

Statement of Common Ground between London Borough of Lambeth and the City of London Corporation

May 2024



Introduction

- 1.1 This Statement of Common Ground (SCG) has been prepared to demonstrate how the London Borough of Lambeth (LBL) and the City of London Corporation have facilitated effective joint working on cross-boundary strategic planning matters, in accordance with the requirements of the National Planning Policy Framework (NPPF). It focusses on areas of agreement or disagreement between LBL and the City of London Corporation on strategic cross-boundary matters.
- 1.2 The purpose of the SCG is to document the strategic cross-boundary matters being addressed and progress in cooperating to address them. Updates to this document will be agreed at key stages of plan-making. It therefore includes details on mechanisms for review and updating.
- 1.3 This SCG would replace the existing agreement signed in December 2019 between the two parties prepared in support of LBL's Local Plan and the City of London's draft Local Plan (City Plan 2036). This has now been updated to reflect Lambeth's emerging Site Allocations DPD (SADPD) and the City Corporation's City Plan 2040. These existing arrangements are considered appropriate and proportionate for dealing with any potential strategic and cross-border issues that may arise and will continue to remain in place unless otherwise agreed.

Strategic Geography & Local Policy Context

- 1.4 This section sets out the factual position regarding cross-boundary strategic matters. The location and administrative boundaries of each borough are shown on Figure 1 and Figure 2 below.



Figure 1: Locations of City of London and LB of Lambeth within Central London

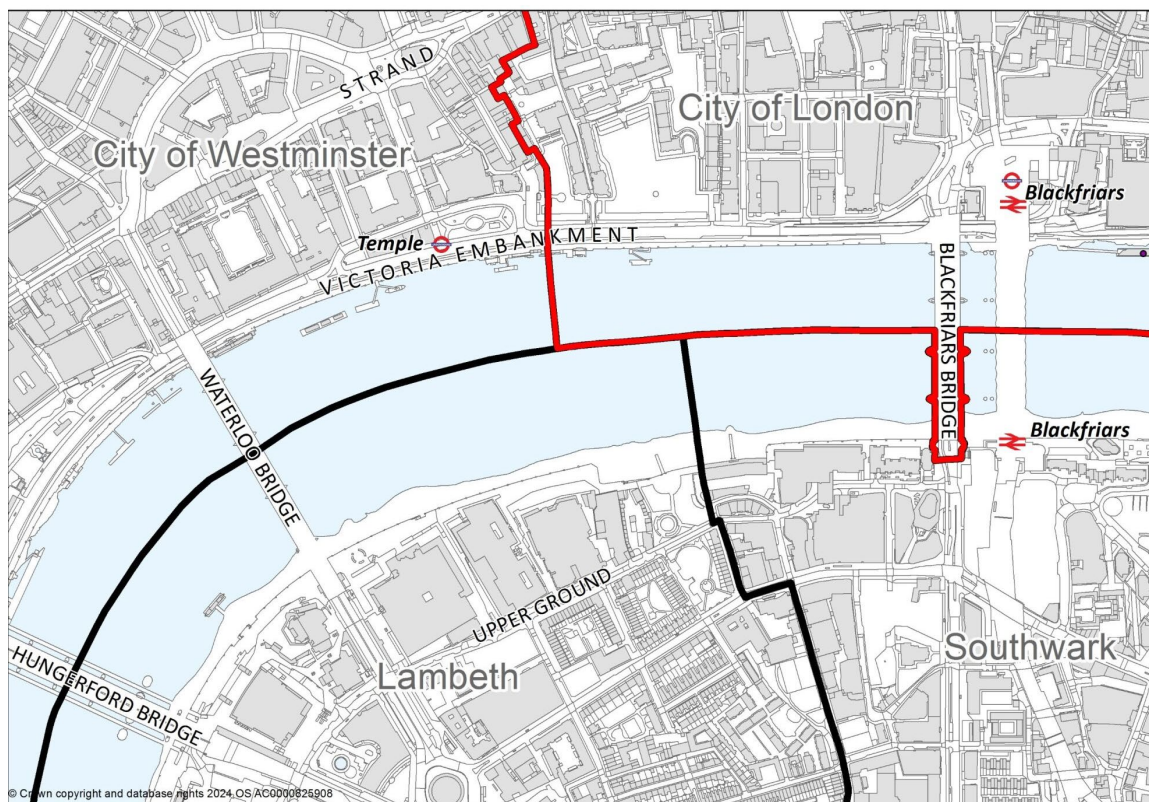


Figure 2: Border between City of London and LB of Lambeth

Local Planning Authority:

- 1.5 The City of London Corporation and the LBL have had a constructive dialogue on cross boundary planning matters for many years, discussing a broad range of planning issues including strategic matters. Several meetings have been held since 2019 which are set out in Appendix 1 which have informed the development of emerging and adopted plans and other related documents. Liaison has also been conducted through pan-London groups such as London Councils, the Association of London Borough Planning Officers (ALBPO) and liaising with the Mayor of London.
- 1.6 The City of London and LBL do not share a land border but sit on opposite sides of the River Thames with a small notional border. This SCG includes the whole of the LBL and City of London's Square Mile.
- 1.7 The City of London lies to the north of the River Thames and covers an area just over one square mile. It is surrounded by seven other London Boroughs - City of Westminster, London Borough (LB) Camden, LB Islington, LB Hackney, LB Tower Hamlets, LB Southwark, and LBL.
- 1.8 The LBL 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.
- 1.9 The City of London, also known as the Square Mile, is a world leading financial and professional services centre and a strategically important office cluster at the heart of the Central Activities Zone (CAZ). The City is home to around 21,000 businesses and its resident population of about 8,500 people is significantly smaller than its daytime working population of approximately 615,000. The City is situated on the north bank of the River Thames and is the ancient core of London with a rich legacy of history. It contains St Paul's Cathedral, the Monument, the Bank of England and many other well-known landmarks; it adjoins the Tower of London and houses arts and cultural facilities of international renown, including the Barbican Centre.
- 1.10 The LBL is among the most densely populated areas in the country, with over 11,300 people per square kilometre. The number of households in the borough is projected to grow from 143,655 in 2016 to 172,649 in 2036 (Lambeth SHMA). Lambeth is an important part of London's economy; the north of Lambeth is an integral part of London's CAZ, home to significant employers and cultural and tourism assets, including London's most significant agglomeration of cultural facilities at the South Bank.

London Plan:

- 1.11 The London Plan is the spatial development strategy for London, produced by the Greater London Authority (GLA) on behalf of the Mayor of London. Every London borough's Local Plan must be in general conformity with the London Plan. Together, the policies in the London Plan in addition to each borough's Local Plan constitute the statutory local

development plan for that borough, along with any ‘made’ neighbourhood development plans. 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 addressed through the London Plan and the current version of this was published in March 2021.

Key Strategic Matters

- 1.12 The key strategic issues are set out below in regard to ongoing plan making, although it is noted that there are other issues that may have cross boundary impacts. Both the City of London and LBL are committed to further dialogue moving forward, and not just those limited to periods of plan preparation.

Employment, retail, leisure and commercial development:

- 1.13 There are no shared town centres but both the City of London and LBL are both within the CAZ (See Figure 3).

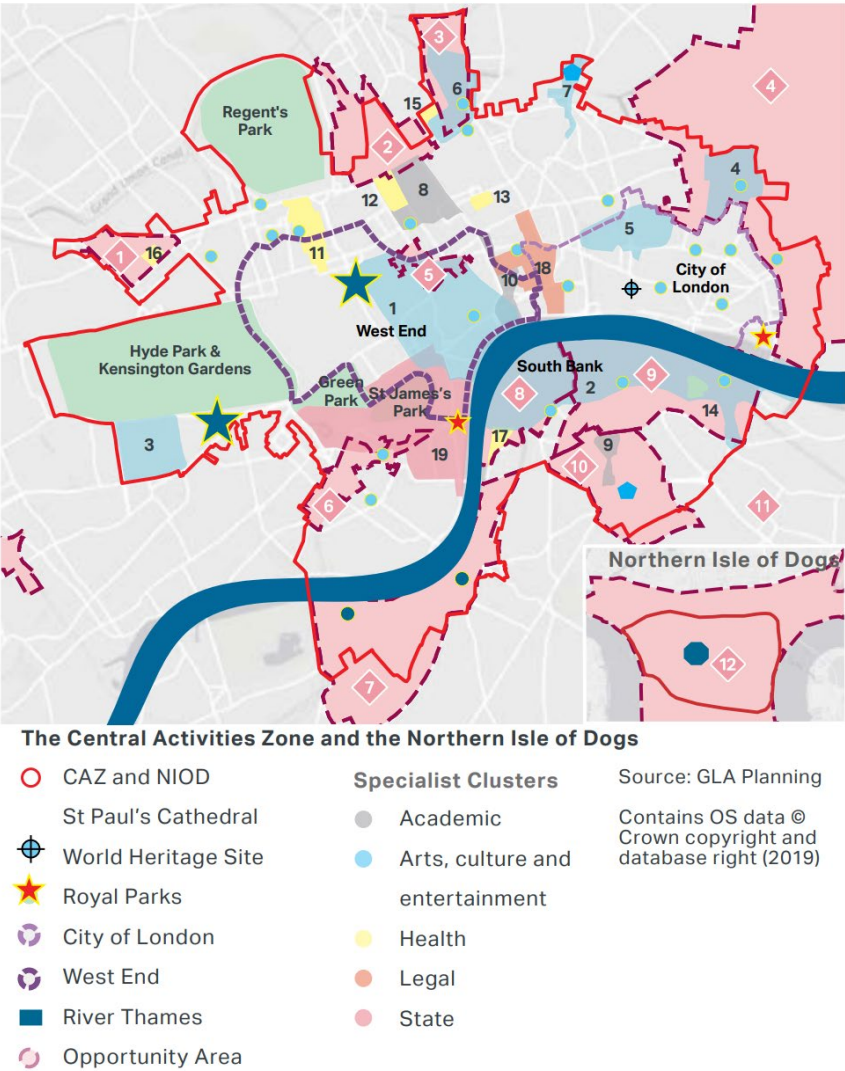


Figure 3: The CAZ and the Northern Isle of Dogs (Source - Figure 2.16 – CAZ Diagram in the London Plan)

- 1.14 In regard to employment the whole of the City of London and the area of LBL closest to the City (Waterloo) lies within the CAZ. The CAZ is a London Plan designation set out in Policy SD4. 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.
- 1.15 The City of London Corporation plays a key role in the CAZ, containing nationally and internationally significant office functions. Policy E1 of the London Plan identifies the unique agglomerations and dynamic clusters of world city businesses and other specialist functions of the central London office market, including the CAZ. The London Plan supports local authorities in protecting strategic office locations, such as the CAZ, including through the use of Article 4 directions. The City of London Corporation has Article 4 directions to ensure that areas are not undermined by office to residential permitted development rights. The City Plan seeks to provide a minimum of 1.2 million sqm of additional office floorspace up to 2040, to accommodate an increase of 66,000 jobs.
- 1.16 The Lambeth Local Plan 2021 seek to promote and enhance the international, national and London-wide roles of the CAZ in South Bank, Waterloo and Vauxhall. Waterloo is home to a resident population of approximately 10,000 people and the London Plan identifies remaining potential for an additional 1,500 homes and 6,000 jobs between 2019 and 2041. The Waterloo Masterplan was published in March 2024, the document promotes a long-term vision for the evolution of the station and surrounding area. Lambeth has also introduced Article 4 Directions which restrict permitted development rights for changes of use from Class E uses, in order to protect the role of town centres.

Neighbourhood Planning:

- 1.17 There are no designated neighbourhood planning areas spanning the borough boundary between the two parties. The area south of the River Thames is within the South Bank and Waterloo Neighbourhood Plan.

Housing:

- 1.18 London is considered as a single housing market area, with a series of complex and interlinked sub-markets. The Mayor has carried out a London-wide Strategic Housing Market Assessment (SHMA) and Strategic Housing Land Availability Assessment (SHLAA). The SHMA has identified a need for 66,000 additional homes per year.
- 1.19 The NPPF sets out a standardised approach to assessing housing need and requires strategic planning authorities to follow this approach in setting housing targets in Local Plans.
- 1.20 The London Plan sets a housing target for the City and the London boroughs. The City Corporation's target is 146 additional residential units per annum up to 2028/29. The target for the plan period is 1,706 units.
- 1.21 The Lambeth Local Plan housing target is 1,335 additional new dwellings per year from 2019/20 to 2028/29. This target for the plan period is 13,350 net additional dwellings.

- 1.22 Both parties **agree** that they will aim to meet or exceed the total numerical housing target assigned to them by the Mayor of London in the London Plan, within the confines of their own administrative boundary.
- 1.23 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.
- 1.24 The City of London manages 126 flats on the William Blake Estate in LBL, which provides affordable housing for City of London tenants. The City of London also manages the City of London Almshouses (44 flats) and the Gresham Almshouses (8 flats) in the LBL
- 1.25 Both parties **agree** to work collaboratively on any additional development or redevelopment of these properties and estates to deliver new affordable housing for City and LBL residents.

Gypsies and Travellers:

- 1.26 The London Plan states that, in the absence of an up-to-date local gypsy and traveller needs assessment, boroughs should use the need figure set out in Table 4.4 of the London Plan.
- 1.27 The City of London has a need for zero pitches and is not planning to make provision.
- 1.28 LBL has a need for three pitches for gypsies and travellers over the Local Plan period which equates to one pitch every five years. There is no identified need for plots for travelling showpeople in the borough. LBL 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 the identified future need.
- 1.29 Both parties **agree** that on this basis neither borough currently has unmet need for gypsy and travellers' accommodation

The provision of energy (including heat):

- 1.30 The London heat map is an online tool, developed by the Mayor, used to find opportunities for decentralised energy (DE) projects in London. The Mayor has identified Heat Network Priority Areas, which can be found on the London Heat Map website. These identify where in London the heat density is sufficient for heat networks to provide a competitive solution for supplying heat to buildings and consumers. No existing or proposed heat networks cross the borough boundary between the two parties.
- 1.31 Sub-regional Local Area Energy Plans (LAEPs) are being developed across London to facilitate cross-boundary local energy planning and action, led by the Mayor of London. The City is part of the Central, Inner East and North (CIEN) sub-region and these sub-regional priorities are likely to include heating and cooling networks and electricity grid capacity / resilience. Heat zoning regulations being developed by the UK Government are intended to provide the basis for the commercialisation and expansion of heat networks in central

London. The City of London Corporation is participating in the UK Government's Advanced Zoning Programme (AZP) and is contributing to the way the regulations could be applied in the City.

Waste management:

- 1.32 Each Waste Planning Authority is expected to plan for their identified waste needs, including planning to meet London Plan apportionment targets.
- 1.33 LBL 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. LBL 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.
- 1.34 The City of London works collaboratively with the South East London Joint Waste Planning Group (SELJWPG) to meet its London Plan Waste Apportionment in full. This group consists of the City of London, LB of Bexley, LB of Bromley, LB of Greenwich, LB of Lewisham and LB of Southwark. The City of London Local Plan promotes a Circular Economy approach to waste.
- 1.35 Lambeth lies within the 'Western Riverside' area of London and is one of four authorities that make up the Western Riverside Waste Authority (WRWA) responsible for disposal of household waste. The group comprises LB Hammersmith & Fulham, RB Kensington and Chelsea, LBL and LB Wandsworth.
- 1.36 There are no significant waste movements between LBL and the City of London.
- 1.37 Both parties acknowledge that there are no implications for either party as a result of each other's proposed position on waste.

Tall Buildings:

- 1.38 The London Plan Policy D9 (Tall Buildings) requires Development Plans to define what is considered to be a tall building and determine if there are locations where tall buildings may be an appropriate form of development, identifying locations and appropriate tall building heights. The draft City Plan 2040 sets out a comprehensive approach to managing tall building proposals in the Square Mile.
- 1.39 Tall buildings in the City are defined as those exceeding 75m AOD in height. The draft City Plan Policy S12 identifies locations (City Cluster and Fleet Valley) and heights for tall buildings areas in the City where tall building development will be considered appropriate. This policy has been informed by detailed heritage impact assessments and strategic visual impact assessment, considering how the proposed massing of tall buildings in these areas could potentially impact the strategic landmarks and the wider City and pan-London skyline.

- 1.40 Tall buildings in LBL are defined in Local Plan Policy Q26 as being over 25m in the south of the borough (below the south circular road), and as being above 45m in the middle and northern part of the borough. The Policy was developed using high level visual impact analysis, taking into account heritage asset settings, strategic and local views and, where relevant, existing guidance on cluster formation and rudimentary 3D modelling.
- 1.41 The SADPD Proposed Submission Version (PSV) identifies three locations as being appropriate for tall buildings. These are Site 1 (Royal Street), Site 7 (6-12 Kennington Lane) and Site 18 (300-346 Norwood Road). None of these sites are in the vicinity of the City of London.
- 1.42 Particular consideration was given to Site Allocation 9 (Gabriel's Wharf and Princes Wharf) during Duty to Cooperate meetings. While this proposed site allocation is not identified as being appropriate for a tall building, LBL provided visualisations of the indicative model in context using VuCity, to consider any potential impact the site allocation may have on the settings of heritage assets located in the City of London, and also on Strategic View 'Linear View 8 - Westminster Pier to St Paul's Cathedral', as set out in the London Plan and associated guidance (London View Management Framework). Through these ongoing discussions officers from the City of London confirmed they had no concerns regarding the indicative height and massing for Site Allocation 9.

Strategic and Local Views:

- 1.43 The London Plan currently protects strategic views of a number of significant heritage assets in central London through the London Views Management Framework (LVMF). It is important both LBL and City of London work collaboratively with one another and the GLA and other London Boroughs on these views.
- 1.44 The Strategic views which cross the borough boundary between the two parties are:
- Protected Vista Westminster Pier to St Paul's Cathedral
 - Protected Vista King Henry's Mound to St Paul's Cathedral
- 1.45 Local views from LBL into the City of London:
- Brixton (Panorama i)
 - Norwood Park (Panorama ii)
 - National Theatre (Panorama viii)
 - Queen Elizabeth Hall (Panorama ix)
 - Knight's Hill (Landmark Silhouette ii)
 - Gipsy Hill (Panorama iii)
 - Queen's Walk (Landmark Silhouette xvi)
- 1.46 There are no local views from the City of London into LBL.
- 1.47 Within the City of London draft Local Plan, areas appropriate for tall buildings have been identified and the plan includes a St Paul's Heights code, which has been in place since the 1930s.
- 1.48 St Paul's Heights Code viewpoints along South Bank and southern ends of Hungerford and Waterloo Bridge.

- 1.49 LBL SADPD will form part of the development plan for the borough, alongside the Lambeth Local Plan, the South Bank & Waterloo Neighbourhood Plan, and the London Plan 2021. It will add site-specific policies to existing development plan policy. The SADPD includes policies for thirteen sites, distributed across the borough (See Figure 4). As stated above (para 1.43), particular consideration was given to Site Allocation 9 (Gabriel's Wharf and Princes Wharf) during Duty to Cooperate meetings, with particular regard given to any potential impact the site allocation may have when viewed from the City of London. The City of London have no objections to these proposals as they are unlikely to create any strategic cross-border impacts within the City of London.
- 1.50 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. LBL agrees to protect views of St Paul's Cathedral, under the St Paul's Heights code, from identified viewpoints on the South Bank and the southern ends of Waterloo and Hungerford Bridges.

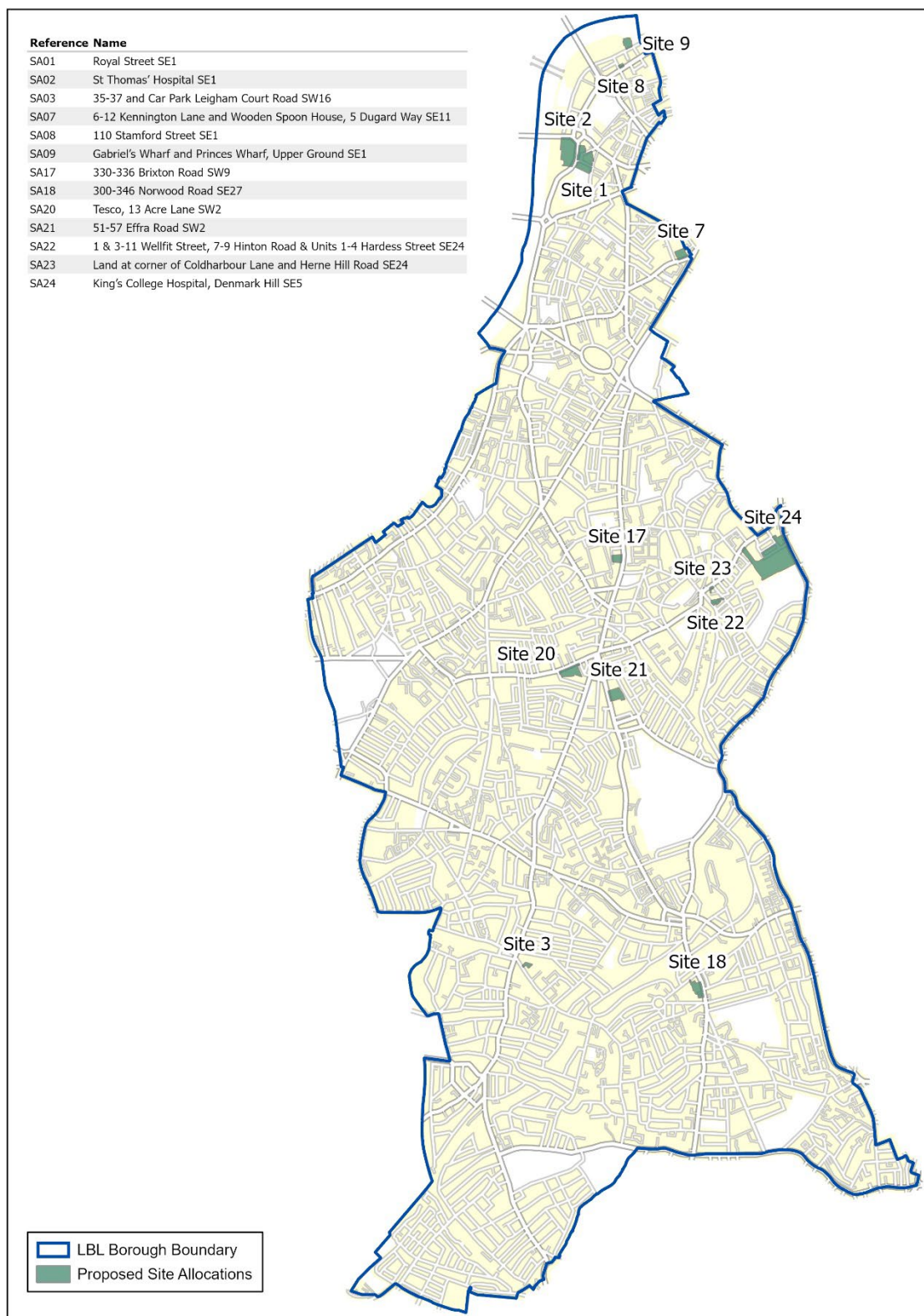


Figure 4: Draft Site Allocations (LB of Lambeth)

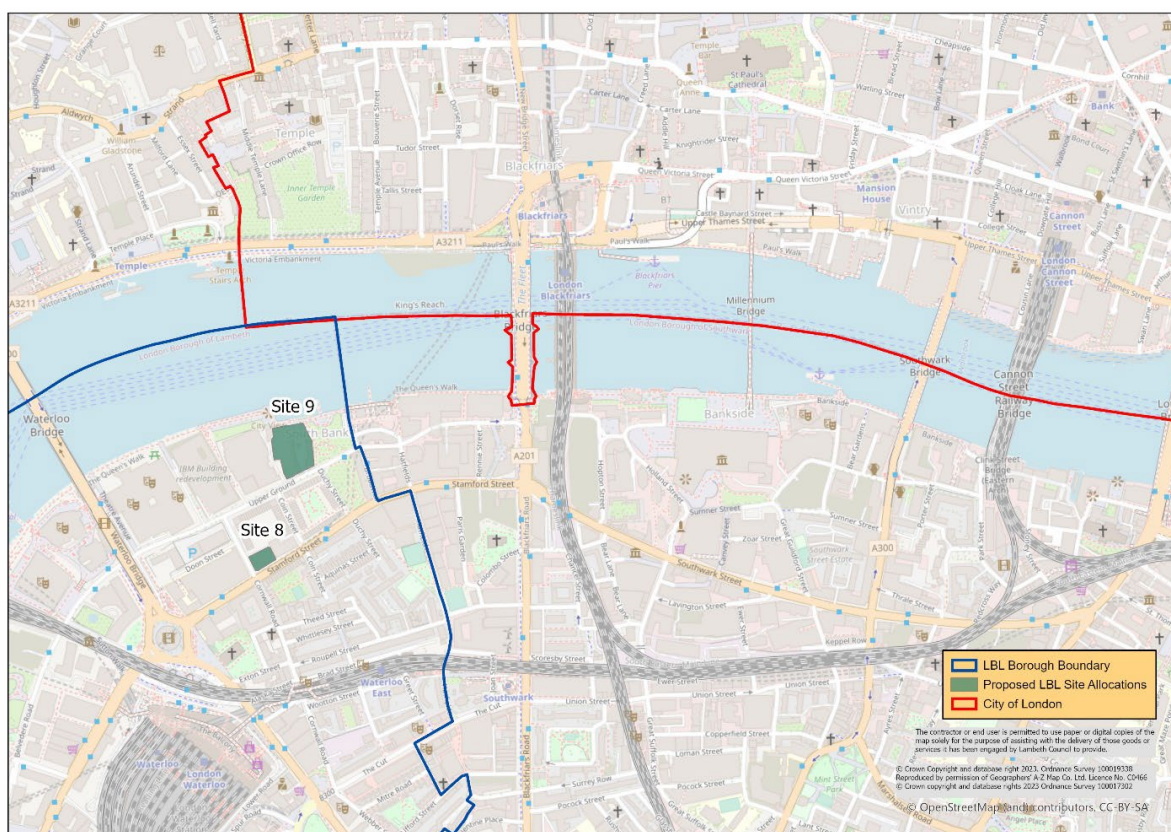


Figure 5: Proximity of Draft Site Allocations between City of London and LB of Lambeth

Heritage, design and conservation:

1.51 The conservation areas which cross the borough boundary between the two parties are set out below and we agree to work collaboratively on this:

- South Bank Conservation Area
- Temples Conservation Area

Cultural Infrastructure:

1.52 The Southbank/Bankside/London Bridge area is designated in the London Plan as a strategic cluster of cultural attractions. This area set out in Figure 3. The CAZ crosses the borough boundary between LBL and LB of Southwark and lies adjacent to the boundary with the City of London. As set out in the London Plan, boroughs should identify these and other strategic clusters of cultural attractions in their Local Plans. The City of London have published a Cultural Planning Framework which sets out cultural provision in the City.

1.53 Destination City, the City Corporation's flagship strategy, recognises the crucial role that culture and visitors will play in creating a more vibrant Square Mile that is a welcoming destination for everyone. The draft City Plan Policy S6 (Culture and Visitors) seeks the development of a wide range of cultural, leisure and recreational facilities across the City. It provides links to the Culture Planning Framework, which is currently under development, and which will set out a framework for how new development can support the cultural life of different parts of the Square Mile, informed by extensive research.

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

River Thames

Policy Approach:

- 1.55 The Thames Policy Area is a special policy area set out in the London Plan and to be defined by boroughs in which detailed appraisals of the riverside will be required. Collaboration with riparian neighbouring boroughs, the Environment Agency, the Marine Management Organisation, the Port of London Authority and the Mayor of London is essential to ensure that the strategies and plans for the river are realised.
- 1.56 The River Thames provides a major asset that LBL and the City of London border. Both authorities recognise the importance of this setting and have complementary policy approaches to shape future development within the area designated through the London Plan as the Thames Policy Area.
- 1.57 The City of London Riverside Strategy (2021) provides guidance for the management of the river flood defences in the Square Mile, including the approach to raising the flood defences over the coming century whilst also providing benefits to the workers, residents and visitors that use the Thames river frontage.
- 1.58 The Thames Vision produced by the Port of London Authority, sets a framework for greater use of the River Thames between now and 2050 including targets for increased passenger and freight movements.

River Services:

- 1.59 Both parties **agree** to work collaboratively to improve both passenger transport on the River and use of the River for freight movements and implement policies affecting the London Plan Thames Policy Area.

Site of Importance for Nature Conservation:

- 1.60 Both parties are separated by the River Thames and therefore no green infrastructure crosses the borough boundary between the two parties. However, the River Thames and Tidal Tributaries Metropolitan SINIC crosses the border
- 1.61 Both parties **agree** to consult each other on any proposals that could impact on the River Thames and Tidal Tributaries Metropolitan SINIC.

Sustainability:

- 1.62 The City of London Climate Action Strategy provides evidence for the trajectory to a net zero carbon City by 2040. The City of London will ensure it is environmentally sustainable and transitions to a net zero carbon, taking a 'retrofit first' approach to development.

- 1.63 LBL 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.
- 1.64 LB Lambeth also published a Climate Action Plan (CAP) in 2022, in collaboration with major institutions, businesses and residents. The CAP sets out a vision and twenty goals for the borough to become net zero compatible and climate resilient by 2030.
- 1.65 Many of the sections set out in this SCG relating to transport, waste, flood risk, provision of energy and air quality are all relevant to mitigating and adapting to climate change.
- 1.66 Both authorities agree to follow the approach outlined in the London Plan for zero carbon developments (Policy SI2) and support the principle of the Mayor's urban greening and Biodiversity Net Gain (BNG) objectives.

Retrofit First:

- 1.67 Both the City Corporation and LBL acknowledge the need to prioritise the retrofit and refurbishment of existing buildings to meet the changing needs of occupiers and reduce the impact of development on climate change. Both policy approaches are for retrofit first, not retrofit only.
- 1.68 The City Corporation has developed supplementary planning guidance, including Carbon Options Guidance and a draft Sustainability SPD. The supplementary guidance outlines the methodology for undertaking a whole life-cycle carbon assessment. LBL is supportive of the approach taken by the City of London Corporation.

Flood Risk:

- 1.69 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 properties in LBL and in the City which would otherwise be at risk of tidal and fluvial flooding. The Thames tidal defences also include tidal walls and embankments along the banks of the River Thames. Should they fail or become breached, the areas most at risk of flooding would be in the north of Lambeth and an area of the City within 200m of the Thames, but this could also impact on the surrounding neighbourhoods. The Environment Agency holds tidal breach modelling. This is also detailed within Lambeth's Strategic Flood Risk Assessment (SFRA) Tidal Breach addendum and the City of London's SFRA.
- 1.70 The Environment Agency's Thames Estuary 2100 Plan sets out the measures that require implementing to maintain adequate flood risk protection from the River Thames by the year 2100. The Plan identifies LBL and the City of London 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. The Plan was updated in May 2023 which brought forward the first raising in the City of London from 2065 to 2050, which can be up to 0.5m and a further 0.5m by 2090.

- 1.71 No Critical Drainage Areas span the borough boundary between the two parties. 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.
- 1.72 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.
- 1.73 Each local authority is statutorily required to produce a Local Flood Risk Management Strategy (LFRMS) for their respective borough which details how they assess and will manage local flood risk within their administrative boundary. LFRMSs require cross boundary partnership working to achieve the ultimate outcome of reducing local flood risk.
- 1.74 The City of London have quarterly Flood Group meetings with London boroughs in the North Central section, but the LBL do not form part of this group. As part of the partnership working, Lambeth's and the City's Flood Risk Officers meet at quarterly Flood Group meetings.
- 1.75 The City of London attend the London North Central Thames Catchment Flood Risk Partnership and the LBL attend the London South Central Thames Catchment Flood Risk Partnership. These partnership groups assist in collaborative working and provide a platform for sharing knowledge and common issues in flood risk management.
- 1.76 Both parties **agree** to have regard to each other's flood risk policies and evidence.

Governance Arrangements

- 1.77 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 engagement between the parties in Appendix 1.
- 1.78 This SCG is a live document and will be reviewed and updated when either party reaches a critical stage in plan-preparation and will form a key part of implementation of Local Plan policies and reviews. The SCG will be informed by continued communication between the parties through meetings, statutory consultation at key plan making stages and electronic communication.
- 1.79 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

- 1.80 LBL adopted its Local Plan in September 2021 and the key dates for the review of this document are set out in Table 1 below.

1.81 The City of London's current Local Plan was adopted in 2015. Preparation of a new local plan, called City Plan 2040 is currently in progress. It is anticipated that this will be submitted for examination in Summer 2024. Once adopted, the new Plan will replace the Local Plan 2015. The key dates for this review are set out below.

Local authority	Present plan adoption	Date of Review	Reg. 18 date	Anticipated Reg. 19 date (Revised Reg19 date for City)	Anticipated submission date
LB of Lambeth Local Plan	September 2021	2024/24	2025/26	2026/27	2027/28
LB of Lambeth SADPD	N/A	2021	January 2022	Spring 2024	Summer 2024
City of London Local Plan	January 2015	2016	November 2018	Spring 2024	Summer 2024

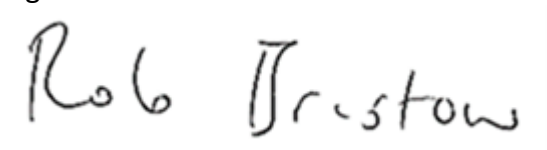
Table 1: Plan review, update and submission dates produced by City of London and LB of Lambeth

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

Signatories

- 1.83 Both parties agree that this statement is an accurate representation of matters discussed and schedule of issues agreed upon set out in Appendix 1.
- 1.84 It is agreed that these discussions will inform both LBL's SADPD and the draft City Plan 2040 and both parties will continue to work collaboratively in order to meet the duty to cooperate.
- 1.85 For the City of London, the SCG is signed by the Head of Policy & Strategy with political oversight from the Chair and Deputy of the Planning & Transportation Committee.
- 1.86 For LBL, the SCG is signed by the Director of Climate Change, Planning & Transport.

Signed:

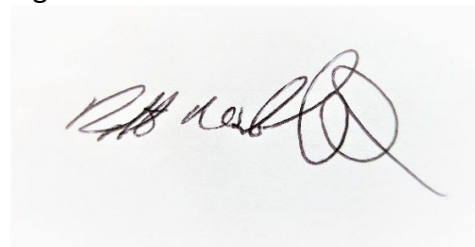


Name: Rob Bristow

Position: Director of Climate Change,
Planning & Transport

London Borough of Lambeth

Signed:



Name: Rob McNicol

Position: Assistant Director of Policy &
Strategy

City of London

Appendix 1 - Schedule of engagement between the parties

- 1.87 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 to discuss emerging Local Plans, Lambeth's SADPD and wide range of strategic matters:
- In May 2021, Lambeth submitted representations to the Regulation 19 consultation on the City Plan 2036. Lambeth's representation suggested Policy S13 should take account of views into the City that have been designated by other Local Planning Authorities.
 - On 19 November 2021, officers from Lambeth met with their counterparts at the City of London to discuss the SADPD.
 - On 25 November 2022, officers from Lambeth met with their counterparts at the City of London to discuss the SADPD. Lambeth officers provided a presentation outlining the proposals including the nearest sites. No issues were identified, and it was agreed that Lambeth would lead on this SCG.

- On 22 May 2023, officers from Lambeth met with their counterparts at the City of London to discuss the SADPD. Lambeth officers discussed the evolution of the modelling and the refinements they intended to make following Regulation 18 consultation to the draft SADPD and the accompanying evidence base documents. The City of London provided an update on the draft City Plan 2040. The structure and content of this SCG was also discussed.
- On 24 October 2023, officers met to discuss the City of London's Local Plan review and various evidence base documents that had been produced to support this. Lambeth also provided an update of its SADPD, covering the changes in its proposed submission version.
- On 19 December 2023, officers met to discuss the indicative massing and building heights for Site Allocation 9 – Gabriel's Wharf and Princes Wharf, considering the impact of the site allocation on any relevant heritage assets and protected views. No concerns were raised by the City of London on these matters.
- The City of London is consulting on its 'City Plan 2040' under Regulation 19 between 18 April - 31 May 2024. Lambeth is intending to submit a response confirming the plan has been prepared in accordance with the Duty to Cooperate. Lambeth considers the plan to be sound, with no outstanding matters remaining.