

Statement of Common Ground between  
City of Westminster  
and  
London Borough of Lambeth

December 2019

## 1. Executive Summary

This Statement of Common Ground has been prepared to demonstrate that Westminster's City Plan 2019 – 2040 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). It focusses on areas of agreement or disagreement between both authorities 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.

WCC 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
- City of Westminster

Given the close alignment of both Westminster 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 plans/ 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 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.

## **LB Lambeth**

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

## **City of Westminster**

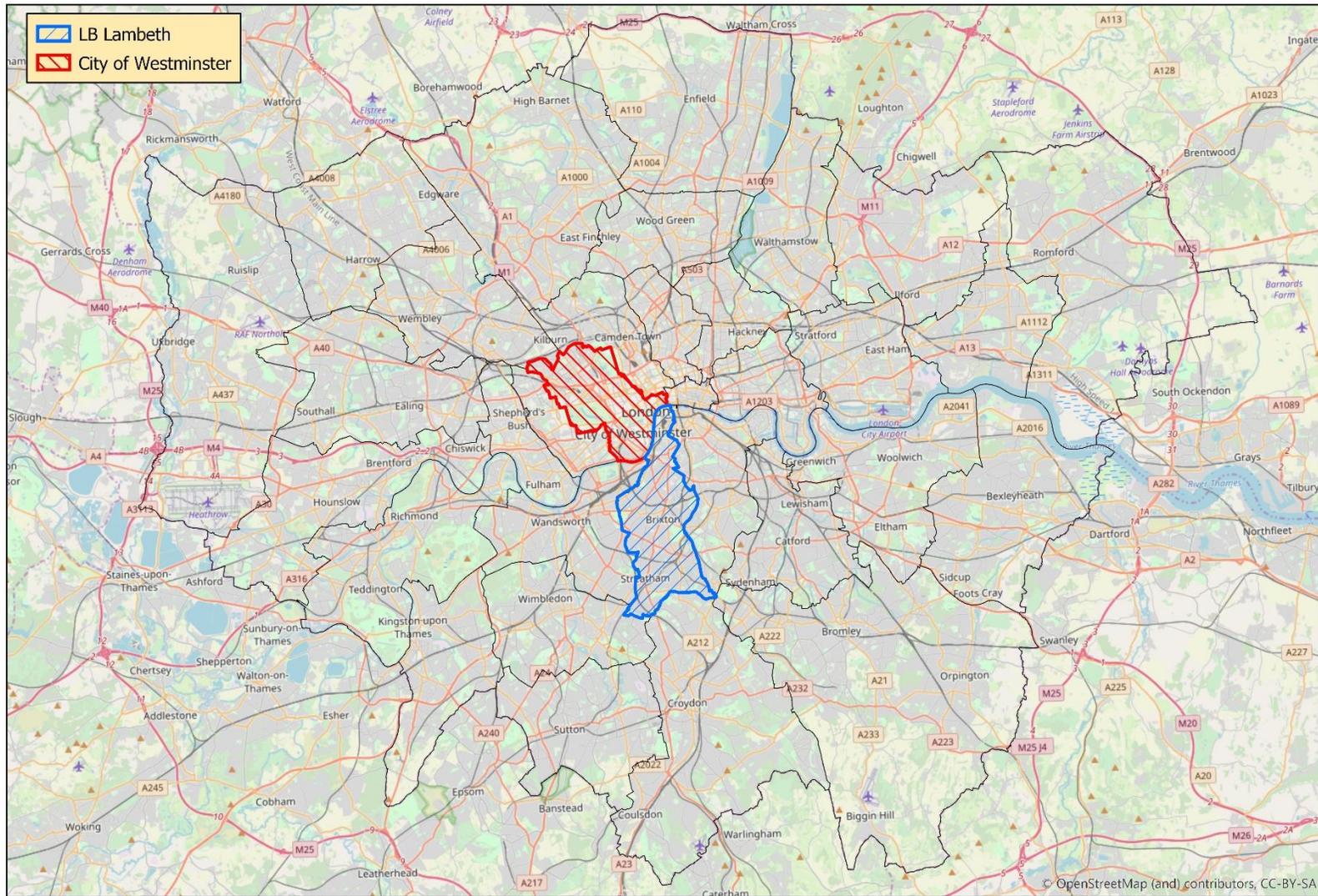
Sitting at the heart of central London, the City of Westminster is bordered by the London Boroughs of Camden, Brent, Lambeth and Wandsworth, the City of London and the Royal Borough of Kensington and Chelsea. The London Borough of Southwark is also in close proximity to Westminster's south-eastern border at the River Thames.

Westminster and Lambeth do not share a land border but sit on opposite sides of the River Thames with a border down the centre of the River Thames of just over 3 km. This Statement includes the whole of the LB Lambeth and the whole of the City of Westminster.

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

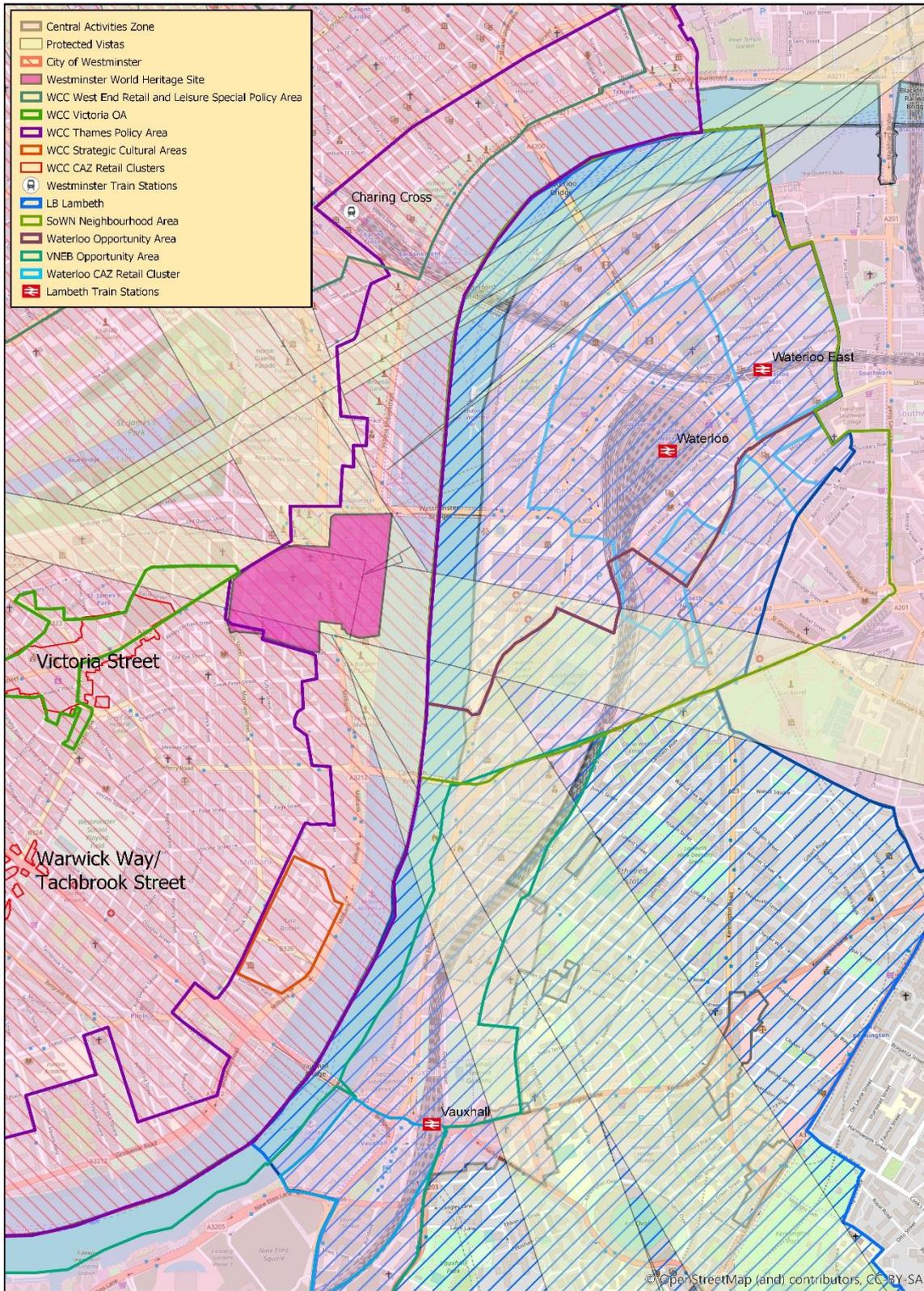
Map 1 – Authorities involved in this Statement



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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 spanning the borough boundary between the two parties.

In Westminster the Pimlico neighbourhood area areas lie in close proximity to the Lambeth boundary. Pimlico Neighbourhood Forum ran a Regulation 14 formal consultation on their draft neighbourhood plan between 31<sup>st</sup> July and 10<sup>th</sup> October 2019.

In Lambeth, one designated neighbourhood area, South Bank and Waterloo Neighbours (SoWN), lies in close proximity to the City of Westminster borough boundary. It is a designated business area. SoWN's proposed neighbourhood plan has proceeded to referendum. 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 on the making of the draft NDP in December.

## Economy, retail and commercial

### Shared town centres

None.

### Employment

### *Central Activities Zone*

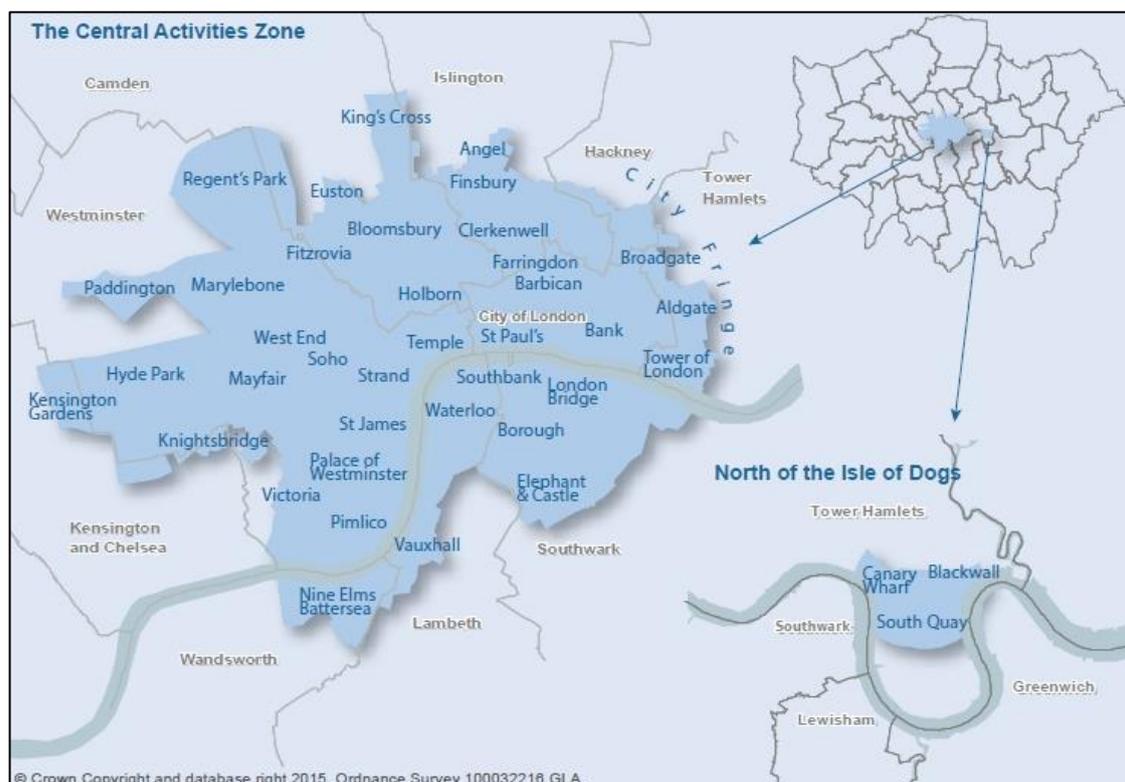


Figure 1 – Area of London Plan Central Activities Zone

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.

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

One of the most important strategic issues for both parties is the Westminster World Heritage Site (WWHS) and its setting. During the 2011 UNESCO Mission to the Westminster World Heritage Site concerns were raised about the impact of recent and proposed development on the immediate and wider setting of the WHS. Following the Mission, UNESCO requested that further work be undertaken in this area. As a response to UNESCO's concerns, Lambeth instigated its own research to help inform local policies. From the outset, Lambeth has shared its investigations with other stakeholders, in particular through activities of the WWHS Steering Group. Westminster is leading on the production of the Westminster World Heritage Site Management Plan.

#### Conservation areas in Lambeth adjoining Westminster:

Albert Embankment (CA57)      South Bank (CA38)

#### Conservation areas in Westminster adjoining Lambeth:

- Strand
- Savoy
- Whitehall
- Westminster Abbey & Parliament Square
- Smith Square
- Millbank
- Pimlico

### **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 Parliament Hill Oak Tree to Palace of Westminster
- Protected Vista Parliament Hill Summit to Palace of Westminster
- Protected Vista Westminster Pier to St Pauls Cathedral
- Protected Vista King Henrys Mound to St Pauls Cathedral

#### Local views from Lambeth into Westminster:

- Queen Elizabeth Hall (LV 2)
- County Hall (LV 4)
- Lambeth Palace (LV 6)
- Lambeth Palace Gardens (LV 7)
- Brixton Rooftop (LV 12)
- Gipsy Hill (LV 17)

- Brixton Historic Towers (LV 18)
- Brixton Panoramic (LV 19)
- Norwood Park (LV 22)
- Courtenay Street (LV 27)
- Royal Festive Hall

Local views from Westminster into Lambeth:

- Westminster's local views are listed [here](#).

**Transport**

Shared bridges which cross the borough boundary between the two parties:

- Vauxhall, Lambeth, Westminster, Hungerford, Jubilee and Waterloo

Main roads that cross the borough boundary between the two parties:

- A202 (Vauxhall Bridge Broad) is part of the TfL Road Network
- A3202 (Lambeth Bridge) is part of the TfL Road Network
- A302 (Westminster Bridge) is part of the TfL Road Network
- A4200 (Waterloo Bridge) is a London Distributor Road

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

- South Eastern mainline between London Charing Cross and London Waterloo East (Hungerford Bridge)

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

- London Charing Cross (Westminster)
- Waterloo East (Lambeth)

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

- Bakerloo Line
- Jubilee Line
- Northern Line
- Victoria Line

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

- Waterloo (Lambeth) (Bakerloo, Northern and Jubilee lines)
- Embankment (Westminster) (Bakerloo and Northern lines)
- Green Park (Westminster) (Jubilee Line)
- Vauxhall (Lambeth) (Victoria Line)
- Pimlico (Westminster) (Victoria Line)

**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 likewise thousands in Westminster who would otherwise be at risk of tidal and fluvial flooding. The Thames tidal defences also includes tidal walls and embankments along the banks of the River Thames. Should they fail or become breached the areas most at risk of flooding would be in the north of Lambeth and the south of Westminster, but this could also impact on the surrounding neighbourhoods. The Environment Agency holds tidal breach modelling. This is also detailed within Westminster's SFRA and 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 the City of Westminster 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.

### **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.

### **River Thames**

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

- River Thames and Tidal Tributaries Metropolitan SINC

Site of Metropolitan Nature Importance that crosses the borough boundary between the two parties:

- River Thames

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

### **Green infrastructure**

There is no green infrastructure spanning the borough boundary between the two parties.

## 4. Strategic matters

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

### 4.1 Neighbourhood Planning

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

### 4.2 Housing

#### 4.2a. Overall housing need

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

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

#### 4.2b. Affordable housing

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

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

#### 4.2c. Gypsies and Travellers

The City of Westminster has no existing gypsy and traveller accommodation within its border and no identified need for pitches within the City Plan period.

Lambeth has a need for 3 pitches for gypsies and travellers between 2019/20 and 2034/35, which equates to one pitch every five years. There is no identified need for plots for travelling showpeople in the borough. Lambeth will meet the needs of Lambeth's gypsy and traveller community over this period by safeguarding the existing gypsy and traveller site in Streatham Vale (Lonesome depot) and managing churn in vacant pitches on this site to meet identified future need.

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

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

The continued commercial success of the Central Activity Zone, which covers much of Westminster and the northern extent of 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

#### 4.4 Health

Health infrastructure planning in Lambeth and Westminster reflects the priorities of their respective Clinical Commissioning Groups (the Lambeth Clinical Commissioning Group and the Central London and West London Clinical Commissioning Group). This approach has regard to and acknowledges potential movement of patients across the border between the two boroughs.

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

- Both parties acknowledge that there is likely to be cross border 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 Draft Infrastructure Delivery Plan 2019 and the Westminster draft Infrastructure Delivery Plan (2019).

- Both parties acknowledge that there is likely to be 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

- Lambeth seeks to work collaboratively on the delivery of digital connectivity infrastructure where there are cross-border implications. Westminster **agrees** to work collaboratively on the development and outcomes of all schemes, which may have an impact on traffic flows, across the boundaries.

#### 4.7 Security

- Lambeth seeks to work collaboratively on counter terrorism measures such as hostile vehicle mitigations. Westminster **agrees** to work collaboratively on the development and outcomes of all schemes, which may have an impact on traffic flows, across the boundaries.

#### 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
- Lambeth seeks to take a co-ordinated with TfL approach to bus corridors and bus priority measures. Westminster **agrees** to work collaboratively on the development and outcomes of all schemes, which may have an impact on traffic flows, across the boundaries.
- Upcoming proposals for Parliament Square could have major traffic impacts on Central London and on Lambeth. Westminster **agrees** to give full consideration to Lambeth's comments on the proposal in relation to the potential traffic impacts on Lambeth and work collaboratively to identify mitigation measures where necessary.
- Westminster and Lambeth **agree** to work collaboratively on the development and outcomes of all schemes, which may have an impact on traffic flows, across the boundary between the two parties.

#### *Transportation of City of Westminster waste through Lambeth*

WCC refuse/recycling collection vehicles travel through Lambeth en route to the South East London Combined Heat and Power (SELCHP) site, a major waste incineration plant located in South Bermondsey. Lambeth considers this traffic contributes to congestion, poor air quality and, on some occasions, road safety issues in Lambeth. Lambeth formally raised the transportation of Westminster waste vehicles as a cross border strategic issue through consultation of the Draft Westminster City Plan. See appendix 2 for full correspondence between the two parties on this matter.

Westminster has recently committed Community Infrastructure Levy funding to convert street cleansing vehicles operating in the West End to electric power. This is the first stage before procuring a new fleet of waste collection vehicles to operate across Westminster. The current intention is that the new waste fleet will be electric (or potentially hydrogen) powered to deliver the council's ambitions for air quality.

Westminster has said that when contracts are renewed, they will review the routes taken by waste vehicle contractors and seek to avoid the future use of Lambeth Bridge.

Lambeth does not consider that its concerns have yet been fully addressed and wish to agree a timetable and process by which potential solutions will be considered, involving Lambeth.

- Both parties **agree** that the routes taken by waste vehicles have harmful implications for air quality, traffic congestion and in some cases road safety in Lambeth
- Both parties **agree** that this is a cross border issue that cannot be dealt with through the local plan process.
- Lambeth considers that this is a strategic matter - Westminster **disagrees**.
- Both parties have **not yet agreed** a process and timetable for addressing Lambeth's concerns.

### *Car parking*

Westminster considers that its plan seeks to prioritise sustainable modes of travel including walking, cycling and public transport, to minimise congestion and pollution from private car use. It does however recognise the high levels of growth expected in areas where there is already very high on-street parking stress. It therefore allows for limited provision for off-street car parking in new residential developments in the Paddington and Marylebone areas only (parking zones B and F, shown on Figure 24 in the draft City Plan). This represents a significant reduction in allowance for new off-street car parking than in previously adopted policies in Westminster, and earlier drafts of the plan – in response to concerns raised by the Mayor of London, Transport for London, and the London Borough of Lambeth.

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.

In Lambeth's view, Westminster's proposed approach will generate additional vehicle movements - some through Lambeth - which will have harmful impacts on traffic congestion, road safety and air quality in Lambeth. Lambeth's position is that Westminster should adopt DLP maximum car parking standards.

- Lambeth **disagrees** with Westminster's approach to its car parking policy.

## 4.9 Air quality

The whole of Westminster and Lambeth are designated as Air Quality Management Areas, with Air Quality Focus Areas defined in Draft London Plan paragraph 9.1.8.

Westminster have produced an Air Quality Manifesto, published an Air Quality Action Plan (which is currently being updated) and launched the *#DontBeldle* campaign to encourage drivers to switch off their engines when stationary.

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.

- 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 2).

However, Lambeth has ongoing concerns about Westminster’s approach to transportation of waste through Lambeth and Westminster’s approach to car parking (see 4.8 above), which in Lambeth’s view adversely affects air quality in Lambeth.

#### 4.10 Waste management

Each Waste Planning Authority is expected to plan for their identified waste needs, including planning to meet London Plan apportionment targets.

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

The scale of commercial activity that takes place in Westminster results in unusually high levels of waste production. The highly urbanised nature, lack of brownfield/ex-industrial sites and heritage sensitivities of the city also means identifying sites for future waste management is a significant challenge. Westminster is engaging with the Mayor on its conformity with the London Plan regarding its waste apportionment<sup>2</sup>.

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

- Westminster **agree** that there are no implications from Lambeth’s position regarding strategic waste matters.
- Lambeth cannot express a view at this stage because the WCC position is unknown.

#### 4.11 Water supply, wastewater

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 ensuring 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,

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<sup>2</sup> As set out in the Statement of Common Ground between Westminster, the Mayor and Westminster’s other neighbouring boroughs

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 Draft Revised Lambeth Local Plan policy EN4. In Westminster policy 36 sets out that WCC may use planning conditions to ensure necessary water or sewerage network upgrades<sup>3</sup>.

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.

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

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

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

- Both parties are separated by the River Thames and therefore acknowledge that this may be a barrier to any potential cross boundary energy infrastructure networks.

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

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

#### 4.15 Planning measures to address climate change mitigation and adaptation

City of Westminster declared a climate emergency in September 2019 and committed to ambitious carbon reduction targets. The City Council will be carbon neutral by 2030 and the whole city will follow suit by 2040 – ten years ahead of government targets. This target will inform everything

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<sup>3</sup> As set out in Westminster's schedule of minor modifications

Westminster does as we strive to meet the challenges of climate change and delivery a carbon neutral city.

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

- Both authorities **agree** to follow the approach outlined in the London Plan for zero carbon developments (see DLP policy S12) 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 Westminster 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.

- Lambeth notes the boundaries to the Thames Policy Area identified in Westminster's City Plan, which adjoins Lambeth's boundary and the policy approach to development within this 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.

##### *4.16.2 River services*

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

##### *4.16.3 Sites of Importance for Nature Conservation*

- Both parties **agree** to consult each other on any proposals that could impact on the River Thames and Tidal Tributaries Metropolitan SINC.
- Both parties **agree** to have regard to the River Thames and Tidal Tributaries Metropolitan SINC designation and each other's respective Local Plan policies when determining applications that could impact on this designation.

##### *4.16.4 Bridges*

Lambeth's draft new Transport Strategy proposes a network of strategic cycle routes that tend to lead to River Thames crossings.

TfL has identified that junctions at either end of Lambeth Bridge require safety improvements. Plans for improvements on the Lambeth side are well advanced, but delivery of these is dependent on agreement of corresponding changes on the Westminster side. At present, Westminster has not agreed the changes put forward by TfL and this matter remains to be resolved.

- Lambeth seeks to agree that the boroughs jointly assess cycling connectivity on or in close proximity to the borough boundary where bridges join both boroughs and to analyse the capacity of bridges to facilitate the development of Lambeth's Transport Strategy. Lambeth has requested a specific commitment from Westminster. Lambeth also seeks to work collaboratively to improve cycle ways across each bridge.
- Westminster **agrees** to work collaboratively with Lambeth on the development and outcomes of all cycling schemes which cross the borough boundary, which may have an impact on traffic flows, across the boundaries.

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

##### *Westminster World Heritage Site*

Both parties have worked collaboratively to improve the protections of the Westminster World Heritage Site and its setting in response to the recommendations of the 2017 Mission to the site, and to ensure the impacts of tall buildings in Vauxhall and Waterloo on the setting of the Site and protected views are understood. Lambeth is an active member of the Westminster World Heritage Site Steering Group which is chaired by Westminster and this provides a forum where significant schemes and projects in both boroughs with an impact on the site and protected views are discussed.

Lambeth and Westminster jointly developed the [Westminster World Heritage Site Setting Study](#) in 2018. Work on this document was informed by the World Heritage Site Steering Group.

Lambeth has inputted positively into the emerging Westminster World Heritage Site management plan – which informs the evidence base for both local plans and has taken the lead in the development of 3D modelling work in relation to building heights in Lambeth and their potential impact on the site. This work has helped to inform DRLLP policy Q19.

- Both parties **agree** to safeguard the integrity of the Westminster World Heritage Site and its setting.
- Both parties **agree** to continue to support and contribute to the steering group, to work to protect both the Outstanding Universal Value of the World Heritage Site and other significant cross borough views
- Both parties **agree** to further develop mutual understanding of the setting of the World Heritage Site and the impact of tall buildings site through use and development of shared 3D modelling.
- Both parties **agree** to continue to work collaboratively and accelerate work on the Westminster World Heritage Site Management Plan.

##### *Views, heritage, design and conservation*

Within Lambeth, areas appropriate for tall buildings have been identified in the draft revised Lambeth Local Plan Annex 1, supported by policy Q26. Likewise, broad locations suitable in principle for higher buildings have been identified in Policies 42 and 43 of Westminster's draft City Plan. The policies follow a 'context height' approach to determining appropriate heights.

- Both parties **agree** to have regard to the London View Management Framework (LVMF) and respective local plan policies when considering development proposals that could affect strategic and local views
- 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.
- 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 in accordance with the relevant legislation and policy, and consult each other on any proposals that could impact on these designations.

#### 4.18 Cultural infrastructure

Westminster's City Plan identifies Strategic Cultural Areas in Knightsbridge, Millbank, and the West End. The North bank is also identified in Westminster's draft City Plan as an area for public realm improvements, which could also have implications for culture positive contributions to culture.

The Southbank Strategic Cultural Area is partly in Lambeth, and is opposite Westminster's north bank.

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).

- Lambeth **agrees to engage with WCC** on Westminster's emerging detailed policy guidance for the North Bank – to ensure co-ordinated proposals within the Mayor's requirements for a Thames Strategy.

## 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	Anticipated Reg 19 date	Anticipated submission date
Lambeth	September 2015	October 2017	October 2018	January 2020	April 2020
Westminster	November 2016	June 2017	June 2017	June 2019	November 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:

Signed:  \_\_\_\_\_

Name: Councillor Richard Beddoe

Position: Cabinet Member for Place Shaping and Planning

***City of Westminster***

Date: 13 November 2019

## **Appendix 1 – Preparation of this statement of common ground**

The 2019 preparation process for this SCG is set out below:

- 22<sup>nd</sup> March– first draft SCG prepared by City of Westminster and sent to Lambeth. This SCG proposed to include all of Westminster’s neighbouring boroughs in one joint statement.
- 11<sup>th</sup> April – LBL responded to Westminster by stating a preference for bi-lateral SCG and providing comments on the initial draft prepared by Westminster.
- 25<sup>th</sup> September 2019 - Lambeth prepared and sent through a draft bi-lateral SCG to Westminster.
- 26<sup>th</sup> September – Westminster sent to Lambeth a revised draft SCG for all its neighbouring boroughs.
- 18<sup>th</sup> October – both parties met to discuss the format of the SCG. Both parties agreed to create a bi-lateral SCG. Westminster sought agreement of the SCG by 25<sup>th</sup> October. Lambeth advised this was not possible given their sign off process and it could not be formally agreed until December. Lambeth agreed to investigate an earlier in principle agreement by 13<sup>th</sup> November.
- Lambeth agreed a holding statement on 29<sup>th</sup> October 2019. This stated that Lambeth would seek in principle agreement on 13<sup>th</sup> November with final agreement in December 2019.
- 6<sup>th</sup> November – officer level agreement on proposed SCG.

## Appendix 2 - Schedule of engagement between the parties

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

- 30<sup>th</sup> June 2017 (with Southwark, Wandsworth, GLA and Historic England to discuss WHS Management Plan).
- 28<sup>th</sup> September 2017
- 16<sup>th</sup> April 2018 (with the GLA to discuss WWHS Setting Study)
- 16<sup>th</sup> May 2018
- 1<sup>st</sup> August 2018 - email sent by Lambeth questioning waste routes taken by Westminster waste vehicles through Lambeth)
- 5<sup>th</sup> December 2018 (email regarding waste routes taken by Westminster waste vehicles through Lambeth also re-sent on this date)
- 1<sup>st</sup> March 2019
- 3<sup>rd</sup> April 2019 – email reply sent by Westminster explaining routes taken by Westminster waste vehicles through Lambeth
- 22<sup>nd</sup> May 2019 – further questions sent by Lambeth regarding Westminster waste vehicles through Lambeth
- 18<sup>th</sup> October 2019
- 23<sup>rd</sup> October 2019 – email reply sent by Westminster providing further explanation on routes taken by Westminster waste vehicles through Lambeth

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
<b>Statutory duties as Air Quality Management Area</b>	GLA, Defra

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

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. Air quality organisations both authorities participate in

Flood officer meetings:

Westminster's and Lambeth's Flood Officer meet with each neighbouring council 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):

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

### **Appendix 3 - Evidence of activities undertaken to address an issue**

Local Plan consultations:

On 12<sup>th</sup> November 2018 Westminster notified Lambeth that it was consulting on its new draft City Plan under regulation 18. This consultation ran for six weeks. Lambeth submitted a response to this consultation on 21<sup>st</sup> December 2018 (shown in table below).

On 19<sup>th</sup> June 2019 Westminster notified Lambeth that it was consulting on its new draft City Plan under Regulation 19. This consultation ran for six weeks. Lambeth did not submit a response to this consultation.

On 9<sup>th</sup> October 2017, Lambeth notified the City of Westminster 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 Westminster to make representations. City of Westminster did not submit a response.

On 22<sup>nd</sup> October 2018, Lambeth notified the City of Westminster 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 Westminster to make representations. City of Westminster did not submit a response.

The table below sets out how comments made have been addressed to date.

Schedule of comments made by Lambeth and Westminster response.

Matter	Lambeth comment	Westminster response
Parking policy	<p><b>Regulation 18 representation 21 December 2018</b></p> <p>Lambeth’s Draft Transport Strategy (2018) has a key objective of reducing traffic levels in the borough and our Draft Revised Lambeth Local Plan (October 2018) seeks to embed this by restricting the amount of parking permitted in new developments, reflecting and indeed going further than the Draft London Plan in this respect. A key source of concern is the level of through traffic Lambeth suffers from due to its location on key routes providing access to central London. Many trips to Lambeth and trips passing through Lambeth have Westminster as an origin or destination. We are therefore concerned that Westminster’s proposed maximum residential parking standards (set out in Appendix 2 of the Draft Westminster City Plan) are not justified and do not reflect the need to deter the generation of additional car trips in central London and that our residents will be exposed to the negative externalities of additional traffic on Lambeth’s streets as a consequence. Congestion, road safety and air quality are particular concerns in this respect. We also note that the proposed parking standards do not appear to be in general conformity with the Mayor’s proposed standards, which require car-free development in central London; and indeed contrast starkly with the approach taken by other central London authorities, notably the City of London in their draft Local Plan also out to consultation. In Lambeth’s view, Westminster’s residential parking standards should be the same as those in the Draft London Plan.</p>	<p>As set out in Westminster’s Consultation Statement (published 28<sup>th</sup> October 2019):</p> <p>The council considers the City Plan strikes a balance between the merits of the private car and the transition to sustainable modes of transport and that this is an appropriate evidence-based departure from the new London Plan’s approach to parking, as justified in the policy. The council have agreed a statement of common ground with the Mayor and TfL on this objection [relating to the conformity of policy with the London Plan] and will continue dialogue to reach a resolution.</p>
Waste-related traffic movements	<p><b>Regulation 18 representation 21 December 2018</b></p> <p>Lambeth’s policies also seek to reduce the impact of large vehicles on our streets and to confine non-local traffic to the Strategic Road Network in order to protect residential areas. We are aware that Westminster waste disposal vehicles are operating on Lambeth’s highways and request further information about these movements. If some of Westminster’s waste is travelling through Lambeth to</p>	<p><b>3<sup>rd</sup> April 2019 Westminster email reply</b></p> <p>As part of our informal City Plan consultation, you requested information on waste routes through Lambeth. Apologies for the delay in sending this information across.</p> <p>Please find the travel routes for WCC refuse/recycling collection vehicles through Lambeth attached. Deviations are only made when</p>

<p>reach its management destination, this will obviously have impacts on Lambeth's roads in terms of traffic volumes, congestion, road safety and air quality.</p> <p>As noted in our email of 1 August 2018 and in our 'duty to cooperate' meeting held in November 2018, we set out below what we understand to be the position with regard to movement of waste that arises in Westminster and whether this may be travelling through the London Borough of Lambeth:</p> <ul style="list-style-type: none"> <li>• Westminster has contracts with Veolia for household and industrial/commercial waste (HIC waste)</li> <li>• Residual waste goes to SELCHP in LB Lewisham, and may pass through Lambeth to get there</li> <li>• Recyclables go to MRFs in either Southwark and Greenwich (depending on the type of material), and again may pass through Lambeth to get there</li> <li>• A small amount of HIC waste (c5kt) also goes to Smuggler's Way in Wandsworth</li> <li>• Construction, demolition and excavation waste (CD&amp;E) waste mainly goes north, west and north east so the majority probably does not travel through Lambeth, but a significant amount (c15kt) goes to Greenwich waste transfer stations, and so may pass through Lambeth.</li> </ul> <p>We would like to understand more fully the volumes of waste that are travelling through the borough, how frequently and by which routes. In particular, we wish to understand the potential to re-route these vehicles, making use of more suitable corridors, including greater use of the river for waste movements. For residual movements, we seek to agree prescribed routes that protect local streets and also to ensure that both vehicles and drivers are provided with the latest safety equipment and training in order to minimise the threat posed to vulnerable road users.</p> <p>We note for information that there was an accident on 29 June on Wincott Street in Lambeth involving a motorcyclist and a Westminster Council bin lorry. Whilst there is no suggestion that the bin lorry was at fault, this is an example of a Westminster waste vehicle travelling through Lambeth residential streets.</p>	<p>roads are closed and have to be approved by the Contract Manager at Veolia.</p> <p>Private waste operators routes are not known.</p> <p>The volumes vary every year depending how much we collect.</p> <p>Rule of thumb:</p> <ul style="list-style-type: none"> <li>• Residual waste, SELCHP: approx. 145-150kt/a</li> <li>• Dry mixed recycling, IWMF: approx. 8kt/a directly delivered and approx. 15kt/a bulk hauled</li> <li>• Bulky waste &amp; WEEE, IWMF: approx. 3kt/a</li> </ul> <p>[6 maps were attached to the email showing the following routes:</p> <ul style="list-style-type: none"> <li>• Westminster Bridge to SELCHP</li> <li>• Waterloo Bridge to SELCHP</li> <li>• Vauxhall Bridge to SELCHP</li> <li>• Lambeth Bridge to SELCHP</li> <li>• Chelsea Bridge to SELCHP</li> <li>• Blackfriars Bridge to SELCHP] </li></ul>
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<p>Waste-related traffic movements</p>	<p><b>Lambeth follow-up email sent 22<sup>nd</sup> May 2019</b></p> <ol style="list-style-type: none"> <li>1. For the Western Riverside Waste Authority boroughs, including Lambeth, Veolia use Smugglers' Wharf in Wandsworth: residual waste travels by river to Belvedere in LB Bexley. Has this option for a more sustainable mode of transport been considered for Westminster's residual waste? We also note the City's residual waste travels to Belvedere by river from Wallbrook Wharf – has this route been considered for Westminster and if not could it be? Could transport by river via routes such as these be part of the next specification for Westminster's waste contract?</li> <li>2. Turning to the current routes, we note those shown only relate to residual waste travelling to SELCHP. Please could you advise where is IWMF (the destination for recyclate) and how the waste travels there? Does it pass through Lambeth and if yes by which routes?</li> <li>3. Please could you provide further information about the specification of the vehicles used by Veolia under your current contract? Does WCC's contract with Veolia require they use the latest, safest and cleanest vehicles available?</li> <li>4. Are alternative routes defined in advance of disruptions to the planned routes? If not, can they be such that they never use unclassified roads?</li> </ol> <p>Air quality, road safety and mitigation of climate change are significant priorities for Lambeth and London as a whole, and they are important cross-border strategic planning issues. Lambeth Council wishes to ensure every opportunity is taken to improve these issues in the borough. We would therefore like to continue to work with WCC to find ways to reduce the impacts of Westminster waste movements through Lambeth.</p>	<p><b>23rd October Westminster email reply</b></p> <ol style="list-style-type: none"> <li>1. Western Riverside Waste Authority (WRWA) disposes of waste on behalf of Lambeth. Lambeth is only a collection authority. Waste trucked from Lambeth goes to WRWA's own riverside waste transfer stations – City has its own wharves as well. They use contractors who are able to barge to Belvedere from their wharves. Barges from these waste transfer stations can only access the Belvedere facility and no other Energy Recovery Facilities.</li> </ol> <p>WCC does not have its own waste wharves and as unitary authority has responsibility for both waste collection and disposal and as such needs to procure contracts to provide both services. Therefore, it uses Veolia and its facilities at SELCHP for which there is no wharf.</p> <ol style="list-style-type: none"> <li>2. Recyclate is also trucked along the same route to Southwark's IWMF which is adjacent to SELCHP.</li> <li>3. Our fleet exceeds ULEZ compliance due to the Eminox filter retrofitting project. We are also introducing electric trucks, already 25% of the total fleet is electric. The electricity used to charge the vehicles is generated directly from our own waste at SELCHP. It is important to note the pollutants emitted by tugs since they use heavy fuel oils which form an air pollution blanket over the Thames.</li> <li>4. If the route over Lambeth Bridge is blocked, access across the river will be via bridges in Westminster.</li> </ol>
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## Hopkins, Kimberley: WCC

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**From:** Catherine Carpenter <CCarpenter@lambeth.gov.uk>  
**Sent:** 12 November 2019 09:04  
**To:** Hopkins, Kimberley: WCC  
**Cc:** Rob Bristow; Robert East  
**Subject:** Statement of Common Ground - Lambeth and Westminster  
**Attachments:** Westminster Lambeth SCG 121119.pdf

Dear Kimberley,

I can confirm that Lambeth's Cabinet Member for Planning Investment and New Homes has given in principle agreement to the attached Statement of Common Ground between Lambeth and Westminster, prior to considering it for formal agreement in December 2019.

Kind regards,

Catherine Carpenter BA MA MRTPI  
Head of Policy and Place-shaping  
Planning, Transport and Development  
Sustainable Growth and Opportunity  
London Borough of Lambeth

T: 020 7926 1251  
M: 07785 660143

[www.lambeth.gov.uk/planning](http://www.lambeth.gov.uk/planning)

Postal address: London Borough of Lambeth, Planning Transport & Development, PO Box 734, Winchester, S023 5DG

Address for delivery in person or by courier: London Borough of Lambeth, Civic Centre 3<sup>rd</sup> floor  
6 Brixton Hill, London SW2 1EG

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