

Statement of Common Ground between London Borough of Lambeth and the City of London December 2019



1. Executive Summary

This Statement of Common Ground has been prepared to demonstrate that both Lambeth's Draft Revised Lambeth Local Plan – Proposed Submission Version January 2020 (DRLLP PSV 2020) and the City of London's City Plan 2036 are 'based on effective joint working on cross-boundary strategic matters', in accordance with the requirements of paragraph 35 of the National Planning Policy Framework (NPPF). It focusses on areas of agreement or disagreement between Lambeth and the City of London on strategic cross-boundary matters.

Updates to this document will be agreed as matters progress and agreement is reached on any outstanding issues. It therefore includes details on mechanisms for review and updating.

Both councils' monitoring reports also provide further details of how the DRLLP PSV 2020 and the City Plan 2036 have been informed by ongoing engagement with key partners, including those that are not party to this Statement of Common Ground.

2. Parties involved

- London Borough of Lambeth
- City of London Corporation

3. Strategic geography

This section sets out the factual position regarding cross-boundary strategic matters.

The London Plan

The London Plan is the spatial development strategy for London, produced by the Greater London Authority on behalf of the Mayor of London. Every London borough local plan must be in general conformity with the London Plan. Together, the policies in the London Plan and in each borough's Local Plan constitute the statutory local development plan for that borough, along with any neighbourhood development plans once made.

It is worth noting that in a London context, collaboration on many strategic issues that go beyond borough boundaries (e.g. distribution of housing targets, identification of major areas of growth etc.) are largely addressed through the London Plan.

The London Plan is currently subject to a review and the Draft London Plan is undergoing examination at the time of writing. It is expected the replacement London Plan will be published (adopted) in early 2020.

Transport for London

Transport for London (TfL) is the integrated transport authority responsible for implementing the Mayor's Transport Strategy, which covers three key elements - healthy streets and healthy people, a good public transport experience and new homes and new jobs. The boroughs are required to work with TfL to support implementation of the Mayor's Transport Strategy.

TfL runs the day-to-day operation of the capital's public transport network (London Buses, London Underground, London Overground, Docklands Light Railway, TfL Rail and London Trams). Network Rail own, operate and develop London's railway infrastructure.

TfL also manages London's main roads (the Transport for London Road Network or TLRN). The London boroughs are responsible for all the other roads within their boundaries (other than the national motorway network, which is managed by Highways England).

The London Enterprise Panel

The London Enterprise Panel¹ (LEP) is the local enterprise partnership for London and is governed by the Mayor of London. It is the body through which the Mayor of London works with boroughs, business and TfL to take a strategic view of the regeneration, employment and skills agenda for London. Boroughs have historically engaged with the Mayor of London / GLA rather than directly with the LEP on relevant strategic planning matters. Both parties have effectively co-operated with the GLA regarding the development of its evidence base particularly in relation to business needs and likely changes in the market.

All London Green Grid

The 'All London Green Grid partnership' is recognised by DEFRA as the Local Nature Partnership for London. The partnership does not yet have a governance structure that allows it to respond on matters of local plan consultations.

Thames Water

Thames Water is the statutory water and sewerage undertaker for the area and is hence a "specific consultation body" in accordance with the Town & Country Planning (Local Development) Regulations 2012. From the 1st April 2018 all network reinforcement work required to support development will be delivered by Thames Water and funded through the Infrastructure Charge applied to each property connected to the water and wastewater networks. The Infrastructure Charge will also cover all modelling and design work required to deliver any necessary upgrades. The planning system will still play a key role in assisting that development does not outpace the delivery of any necessary infrastructure provision.

It will be essential that all development is aligned with any necessary water and sewerage infrastructure upgrades required to avoid any adverse impacts such as sewer flooding, pollution of land or watercourses and impacts of low/no water pressure. In line with Draft Revised Lambeth Local Plan policy EN4, Thames Water will, where appropriate, request phasing conditions are used to ensure that any new development or phase of development is not occupied until any necessary upgrades have been completed.

Thames Water are helping to deliver the Thames Tideway Tunnel project which will be a new fifteen-mile-long 'super sewer' running under the River Thames. A new interceptor sewer will be constructed west of Blackfriars Bridge in the City of London, creating a new open space in the City.

¹ Also known as the London Economic Action Partnership

LB Lambeth

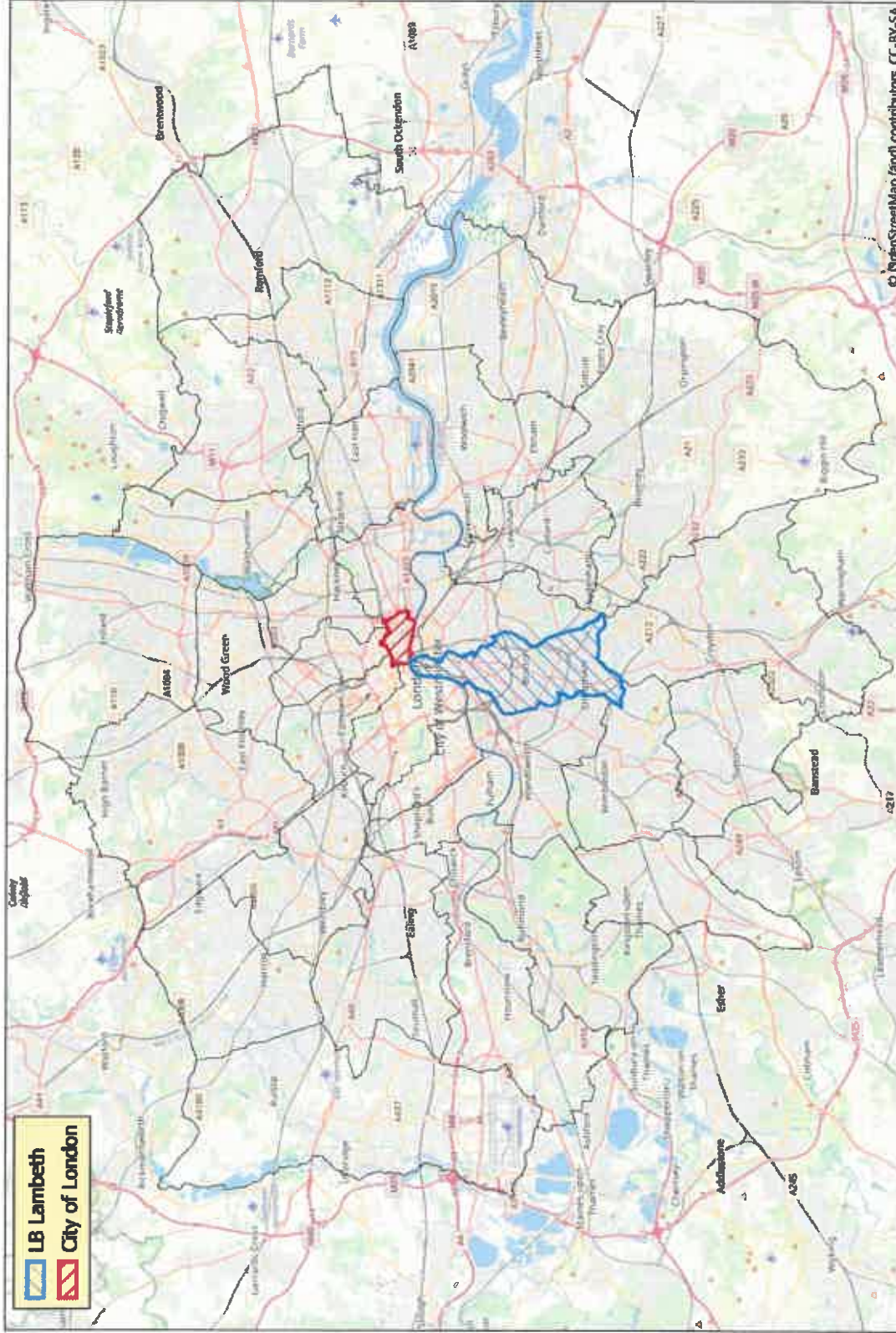
Lambeth is an inner London borough with a northern boundary on the River Thames. It is situated mainly between the boroughs of Wandsworth and Southwark. It covers an area of approximately ten and a half square miles. It is surrounded by seven other London Boroughs - LB Southwark; LB Bromley; LB Croydon;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

City of London

The City of London lies to the north of the River Thames and covers an area of just over a square mile. It is surrounded by the City of Westminster, LB Camden, LB Islington, LB Hackney, LB Tower Hamlets, LB Southwark and LB Lambeth. The City of London and Lambeth do not share a land border but sit on opposite sides of the River Thames with a small notional border.

This Statement includes the whole of the LB Lambeth and the whole of the City of London.

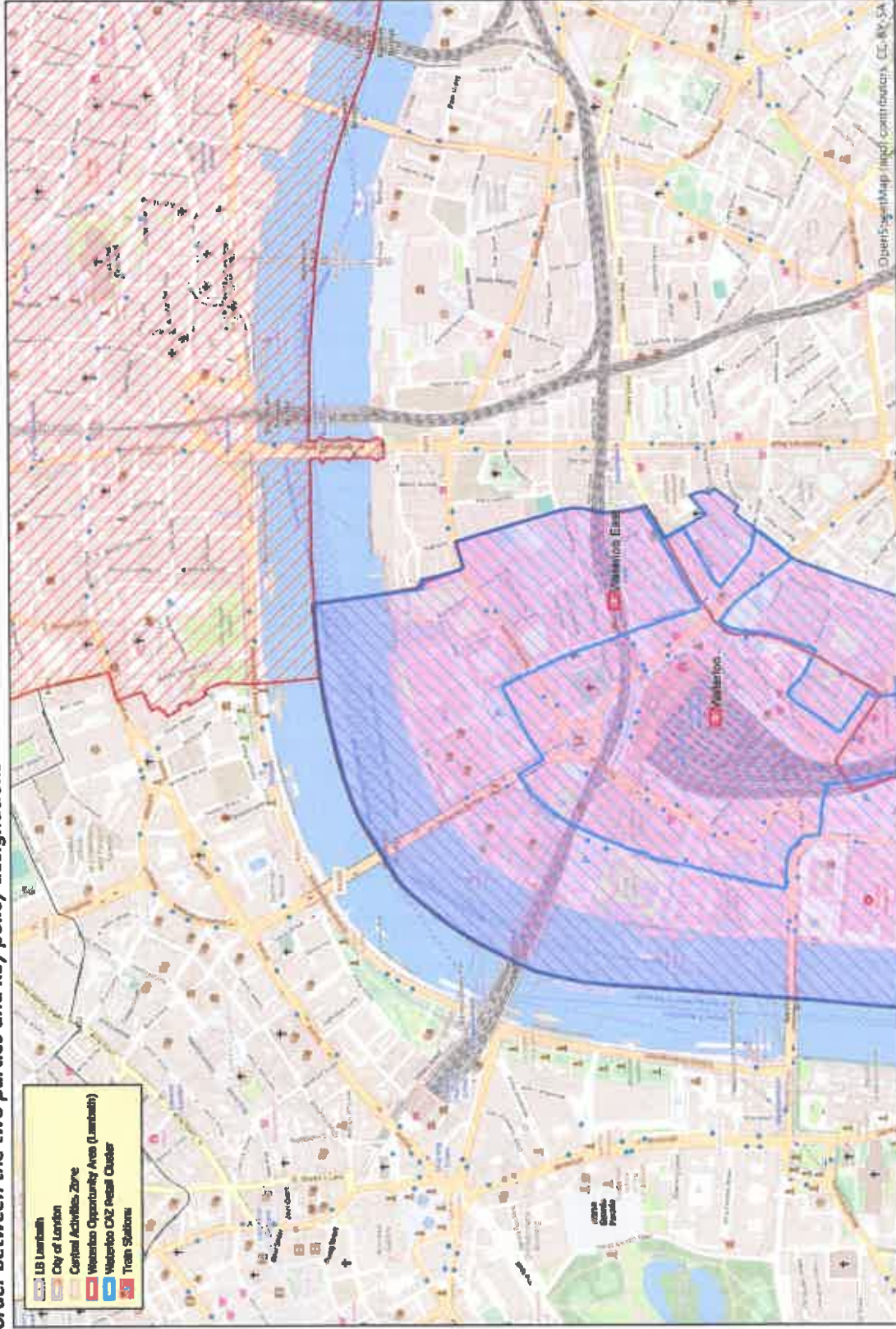
Map 1 – Map of authorities involved in this Statement



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Map 2 – Border between the two parties and key policy designations



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 Street Names and Station Names 2019 Ordnance Survey 2019/01/2019

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Neighbourhood planning

There are no designated neighbourhood planning areas spanning the borough boundary between the two parties.

Employment, retail, leisure and commercial development

Shared town centres

None.

Employment

Central Activities Zone



Figure 1 – Area of London Plan Central Activities Zone

The whole of the City of London and the area of Lambeth closest to the City (Waterloo) lies within the Central Activities Zone (CAZ). The CAZ is a London Plan designation. It contains a broad range of functions that have London-wide, national and international significance including Government, business, culture, research and education, retailing, tourism, transport and places of worship. The London Plan seeks to promote and enhance the agglomeration and rich mix of strategic functions and local uses in the CAZ, whilst also supporting and enhancing its significant office functions.

Transport

Main roads that cross the border between Lambeth and the City:
None.

Overground rail lines that cross the borough boundary and connect the two parties:
None.

Underground rail lines that cross the borough boundary and connect the two parties:
None.

Air quality

Air Quality Focus Areas spanning the borough boundary between the two parties:
None.

Flood risk

The Thames Barrier is managed and maintained by the Environment Agency and protects 125 square kilometres of central London from flooding caused by tidal surges. This includes the protection of just under 29,000 properties in Lambeth and 141 in the City who would otherwise be at risk of tidal and fluvial flooding. The Thames tidal defences also includes tidal walls and embankments along the banks of the River Thames. Should they fail or become breached the areas most at risk of flooding would be in the north of Lambeth and an area of the City within 200m of the Thames, but this could also impact on the surrounding neighbourhoods. The Environment Agency holds tidal breach modelling. This is also detailed within Lambeth's SFRA Tidal Breach addendum and the City of London's Strategic Flood Risk Assessment.

The Environment Agency's Thames Estuary 2100 Plan (November 2012) sets out the measures that require implementing to maintain adequate flood risk protection from the River Thames by the year 2100. The Plan identifies Lambeth and the City within Action Zone 2 – Central London. The Plan outlines a number of recommendations to mitigate flood risk within this zone, including to maintain, enhance or replace, the river defence walls and active structures through central London over the first 25 years of the Plan from 2010 to 2034, and then from 2035 to 2049. The plan advises that by 2065, the existing flood defences of the river wall will need to be raised by 0.5m and a further 0.5m by 2100.

Critical Drainage Areas

A Critical Drainage Area is a discrete geographic area (usually a hydrological catchment) where multiple and interlinked sources of flood risk (surface water, groundwater, sewer, main river and/or tidal) cause flooding in one or more Local Flood Risk Zones during severe weather thereby affecting people, property or local infrastructure. No Critical Drainage Areas span the borough boundary between the two parties.

The provision of energy (including heat)

The London heat map is an online tool, developed by the Mayor, used to find opportunities for decentralised energy (DE) projects in London. The Mayor has identified Heat Network Priority Areas, which can be found on the London Heat Map website. These identify where in London the heat density is sufficient for heat networks to provide a competitive solution for supplying heat to buildings and consumers. No existing or proposed heat networks cross the borough boundary between the two parties.

River Thames

Sites of Nature Conservation Importance (SINCs) that cross the borough boundary between the two parties:

- River Thames and Tidal Tributaries Metropolitan SINIC

Sites of Metropolitan Nature Importance that cross the borough boundary between the two parties:

- River Thames

The Thames Policy Area is a special policy area to be defined by boroughs in which detailed appraisals of the riverside will be required.

Strategic and local views

Strategic views which cross the borough boundary between the two parties:

- Protected Vista Westminster Pier to St Paul's Cathedral
- Protected Vista King Henry's Mound to St Paul's Cathedral

Local views from Lambeth into the City:

National Theatre (LV 1)	Queen Elizabeth Hall (LV 2)	Knight's Hill (LV 16)
Gipsy Hill (LV 17)	Brixton Panoramic (LV 19)	Norwood Park (LV 22)

St Paul's Heights Code viewpoints along South Bank and southern ends of Hungerford and Waterloo Bridges

The Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 (DRLLP PSV 2020) proposes to designate a new local view from Queen's Walk to St. Paul's Cathedral.

Local views from the City into Lambeth:

None

Heritage, design and conservation

Conservation areas in Lambeth adjoining City:

South Bank (CA38)

Conservation areas in the City adjoining Lambeth:

Temples Conservation Area

4. Strategic matters

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

4.1 Neighbourhood Planning

There are no designated neighbourhood planning areas spanning the borough boundary between the two parties.

4.2 Housing

4.2a. Overall housing need

Housing need is a strategic issue dealt with at the regional level in London by the Mayor. Within the Draft London Plan 2017 (consolidated with proposed further changes July 2019, plus EIP Panel recommendations), the Mayor sets borough-level housing targets. These targets are based on evidence of housing capacity in the capital set out in the London Strategic Housing Land Availability Assessment 2017 (London SHLAA 2017) and underwent examination during 2019. Through their own local plans, authorities must plan to meet or exceed their London Plan target to ensure they are in general conformity with the London Plan.

- Both parties agree that they can meet or exceed the total numerical housing target assigned to them by the Mayor of London in the Draft London Plan, within the confines of their own administrative boundary.

4.2b. Affordable housing

The London Plan and borough level Local Plans together set out the levels and types of affordable housing provision required.

- In terms of affordable housing, to ensure a consistent approach across London, both parties support the Mayor's threshold approach to affordable housing and the Mayor's strategic target of 50% affordable housing across London.

The City of London manages 126 flats on the William Blake Estate in Lambeth, which provides affordable housing for City of London tenants. The City of London also manages the City of London Almshouses (44 flats) and the Gresham Almshouses (8 flats) in Lambeth.

- Both parties agree to work collaboratively on any additional development or redevelopment of these properties and estates to deliver new affordable housing for City and Lambeth residents.

4.2c. Gypsies and Travellers

The City of London has a need for 0 pitches and is not planning to make provision.

Lambeth has a need for 3 pitches for gypsies and travellers between 2019/20 and 2034/35, which equates to one pitch every five years. There is no identified need for plots for travelling showpeople in the borough. Lambeth will meet the needs of Lambeth's gypsy and traveller community over this

period by safeguarding the existing gypsy and traveller site in Streatham Vale (Lonesome depot) and managing churn in vacant pitches on this site to meet identified future need.

- Both parties agree that on this basis neither borough has unmet need for gypsy and travellers accommodation

4.3 Employment, retail, leisure and other commercial development

The continued commercial success of the Central Activities Zone is vital to London's world city status. As supported by the Mayor of London, both parties have introduced Article 4 Directions within their portion of the CAZ to protect central London's strategically important office supply against change of use to residential use under permitted development rights.

- Both parties agree to work collaboratively to deliver the Draft London Plan approach to the CAZ and consult each other on major applications with potential strategic cross border impacts

4.4 Health

Health infrastructure planning in Lambeth reflects the priorities of the Lambeth Clinical Commissioning Group - this has had regard to and acknowledges potential movement of patients across the border between the two boroughs.

The City is working with the City and Hackney CCG in relation to planning for health facilities.

Both Lambeth and the City of London are home to regional hospitals that cater to health care needs beyond each administrative boundary.

- Both parties acknowledge that there is likely to be cross border movements of patients between Lambeth and the City but agree there are no known planning reasons why these movements cannot continue.

4.5 Education

Both parties have school place planning teams who seek to ensure that projected levels of demand for both primary school and secondary school places are met. Each party has undertaken a school place planning exercise which has had regard to cross-border movement of pupils between the two boroughs. The findings are reflected in the Lambeth Infrastructure Delivery Plan 2019 and will be reflected in the City of London Infrastructure Delivery Plan 2020.

- Both parties acknowledge that there is likely to be cross border movements of school pupils between Lambeth and the City but agree there are no known planning reasons why these movements cannot continue.

4.6 Telecommunications

- Both parties agree to work collaboratively on the delivery of digital connectivity infrastructure where there are cross-border implications

4.7 Security

- Both parties agree to work collaboratively on counter terrorism measures such as hostile vehicle mitigation where there are cross-border implications

4.8 Transport

Transport is by its nature a cross-border strategic issue - the approach in both local plans to managing the impacts of growth on the transport network can have significant impacts beyond the local authority boundary.

Lambeth supports the City's general approach to traffic reduction.

The draft City Plan requires all off-street parking facilities to be equipped with electric vehicle charging points. This is supported by Lambeth.

- Both parties agree to work collaboratively to deliver the Mayor's Transport Strategy outcomes with regards to walking and cycling
- Both parties agree to consult each other about proposed changes to traffic management and parking controls where these may have a cross-border impact
- Both parties agree to take a co-ordinated, with TfL, approach to bus corridors and bus priority measures.

4.9 Air quality

The whole of Lambeth is an Air Quality Management Area, with Air Quality Focus Areas defined in Draft London Plan paragraph 9.1.8. Lambeth has produced an Air Quality Action Plan. Lambeth proposes to follow the Draft London Plan policy approach to air quality in relation to new development.

City of London is also an Air Quality Management Area and has adopted an Air Quality SPD and an Air Quality Strategy was adopted in 2019.

- Both parties agree to continue their involvement in a number of cross-organisational projects to tackle poor air quality across London (see appendix 2).

4.10 Waste management

Each Waste Planning Authority is expected to plan for their identified waste needs, including planning to meet London Plan apportionment targets. Lambeth is planning for net self-sufficiency for LACW, C&I and C&D waste and a target of 95% beneficial use of excavation waste. Net self-sufficiency means providing enough waste management capacity to manage the equivalent of 100% of these waste streams generated in Lambeth, while recognising that some imports and exports will continue. This includes meeting the London Plan apportionment targets for the borough. Lambeth is planning for its identified waste needs by safeguarding existing waste sites and identifying sufficient land to provide opportunities to meet the waste management capacity gaps for the borough.

The City of London works collaboratively with the South East London Joint Waste Planning Group to meet its London Plan Waste Apportionment in full. The City of London Local Plan promotes a Circular Economy approach to waste.

There are no significant waste movements between Lambeth and the City of London, as set out in the Lambeth Waste Evidence Base 2019.

- Both parties acknowledge that there are no implications for either party as a result of each other's proposed position on waste

4.11 Water supply, wastewater

- Each party agrees to support Thames Water's approach to planning for water and waste water infrastructure

4.12 Flood risk

Flood risk in each borough is addressed through respective Strategic Flood Risk Assessment (SFRAs) and Local Plans planning policies. SFRAs assess the risk from all sources of flooding, this includes fluvial, tidal, surface water and foul water sources.

Each local authority is statutorily required to produce a Local Flood Risk Management Strategy (LFRMS) for their respective borough which details how they assess and will manage Local Flood Risk within their administrative boundary. LFRMSs require cross boundary partnership working to achieve the ultimate outcome of reducing Local Flood Risk. As part of the partnership working, Lambeth's and the City's Flood Risk Officers meet at quarterly Flood Group meetings, which form part of the reporting mechanism for the Thames Regional Flood and Coastal Committee. These meetings assist in collaborative working and also provide a platform for sharing knowledge and common issues in flood risk management.

- Both parties agree to have regard to each other's flood risk policies and evidence

4.13 Provision of energy (including heat)

Not applicable.

4.14 Green infrastructure (i.e SINCs and MOL)

Both parties are separated by the River Thames and therefore no green infrastructure crosses the borough boundary between the two parties.

4.15 Planning measures to address climate change mitigation and adaptation

Lambeth Council declared a Climate Emergency in January 2019. Lambeth has set itself a target to achieve net zero carbon for council operations by 2030. In July 2019, Lambeth published a corporate

carbon reduction plan which sets out initial actions to achieve this target, to be reviewed annually to ensure Lambeth is on track. Lambeth are also developing a wider Lambeth climate change response plan, which will be published in 2020. In the next eleven months Lambeth plans to engage widely, starting with a Citizens' Assembly early next year, to raise awareness, gather evidence and seek to build consensus around Lambeth's climate change response and the resulting action plan.

The City Corporation in July 2018 published a Responsible Business Strategy which outlined the Corporation's commitment to address issues posed by climate change. The Corporation is developing a Climate Action Strategy which will be published in 2020. This will outline actions taken to reduce carbon emissions and increase climate resilience in the City and set a credible target to achieve net zero carbon within the City.

The sections above relating to transport, waste, flood risk, provision of energy and air quality are all relevant to mitigating and adapting to climate change.

- Both authorities agree to follow the approach outlined in the London Plan for zero carbon developments (see DLP policy SI2) and support the principle of the Mayor's urban greening objectives

4.16 River Thames

4.16.1 Policy approach

The River Thames provides a major asset that Lambeth and the City of London border. Both authorities recognise the importance of this setting and have complementary policy approaches to shape future development within the area designated through the London Plan as the Thames Policy Area.

- Both parties agree to work collaboratively to implement policies affecting the London Plan Thames Policy Area

4.16.2 River services

- Both parties agree to work collaboratively to improve both passenger transport on the River and use of the River for freight movements.

4.16.3 Sites of Importance for Nature Conservation

- Both parties agree to consult each other on any proposals that could impact on the River Thames and Tidal Tributaries Metropolitan SINC.
- Both parties agree to have regard to the River Thames and Tidal Tributaries Metropolitan SINC designation and each other's respective Local Plan policies when determining applications that could impact on this designation. Both parties agree to work collaboratively to ensure that development does not have an adverse impact on the SINC

4.17 Strategic and local views

Strategic and local views

Within Lambeth, areas appropriate for tall buildings have been identified in the draft revised Lambeth Local Plan Annex 11, supported by policy Q26. Protected Views are covered by DRLLP policy Q25.

Within the City of London, areas inappropriate for tall buildings have been identified in the draft City plan 2036.

The City Plan 2036 includes a St Paul's Heights policy. This is referenced in the supporting text to DRLLP policy Q25.

- Both parties agree to have regard to cross border strategic and local views when determining applications, and consult each other on any proposals that could impact on these views. Lambeth agrees to protect views of St Paul's, under the St Paul's Heights code, from identified viewpoints on the South Bank and the southern ends of Waterloo and Hungerford Bridges.

4.18 Cultural infrastructure

The Southbank/Bankside/London Bridge area is designated in the Draft London Plan as a strategic cluster of cultural attractions. This area crosses the borough boundary between the Lambeth and Southwark and lies adjacent to the boundary with the City of London.

- Both parties acknowledge that this area could result in cross border movements of people between Lambeth and the City but agree there are no known planning reasons why these movements cannot continue.

5 Governance arrangements

This statement has been informed by on-going engagement between the two parties – as evidenced by the main body of the statement explaining joint working and the schedule of engagement between the parties in Appendix 1.

This statement of common ground is a live document and will be reviewed on a regular basis, 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

Local authority	Present plan adoption	Reg. 18 date	Anticipated Reg. 19 date	Anticipated submission date
Lambeth	September 2015	October 2018	January 2020	Spring 2020
City of London	January 2015	November 2018	May 2020	Summer 2020

Table 1: Plan review, update and submission dates

Ongoing collaboration between the parties will continue through regular meetings and through attendance at group meetings where cross boundary issues are discussed.

6 Signatories

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 Local Plan 2020 and the Draft City Plan 2036 and both parties will continue to work collaboratively in order to meet the duty to cooperate.

For the City of London the Statement of Common Ground is signed by the Policy and Performance Director with political oversight from the Chair and Deputy of the Planning & Transportation Committee.

Signed: Matthew Bennett

Name: Councillor Matthew Bennett

Position: Cabinet Member for Planning, Investment & New Homes,

London Borough of Lambeth

Date: 08/01/2020

Signed: Paul Beckett

Name: Paul Beckett

Position: Policy and Performance Director

City of London

Date: 12/12/2019

Appendix 1 - Schedule of engagement between the parties

Officer-level meetings to discuss strategic cross border planning matters under the duty to co-operate and to develop this statement of common ground took place:

- 21st January 2016 (with Southwark)
- 15th September 2017 (also with LB Tower Hamlets and Southwark)
- 5th December 2018
- 30th October 2019

Air quality meetings/projects:

Project	Partner
London Councils work into new AQ legislation	City and London Councils (lead), various other boroughs
Healthy Streets Everyday	Islington (lead), Cross River Partnership, 15 other boroughs, GLA (funders) – TBC
Non Road Mobile Machinery register	King’s College London, GLA, TFL, Brent, Camden, Croydon, Hammersmith and Fulham, RBKC, Islington, Lewisham, Tower Hamlets, Wandsworth, and Westminster.
Air Quality Monitoring Network	King’s College London
Breathe London Project	GLA (lead), University of Cambridge, King’s College London, AirMonitors, CERC, Environmental Defence Fund, Google Earth Outreach, National Physical Laboratory, C40 Cities.
airTEXT service	Islington Council (Current lead), University of Cambridge, London boroughs, GLA, Chelmsford, Colchester, Slough, Three Rivers, Thurrock, Environment Agency, Public Health England, CERC, European Commission, DEFRA, PREVAIR and European Space Agency
Pollution alerts to schools, GP surgeries and care homes	GLA, King’s College London
Ultra Low Emission Zone	GLA
Statutory duties as Air Quality Management Area	GLA, Defra
London wide idling engine programme	City and Camden (lead), GLA, London boroughs

Table 2: List of projects both parties are part of taking place in London to monitor and improve air quality.

Air quality organisations:

Organisation	Participating authorities	Frequency
Central London Air Quality Cluster Group	WCC, Hammersmith and Fulham, Camden, Islington, City of London, Hackney, Southwark, Lambeth, London Councils, GLA	Quarterly
APRIL Network (Air Pollution Research in London)	All boroughs, GLA, TfL, research institutions	Quarterly

Table 3: List of organisations both parties are part of taking place in London to monitor and improve air quality.

Flood officer meetings:

Lambeth's and the City of London's Flood Officers meet at quarterly Flood Group meetings, which form part of the reporting mechanism for the Thames Regional Flood and Coastal Committee. These meetings assist in collaborative working and also provide a platform for sharing knowledge and common issues in flood risk management.

All London Borough planning officer meetings (Association of London Borough Planning Officers):

- 13th Jan 2016
- 21st June 2016
- 27th July 2016
- 13th October 2016
- 9th Feb 2017
- 14th March 2017
- 16th May 2017
- 16th February 2018
- 1st May 2018
- 3rd July 2018
- 18th September 2018
- 13th November 2018
- 25th January 2019
- 07th February 2019
- 12th March 2019
- 04th April 2019 (sub group meeting)
- 07th May 2019
- 05th June 2019 (sub group meeting)
- 16th July 2019
- 25th July 2019
- 17th September 2019
- 19th September 2019 (sub group meeting)
- 12th November 2019

Appendix 2 - Evidence of activities undertaken to address an issue

Local Plan consultations:

On 9th October 2017, Lambeth notified the City of London that the first stage of public consultation on the Lambeth Local Plan Review (Regulation 18 part 1 - Issues consultation) would run for eight weeks from 9 October to 4 December 2017. Lambeth invited the City to make representations.

On 22nd October 2018, Lambeth notified the City of London that the second stage of public consultation on the Lambeth Local Plan Review (regulation 18 part 2 - Draft Revised Lambeth local Plan 2018) would run for eight weeks from 22 October to 17 December 2018. Lambeth invited the City of London to make representations.

On 19 September 2016, the City Corporation notified Lambeth of the first stage of public consultation on City Plan 2036 (Regulation 18 – Issues and Options). The consultation ran between 19 September and 31 October 2016. The City Corporation invited Lambeth to make representations.

On 12 November 2018, the City Corporation notified Lambeth of the second stage of consultation on City Plan 2036 (Regulation 18 – full draft Plan). The consultation ran from 12 November 2018 until 28 February 2019. The City Corporation invited Lambeth to make representations.

Schedule of representations received from the City in the Issues consultation 2017

On 4th December 2017, the City of London Corporation submitted comments to Lambeth as part of the Issues consultation. The City welcomed Lambeth's proposed approach to increasing green infrastructure in new developments and improving air quality. The City also noted that, any re-provision of waste sites outside Lambeth would need to be agreed through a pooling of the relevant London Plan waste apportionment targets so that London can meet its net-self-sufficiency target.

Schedule of representations received from the City in the DRLLP consultation 2018

On 14th December 2018, the City of London Corporation submitted comments on the Draft Revised Lambeth Local Plan 2018. The table below outlines the points made by the City and the proposed Lambeth response.

Representation Wording	Plan Section	Policy/Sites/General /Policies Map/Issue	Officer Response	Proposed Change in DRLLP PSV
<p>Thank you for consulting the City of London Corporation on the Draft Revised Lambeth Local Plan (October 2018) and for the opportunity to comment.</p> <p>We note that the revised Local Plan updates the spatial strategy, vision and strategic objectives of the Lambeth Local Plan adopted in September 2015. We look forward to engaging positively with Lambeth now and in the future.</p>	General	Duty to Cooperate	Noted.	No change.
<p>We do not have any comments to make although we note and welcome Lambeth's proposed approach to increasing the quality of open space and green infrastructure in new developments and improving air quality.</p>	General	General	Noted.	No change.
<p>We also welcome the inclusion of the City of London's St Paul's Heights policy and London Views Management Framework (LVMF).</p>	Section 10	Q25	Noted.	No change