

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

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). It focusses on areas of agreement or disagreement between Lambeth and Merton 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.

Lambeth's AMRs also provide further details of how the DRLLP PSV 2020 plans have been informed by ongoing engagement with key partners, including those that are not party to this Statement of Common Ground.

2. Parties involved

- London Borough of Lambeth
- London Borough of Merton

3. Strategic geography

This section sets out the factual position regarding cross-boundary strategic matters.

The London Plan

The London Plan is the spatial development strategy for London, produced by the Greater London Authority on behalf of the Mayor of London. Every London borough local plan must be in general conformity with the London Plan. Together, the policies in the London Plan and in each borough's Local Plan constitute the statutory local development plan for that borough, along with any neighbourhood development plans once made.

It is worth noting that in a London context, collaboration on many strategic issues that go beyond borough boundaries (e.g. distribution of housing targets, identification of major areas of growth etc.) are largely addressed through the London Plan.

The London Plan is currently subject to a review and the Draft London Plan is undergoing examination at the time of writing. It is expected the replacement London Plan will be published (adopted) in early 2020.

Transport for London

Transport for London (TfL) is the integrated transport authority responsible for implementing the Mayor's Transport Strategy, which covers three key elements - healthy streets and healthy people, a good public transport experience and new homes and new jobs. The boroughs are required to work with TfL to support implementation of the Mayor's Transport Strategy.

TfL runs the day-to-day operation of the capital's public transport network (London Buses, London Underground, London Overground, Docklands Light Railway, TfL Rail and London Trams). Network Rail own, operate and develop London's railway infrastructure.

TfL also manages London's main roads (the Transport for London Road Network or TLRN). The London boroughs are responsible for all the other roads within their boundaries (other than the national motorway network, which is managed by Highways England).

The London Enterprise Panel

The London Enterprise Panel¹ (LEP) is the local enterprise partnership for London and is governed by the Mayor of London. It is the body through which the Mayor of London works with boroughs, business and TfL to take a strategic view of the regeneration, employment and skills agenda for London. Boroughs have historically engaged with the Mayor of London / GLA rather than directly with the LEP on relevant strategic planning matters. Both parties have effectively co-operated with the GLA regarding the development of its evidence base particularly in relation to business needs and likely changes in the market.

All London Green Grid

The 'All London Green Grid partnership' is recognised by DEFRA as the Local Nature Partnership for London. The partnership does not yet have a governance structure that allows it to respond on matters of local plan consultations.

Thames Water

Thames Water is the statutory water and sewerage undertaker for the area and is hence a "specific consultation body" in accordance with the Town & Country Planning (Local Development) Regulations 2012. From the 1st April 2018 all network reinforcement work required to support development will be delivered by Thames Water and funded through the Infrastructure Charge applied to each property connected to the water and wastewater networks. The Infrastructure Charge will also cover all modelling and design work required to deliver any necessary upgrades. The planning system will still play a key role in assisting that development does not outpace the delivery of any necessary infrastructure provision.

It will be essential that all development is aligned with any necessary water and sewerage infrastructure upgrades required to avoid any adverse impacts such as sewer flooding, pollution of land or watercourses and impacts of low/no water pressure. In line with DRLLP policy EN4, Thames Water will, where appropriate, request phasing conditions are used to ensure that any new development or phase of development is not occupied until any necessary upgrades have been completed.

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.

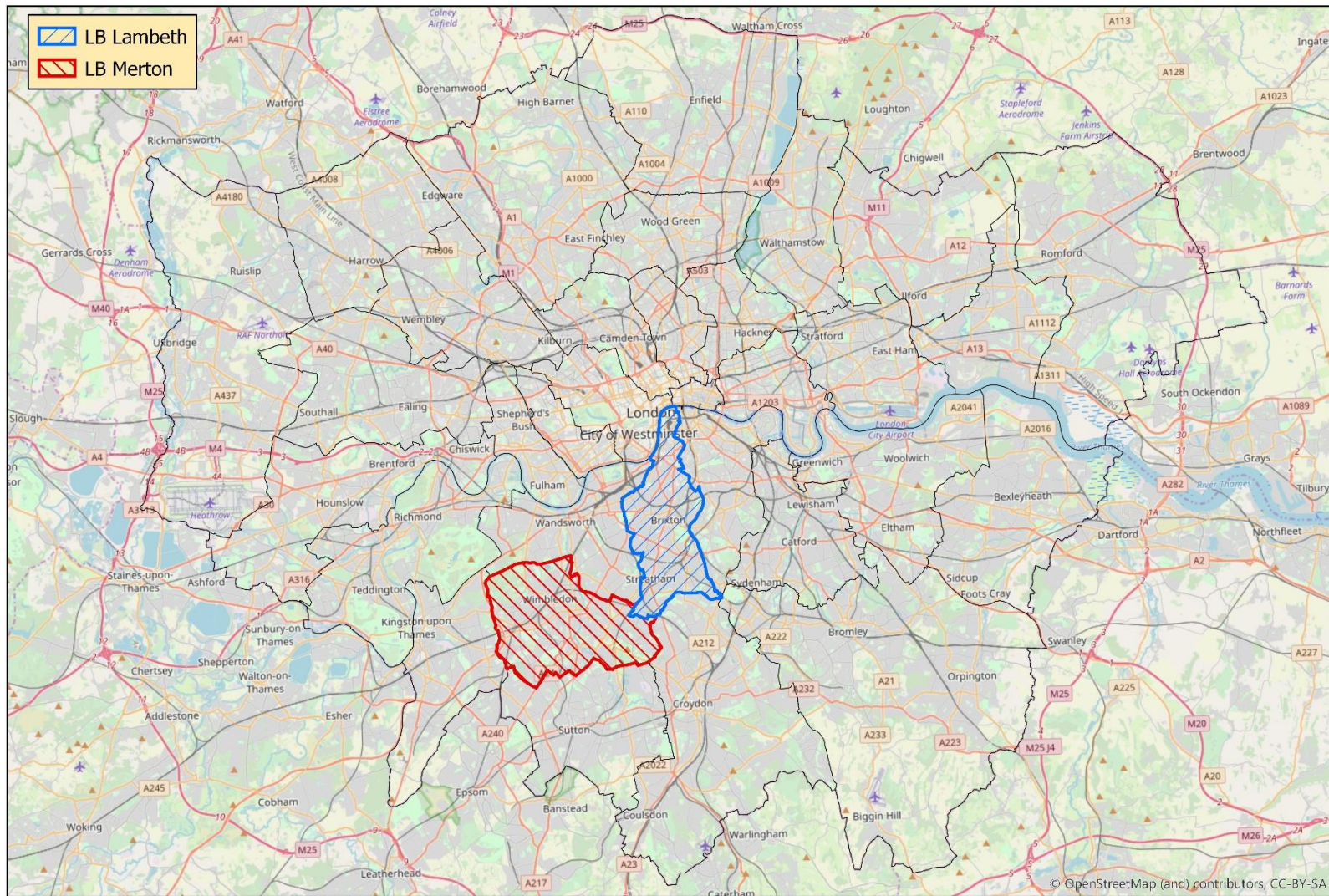
¹ Also known as the London Economic Action Partnership

LB Merton

Merton is an outer London borough, situated in south west London, in the Wandle Valley. It covers an area of approximately 14.7 square miles and is surrounded by five other London Boroughs – Wandsworth, Lambeth, Croydon, Sutton and Kingston upon Thames. Merton bounds Lambeth to the south west.

The boundary between the two boroughs is less than 3 kilometres in length. This Statement includes the whole of the LB Lambeth and the whole of LB Merton.

Map 1 – Map of authorities involved in this Statement



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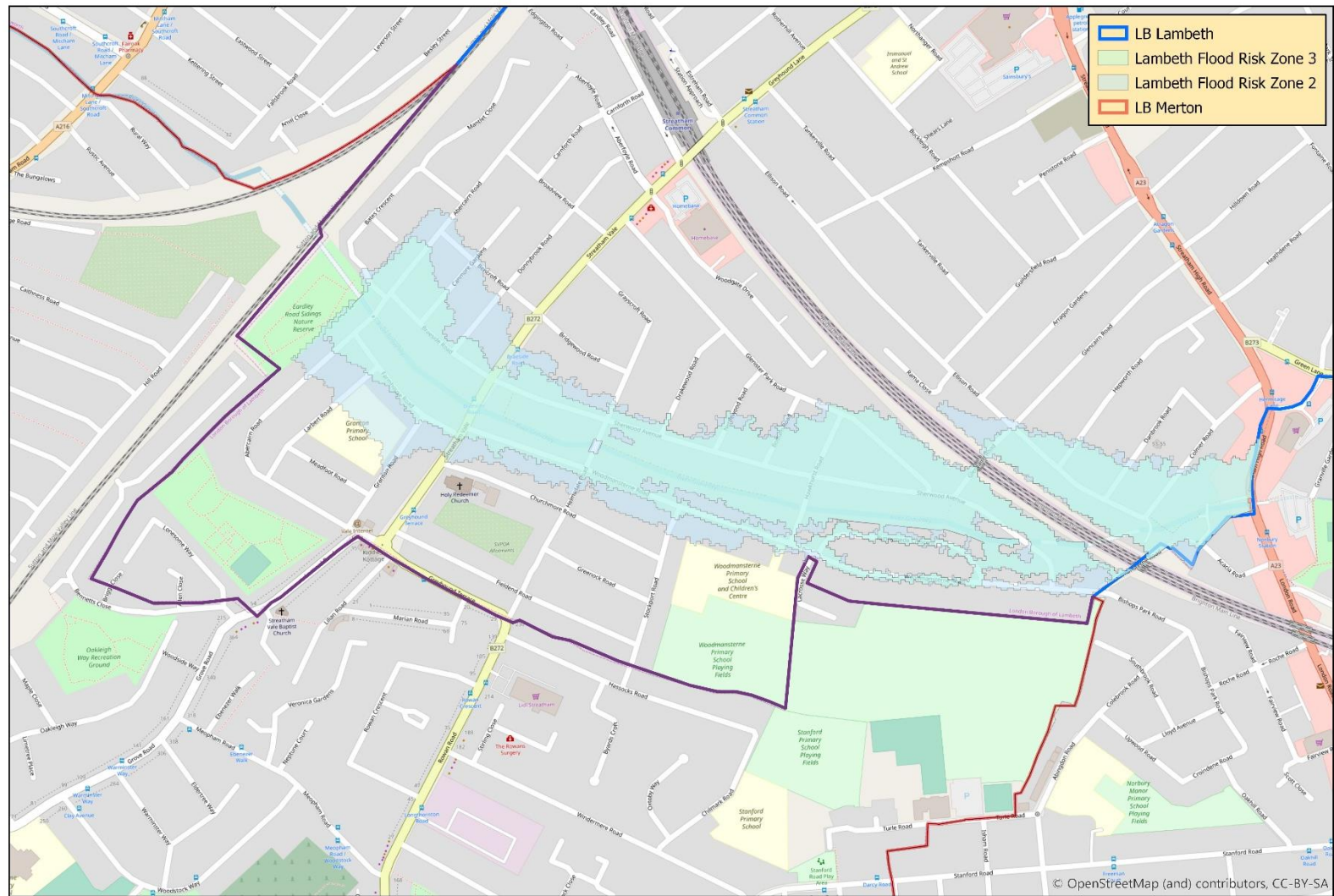
Map 2 – Border between the two parties and key policy designations



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Map 3 - River Graveney and associated flood risk zones



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Neighbourhood planning

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

Gypsy and Travellers site

The Streatham Vale Gypsy and Traveller site in Lambeth lies in close proximity to the borough boundary between the two parties.

Employment, retail, leisure and commercial development

Shared town centres:
None.

Transport

Main roads that cross the border between Lambeth and Merton:
There are no London distributor roads or roads on the TfL Road Network that cross the borough boundary between the two parties.

Rail lines that cross the borough boundary and connect the two parties:

- Streatham to Mitcham Eastfields
- Streatham to Tooting

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

- Streatham (Lambeth)
- Mitcham Eastfields (Merton)
- Tooting (Merton)

Air quality

Air Quality Focus Areas spanning the borough boundary between the two parties:
None.

Flood risk

River Graveney

The River Graveney runs through both Merton and Lambeth and spans the boundary between the two parties. The River Graveney flood risk zones also span the borough boundary between the two parties.

River Thames

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. 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, but this could also impact on the surrounding neighbourhoods. The Environment Agency holds tidal breach modelling. This is also detailed within Lambeth's SFRA Tidal Breach addendum.

Critical Drainage Areas

A Critical Drainage Area is a discrete geographic area (usually a hydrological catchment) where multiple and interlinked sources of flood risk (surface water, groundwater, sewer, main river and/or tidal) cause flooding in one or more Local Flood Risk Zones during severe weather thereby affecting people, property or local infrastructure. No Critical Drainage Areas span the borough boundary between the two parties.

The provision of energy (including heat)

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

The London Heat Map is an online tool, developed by the Mayor, used to find opportunities for decentralised energy (DE) projects in London. The Mayor has identified Heat Network Priority Areas, which can be found on the London Heat Map website (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. No existing or proposed heat networks cross the borough boundary between the two parties.

Green infrastructure

Sites of Importance for Nature Conservation (SINCs) in Lambeth adjoining the borough boundary with Merton:

- Eardley Road Sidings – Acid Grassland SINC
- Railway Lineside – Tooting Bec to Eardley Road (towards Mitcham Eastfields) SINC

Strategic and local views

Strategic views which cross the borough boundary between the two parties:
None.

Lambeth Local views into Merton:

- Streatham Common (LV 20)

- The Rookery (LV 21)

Merton Local views into Lambeth:

None

Heritage, design and conservation designations

There are no conservation areas in either Lambeth or Merton adjoining the borough boundary between the two parties.

There are no historic parks and gardens in either Lambeth or Merton adjoining the borough boundary between the two parties.

Archaeological priority areas in Lambeth adjoining Merton:

- Roman Road APA4

Archaeological priority areas in Merton adjoining Lambeth:

None

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 in the London Plan. Authorities must plan to meet or exceed their London Plan target to ensure they are in general conformity with the London Plan.

As part of attempting to meet housing need within Merton and in recognition of the difficulty Merton Council currently anticipates in being able to meet its Draft London Plan housing target, Merton has written to Lambeth to request if any of Merton's share of London's new homes could be accommodated within Lambeth's boundary. During the next 12 months Merton will be exploring housing delivery further as part of its new emerging Local Plan and will also be writing to other boroughs to request if any of Merton's housing target can be accommodated within their boundaries.

Lambeth's position in its Draft Revised Lambeth Local Plan is that it is able to meet its own Draft London Plan housing target within its administrative boundary. However, Lambeth does not have sufficient surplus capacity to assist other boroughs in meeting their unmet housing requirements. Lambeth has therefore responded to Merton's request and advised them that it is not able to assist in meeting Merton's unmet housing requirement.

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

In their current adopted Local Plan, LB Merton has a need for 2 pitches between 2014 and 2024 and is planning to meet this need within its border by utilising vacancies on its existing site in north Wimbledon. In 2019 Merton undertook an accommodation assessment of gypsy and traveller needs to inform its emerging new Local Plan. The findings of this accommodation needs assessment will feed into Merton's emerging Local Plan by mid-2020.

LB Lambeth has a need for 3 pitches for gypsies and travellers between 2019/20 and 2034/35, which equates to one pitch every five years. There is no identified need for plots for travelling 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 both boroughs can meet their identified need for gypsy and travellers accommodation within their own boundary

4.4 Health

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

Health infrastructure planning in Merton reflects the priorities of Merton's Clinical Commissioning Group. Merton's CCG, Merton Council and other providers are working together on Merton Borough Estates Group to inform Merton's health infrastructure planning.

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

4.5 Education

Both parties have school place planning teams who seek to ensure that projected levels of demand for both primary school and secondary school places are met. Each party has undertaken a school place planning exercise which has had regard to cross-border movement of pupils between the two boroughs. The findings are reflected in the Lambeth Infrastructure Delivery Plan 2019 and will be reflected in the Merton Infrastructure Delivery Plan 2020.

- Both parties acknowledge that there is likely to be cross border movements of school pupils between each borough but **agree** there are no known planning reasons why these movements cannot continue.

4.6 Telecommunications

- Both parties **agree** to work collaboratively on the delivery of digital connectivity infrastructure where there are cross-border implications

4.7 Security

- Both parties **agree** to work collaboratively on counter terrorism measures such as hostile vehicle mitigation.

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 take a co-ordinated approach when possible to traffic management at cross border level.
- Both boroughs **agree** to consult each other about proposed changes to parking controls where these may have a cross-border impact.
- Both parties **agree** to work collaboratively on the delivery of digital connectivity infrastructure where there are cross-border implications.
- Both parties **agree** to take a co-ordinated approach to bus corridors and bus priority measures.
- Both parties **agree** to promote and support the development and implementation of improvements to local rail services as part of the Mayor's 'metroisation' plan.

4.9 Air quality

The whole of Lambeth is an Air Quality Management Area, with Air Quality Focus Areas defined in Draft London Plan paragraph 9.1.8. Both parties have produced an Air Quality Action Plans. Both parties propose 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 1).

4.10 Waste management

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

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

Merton has a joint Development Plan Document (the South London Waste Plan) produced with the London Boroughs of Croydon and Sutton and the Royal Borough of Kingston upon Thames and adopted in 2012. It identifies the waste arisings and sets out how the four boroughs meet the London Plan apportionment targets within their borough boundaries. The four boroughs are currently revising the South London Waste Plan and published the Regulation 18 consultation on 31st October 2019 for six weeks. Evidence for the new South London Waste Plan demonstrates that the four south London boroughs will be able to continue to meet the London Plan apportionment targets by safeguarding existing waste sites.

Both parties have a separate Statement of Common Ground as part of the South London Waste Plan boroughs.

The South London Boroughs (which includes LB Merton) receive strategic amounts of construction, demolition and excavation (CD&E) waste exports from Lambeth.

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

4.11 Water supply, wastewater

- Each party **agrees** to support Thames Water's approach to planning for water and waste water infrastructure.

4.12 Flood risk

Flood risk in each borough is addressed through respective Strategic Flood Risk Assessment (SFRAs) and Local Plan policies. SFRAs assess the risk from all sources of flooding, this includes fluvial, tidal, surface water and foul water sources. The joint Strategic Flood Risk Assessment for Croydon, Sutton, Merton and Wandsworth (SFRA, 2017) identifies the main risks of fluvial flooding in the vicinity of the Norbury Brook through Thornton Heath and Norbury and through Kenley, Purley and Waddon along the Brighton Road and Godstone Road valleys and around the culverted River Wandle.

Each council is statutorily required to produce a Local Flood Risk Management Strategy (LFRMS) for their respective borough which details how they assess and will manage Local Flood Risk within their administrative boundary. LFRMSs require cross boundary partnership working to achieve the ultimate outcome of reducing Local Flood Risk. As part of the partnership working, Lambeth's and Merton'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 have had regard to each other's flood risk policies and **agree** that they are complimentary.
- Both parties **agree** to consult each other on any proposals within the flood risk zone where these may have a cross-border impacts

4.13 Provision of energy (including heat)

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

- Although no significant development is currently identified near the borders of each borough, both parties **agree** to work collaboratively where opportunities arise to connect development to heat networks that cross, or are in close proximity to, the borough boundary between the two parties.

4.14 Green infrastructure (i.e SINC and MOL)

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

4.15 Planning measures to address climate change mitigation and adaptation

Lambeth Council declared a Climate Emergency in January 2019. Lambeth has set itself a target to achieve net zero carbon for council operations by 2030. In July 2019, Lambeth published a corporate carbon reduction plan which sets out initial actions to achieve this target, to be reviewed annually to ensure Lambeth is on track. Lambeth are also developing a wider Lambeth climate change response plan, which will be published in 2020. In the next eleven months Lambeth plans to engage widely, starting with a Citizens' Assembly early next year, to raise awareness, gather evidence and seek to build consensus around Lambeth's climate change response and the resulting action plan.

Merton Council declared a Climate Emergency in July 2019, proposing targets to achieve net zero carbon for council operations by 2030 and net zero carbon across the borough by 2050. To inform the action plan on how we will meet these targets Merton is currently asking residents, workers, young people and anyone else interested what priorities and actions they think should be delivered. Merton's climate change action plan is also informed by Merton's Climate Change Working Group of volunteers from a variety of disciplines and interests. Merton's climate change action plan is due to be published in 2020.

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

- Both authorities **agree** to follow the approach outlined in the London Plan for zero carbon developments (see DLP policy SI2) and support the principle of the Mayor's urban greening objectives

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

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

4.17 Cultural infrastructure

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

Merton's adopted Local Plan recognises the importance of arts, culture, leisure and tourism and continues to support the London Plan approach of protecting and enhancing cultural infrastructure. To this end, funding has been allocated from Merton's Community Infrastructure Levy towards supporting such attractions in Merton, including the Polka Children's Theatre and Morden's new Leisure Centre.

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	Plan review date	Reg 18 date	Anticipated Reg 19 date	Anticipated submission date
Lambeth	September 2015	October 2017	October 2018	January 2020	April 2020
Merton	July 2014	2018	Autumn 2020	Spring 2021	Summer 2021

Table 1: Plan review, update and submission dates

6. Signatories

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

Signed: 

Name: Councillor Matthew Bennett

Position: Cabinet Member for Planning,
Investment & New Homes

London Borough of Lambeth

Date: 08/01/2020

Signed:



Name: Tara Butler

Position: Deputy FutureMerton manager

London Borough of Merton

Date: 10/01/2020

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:

- 21st November 2018
- 9th October 2019

Correspondence regarding Merton's proposed London Plan housing target:

- 26th December 2019 – Merton emailed Lambeth requesting the help of neighbouring and adjoining boroughs, such as Lambeth to meet Merton's housing target.

Air quality meetings:

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

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

Air quality organisations:

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

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

Flood officer meetings:

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

All London Borough planning officer meetings (Association of London Borough Planning Officers):

- 13th Jan 2016
- 21st June 2016
- 27th July 2016
- 13th October 2016
- 9th Feb 2017
- 14th March 2017
- 16th May 2017
- 16th February 2018
- 1st May 2018
- 3rd July 2018
- 18th September 2018
- 13th November 2018
- 25th January 2019
- 07th February 2019
- 12th March 2019
- 04th April 2019 (sub group meeting)
- 07th May 2019
- 05th June 2019 (sub group meeting)
- 16th July 2019
- 25th July 2019
- 17th September 2019
- 19th September 2019 (sub group meeting)
- 12th November 2019

Appendix 2 - Evidence of activities undertaken to address an issue

Local Plan consultations

On 9th October 2017, Lambeth notified Merton 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 Merton to make representations. No representations were received from Merton.

On 22nd October 2018, Lambeth notified the Merton 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 Merton to make representations. No representations were received from Merton.

Schedule of representations received from Merton in the DRLLP 2018 regulation 18 consultation

None.

Schedule of representations received from Lambeth in the Merton New Local Plan Stage 2 consultation on 23rd January 2019

Representation Wording	Merton Officer Response
We would welcome reference to the integration of proposed cycle networks with neighbouring boroughs. Please refer to Lambeth's proposed Healthy Route Network included within our Draft Transport Strategy - https://www.lambeth.gov.uk/sites/default/files/co-lambeth-transport-strategy-consultation-draft_0.pdf .	Agreed
We would welcome joint working on boundary issues, such as managing demand for parking and reducing short car journeys, particularly for education trips. We would also welcome support for investment in and restructuring of the suburban rail network in order to provide a metro style service in south London.	Agreed