

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.

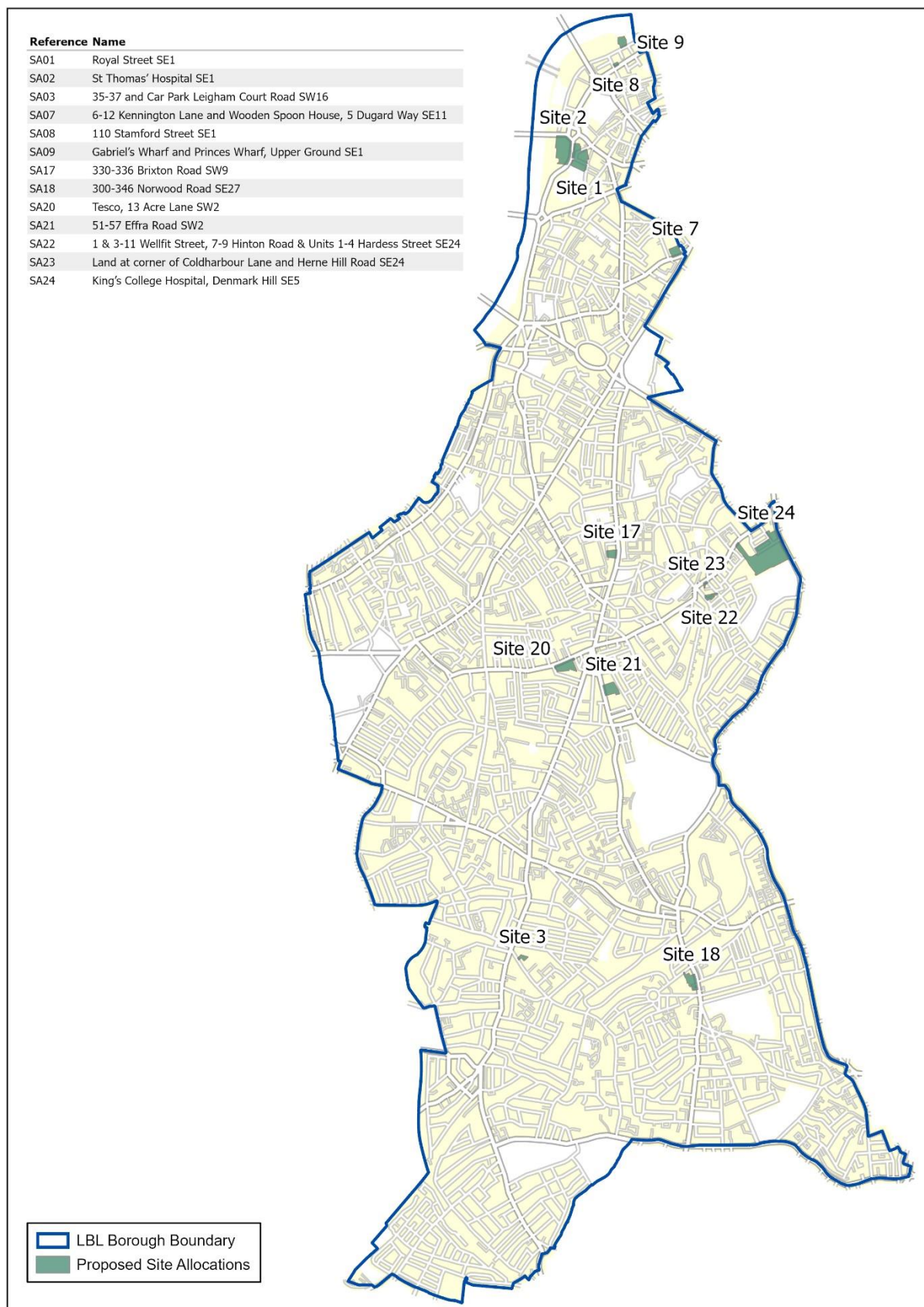
The draft SADPD is not a review of the existing Lambeth Local Plan 2021. Once adopted the SADPD and Lambeth Local Plan 2021 will form part of the development plan for the borough, alongside the South Bank & Waterloo Neighbourhood Plan, and the London Plan 2021.

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

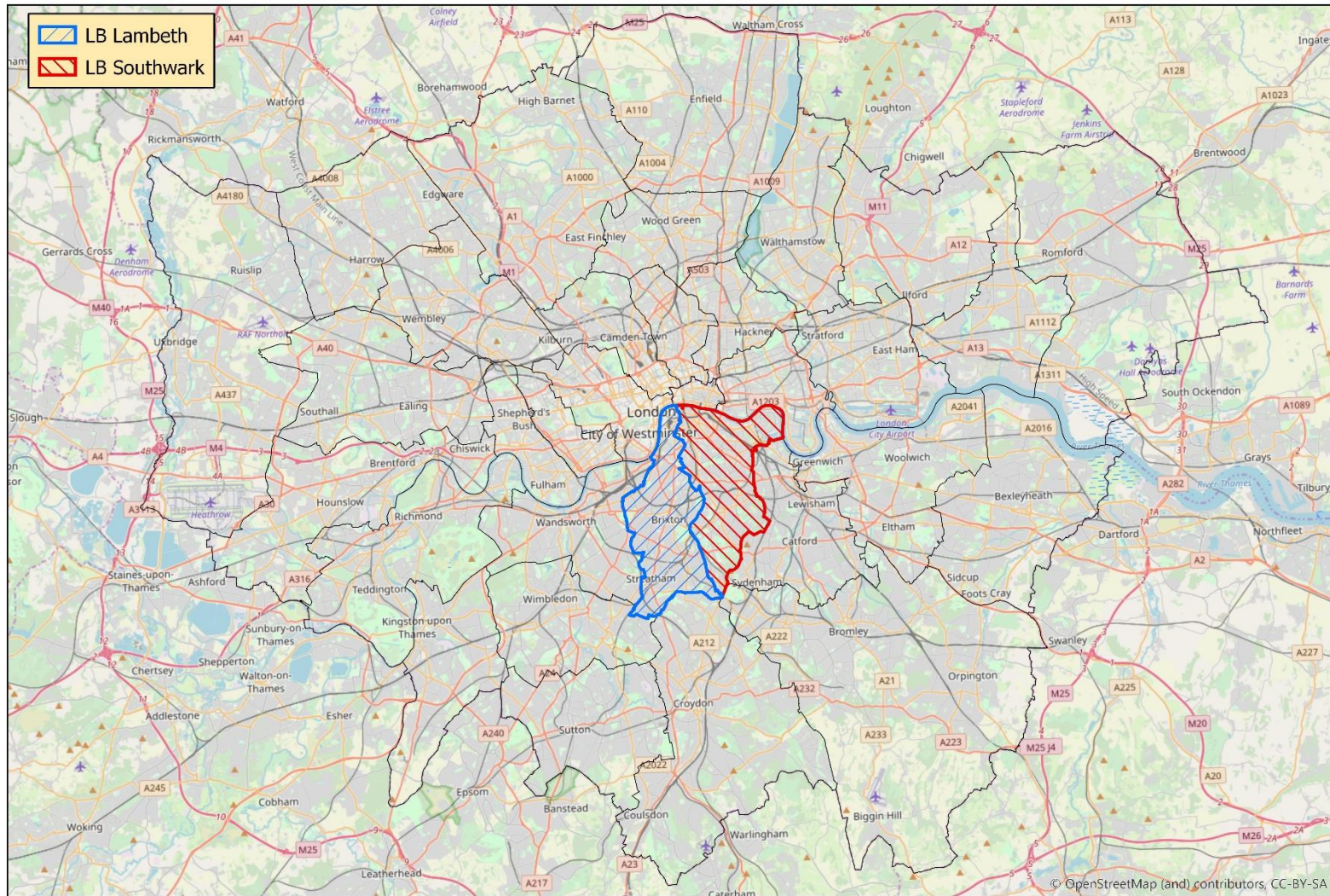
Lambeth is an inner London borough with a northern boundary on the River Thames and situated mainly between the boroughs of Wandsworth and Southwark. It covers an area of approximately ten and a half square miles. It is surrounded by seven other London Boroughs - LB Southwark; LB Bromley; LB Croydon;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

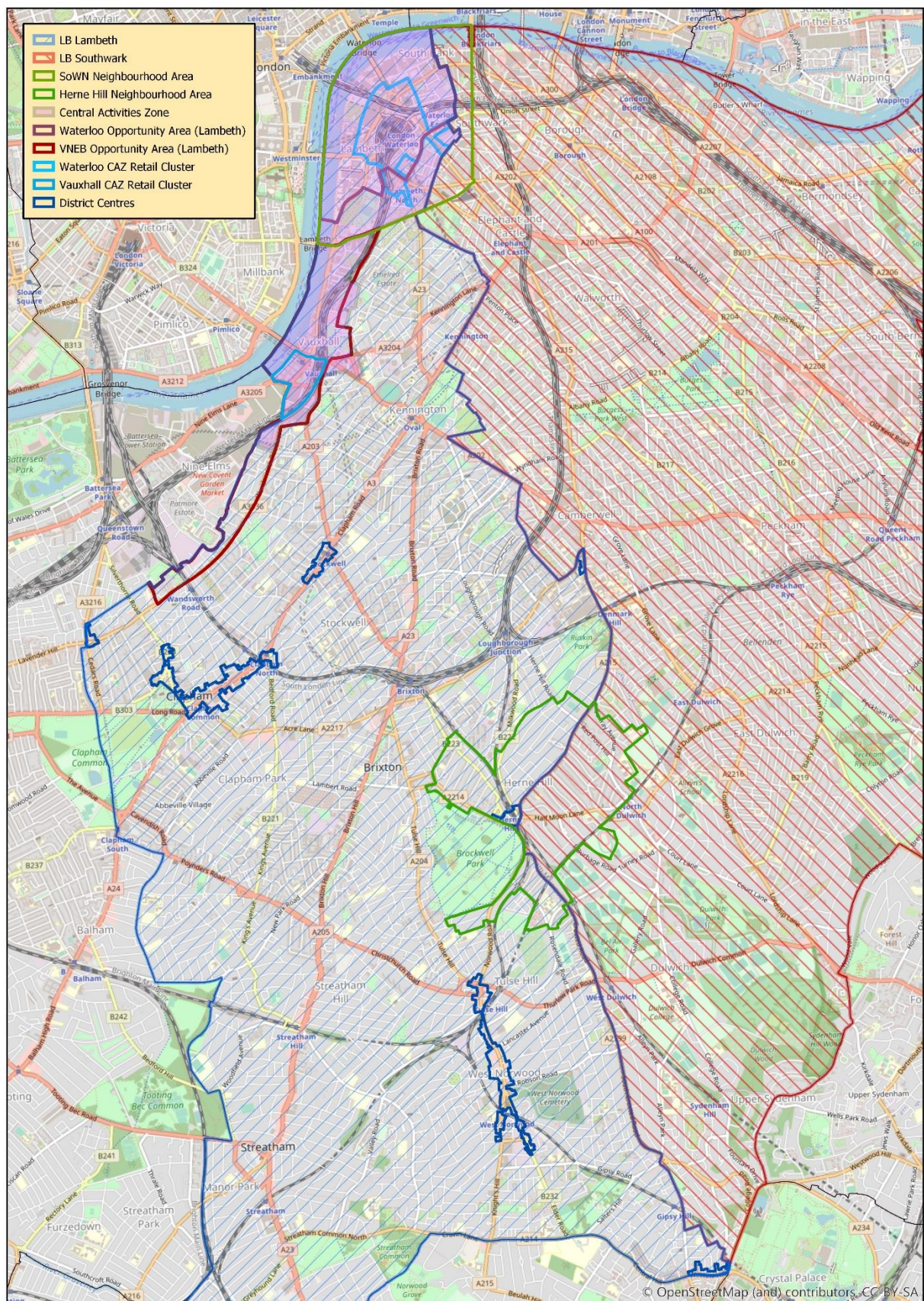
Map 2 – Boroughs involved in this Statement



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



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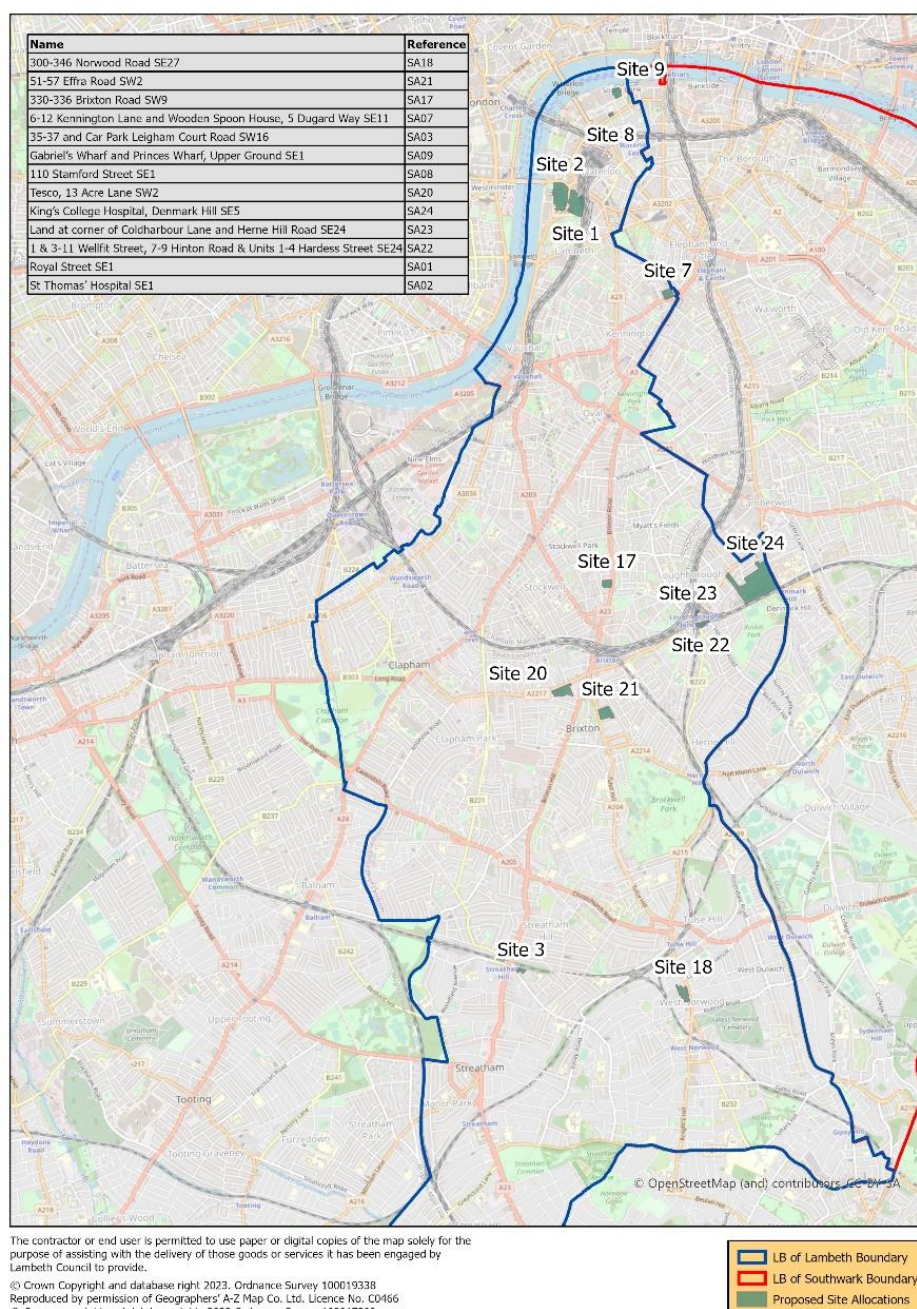
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4. Strategic Matters

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 annexe 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

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

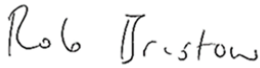
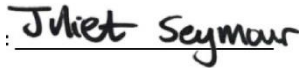
Table 2: Current Development Plan Documents being produced by LB Southwark

Dev Plan Document	Anticipated (or actual) publication for comment	Anticipated adoption date
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.

<div>Signed: </div> <div>Name: Rob Bristow</div> <div>Position: Director for Climate Change, Planning and Transport</div> <div><i>London Borough of Lambeth</i></div> <div>Date: 25/01/2024</div>	<div>Signed: </div> <div>Name: Juliet Seymour</div> <div>Position: Director of Planning</div> <div><i>London Borough of Southwark</i></div> <div>Date: 12/01/2024</div>
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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 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. 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.

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.