

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

December 2019

1. Executive Summary

This Statement of Common Ground has been prepared to demonstrate that Lambeth's Draft Revised Lambeth Local Plan – Proposed Submission Version January 2020 (DRLLP PSV 2020) is '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 Wandsworth 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' 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 Wandsworth

The existing statutory development plan for the Wandsworth consists of the following:

- The Core Strategy, adopted March 2016
- The Development Management Policies Document (DMPD), adopted March 2016
- The Site Specific Allocations Document (SSAD), adopted March 2016
- The Policies Map, adopted March 2016
- The London Plan (consolidated with alterations since 2011), adopted March 2016
- The Local Plan Employment and Industry Document, adopted December 2018 (which replaces employment and industrial land policies, area spatial strategies and site allocations in the existing Local Plan documents).

The main proposed additional / forthcoming plan is the new Local Plan Full Review, which together with the Policies Map, will, upon its adoption, supersede all the Borough's existing Local Plan documents. Wandsworth is currently working towards the second stage issues consultation of the new Wandsworth Local Plan.

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

¹ Also known as the London Economic Action Partnership

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 policies in the boroughs' local plans (DRLLP policy EN4 and Wandsworth Local Plan 2016: Core Strategy Policy IS6 and DMPD Policy DMS3), 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.

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 and 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.

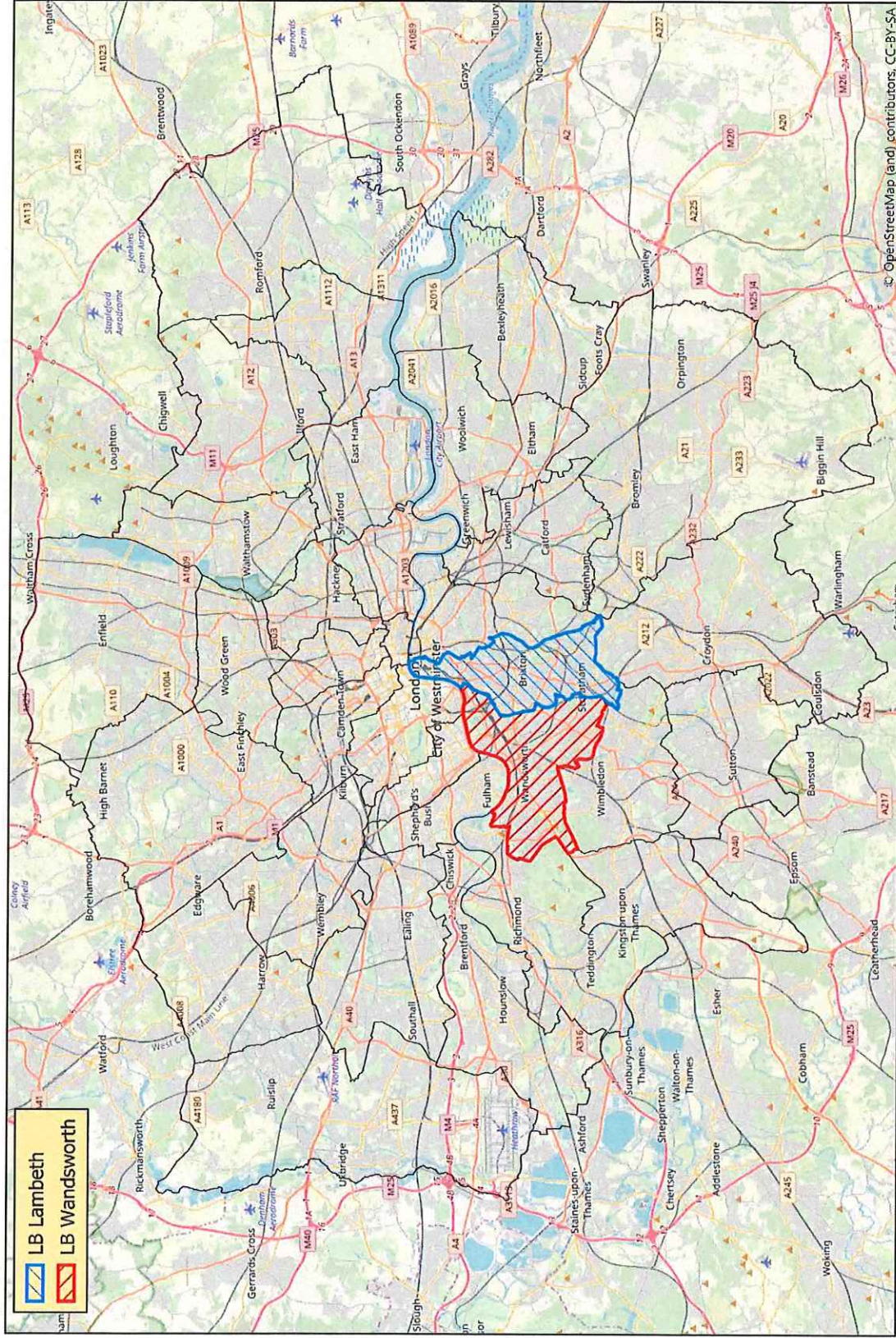
LB Wandsworth

Wandsworth is an inner London borough with a northern boundary on the River Thames. It bounds Lambeth to the west and is also bound by LB Merton (to the south) and RB Kingston (to the south west) and Richmond (to the west).

This Statement includes the whole of the LB Lambeth and the whole of LB Wandsworth. The border between the two boroughs covers approximately 10 kilometres. LB Lambeth and LB Wandsworth are not jointly part of any formal sub-regional groupings and therefore both parties have decided to enter a bilateral statement of common ground (SCG).

An agreement exists that provides one council or the other with the maintenance responsibility for each boundary street.

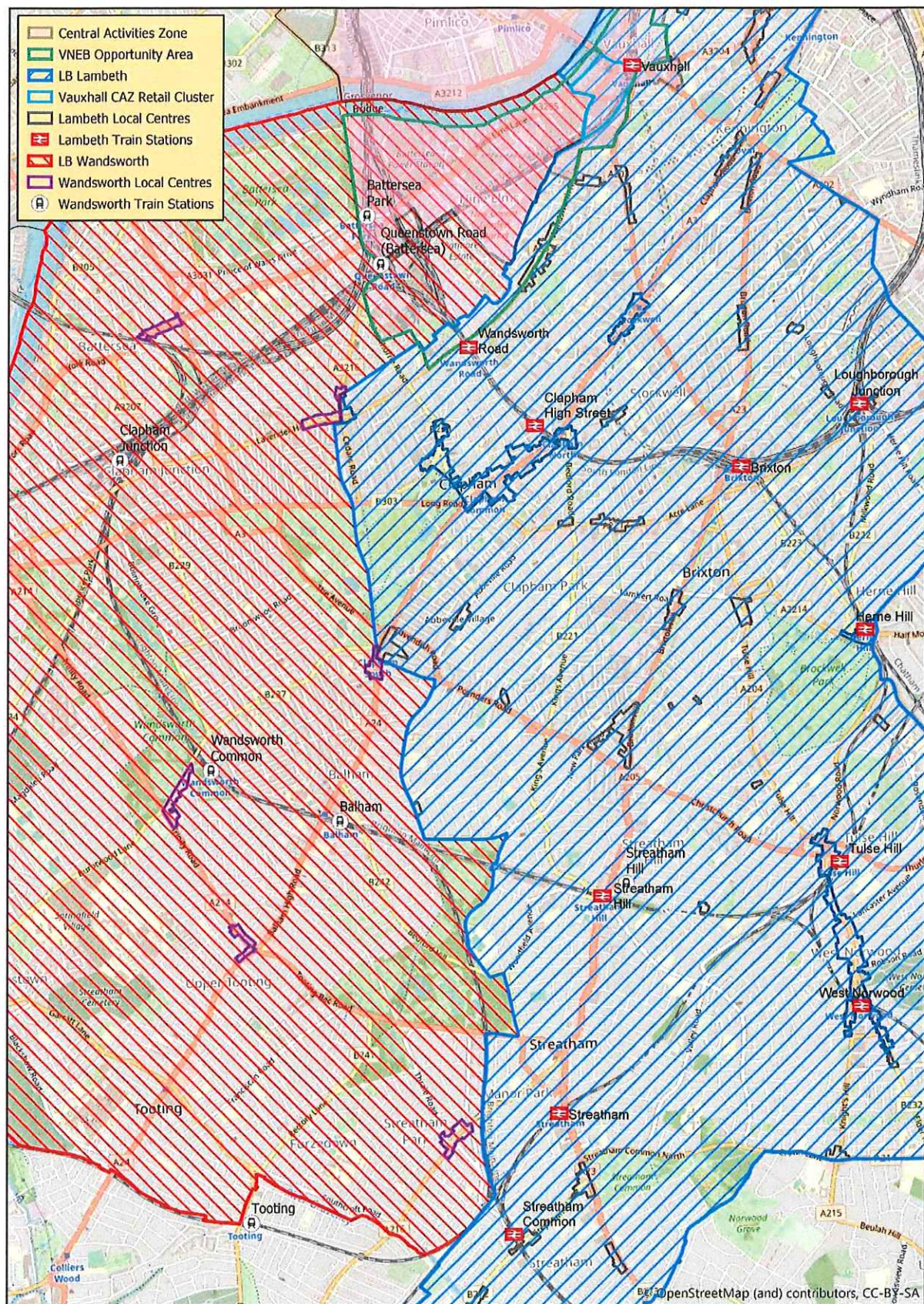
Map 1 – Map of parties involved in this Statement



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



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Neighbourhood planning

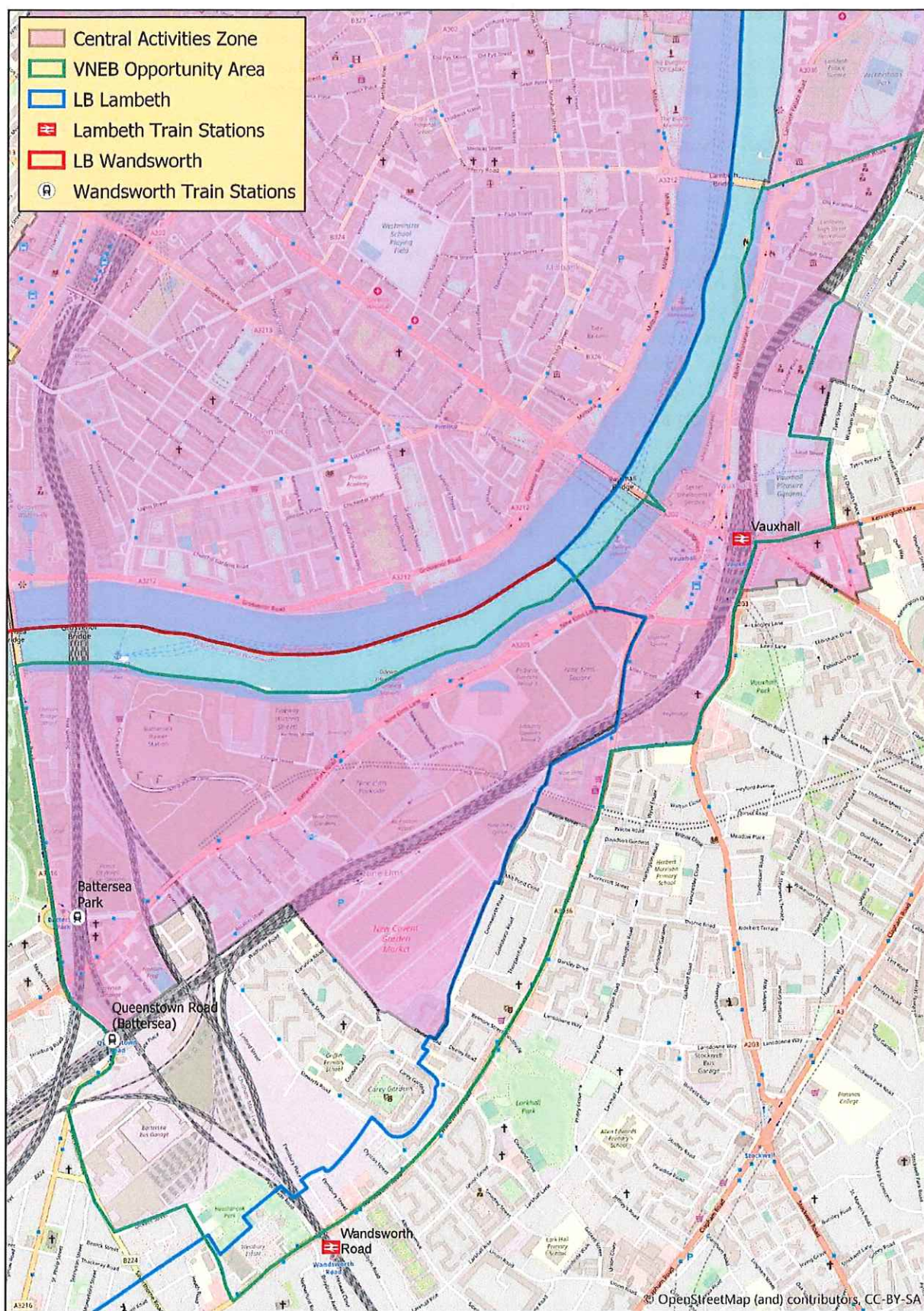
There are no designated neighbourhood planning areas in Lambeth spanning the borough boundary or close to the borough boundary with Wandsworth, however the designated [Tooting Bec and Broadway Neighbourhood Area](#) lies directly on the boundary with LB Lambeth and includes two Lambeth owned cemeteries (Streatham Cemetery and Lambeth Cemetery).

Employment, retail, leisure and other commercial development

Vauxhall, Nine Elms and Battersea Opportunity Area

Vauxhall, Nine Elms and Battersea Opportunity Area - The Draft London Plan identifies areas that will see the most significant change. These are known as Opportunity Areas (OAs). Many OAs are already seeing significant development and have the potential to deliver a substantial amount of the new homes and jobs. The Vauxhall, Nine Elms and Battersea Opportunity Area (VNEB OA) crosses the border between the two parties. The Draft London Plan states that the VNEB OA has the potential to deliver greater levels of housing alongside employment than the other CAZ Opportunity Areas. In these areas, offices and other CAZ strategic functions may be given equal weight relative to new residential development. Most of the VNEB OA lies within the borough of Wandsworth and will be further connected to both Lambeth and Central London by two new underground stations on the Northern Line. The original masterplan set out two new centres to serve this new neighbourhood and beyond: a major new centre at Battersea Power Station and smaller centre in Lambeth at Vauxhall.

Map 3 – Vauxhall, Nine Elms and Battersea Opportunity Area



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Shared town centres

- Lavender Hill/Queenstown Road district centre
- Clapham South local centre

Central Activities Zone

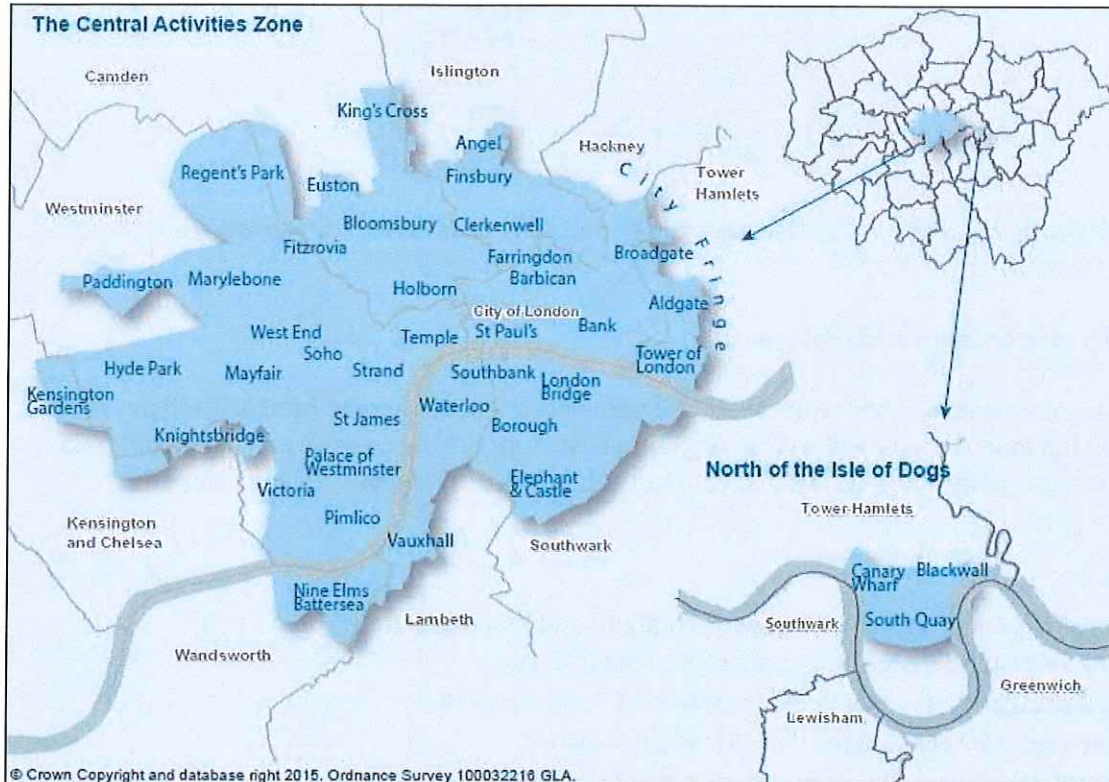


Figure 1 – Area of London Plan Central Activities Zone

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 Draft 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:

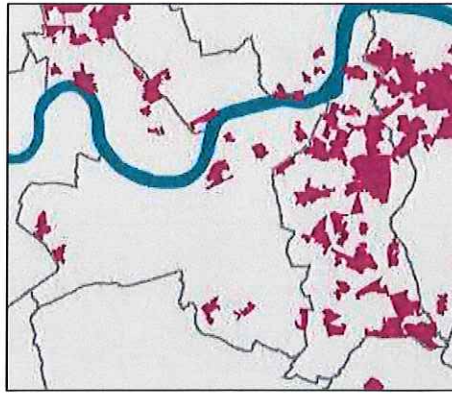


Figure 2 - Strategic Areas for Regeneration (based on 20 per cent most deprived lower super output areas in England)

The South London Innovation Partnership

This has been recently formed with Lambeth, Southwark and Lewisham to establish and deliver the South London Innovation Corridor. The programme will support the creative and digital business clusters including Battersea, Nine Elms, Vauxhall and Brixton in Wandsworth and Lambeth.

Transport

Main roads that cross the border between Lambeth and Wandsworth:

- A216 (Mitcham Lane) is a London Distributor Road
- A214 (Tooting Bec Road) is part of the TfL Road Network
- A24 (Balham Hill) is part of the TfL Road Network
- A205 (The Avenue) is part of the TfL Road Network
- A3 (Long Road) is part of the TfL Road Network
- A3036 (Lavender Hill / Wandsworth Road) is a London Distributor Road
- A3205 (Nine Elms Lane) is part of the TfL Road Network

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

- Vauxhall to Queenstown Road (South Western)
- Streatham Hill to Balham (Southern)
- Streatham Common to Balham (Southern)
- Clapham Junction to Wandsworth Road (Overground service)

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

- Vauxhall (Lambeth)
- Queenstown Road (Wandsworth)
- Wandsworth Road (Lambeth)
- Clapham Junction (Wandsworth)
- Streatham Hill (Lambeth)
- Streatham Common (Lambeth)
- Balham (Wandsworth)

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

- Northern Line

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

- Clapham South (Lambeth)
- Balham (Wandsworth)

Air quality

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

- Vauxhall Cross

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 28,000 in Wandsworth 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 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 within Action Zone 2 (Central London) and Wandsworth within Action Zone 1 (West London). The Plan outlines a number of recommendations to mitigate flood risk within the Central 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. Within the West Zone, the Plan outlines several recommendations including to agree a programme for planning and putting in place within 25 years, alternative measures for managing fluvial flood risk in the west London tidal area. 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.

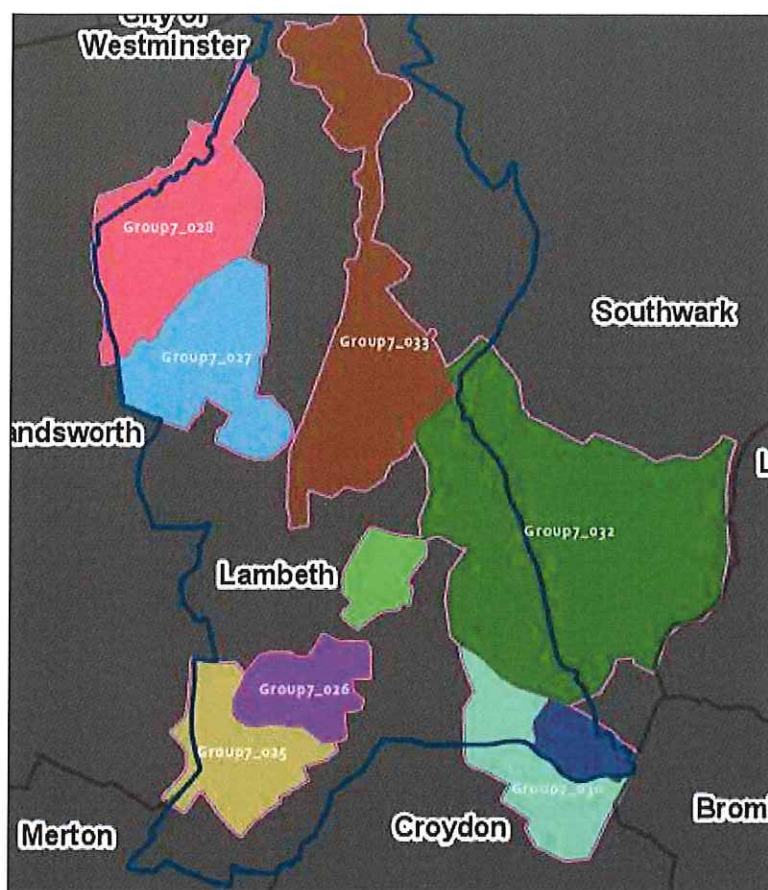


Figure 3 - Map of CDA(s) in Lambeth

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

- Group7_025
- Group7_027
- Group7_028

The provision of energy (including heat)

The Draft London Plan (DLP) 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 (see DRLLP policy EN3). 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 within the VNEB Opportunity Area.

Green infrastructure

Metropolitan Open Land (MOL) that crosses the borough boundary between the two parties:

- Clapham Common and associated playing pitches is managed by Lambeth only
- Tooting Bec and Graveney Commons (and associated playing pitches)

Metropolitan Open Land (MOL) in Lambeth adjoining Wandsworth:

- Woodfield Recreation ground is managed (by Enable) solely on behalf of Wandsworth. It is located entirely within LB Lambeth

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

- Clapham Common SINC

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

- Railway Lineside – Tooting Bec to Eardley Road SINC

Other green infrastructure in Wandsworth adjoining, or in very close proximity to Lambeth:

- Linear Park in Nine Elms (name not yet confirmed – incremental delivery which has commenced and will meet the local needs of the new Nine Elms residents in Wandsworth)
- Heathbrook Park

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 runs along the borough boundary between the two parties.

The Thames runs along the borough boundary between the two parties. There are River services on the Thames for both passengers and freight, and two safeguarded wharves within the Wandsworth VNEB on the 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.

Views, heritage, design and conservation

Westminster World Heritage Site

Both Lambeth and Wandsworth have a shared responsibility to protect the setting of the Westminster World Heritage Site. Both boroughs participate in the Westminster World Heritage Site Steering Group whereby they agree to work collaboratively with Westminster to protect the setting of the World Heritage Site.

The Vauxhall, Nine Elms, Battersea Opportunity Area Planning Framework (OAPF) sets out a tall buildings strategy which supports an emerging cluster at Vauxhall. It establishes a series of parameters, which respond to the need to protect the setting of the Palace of Westminster World Heritage Site (WHS) from key river prospects including Waterloo, Hungerford and Westminster Bridges.

Strategic and local views

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

Both Wandsworth and Lambeth have a shared responsibility as part of the Westminster World Heritage Site partnership.

Local views from Lambeth into Wandsworth:

- County Hall (LV 4): County Hall to Palace of Westminster - Wandsworth is not the focus of the view but the periphery.
- Battersea Power Station (LV 9): St George Wharf Pier to Battersea Power Station - The viewer is looking upstream towards Battersea Power Station. The River Thames largely occupies the foreground of the view.
- Brixton Historic Towers (LV 18): Brockwell Park to Lambeth Historic Towers - This view from Brockwell Park. Wandsworth forms the distant backdrop.
- Brixton Panoramic (LV 19): Battersea Park to The Gherkin and Canary Wharf - The view from Brockwell Park to the city is a broad panorama that ranges westwards across the very northern part of Wandsworth (from Battersea Power Station northward). Wandsworth is not the focus of the view but the periphery with the glimpses of the Power Station being the only feature within Wandsworth of note.
- Streatham Common (LV 20): Streatham Common (LV 20): Streatham Common to Rosehill, Pollards Hill, and Morden - Wandsworth is not the focus of the view but the periphery.

Local views from Wandsworth into Lambeth:

- View 2 – Downstream from Battersea Bridge – includes view of part of the VNEB including the Vauxhall Tower in Lambeth.
- View 3 Downstream from Albert Bridge – includes the tall buildings of the Nine Elms cluster which are emerging to the left of the view.
- View 4 Battersea Power Station from Chelsea Bridge – references consented schemes for tall building and the Vauxhall Tower Lambeth in the context of protecting the background of the Battersea Power Station chimney's silhouette.
- View 6 Battersea Power Station from Battersea Park tall buildings of the Nine Elms cluster are emerging to the left of the view – references Vauxhall Tower in Lambeth in the context of the background on the view of Battersea Power Station chimneys.

Conservation areas in Lambeth adjoining Wandsworth:

- Clapham (CA01)
- Streatham Park and Garrads Road (CA12)
- Hyde Farm (CA48)
- La Retrait (CA36)
- Wandsworth Road (CA59)
- Albert Embankment (CA57)
- Westow Hill (CA23)
- Streatham Common (CA43)
- Streatham Lodge (CA62)

Conservation areas in Wandsworth adjoining Lambeth:

- Clapham Common (CA1)

- Dinsmore Road (CA32)
- Old Devonshire Road (CA44)
- Park Town Estate (CA18)
- Garrads Road (CA43)

Historic parks and gardens in Lambeth adjoining Wandsworth:
None.

Historic parks and gardens in Wandsworth adjoining Lambeth:

- Clapham Common (Locally listed)
- Tooting Bec Common (Locally listed)

Archaeological priority areas in Lambeth adjoining Wandsworth:

- North Lambeth APA2
- Roman Road APA3
- Streatham APA15

Archaeological priority areas in Wandsworth adjoining Lambeth:

- Battersea Channel APA
- Clapham Common APA
- Stane Street APA
- Tooting Common APA

Lambeth cemeteries in Wandsworth:

- Streatham Cemetery
- Lambeth Cemetery
- Lambeth Crematorium

4. Strategic matters

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

a. Neighbourhood Planning

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

- Wandsworth **agrees** to keep Lambeth informed of any neighbourhood plans adjoining the borough boundary between the two parties, particularly those covering Tooting Bec where there are two Lambeth cemeteries

b. Housing

4.2a. Overall housing need

Housing need is a strategic issue dealt with at the regional level in London by the Mayor in the London Plan. 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.

Lambeth's position in its Draft Revised Lambeth Local Plan is that it is able to meet its own Draft London Plan housing target within its administrative boundary.

Wandsworth:

Whilst it is considered that Wandsworth will be able to meet its proposed housing targets, Wandsworth maintains its position of the London Plan examination: Wandsworth objects to the target but signals its intent on working towards meeting the target within its own borders.

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

Wandsworth:

Since 2009 there has been a significant decrease in both resident turnover and demand for traveller pitch licences in Wandsworth Borough.

As of April 2019, due to the low turnover rate and relatively settled status of the occupying households, the three vacant pitches, and a current lack of a waiting list for the site, there is no evidenced requirement or need for additional pitches on the existing (Trewint Street) site or elsewhere in the wider Borough.

There is also no evidence that the Borough needs to consider temporary site needs for show people, with no approaches having been made in this respect, according to records, over the intervening period since the last analysis was undertaken.

LB 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 show people 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.

- Going forward, both boroughs acknowledge the London Plan Inspector's report which recommended a strategic evidence base: 'the mayor should commit to leading a London-wide accommodation needs assessment for gypsies and travellers as soon as possible' to inform new London Plan policy.
- Wandsworth agrees that Lambeth can meet its identified need for gypsy and traveller pitches over the DRLLP PSV plan period within the confines of its own administrative boundary.

4.3 Employment, retail, leisure and other commercial development

The continued commercial success of the Central Activities Zone, which covers the northern extent of both Lambeth and Wandsworth 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 policy ED14 proposes to introduce a new policy to manage any further visitor accommodation in Vauxhall within the boundary of the Central Activities Zone. DRLLP H3 proposes to manage change of use of permanent residential accommodation to short-term holiday lets.

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

Vauxhall, Nine Elms Battersea Opportunity Area

The VNEB Opportunity Area is identified in the London Plan as overseen by the Nine Elms Vauxhall Strategy Board, a partnership of key stakeholders in the area including landowners, TfL and the GLA,

co-charged by the Leaders of both LB Lambeth Council and LB Wandsworth Council. The Board oversees the development of the OA and meets twice a year to review overall progress and manage strategic risks.

- Both parties agree to work collaboratively through the VNEB Strategy Board to deliver the housing and employment targets and any other strategic matters affecting VNEB.
- Both parties agree to work collaboratively to deliver the infrastructure identified via the Nine Elms DIRR study, where it is identified as having cross-borough implications.

Shared town centres

The DRLLP proposes to update policy to restrict the number and concentrations of betting shops and payday loan shops in specific town centres. Wandsworth has highlighted that this policy may give rise to likely impacts through displacement of demand.

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

Strategic Areas for Regeneration

- Both parties **agree** to work collaboratively to ensure that their respective policy approaches to Strategic Areas for Regeneration in their respective local plans are aligned.
- Both parties **agree** that joint work on employment benefits from the VNEB area via planning obligations (S106 agreements) have secured shared areas of benefit.

4.4 Health

Health infrastructure planning in both Lambeth and Wandsworth reflect the priorities of the respective Clinical Commissioning Groups Group - this has regard to and acknowledges potential movement of patients across the border between the two boroughs.

- Both parties acknowledge that there is likely to be cross border movements 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 meet the needs for strategic cross border health facilities including that in the Vauxhall Nine Elms Battersea OA
- Both parties **agree** to ensure that their infrastructure delivery plan acknowledge cross-boundary issues and take into account wider healthcare needs and service catchments.

It is important that health and wellbeing impacts of major developments on the border of each borough is considered so that overall health and wellbeing impacts on existing/new residents can be considered.

- Both parties **agree** to work collaboratively in terms of sharing of information about health impacts

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.

- Both parties acknowledge that there is likely to be cross border movements 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 to ensure that counter terrorism measures such as hostile vehicle mitigation are in place 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.

- 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 parking controls (for example, proposed new CPZs) where these may have a cross-border impact
- Both parties **agree** to ensure a co-ordinated approach to bus network and service improvements.
- Both parties **agree** to promote and support the development and implementation of improvements to local rail services
- Both parties **agree** to work collaboratively to support strategically important transport infrastructure
- Both parties **agree** to consult each other about proposals for Clapham Common and the wider area including any transport impacts
- Wandsworth **agrees** that, in order to mitigate impact of traffic associated with the redevelopment Pensbury Place waste transfer station, it will ensure cross-border consultation on all proposals to intensify the waste uses particularly in regard to transport impacts.
- Both parties **agree** to work collaboratively to improve cycle links through Tooting Bec Common

- Both parties **agree** they recognise and support the strategic need for a pedestrian and cycle crossing of the River Thames between Pimlico and Vauxhall Nine Elms
- Both parties **agree** to take a co-ordinated approach to construction, logistics and road safety in the VNEB OA.
- Both parties **agree** to work collaboratively to deliver the Nine Elms Cycle Strategy through the VNEB board.
- There is a point of disagreement concerning TfL's plan to replace the Vauxhall Gyratory. Wandsworth Council's position is qualified as: 'The proposals for the Vauxhall Gyratory support the ambitions of the Nine Elms Vauxhall Partnership for the transformation of the VNEB Opportunity Area into a new central London district. However, it is also important that the scheme does not have an adverse impact on traffic movement in Wandsworth borough.' Lambeth Council's position is that the Gyratory proposal has already been subject to extensive public consultation and traffic modelling by TfL, who are satisfied that traffic impacts are within acceptable levels, and it is therefore understood that TfL will implement the gyratory in the form proposed. Due to these factors and the benefits arising from the proposal, Lambeth are supportive of the scheme as currently proposed. Both parties **agree** to work collaboratively to deliver the removal of the Vauxhall Gyratory and mitigate local impacts should they arise.

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.

Wandsworth has five Air Quality Focus Areas entirely within the borough boundary: Clapham Junction/Falcon Road/Battersea Rise/Lavender Hill; Putney High Street/Putney Bridge Road/ Lower Richmond Road; Wandsworth Gyratory - Wandsworth High Street/Armoury Way; York Road (A3205) from Wandsworth Bridge to Latchmere Road. There is an Air Quality Action Plan place (2016-2021); a Clapham Junction Air Quality Action Plan and Tooting High Street Air Quality Action Plan (both 2018). This seeks to protect health, ecosystems and buildings, and to reduce pollution to below national air quality objectives. It contains measures to improve air quality across the borough helping to reduce the key pollutants – Nitrogen Dioxide (NO₂) and Particulate Matter (PM₁₀).

Wandsworth funds a dedicated Nine Elms Air Quality Officer to work in the Wandsworth section of the OA, who works closely with counterpart in Lambeth to manage the impact on air quality across the OA in Wandsworth.

A separate but related consideration relate to air quality management during the construction phase for Nine Elms to ensure adequately mitigated AQ impacts. Lambeth and Wandsworth work together on the co-ordination of construction logistics in the VNEB area.

- Lambeth and Wandsworth **agree** to cooperate in the implementation of each borough's respective strategies and action plans.
- 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).

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.

Both parties are part of the Cross London sub-regional grouping of boroughs for waste planning matters.

LB Wandsworth receives strategic amounts of waste exports from Lambeth as set out in the Lambeth Waste Evidence Base 2019. In addition to Lambeth's household waste, Lambeth also exports some CD&E waste to Wandsworth. No significant waste exports from Wandsworth are received in Lambeth.

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

4.11 Water supply, wastewater

- Each party **agrees** to support this 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 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 Wandsworth'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

Wandsworth 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).

- 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).

There is an Energy Masterplan for Vauxhall Nine Elms Battersea Opportunity Area (2012).

- 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.
- Both parties **agree** to work collaboratively and through the VNEB Board to ensure the continuing development and delivery of a coherent, low carbon energy supply system for the area.
- Both parties **agree** to take a co-ordinated approach to utilities co-ordination (in particular District Heat Networks)

4.14 Green infrastructure (i.e SINC and MOL)

- Each party acknowledges that Clapham Common (MOL) and Woodfield Recreation Ground and School Playing Field (MOL) are shared resources in terms of meeting green infrastructure needs, given their proximity to each borough's residents.
- Both parties **agree** to consult and to cooperate in respect of the management decisions on these spaces.
- Both parties **agree** to consult each other on any proposals that could impact on open spaces, outdoor recreation and other green infrastructure, including SINC and/or MOL, within the 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.

The DRLLP PSV 2020 follows the approach outlined in the Draft London Plan for zero carbon developments (see DLP policy SI2) and aligns with the Mayor's urban greening objectives (including adopting an urban greening factor – see DLP policy G5).

Wandsworth Council is formalising this commitment to environmental and sustainability issues via an ambitious ten-year strategy which will see Wandsworth become the greenest council in inner London and be carbon neutral by 2030 and zero carbon by 2050.

The Wandsworth Environmental and Sustainability Strategy (WESS) sets out the Council's ambitions for the next ten years in relation to urban greening, carbon reduction, air quality and waste and recycling. The Strategy will be supported by an annual action plan that will be driven forward by a senior leadership Climate Change Group ([Committee paper 19-197](#)).

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.

- Lambeth and Wandsworth agree to cooperate in the implementation of each borough's respective strategies and action plans.

4.16 River Thames

4.16.1 Policy approach

The River Thames provides a major asset that Lambeth and Wandsworth 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 that have an impact on the neighbouring borough either through views or infrastructure, 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

There are river services on the Thames for both passengers and freight, and two safeguarded wharves which handle waste and aggregates within the Wandsworth VNEB OA on the Thames.

- Both parties **agree** to work collaboratively to improve both passenger transport on the River and use of the River for freight movements.
- Both parties support river transport and agree there are no known planning reasons why these river services cannot continue.

4.16.3 River Thames 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.

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

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 Wandsworth, Local Plan policy DMS4 sets out the approach to assessing proposals for taller buildings, and a Local Views SPD was adopted in 2014.

- 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.
- 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.
- Both parties agree to work collaboratively on the Westminster World Heritage Site Management Plan with the stakeholders, and to uphold the VNEB Tall Buildings Strategy.

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).

Wandsworth has developed a Nine Elms Battersea Cultural borough-wide Culture Strategy for the sections of the VNEB OA within the Wandsworth border. This builds on the shared vision of all the VNEB Partners, and where appropriate involves Lambeth in the delivery of key joint events and an update to this Strategy has commenced. The Wandsworth Cultural Strategy seeks to achieve the creation of three cultural quarters – a design quarter in Battersea, a food and horticultural quarter around CGMA and a galleries and visual arts quarter. The latter two overlap with Lambeth's Gallery Quarter around Albert Embankment and the borough boundary at Wandsworth Road / Nine Elms Station. The Battersea Design Quarter is being brought forward by Wandsworth as one of the projects within the South London Innovation Corridor project which is a partnership between Lambeth, Wandsworth, Southwark and Lewisham.

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 review of the SCG.

Timetable for agreement, review and update

Local authority	Present plan adoption	Proposed plan review date	Target Reg 18 date	Anticipated Reg 19 date	Anticipated submission date
Lambeth	September 2015	October 2017	October 2018	January 2020	April 2020
Wandsworth	Core Strategy, Development Management Policies and Site Specific Allocations: March 2016; Local Plan Employment and Industry: December 2018	Winter 2018/19	Summer 2020	Spring 2021	Summer 2021

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.

It is agreed that these discussions will inform both the Lambeth Local Plan 2020 and Wandsworth Local Plan 2022 and both authorities will continue to work collaboratively in order to meet the duty to cooperate.

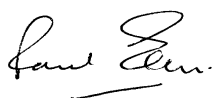
Signed: 

Name: Councillor Matthew Bennett

Position: Cabinet Member for Planning, Investment & New Homes

London Borough of Lambeth

Date: 08/01/2020

Signed: 

Name: Councillor Paul Ellis

Position: Cabinet Member for Strategic Planning and Transportation

London Borough of Wandsworth

Date: 17th December 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:

- 17th November 2015
- 3rd May 2017
- 15th March 2018
- 21st November 2018
- 30th October 2019

Air quality meetings:

Project	Partner
Schools Air Quality Audit Fund	GLA
Nurseries Air Quality Audit Fund	GLA
School Streets Campaign	Living Streets (Lead)
London Councils work into new AQ legislation	London Councils (lead), various other boroughs
Healthy Streets Everyday	Islington (lead), Cross River Partnership, 15 other boroughs, GLA (funders) – TBC
Clean Air Villages	Lewisham (lead), Cross River Partnership, Camden, H&F, RBKC, Wandsworth, Defra (funders)
Non Road Mobile Machinery register	King's College London, GLA, TFL, Brent, Camden, City of London, Croydon, Hammersmith and Fulham, RBKC, Islington, Lewisham, Tower Hamlets, 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
STARS programme	TfL
Pollution alerts to schools, GP surgeries and care homes	GLA, King's College London
Ultra-Low Emission Zone	GLA
Electric Vehicle Car Clubs project	GLA (funders), TfL
Statutory duties as Air Quality Management Area	GLA, Defra

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
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 Wandsworth'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 Wandsworth 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 Wandsworth 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 Wandsworth to make representations.

Lambeth Issues (regulation 18 part 1) consultation representations

On 20th December 2017, Wandsworth submitted comments to Lambeth as part of the Issues consultation. Of all of the questions answered, Wandsworth only disagreed with one which regarded the provision of short term lets, such as Airbnb, and their ability to meet demand for visitor accommodation. Wandsworth stated that the growing gap between demand and supply does not justify losing permanent housing. They supported use of student halls out of term time. A full breakdown of the comments provided by Wandsworth is viewable in the Issues Consultation Report October 2018.

Lambeth DRLLP (regulation 18 part 2) consultation representations

On the 17th December 2018, LB Wandsworth provided comments on the Draft Revised Lambeth Local Plan 2018. The table below outlines the points made by Wandsworth and the proposed Lambeth response.

Table 4 - DRLLP consultation 2018: Wandsworth representations and proposed Lambeth response

Representation Wording	Plan Section	Policy/Sites/ General/ Policies Map/Issue	Officer Response	Proposed Change in DRLLP PSV
<p>Thank you for providing the opportunity to comment on the above document. Following on from our recent Duty to Cooperate meeting I can confirm that we are broadly supportive of the policy approach and that each Council has committed to preparing bilateral statements of common ground in due course. Lambeth's updated evidence base is noted, and as many policy areas share common geographies the methodology and content may be helpful informing Wandsworth's own evidence base.</p> <p>Officers have a number of comments on some of the consultation topic areas as follows:</p>	General	Duty to Cooperate	Noted. Specific comments raised on the draft Local Plan have been addressed individually per chapter and policy of the document.	No change.
<p>Housing, including students and older people, gypsies and travellers: From a housing perspective and in respect of those matters which may impact housing in Wandsworth the Council have no comments to make.</p>	Section 05	General	Noted.	No change.
<p>The policy position on student housing and older peoples housing is noted and is broadly in line with the Council's preferred approach.</p>	Section 05	H07	Noted	No change.

<p>The Council is intending to update its evidence on gypsy and traveller accommodation including if people identifying as gypsies and travellers occupying bricks and mortar accommodation indicate they wish to have a pitch. We note Lambeth's updated evidence on gypsy and traveller needs and we will take this on board in establishing evidence for the Wandsworth Local Plan review. The Council does not accept the London Plan's proposed definition of gypsies and travellers, and notes that the evidence (Fordhams 2008) is out of date and has made a representation to this effect. Officers can discuss methodology and evidence on gypsy and traveller need in Wandsworth with you as required through the Duty to Cooperate.</p>	Section 05	H10	Noted	No change
<p>Economy (CAZ, town centres, offices, affordable workspace): Town Centres</p> <p>General comments: Wandsworth effectively shares centres at Vauxhall, Clapham South and Lavender Hill/Queenstown Road, as well as many non-designated parades running along main roads on either side of the borough boundary. As such officers look forward to working through the details of policy development relating to town centre uses and the evening economy to ensure that the policy approach is supportive and mutually compatible.</p> <p>The Council looks forward to working together on future policy development.</p>	Section 06	ED07	Comment noted. Matters relating to cross border town centres will be addressed in the Statement of Common Ground between the two boroughs.	No change.
<p>The Council is supportive of the approach to secure Affordable Workspace, especially through Affordable rent which is an approach Wandsworth Council has recently adopted.</p>	Section 06	ED02	Support noted.	No change.

<p>A2 uses/betting shops/payday loans: Introduce new policy to prevent concentrations and clustering of betting shops and payday loan shops in town centres</p> <p>The Council is in overall agreement with the identification of issues, particularly the negative effects on vitality and viability of identified town and local centres and the smaller parades. Your updated evidence on these uses and how these uses can adversely affect public health is noted.</p> <p>The policies do acknowledge impact on health and well-being and amenity of 'neighbouring areas' and officers would like to work jointly with you on this matter so that both the updated Lambeth and Wandsworth Local Plans once adopted, will support each other in achieving a shared, desired outcome.</p>	Section 06	ED10	Support noted. Where there are likely to be cross-border impacts, this issue can be addressed in the Statement of Common Ground between the two boroughs.	No change
<p>The Sustainability Appraisal does not appear to consider the likely impacts of policies seeking to control these uses on adjoining boroughs such as through displacement of demand.</p>	Sustainability Appraisal		Noted. This will be addressed in the next iteration of the SA.	No change.
<p>Hotel and visitor accommodation: the general approach is supported. Lambeth's preferred policy position controlling short stay accommodation is noted, and this, and the evidence base will be taken into account and discussed further as necessary and through the Duty to Cooperate meetings regarding Wandsworth updated policy options.</p>	Section 06	ED14	Support noted. Where there are likely to be cross-border impacts, this issue can be addressed in the Statement of Common Ground between the two boroughs.	No change.
<p>Air quality: The Council is supportive of the approach set out in the Draft London Plan and that Lambeth propose to be in line with these policies.</p>	Section 09	Air Quality	Noted.	No change
<p>Waste: The overall position on managing the Lambeth waste apportionment figure is supported and officers have sent comments on the draft MOU by separate email exchange.</p>	Section 09	EN07	Noted. The issue of waste will be addressed in the Statement of Common Ground between the two boroughs.	

Schedule of representations received from Lambeth in the Regulation 18 Wandsworth Local Plan 2018 Issues Document

On the 5th February 2019, LB Lambeth provided comments on the Regulation 18 Wandsworth Local Plan 2018 Issues document. The table below outlines the points made by Lambeth.

Representation Wording	Wandsworth Response (In progress, yet to be published)
<p>Question 37 - Is the approach to out-of-centre development, including seeking mixed uses on redevelopment sites such as the riverside and Focal Points of Activity, still appropriate in light of new national policy which supports a 'town centre first approach' and identifies a need to ensure resilience?</p> <p>Wandsworth should ensure that town centre uses, even at small scale, outside of the defined town centre hierarchy do not detrimentally impact on retail provision in neighbouring boroughs' designated town centres. Policies should ensure town centre uses are only considered in out of centre locations if a sequential test, and if necessary, an impact assessment, have been undertaken in line with national policy, taking account of town centres across borough boundaries. Lambeth would like to be consulted on any such schemes in Wandsworth that are in close proximity to the borough boundary.</p>	
<p>Question 55 - Do you support a shift away from car use to people using public transport, walking or cycling?</p> <p>Lambeth's Draft Transport Strategy emphasises the need to reduce traffic levels in the borough, both in terms of private motor vehicle trips made by our residents and in terms of trips to and through Lambeth that originate elsewhere. We therefore would encourage Wandsworth to work with other boroughs in the sub-region to develop a co-ordinated approach to traffic reduction and to the promotion of improvements to public transport, including the South London Metro concept, as well as in the effective integration of a new generation of cycle routes across borough boundaries.</p>	
<p>Question 84 - Are there any sites or locations that should be considered as a site allocation as part of the Local Plan review for waste management?</p> <p>The NPPW and Draft London Plan direct new waste facilities to industrial land.</p>	
<p>Question 85 - Should the Council continue to protect its existing safeguarded waste management sites and if not/so why?</p> <p>Both the current London Plan and the Draft London Plan require boroughs to safeguard waste sites for waste uses. A waste site can only be redeveloped for other uses if equivalent compensatory capacity is re-provided.</p>	