

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.

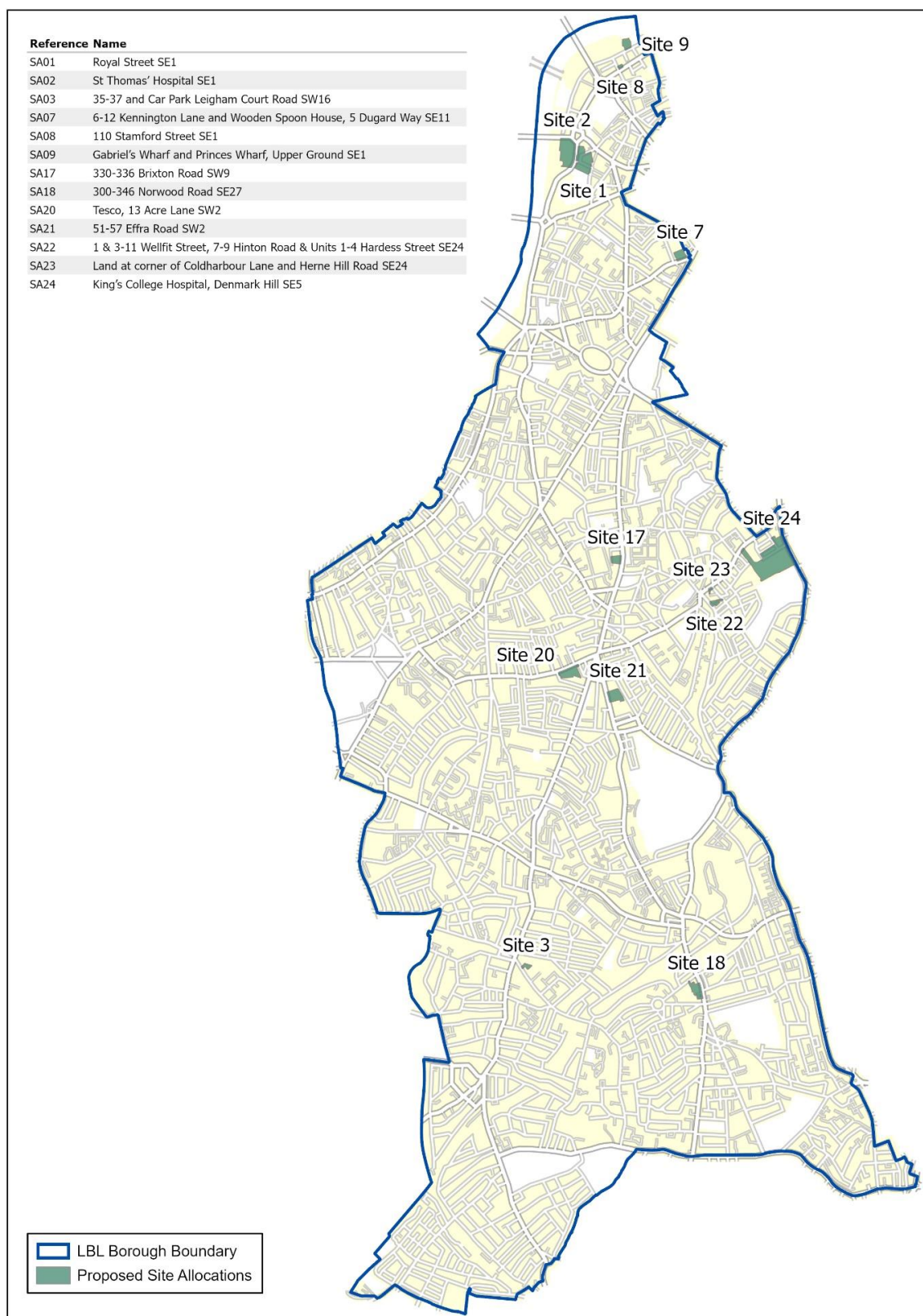
The draft SADPD is not a review of the existing Lambeth Local Plan 2021. Once adopted the SADPD and Lambeth Local Plan 2021 will form part of the development plan for the borough, alongside the South Bank & Waterloo Neighbourhood Plan, and the London Plan 2021.

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.

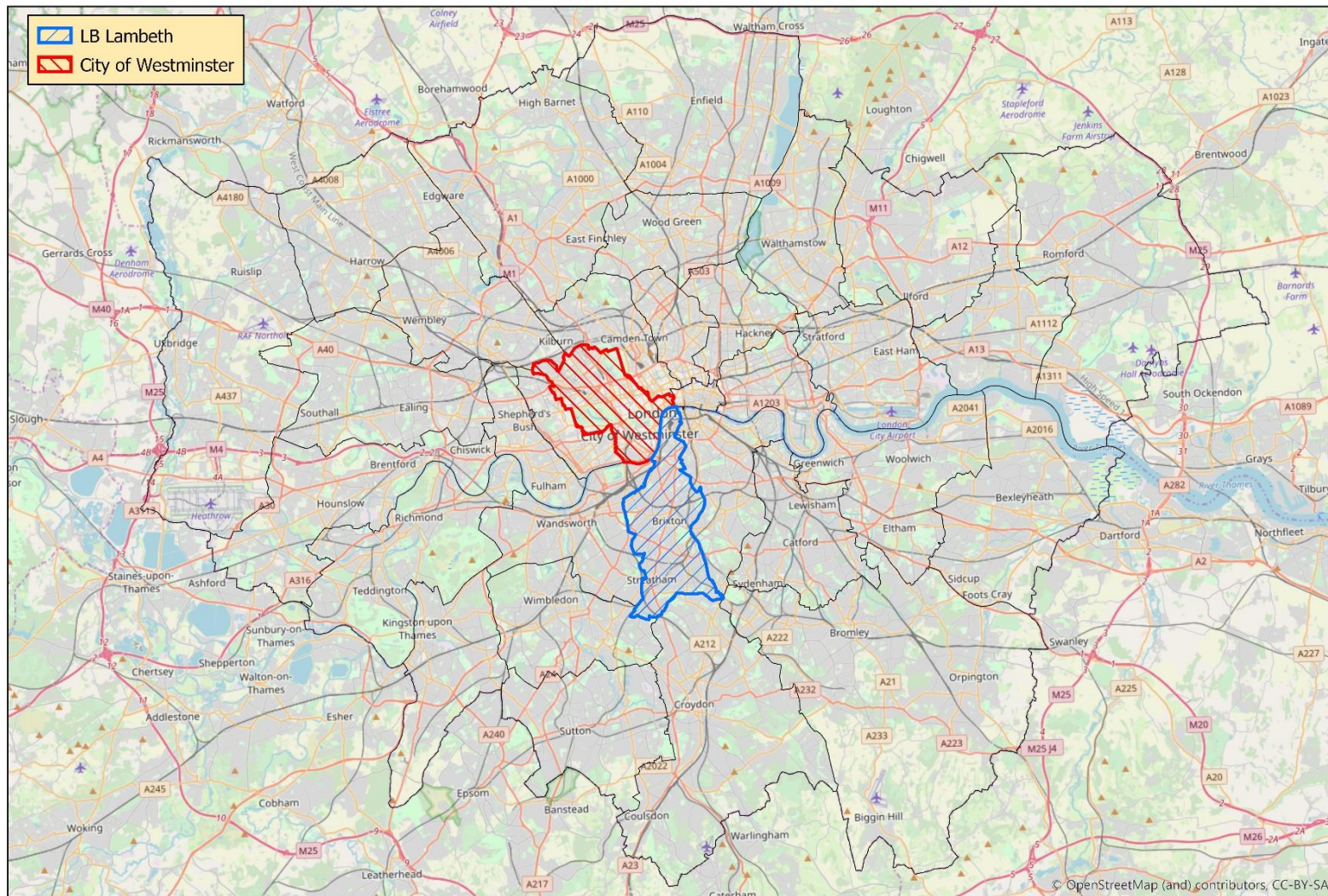
City of Westminster

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

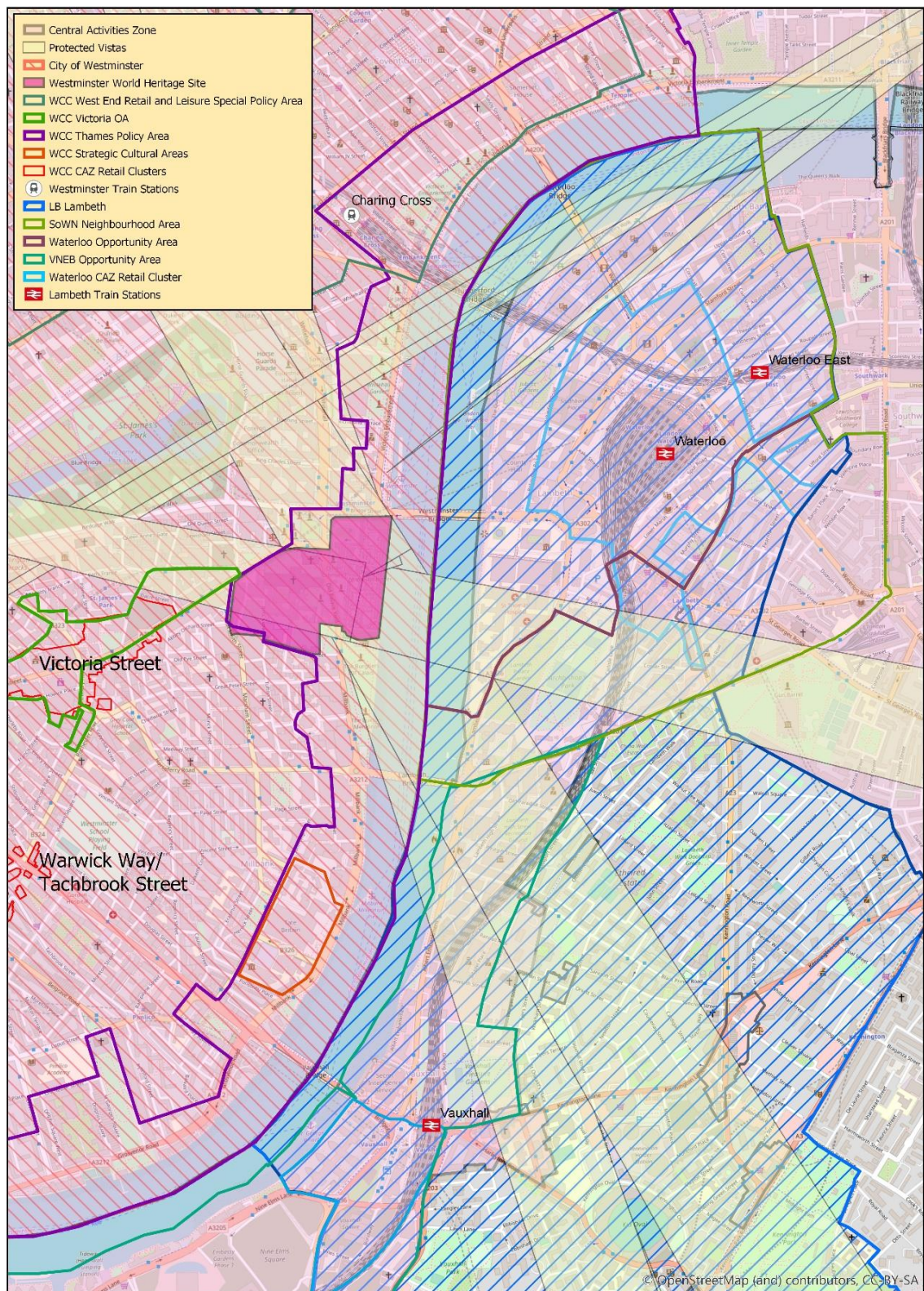
Map 2 – Boroughs involved in this Statement



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



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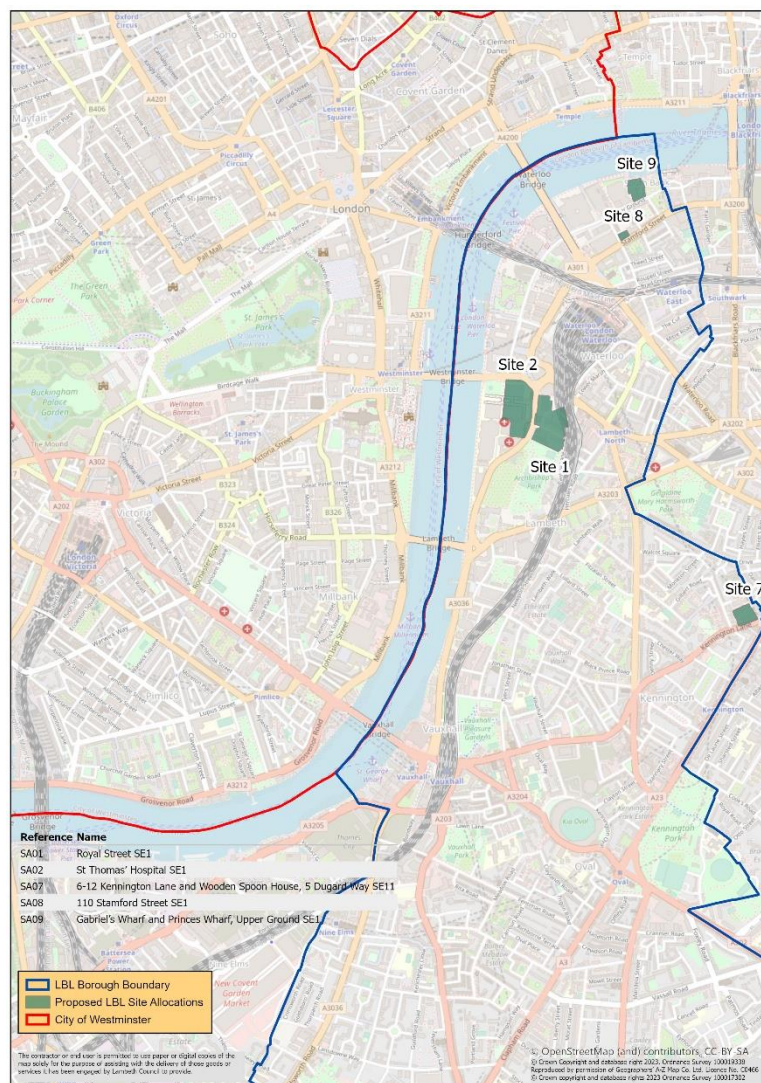
4. Strategic Matters

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

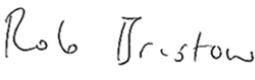

Table 2: Current Development Plan Documents being produced by the City of Westminster

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>London Borough of Lambeth</p> <p>Date: 25 January 2024</p>	<p>Signed: </p> <p>Name: Kimberley West</p> <p>Position: Head of Planning Policy</p> <p>City of Westminster</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](#)