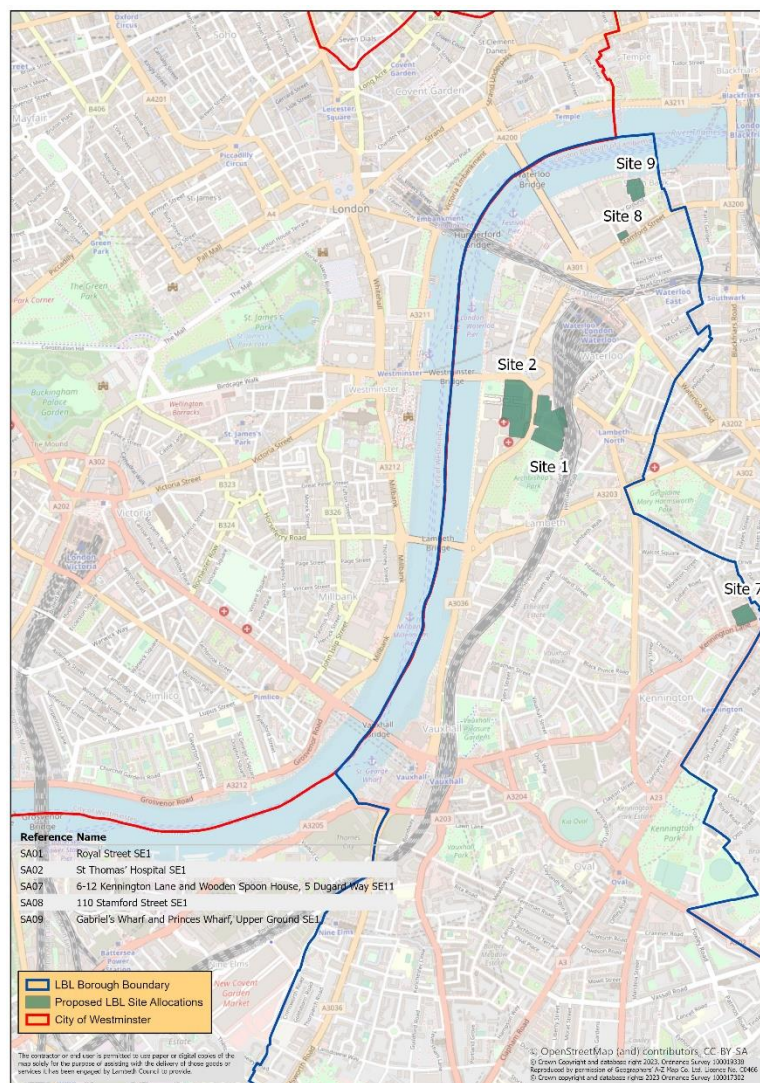
## 4. Strategic Matters

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

The parties met in November 2022 and in May 2023 to discuss the potential impact of the proposed site allocations set out in the draft SADPD. Particular attention was given to the potential impact that sites could have on any heritage assets located in Westminster. Details of this are set out below.

Given the scale of the proposed site allocations (the closest site allocation to Westminster is shown on Map 4 below), the parties agree that the proposed site allocations are unlikely to give rise to any cross-boundary issues of a strategic nature. Details regarding how any potential impacts will be mitigated are set out under the existing cross-border arrangements below.

Map 4 – Proximity of draft site allocations to the border of Westminster



## The Westminster World Heritage Site and Strategic Views

Westminster Palace, Westminster Abbey, and St Margaret's Church, are located adjacent to Lambeth's border with Westminster, separated by the River Thames. Collectively, these heritage assets are referred to as the Westminster World Heritage site, listed by UNESCO in recognition of its outstanding universal value and therefore deserving special protection.

Two of the proposed Site Allocations, Site 1 - Royal Street, and Site 2 - St Thomas' hospital, are situated within the wider setting of the WWHS and visible in the backdrop of protected Townscape View 27b *Parliament Square to Palace of Westminster*. Given the proximity of these site allocations to the WWHS, special care has been taken to ensure that the proposed site allocations preserve the significance/OUV of this designation, alongside other statutory and non-statutory heritage designations. At Royal Street and St Thomas' Hospital, the massing has been revised in response to World Heritage Site matters raised in Reg 18.

Design and Conservation Officers at Lambeth have met with their counterparts at Westminster to discuss the indicative modelling for each site. These models follow the design led approach to optimising site capacity, as established by London Plan Policy D3. It is agreed that the scale and massing of the model has been led by the context of the site and its surroundings, respecting any site constraints and building upon existing strengths and opportunities for the site.

In addition to its meetings with Westminster, Officers from Lambeth have met with Historic England to discuss the SADPD, with particular attention given to the WWHS and its setting. Lambeth has taken the views of Historic England into account when amending the draft site allocation.

Site Allocation 9 – Princes Wharf and Gabriels Wharf is also located on the border of Lambeth and Westminster. The northern part of this site allocation falls partly within the Protected Vista 8A.1 as detailed in the London View Management Framework. The proposed policy text and vision map for this site make clear reference to this protected vista, requiring any development to respect the Strategic Linear view 8 from Westminster Pier to St. The site is not considered appropriate for a tall building, though Taller elements of up to 44 metres may be possible to the south of the site outside of the LVMF view cone. It is agreed that this Site Allocation is not considered to give rise to any cross-border concerns.

Site Allocation 8 – Stamford Street is also located in relative proximity to the border with Westminster. Given the maximum building heights are capped at approximately 30 metres for this site, this Site Allocation is not considered to give rise to any cross-border concerns. It is agreed that this Site Allocation is not considered to give rise to any cross-border concerns.

## Existing cross-border arrangements

This SCG is intended to supplement the existing agreement signed by the parties in December 2019 (see Annexe 2 for a copy of this document). The existing agreement considers a wide range of strategic matters and sets out how the parties intend to deal with these issues. These include:

- Neighbourhood planning;
- Housing;
- Health
- Education;
- Telecommunications;

- Safety;
- Transport;
- Air quality;
- Waste management;
- Water supply and wastewater;
- Flood risk;
- Energy;
- Green infrastructure;
- Climate change;
- River Thames;
- Strategic and local views, and heritage, design and conservation; and
- Cultural infrastructure.

Alongside the heritage considerations detailed above, these existing arrangements are considered appropriate and proportionate for dealing with any potential strategic and cross-border issues that may arise and will continue to remain in place unless otherwise agreed.

This SCG demonstrates that discussions have taken place to consider any strategic cross-boundary issues that the draft SADPD may give rise to, and that both parties agree that no additional strategic issues are likely to arise as a result of this document (details set out in Annexe 1).

## 5. Governance Arrangements

This SCG has been informed by on-going engagement between the parties – as evidenced within Section 3 of this document which explains the joint working arrangements, alongside the schedule of engagement between the parties in Annexe 1.

These are live documents that are kept under review, 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 and Table 2) 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

LB Lambeth adopted its Local Plan in September 2021. As explained above, once adopted the SADPD and Lambeth Local Plan 2021 will form part of the development plan for the borough, alongside the South Bank & Waterloo Neighbourhood Plan, and the London Plan 2021. The key dates for this review are set out in Table 1 below.

LB Westminster adopted its Local Plan in April 2021. The council begun a partial review of its Local Plan in 2022, the key dates for this review are set out in Table 2 below.

Table 1: Current Development Plan Documents being produced by LB Lambeth

Dev Plan Document	Date of review	Reg 18 date	Anticipated Reg 19 date	Anticipated submission date
Site Allocations DPD	2021	Jan 2022	Spring 2024	Spring / Summer 2024

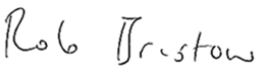

Table 2: Current Development Plan Documents being produced by the City of Westminster

Dev Plan Document	Date of review	Reg 18 date	Anticipated Reg 19 date	Anticipated submission date
City Plan Partial Review being produced by the City of Westminster	Call for sites Aug 2021	Nov 2022	Winter 2023/2024	Summer 2024

## 6. Signatures

Both parties agree that this SCG is an accurate representation of matters discussed and issues agreed upon.

It is agreed that these discussions will inform both the Lambeth SADPD and Westminster's future plan-making activities and both parties will continue to work collaboratively in order to meet the duty to cooperate.

<p>Signed: </p> <p>Name: Rob Bristow</p> <p>Position: Director for Climate Change, Planning and Transport</p> <p><b>London Borough of Lambeth</b></p> <p>Date: 25 January 2024</p>	<p>Signed: </p> <p>Name: Kimberley West</p> <p>Position: Head of Planning Policy</p> <p><b>City of Westminster</b></p> <p>Date: 12 December 2023</p>
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## Annexe 1. Schedule of engagement between the parties

In November 2020, the City of Westminster was notified and invited to make representations on Lambeth's Draft Local Views Supplementary Planning Document (SPD). No representations were received from the CoW.

In February 2020, the City of Westminster was notified and invited to comment on Lambeth's Draft Lambeth Design Code SPD. No representations were received from the CoW.

In January 2021, the City of Westminster was notified that Kennington Oval and Vauxhall (KOV) Neighbourhood Forum had applied to be re-designated and invited them to make representations. No representations were received from the CoW.

In January 2022, the City of Westminster was notified and invited to make comments on Lambeth's Draft SA DPD. No representations were received from the CoW.

In July 2022, the City of Westminster was notified and invited to make representations on Lambeth's Revised Draft Lambeth Design Guide SPD. No representations were received from the CoW.

On 15 February 2022, policy officers from both parties met to discuss strategic cross border planning matters under the duty to cooperate in relation to Lambeth's draft SADPD. Lambeth officers provided a presentation to Westminster's officers outlining the proposals including the nearest sites to the borough boundary.

On 29 November 2022, policy officers from both parties met to discuss strategic cross border planning matters under the duty to cooperate and to develop this SCG for the SADPD. Lambeth officers provided a presentation to Westminster's officers outlining the proposals including the nearest sites to the borough boundary. No issues were identified, and it was agreed that Lambeth would lead on this SCG.

On 10 May 2023, policy officers from both parties met to discuss strategic cross border planning matters under the duty to cooperate in relation to Lambeth's draft SADPD. Officers discussed the modelling for the site allocations, the Westminster World Heritage Site, and the form and scope of this SCG.

On 14 September 2023, policy officers from both parties met to discuss strategic cross border planning matters under the duty to cooperate in relation to Westminster's Local Plan Review. Officers discussed affordable housing, student accommodation, retrofit/demolition, and the proposed site allocations.

On 4 October 2023, policy officers from both parties met to discuss strategic cross border planning matters under the duty to cooperate in relation to Lambeth's draft SADPD. Officers discussed the final revisions to the modelling for the site allocations in the context of the Westminster World Heritage Site and key strategic views.

In addition, All London Borough Planning Officer meetings (Association of London Planning Officers) took place on the following dates:

- 30 April 2020 (Policy Officers Subgroup)
- 15 September 2020 (Development Plans meeting)
- 25 November 2020
- 15 February 2021
- 10 June 2021 (Sub-Committee)
- 29 June 2021 (Dev Plan meeting)
- 16 September 2021 (Dev Plan meeting)

- 12 October 2021 (Dev Plan meeting)
- 16 December 2021
- 8 March 2022 (Dev Plan meeting)
- 30 June 2022
- 18 October 2022
- 8 November 2022 (Dev Plan meeting)
- 23 January 2023

## Annexe 2. Dec 2019 Statement of Common Ground

[Please visit this link to the Local Plan 2021 evidence base for the Statement of Common Ground between London Borough of Lambeth and the City of Westminster December 2019](#)

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

December 2023

## 1. Introduction

This Statement of Common Ground (SCG) has been prepared to demonstrate that Lambeth's Draft Site Allocations Development Plan Document (SADPD) is based on effective and continuous joint working on cross-boundary strategic matters, in accordance with the requirements of Section 33 A of the Planning and Compulsory Purchase Act, and paragraphs 24–27 of the National Planning Policy Framework.

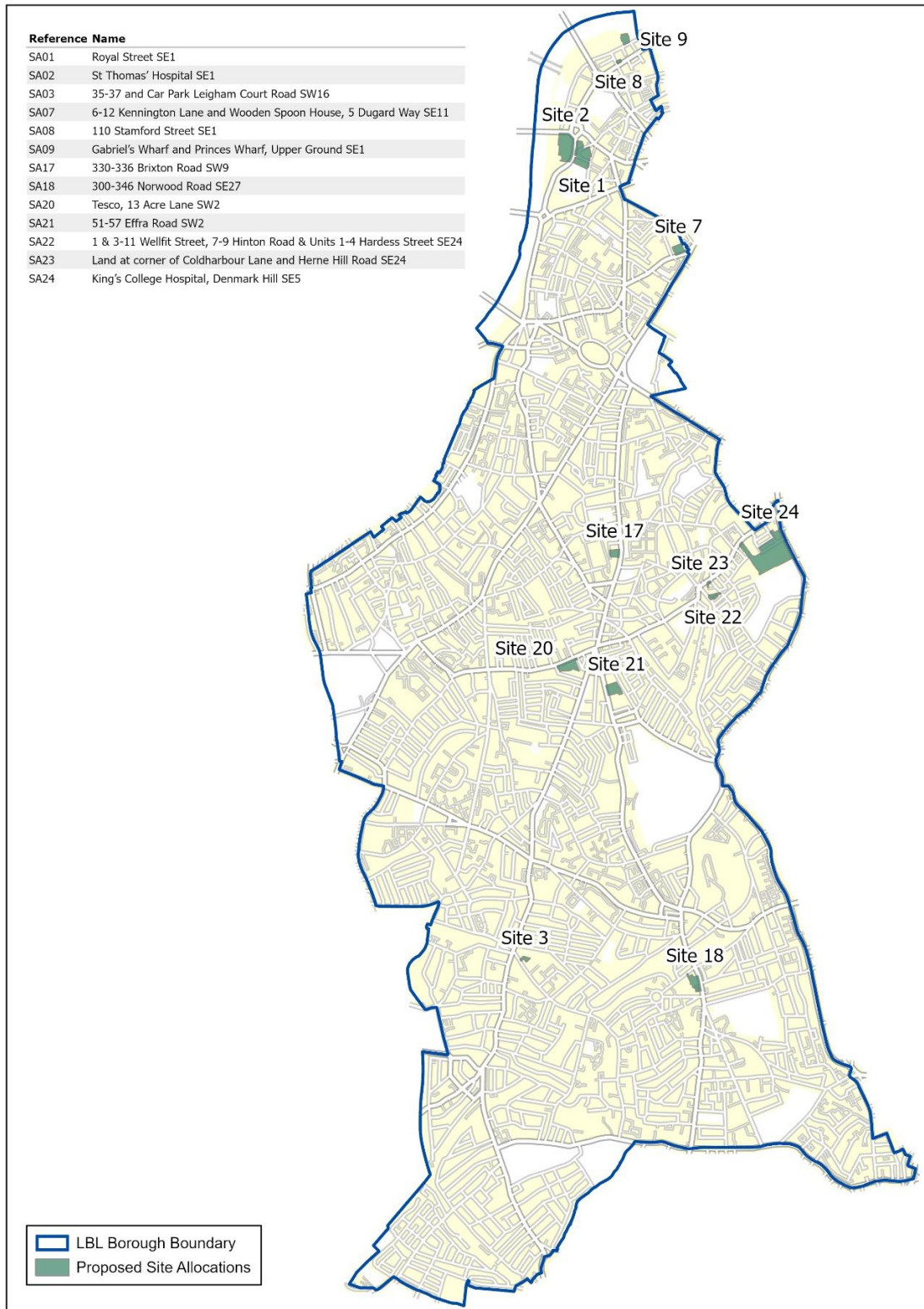
The draft SADPD is not a review of the existing Lambeth Local Plan 2021. Once adopted the SADPD and Lambeth Local Plan 2021 will form part of the development plan for the borough, alongside the South Bank & Waterloo Neighbourhood Plan, and the London Plan 2021.

The principal objective of the SADPD is to unlock investment through the mechanism of site-specific planning policy. It will support the implementation of wider Council strategies including the Borough Plan, Economic Resilience Strategy, Transport Strategy and Climate Action Plan. It will add site-specific policies to existing development plan policy. The Draft SADPD includes policies for thirteen sites, distributed across the borough as shown on Map 1 below.

The purpose of the SCG is to document the cross-boundary matters being addressed and progress in cooperating to address these. This SCG supplements the existing SCG agreed between the boroughs in December 2019 (included in Annexe 2). This SCG confirms that continued engagement has taken place between the two parties, and that there is agreement that Lambeth's Draft SADPD is unlikely to create any additional strategic cross-border impacts within LB Bromley. The two SCG are intended to be read together, with the arrangements made in the 2019 SCG continuing to have effect, alongside any future arrangements that may be agreed between the two parties.

Lambeth's Authority Monitoring Reports provide further details of how the Draft SADPD has been informed by ongoing engagement with key partners, including those that are not party to this SCG.

Map 1 – Draft site allocations\*



\*Please note, *Site 19 Knollys Yard* in West Norwood was removed from the SADPD following Reg 18 consultation.

## 2. Parties Involved

- London Borough of Lambeth
- London Borough of Bromley

## 3. Strategic Geography

This section sets out the factual position regarding cross-boundary strategic matters. The location and administrative boundaries of each borough are shown on Maps 2 and 3 below.

### **The London Plan**

The London Plan 2021 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 current version of the London Plan was published March 2021.

### **LB Lambeth**

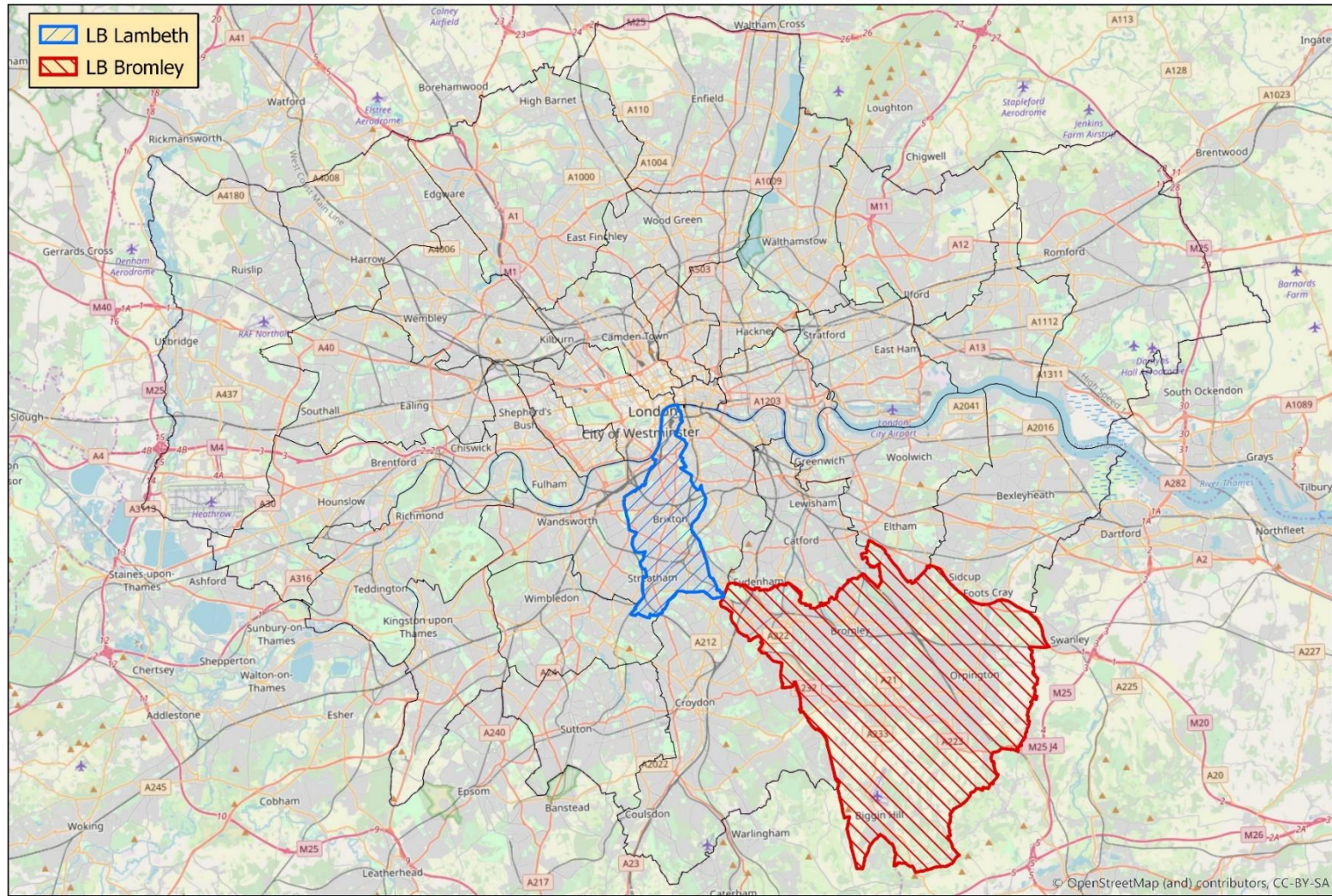
Lambeth is an inner London borough with a northern boundary on the River Thames and situated mainly between the boroughs of Wandsworth and Southwark. It covers an area of approximately ten and a half square miles. It is surrounded by seven other London Boroughs - LB Southwark; LB Bromley; LB Croydon; 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, with Greenwich, Lewisham, and Bexley to the north. It has a short border with Lambeth which 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.





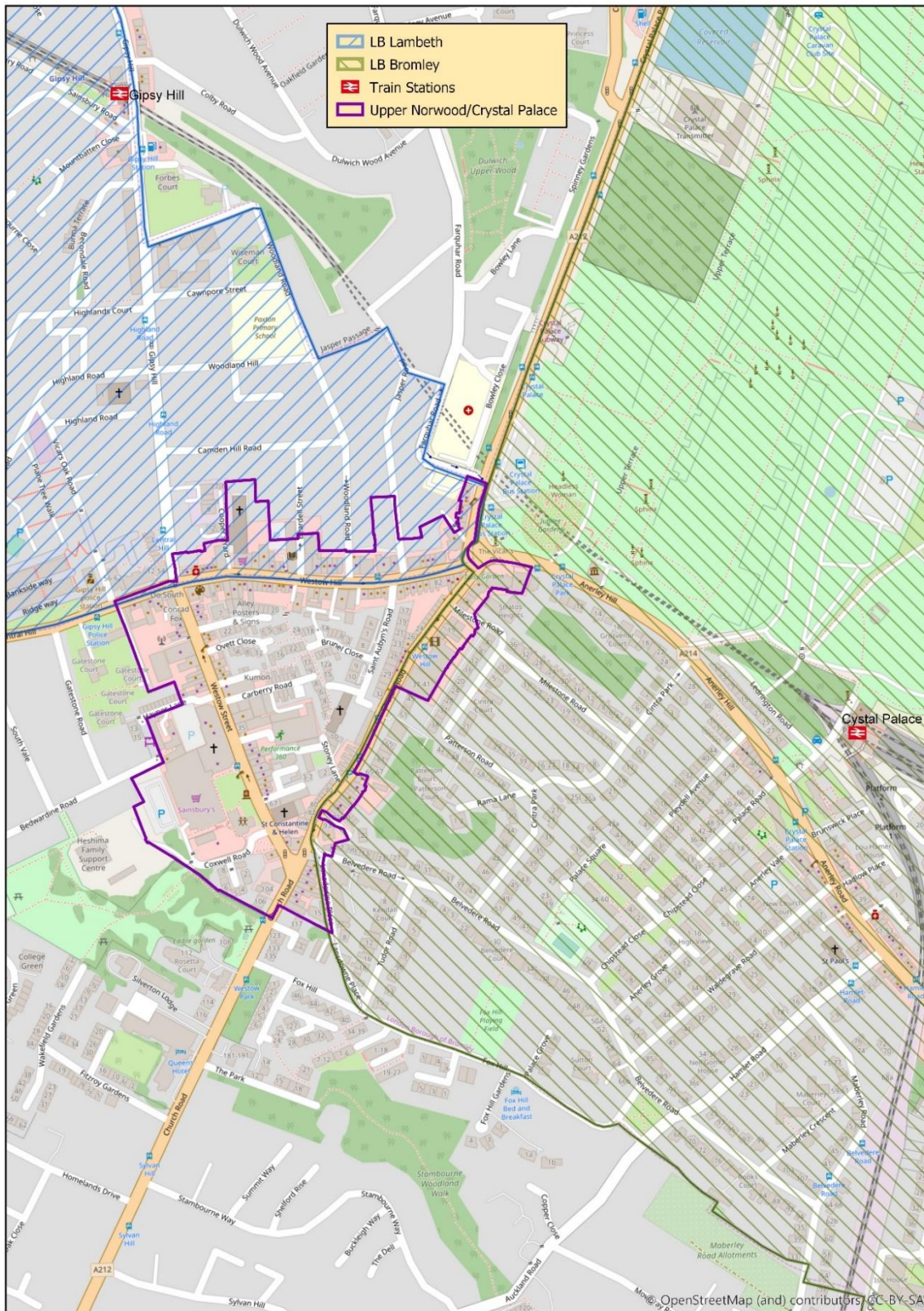
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Map 2 – Boroughs involved in this Statement



Map 3 - Border between Lambeth and Bromley, and Upper Norwood/Crystal Palace district centre boundary



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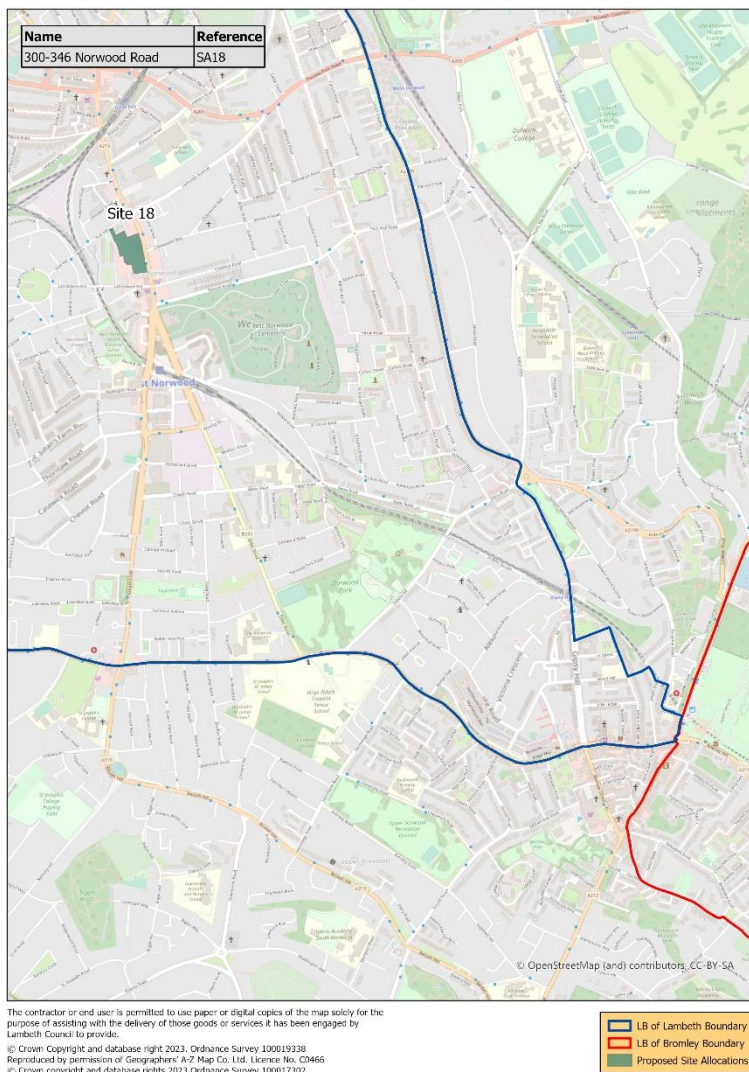


## 4. Strategic Matters

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

The parties met in November 2022 to discuss the potential impact of the proposed site allocations set out in the draft SADPD. Given the scale and location of the proposed site allocations (the closest site allocation to Bromley is shown on Map 4 below), the parties agree that the proposed site allocations are unlikely to give rise to any cross-boundary issues of a strategic nature.

Map 4 – Proximity of draft site allocations to the border of Bromley



This SCG demonstrates that discussions have taken place to consider any strategic cross-boundary issues that the draft SADPD may give rise to, and that both parties agree that no additional strategic issues are likely to arise as a result of this document (details set out in Annexe 1).

This SCG is intended to supplement the existing agreement signed by the parties in December 2019 (see Annexe 2 for a copy of this document). The existing agreement considers a wide range of strategic matters and sets out how the parties intend to deal with these issues. These include:

- Housing;
- Health;
- Education;
- Telecommunications;
- Security;
- Waste;
- Flood risk;
- Energy;
- Climate change;
- Local views; and
- Heritage and culture.

These existing arrangements are considered appropriate and proportionate for dealing with any potential strategic and cross-border issues that may arise and will continue to remain in place unless otherwise agreed.

## 5. Governance Arrangements

This SCG has been informed by on-going engagement between the parties – as evidenced within Section 3 of this document which explains the joint working arrangements, alongside the schedule of engagement between the parties in Appendix 1.

These are live documents that are kept under review, 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 and Table 2) 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

LB Lambeth adopted its Local Plan in September 2021. As explained above, once adopted the SADPD and Lambeth Local Plan 2021 will form part of the development plan for the borough, alongside the South Bank & Waterloo Neighbourhood Plan, and the London Plan 2021. The key dates for this review are set out in Table 1 below.

LB Bromley adopted its current Local Plan in January 2019. Work began on a review of its local plan in summer 2021, with the key dates set out in Table 2 below.

Table 1: Current Development Plan Documents being produced by LB Lambeth

Dev Plan Document	Date of review	Anticipated (or actual) Reg 18 date	Anticipated (or actual) Reg 19 date	Anticipated submission date
Site Allocations DPD	2021	Jan 2022	Spring 2024	Spring / Summer 2024

Table 2: Current Development Plan Documents being produced by LB Bromley

Dev Plan Document	Date of review	Anticipated (or actual) Reg 18 date	Anticipated (or actual) Reg 19 date	Anticipated submission date
Local Plan Review	Call for sites Aug to Nov 2021	Reg 18 issues and options consultation Apr to Jun 2023  Further Reg 18 anticipated early 2024	Mid-late 2024	Late 2024

## 6. Signatures

Both parties agree that this SCG is an accurate representation of matters discussed and issues agreed upon.

It is agreed that these discussions will inform both the Lambeth SADPD and Bromley's future plan-making activities and both parties will continue to work collaboratively in order to meet the duty to cooperate.

<p>Signed: </p> <p>Name: Rob Bristow</p> <p>Position: Director of Climate Change, Planning &amp; Transport</p> <p><b>London Borough of Lambeth</b></p> <p>Date: 25 Jan 2024</p>	<p>Signed: </p> <p>Name: Ben Johnson</p> <p>Position: Head of Planning Policy and Strategy</p> <p><b>London Borough of Bromley</b></p> <p>Date: 13 Dec 2023</p>
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## Annexe 1. Schedule of engagement between the parties since last SCG

In November 2020, LB Bromley (LBB) was notified and invited to make representations on Lambeth's Draft Local Views Supplementary Planning Document (SPD). No representations were received from the LBB.

In February 2020, LBB was notified and invited to comment on Lambeth's Draft Lambeth Design Code SPD. No representations were received from the LBB.

In January 2021, LBB was notified that Kennington Oval and Vauxhall (KOV) Neighbourhood Forum had applied to be re-designated and invited them to make representations. No representations were received from the LBB.

In January 2022, LBB was notified and invited to make comments on Lambeth's Draft SA DPD. No representations were received from the LBB.

In July 2022, LBB was notified and invited to make representations on Lambeth's Revised Draft Lambeth Design Guide SPD. No representations were received from the LBB.

On 25 November 2022, policy officers from both parties met to discuss strategic cross border planning matters under the duty to cooperate and to develop this SCG for the SADPD. Lambeth officers provided a presentation to Bromley officers outlining the proposals including the nearest sites. No issues were identified, and it was agreed that Lambeth would lead on this SCG.

In addition, All London Borough Planning Officer meetings (Association of London Planning Officers) took place on the following dates:

- 30 April 2020 (Policy Officers Subgroup)
- 15 September 2020 (Development Plans meeting)
- 25 November 2020
- 15 February 2021
- 10 June 2021 (Sub-Committee)
- 29 June 2021 (Dev Plan meeting)
- 16 September 2021 (Dev Plan meeting)
- 12 October 2021 (Dev Plan meeting)
- 16 December 2021
- 8 March 2022 (Dev Plan meeting)
- 30 June 2022
- 18 October 2022
- 8 November 2022 (Dev Plan meeting)
- 23 January 2023

## Annexe 2. December 2019 Statement of Common Ground

[Please visit this link to the Local Plan 2021 evidence base for the Statement of Common Ground between London Borough of Lambeth and the London Borough of Bromley December 2019](#)

Statement of Common Ground  
between the London Borough of  
Lambeth and London Borough of  
Croydon

December 2023

## 1. Introduction

This Statement of Common Ground (SCG) has been prepared to demonstrate that Lambeth's *Draft Site Allocations Development Plan Document (SADPD)* is based on effective and continuous joint working on cross-boundary strategic matters, in accordance with the requirements of Section 33 A of the Planning and Compulsory Purchase Act, and paragraphs 24–27 of the National Planning Policy Framework.

The SADPD is not a review of the existing Lambeth Local Plan 2021. Once adopted the SADPD and Lambeth Local Plan 2021 will form part of the development plan for the borough, alongside the South Bank & Waterloo Neighbourhood Plan, and the London Plan 2021.

The principal objective of the SADPD is to unlock investment through the mechanism of site-specific planning policy. It will support the implementation of wider Council strategies including the Borough Plan, Economic Resilience Strategy, Transport Strategy and Climate Action Plan. It will add site-specific policies to existing development plan policy. The Draft SADPD includes policies for thirteen sites, distributed across the borough as shown on Map 1 below.

The purpose of the SCG is to document the cross-boundary matters being addressed and progress in cooperating to address these. This SCG supplements the existing SCG agreed between the boroughs in December 2019 (included in Annexe 2). This SCG confirms that continued engagement has taken place between the two parties, and that there is agreement that Lambeth's Draft SADPD is unlikely to create any additional strategic cross-border impacts within LB Croydon though policies for thirteen sites, distributed across the borough. The two SCG are intended to be read together, with the arrangements made in the 2019 SCG continuing to have effect, alongside any future arrangements which are agreed between the two parties.

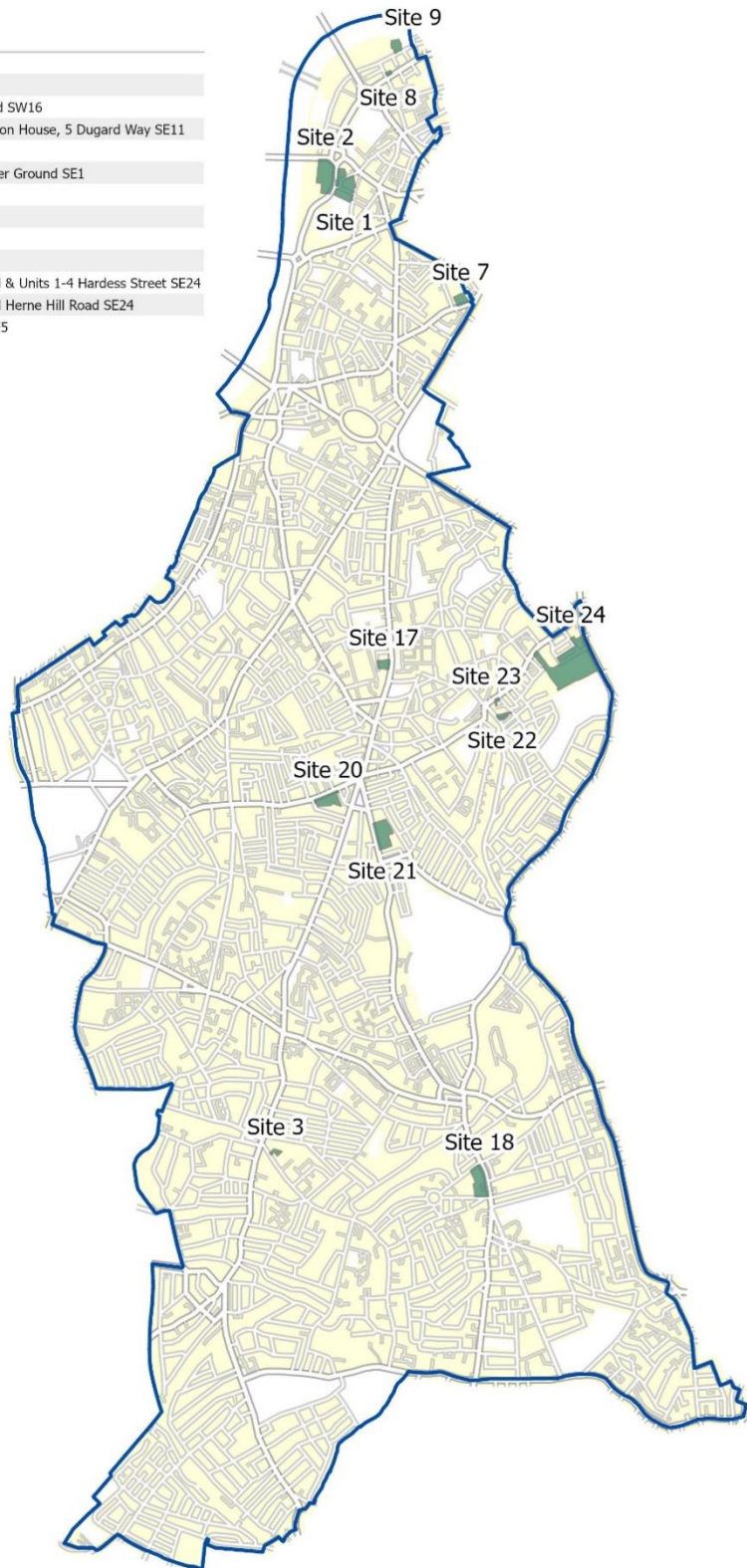
Lambeth's Authority Monitoring Reports provide further details of how the Draft SADPD has been informed by ongoing engagement with key partners, including those that are not party to this SCG.



Map 1 – Draft site allocations\*

**Reference Name**

SA01	Royal Street SE1
SA02	St Thomas' Hospital SE1
SA03	35-37 and Car Park Leigham Court Road SW16
SA07	6-12 Kennington Lane and Wooden Spoon House, 5 Dugard Way SE11
SA08	110 Stamford Street SE1
SA09	Gabriel's Wharf and Princes Wharf, Upper Ground SE1
SA17	330-336 Brixton Road SW9
SA18	286-362 Norwood Road SE27
SA20	Tesco, 13 Acre Lane SW2
SA21	51-65 Effra Road SW2
SA22	1 & 3-11 Wellfit Street, 7-9 Hinton Road & Units 1-4 Hardess Street SE24
SA23	Land at corner of Coldharbour Lane and Herne Hill Road SE24
SA24	King's College Hospital, Denmark Hill SE5



\*Please note, *Site 19 Knollys Yard* in West Norwood was removed from the SADPD following Reg 18 consultation.

## 2. Parties Involved

- London Borough of Lambeth
- London Borough of Croydon

## 3. Strategic Geography

This section sets out the factual position regarding cross-boundary strategic matters. The location and administrative boundaries of each borough are shown on Maps 2 and 3 below.

### **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 current version of the London Plan was published March 2021.

### **LB Lambeth**

Lambeth is an inner London borough with a northern boundary on the River Thames and situated mainly between the boroughs of Wandsworth and Southwark. It covers an area of approximately ten and a half square miles. It is surrounded by seven other London Boroughs - LB Southwark; LB Bromley; LB Croydon; LB Merton; LB Wandsworth; City of Westminster and City of London.

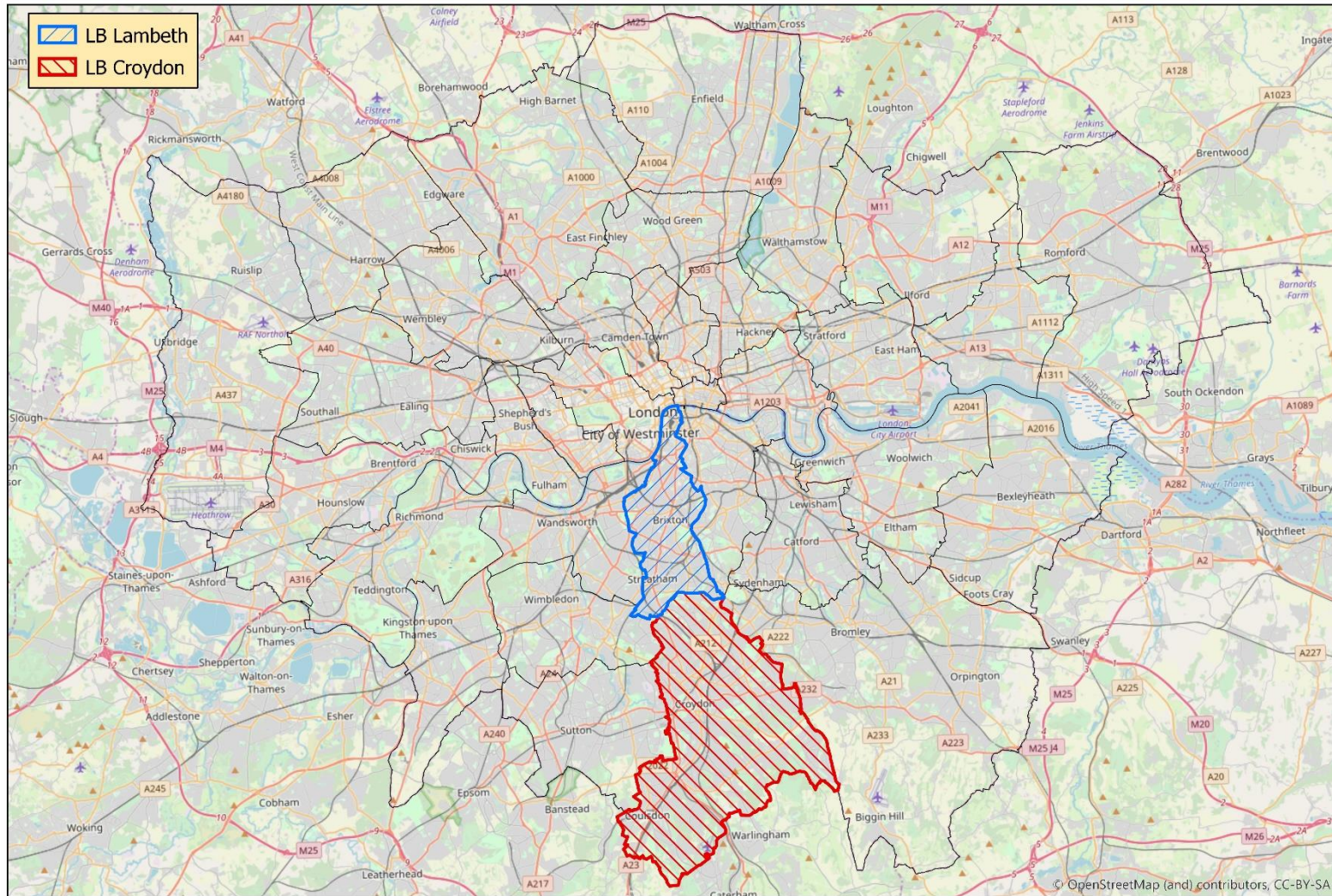
### **LB Croydon**

Croydon is an outer London borough, situated in south London. It bounds Lambeth to the south. It is bordered by Bromley to the east, and Sutton and Merton to the west. The land border between Croydon and Lambeth is approximately 4 kilometres long.

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



Map 2 – Boroughs involved in this Statement



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## 4. Strategic Matters

The adopted Lambeth Local Plan sets out the Strategy for development in the borough for the life of the plan (2020–2035). The SADPD will add site-specific policies to those already in the Lambeth Local Plan 2021: its principal objective is to unlock investment on these sites through the mechanism of site-specific planning policy. It sets out site allocation policies for 13 sites distributed across the borough.

Sites are included in this Draft SADPD for one or more of the following reasons:

- to set clear, site-specific parameters for the type and scale of development expected on a site, including the associated public benefits it should deliver;
- to address site-specific circumstances that may require a more tailored approach to that set out in borough-wide policies;
- to articulate the vision and potential that can be achieved through land assembly and/or a comprehensive approach to developing adjacent sites, particularly where these are in different ownerships;
- to encourage landowners to consider the potential for optimising the development capacity of their land and help deliver key place-making objectives;
- to signal some additional sites as appropriate for tall buildings, outside the locations already identified in the Local Plan; and
- to enable key strategic infrastructure to come forward in a timely way.

All have potential to deliver housing alongside commercial uses, apart from two that relate to hospital campuses. They include four sites in Waterloo, three in Brixton, one in Streatham, one in West Norwood/Tulse Hill, one in Kennington and three in Loughborough Junction.

LB Lambeth have been guided by a design-led optimisation of development capacity, as required by London Plan Policy D3. The indicative scale and massing has been informed by the site and its context and an analysis of the opportunities and constraints these present. Each site allocation policy includes a brief statement of the vision for the site, highlighting the opportunity presented by its redevelopment and its potential to contribute to strategic place-making. In addition, each site allocation policy, sets out the requirements and expectations for the site.

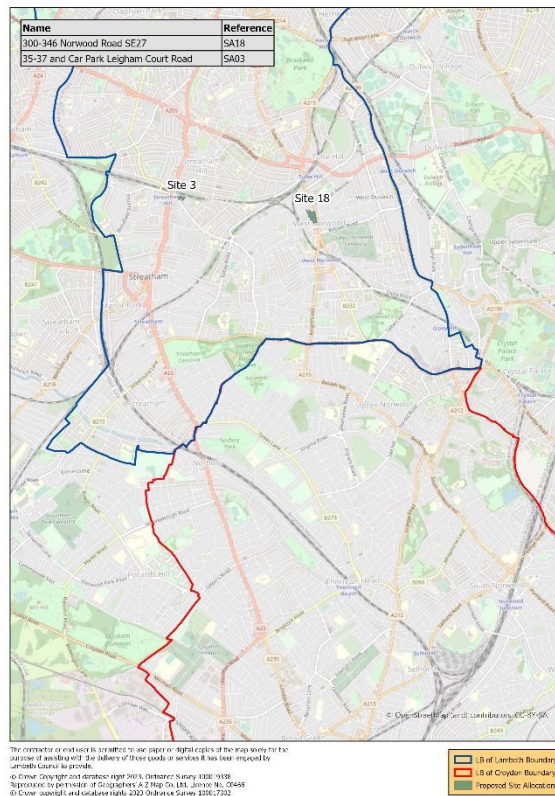
Officers from Croydon and Lambeth met in November 2022 to discuss the potential impact of the proposed site allocations set out in the draft SADPD. LB Croydon sought to be reassured that LB Lambeth had enough deliverable sites to meet the needs of the Borough set against their housing target in the London Plan 2021.

Lambeth's ability to meet its London Plan housing target was demonstrated through the examination of the Lambeth Local Plan 2021. However, the new site allocation policies will help to accelerate delivery of housing, including affordable housing, in the borough. This will contribute to maintaining the necessary pipeline of new housing and thereby help ensure housing delivery targets continue to be achieved. They will also enable the timely renewal and optimisation of social infrastructure and commercial floorspace.

Additionally, given the scale and location of the proposed site allocations (the site allocations in close proximity to Croydon are shown on Map 4 below), the parties agree that the proposed site allocations are unlikely to give rise to any cross-boundary issues of a strategic nature.



Map 4 – Proximity of draft site allocations to the border of Croydon



This SCG demonstrates that discussions have taken place to consider any strategic and cross-boundary issues that the draft SADPD may give rise to, and that both parties agree that no additional strategic issues are likely to arise as a result of this document (details set out in Annexe 1).

## 5. Governance Arrangements

This SCG has been informed by on-going engagement between the parties – as evidenced within Section 3 of this document which explains the joint working arrangements, alongside the schedule of engagement between the parties in Annexe 1.

These are live documents that are kept under review, 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 and Table 2) 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

LB Lambeth adopted its Local Plan in September 2021. As explained above, once adopted the SADPD and Lambeth Local Plan 2021 will form part of the development plan for the borough, alongside the South Bank & Waterloo Neighbourhood Plan, and the London Plan 2021. The key dates for this review are set out in Table 1 below.

The Croydon Local Plan was adopted in February 2018. Croydon has undertaken a review of its policies which will update the vision and strategy for Croydon’s growth up to 2039. This was published for consultation in 2022 and another round of consultation is expected to take place in early 2024. The borough is expecting to submit the Croydon Local Plan Review in 2024, with the key dates set out in Table 2 below.

Table 1: Current Development Plan Documents being produced by LB Lambeth

Dev Plan Document	Date of review	Reg 18 date	Anticipated Reg 19 date	Anticipated submission date
Site Allocations DPD	2021	Jan 2022	Spring 2024	Spring / Summer 2024


Table 2: Current Development Plan Documents being produced by LB Croydon

Dev Plan Document	Date of review	Reg 18 date	Reg 19 date	Anticipated submission date
Croydon Local Plan Review	2018	Nov 2019	Jan 2022 Jan 2024	2024

## 6. Signatures

Both parties agree that this statement is an accurate representation of matters discussed and issues agreed upon.

It is agreed that these discussions will inform both Lambeth’s SADPD and Croydon’s future plan-making activities and both parties will continue to work collaboratively in order to meet the duty to cooperate.

<p>Signed: </p> <p>Name: Rob Bristow</p> <p>Position: Director for Climate Change, Planning &amp; Transport</p> <p><b>London Borough of Lambeth</b></p> <p>Date 25 Jan 2024</p>	<p>Signed: </p> <p>Name: Steve Dennington</p> <p>Position: Service Head - Spatial Planning, Growth Zone and Regeneration</p> <p><b>London Borough of Croydon</b></p> <p>Date 19 Dec 2023</p>
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## Annexe 1. Schedule of engagement between the parties since last SCG

On 23 November 2022, policy officers from both parties met to discuss strategic cross border planning matters under the duty to cooperate and to develop this SCG for the SADPD. Lambeth officers provided a presentation to Croydon officers outlining the proposals, including an overview of the nearest site to the border. No issues were identified provided the allocations were deliverable and would meet the London Plan housing target, and it was agreed that Lambeth would lead on this SCG.

In addition, LB Lambeth and Croydon took part in the All London Borough Planning Officer meetings (Association of London Planning Officers) which takes place approximately every 6 months. These meetings provide an opportunity to discuss strategic planning issues in London.

## Annexe 2. December 2019 Statement of Common Ground

[Please visit this link to the Local Plan 2021 evidence base for the Statement of Common Ground between London Borough of Lambeth and the London Borough of Croydon December 2019](#)



Statement of Common Ground  
between the London Borough of  
Lambeth and London Borough of  
Merton

December 2023

# 1. Introduction

This Statement of Common Ground (SCG) has been prepared to demonstrate that Lambeth's Draft Site Allocations Development Plan Document (SADPD) is based on effective and continuous joint working on cross-boundary strategic matters, in accordance with the requirements of Section 33 A of the Planning and Compulsory Purchase Act, and paragraphs 24–27 of the National Planning Policy Framework.

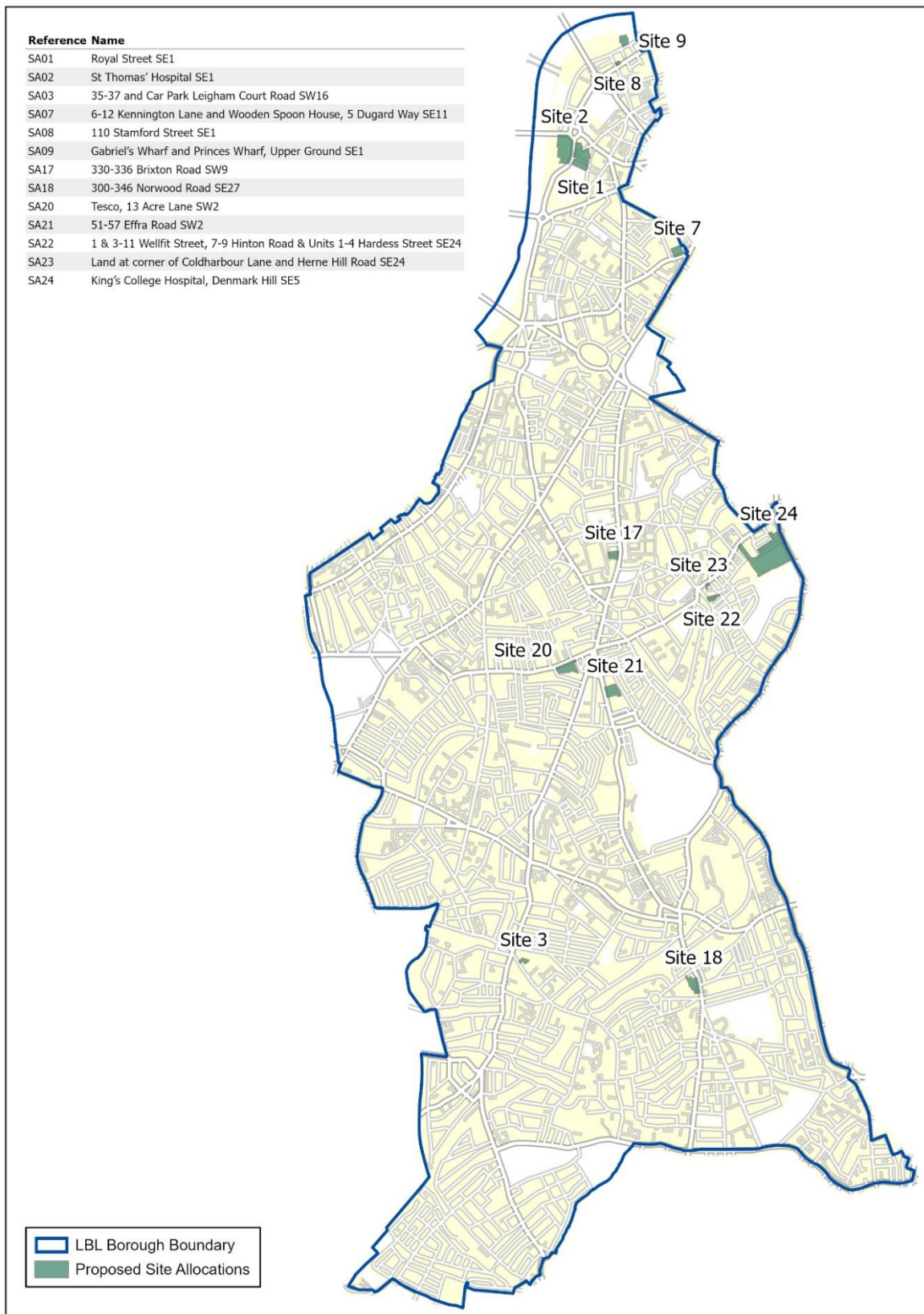
The draft SADPD is not a review of the existing Lambeth Local Plan 2021. Once adopted the SADPD and Lambeth Local Plan 2021 will form part of the development plan for the borough, alongside the South Bank & Waterloo Neighbourhood Plan, and the London Plan 2021.

The principal objective of the SADPD is to unlock investment through the mechanism of site-specific planning policy. It will support the implementation of wider Council strategies including the Borough Plan, Economic Resilience Strategy, Transport Strategy and Climate Action Plan. It will add site-specific policies to existing development plan policy. The Draft SADPD includes policies for thirteen sites, distributed across the borough, as shown on Map 1 below.

The purpose of the SCG is to document the cross-boundary matters being addressed and progress in cooperating to address these. This SCG supplements the existing SCG agreed between the boroughs in December 2019 (included in Annexe 2). This SCG confirms that continued engagement has taken place between the two parties, and that there is agreement that Lambeth's Draft SADPD is unlikely to create any additional strategic cross-border impacts within LB Merton. The two SCG are intended to be read together, with the arrangements made in the 2019 SCG continuing to have effect, alongside any future arrangements that may be agreed between the two parties.

Lambeth's Authority Monitoring Reports provide further details of how the Draft SADPD has been informed by ongoing engagement with key partners, including those that are not party to this SCG.

Map 1 – Draft site allocations\*



\*Please note, *Site 19 Knollys Yard* in West Norwood was removed from the SADPD following Reg 18 consultation.

## 2. Parties Involved

- London Borough of Lambeth
- London Borough of Merton

## 3. Strategic Geography

This section sets out the factual position regarding cross-boundary strategic matters. The location and administrative boundaries of each borough are shown on Maps 2 and 3 below.

### **The London Plan**

The London Plan 2021 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 current version of the London Plan was published March 2021.

### **LB Lambeth**

Lambeth is an inner London borough with a northern boundary on the River Thames and situated mainly between the boroughs of Wandsworth and Southwark. It covers an area of approximately ten and a half square miles. It is surrounded by seven other London Boroughs - LB Southwark; LB Bromley; LB Croydon; LB Merton; LB Wandsworth; City of Westminster and City of London.

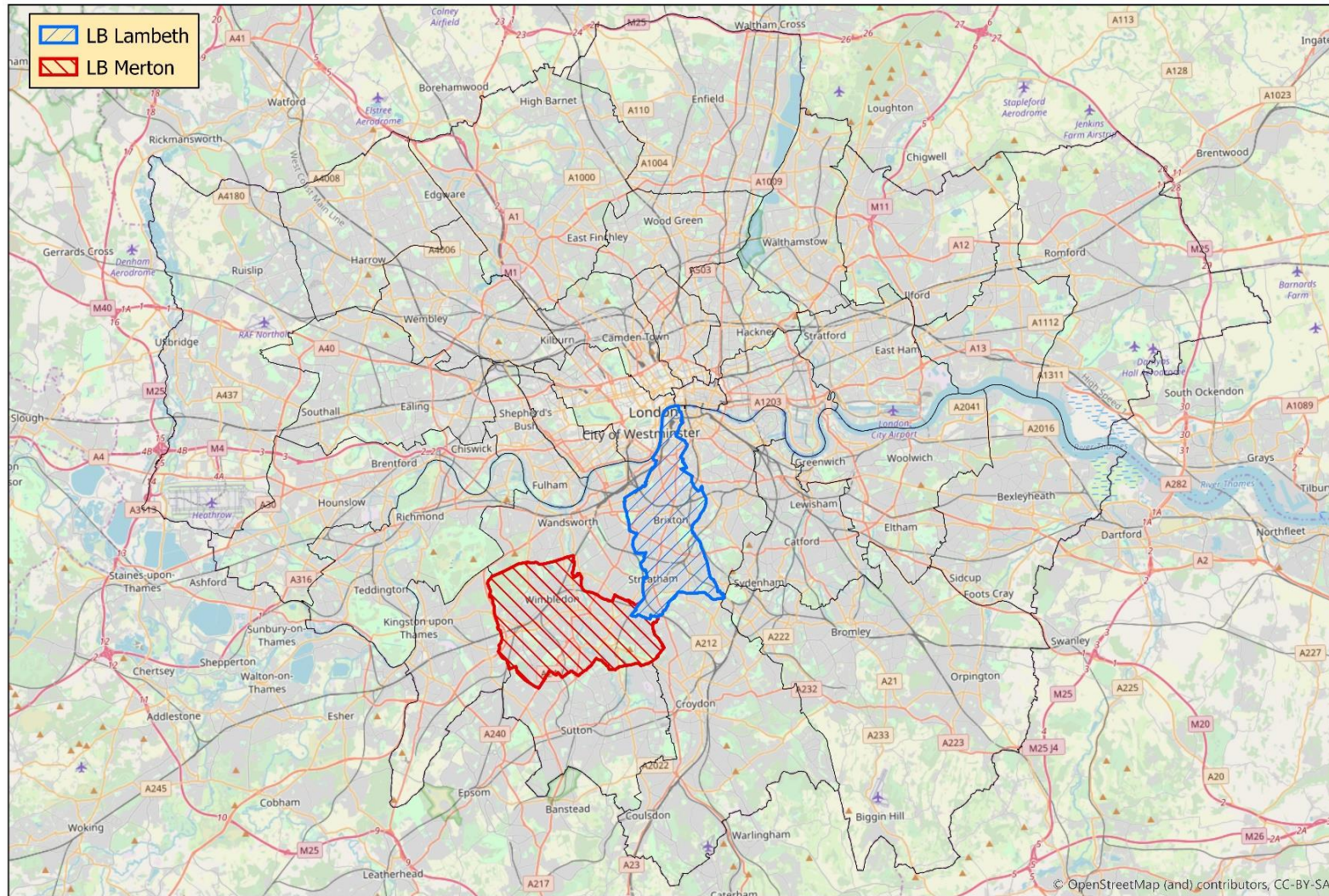
### **LB Merton**

Merton is an outer London borough, situated in southwest London, in the Wandle Valley. It covers an area of approximately 14.7 square miles and is surrounded by five other London Boroughs – Wandsworth, Lambeth, Croydon, Sutton and Kingston upon Thames. Merton shares a small border with Lambeth, to the southwest of Lambeth.

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



Map 2 – Boroughs involved in this Statement



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Map 3 – Length of border between Lambeth and Merton and key policy designations



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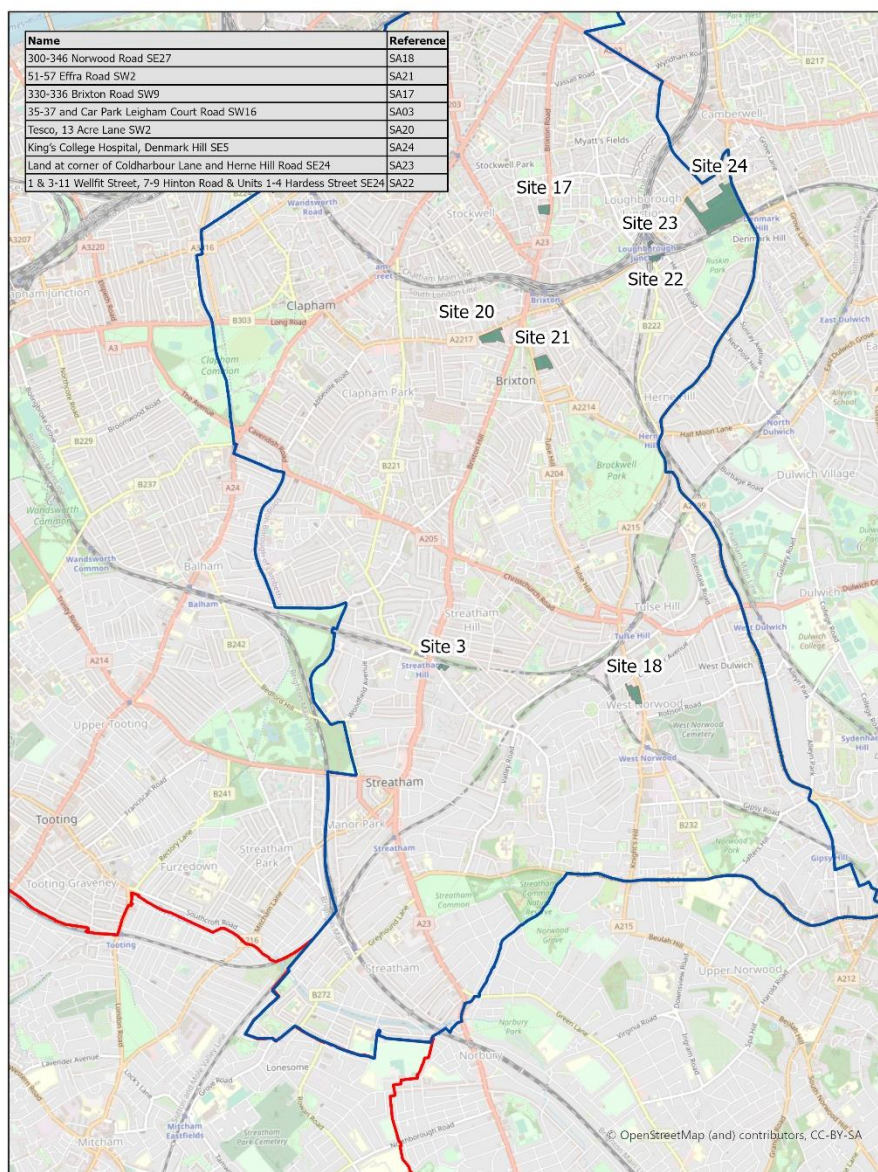


## 4. Strategic Matters

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

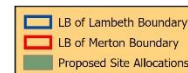
The parties met on 15<sup>th</sup> March 2023 to discuss the potential impact of the proposed site allocations set out in the draft SADPD. Given the scale and location of the proposed site allocations (the closest site allocations to Merton are shown on Map 4 below), the parties agree that the proposed site allocations are unlikely to give rise to any further cross-boundary issues of a strategic nature.

Map 4 – Proximity of draft site allocations to the border of Merton



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This SCG demonstrates that discussions have taken place to consider any strategic cross-boundary issues that the draft SADPD may give rise to, and that both parties agree that no additional strategic issues are likely to arise as a result of this document (details contained in Annexe 1).

Previously the parties have also engaged on duty to co-operate matters for Merton's emerging Local Plan (2019-2021) and prior to this for Lambeth's Local Plan 2021. This SCG is intended to supplement the existing agreement signed by the parties in January 2020 (see Annexe 2 for a copy of this document). The existing agreement considers a wide range of strategic matters and sets out how the parties intend to deal with these issues. These include:

- Housing, including gypsies and travellers;
- Health;
- Education;
- Telecommunications;
- Security;
- Transport;
- Air quality;
- Waste management;
- Water supply and wastewater;
- Flood risk;
- Energy;
- Green infrastructure;
- Climate change;
- Strategic and local views, and heritage, design and conservation; and
- Cultural infrastructure.

These existing arrangements are considered appropriate and proportionate for dealing with any potential strategic and cross-border issues that may arise and will continue to remain in place unless otherwise agreed.

## 5. Governance Arrangements

This SCG has been informed by on-going engagement between the parties – as evidenced within Section 3 of this document which explains the joint working arrangements, alongside the schedule of engagement between the parties in Appendix 1.

These are live documents that are kept under review, 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 and Table 2) 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

LB Lambeth adopted its Local Plan in September 2021. As explained above, once adopted the SADPD and Lambeth Local Plan 2021 will form part of the development plan for the borough, alongside the South Bank & Waterloo Neighbourhood Plan, and the London Plan 2021. The key dates for this review are set out in Table 1 below.



LB Merton’s current Local Plan consists of its Core Planning Strategy 2011, Site and Policies Plan and Policies Map 2014, Estates Local Plan 2018, and South London Waste Plan 2022. Work has nearly concluded on Merton’s new Local Plan with the key dates set out in Table 2 below. Once adopted it will supersede the Core Planning Strategy, Site and Policies Plan, and Policies Map.

Table 1: Current Development Plan Documents being produced by LB Lambeth

Dev Plan Document	Date of review	Reg 18 date	Anticipated Reg 19 date	Anticipated submission date
Site Allocations DPD	2021	Jan 2022	Spring 2024	Spring / Summer 2024

Table 2: Current Development Plan Documents being produced by LB Merton

Dev Plan Document	Date of review	Reg 18 date	Reg 19 date	Submission and examination dates
Local Plan Review	2017	Oct 2018 and Nov 2019	July 2021	Submitted December 2021. Examination Hearing sessions held in June and October 2022. Post Hearing letters received on the 6th April 2023 and Clarification 28th April 2023.

## 6. Signatures

Both parties agree that this SCG is an accurate representation of matters discussed and issues agreed upon.

It is agreed that these discussions will inform both the Lambeth SADPD and Merton’s future plan-making activities and both parties will continue to work collaboratively in order to meet the duty to cooperate.

<p>Signed: </p> <p>Name: Rob Bristow</p> <p>Position: Director for Climate Change, Planning and Transport</p> <p><b>London Borough of Lambeth</b></p> <p>Date: 25 Jan 2024</p>	<p></p> <p>Signed:</p> <p>Name: Tara Butler</p> <p>Position: Deputy Head of FutureMerton</p> <p><b>London Borough of Merton</b></p> <p>Date: 11 Jan 2024</p>
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## Annexe 1. Schedule of engagement between the parties since last SCG

In November 2020, the LB Merton was notified and invited to make representations on Lambeth's Draft Local Views Supplementary Planning Document (SPD). Having reviewed the document LB Merton did not make comments to LB Lambeth.

In February 2020, the LB Merton was notified and invited to comment on Lambeth's Draft Lambeth Design Code SPD. Having reviewed the document LB Merton did not make comments to LB Lambeth.

In January 2021, the LB Merton was notified that Kennington Oval and Vauxhall (KOV) Neighbourhood Forum had applied to be re-designated and invited them to make representations. LB Merton did not provide a written response as the proposed re-designation is several miles away from Merton's boundaries and no co-operation issues had arisen under the previous Forum designation.

In January 2022, the LB Merton was notified and invited to make comments on Lambeth's Draft SA DPD. Having reviewed the document and determined that the nearest site proposals to Merton (considering both new allocations and existing allocations carried forward) are approximately 3 miles away as a straight line distance as illustrated on Map 4 of this document. These sites are proposed for 80 homes at SA18 or the much smaller mixed use site at SA03. Therefore LB Merton chose not to make comments on Lambeth's draft Site Allocations DPD.

In July 2022, the LB Merton was notified and invited to make representations on Lambeth's Revised Draft Lambeth Design Guide SPD. Having reviewed the document LB Merton did not make comments to LB Lambeth.

On 15 March 2023, Lambeth and Merton officers met to consider in detail whether there were any cross boundary issues arising from Lambeth's Site Allocations DPD. Lambeth officers provided a presentation to Merton officers outlining the proposals including the nearest sites. Discussions included national policy (the consultation NPPF) and London-wide matters. Neither borough officers identified cross boundary co-operation issues.

Throughout 2023 – Lambeth and Merton officers have had ongoing email liaison.

In addition, All London Borough Planning Officer meetings (Association of London Planning Officers) took place on the following dates:

- 30 April 2020 (Policy Officers Sub Group)
- 15 September 2020 (Development Plans meeting)
- 25 November 2020
- 15 February 2021
- 10 June 2021 (Sub-Committee)
- 29 June 2021 (Dev Plan meeting)
- 16 September 2021 (Dev Plan meeting)
- 12 October 2021 (Dev Plan meeting)
- 16 December 2021
- 8 March 2022 (Dev Plan meeting)
- 30 June 2022
- 18 October 2022
- 8 November 2022 (Dev Plan meeting)
- 23 January 2023

## Annexe 2. December 2019 Statement of Common Ground

[Please visit this link to the Local Plan 2021 evidence base for the Statement of Common Ground between London Borough of Lambeth and the London Borough of Merton December 2019](#)

Statement of Common Ground  
between the London Borough of  
Lambeth and London Borough of  
Southwark

December 2023

## 1. Introduction

This Statement of Common Ground (SCG) has been prepared to demonstrate that Lambeth's *Draft Site Allocations Development Plan Document (SADPD)* is based on effective and continuous joint working on cross-boundary strategic matters, in accordance with the requirements of Section 33 A of the Planning and Compulsory Purchase Act, and paragraphs 24–27 of the National Planning Policy Framework.

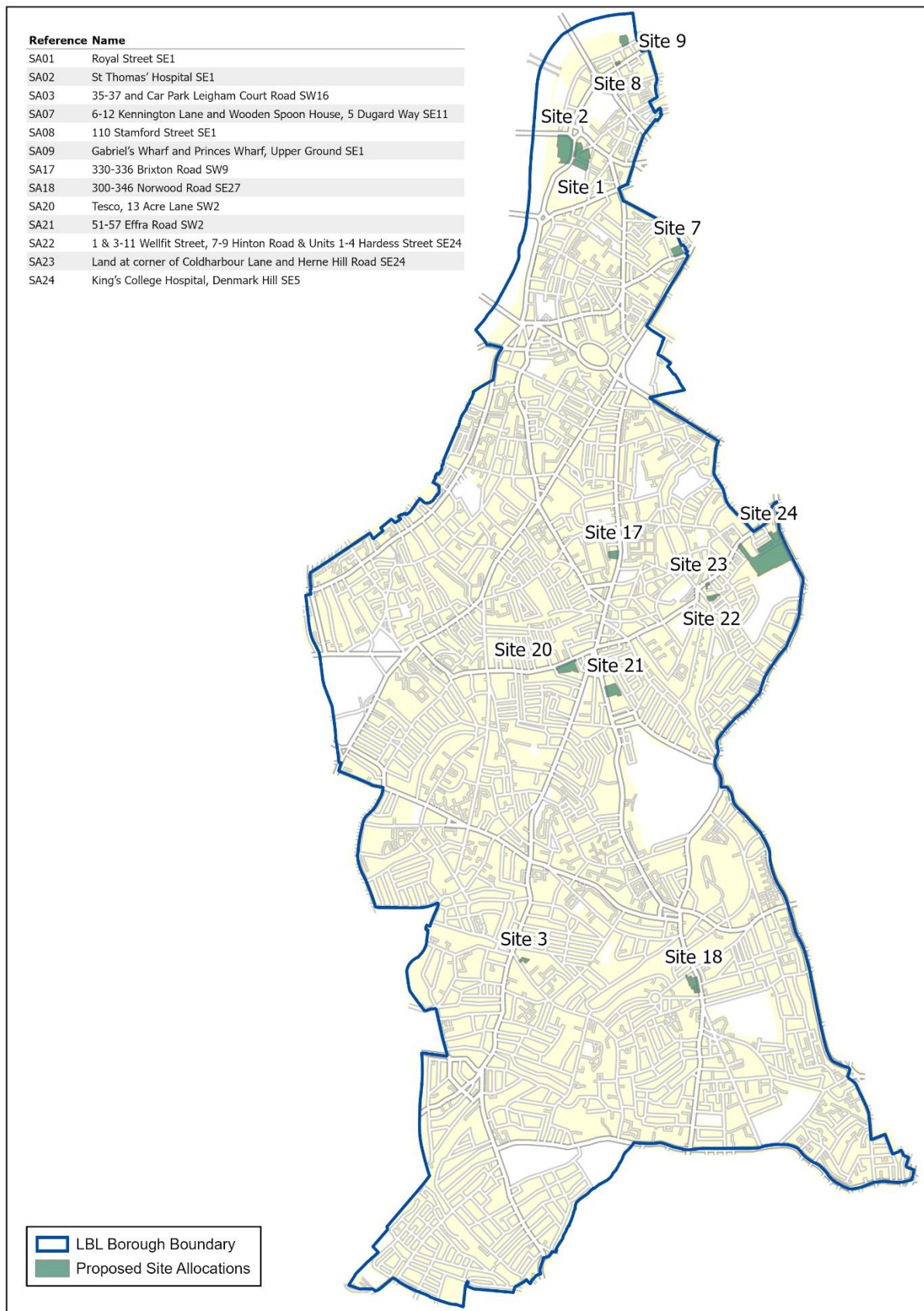
The draft SADPD is not a review of the existing Lambeth Local Plan 2021. Once adopted the SADPD and Lambeth Local Plan 2021 will form part of the development plan for the borough, alongside the South Bank & Waterloo Neighbourhood Plan, and the London Plan 2021.

The principal objective of the SADPD is to unlock investment through the mechanism of site-specific planning policy. It will support the implementation of wider Council strategies including the Borough Plan, Economic Resilience Strategy, Transport Strategy and Climate Action Plan. It will add site-specific policies to existing development plan policy. The Draft SADPD includes policies for thirteen sites, distributed across the borough as shown on Map 1 below.

The purpose of the SCG is to document the cross-boundary matters being addressed and progress in cooperating to address these. This SCG supplements the existing SCG agreed between the boroughs in December 2019 (included in Annexe 2). This SCG confirms that continued engagement has taken place between the two parties, and that there is agreement that Lambeth's Draft SADPD is unlikely to create any additional strategic cross-border impacts within LB Southwark. The two SCG are intended to be read together, with the arrangements made in the 2019 SCG continuing to have effect, alongside any future arrangements which are agreed between the two parties.

Lambeth's Authority Monitoring Reports provide further details of how the Draft SADPD has been informed by ongoing engagement with key partners, including those that are not party to this SCG.

Map 1 – Draft site allocations\*



\*Please note, *Site 19 Knollys Yard* in West Norwood was removed from the SADPD following Reg 18 consultation.



## 2. Parties Involved

- London Borough of Lambeth
- London Borough of Southwark

## 3. Strategic Geography

This section sets out the factual position regarding cross-boundary strategic matters. The location and administrative boundaries of each borough are shown on Maps 2 and 3 below.

### **The London Plan**

The London Plan 2021 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 current version of the London Plan was published March 2021.

### **LB Lambeth**

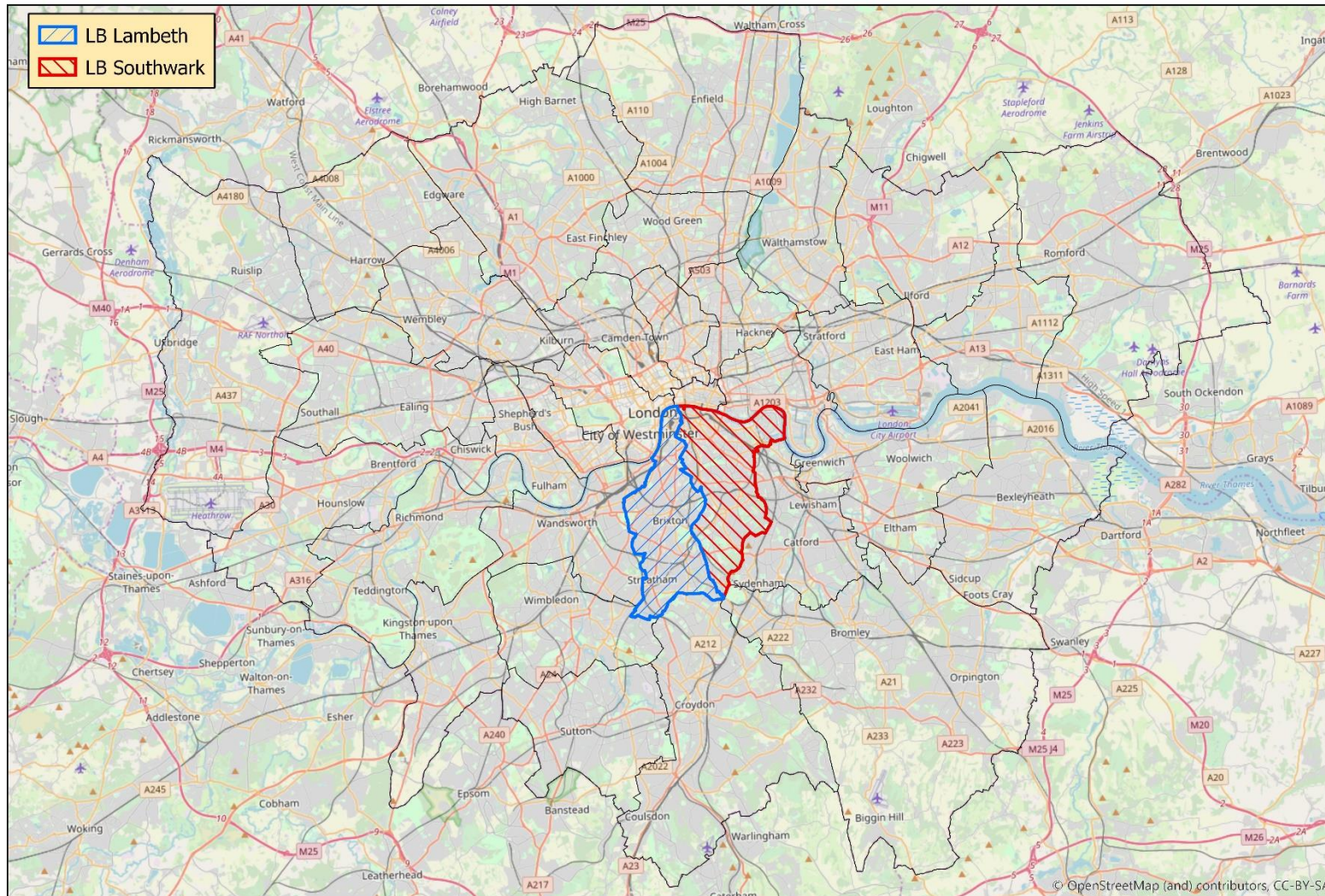
Lambeth is an inner London borough with a northern boundary on the River Thames and situated mainly between the boroughs of Wandsworth and Southwark. It covers an area of approximately ten and a half square miles. It is surrounded by seven other London Boroughs - LB Southwark; LB Bromley; LB Croydon; LB Merton; LB Wandsworth; City of Westminster and City of London.

### **LB Southwark**

Southwark is bordered by the London borough of Lewisham to the east, Bromley and Croydon to the south, Lambeth to the west, and the City of London and Tower Hamlets to the north. Lambeth lies immediately to the west of the Southwark. The land border between the two boroughs covers approximately 13 kilometres. This Statement includes the whole of Lambeth and the whole of Southwark. Lambeth and Southwark are not jointly part of any formal sub-regional groupings and therefore both parties have decided to enter into a bilateral statement of common ground (SCG).

This statement includes the whole of the LB Lambeth and the whole of LB Southwark.

Map 2 – Boroughs involved in this Statement

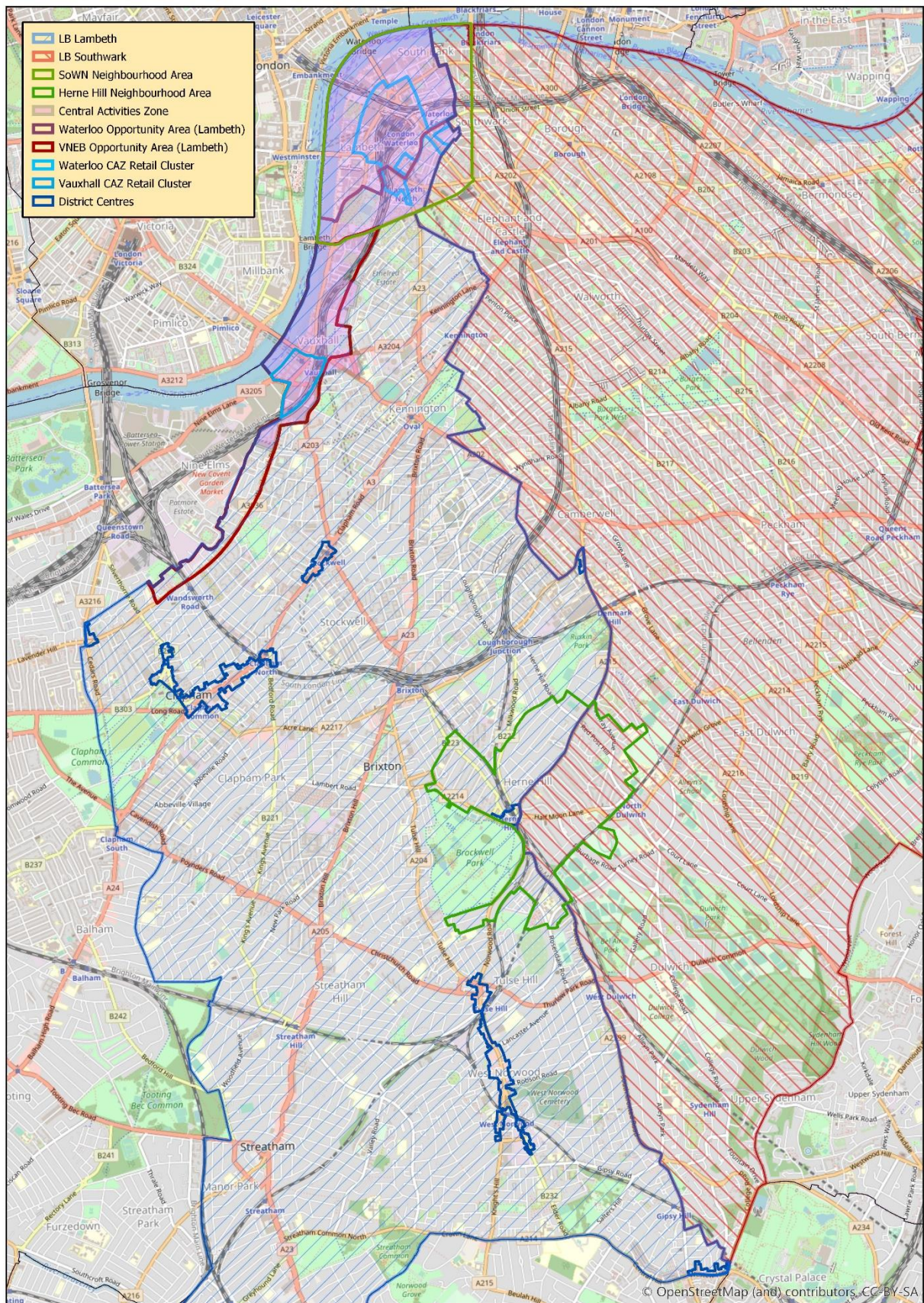


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Map 3 - Border between Lambeth and Southwark and key policy designations



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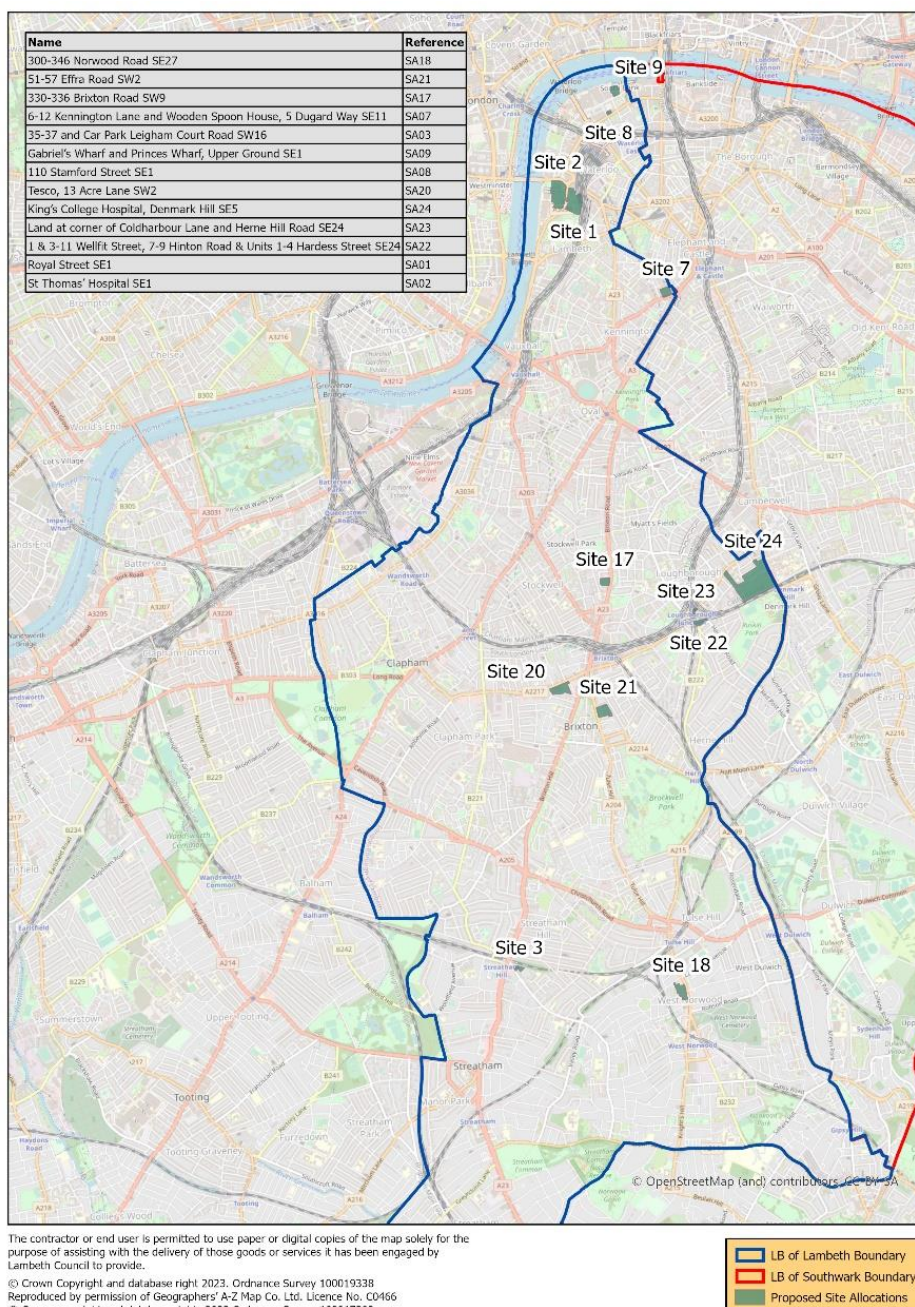


## 4. Strategic Matters

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

The parties have met on various occasions (details in annex 1) to discuss the potential impact of the proposed site allocations set out in the draft SADPD. Given the scale and location of the proposed site allocations (the closest site allocations to Southwark are shown on Map 4 below), the parties agree that the proposed site allocations are unlikely to give rise to any cross-boundary issues of a strategic nature.

*Map 4 – Proximity of draft site allocations to the border of Southwark*



### Nursing Home Need

Officers from LB Lambeth and LB Southwark discussed the need for nursing home places in the north of the borough during Duty to Cooperate meetings. This was in response to comments regarding the land use of SA9 (Gabriel's Wharf and Princes Wharf).

LB Southwark has confirmed that there is no need to allocate specific sites for nursing homes to meet its need. It has also confirmed that it would not expect LB Lambeth to accommodate any of its unmet need for nursing home places. Details of this matter are included within the briefing note included in Annexe 3.

### SA 7 – Kennington Lane

Officers from LB Lambeth and LB Southwark discussed the indicative height and massing for SA 7 – Kennington Lane during Duty to Cooperate meetings using views taken from the VuCity model. Consideration was given to the potential impact of the site allocation, with particular attention given to heritage and townscape. Officers from Southwark confirmed they had no concerns regarding the indicative height and massing for SA7.

### Existing cross-border arrangements

This SCG demonstrates that discussions have taken place to consider any strategic cross-boundary issues that the draft SADPD may give rise to, and that both parties agree that no additional strategic issues are likely to arise as a result of this document (details set out in Annexe 1).

This Statement of Common Ground is intended to supplement the existing agreement signed by the parties in December 2019 (see Annexe 2 for a copy of this document). The existing agreement considers a wide range of strategic matters and sets out how the parties intend to deal with these issues. These include:

- Neighbourhood planning;
- Housing need;
- Employment, retail, leisure, and other commercial development;
- Health;
- Education;
- Telecommunications;
- Security;
- Transport;
- Air quality;
- Waste management;
- Flood risk;
- Green infrastructure;
- Climate change;
- River Thames;
- Strategic and local views, and heritage, design and conservation; and
- Cultural infrastructure.

These existing arrangements are considered appropriate and proportionate for dealing with any potential strategic and cross-border issues that may arise and will continue to remain in place unless otherwise agreed.

## 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 Annexe 1.

These are live documents and will be kept under review, 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

LB Lambeth adopted its Local Plan in September 2021. As explained above, once adopted the SADPD and Lambeth Local Plan 2021 will form part of the development plan for the borough, alongside the South Bank & Waterloo Neighbourhood Plan, and the London Plan 2021. The key dates for this review are set out in Table 1 below.

LB Southwark adopted its Local Plan in February 2022. The borough is currently drafting a number of SPDs which intends to consult on shortly.

*Table 1: Current Development Plan Documents being produced by LB Lambeth*

<b>Dev Plan Document</b>	<b>Date of review</b>	<b>Reg 18 date</b>	<b>Anticipated Reg 19 date</b>	<b>Anticipated submission date</b>
Site Allocations DPD	2021	Jan 2022	Spring 2024	Spring / Summer 2024

*Table 2: Current Development Plan Documents being produced by LB Southwark*

<b>Dev Plan Document</b>	<b>Anticipated (or actual) publication for comment</b>	<b>Anticipated adoption date</b>
Affordable Housing and Viability SPD	Summer 2024	December 2024
Section 106 and CIL SPD	Summer 2024	December 2024
Householder SPD	Autumn 2024	Winter 2024/25
Environment and Climate Emergency SPD	Autumn 2024	Winter 2024/25
Affordable Workspace and Commercial SPD	Winter 2024/25	Spring 2025



## 6. Signatures

Both parties agree that this statement is an accurate representation of matters discussed and issues agreed upon.

It is agreed that these discussions will inform both the Lambeth SADPD and Southwark's future plan-making activities and both parties will continue to work collaboratively in order to meet the duty to cooperate.

<p>Signed: <u>Rob Bristow</u></p> <p>Name: Rob Bristow</p> <p>Position: Director for Climate Change, Planning and Transport</p> <p><b><i>London Borough of Lambeth</i></b></p> <p>Date: 25/01/2024</p>	<p>Signed: <u>Juliet Seymour</u></p> <p>Name: Juliet Seymour</p> <p>Position: Director of Planning</p> <p><b><i>London Borough of Southwark</i></b></p> <p>Date: 12/01/2024</p>
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## Annexe 1. Schedule of engagement between the parties

In November 2020, LB Southwark was notified and invited to make representations on Lambeth's Draft Local Views Supplementary Planning Document (SPD). No response was received.

In February 2020, LB Southwark was notified and invited to comment on Lambeth's Draft Lambeth Design Code SPD. No response was received.

In January 2021, LB Southwark was notified that Kennington Oval and Vauxhall (KOV) Neighbourhood Forum had applied to be re-designated and invited them to make representations. No response was received.

In January 2022, LB Southwark was notified and invited to make comments on Lambeth's Draft SA DPD. No representations were received.

In July 2022, LB Southwark was notified and invited to make representations on Lambeth's Revised Draft Lambeth Design Guide SPD.

On 29 November 2022, officers from Lambeth met with their counterparts at the City of London to discuss the Site Allocations DPD. Lambeth officers discussed the evolution of the modelling and the refinements they intended to make following Reg 18 consultation to the draft SADPD and the accompanying evidence base documents. The structure and content of this SCG was also discussed.

On 13 December 2022, LB Southwark submitted representations on the Lambeth SADPD under the duty to cooperate. No representations were received by Southwark at the time.

On 13 April 2023, officers from Lambeth met with their counterparts at the LB Southwark to discuss the Site Allocations DPD. Lambeth officers discussed the evolution of the modelling and the refinements they intended to make following Reg 18 consultation to the draft SADPD and the accompanying evidence base documents.

On 13 November, officers from Lambeth met with their counterparts at the LB Southwark to discuss the Site Allocations DPD. Officers discussed the indicative modelling for SA7. The structure and content of this SCG was also agreed.

In addition, All London Borough Planning Officer meetings (Association of London Planning Officers) took place on the following dates:

- 30 April 2020 (Policy Officers Sub Group)
- 15 September 2020 (Development Plans meeting)
- 25 November 2020
- 15 February 2021
- 10 June 2021 (Sub-Committee)
- 29 June 2021 (Dev Plan meeting)
- 16 September 2021 (Dev Plan meeting)
- 12 October 2021 (Dev Plan meeting)
- 16 December 2021
- 8 March 2022 (Dev Plan meeting)
- 30 June 2022
- 18 October 2022
- 8 November 2022 (Dev Plan meeting)
- 23 January 2023

## Annexe 2. Dec 2019 Statement of Common Ground

[Please visit this link to the Local Plan 2021 evidence base for the Statement of Common Ground between London Borough of Lambeth and the London Borough of Southwark December 2019](#)

## Annexe 3. Duty to Cooperate statement on Nursing Home Need in Southwark

## Draft Duty to Cooperate Statement on Gabriel's Wharf and Princes Wharf

**Context:** Under the Duty to Cooperate, Lambeth Council have requested a statement from Southwark Council. This is to agree that there is no housing need for a nursing home on one of their draft site allocations that is close to the Southwark boundary and the Borough and Bankside ward. London groups are utilised to work through cross borough issues, including need. Southwark can not require Lambeth to provide for Southwark's housing need.

### Site 9- Gabriel's Wharf and Princes Wharf



Context Map of the draft site allocation (Site 9)

### Land-use context:

Lambeth has designated this site 9 – *ITV Centre and Gabriel's Wharf, Upper Ground SE1* as one suitable for mixed-used development in the adopted 2021 Local Plan. The allocation is also being updated in the *Lambeth Site Allocations Development Plan Document (Regulation 18 Consultation Draft January 2022)*. This document provides additional information and further reiterates the suitability of the site for mixed-use development.

The site is owned by Coin Street Community Builders who wish to bring forward a planning application for a nursing home (Use Class C2) on this site. Lambeth Council do not agree that a nursing home is needed on the site and that the owner has not supplied evidence to support their claim that a nursing home is needed.

Lambeth 's adopted Local Plan (2021) and emerging draft site allocation document (2022) both seek to see this site redeveloped as a mixed-use development with cultural and office floor-space at the ground floor and residential above. This would include new public realm, terrace/piazza, active frontages, improved pedestrian routes and urban greening.

Lambeth have stated that the redevelopment of this site would provide the opportunity to contribute positively to the nearby opportunity areas, CAZs, townscape and Strategic Cultural Areas.

### Site Spatial Designations:

#### Southwark Plan 2022 Policies:

- Close to the Bankside Neighbourhood Area
- Close to several Southwark site allocations:
  - 1-5 Paris Garden and 16-19 Hatfields
  - Land between Paris Gardens, Colombo Street, Blackfriars Road and Stamford Street
  - Land enclosed by Colombo Street, Meymott Street and Blackfriars Road
  - Ludgate House & Sampson House, 64 Hopton Street
- Close to Bankside and Borough District Town Centre
- Close to River Thames Policy Area
- Close to Old Barge House Alley Conservation area
- Close to North Southwark and Roman Roads Archaeological priority area
- In Central Activities Zone
- Close to South Bank Strategic Cultural Quarter
- Close to Air Quality Management Area
- Close to Bankside, Borough and London Bridge Opportunity Area

### Demographic Data - Borough and Bankside ward

Lambeth draft site allocation Gabriel's Wharf and Princes Wharf (Site 9) is located close to the Southwark boundary and the ward of Borough and Bankside.

#### All ages- 11,108

Age 70	37
Age 75	27
Age 80	21
Age 85	11
Age 90+	40

Figure 1 Borough and Bankside mid 2020 ward population estimate ONS



## **Establishing the Need for nursing home provision in Southwark:**

### **Strategic Housing Market Assessment Update- September 2019**

#### The housing requirements of specific groups- Older households (paragraphs 25-29)

*A 79% increase in the population of Southwark aged 65 or more is forecast by 2039; this incorporates a 92% increase in those over 75 and 87% growth in those over 85. The number of those aged over 65 is projected to reach nearly 48,000 over the period, comprising 13% of the Southwark population.*

*There are currently around 1,927 units of specialist elderly accommodation in Southwark.*

*An additional 780 units will be required to meet need by 2029; of these some 559 (72%) should be sheltered and 116 (14%) extra care.*

*As regard care homes and dementia provision, the number of people over 65 with dementia is forecast to reach 2,369 by 2030. Southwark has seen an overall reduction of 46% of care home and dementia places since 2011 - an additional or improved 867 care beds are required by 2029.*

*In terms of the overall proportion and number of older people in the population, over 65s are expected to increase from 26,722 to 47,813, marking an increase from 8.2% to 12.7% of the population. Over 75s are expected to make up 5.9% and over 85s to make up 1.7% of the Southwark population by 2039.*

*When looking at supply of (and demand for) specialist accommodation for older people, this SHMA primarily focusses on the forms of accommodation that would be normally termed 'housing', including sheltered, enhanced sheltered, and extra care. It therefore excludes accommodation that primarily caters for those with care, nursing and medical needs – residential and nursing care.*

*Nonetheless, it should be noted that the authority is concerned about the reduction in the numbers of nursing care beds, which have fallen by 252 units since 2011 (a 46% reduction).*

*It must be acknowledged that the need for residential care may be reduced if there is provision of appropriate extra care sheltered housing. We also note that both residential and nursing care very frequently involve accommodating people from one area in another. The reasons for this vary – probably a mixture of choice and the market for the provision of such accommodation, but this is why some of the assumptions about accommodation involving care being provided primarily for the residents of the borough in which it is situated are not applicable.*

### **Southwark Plan 2022**

The Southwark Plan 2022 was adopted in February 2022 and does not set a target for older persons housing and older persons housing are a requirement of our site allocations. The London Plan (2021) (Policy H13 specialist older persons housing, table 4.3) sets an annual borough benchmark for specialist older persons housing 2017-2029 for Southwark of 65 units per annum.

This is a benchmark rather than a target and covers a broad range of types of housing that can be used by older people, within the C2 and C3 use classes as is made clear in the supporting text to the London Plan Policy H13.

Our Strategic Housing Market Assessment (2019) identifies need for older people housing of 780 units required by 2029 which is based on the London Plan evidence base: Assessing potential demand for older persons housing in London, GLA / 3 Dragons / Celandine, 2014 (proportions) and 2017 update (base figures).

The GLA studies do not breakdown their requirement into different types of accommodation for older people. Within the SHMA it uses the proportions calculated using the Housing Learning and Information Network's SHOP model to provide the breakdown of types accommodation required:

- 559 (72%) should be sheltered (rent)
- 18 (2%) sheltered (owned)
- 49 (6%) enhanced sheltered (rent)
- 38 (5%) enhanced sheltered (owned)
- 116 (14%) extra care.

The Housing Strategy (December 2020) has a thread throughout the four principles reinforcing our commitment to being an age-friendly and dementia friendly borough providing homes and neighbourhoods that will support people to live long and healthy happy lives in their own community (Pg 10).

- Principle 1 (Pg 12) - we will review the demand for all forms of older people's housing and develop a joined up approach for older people, including ways to better support older people to downsize.
- Principle 3 (Pg 21) - we commit to conducting a review of the demand for older people's housing and the council providing specific housing or facilities to meet particular needs.
- Delivering additional extra/flexi care housing for older people, including a centre for people living with dementia and associated complex needs.
- Delivering an Older People's Hub for people with social care needs, co-located on new extra care housing provision at Cator Street 2 development.

Work on delivering the commitments in Principles 1 and 3 in the Housing Strategy is undergoing and a Board has been set up to plan for care home provision in the borough. The confirmed pipeline in the Borough comprises:

- 50 extra care units - Cator Street
- 99 residential nursing care – Burgess Park, Pickton Street, Camberwell (opened January 2022)
- 54 extra care homes – Notting Hill, Aylesbury

In addition, general housing can accommodate the needs of older people. We require a range of unit sizes to be provided in developments under Policy P2 - new family homes, where the smaller 1 or 2 bedroom units can be accommodated by older people who would like to downsize.

The Southwark Plan 2022 P7 (Housing for Older People) states that development of new specialist housing for older people must provide conventional social rented and intermediate housing in accordance with Policy P1 (this is our priority for the delivery of new homes due to

the shortage of affordable homes) or specialist affordable accommodation for older people, subject to need.

P1 in the Southwark Plan 2022 states that development that creates 10 or more homes must provide the maximum viable amount of social rented and intermediate homes. The minimum amount should be 35%, as set out in Figure 2 below, subject to viability

Market Housing	Social rented and intermediate housing	
Up to 65%	A minimum of 35%	
	Social rented housing	Intermediate housing
	A minimum of 25%*	A minimum of 10%*

Figure 2 Social Rented and Intermediate Housing Requirement

### Southwark Adult Social Care Assessment:

*Southwark currently has a 120 bed nursing home at Tower Bridge and do not have a need for another, particularly considering plans to deliver new nursing homes. Southwark will soon have two dual registered Nursing/Residential care homes in Bermondsey (48 Beds) and Rotherhithe (64 Beds). This is in addition to another Nursing Home recently opened at Burgess Park. (98 Beds). Southwark do not need a nursing home in the north of the borough.*

### Planning Assessment:

While there is a need for nursing homes in Southwark, this need is felt more sharply in the South of the Borough. Southwark Council has recently delivered one new nursing home in Burgess Park and are in the process of delivering two new nursing homes in Bermondsey and Rotherhithe, respectively. In addition, Southwark recognises the value of the site in delivering multiple benefits as a mixed-use development due to its location close to Southwark's Central Activities Zone, Bankside and Borough District Town Centre and Bankside, Borough and London Bridge Opportunity Area. The recently adopted Southwark Plan supports older people's housing. However, there was no need to allocate specific sites for this purpose. Therefore, there is not a requirement for Lambeth sites to provide any of Southwark's need.

Statement of Common Ground  
between the London Borough of  
Lambeth and London Borough of  
Wandsworth

December 2023

## 1. Introduction

This Statement of Common Ground (SCG) has been prepared to demonstrate that Lambeth's Draft Site Allocations Development Plan Document (SADPD) is based on effective and continuous joint working on cross-boundary strategic matters, in accordance with the requirements of Section 33 A of the Planning and Compulsory Purchase Act, and paragraphs 24–27 of the National Planning Policy Framework.

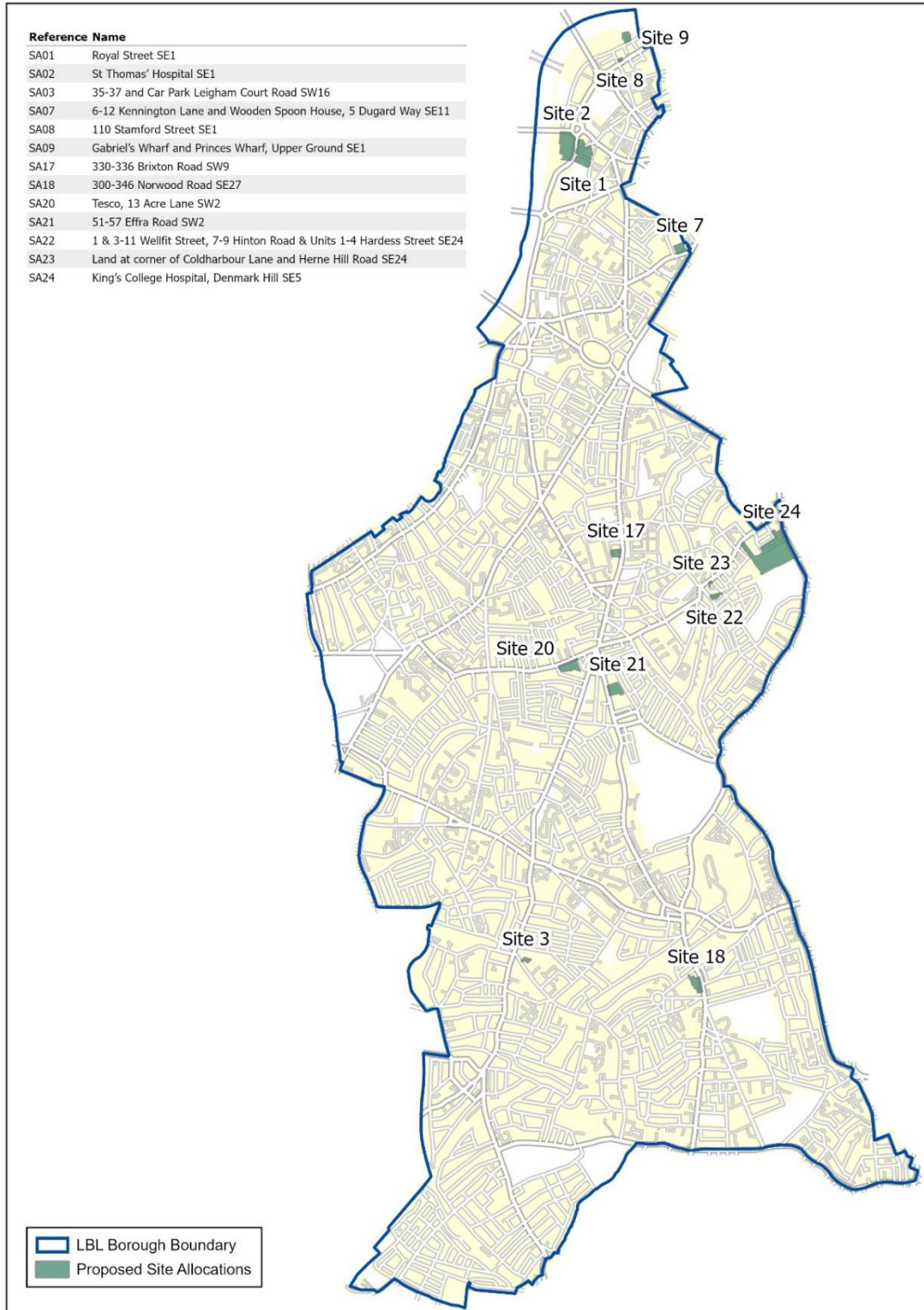
The draft SADPD is not a review of the existing Lambeth Local Plan 2021. Once adopted the SADPD and Lambeth Local Plan 2021 will form part of the development plan for the borough, alongside the South Bank & Waterloo Neighbourhood Plan, and the London Plan 2021.

The principal objective of the SADPD is to unlock investment through the mechanism of site-specific planning policy. It will support the implementation of wider Council strategies including the Borough Plan, Economic Resilience Strategy, Transport Strategy and Climate Action Plan. It will add site-specific policies to existing development plan policy. The Draft SADPD includes policies for thirteen sites, distributed across the borough as shown on Map 1 below.

The purpose of the SCG is to document the cross-boundary matters being addressed and progress in cooperating to address these. This SCG supplements the existing SCG agreed between the boroughs in December 2019 (included in Annexe 2), and the joint SCG between London Borough of Wandsworth and London Boroughs of Hammersmith and Fulham, Lambeth, Merton, Richmond, Westminster City Council and the Royal Boroughs of Kensington and Chelsea and Kingston Upon Thames that was signed on 8 September 2022 (included in Annexe 3). This SCG confirms that continued engagement has taken place between the two parties, and that there is agreement that Lambeth's Draft SADPD is unlikely to create any additional strategic cross-border impacts within LB Wandsworth. The three SCG are intended to be read together, with the arrangements made in the 2019 and 2022 SCGs continuing to have effect, alongside any future arrangements that may be agreed between the two parties.

Lambeth's Authority Monitoring Reports provide further details of how the Draft SADPD has been informed by ongoing engagement with key partners, including those that are not party to this SCG.

Map 1 – Draft site allocations\*



\*Please note, *Site 19 Knollys Yard* in West Norwood was removed from the SADPD following Reg 18 consultation.



## 2. Parties Involved

- London Borough of Lambeth
- London Borough of Wandsworth

## 3. Strategic Geography

This section sets out the factual position regarding cross-boundary strategic matters. The location and administrative boundaries of each borough are shown on Maps 2 and 3 below.

### **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 current version of the London Plan was published March 2021.

### **LB Lambeth**

Lambeth is an inner London borough with a northern boundary on the River Thames and situated mainly between the boroughs of Wandsworth and Southwark. It covers an area of approximately ten and a half square miles. It is surrounded by seven other London Boroughs - LB Southwark; LB Bromley; LB Croydon; LB Merton; LB Wandsworth; City of Westminster and City of London.

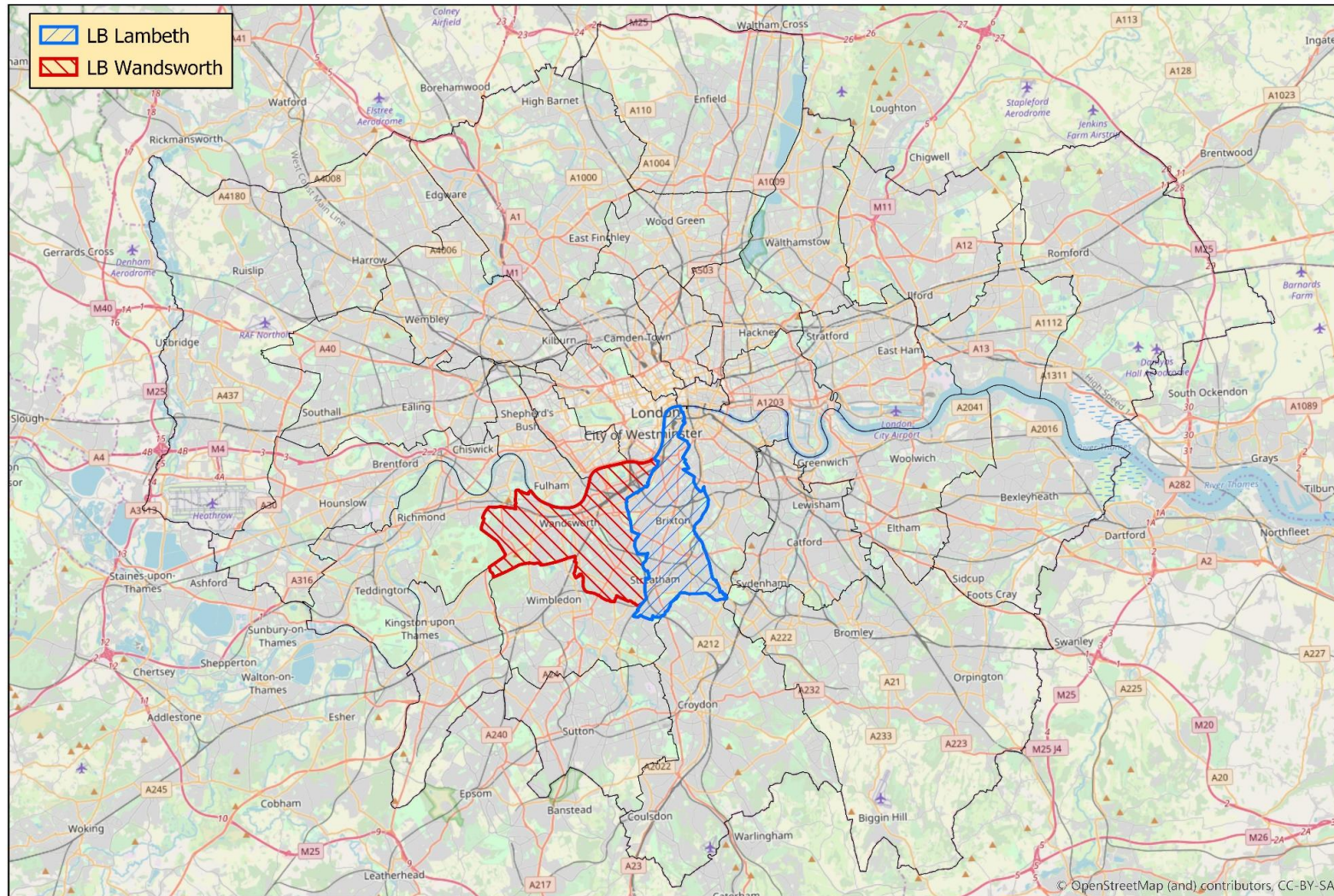
### **LB Wandsworth**

Wandsworth is an inner London borough with a northern boundary on the River Thames. It bounds Lambeth to the east and is also bounded by LB Merton (to the south) and RB Kingston (to the southwest) and Richmond (to the west).

This statement includes the whole of the LB Lambeth and the whole of LB Wandsworth.

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Map 2 – Map of the parties involved in this Statement

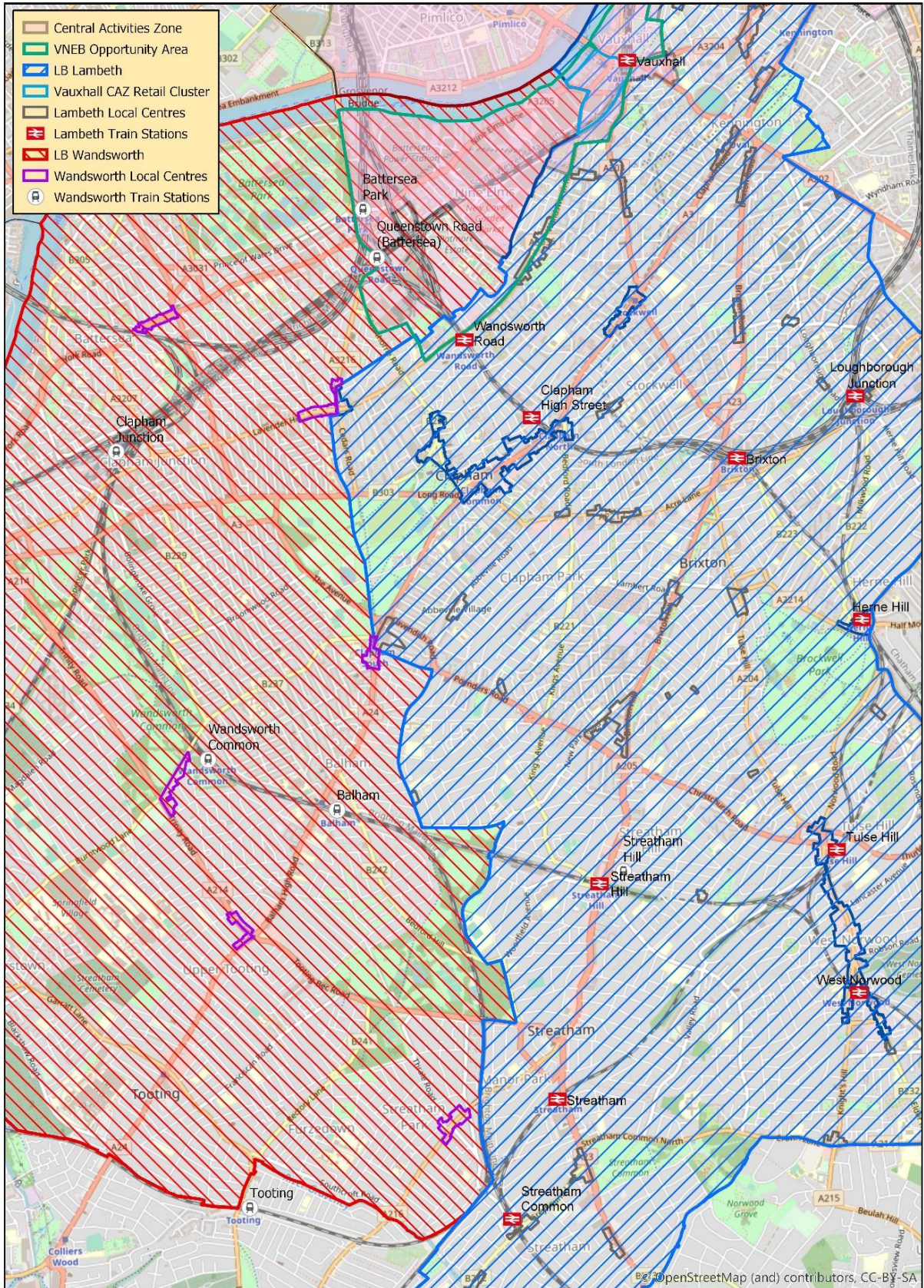


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Map 3 – Border between the LB Lambeth and LB Wandsworth and key policy designations



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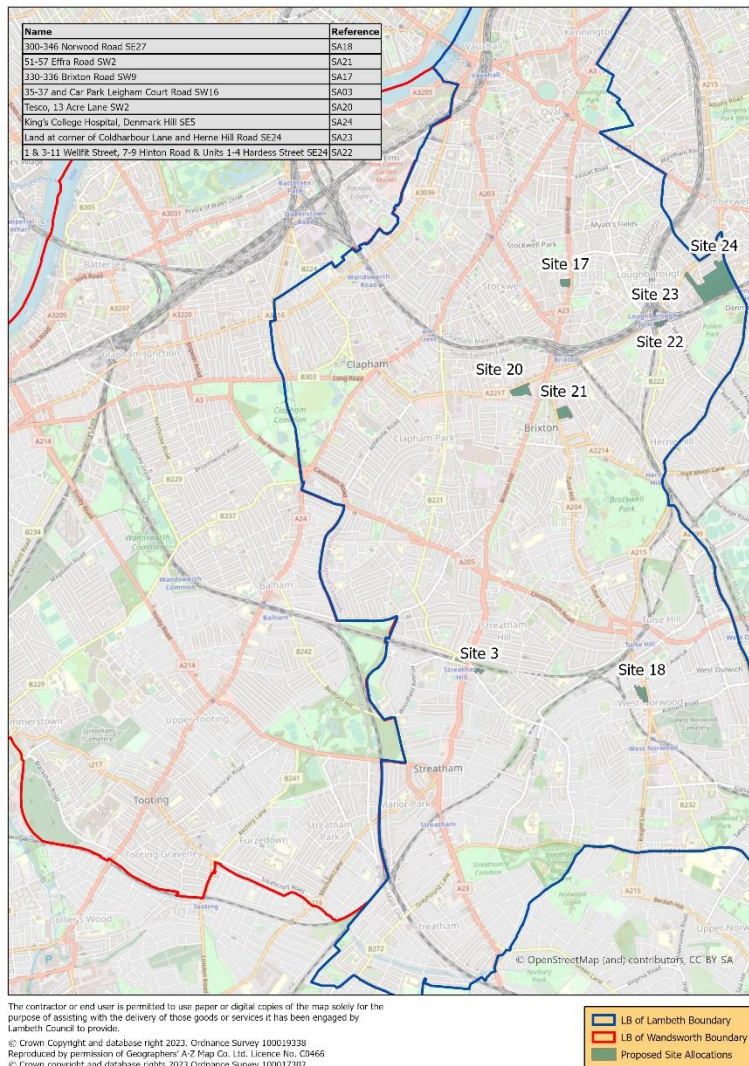


## 4. Strategic Matters

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

The parties met in December 2022 to discuss the potential impact of the proposed site allocations set out in the draft SADPD. Given the scale and location of the proposed site allocations (the closest site allocation to Wandsworth is shown on Map 4 below), the parties agree that the proposed site allocations are unlikely to give rise to any cross-boundary issues of a strategic nature.

Map 4 – Proximity of Lambeth’s draft site allocations to the border of Wandsworth



This SCG demonstrates that discussions have taken place to consider any strategic cross-boundary issues that the draft SADPD may give rise to, and that both parties agree that no additional strategic issues are likely to arise as a result of this document (details set out in Annexe 1).

This SCG is intended to supplement the existing agreement agreed by the parties in December 2019 and September 2022 (see Annexe 2 and 3 for copies of these documents). The existing agreement

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considers a wide range of strategic matters and sets out how the parties intend to deal with these issues. These include:

- Neighbourhood planning;
- Housing;
- Employment, town centres and retail, leisure and other commercial development;
- Central Activities Zone;
- Vauxhall, Nine Elms, Battersea Opportunity Area;
- Health;
- Education;
- Telecommunications;
- Security;
- Transport;
- Air quality;
- Waste management;
- Water supply and wastewater;
- Flood risk;
- Energy;
- Green infrastructure;
- Climate change;
- River Thames;
- Tall buildings;
- Strategic and local views, heritage, design, and conservation; and
- Culture and infrastructure.

These existing arrangements are considered appropriate and proportionate for dealing with any potential strategic and cross-border issues that may arise and will continue to remain in place unless otherwise agreed.

## 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 Annexe 1.

These are live documents and will be kept under review, 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 and Table 2 below) 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

LB Lambeth adopted its Local Plan in September 2021. As explained above, once adopted the SADPD and Lambeth Local Plan 2021 will form part of the development plan for the borough, alongside the South Bank & Waterloo Neighbourhood Plan, and the London Plan 2021. The key dates for this review are set out in Table 1 below.



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LB Wandsworth adopted its current Local Plan in 2016. Work began on a review of its local plan in 2018. Wandsworth's emerging local plan underwent examination in public in 2022, with the Main Modifications consulted upon in February / March 2023. The local plan is expected to be adopted in 2023. The key dates are set out in Table 2 below.

Table 1: Current Development Plan Documents being produced by LB Lambeth

Dev Plan Document	Date of review	Reg 18 date	Anticipated Reg 19 date	Anticipated submission date
Site Allocations DPD	2021	Jan 2022	Spring 2024	Spring / Summer 2024

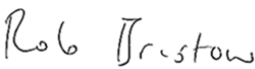

Table 2: Current Development Plan Documents being produced by LB Wandsworth

Dev Plan Document	Date of review	Reg 19 date	Consultations Main Mods	Submission date
Local Plan Review	2018	Jan 2021	Jan 2022	29 April 2022

## 6. Signatures

Both parties agree that this statement is an accurate representation of matters discussed and issues agreed upon.

It is agreed that these discussions will inform both the Lambeth's SADPD and Wandsworth's future plan-making activities and both parties will continue to work collaboratively in order to meet the duty to cooperate.

<p>Signed: </p> <p>Name: Rob Bristow</p> <p>Position: Director for Climate Change, Planning, and Transport</p> <p><b>London Borough of Lambeth</b></p> <p>Date: 25 January 2024</p>	<p>Signed: </p> <p>Name: Jeni Jackson</p> <p>Position: Assistant Director of Environment and Community Services</p> <p><b>London Borough of Wandsworth</b></p> <p>Date: 4 September 2023</p>
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## Annexe 1. Schedule of engagement between the parties

In November 2020, LB Wandsworth (LBW) was notified and invited to make representations on Lambeth's Draft Local Views Supplementary Planning Document (SPD). No representations were received from the LBW.

In February 2020, LBW was notified and invited to comment on Lambeth's Draft Lambeth Design Code SPD. No representations were received from the LBW.

In January 2021, LBW was notified that Kennington Oval and Vauxhall (KOV) Neighbourhood Forum had applied to be re-designated and invited them to make representations. No representations were received from the LBW.

In January 2022, LBW was notified and invited to make comments on Lambeth's Draft SA DPD. No representations were received from the LBW.

In July 2022, LBW was notified and invited to make representations on Lambeth's Revised Draft Lambeth Design Guide SPD. No representations were received from the LBW.

On 12 December 2022, Officers from both authorities met to discuss strategic cross border planning matters under the duty to cooperate and to develop this statement of common ground. Lambeth officers provided a presentation to Wandsworth officers outlining the proposals including the nearest sites. No issues were identified, and it was agreed that Lambeth would lead on this SCG.

In addition, All London Borough Planning Officer meetings (Association of London Planning Officers) took place on the following dates:

- 30 April 2020 (Policy Officers Subgroup)
- 15 September 2020 (Development Plans meeting)
- 25 November 2020
- 15 February 2021
- 10 June 2021 (Sub-Committee)
- 29 June 2021 (Dev Plan meeting)
- 16 September 2021 (Dev Plan meeting)
- 12 October 2021 (Dev Plan meeting)
- 16 December 2021
- 8 March 2022 (Dev Plan meeting)
- 30 June 2022
- 18 October 2022
- 8 November 2022 (Dev Plan meeting)
- 23 January 2023

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Annexe 2. Dec 2019 Statement of Common Ground

[Please visit this link to the Local Plan 2021 evidence base for the Statement of Common Ground between London Borough of Lambeth and the London Borough of Wandsworth December 2019](#)

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### Annexe 3. Sep 2022 Statement of Common Ground

[Visit this link to see the 2022 Statement of Common Ground between the London Borough of Wandsworth and neighbouring boroughs](#)