

Statement of Common Ground between
London Borough of Lambeth, London
Borough of Bromley and London Borough
of Croydon

December 2019

1. Executive summary

This Statement of Common Ground (SCG) 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). This SCG focuses on strategic cross-boundary matters being addressed and progress in cooperating to address them.

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

Lambeth's AMRs also provide further details of how the DRLLP PSV have been informed by ongoing engagement with key partners, including those that are not party to this Statement of Common Ground.

Upper Norwood/Crystal Palace district centre is part in Lambeth, Bromley and Croydon. For this reason this locality was identified as having strategic cross-boundary matters that need to be addressed and progressed in cooperation. The current position on these ongoing discussions is reflected in this three-way statement of common ground (SCG).

2. Parties involved

- London Borough of Lambeth
- London Borough of Bromley
- London Borough of Croydon

The Bromley Local Plan was adopted in January 2019.

The Croydon Local Plan was adopted in February 2018. Croydon is reviewing its adopted Local Plan. The Issues and Options consultation, which is based around three spatial strategies, sites and planning policies necessary to meet these needs runs from 8 November 2019 until 13 January 2020.

Please note that this Statement addresses cross boundary matters between Lambeth, Bromley and Croydon in respect of:

- (i) the shared town centre boundary at Upper Norwood/Crystal Palace
- (ii) Strategic Outer London Development Centres
- (iii) transport
- (iv) air quality
- (v) green infrastructure

There are separate Statements between Lambeth and Bromley and Lambeth and Croydon which address all other strategic cross boundary matters.

Further detail regarding co-operation between Bromley and Croydon in respect of other cross border matters and areas is, or will be, set out in the:

- *The London Borough of Bromley Submission Local Plan 2017 Statement of Compliance with the Duty to Co-operate set out the co-operation on cross borough matters in the development of the Local Plan.*
- LB Croydon Authority Monitoring Reports and a Duty to Cooperate Statement submission document at the regulation 19 stage of the Local Plan review in November 2020.

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 adopted London Plan (2016) 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. All parties have effectively co-operated with the

¹ Also known as the London Economic Action Partnership

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. It is situated mainly between the boroughs of Wandsworth and Southwark and covers an area of approximately ten and a half square miles. Lambeth 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 Bromley

Bromley is an outer London borough, situated in south east London. It is surrounded by Croydon, to the west, and Lewisham, Greenwich and Bexley to the north. It has a short border with Lambeth which it bounds at its North West, to the south eastern point of Lambeth.

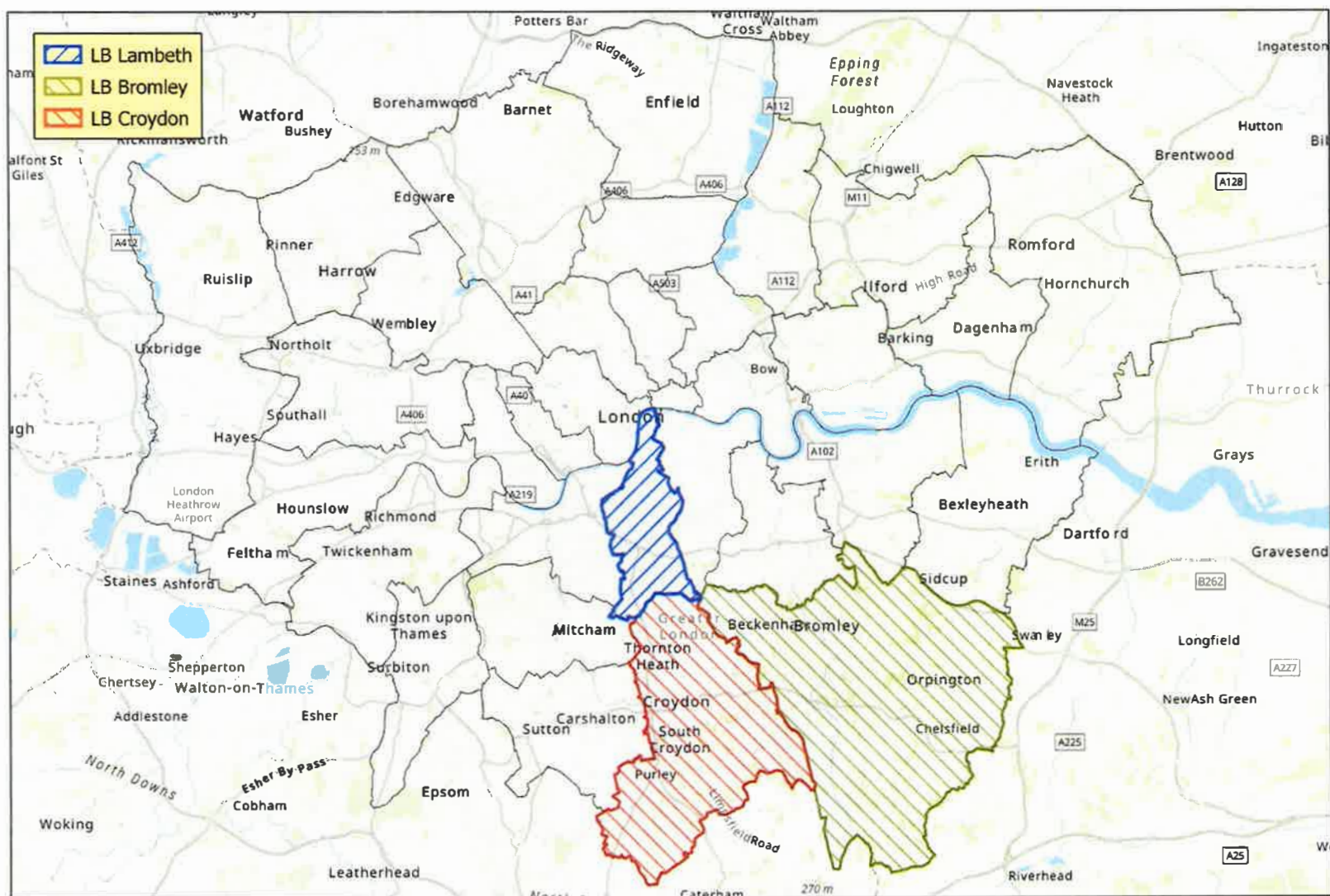
LB Croydon

Croydon is an outer London borough, situated in south London. It bounds Lambeth to the south. It is bordered by Bromley to the east, and Sutton and Merton to the west. The land border between Croydon and Lambeth is approximately 4 kilometres.

Upper Norwood/Crystal Palace

Upper Norwood/Crystal Palace district centre spans the borough boundary between each of the three parties. This is perhaps the most important cross border issue for Lambeth with both Bromley and Croydon. Accordingly, as the border of the district centre spans part of Lambeth, Bromley and Croydon, each party has agreed to enter into a three-way statement of common ground (SCG).

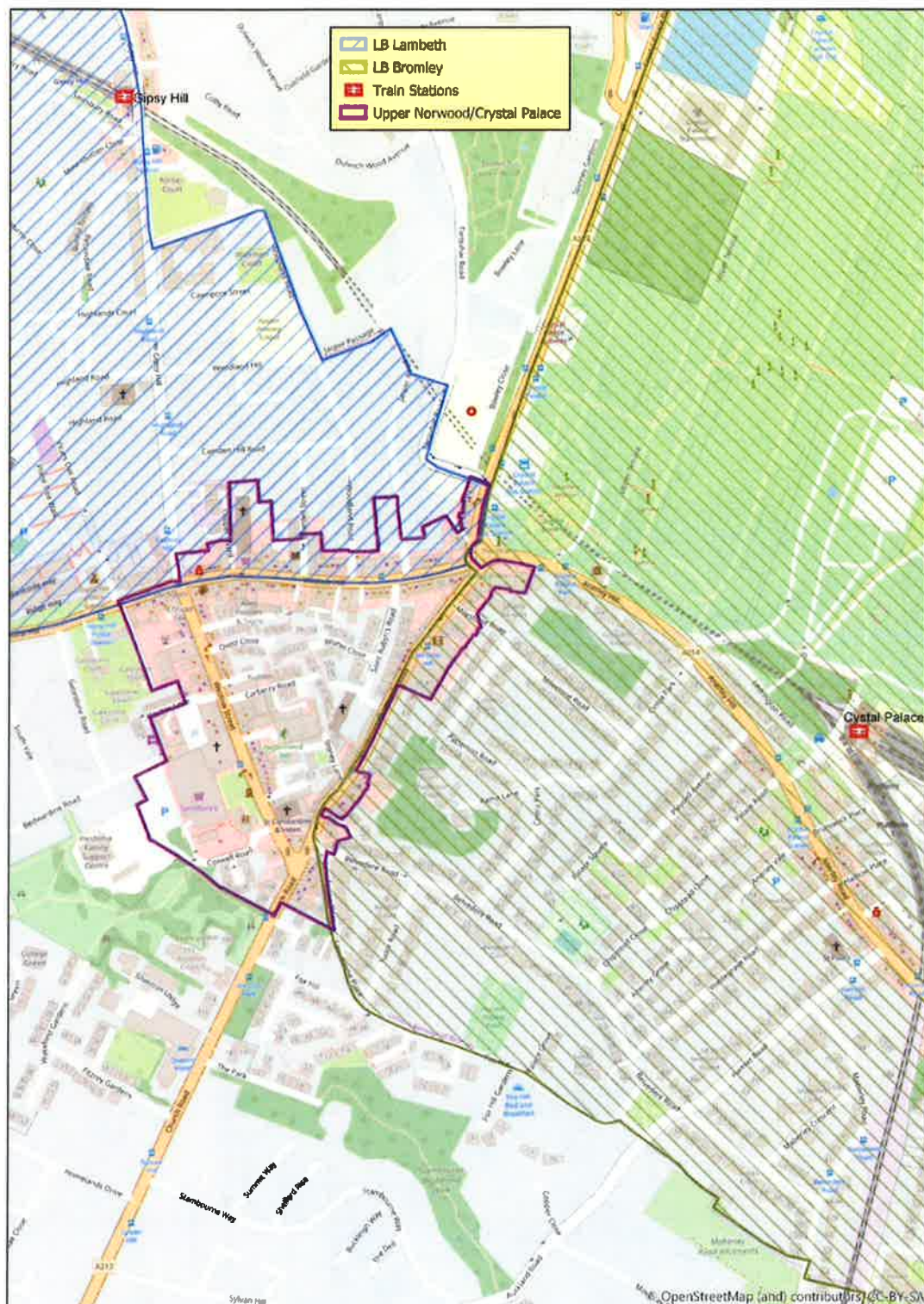
Map 1 – Boroughs involved in this Statement



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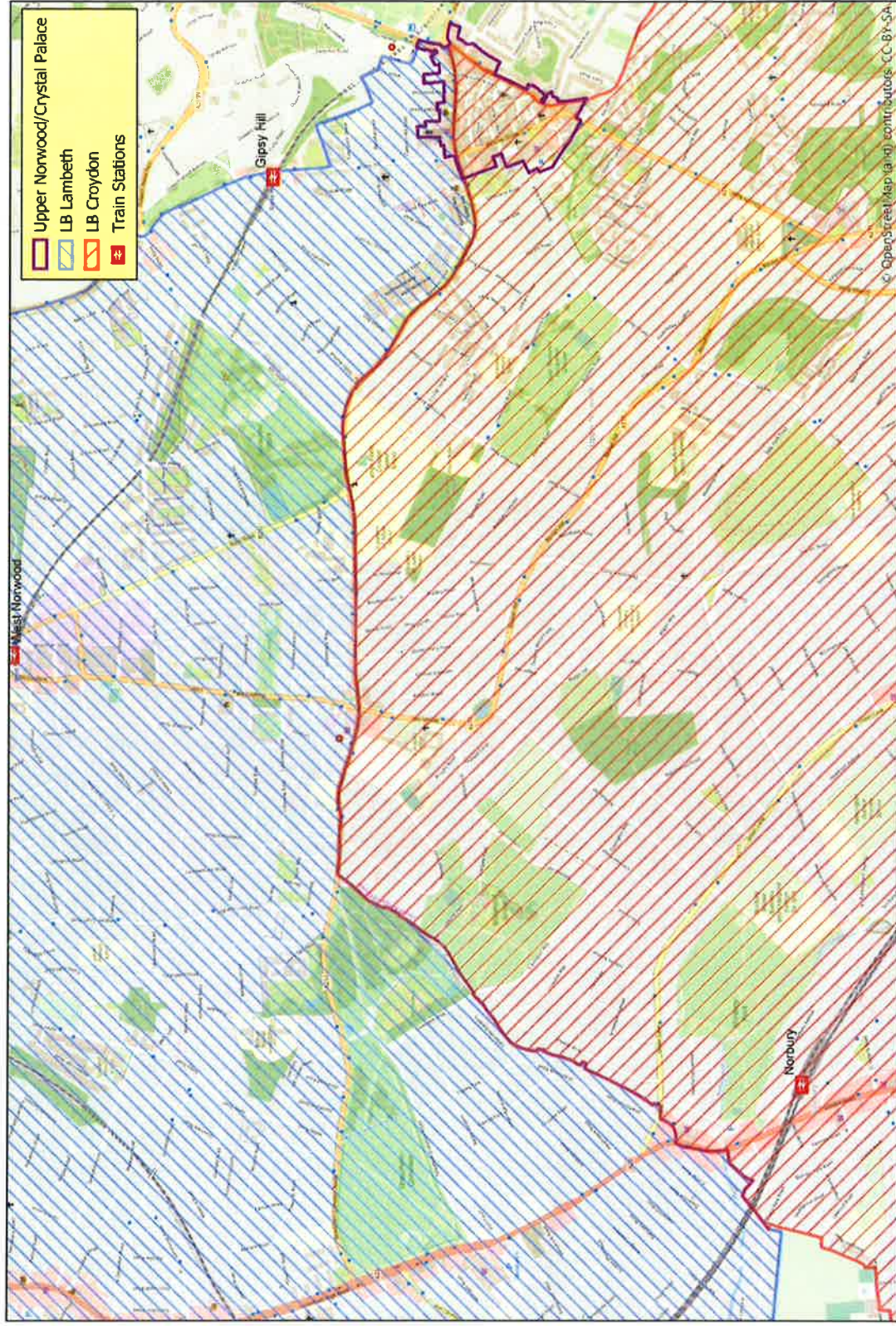
Map 2 – Length of border between Lambeth and Bromley and key policy designations



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Map 3 – Length of border between Lambeth and Croydon and key policy designations



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Employment, retail, leisure and commercial development

Shared town centres

Town centres that cross the borough boundary between each of the parties:

- Upper Norwood/Crystal Palace district centre

Strategic Outer London Development Centres

SOLDCs are economic locations of various scales with specialist functions/strengths which already function or can potentially function at a more than subregional level and generate significant, specialist growth considerably above existing Outer London.

Strategic Outer London Development Centre that lies in close proximity to the borough boundary between each of the parties:

- Crystal Palace Park

Transport

Main roads that cross the border between Lambeth and Bromley:

- The A212 (Crystal Palace Parade) is a London distributor road

Main roads that cross the border between Lambeth and Croydon:

- The A23 (Streatham High Road) is part of the TfL Road Network
- The A214 (Gypsy Hill) is a London distributor road
- The A215 (Knight's Hill) is a London distributor road

Rail lines that cross the boundary between Lambeth and Bromley:

- Gypsy Hill to Crystal Palace

Mainline stations on or in close proximity to the boundary between Lambeth and Bromley:

- Gipsy Hill Station (Lambeth)
- Crystal Palace Station (Bromley)

Rail lines that cross the boundary between Lambeth and Bromley:

- Norbury to Streatham Common

Mainline stations on or in close proximity to the boundary between Lambeth and Croydon:

- Gipsy Hill Station (Lambeth)
- Norbury Station (Croydon)

Air quality

Air Quality Focus Areas spanning the borough boundary between the Lambeth and Bromley:

- None

Air Quality Focus Areas spanning the borough boundary between the Lambeth and Croydon:

- None

Green infrastructure

Green infrastructure in Lambeth adjoining Bromley:

- There are no designated Lambeth SINC or MOL close to or spanning the borough boundary the borough boundary.

Green infrastructure in Bromley adjoining Lambeth:

- The Crystal Palace Park

Listed parks:

- Crystal Palace Park is entirely within the borough of Bromley but lies in close proximity to the Lambeth borough boundary. It is designated Metropolitan Open Land and grade II listed park (heritage asset).

The Crystal Palace Park is also designated MOL in Bromley SINC adjacent to the borough boundary with Lambeth. Much of the park is also designated as a Site of Interest for Nature Conservation.

Green infrastructure in Lambeth adjoining Croydon, for the purposes of this agreement:

- Norwood Park SINC

Green infrastructure in Croydon adjoining Lambeth, for the purposes of this agreement:

- None

Heritage, design and conservation

Crystal Palace Park is entirely within the borough of Bromley but borders Lambeth and Croydon. It is designated Metropolitan Open Land and grade II listed park (heritage asset)

4. Strategic matters:

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

4.1 Employment, retail, leisure and other commercial development

Shared town centres

- All parties **agree** to work collaboratively to ensure that their respective policy approaches to Upper Norwood/Crystal Palace district town centre have regard to each other's policy approaches.
- All parties **agree** to work collaboratively and share monitoring information and analysis of the health of Upper Norwood/Crystal Palace

Strategic Outer London Development Centre

In response to London Plan (2016) Policy 2.16 Bromley has designated Crystal Palace Park as a Strategic Outer London Development Centre for leisure/tourism/arts/culture/sports, in the Bromley Local Plan 2019 (Policy 111).

- Lambeth has referred to and supports the designation of Crystal Palace Park as a Strategic Outer London Development Centre in the Draft Revised Local Plan

4.2 Transport

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

All of Lambeth transport objectives are set out in the Lambeth Transport Strategy 2019.

- All parties agree to work collaboratively to deliver the Mayor's Transport Strategy outcomes with regards to walking and cycling
- All parties **agree** to take a co-ordinated approach when possible to traffic management and the public realm in Upper Norwood/Crystal Palace town centre, including in relation to public safety and security
- All parties **agree** to consult each other about proposed changes to parking controls where these may have a cross-border impact
- All parties **agree** to promote and support the development and implementation of improvements to local rail services as part of the Mayor's 'metroisation' plan. Bromley's LIP 3 states that "The Council will seek to work with TfL to understand the scope and potential of 'metroisation', mini radial networks,"
- All parties **agree** to ensure a co-ordinated approach to freight consolidation.
- All parties **agree** to ensure a co-ordinated approach to bus corridors and bus priority measures.

- Bromley **agrees** to consult Lambeth and Croydon on future proposals for Crystal Palace Park and the wider area including any transport impacts
- Croydon and Lambeth **agree** to take a co-ordinated approach to the implementation of a 20mph zone in locations not already covered by this requirement.
- Croydon and Lambeth **agree** to work collaboratively to improve public transport along the A23 corridor between Brixton and Croydon.

4.3 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.

Bromley has an Air Quality Management Area covering the North and North West of the Borough. It published its Air Quality Action Plan in 2010, follows the London Plan (2016) policy approach to air quality in relation to new development and has recently adopted local Policy 120 'Air Quality' in the Bromley Local Plan (2019).

The whole of Croydon has been declared an Air Quality Management Area since 2003 and the latest draft Air Quality Action plan 2017-2022 presents 50 actions to address this issue. There are five 'air quality focus areas of which the London Road, Norbury area informs how poor air quality can be tackled in the Upper Norwood/Crystal Palace locality.

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

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

Crystal Palace Park adjoins the cross border boundary between Lambeth and Bromley on the Bromley side. It also lies in close proximity to the Croydon borough boundary. All parties **agree** that this space is a shared resource.

- Bromley **agrees** to consult Lambeth and Croydon on any Crystal Palace Park proposals close to the borough boundary.

Sites of Importance for Nature Conservation (SINC's)

- All parties **agree** to consult each other on any proposals that could impact on SINC's in one of the neighbouring borough.

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	Spring 2020
Bromley	January 2019	N/A	N/A	N/A	N/A
Croydon	February 2018	February 2019	8 November 2019 – 13 January 2020	November 2020	February 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

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

Signed: Matthew Bennett

Name: Cllr Matthew Bennett

Position: Cabinet Member for Planning, Investment & New Homes

London Borough of Lambeth

Date 08/01/2020

Signed: Alexa Michael

Name: Cllr Alexa Michael

Position: Development Control Committee Chairman

London Borough of Bromley

Date 2nd December 2019

Signed: Steve Dennington

Name: Steve Dennington

Position: Head of Spatial Planning

London Borough of Croydon

Date 02/12/2019

Appendix 1 - Schedule of engagement between the parties

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

- 29th October 2019

Air quality meetings:

Project	Partner
London Councils work into new AQ legislation	London Councils (lead), various other boroughs
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, Wandsworth, and Westminster.
Air Quality Monitoring Network	King's College London
Breathe London Project	GLA (lead), University of Cambridge, King's College London, AirMonitors, CERC, Environmental Defence Fund, Google Earth Outreach, National Physical Laboratory, C40 Cities.
airTEXT service	Islington Council (Current lead), University of Cambridge, London boroughs, GLA, Chelmsford, Colchester, Slough, Three Rivers, Thurrock, Environment Agency, Public Health England, CERC, European Commission, DEFRA, PREVAIR and European Space Agency
STARS programme	TfL
Pollution alerts to schools, GP surgeries and care homes	GLA, King's College London
Ultra Low Emission Zone	GLA
Statutory duties as Air Quality Management Area	GLA, Defra

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

Organisation	Participating authorities	Frequency
APRIL Network (Air Pollution Research in London)	All boroughs, GLA, TfL, research institutions	Quarterly

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

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:

Lambeth

On 9th October 2017, Lambeth notified Bromley and Croydon 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 both parties to make representations. No representations were received from either Bromley or Croydon.

On 22nd October 2018, Lambeth notified Bromley and Croydon 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 both parties to make representations.

Schedule of representations received from Bromley in the DRLLP regulation 18 consultation

On 21st December 2018, LB Bromley submitted comments on the Draft Revised Lambeth Local Plan 2018. The table below outlines the points made by Bromley, relevant to this Statement, and the proposed Lambeth response.

Representation Wording	Plan Section	Policy/Sites/ General/ Policies Map/Issue	Officer Response	Proposed Change in DRLLP PSV
<p>The London Borough of Bromley is committed to engaging positively with its neighbours not only to satisfy the requirements of the “Duty to Cooperate” but also to ensure that any potential adverse impacts on its own communities are highlighted and investigated. We support the broad objectives of the Draft Revised Local Plan.</p> <p>We look forward to engaging with you further in relation to cross-boundary strategic matters in the future</p>	General	Duty to Cooperate	Noted.	No change.
<p>Bromley recommends that the Draft Revised Local Plan refers to and supports the proposed designation of Crystal Palace Park as a Strategic Outer London Development Centre, given its geographical location serving residents in Lambeth and several other neighbouring boroughs and in recognition of the cross-borough engagement to date in respect of regeneration of the park.</p>	Section 11	PN11	Agreed	Policy PN11 Upper Norwood/Crystal Palace will include a reference to the Strategic Outer London Development Centre status of Crystal Palace Park.
<p>Bromley notes the acceptance of the Draft London Plan’s parking standards, which presents a step change to those included in the current London Plan, in the context of which Bromley’s Draft Local Plan has been prepared.</p>	Section 08	T07	Noted	No change

Schedule of representations received from Croydon in the DRLLP regulation 18 consultation

On 17th December 2018, LB Croydon submitted comments on the Draft Revised Lambeth Local Plan 2018. The table below outlines the points made by Croydon, relevant to this Statement, and the proposed Lambeth response.

Representation Wording	Plan Section	Policy/Sites/General/ Policies Map/Issue	Officer Response	Proposed Change in DRLLP PSV
<p>Thank you for inviting the London Borough of Croydon (LBC) to comment on the draft Revised Lambeth Local Plan (DRLLP). In addition to these comments we confirm that there have been helpful and ongoing discussions to meet the requirements of the duty to cooperate through the preparation of our Local Plans.</p> <p>The Croydon Local Plan (CLP18) adopted February 2018 sets out a strategy to ensure Croydon continues to be an attractive and thriving place for all who live, work and visit. Once the new London Plan is adopted the Croydon Local Plan 2018 will be reviewed. There is an up to date program to reflect this in the Local Development Scheme (LDS)</p>	General	Duty to Cooperate	Noted.	No change.
<p>Transport issues are similar for our boroughs and the DRLLP, like the CLP18, introduces changes that seek to achieve sustainable forms of transport. The detailed policies reflect the sustainable location of Lambeth as an inner London borough and are therefore supported. As with all London authorities Croydon and Lambeth are producing Transport Plans setting out how local authorities will deliver the London Mayors Transport Strategy, which will inform the delivery of the required transport infrastructure to support the development proposed in the Local Plans. Detailed discussions about transport infrastructure will continue through this process.</p>	Section 08	General	Noted.	No change.