Statement of Common Ground between the London Borough of Lambeth and London Borough of Croydon

December 2023

1. Introduction

This Statement of Common Ground (SCG) has been prepared to demonstrate that Lambeth's *Draft Site Allocations Development Plan Document (SADPD)* is based on effective and continuous joint working on cross-boundary strategic matters, in accordance with the requirements of Section 33 A of the Planning and Compulsory Purchase Act, and paragraphs 24–27 of the National Planning Policy Framework.

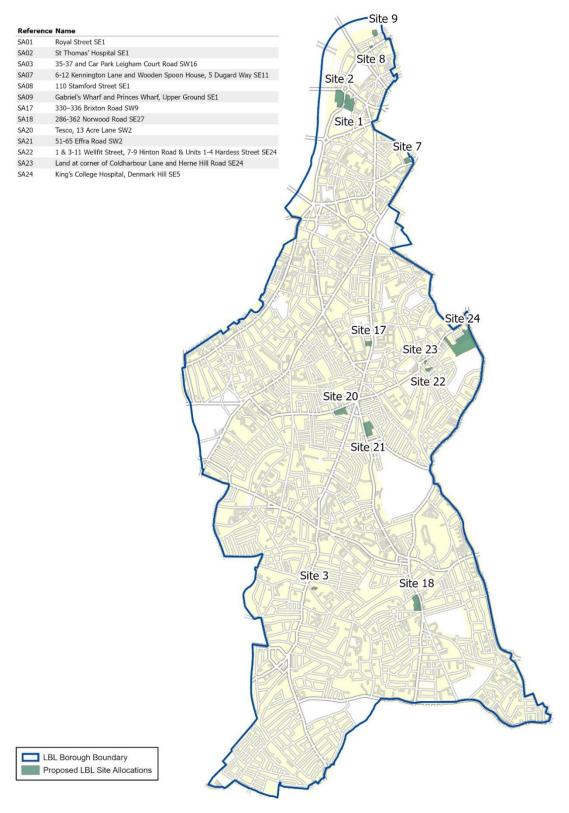
The SADPD is not a review of the existing Lambeth Local Plan 2021. Once adopted the SADPD and Lambeth Local Plan 2021 will form part of the development plan for the borough, alongside the South Bank & Waterloo Neighbourhood Plan, and the London Plan 2021.

The principal objective of the SADPD is to unlock investment through the mechanism of site-specific planning policy. It will support the implementation of wider Council strategies including the Borough Plan, Economic Resilience Strategy, Transport Strategy and Climate Action Plan. It will add site-specific policies to existing development plan policy. The Draft SADPD includes policies for thirteen sites, distributed across the borough as shown on Map 1 below.

The purpose of the SCG is to document the cross-boundary matters being addressed and progress in cooperating to address these. This SCG supplements the existing SCG agreed between the boroughs in December 2019 (included in Annexe 2). This SCG confirms that continued engagement has taken place between the two parties, and that there is agreement that Lambeth's Draft SADPD is unlikely to create any additional strategic cross-border impacts within LB Croydon though policies for thirteen sites, distributed across the borough. The two SCG are intended to be read together, with the arrangements made in the 2019 SCG continuing to have effect, alongside any future arrangements which are agreed between the two parties.

Lambeth's Authority Monitoring Reports provide further details of how the Draft SADPD has been informed by ongoing engagement with key partners, including those that are not party to this SCG.

Map 1 – Draft site allocations*



^{*}Please note, *Site 19 Knollys Yard* in West Norwood was removed from the SADPD following Reg 18 consultation.

2. Parties Involved

- London Borough of Lambeth
- London Borough of Croydon

3. Strategic Geography

This section sets out the factual position regarding cross-boundary strategic matters. The location and administrative boundaries of each borough are shown on Maps 2 and 3 below.

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 current version of the London Plan was published March 2021.

LB Lambeth

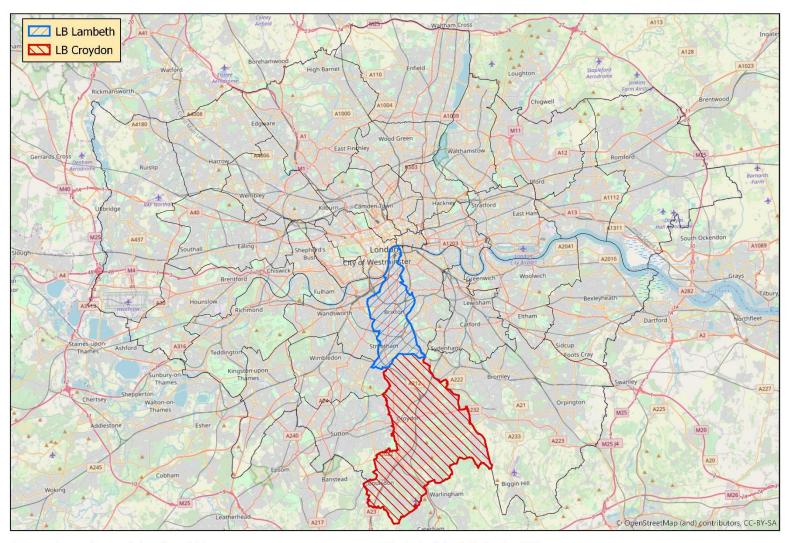
Lambeth is an inner London borough with a northern boundary on the River Thames and situated mainly between the boroughs of Wandsworth and Southwark. It covers an area of approximately ten and a half square miles. It is surrounded by seven other London Boroughs - LB Southwark; LB Bromley; LB Croydon;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

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 long.

This Statement includes the whole of the LB of Lambeth and the whole of the LB of Croydon.

Map 2 – Boroughs involved in this Statement



4. Strategic Matters

The adopted Lambeth Local Plan sets out the Strategy for development in the borough for the life of the plan (2020–2035). The SADPD will add site-specific policies to those already in the Lambeth Local Plan 2021: its principal objective is to unlock investment on these sites through the mechanism of site-specific planning policy. It sets out site allocation policies for 13 sites distributed across the borough.

Sites are included in this Draft SADPD for one or more of the following reasons:

- to set clear, site-specific parameters for the type and scale of development expected on a site, including the associated public benefits it should deliver;
- to address site-specific circumstances that may require a more tailored approach to that set out in borough-wide policies;
- to articulate the vision and potential that can be achieved through land assembly and/or a comprehensive approach to developing adjacent sites, particularly where these are in different ownerships;
- to encourage landowners to consider the potential for optimising the development capacity
 of their land and help deliver key place- making objectives;
- to signal some additional sites as appropriate for tall buildings, outside the locations already identified in the Local Plan; and
- to enable key strategic infrastructure to come forward in a timely way.

All have potential to deliver housing alongside commercial uses, apart from two that relate to hospital campuses. They include four sites in Waterloo, three in Brixton, one in Streatham, one in West Norwood/Tulse Hill, one in Kennington and three in Loughborough Junction.

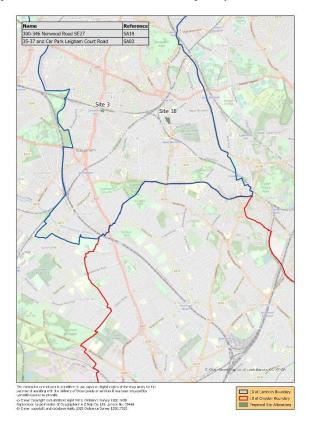
LB Lambeth have been guided by a design-led optimisation of development capacity, as required by London Plan Policy D3. The indicative scale and massing has been informed by the site and its context and an analysis of the opportunities and constraints these present. Each site allocation policy includes a brief statement of the vision for the site, highlighting the opportunity presented by its redevelopment and its potential to contribute to strategic place-making. In addition, each site allocation policy, sets out the requirements and expectations for the site.

Officers from Croydon and Lambeth met in November 2022 to discuss the potential impact of the proposed site allocations set out in the draft SADPD. LB Croydon sought to be reassured that LB Lambeth had enough deliverable sites to meet the needs of the Borough set against their housing target in the London Plan 2021.

Lambeth's ability to meet its London Plan housing target was demonstrated through the examination of the Lambeth Local Plan 2021. However, the new site allocation policies will help to accelerate delivery of housing, including affordable housing, in the borough. This will contribute to maintaining the necessary pipeline of new housing and thereby help ensure housing delivery targets continue to be achieved. They will also enable the timely renewal and optimisation of social infrastructure and commercial floorspace.

Additionally, given the scale and location of the proposed site allocations (the site allocations in close proximity to Croydon are shown on Map 4 below), the parties agree that the proposed site allocations are unlikely to give rise to any cross-boundary issues of a strategic nature.

Map 4 – Proximity of draft site allocations to the border of Croydon



This SCG demonstrates that discussions have taken place to consider any strategic and cross-boundary issues that the draft SADPD may give rise to, and that both parties agree that no additional strategic issues are likely to arise as a result of this document (details set out in Annexe 1).

5. Governance Arrangements

This SCG has been informed by on-going engagement between the parties – as evidenced within Section 3 of this document which explains the joint working arrangements, alongside the schedule of engagement between the parties in Annexe 1.

These are live documents that are kept under review, 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 and Table 2) will be triggers for the SCG to be reviewed, however strategic matters will be dealt with on an on-going basis inbetween formal reviews of the SCG.

Timetable for agreement, review and update

LB Lambeth adopted its Local Plan in September 2021. As explained above, once adopted the SADPD and Lambeth Local Plan 2021 will form part of the development plan for the borough, alongside the South Bank & Waterloo Neighbourhood Plan, and the London Plan 2021. The key dates for this review are set out in Table 1 below.

The Croydon Local Plan was adopted in February 2018. Croydon has undertaken a review of its policies which will update the vision and strategy for Croydon's growth up to 2039. This was published for consultation in 2022 and another round of consultation is expected to take place in early 2024 The borough is expecting to submit the Croydon Local Plan Review in 2024, with the key dates set out in Table 2 below.

Table 1: Current Development Plan Documents being produced by LB Lambeth

| Dev Plan Document | Date of review | Reg 18 date | Anticipated Reg 19 date | Anticipated submission date |
|----------------------|----------------|-------------|----------------------------|-----------------------------|
| Site Allocations | 2021 | Jan 2022 | Spring 2024 | Spring / Summer |
| DPD | | | | 2024 |

Table 2: Current Development Plan Documents being produced by LB Croydon

| Dev Plan | Date of review | Reg 18 date | Reg 19 date | Anticipated |
|---------------|----------------|-------------|-------------|-----------------|
| Document | | | | submission date |
| Croydon Local | 2018 | Nov 2019 | Jan 2022 | 2024 |
| Plan Review | | | Jan 2024 | |

6. Signatures

Both parties agree that this statement is an accurate representation of matters discussed and issues agreed upon.

It is agreed that these discussions will inform both Lambeth's SADPD and Croydon's future planmaking activities and both parties will continue to work collaboratively in order to meet the duty to cooperate.

| Signed: | | |
|--|--|--|
| Name: Steve Dennington | | |
| Position: Service Head - Spatial Planning, Growth Zone and Regeneration | | |
| London Borough of Croydon | | |
| Date 19 Dec 2023 | | |
| | | |

Annexe 1. Schedule of engagement between the parties since last SCG

On 23 November 2022, policy officers from both parties met to discuss strategic cross border planning matters under the duty to cooperate and to develop this SCG for the SADPD. Lambeth officers provided a presentation to Croydon officers outlining the proposals, including an overview of the nearest site to the border. No issues were identified provided the allocations were deliverable and would meet the London Plan housing target, and it was agreed that Lambeth would lead on this SCG.

In addition, LB Lambeth and Croydon took part in the All London Borough Planning Officer meetings (Association of London Planning Officers) which takes place approximately every 6 months. These meetings provide an opportunity to discuss strategic planning issues in London.

Annexe 2. December 2019 Statement of Common Ground

Please visit this link to the Local Plan 2021 evidence base for the Statement of Common Ground between London Borough of Lambeth and the London Borough of Croydon December 2019