

Statement of Common Ground between  
London Borough of Lambeth and London  
Borough of Southwark

December 2019

## 1. Executive summary

This Statement of Common Ground (SCG) has been prepared to demonstrate that the New Southwark Plan Submission Version (NSPSV 2019) – proposed submission late 2019 and Lambeth’s Draft Revised Lambeth Local Plan – Proposed Submission Version January 2020 (DRLLP PSV 2020) 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). This SCG focuses on strategic cross-boundary matters being addressed and progress in cooperating to address them.

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.

Southwark’s Duty to Co-operate Statement and Lambeth’s AMRs also provide further details of how both plans 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
- London Borough of Southwark

The NSPSV 2019 was submitted to the Secretary of State on 9<sup>th</sup> December 2019.

Given the close alignment of both Southwark and Lambeth’s local plan productions timetable, both parties have agreed to develop a single bi-lateral SCG which will serve both local plan submissions.

## 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 Examination Panel report has been published, and the plan is expected to be adopted in 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 Panel<sup>1</sup> (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. 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 in line with DRLLP EN4 and NSP P68.

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.

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<sup>1</sup> Also known as the London Economic Action Partnership

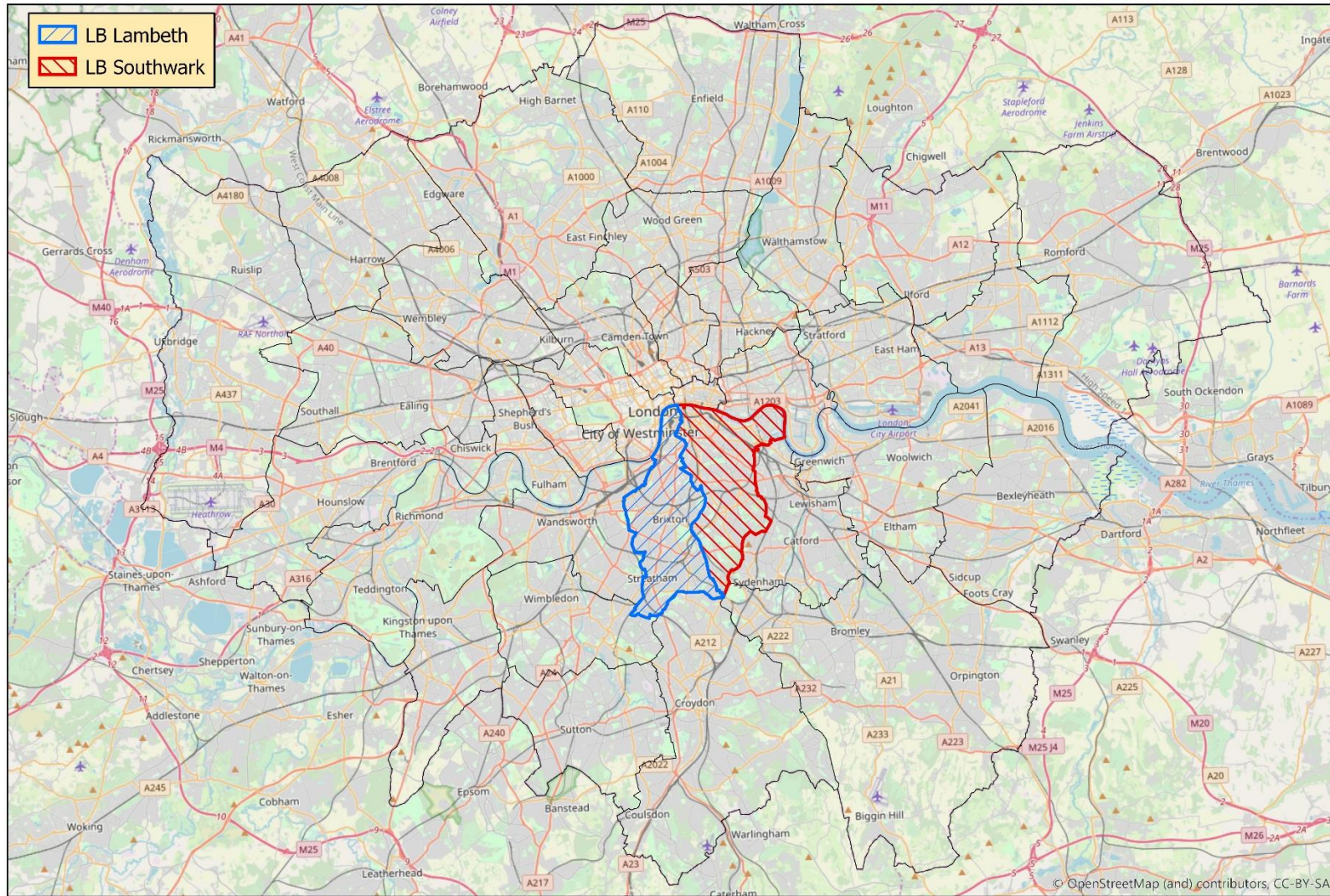
## **LB Lambeth**

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.

## **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).

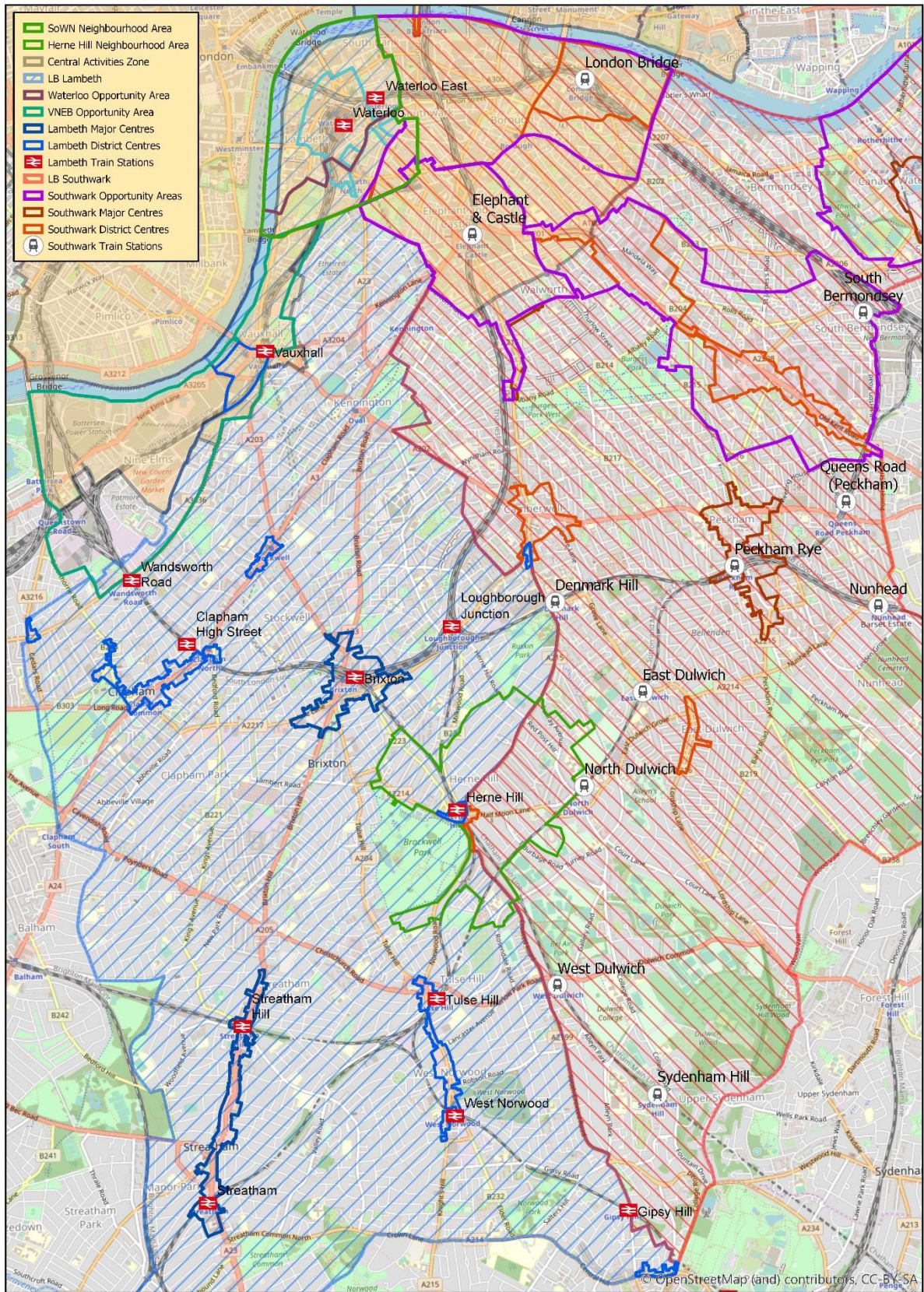
Map 1 – Map of parties involved in this Statement



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



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## **Neighbourhood planning**

Two designated neighbourhood areas cross the borough boundary between the two parties.

### *South Bank and Waterloo Neighbours*

South Bank and Waterloo Neighbours (SoWN) were designated by both Lambeth and Southwark as a neighbourhood forum and area in February 2014. They were subsequently re-designated by both authorities in February 2019. SoWN is a designated business area.

SoWN submitted their Draft Neighbourhood Plan to Lambeth and Southwark on 19 June 2018. Both authorities considered the legal compliance of the submitted documents and made a decision to proceed to publication and examination. The Plan subsequently underwent examination and the examiner's report was published in May 2019. In July 2019 Lambeth and Southwark each made the decision to accept all of the Examiner's recommendations to modify the draft neighbourhood plan. It was agreed that subject to these modifications, the draft neighbourhood plan should be sent to two referendums: one for residents and one for businesses.

The two referendums took place on 24 October 2019 and more than half of those voting voted in favour of the NDP in each referendum. The results of the referendum mean the draft NDP now forms part of Lambeth's development plan. The next stage in the process will be a Cabinet decision by both Lambeth and Southwark on the making of the draft NDP in December.

### *Herne Hill Neighbourhood Forum*

In December 2017, Lambeth and Southwark each approved the designation of the Herne Hill Neighbourhood Area. However, the application for the Herne Hill Neighbourhood Forum made by the Herne Hill Forum was refused. There has been no subsequent application to designate a neighbourhood forum.

## **Employment, retail, leisure and other commercial development**

### *Shared town centres:*

- Camberwell Green (district centre)
- Herne Hill (district centre)
- Camberwell New Road (local centre)

## Employment:

### Central Activities Zone

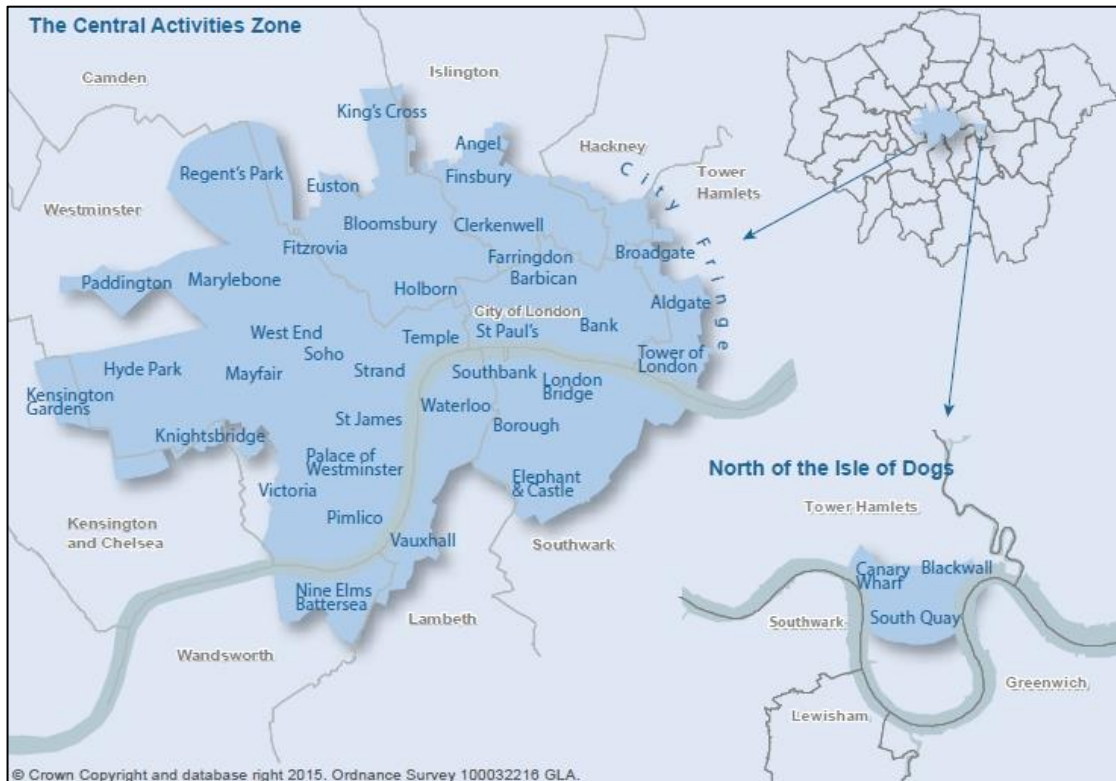


Figure 1 – Area of London Plan Central Activities Zone

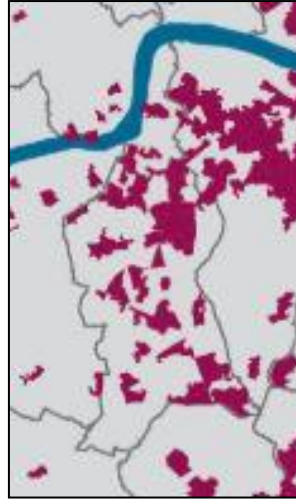
Areas of both boroughs lie within the Central Activities Zone (CAZ). The CAZ is a London Plan designation. It contains a broad range of functions that have London-wide, national and international significance including Government, business, culture, research and education, retailing, tourism, transport 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.

### Strategic Areas for Regeneration

As outlined by Draft London Plan policy SD10, there are parts of London where the impacts of inequality and causes of deprivation are particularly concentrated. Based on the Index of Multiple Deprivation (IMD), many of the city's neighbourhoods lie within the 20 per cent most deprived areas in England. The Draft London Plan identifies these neighbourhoods as Strategic areas for regeneration (SARS).

As shown on map below there are SARS which adjoin/cross the borough boundary between the two parties:





*Figure 2 - Strategic Areas for Regeneration (based on 20 per cent most deprived lower super output areas in England)*

## **Transport**

Main roads that cross the border between Lambeth and Southwark:

- A3200 (Stamford Street) is part of the TfL Road Network
- A301 (Waterloo Road) is a London Distributor Road
- A3202 (Westminster Bridge Road) is a London Distributor Road
- A302 (St Georges Road) is a London Distributor Road
- A3203 (Lambeth Road) is a London Distributor Road
- A3204/A3 (Kennington Lane/Newington Butts) is part of the TfL Road Network
- A3 (Kennington Park Road/Newington Butts) is part of the TfL Road Network
- A202 (Camberwell New Road) is part of the TfL Road Network
- A2217 (Coldharbour Lane/Denmark Hill) is a London Distributor Road
- A215 (Denmark Hill/Herne Hill/Norwood Road) is a London Distributor Road
- A2199 (Croxted Road/South Croxted Road) is a London Distributor Road
- A205 (Thurlow Park Road) is part of the TfL Road Network

Overground rail lines that cross the borough boundary and connect the two parties:

- South Eastern mainline between London Waterloo East and London Bridge
- Thameslink line between between Loughborough Junction and Elephant and Castle
- Overground line between Clapham High Street and Denmark Hill
- South Eastern line between Herne Hill and West Dulwich
- Southern line between Tulse Hill and North Dulwich

Overground stations on lines that cross the borough boundary and connect the two parties:

- London Waterloo East (Lambeth)
- London Bridge (Southwark)
- Loughborough Junction (Lambeth)
- Elephant and Castle (Southwark)
- Clapham High Street (Lambeth)
- Denmark Hill Station (Southwark)
- Herne Hill Station (Lambeth)
- West Dulwich Station (Southwark)

- Tulse Hill (Lambeth)
- North Dulwich (Southwark)

Underground rail lines that cross the borough boundary and connect the two parties:

- Jubilee Line
- Northern Line

Underground stations on lines that cross the borough boundary and connect the two parties:

- Waterloo (Lambeth)(Jubilee Line)
- Southwark (Southwark)(Jubilee Line)
- Kennington (Lambeth)(Northern Line)
- Elephant and Castle (Southwark)(Northern Line)

### *Bakerloo Line Extension*

The Bakerloo Line Extension (BLE) is a key element of the growth strategy in the London Plan, which would extend the Bakerloo Line into Southwark and Lewisham. The Mayor of London has committed to accelerating its delivery. The extension is being progressed through the growth partnership and the members are working together to expedite it. Southwark are working with TfL and Lambeth on the case for the new rail station at Camberwell. The delivery of the BLE would enable the Old Kent Road and New Cross and Catford OAs to maximise their development potential, supporting London's continued growth and long-term economic success.

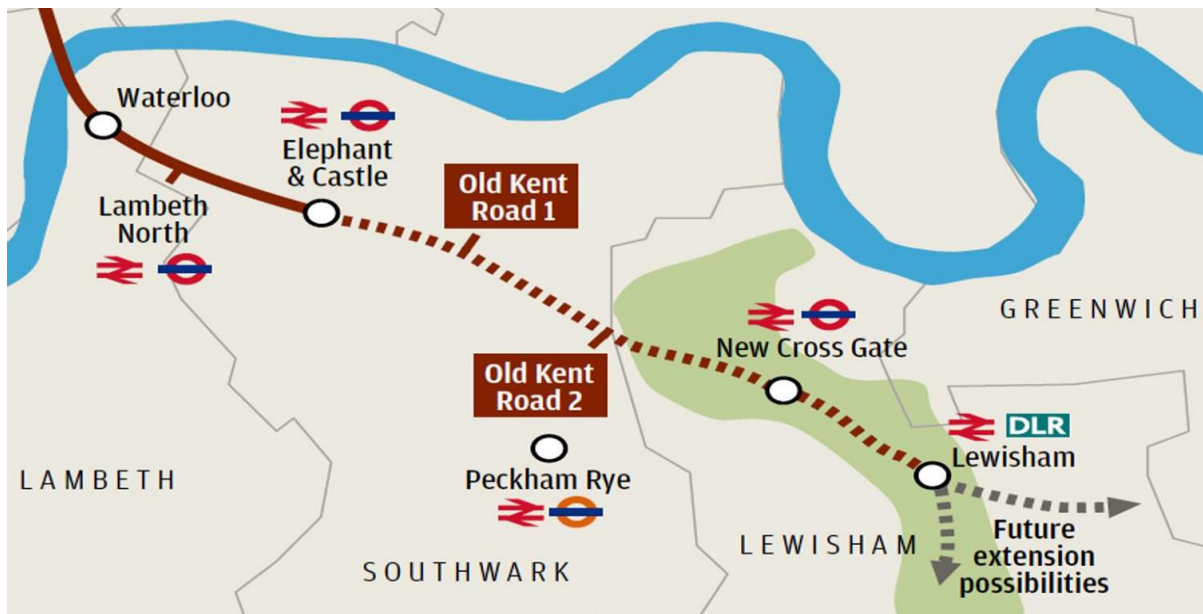


Figure 3 - The proposed route of the Bakerloo Line Extension.

### *Low Line project*

The Low Line is a new walking route alongside railway viaducts which connects neighbourhoods. The purpose of the Low Line is to improve walking and cycling links along and through railway viaducts. The Low Line is opening up a wide variety of opportunities. The aspiration is to extend the project which originated in Southwark into Lambeth.

## **Air quality**

Air Quality Focus Areas spanning the borough boundary between the two parties:

- Waterloo Road
- Elephant and Castle to St George's Circus
- Walworth Road/Camberwell Road/Camberwell Green
- Herne Hill Croxted Road/Half Moon Lane/Dulwich Road/Norwood Road

## **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 95,000 in Southwark who would otherwise be at risk of tidal and fluvial flooding. The Thames tidal defences also include 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 the boroughs, 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.

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 Southwark 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.

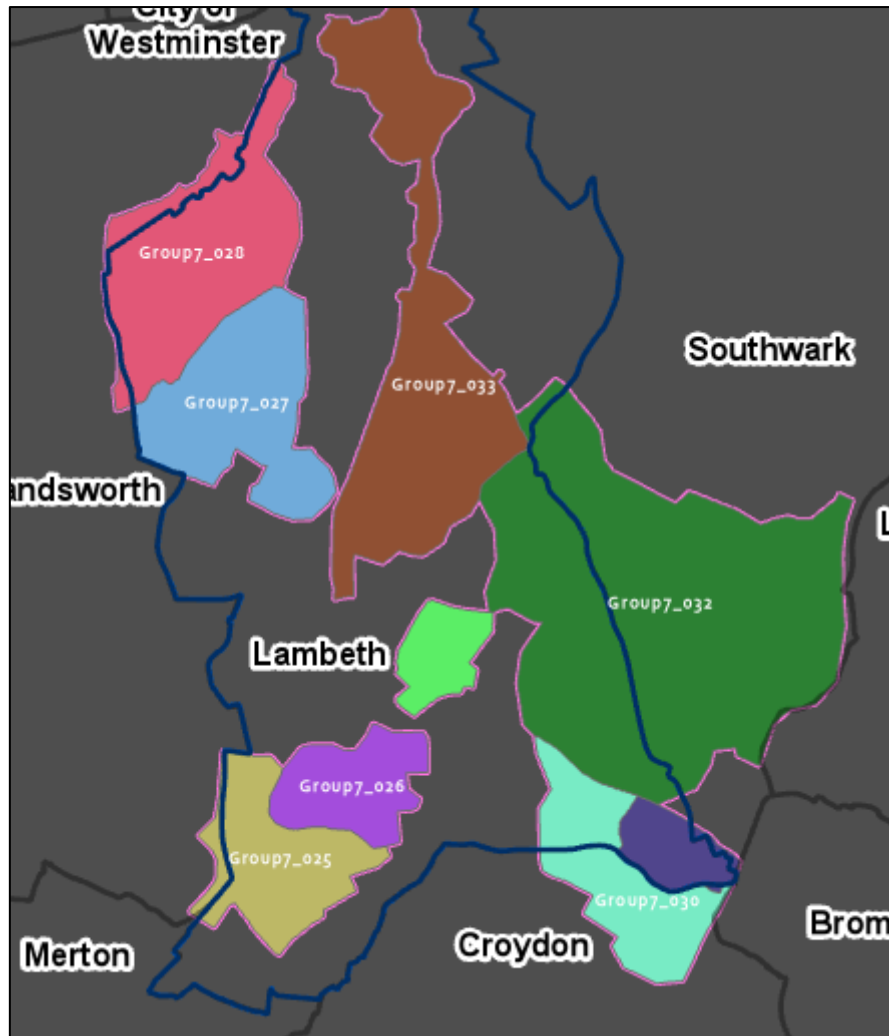


Figure 3 - Map of CDA(s) in Lambeth

Critical Drainage Areas spanning the borough boundary between the two parties:

- Group7\_031
- Group7\_032

### The provision of energy (including heat)

The Draft London Plan states that boroughs should engage at an early stage with relevant energy companies and bodies to establish the future energy and infrastructure requirements arising from large-scale development proposals such as Opportunity Areas, Town Centres, other growth areas or clusters of significant new development (see DLP policy SI3). It also states that development plans should identify the need for, and suitable sites for, any necessary energy infrastructure requirements including energy centres, energy storage and upgrades to existing infrastructure. Furthermore boroughs should identify existing heating and cooling networks, identify proposed locations for future heating and cooling networks and identify opportunities for expanding and inter-connecting existing networks as well as establishing new networks.

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.

The London Heat Map identifies proposed heat networks that cross the borough boundary between the two parties at:

- Upper Ground
- Lothian Road/Wyndham Road
- Denmark Road/Carew Street/Warner Road
- Lowth Road/Caldecot Road
- Bessemer Road/Denmark Hill/De Crespigny Park
- King's College Hospital

### **Green infrastructure**

Metropolitan Open Land (MOL) in Lambeth adjoining Southwark:

- Brockwell Park MOL

Sites of Nature Conservation Importance (SINCs) in Lambeth adjoining Southwark:

- Brockwell Park SINC
- Ruskin Park SINC
- Railway Lineside - Peabody Hill including Acid Grassland SINC
- Kennington Park SINC

Metropolitan Open Land (MOL) in Southwark adjoining Lambeth:

- Geraldine Mary Harmsworth Park
- Burbage Road Playing Fields
- Dulwich College Sports Grounds
- Belair Park
- Dulwich Upper Wood.

Sites of Nature Conservation Importance (SINCs) in Southwark adjoining Lambeth:

- Geraldine Mary Harmsworth Park
- Belair Park
- Sydenham Hill and West Dulwich Railsides
- Long Meadow
- Gypsy Hill Railway Cutting.

### **River Thames**

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

- River Thames and Tidal Tributaries Metropolitan SINC

Sites of Metropolitan Nature Importance that cross the borough boundary:

- River Thames

The Thames crosses the borough boundary between the two parties. There are River services on the Thames for both passengers and freight.

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 Parliament Square to Palace of Westminster
- Protected Vista Primrose Hill to Palace of Westminster
- Protected Vista King Henrys Mound to St Pauls Cathedral
- Protected Vista Westminster Pier to St Pauls Cathedral

### Local views from Lambeth into Southwark:

- Dasset Road (LV 15)
- Knight's Hill (LV16)
- Gypsy Hill (LV17)
- Brixton Panoramic (LV 19)
- Norwood Park (LV 22)

There are no local or borough views from Southwark into Lambeth.

## **Heritage, design and conservation designations**

### Conservation areas in Lambeth adjoining Southwark:

- South Bank (CA38)
- Waterloo (CA34)
- Mitre Road and Ufford Street (CA51)
- Lambeth Walk and China Walk (CA50)
- Walcot (CA09)
- Kennington (CA08)
- St Marks (CA11)
- Vassal Road (CA07)
- Minet Estate (CA25)
- Herne Hill (CA61)
- Brockwell Park (CA39)
- Gipsy Hill (CA14)

### Conservation areas in Southwark adjoining Lambeth:

- Dulwich Village (7)
- Sunray Estate (39)
- Camberwell Grove (4)
- Camberwell Green (20)
- Camberwell New Road (5)
- Kennington Park Road (9)
- Elliot's Row (46)
- West Square (14)
- Valentine Place (44)
- Old Barge House Alley (23)

### Historic parks and gardens in Lambeth adjoining Southwark:

- Kennington Park, Ruskin Park and Brockwell Park.

### Historic parks and gardens in Southwark adjoining Lambeth:

- Belair Park

Archaeological priority areas in Lambeth adjoining Southwark:

- North Lambeth APA2
- Roman Road APA3
- Camberwell APA17

Archaeological priority areas in Southwark adjoining Lambeth:

- North Southwark and Roman Roads (APA1)
- Camberwell Village (APA3)

**Cultural infrastructure**

*Strategic Cultural Cluster designation in the London Plan*

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 two parties and comprises a number of world class arts venues and galleries.

## 4. Strategic matters

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

### 4.1 Neighbourhood Planning

- Both parties **agree** to work collaboratively on emerging cross border decisions relating to neighbourhood plans.

### 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.

#### *4.2c. Gypsies and Travellers*

Southwark has four authorised traveller sites providing 39 pitches (three of which are double pitches). This is the fourth largest provision in London (7% of the total authorised pitch provision). The four official sites in Southwark that are available for Gypsies and Travellers are located at:

- Ilderton Road
- Brideale Close
- Burnhill Close
- Springtide Close.

Southwark are currently in the process of completing a Needs Assessment with regards to Gypsies and Travellers within the borough of Southwark, which will be released by the end of 2019. This will become part of the evidence base for the New Southwark Plan.



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.

- Southwark **agrees** that Lambeth have no unmet need.
- Lambeth cannot comment until the findings of the Southwark needs assessment are published.

#### 4.3 Employment, retail, leisure and other commercial development

##### *Central Activities Zone*

The continued commercial success of the Central Activities Zone, which covers northern areas of both Southwark and Lambeth 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.

##### *Visitor accommodation*

DRLLP PSV 2020 policy ED14 proposes to introduce a new policy to restrict any further visitor accommodation in Waterloo within the boundary of the Central Activities Zone.

- Both parties **agree** to work collaboratively to manage the growth of visitor accommodation around Waterloo to ensure the most effective mix of land uses in that part of the CAZ.

##### *Shared town centres*

- Both parties **agree** to have regard to their respective policy approaches to shared town centres in their respective local plans.
- Both parties **agree** to share monitoring information and analysis of the health of shared town centres – particularly where analysis suggests emerging issues that may require joint action.

#### 4.4 Health

The six south east London CCGs (Bexley, Bromley, Greenwich, Lambeth, Lewisham and Southwark) received approval to merge from 1 April 2020. This merger will enable the new South East London CCG to work in greater partnership with local authorities in each borough; and commission services for those patient pathways that span the entire south east London integrated care system.

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

NHS Southwark Clinical Commissioning Group (CCG) is a key partner, working with Southwark to ensure that development improves health services and health outcomes for Southwark's residents. Under the Health and Social Care Act (2012) Health and Wellbeing Boards were set up to improve integration between practitioners in local health care, social care, public health and related public services.

Southwark council has worked with the CCG to align the New Southwark Plan, Old Kent Road Area Action Plan/Opportunity Area Planning Framework and an estates strategy for local health facilities. Together they will ensure that the need for new healthcare floorspace and the transformation of services are achieved.

Our Healthier South East London programme (OHSEL) is a proposal devised by the six CCGs covering the London Boroughs of Bexley, Bromley, Greenwich, Lambeth, Lewisham and Southwark. OHSEL is the body responsible for the delivering the Sustainability & Transformation Plans (STPs) for the six boroughs.

Both Lambeth and Southwark are home to regional hospitals that cater to health care needs beyond each administrative boundary.

- Both parties **agree** to work collaboratively under the OHSEL programme.
- Both parties acknowledge that there is likely to be cross border movement of patients between each borough but **agree** there are no known planning reasons why these movements cannot continue.
- Both parties **agree** to work collaboratively to plan for strategic cross border health facilities.

#### 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 the Southwark Infrastructure Delivery Plan (2017).

- Both parties acknowledge that there is cross border movement of school pupils between each borough 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 as required.

#### 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.

#### *Bakerloo Line Extension*

- Both parties **agree** to work collaboratively to support the business case of the Bakerloo Line extension and other strategically important transport infrastructure, such as Crossrail 2.
- Both parties **agree** to work collaboratively to minimise construction impacts that result from cross border transport projects such the Bakerloo line extension.
- Both parties **agree** to work collaboratively to ensure that any impacts to the amenity of nearby residents arising from the BLE in both boroughs are mitigated.

#### *Active travel*

- Both parties **agree** to work collaboratively to deliver the Mayor's Transport Strategy outcomes with regards to walking and cycling.
- Both parties **agree** to strategically co-ordinate the delivery of a healthy route between Brixton and Camberwell.
- Both parties **agree** to work collaboratively to deliver the Low Line project to the south of Camberwell.
- Both parties **agree** to work collaboratively, and with TfL, to deliver to Cycle future route 14 on Camberwell New Road.
- Both parties **agree** to work collaboratively to deliver the Central London Bike Grid.

#### *Car parking*

Southwark has a car-free approach to car parking. Southwark's Cycle and car parking standards SPD (2015) sets out the borough's residential car provision for areas based on PTAL score and the adopted London Plan recommendations. Within PTAL zones 6 and 5, no car parking space may be provided, with a maximum of 2 spaces per unit in PTAL zones 1 and 2. A minimum of 1 cycle parking space must be provided for all units regardless of PTAL zone.

Approximately 50% of Southwark offers parking zones, accounting for 23 zones in total. The primary reason for the zone restrictions is to give parking priority to local residents and short-stay shop and business visitors.

The DRLLP PSV 2020 applies Draft London Plan policy T6 to promote a reduction in car ownership and private car trips. In PTAL areas 1 and 2, the plan proposes to introduce lower Lambeth specific maximum car parking standards.

- Both parties **agree** to consult with each other about proposed changes to parking controls where these may have a cross-border impact.
- Lambeth notes that there is a CPZ coming forward in Dulwich. Both parties **agree** to strategically consider traffic, parking and transport issues in Dulwich and the wider area.
- Both parties **agree** to work collaboratively to explore ways to deliver the workspace levy parking concept at sub regional level.

#### *Other transport and infrastructure agreements:*

- Both parties **agree** to strategically consider traffic, parking and transport issues related to the reconfiguration of King's College Hospital and South London and Maudsley. Lambeth notes that Southwark is currently undertaking a transport study and encourages the study to consider such impacts on Lambeth.
- Both parties **agree** to ensure a co-ordinated approach, with TfL, to bus corridors and bus priority measures.
- Both parties **agree** to work collaboratively to improve east-west bus services.
- Both parties **agree** to promote and support the development and implementation of improvements to local rail services as part of the Mayor's 'metroisation' plan.
- Both parties **agree** to work collaboratively to consider the impacts that re-opening Camberwell station could have on Loughborough Junction and the wider South London rail network, taking into account 'metroisation'.
- Both parties **agree** to ensure a coordinated approach to traffic management at Upper Ground spine route.
- Both parties **agree** to work collaboratively around the implementation of schemes impacting Herne Hill and the wider management of transport issues in Herne Hill.
- Both parties **agree** to work collaboratively to deliver the Draft London Plan approach to freight consolidation.

#### 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.

Poor air quality is also a major concern for Southwark's residents and is considered a strategic matter which cannot be resolved by local policy alone.

- Both parties **agree** to continue their involvement in a number of cross-organisational projects and organisations to tackle poor air quality across London (see appendix 1).

The impacts of construction traffic, including to air quality, can cross borough boundaries. This is the case in the north of the borough where the London Bridge, Borough and Bankside Opportunity Area logistics group facilitates bi-monthly coordination with all contractors in the opportunity area as well as business improvement districts, Lambeth council and TfL.

- Both parties **agree** that air quality is a trans-boundary strategic issue, which will require cooperation to tackle.
- Both parties **agree** to work collaboratively to ensure that the impacts of construction are mitigated.

#### 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. Lambeth is planning for net self-sufficiency by safeguarding existing waste sites and identifying sufficient land to provide opportunities to meet the waste management capacity gaps for the borough.

Southwark is a member of the London Waste Planning Forum, and is entered into a voluntary partnership with Bexley, Bromley, Greenwich, and Lewisham called the Southeast London Joint Waste Planning Group (SELJWPG). In order to demonstrate effective collaboration, the SELJWG produces the South East London Waste Technical Paper. This report sets out general planning policy for waste, each borough's waste strategy and local planning policies and shows the sites which contribute to the waste management capacity requirement. It is reviewed by the group as individual boroughs prepare their Local Plan, allowing the capacity of sites to be kept up to date. Each borough must allocate its strategic waste sites formally in a DPD to safeguard them for the life of their Local Plan - in the event that a site is required for another use, the capacity must be re-provided, in accordance with London Plan policy. The NSP safeguards the Integrated Waste Management Facility site in line with the paper.

The London Borough of Southwark receives strategic amounts of waste exports from Lambeth as set out in the Lambeth Waste Evidence Base 2019. No significant waste exports from Southwark are received in Lambeth.

- Both parties **agree** to plan separately to meet their respective Local Plan waste apportionments following the approach described above.
- Both parties **agree** there are no known planning reasons why exports of similar amounts of waste exports cannot continue.

#### 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 Plan policies. SFRAs assess the risk from all sources of flooding, this includes fluvial, tidal, surface water and foul water sources.

Each council 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 Southwark'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.

Lambeth's Local Plan flood risk related policies state that all new development must avoid increasing the risk of flooding; and where possible, positively contribute to the reduction in risk to the borough and elsewhere (Policy EN5). It encourages the use of Sustainable Drainage Systems to achieve this (Policy EN6) due to their ability to mimic natural drainage while providing water quality, biodiversity and amenity benefits. The Lambeth Local Plan also requires developments to satisfy; the London Plan's Sustainable Drainage Policy (Policy SI13) in particular the London Plan Drainage Hierarchy; and, the national Non-statutory Technical Standards for Sustainable Drainage Systems.

Southwark plans to mitigate surface flooding risk by mimicking natural drainage patterns by reducing hard surfaces and increasing absorbent surfaces through soil and planting. Policy P70 in the NSP states that development must not increase flood risk on- or off-site, by ensuring that major developments reduces surface water run-off to green field run-off rates. This must be through the application of water sensitive urban design and Sustainable Urban Drainage Systems (SUDS).

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

Southwark and Lambeth are hydraulically connected through shared watersheds which impact on each borough's risk of flooding from surface water. The risk of flooding from surface water is assessed in respective Surface Water Management Plans, where areas at significant risk of flooding are identified and are labelled as Critical Drainage Areas (CDAs). There are 10 CDAs within Lambeth, of which two are shared with Southwark (Group7\_031 and Group7\_032).

- Both parties **agree** to work collaboratively to reduce the risk of flooding within Critical Drainage Areas.

#### 4.13 Provision of energy (including heat)

Lambeth proposes to follow the Draft London Plan policy approach to the provision of energy in relation to new development (see Draft Revised Lambeth Local Plan policy EN3).

The South East London Combined Heat and Power plant currently heats 2,500 homes within the borough. There are plans to expand this network to provide heating to more homes. Southwark also proposed to Draft London Plan policy approach to the provision of energy in relation to new development (see New Southwark Plan Submission Version policy P69: Energy).

- Both parties **agree** to work collaboratively where opportunities arise to connect development to heat networks that cross, or are in close proximity to, the borough boundary between the two parties.

#### 4.14 Green infrastructure (i.e SINC and MOL)

- Both parties **agree** to consult each other on any proposals that could impact on green infrastructure in the neighbouring borough.
- Both parties **agree** to have regard to each other's SINC and MOL designations on or in close proximity to the borough boundary and their respective Local Plan policies when determining applications.

#### 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.

In April 2019 Southwark Council joined the international Climate Change Campaign and declared a Climate Change Emergency. Southwark is a low-lying borough next to the tidal Thames, and so is particularly vulnerable to the impact of the rising sea levels and flooding. Southwark have cut emissions by 37% since 2010 and are hoping to achieve carbon neutrality by 2030. An Integrated Impact Assessment is currently being produced for Southwark which will become part of the New Southwark Plan.

The sections above relating to transport, waste, flood risk, provision of energy, green infrastructure 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 Southwark and Lambeth 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 consult each other on any proposals on/in the River Thames and have regard to each other's respective Local Plan policies.
- 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 SINCS.

- 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.

#### 4.17 Strategic and local views, and heritage, design and conservation

##### *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.

Southwark lists a range of criteria in policy to determine higher building applications instead of identifying specific zones. These criteria can be found in the NSP under P15. Protected views within the borough and across boundaries are also covered under NSP P20.

- Both parties **agree** to consult each other on any proposals that could impact on strategic and/or local views and to work together to ensure that in the case of strategic views such development will protect and enhance these views in line with the guidance in the LVMF, and in the case of all other views that development will optimise opportunities to protect and enhance in line with relevant local policy and guidance.

##### *Heritage, design and conservation*

- Both parties **agree** to have regard to the setting of heritage, design and conservation designations adjoining the borough boundary in the neighbouring borough when determining applications, and consult each other on any proposals that could impact on these designations.

#### 4.18 Cultural infrastructure

Lambeth has developed a cultural evidence base (*Visitor attractions, leisure, arts and cultural uses in Lambeth 2019*) which sets out existing cultural uses in the borough. This has been used to inform DRLLP policy ED13 which seeks to follow the Draft London Plan approach to protecting and enhancing cultural infrastructure (see DLP policy HC5).

Southwark published a Cultural Strategy in 2017 which sets out existing cultural uses in the borough and sets out own ambitions for the ongoing growth of cultural facilities within the borough. This has informed Policy P44 within the draft New Southwark Plan.

##### Southbank

##### *Strategic clusters of cultural attractions*

The Mayor has identified a number of areas of London which are rich in cultural heritage. One of the strategic clusters of cultural attractions, South Bank/Bankside/London Bridge, crosses the borough boundary between the two parties. Southbank contains one of London's most significant agglomerations of cultural activities.



- Both parties **agree** to work collaboratively to deliver the Draft London Plan and Local Plan policy approaches in the South Bank/Bankside/London Bridge cultural cluster.
- Both parties **agree** to consult each other on any proposals that could impact on this cluster in the neighbouring borough.
- Both parties acknowledge that this area is likely to result in cross border movements of people between each borough 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 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	Proposed plan review start date	Reg 18 date	Reg 19 date	Submission date
Lambeth	September 2015	October 2017	October 2018	January 2020	April 2020
Southwark	2011	-	-	-	December 2019

*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 signatories agree that this statement is an accurate representation of areas of agreement and disagreement between the two parties.

Signed: 

Name: Councillor Matthew Bennett

Position: Cabinet Member for Planning,  
Investment & New Homes

***London Borough of Lambeth***

Date: 08/01/2020

Signed: 

Name: Simon Bevan

Position: Director of Planning

***London Borough of Southwark***

Date: 4 December 2019

## Appendix 1 - Schedule of engagement between the parties

Schedule of meetings between Southwark and Lambeth:

Organisation	Dates
<b>Southwark, Lambeth and City of London</b> Officer level duty to cooperate meetings	2015 – 15 September 2017 – 15 September
<b>Southwark and Lambeth</b> Officer level duty to cooperate meetings	2016 – 21 January 2017 – 22 July 2018 – 25 June 2019 – 18 October (meeting to discuss strategic cross border planning matters under the duty to co-operate and to develop this statement of common ground took place)
<b>Cross-River Partnership</b> includes the central London boroughs along with business groups and other key stakeholders such as Network Rail, Groundwork London, London & Partners, Transport for London and the GLA. Its key focus is on economic growth, sustainable employment, carbon reduction and place-making.	Twice yearly board meetings
<b>Association of London Borough Planning Officers</b>	2013 – 30 April, 25 June, 10 September 2014 – 14 January, 4 March, 24 June, 9 September 2015 – 3 February, 31 March, 19 May, 29 September, 24 November 2016 – 21 January, 21 June, 27 July, 13 October 2017 – 14 March, 22 March, 16 May, 7 September, 7 December 2018 – 16 February, 1 May, 3 July, 18 September, 13 November 2019 – 25 January, 7 February, 12 March, 4 April (sub group meeting), 7 May, 5 June (sub group meeting), 16 July, 25 July, 17 September, 19 September (sub group meeting), 12 <sup>th</sup> November
<b>London Councils</b> London Councils represents London's 32 boroughs and the City of London. It is a cross-party organisation that works on behalf of all of its member authorities regardless of political persuasion. The strategic direction of London Councils is set by the Leaders' Committee. Our Leaders' Committee comprises the Leaders of all of	2013 – 12 February, 12 March, 14 May, 11 June, 9 July, 8 October, 12 November, 10 December 2014 – 11 February, 11 March, 9 April, 15 July, 14 October, 9 December 2015 – 10 February, 24 March, 2 June, 14 July, 13 October, 8 December 2016 – 9 February, 22 March, 7 June, 12 July, 16 October, 6 December 2017 – 7 February, 21 March, 11 July, 10 October, 5 December

London's local authorities. There is also a cross-party Executive, which guides the organisation's day-to-day work. The London Fire and Emergency Planning Authority and the Mayor's Office for Policing and Crime are also in membership.	
<b>London Borough Development Viability Group</b>	Every three months
<b>Our Health South East London</b> OHSEL is a proposal devised by the 6 Clinical Commissioning Groups (CCGs) covering the London Boroughs of Bexley, Bromley, Greenwich, Lambeth, Lewisham and Southwark.	2016 – 1 February, 26 April, 17 May, 11 October 2017 – 26 July, 13 December 2018 – 12 March, 26 September 2019 – 21 March, 22 July

Air quality meetings:

Project	Partner
<b>Schools Air Quality Audit Fund</b>	GLA
<b>Nurseries Air Quality Audit Fund</b>	GLA
<b>School Streets Campaign</b>	Living Streets (Lead)
<b>London Councils work into new AQ legislation</b>	London Councils (lead), various other boroughs
<b>Healthy Streets Everyday</b>	Islington (lead), Cross River Partnership, 15 other boroughs, GLA (funders) – TBC
<b>Clean Air Villages</b>	Lewisham (lead), Cross River Partnership, Camden, H&F, RBKC, Wandsworth, Defra (funders)
<b>Non Road Mobile Machinery register</b>	King's College London, GLA, TFL, Brent, Camden, City of London, Croydon, Hammersmith and Fulham, RBKC, Islington, Lewisham, Tower Hamlets, Wandsworth, and Westminster.
<b>Air Quality Monitoring Network</b>	King's College London
<b>Breathe London Project</b>	GLA (lead), University of Cambridge, King's College London, AirMonitors, CERC, Environmental Defense Fund, Google Earth Outreach, National Physical Laboratory, C40 Cities.
<b>airTEXT service</b>	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
<b>STARS programme</b>	TfL
<b>Pollution alerts to schools, GP surgeries and care homes</b>	GLA, King's College London
<b>Ultra Low Emission Zone</b>	GLA
<b>Electric Vehicle Car Clubs project</b>	GLA (funders), TfL

**Statutory duties as Air Quality Management Area**

GLA, Defra

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

Flood officer meetings:

Southwark's and Lambeth'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.

Cross-River Partnership meetings:

Cross-River Partnership include the central London boroughs along with business groups and other key stakeholders such as Network Rail, Groundwork London, London & Partners, Transport for London and the GLA. Its key focus is on economic growth, sustainable employment, carbon reduction and place-making. Board meetings take place twice annually.

South Bank and Bankside Cultural Quarter:

The South Bank and Bankside Cultural Quarter (SBBCQ) is a partnership consisting of 30 cultural organisations, local authorities including Lambeth and Southwark, business improvement districts and universities. The partnership is director-led and meets approximately three times a year.

South Bank Partnership:

South Bank Partnership brings together the area's two MPs, major employers and business representatives, the Greater London Authority, the Metropolitan Police, Network Rail, Transport for London, representatives from the local community sector, and elected representatives and officers from Lambeth Council and Southwark Council. The Partnership released Manifestos in 2014 and 2018, which set out the priorities for the area.

LB Southwark

Southwark Council engages with other boroughs and the City of London through regular meetings either between officers or elected members with formalised governance arrangements such as the London Councils Leaders' Committee, Association of London Borough Planning Officers, the Cross River Partnership, and the South East London Duty to Cooperate Group. Southwark also maintain

correspondence between planning departments on a variety of issues and projects and organise additional meetings on strategic planning matters when needed.

## **Appendix 2 - Evidence of activities undertaken to address an issue**

Local plan consultations:

On 9<sup>th</sup> October 2017, Lambeth notified Southwark 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 Southwark to make representations. Southwark did not submit a response to this consultation.

On 22<sup>nd</sup> October 2018, Lambeth notified Southwark 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 Southwark to make representations. Southwark did not submit a response to this consultation.

On 14 December 2017, Southwark notified Lambeth that informal consultation on the New Southwark Plan Proposed Submission Version would run until 24 December 2017, with formal consultation running for six weeks from 2 January 2018 to 12 February 2018.

On 25 January 2019, Southwark notified Lambeth that consultation on the New Southwark Plan Amended Policies Version would run from 25 January 2019 until 17 May 2019.

### Schedule of representations received from Southwark in the DRLLP regulation 18 consultation

None.

### Schedule of representations received from Lambeth in the New Southwark Plan Proposed Submission Version consultation on 15th December 2017

Representation Wording	Southwark Officer Response	Proposed Change in NSP PSV 2019
<p>We note that a number of the site allocations in around Camberwell and Dulwich allow for the provision of new extra care homes. Has the need for this specialist accommodation, in this location, been discussed with the Lambeth clinical commission group, in the context of the emerging market position statement for adult social care in the two boroughs?</p> <p><i>There is still no mention of the clinical commissioning group (CCG). This point has not been addressed</i></p>	<p>Extra care homes requirements have been removed from the site allocations due to proposals for housing of this type to be considered under the 'Housing for older people' policy. Any identified need will be addressed in the Southwark Housing Strategy.</p>	<p>None.</p>
<p>The ambitions that both Councils have for Blackfriars and Waterloo (to see these become thriving business districts) can be mutually complimentary and beneficial.</p> <p><i>This isn't stated – the collaborative ambition for this location should be reflected in the document.</i></p>	<p>This ambition is already stated within the Blackfriars Road Area Vision.</p>	<p>None.</p>
<p>Unprecedented growth is already underway, in both Blackfriars and Waterloo, and <u>moreover TfL and LBL are pursuing the redevelopment of the roundabout</u>. All of this growth will bring pressures; on the public realm, open space and transport links. Many of the workers and new residents of the Blackfriars Road developments will use Waterloo Station and the routes connecting Waterloo and Blackfriars Road, notably the Cut and Stamford Street. Both these streets suffer increasingly from congestion and are in need of significant investment. <u>TfL and Lambeth taking forward plans for the redevelopment of the high road</u>.</p> <p>Waterloo has recently experienced significant growth in hotel developments, and Lambeth will be testing the implications of this growth through the forthcoming Local Plan review. We will be exploring what the impact of further hotel development would be on the sustainability of Waterloo and the surrounding areas. We note that a number of the site allocations in this area propose new visitor accommodation. The impact of this use on the wider</p>	<p>The reasons to our hotels policy notes that we have delivered one of the highest numbers of hotel rooms in London. References to new visitor accommodation were removed from site allocations in the plan with the exception of key strategic development sites in the Canada Water and Old Kent Road opportunity areas. This was due to ensuring the site allocations set out a concise list of required uses including housing and offices and where other uses are proposed this would be assessed against normal development management policies and in the context of meeting the requirements of the site allocation.</p>	

<p>locale including in Lambeth needs to be tested. For the site allocations that include proposals for visitor accommodation, please can this potential impact be acknowledged.</p> <p>The PSV does not acknowledge any potential impacts that further hotel developments may have on the mix and balance of uses in the wider Waterloo area including on the Lambeth side. It only states:  <i>Development for hotels and other forms of visitor accommodation must not harm the local character or amenity by the design, scale, function, parking and servicing arrangements</i></p>		
<p>The Waterloo area has traditionally lacked much permeability and we welcome all commitments to enhance connectivity, especially for pedestrians and cyclists, and are pleased to see commitments to furthering the 'low line'.</p>	<p>Indicative Low Line routes are planned to extend into Lambeth in the Waterloo area.</p>	<p>NSP P51 sets out details regarding the expansion of Low Line routes.</p>
<p>Lambeth is committed to safeguarding The Cut and Lower Marsh as a retail Centre and welcomes all moves which contribute to its vitality. Conversely we would be concern about any proposals that detract from the vitality and viability of the Lower Marsh / The CUT CAZ frontage.</p>	<p>Noted. Our policies also safeguard The Cut as a CAZ frontage and seek to safeguard 40% A1 uses to support the vitality and viability of these frontages.</p>	<p>None.</p>
<p>In addition we are conscious of the urgency to coordinate efforts around managing the impact of construction during this period of development, and in particular to mitigate against air pollution.  <i>Policy P66 on Improving air quality policy does not mention mitigating impacts during the construction process</i></p>	<p>We require detailed construction management plans for development to mitigate adverse impacts and the construction phase of development is included in our highways impacts policy, reducing waste policy, hazardous substances policy and now specifically mentioned in the reasons to the air quality policy.</p>	<p>Policies updated to include references to mitigation during construction phase.</p>
<p><b>Blackfriars Road</b></p> <p><u>NSP14 Telephone Exchange and 50 – 60 Blackfriars Road</u>  This site lies immediately adjacent to the Lambeth borough boundary alongside its western flank on Hatfields. It is in reasonable proximity to the Lower Marsh / The Cut CAZ Boundary and Waterloo Opportunity area,</p>	<p>This site allocation has been removed from the NSP.</p> <p>This is because the site owners confirmed there is no prospect of redevelopment within the NSP</p>	<p>None.</p>



<p>therefore the site will need to acknowledge any potential implications this may have. In turn NSP14 lies just to the East of Lambeth Local Plan Site 7 (Waterloo Station/Waterloo Road SE1).</p> <p>There needs to be recognition in the supporting text of this site's position on the borough boundary. On the Lambeth side the Waterloo CA adjoins and the Roupell Street CA is very close. There are significant implications for these designated heritage assets with tall buildings at this end of the site.</p> <p><i>We welcome the commitment to the provision of improved public realm and increased links.</i></p>	<p>timeframe as the site houses telecoms equipment that cannot be relocated.</p>	
<p><u>NSP16 Land enclosed by Colombo Street, Meymott Street and Blackfriars Road</u></p> <p>The site is lies adjacent to the borough boundary. It is also in close proximity to the Waterloo OA, and lies to the east of Lambeth Local Plan Site 7 (Waterloo Station/Waterloo Road SE1).</p> <p>There are potential concerns about allowing visitor accommodation in this location given the significant concentration of hotels that exist in Waterloo.</p>	<p>We have acknowledged the site's proximity to the borough boundary with Lambeth.</p> <p>The reasons to our hotels policy notes that we have delivered one of the highest numbers of hotel rooms in London. References to new visitor accommodation were removed from site allocations in the plan with the exception of key strategic development sites in the Canada Water and Old Kent Road opportunity areas. This was due to ensuring the site allocations set out a concise list of required uses including housing and offices and where other uses are proposed this would be assessed against normal development management policies and in the context of meeting the requirements of the site allocation.</p>	<p>We have stated that: 'Development proposals must recognise the site's close proximity to the borough boundary and must consider the setting of heritage assets in Lambeth, in addition to any cross-boundary issues and the provisions of policies and site allocations within reasonable proximity of the site as set out in the Lambeth Local Plan.'</p> <p>We have stated that: 'Southwark needs to accommodate significant growth for offices and other workspaces which are growing in demand contributing to the central London economy and status as a world city.'</p>

<p><u>NSP18: Southwark Station and 1 Joan Street</u></p> <p>The site is lies adjacent to the borough boundary and Waterloo OA. NSP18 is also in close proximity Lower Marsh / The Cut CAZ Boundary, just to the East of Lambeth Local Plan Site 7 (Waterloo Station/Waterloo Road SE1).</p> <p>We welcome the development of an enhanced station, but wish to understand further what provisions are to be made to for temporary access/egress during redevelopment, and what long term intentions TfL/Network Rail have to improve access to Waterloo East.</p> <p>We welcome to the commitment to town centre frontages along The Cut, which will contribute to its vitality.</p> <p>There are potential concerns about allowing visitor accommodation in this location given the significant concentration of hotels that exist in Waterloo.</p>	<p>The site allocation requires that redevelopment of the site must maintain and improve access and egress from Southwark Station and Waterloo East station. Temporary access requirements would be part of the detailed site design with TFL.</p> <p>The reasons to our hotels policy notes that we have delivered one of the highest numbers of hotel rooms in London. References to new visitor accommodation were removed from site allocations in the plan with the exception of key strategic development sites in the Canada Water and Old Kent Road opportunity areas. This was due to ensuring the site allocations set out a concise list of required uses including housing and offices and where other uses are proposed this would be assessed against normal development management policies and in the context of meeting the requirements of the site allocation.</p>	<p>We have stated that: ‘Development proposals must recognise the site’s close proximity to the borough boundary and must consider the setting of heritage assets in Lambeth, in addition to any cross-boundary issues and the provisions of policies and site allocations within reasonable proximity of the site as set out in the Lambeth Local Plan.’</p> <p>We have stated that: ‘Southwark needs to accommodate significant growth for offices and other workspaces which are growing in demand contributing to the central London economy and status as a world city.’</p>
<p><u>NSP20 Land between Paris Gardens, Colombo Street, etc.</u></p> <p>NSP21 is adjacent to the borough boundary and Waterloo OA. It is in reasonable proximity to Lambeth Local Plan Site 7 (Waterloo Station/Waterloo Road SE1) and Site 9 (ITV Centre and Gabriel’s Wharf).</p> <p>There needs to be recognition in the supporting text of this site’s proximity on the borough boundary and the implications this has for the setting of heritage assets in Lambeth.</p> <p>There are potential concerns about allowing visitor accommodation in this location given the significant concentration of hotels that exist in Waterloo.</p>	<p>We have acknowledged the site’s proximity to the borough boundary with Lambeth.</p> <p>We encourage the provision of office and other workspace in the area with the desire of increasing the amount of employment floorspace.</p>	<p>We have stated that: ‘Development proposals must recognise the site’s close proximity to the borough boundary and must consider the setting of heritage assets in Lambeth, in addition to any cross-boundary issues and the provisions of policies and site allocations within reasonable proximity of the site as set out in the Lambeth Local Plan.’</p>

		We have stated that: 'Southwark needs to accommodate significant growth for offices and other workspaces which are growing in demand contributing to the central London economy and status as a world city.'
<p><u>NSP21 – 1 – 5 Paris Gardens and 16 – 19 Hatfields</u></p> <p>NSP21 lies immediately adjacent to the borough boundary and Waterloo OA. It is also in close proximity to Lambeth Local plan Site 7 (Waterloo Station/Waterloo Road SE1) and reasonable proximity to Site 9 (ITV Centre and Gabriel's Wharf).</p> <p>There needs to be recognition in the supporting text of this site's proximity on the borough boundary and the implications this has for the setting of heritage assets in Lambeth.</p> <p>We welcome the commitment to providing an East-West link through the site. We note the additional pressure the uplift in residential numbers will bring on Hatfields Gardens currently managed by the BOST open space trust.</p> <p>There are potential concerns about allowing visitor accommodation in this location given the significant concentration of hotels that exist in Waterloo.</p> <p><i>Lambeth understand that Southwark have approved an office scheme on the Paris Gardens site so the comments about pressure from increased residential are not so pressing.</i></p>	<p>We have acknowledged the site's proximity to the borough boundary with Lambeth.</p> <p>We encourage the provision of office and other workspace in the area with the desire of increasing the amount of employment floorspace</p>	<p>We have stated that: 'Development proposals must recognise the site's close proximity to the borough boundary and must consider the setting of heritage assets in Lambeth, in addition to any cross-boundary issues and the provisions of policies and site allocations within reasonable proximity of the site as set out in the Lambeth Local Plan.'</p>
<p><u>NSP22 - Camberwell Station</u></p> <p>This site lies immediately to the west of the borough boundary and Camberwell Trading Estate KIBA.</p>	<p>We have revised the site design and accessibility guidance to state that the access from the west</p>	<p>The site design and accessibility guidance now</p>

<p><i>Please include the same paragraph about cross border issues that has been included in site allocation 26.</i></p> <p>The proposed new station at Camberwell promotes improved connectivity and we think an entrance into Lambeth but it would be coming out into the middle of a residential street, so may have some adverse impact. Please could the site allocation acknowledge this and seek mitigated as required.</p> <p><i>PSV states:</i>  <i>Any new station must have direct access from both Camberwell Station Road and McDowall Road to ensure the station is accessible to all.</i></p> <p><i>New Lambeth Comment - Southwark do not seem to have addressed the need to mitigate the impact on residential amenity of creating a station entrance in the middle of a residential street.</i></p>	<p>would likely be in the vicinity of the wider Knatchbull Road/ McDowall Road area.</p> <p>Specific access requirements would be reviewed in a detailed scheme design.</p>	<p>reflects the access to the new proposed station.</p>
<p><u>NSP 26: Camberwell Bus Garage</u></p> <p>And</p> <p><u>NSP27: Abellio Bus Garage, Camberwell</u></p> <p>These sites lie in reasonable proximity to (the west of) the Camberwell Trading Estate KIBA.</p> <p>If the bus stations are considered to be surplus to requirements, please could any potential impacts on any service provision in Lambeth be acknowledged and mitigated as required.</p> <p><i>Please include the same paragraph about cross border issues that has been included in site allocation 26 for 27</i></p>	<p>The site design and accessibility guidance has been updated to reflect its proximity to the borough boundary.</p> <p>The guidance states that if the bus garage is deemed surplus to requirements any potential impacts on the bus network must be mitigated.</p> <p>We have stated: ‘Development proposals must recognise the site’s close proximity to the borough boundary and must consider the function of Camberwell Trading Estate, in addition to any cross-boundary issues and the provisions of policies and site allocations within reasonable proximity of the site as set out in the Lambeth Local Plan.’</p>	<p>None.</p>

<p><b>Dulwich (126)</b></p> <p><u>NSP35 Guys and St Thomas Trust Rehabilitation Centre, Crystal Palace.</u></p> <p>This site lies just to the north of the borough boundary and Crystal Palace District Centre.</p> <p>Site vision should acknowledge the site location on the borough boundary with Lambeth and Bromley.</p>	<p>The site design and accessibility guidance already reflects the site's proximity to the borough boundary.</p> <p>We have stated: 'The site is located adjacent to the intersection of the three borough boundaries of Southwark, Lambeth and Bromley. Accordingly, development proposals must consider any cross-boundary issues as well as the provisions of policies and site allocations within reasonable proximity to the site as set out in the Lambeth Local Plan and the Draft Bromley Local Plan.'</p>	<p>None.</p>
<p><b>Herne Hill and North Dulwich</b></p> <p><u>NSP50 Bath Trading Estate</u></p> <p>The site lies immediately to the south of the Herne Hill District centre.</p> <p>Site vision needs to acknowledge that the site sits on the borough boundary and that development should preserve or enhance the setting of Brockwell Park (a Registered Landscape and Conservation Area).</p> <p>Lambeth is currently preparing a draft Conservation Area Statement for Brockwell park CA. It includes suggested extensions to the conservation area including at Dulwich Road and Railton Road. The draft document also acknowledges the importance of the Bath Road Trading Estate:</p> <p>The current parade of shops is generally is low, uniform and unobtrusive in form. This means that in views from the historic landscape it has a positive role in allowing views of open sky and distant tree canopies.</p> <p>Development on top of the shops as proposed will harm important views into the historic landscape from trains on the railway viaducts immediately</p>	<p>The site design and accessibility guidance reflects its proximity to the borough boundary and the Brockwell Park Registered Landscape and Conservation Area.</p> <p>The site guidance is clear that development must consider the setting of heritage assets in Lambeth, in addition to the provisions of policies and site allocations within reasonable proximity as set out in the Lambeth Local Plan.</p> <p>The site allocation would allow for comprehensive redevelopment of the site however this must be sensitive to the two adjacent conservation areas and this is reflected in the updated site guidance. It also acknowledges the railway viaduct as a locally listed asset in Lambeth. The site opportunities include intensifying employment uses, providing residential development on upper floors of the shops (sensitive to the settings of the conservation</p>	<p>Site guidance restructured and references the two conservation areas and locally listed in Lambeth railway viaduct.</p>

<p>adjoining the site allocation. These are the only elevated location from which to appreciate the English Landscape.</p> <p>If piecemeal ad-hoc development were to be allowed on this parade there is a substantial risk of harm to these designated heritage assets.</p> <p>In light of the important contribution the low, uniform height of this shopping parade makes to the special interest of the Brockwell Park Conservation Area we ask that the site allocation is dropped and that the parade and adjoining viaduct are designated as a conservation area by Southwark. There is a precedent for such an approach on Herne Hill where Lambeth designated the Herne Hill Conservation Area partially in response to the contribution Lambeth buildings made to the Stradella Conservation Area.</p> <p>The ornate cast iron railway bridge to the immediate south staddles the borough boundary. Lambeth's half (RHS) is locally listed. We ask that consideration be given to similar recognition be given to Southark's half (LHS) and consideration be given to its inclusion within the conservation area designation we recommend above. Similarly we would ask that the Southwark half of the railway bridge spanning Herne Hill is also designated.</p> <p><i>NSP50 is does not fully address our point. Given the sensitivities of the site we consider comprehensive redevelopment (as opposed to a piecemeal) is necessary to ensure that all the public benefits brought by redevelopment to the locality are optimised.</i></p>	<p>areas) and provide better linkages as part of the town centre to Half Moon Lane.</p> <p>The inclusion of the site allocation discourages ad hoc development due to securing an overall aspiration for the site's future development and design guidance in the context of important heritage settings. Therefore it is appropriate to remain a site allocation.</p>	
<p>APPENDIX 1</p> <p>This should consider including the views of adjoining boroughs where they cross Southwark. See schedule in Lambeth Local Plan Policy Q26. We can provide view cone data.</p> <p><i>Annex 4 states that Southwark will continue to work closely with City of London, London Borough of Tower Hamlets and HE to ensure that</i></p>	<p>This will be updated in a map in our Annex on Borough views.</p>	<p>This will be updated in a map in our Annex on Borough views.</p>

*development that may impact upon the significance or our Borough Views is appropriate and have regard to the purpose and scope of our views designations.*

*This does not appear to have considered Lambeth views*