

Statement of Common Ground between
the London Borough of Lambeth and
Historic England

August 2024

Introduction

This Statement of Common Ground (SCG) has been prepared to demonstrate that the LB Lambeth's (LBL) Site Allocations Development Plan Document Proposed Submission Version (SADPD PSV) 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 PSV 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 SADPD will provide site-specific planning policy to provide certainty in the planning process, while promoting development which is beneficial to residents and visitors to the borough. 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 SADPD includes policies for thirteen sites, distributed across the borough.



This SCG confirms that continued engagement has taken place between LBL and Historic England. This is a “live” document that will be subject to review as the process progresses, detailing how issues have been resolved, and to clarify where issues remain.

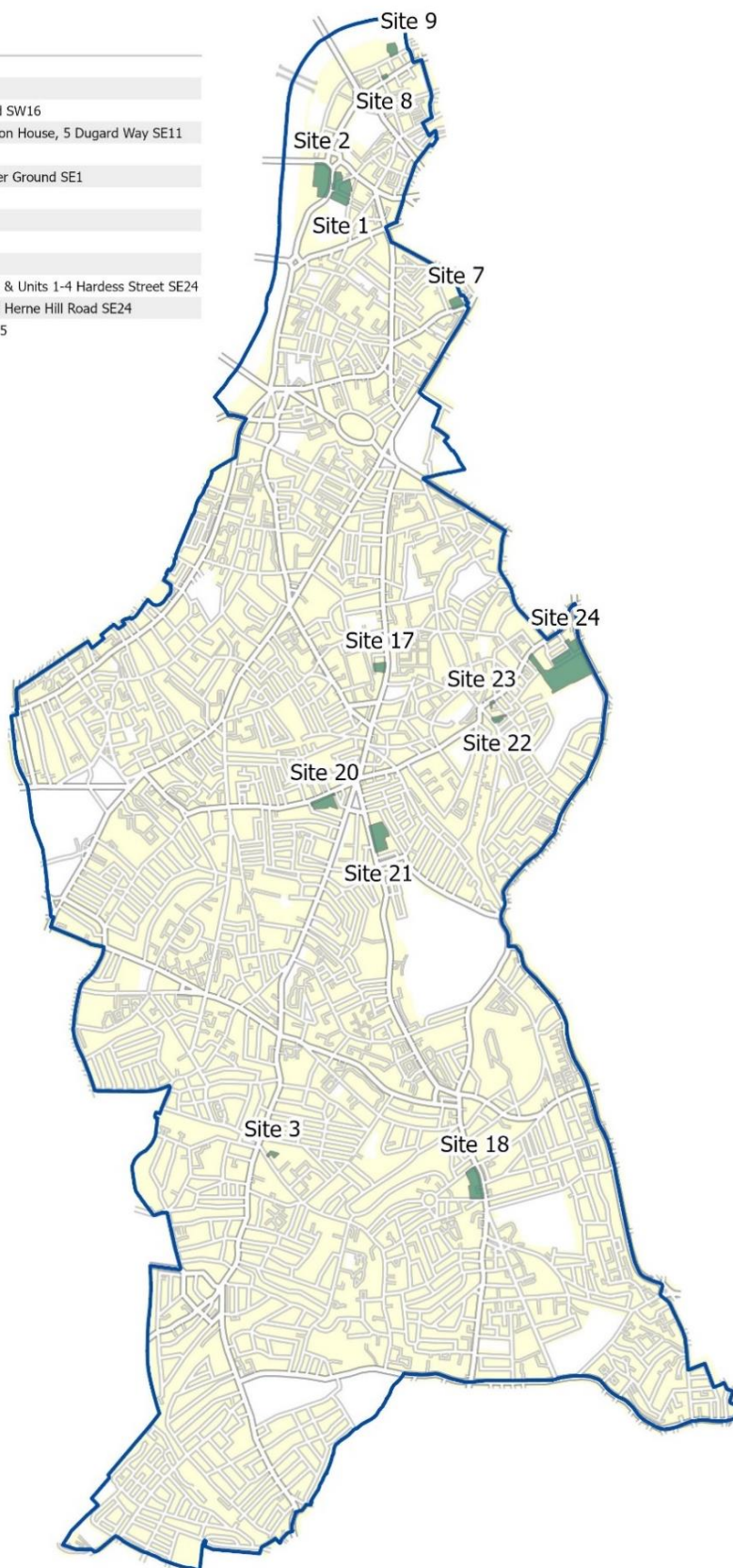
This SCG confirms that, subject to compliance with the SADPD's historic environment and related policies, Lambeth's SADPD PSV addresses HE's outstanding concerns. This is confirmed by Historic England's Statement of Representation submitted at Lambeth's Reg 19 consultation for the SADPD PSV (representation available in the SADPD Examination Library, please see: *SADPD Examination Representations (Regulation 20) – From organisations*).

*Map 1 – Site allocations within the SADPD PSV**

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

	LBL Borough Boundary
	Proposed LBL Site Allocations



1. Parties Involved

- London Borough of Lambeth
- Historic England

2. Strategic Geography

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 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

LBL 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, and sits on the opposite Thames to the Westminster World Heritage Site

3. Strategic Matters

Background

Historic England submitted representations to LBL's Reg 18 consultation on the draft SADPD which it consulted on between 10 January 2022 and 22 February 2022. On 12 October 2022 officers from Lambeth met with Emily Gee and Tom Foxall of HE at the St Thomas' Hospital (Site 02) for a tour of the site with Hospital representatives to understand its constraints and opportunities and to explain why a masterplan approach is not considered workable. The parties met again on 14 November 2022 and again in November 2023 to discuss the development of the SADPD PSV.

Particular attention has been given to the potential impact that site allocations could have on the Outstanding Universal Value (including setting) of the Westminster World Heritage Site (WWHS); especially in relation to key Strategic views of the Palace of Westminster within the WWHS.

LBL has been exploring these issues with HE for several years through the local plan process, and these matters were given detailed consideration during the preparation of the Lambeth Local Plan 2021. The following policies in the Lambeth Local Plan 2021 are of particular relevance:

Local Plan Policy Q19 relates to development affecting the setting and approaches of the WWHS. This requires that development to preserves or enhances the Outstanding Universal Value, authenticity, and integrity of the World Heritage Site. It seeks to preserve or enhance the environmental quality of the public realm/ vantage points; and also provide opportunities to better understand, appreciate and reveal the Outstanding Universal Value, authenticity, and integrity of the site.

Local Plan Policy Q24 relates to development that may affect the River Thames. This ensures that exceptional quality is required for new buildings and the spaces between them to ensure that the setting of the WWHS and other heritage assets, and London's image and status as a world city are preserved.

Local Plan Policy Q25 relates to the protection of views. The policy says that the council will resist harm to the significance of strategic views (Panoramas, Linear Views, River Prospects and Townscape Views defined in the LVMF and listed in Annex 6) and secure improvements within them in accordance with London Plan policy HC4. This also sets out additional requirements for views of local interest. It states that the council will seek to protect their general composition and character from harm. Particular regard is paid to the identification of views of the WWHS.

Local Plan Policy Q26 relates to tall building development and places particular emphasis on heritage impacts when assessing the acceptability of tall building proposals. The policy includes the provision for additional suitable tall building locations to be identified through the Site Allocations process and it is supplemented by maps in Annex 10 of the Local Plan that identify locations deemed suitable for tall building development (which included locations at Royal Street which is now a Site Allocation (SA Site 01).

Whilst HE made representations questioning its soundness (especially with regard Policy Q26), the Local Plan was found sound by the government's Inspectorate and adopted in 2021. HE maintains its position regarding these representations.

Lambeth's response to Historic England's representations

LBL has considered in detail each of Historic England's comments on Lambeth's draft SADPD made in its representation at Reg 18 consultation. Lambeth's response to each of these comments is set out in Table 1 at Appendix 1 of this document. Officers from Lambeth have met with their counterparts at Historic England to discuss these in detail and try to reach agreement, this has been productive and has helped resolved the issues raised in its representation.

LBL has amended the policy text and accompanying plans in the SADPD PSV to reflect these comments and discussions where applicable. This is supported by further design evidence to demonstrate the potential impact of the SADPD PSV, including a Heritage Impact Assessment which examines the cumulative impact of Sites 1 and 2.

Historic England's comments to Lambeth's response

Historic England welcomes the efforts made by the Council to engage with us throughout the process. Both parties have met regularly, and the Council has strived to respond to our concerns, which has led to a positive and proactive relationship. This is a live document which will be updated as the plan progresses.

4. 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 continue to inform the development of the SADPD through to examination, and both parties will continue to work collaboratively in order to meet the duty to cooperate.

Signed:



Name: Ciara Whelehan

Position: Assistant Director, Policy & Placeshaping

London Borough of Lambeth

Date: 22 August 2024

Signed:



Name: M. Statton

Position: Historic Environment Planning Advisor

Historic England

Date 28.08.2024

Appendix 1 – Table 1: Lambeth’s response to HE comments at Reg 18

Topic / Site	Historic England Comment at Reg 18	LB Lambeth response
General comment	We welcome the production of the SADPD, we believe that all of the sites included have development potential.	Noted.
General comment	Paragraph 4.2 of the 2019 Tall Buildings Study, states that as the areas identified as appropriate for tall buildings in the local plan were not allocations, detailed, site specific Heritage Impact Assessments (HIAs) and Heritage Assessments were not carried out and that allocations would be dealt with through the SADPD. The implication is that the Council is intending to carry out these assessments, it may be that the intention is do that in support of the regulation 19 version of the plan. We are happy to comment on any assessments that might be undertaken in the meantime.	High level HIA has been undertaken to inform the further development of the indicative models as part of the evidence base for the Reg 19 version of the SADPD, with a more detailed assessment of the effects of Site 1 and 2 on the W WHS. These HIAs do not preclude the need for HIA at application stage. With a more detailed assessment of the effects of Site 1 and 2 on the W WHS. These HIAs do not preclude the need for HIA at application stage.
General comment	Generally cumulative impacts are not addressed across all allocations. Where different allocations may have impacts on the same heritage assets it would be helpful to see them modelled together. Westminster World Heritage Site and Brockwell Park are particularly vulnerable to unintended cumulative harm.	An HIA has been produced to consider the effects of developing Sites 1 & 2 on the Westminster World Heritage Site includes consideration of cumulative effects.
General comment	We note the indicative massing diagrams are genuinely indicative and not policy. However, the evidence finds them to have acceptable impacts which sets the bar as to what level of harm may be acceptable. We have concerns with the findings, especially given the absence of HIAs (where relevant). Amending the wording of the SADPD would help resolve some of these concerns by stating that the heights are a maximum height, that developments still need to be character and context-led, and that cumulative harm must be taken into account as the townscape evolves etc.	<p>The suggestion to clarify building heights accepted. The policy text has been amended for the Reg 19 version of the SADPD to make clear these are maximum building heights for the following sites:</p> <ul style="list-style-type: none"> • Site 1: Royal Street– p. 20 • Site 2: St Thomas Hospital – p.33 • Site 21: 51–57 Effra Road SW2 – P. 89 <p>The remaining allocation sites are not sufficiently sensitive to justify including a maximum height limit.</p>

Topic / Site	Historic England Comment at Reg 18	LB Lambeth response
General comment	It would be helpful if the SADPD reminded applicants of the need to submit desk-based assessments for site falling within Archaeological Priority Areas upon application.	<p>Suggestion accepted and changes made to policy text for the Reg 19 version of the SADPD for the following sites:</p> <ul style="list-style-type: none"> • Site 1: Royal Street – p.19 • Site 2: St Thomas Hospital – p.32 • Site 8: 110 Stamford Street – p.44 • Site 9: Gabriel’s Wharf & Princess Wharf – p54 • Site 17: Brixton Road – p69. <p>Officers have agreed to also add a reference to the APA for Site 300-346 Norwood Road as part of the <i>Schedule of Proposed Changes</i> submitted for the SADPD’s examination.</p>
Royal St (Site 1)	We would like to discuss sites 1 and 2 with our London Advisory Committee and we may have additional comments to make which I hope we can provide before the next version of the plan is finalised. We appreciate that these can only be informal comments in the absence of a consultation.	Noted. HE provided feedback on the outcome of the meeting in a letter dated 27/06/2022. The letter recommended that an HIA, focusing on the WWHS, was prepared and that a requirement for a masterplan for the whole site was committed to in the SADPD. A copy of this letter is appended to this document.
Royal St (Site 1)	We advise that a Heritage Impact Assessment (HIA) that reflects the ICOMOS HIA Guidance is submitted in support of the St Thomas's Hospital site and Royal Street site allocations. We have concerns that the cumulative impacts of these developments, alongside others that have been approved, will result in harm to the Westminster World Heritage Site (WWHS). The Operational Guidelines for the Implementation of the World Heritage Convention (2019) stress the importance of Heritage Impact assessment, noting at paragraph 118 that these should "be a pre-requisite for development projects and activities that are planned for implementation	An HIA focused on the effects to the WHS has been undertaken and forms part of the evidence base for the SADPD. Requirement for a Heritage Impact Assessment added to the policy text for SA1 (Royal St) and SA2 (St Thomas’ Hospital).

Topic / Site	Historic England Comment at Reg 18	LB Lambeth response
	within or around a World Heritage property".	
Royal St (Site 1)	A master planning exercise for all sites across the hospital campus might be a helpful way of understanding how development could be distributed across the area rather than focusing on a building by building approach. This might help deliver similar amounts of development with lesser impacts.	The hospital does not currently have a masterplan, and is reluctant to commit to preparing a masterplan given everchanging NHS and health care priorities and funding mechanisms. Furthermore, the two sites are in separate ownership. The site allocation focuses on the least sensitive part of the campus that would most benefit from a planned approach to development.
Royal St (Site 1)	<p>Site 1: Royal Street</p> <p>We note that the heights accord with the Local Plan, but that does not necessarily mean that they will be wholly acceptable across the entire site, particularly when a new development has been approved since the local plan was adopted which will have an impact on what other sites in the area can then accommodate sustainably. The policy wording refers to "general building height", we advise that the plan expresses this as a maximum height and requires any development proposals to be based on cumulative impacts.</p>	Accepted. Following further evidence work we have now identified maximum heights. General building heights changed to maxima.

Topic / Site	Historic England Comment at Reg 18	LB Lambeth response
Royal St (Site 1)	The maximum height might be achievable in certain parts of the site, but a consistent height horizontally across the site, as indicated in figure 20 of the evidence paper, may be more problematic as shown in the TVIA images.	Accepted. We have looked again at the model massing. However, the evidence work is just an 'indicative approach' and it should not be given great weight. It is purely undertaken to identify parameters and is not a proposal. Changes made in relation maximum heights to protect the silhouette of Elizabeth Tower will have the effect of suppressing height across parts of the site and will address this point.
Royal St (Site 1)	Building heights vary within the locality but are lower to the south of the site, we welcome the development requirement to reduce height to the southern part of the site, but the indicative images show the height reducing quite suddenly rather than a gradual stepped down approach. As above the indicative diagrams show constant building heights, at the maximum height, associated with each "block" whereas a more varied approach might help mitigate their impact upon the historic environment.	Accepted. The Indicative Approach model has been revised accordingly. The comparable images can be found in Reg 18 Design Evidence Figure 20 and in Reg 19 Design Evidence Figure 38. However, it should be remembered that the evidence work is just an 'indicative approach' and is purely undertaken to identify parameters and is not a proposal.
Royal St (Site 1)	The TVIA images have modelled the approved Evelina Hospital development, but the impacts have not been assessed and the evidence does not address the implications of the approval and cumulative harm that might arise.	Accepted. We have undertaken further cumulative impact assessment, which has included the Evelina Hospital extension approval. See evidence document.
Guys and St Thomas (Site 2)	We would like to discuss sites 1 and 2 with our London Advisory Committee and we may have additional comments to make which I hope we can provide before the next version of the plan is finalised. We appreciate that these can only be informal comments in the absence of a consultation.	Noted. HE provided feedback on the outcome of the meeting in a letter dated 27/06/2022. The letter recommended that an HIA, focusing on the WWHS, was prepared and that a requirement for a masterplan for the whole site was committed to in the SADPD. A copy of this letter is appended to this document.

Topic / Site	Historic England Comment at Reg 18	LB Lambeth response
Guys and St Thomas (Site 2)	<p>We advise that a Heritage Impact Assessment (HIA) that reflects the ICOMOS HIA Guidance is submitted in support of the St Thomas's Hospital site and Royal Street site allocations. We have concerns that the cumulative impacts of these developments, alongside others that have been approved, will result in harm to the Westminster World Heritage Site (WWHS). The Operational Guidelines for the Implementation of the World Heritage Convention (2019) stress the importance of Heritage Impact assessment, noting at paragraph 118 that these should "be a pre-requisite for development projects and activities that are planned for implementation within or around a World Heritage property".</p>	<p>Heritage Impact Assessment has been included in the evidence. This includes an assessment of the cumulative impact of sites 1 and 2 on the WWHS.</p>
Guys and St Thomas (Site 2)	<p>A master planning exercise for all sites across the hospital campus might be a helpful way of understanding how development could be distributed across the area rather than focusing on a building by building approach. This might help deliver similar amounts of development with lesser impacts.</p>	<p>The hospital does not currently have a masterplan, and is reluctant to commit to preparing a masterplan given everchanging NHS and health care priorities and funding mechanisms. Furthermore, the two sites are in separate ownership. The site allocation focuses on the most sensitive part of the campus that would most benefit from a planned approach to development.</p>
Guys and St Thomas (Site 2)	<p>We have concerns as to the indicative heights set out for the site. The definition of a tall building within this part of Lambeth is 45m, the indicative heights for the site have been modelled at 44m and the SADPD indicates that this height will be acceptable. This stretches the limits of what can be done without being defined as a tall building, and in our view a difference of 1m does not meaningfully mitigate the impacts of having a tall building on the site. More guidance should be included to guide scale and height parameters. Parts of Block B might be almost entirely screened by existing development and these heights might be feasible in most</p>	<p>The indicative approach to heights and massing have been revisited in the SADPD for Sites 2, and that to Gassiot House has been reduced. Please see the revised Reg 19 Design Evidence.</p>

Topic / Site	Historic England Comment at Reg 18	LB Lambeth response
	instances, however, this is not the case for all parts of Block B or Part A	
Princes and Gabriels wharf (Site 9)	We advise that further TVIA images are carried out to support a building of 44m on this site. The site is identified as not being suitable for a tall building and a height of 44m would not meaningfully mitigate the effect of a tall building. The area is low to mid-rise and a building substantially taller would have implications and does not reflect the surrounding character of the area	There are a number of noticeably taller buildings in the immediate locality (ITV tower c 80m etc.). The nearby Sea Containers building is c50m in height. Site allocations documents are an established means of identifying locations suitable for tall buildings. A scheme of 44m would not be out of keeping in this varied context. The Lambeth Local Plan policy definition for tall buildings in this locality is 45m. Anything up to that height is technically not a tall building and would be 'mid rise'. The Indicative approach of the evidence base has been further refined and the TVIA work redone as a result. Please see Reg 19 Design Evidence.