

Site Allocations Development Plan Document

Duty to Cooperate - Statement of Compliance (Final Version)

October 2024


Lambeth

Contents

1. Introduction	3
2. Legal and Policy Context	3
3. Defining Lambeth’s Duty to Cooperate Bodies.....	4
Prescribed bodies	5
4. Duty to Cooperate in the context of the SADPD.....	6
5. Preparation of the SADPD and summary of engagement.....	8
Initial Plan Preparation	8
Preferred Options Stage (Reg 18 Consultation).....	8
Publication Stage (Reg 19 consultation).....	9
Statements of Common Ground	9
6. Relevant Engagement with Prescribed Bodies	11
City of London	11
City of Westminster.....	12
London Borough of Bromley.....	12
London Borough of Croydon	13
London Borough of Merton	13
London Borough of Southwark	14
London Borough of Wandsworth	15
Greater London Authority (GLA)	16
Transport for London (TfL).....	17
Environment Agency (EA).....	17
Natural England (NE)	18
Historic England (HE)	18
Civil Aviation Authority.....	19
NHS England and South East London ICS	19
Office of Rail and Road	20
Marine Management Organisation (MMO).....	21
Waste Planning Authority.....	21

7.	Further changes to the SADPD	21
8.	Conclusion and next steps	22

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 its 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 sets out how LBL has sought to engage and cooperate with neighbouring authorities and the other prescribed bodies. It helps demonstrate that the SADPD is legally compliant and meets the tests of soundness, as set out in the NPPF.
- 1.4 In addition, this Statement provides an overview of joint working to date and identifies how LBL is responding to any strategic and cross-boundary issues identified through working with our partners.
- 1.5 Details of all meetings held with DtC partners are set out in Section 6 of this document.
- 1.6 Where helpful, LBL has agreed Statements of Common Ground (SCG) with neighbouring boroughs and other prescribed bodies. These set out areas of agreement and outline future opportunities for engagement under the DtC. The SCG are listed in Section 5 and are published in the SADPD Examination Library.

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 Paragraph 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 Lambeth 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 on 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 Integrated Care Boards (ICB) 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. LBL'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. Duty to Cooperate in the context of the SADPD

- 4.1 The SADPD will add site-specific policies to those already in the Lambeth Local Plan 2021. The principal objective of the SADPD is to help to unlock investment on thirteen sites across the borough to deliver mixed use development including housing and unlock other public benefits.
- 4.2 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.
- 4.3 It will be part of the suite of policy documents that help deliver sustainable growth, investment and opportunity in Lambeth, along with the CIL Charging Schedule and supplementary planning documents. It is also intended to support the implementation of other Council strategies including the Borough Plan, Economic Resilience Strategy, Transport Strategy and Climate Action Plan.

- 4.4 While the majority of strategic issues will continue to be addressed through existing policies in the Lambeth Local Plan 2021 and the London Plan 2021, the SADPD will support the council in planning and delivering against the objectives of these plans.
- 4.5 LBL previously agreed Statements of Common Ground with neighbouring boroughs and some other relevant bodies, including the GLA and Historic England when preparing its Local Plan 2021. The majority of these existing agreements remain in place and consider a wide range of strategic matters and set out how the parties intend to deal with these issues. These include:
- 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.
- 4.6 Engagement undertaken as part of the DtC for the SADPD has provided an opportunity to revisit these issues. Officers have considered the cumulative impact that the SADPD may have on strategic matters, and also the potential cross-border impact that may arise as a result of individual site allocations. Where relevant, new Statements of Common Ground have been agreed to summarise key issues and detail areas of cooperation between parties going forward. Details are set out in Sections 5 and 6 of this document.

5. Preparation of the SADPD and summary of engagement

- 5.1 This section provides an overview of the preparation of the SADPD to date and sets out how the Council has engaged with DtC bodies as part of this process. A detailed schedule of relevant engagement with the prescribed Duty to Cooperate bodies is set out in Section 6 of this document.

Initial Plan Preparation

- 5.2 Preparation of the SADPD began in 2020, coinciding with work on the Lambeth Local Plan 2021.
- 5.3 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)

- 5.4 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.
- 5.5 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.
- 5.6 A total of 3,308 representations were received from residents, landowners, business owners and other stakeholders. The Council received representations from the following DtC Bodies:
- Greater London Authority (on behalf of the Mayor of London);
 - Transport for London;
 - Historic England;
 - Environment Agency; and
 - Natural England.
- 5.7 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)

- 5.8 The SADPD Proposed Submission Version (SADPD PSV) was prepared with due regard to representations received at Reg 18, DtC and engagement activities, updated evidence studies, recommendations of the Sustainability Appraisal, alongside changes to national planning policy and guidance where relevant.
- 5.9 As a result, changes were made to all site allocations although the extent of the changes varies between sites. One site has been removed (SA 19 Knolly's Yard), while two have had significant changes made to their boundaries (SA18 300-346 Norwood, and SA21 51–57 Effra Road). Further work was also 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](#).
- 5.10 Additional meetings were held with all neighbouring authorities, and some DtC bodies, to ensure any relevant matters raised in representations provided at Reg 18 had been properly considered, and proposed changes were appropriate, while ensuring all cross-boundary and strategic issues had been properly considered.
- 5.11 The council consulted on its Regulation 19 SADPD PSV between 8 March and 3 May 2024. The consultation was re-opened for a further eight weeks between 18 June and 13 August 2024. This was because a technical error occurred which meant email notifications were not sent to all consultees that had responded to Regulation 18 consultation.
- 5.12 Lambeth received responses to its Regulation 19 consultation from the following DtC bodies.
- LB Croydon;
 - LB Southwark;
 - Greater London Authority (on behalf of the Mayor of London);
 - Transport for London;
 - Historic England;
 - Environment Agency; and
 - Natural England.

Statements of Common Ground

- 5.13 SCG have now been agreed with all neighbouring boroughs, and also with the GLA and Historic England. The SCG and this Duty to Cooperate Statement of Compliance

have been submitted to the Planning Inspectorate alongside the SADPD. The SCG are published in the SADPD Examinations Library as follows:

- SCG01: Statement of Common Ground between LB Lambeth and GLA
- SCG02: Statement of Common Ground between LB Lambeth and City of London
- SCG03: Statement of Common Ground between LB Lambeth and City of Westminster
- SCG04: Statement of Common Ground between LB Lambeth and LB Bromley
- SCG05: Statement of Common Ground between LB Lambeth and LB Croydon
- SCG06: Statement of Common Ground between LB Lambeth and LB Merton
- SCG07: Statement of Common Ground between LB Lambeth and LB Southwark
- SCG08: Statement of Common Ground between LB Lambeth and LB Wandsworth
- SCG09: Statement of Common Ground between LB Lambeth and Historic England

5.14 The SCG demonstrate that effective cooperation has been made, and that parties agree that the proposed site allocation policies are unlikely to cause any harmful cross-boundary or strategic issues, having regard to existing development plan policy and DtC arrangements.

6. Relevant Engagement with Prescribed Bodies

6.1 This section provides a record of relevant DtC meetings and communication between LBL and the Prescribed Bodies between April 2020 and September 2024:

City of London

- On 19 November 2021, officers discussed Lambeth's draft SADPD and upcoming Reg 18 consultation.
- On 25 November 2022, Lambeth provided a presentation outlining its SADPD including the nearest sites with the City of London. No issues were identified, and it was agreed that Lambeth would lead on a SCG.
- On 22 May 2023, Lambeth gave an overview of the evolution of the modelling and the refinements they intended to make to the accompanying evidence base documents following Regulation 18 consultation. The City of London provided an update on its draft City Plan 2040. The structure and content of the SCG was also discussed.
- On 24 October 2023, officers discussed City of London's Local Plan review and related evidence base documents. Lambeth provided an update of its SADPD, covering the key changes in its proposed submission version. Lambeth agreed to meet to with City of London's heritage colleagues to discuss Site Allocation 9.
- On 19 December 2023, officers discussed indicative massing and building heights for Site Allocation 9 – Gabriel's Wharf and Princes Wharf, considering the impact of the site allocation on any relevant heritage assets and protected views. No concerns were raised by the City of London.
- In March 2024, the City of London was invited to make representations on Lambeth's Reg 19 SADPD PSV. No comments were received.
- In May 2024, a joint SCG was agreed and signed with the City of London. This confirms arrangements on strategic and cross-border matters between the two parties.
- The City of London consulted on its 'City Plan 2040' under Regulation 19 between 18 April - 31 May 2024. Lambeth submitted representations stating that it considered the plan to be sound, and that there were no outstanding matters remaining between the two parties.
- In June 2024, the City of London was notified of Lambeth's Reg 19 consultation on the SADPD PSV opening for a further 8 weeks. No comments were received.

City of Westminster

- In November 2021, officers discussed Lambeth's SADPD and upcoming Reg 18 consultation.
- In January 2022, the City of Westminster was invited to make comments on Lambeth's Draft SADPD. No representations were received from the City of Westminster.
- In February 2022, officers discussed progress on Lambeth's SADPD and key sites within the vicinity of the City of Westminster.
- On 29 November 2022, Lambeth provided a presentation outlining the nearest sites to the borough boundaries with specific attention given to the Westminster World Heritage Site. No issues were identified, and it was agreed that Lambeth would lead on a SCG.
- On 10 May 2023, officers discussed the modelling for the site allocations, the Westminster World Heritage Site, and the form and scope of a SCG.
- On 14 September 2023, officers discussed Westminster's Local Plan Review. Officers discussed affordable housing, student accommodation, retrofit/demolition, and the site allocations close to the borough boundaries.
- On 4 October 2023, 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.
- A SCG was agreed and signed with the City of Westminster in January 2024. This confirms existing arrangements on strategic matters remain in place between the two parties, and that no additional strategic issues are likely to arise as a result of the SADPD.
- In March 2024, the City of Westminster was invited to make representations on Lambeth's Reg 19 SADPD PSV. No comments were received.
- In June 2024, the City of Westminster was notified of Lambeth's Reg 19 consultation on the SADPD PSV opening for a further eight weeks. No comments were received.

London Borough of Bromley

- In January 2022, London Borough of Bromley was invited to make comments on Lambeth's Draft SADPD. No representations were received.
- In 25 November 2022, officers discussed cross border planning matters under the DtC and to develop a 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 the SCG.

- A SCG was agreed and signed with Bromley in January 2024. This confirms existing arrangements on strategic matters remain in place between the two parties, and that no additional strategic issues are likely to arise as a result of the SADPD.
- In March 2024, Bromley was invited to make representations on Lambeth's Reg 19 SADPD PSV. No representations were received.
- In June 2024, Bromley was notified of Lambeth's Reg 19 consultation on the SADPD PSV opening for a further eight weeks. No comments were received.

London Borough of Croydon

- In September 2021, officers discussed Lambeth's draft SADPD and upcoming Reg 18 consultation.
- In January 2022, Croydon was invited to make comments on Lambeth's Draft SADPD. No representations were received.
- In July 2022, the Croydon was invited to make representations on Lambeth's Revised Draft Lambeth Design Guide SPD. No representations were submitted by LBL.
- On 23 November 2022, officers discussed strategic cross border planning matters under the DtC and to develop a SCG for the SADPD. Lambeth gave an overview of the nearest site to the border. No issues were identified, and it was agreed that Lambeth would lead on the SCG.
- A SCG was agreed and signed with Croydon in January 2024. This confirms existing arrangements on strategic matters remain in place between the two parties, and that no additional strategic issues are likely to arise as a result of the SADPD.
- In March 2024, Croydon was invited to make representations on Lambeth's Reg 19 SADPD PSV. On 2 May 2024, Croydon submitted representations confirming it had no further comments to make, referring to the SCG agreed in December 2023.
- In June 2024, Croydon was invited to make representations on Lambeth's Reg 19 SADPD PSV. No further representations were received.

London Borough of Merton

- In January 2022, Merton was invited to make comments on Lambeth's Draft SADPD. Having reviewed the document and determined that the nearest site proposals to

Merton) are approximately 3 miles away from Merton's border, no comments were made on Lambeth's draft SADPD.

- On 15 March 2023, officers discussed whether there were any cross-boundary issues arising from the Draft SADPD. Lambeth gave an overview of the nearest site to the border. No cross boundary or strategic issues were identified.
- A SCG was agreed and signed with Merton in January 2024. This confirms existing arrangements on strategic matters remain in place between the two parties, and that no additional strategic issues are likely to arise as a result of the SADPD.
- In March 2024, Merton was invited to make representations on Lambeth's Reg 19 SADPD PSV. No representations were received.
- In June 2024, Merton was invited to make representations on Lambeth's Reg 19 SADPD PSV. No representations were received.

London Borough of Southwark

- In September 2021, officers discussed Lambeth's draft SADPD and upcoming Reg 18 consultation.
- In January 2022, Southwark was invited to make comments on Lambeth's Draft SADPD. No representations were received.
- In March 2022, officers discussed Southwark's Camberwell Characterisation Study. Officers also discussed the draft SADPD and site allocations within the vicinity of the borough boundaries, including SA24 (King's College Hospital).
- On 29 November 2022, officers discussed the sites close to the borough boundaries and changes proposed in response to Reg 18 consultation.
- On 13 December 2022, Southwark submitted representations on the Lambeth SADPD under the DtC.
- On 13 April 2023, 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 2023, officers discussed the indicative modelling for Site Allocation 7 (6-12 Kennington Lane), demonstrating views of the VuCity model from various sensitive locations within Southwark. The structure and content of a Statement of Common Ground was also agreed.
- A SCG was agreed and signed with Southwark in January 2024. This confirmed that Southwark would not expect Lambeth to accommodate any of its unmet need for nursing home places, and that Southwark had no concerns regarding the height and massing of SA7. The SCG confirms existing arrangements on strategic matters

remain in place between the two parties, and that no additional strategic issues are likely to arise as a result of the SADPD. A copy of the SCG can be found in the examination library.

- In March 2024, Southwark was invited to make representations on Lambeth's Reg 19 SADPD PSV.
- On 2 May 2024, Southwark submitted representations on the SADPD PSV under Reg 20. Comments related to SA7 (6-12 Kennington Lane), SA9 (Gabriel's Wharf and Prince's Wharf) and SA 24 (Kings Hospital). This requested certain heritage assets were referenced in the relevant Heritage sections of the SADPD. These representations also stated that SA7 was not suitable for a tall building.
- On 4 July 2024, Lambeth met with design and conservation officers at Southwark to discuss comments made in its Reg 20 statement of representation, relating to the suitability of a tall building at SA7. Southwark agreed they had no further concerns regarding the height and massing for SA7 and the site may be appropriate for a tall building, subject to further testing of views at application stage. Lambeth agreed it would add reference to those additional heritage assets requested by Southwark as part of its Schedule of Proposed Modifications.
- In June 2024, Southwark was notified of Lambeth's Reg 19 consultation on the SADPD PSV opening for a further eight weeks. Southwark submitted updated representations, removing the previous comments which stated Site 7 was not appropriate for a tall building. Comments noted that Southwark had no concerns with the indicative heights, though recommended that views of any proposed tall development which comes forward on this site could still be tested by developers.

London Borough of Wandsworth

- In January 2021, officers discussed Wandsworth's Local Plan Review. Lambeth also outlined progress on its Local Plan 2021, and summarized plans to produce a Site Allocations Document.
- In January 2022, officers discussed Lambeth's draft SADPD and upcoming Reg 18 consultation.
- In January 2022, Wandsworth was invited to make comments on Lambeth's Draft SADPD. No representations were received.
- In August 2022, a joint SCG was signed between the LB 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. This confirmed effective joint working had been undertaken during the

preparation of Wandsworth's draft Local Plan and formalised various areas of cooperation on strategic issues.

- On 12 December 2022, Lambeth gave an overview of the SADPD, including sites nearest to the borough border. No issues were identified, and it was agreed that Lambeth would lead on a Statement of Common Ground (SCG).
- A SCG was agreed and signed with Wandsworth in January 2023. This confirms existing arrangements on strategic matters remain in place between the two parties, and that no additional strategic issues are likely to arise as a result of the SADPD.
- In March 2024, Wandsworth was invited to make representations on Lambeth's Reg 19 SADPD PSV. No representations were received.
- In June 2024, Wandsworth was notified of Lambeth's Reg 19 consultation on the SADPD PSV opening for a further eight weeks. No representations were received.

Prescribed Bodies:

Greater London Authority (GLA)

- Throughout 2020 and 2021, discussions took place on the GLA's Homebuilding Capacity Fund Grant and how this would support Lambeth's SADPD.
- In January 2022, the GLA was invited to make comments on Lambeth's Draft SADPD. Representations were submitted in February 2022 which requested several changes to the draft document.
- In Autumn 2022, officers discussed issues raised by the GLA in its representations submitted at Reg 18.
- In October 2023, changes were made to the SADPD in response to the GLA's Reg 18 representation. The discussion focused on key changes to the policy text and the format of the future SCG.
- In March 2024, the GLA was invited to make representations on Lambeth's Reg 19 SADPD PSV.
- On 19 April, the GLA provided a statement of representation under Reg 20 confirming the SADPD is in general conformity with the London Plan.
- In June 2024, the GLA was notified of Lambeth's Reg 19 consultation on the SADPD PSV opening for a further eight weeks. No further representations were received.
- A Statement of Common Ground was agreed and signed between Lambeth and the GLA in September 2024. The SCG confirms that Lambeth has incorporated all the

GLA's recommended updates/changes into the SADPD PSV and that no outstanding matters remain.

Transport for London (TfL)

- In December 2020, Lambeth undertook early engagement with TfL on the emerging SADPD and received high level initial comments later that month.
- In January 2022, TfL were invited to make comments on Lambeth's Draft SADPD. TfL responded on 18 February 2022, suggesting various changes to the draft SADPD. Lambeth policy officers have responded to the comments and made revisions to the SADPD PSV as a result.
- In February 2022, TfL's commercial property team provided a separate response to the draft SADPD.
- In March 2024, TfL was invited to make representations on Lambeth's Reg 19 SADPD PSV. These requested various clarifications and changes are made to the SADPD PSV. Details of the key issues raised and Lambeth's response to these can be found within the SADPD Examination Representations (Regulation 20) – From organisations document in the Examination Library.
- In June 2024, TfL was notified of Lambeth's Reg 19 consultation on the SADPD PSV opening for a further eight weeks. No further representations were received.

Environment Agency (EA)

- In July 2020, the EA was invited to comment on the draft Scoping Report for the Sustainability Appraisal for the SADPD. The EA responded on 2 September 2020 providing comments on the draft Scoping Report.
- In April 2021, the EA was invited to comment on Lambeth's 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 report. Comments from the EA were incorporated into the final document.
- In January 2022, the EA was 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.

- In March 2024, the EA was invited to make representations on Lambeth's Reg 19 SADPD PSV. The EA confirmed support for changes in response to its previous comments. The EA set out further suggested changes in tidal wall defences, flood risk, biodiversity, contaminated land and protection of water sources.
- In June 2024, the EA was notified of Lambeth's Reg 19 consultation on the SADPD PSV opening for a further eight weeks. No further representations were received.

Natural England (NE)

- In July 2020, NE was invited to comment on the draft Scoping Report for the Sustainability Appraisal for the SADPD. It responded on 19 August 2020 confirming it had no comments to make.
- In January 2022, NE was invited to make representation on Lambeth's Draft SADPD. Natural England responded on 17 February 2022, confirming it had no comments.
- In March 2024, NE was invited to make representations on Lambeth's Reg 19 SADPD PSV. On 19 April, Natural England submitted representations under Regulation 20 stating it had no comments to make on the SADPD.
- In June 2024, NE was notified of Lambeth's Reg 19 consultation on the SADPD PSV opening for a further eight weeks. No further comments were received.

Historic England (HE)

- In July 2020, Lambeth sought comments from HE on the draft Scoping Report for the Sustainability Appraisal on the SADPD. HE provided comments on 2 September 2020.
- In September 2021, Lambeth provided an overview of the council's objectives and approach for the Draft SADPD, outlining the basic framework for site allocations. 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 invited to make comments on Lambeth's Draft SADPD. Lambeth made revisions to the SADPD PSV accordingly.
- In March 2022, Lambeth officers met with HE. The SADPD PSV and the potential impact of development on the Westminster World Heritage Site was discussed.

- In October 2023, officers discussed the changes made to the SADPD PSV in light of HE's comments at Reg 18. Discussions focused on the policy wording 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.
- In March 2024, HE was invited to make representations on Lambeth's Reg 19 SADPD PSV. On 2 May, HE submitted representations under Regulation 20 stating that, generally the SADPD had been amended to reflect HE's previous concerns raised in its response at Regulation 18, noting that the evidence base had been expanded in line with previous advice.
- In June 2024, HE was notified of Lambeth's Reg 19 consultation on the SADPD PSV opening for a further eight weeks. No further comments were received.
- In September 2024, LBL and HE agreed a Statement of Common Ground. This confirmed that subject to compliance with the SADPD's historic environment and related policies, Lambeth's SADPD PSV addresses HE's outstanding concerns. This is confirmed by Historic England's Statement of Representation submitted at Lambeth's Reg 19 consultation for the SADPD PSV.

Civil Aviation Authority

- In January 2022, the Civil Aviation Authority was invited to make comments on LBL's Draft SADPD. No representations were received.
- In March 2024, the Civil Aviation Authority was invited to make representations on LBL's Reg 19 SADPD PSV. No comments were received.
- In June 2024, the Civil Aviation Authority was notified of Lambeth's Reg 19 consultation on the SADPD PSV opening for a further eight weeks. No comments were received.

NHS England and South East London ICS

- LBL has 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, LBL 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, LBL convened with the Capital Planning and Property team at SLAM Hospital Trust. LBL 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 invited to make comments on LBL's Draft SADPD. Savills submitted comments on behalf of Guy's and St Thomas' Foundation relating to SA1 (R084). WSP submitted comments on behalf of Guy's and St Thomas' Foundation relating to SA2 (R0806). ID Planning submitted comments on behalf of King's College Hospital Foundation relating to SA24 (R0625).
- In March 2024, the NHS England and various groups within the ICS were invited to make representations on LBL's Reg 19 SADPD PSV. WSP submitted reps on behalf of Guy's and St Thomas' Foundation relating to SA1, SA2 and SA7.
- In June 2024, the NHS England and various groups within the ICS were notified of Lambeth's Reg 19 consultation on the SADPD PSV opening for a further eight weeks. No further comments were received.

Office of Rail and Road

- In January 2022, the Office of Rail and Road was invited to make representations on the Draft SADPD. No comments were received.
- In March 2024, the Office of Rail and Road was invited to make representations on LBL's Reg 19 SADPD PSV. No comments were received.
- In June 2024, the Office of Rail and Road was notified of Lambeth's Reg 19 consultation on the SADPD PSV opening for a further eight weeks. No comments were received.

Marine Management Organisation (MMO)

- In January 2022, the MMO was invited to make representations on the Draft SADPD. No comments were received.
- In March 2024, the Marine Management Organisation was invited to make representations on LBL's Reg 19 SADPD PSV.
- In June 2024, the Marine Management Organisation was notified of Lambeth's Reg 19 consultation on the SADPD PSV opening for a further eight weeks. No comments were received.

Waste Planning Authority

- DtC activity took place through the London Waste Planning Forum (LWPF). Officers attended LWPF meetings during the course of plan preparation.
- In March 2024, the Western Riverside Waste Planning Authority (Lambeth is one of four London boroughs along with Hammersmith & Fulham, Royal Borough of Kensington & Chelsea and Wandsworth) was invited to make representations on LBL's Reg 19 SADPD PSV. No comments were received.
- In June 2024, the Western Riverside Waste Planning Authority was notified of Lambeth's Reg 19 consultation on the SADPD PSV opening for a further eight weeks. No comments were received.

7. Further changes to the SADPD

- 7.1 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.
- 7.2 Where necessary, the SADPD PSV has been updated to reflect any relevant comments raised by DtC bodies throughout its preparation.
- 7.3 Any proposed changes to the SADPD put forward in response to Reg 20 representations are set out within document SD 03 - Schedule of Proposed Modifications, available within the SADPD Examination Library.

8. Conclusion and next steps

- 8.1 Throughout the preparation of the SADPD, the Council has undertaken effective and continued engagement with a wide range of stakeholders, including all DtC bodies. The SADPD PSV (alongside the Schedule of Proposed Modifications) submitted for examination reflects the views and comments received during the engagement and cooperation process.
- 8.2 This report, in addition to the Reg 18 Consultation and Reg 19 Consultation Report and the accompanying SCG, demonstrates how the Council has positively complied with its DtC throughout the preparation of the SADPD.
- 8.3 Nine Statements of Common Ground are included within the SADPD Examination Library, alongside all representations received in response to the Regulation 18 and Regulation 19 consultations.
- 8.4 The DtC is an ongoing requirement. Any cross-border and strategic arrangements with neighbouring boroughs and other prescribed bodies will be kept under review and informed by continued communication between the relevant parties.