

Statement of Common Ground between
London Borough of Lambeth 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 2020 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 Croydon

The Croydon Local Plan was adopted in February 2018. Croydon is reviewing its 2018 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 the majority of cross boundary matters between Lambeth and Croydon. However 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 and (v) green infrastructure, a separate tri-lateral Statement between Lambeth, Croydon and Bromley addresses these five strategic cross boundary matters.

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. Both parties have effectively co-operated with the GLA regarding the development of its evidence base particularly in relation to business needs and likely changes in the market.

All London Green Grid

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

LB Lambeth

Lambeth is an inner London borough with a northern boundary on the River Thames. 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.

The following Geographic Designations are within Lambeth but are noted by be close to the LB Croydon boundary

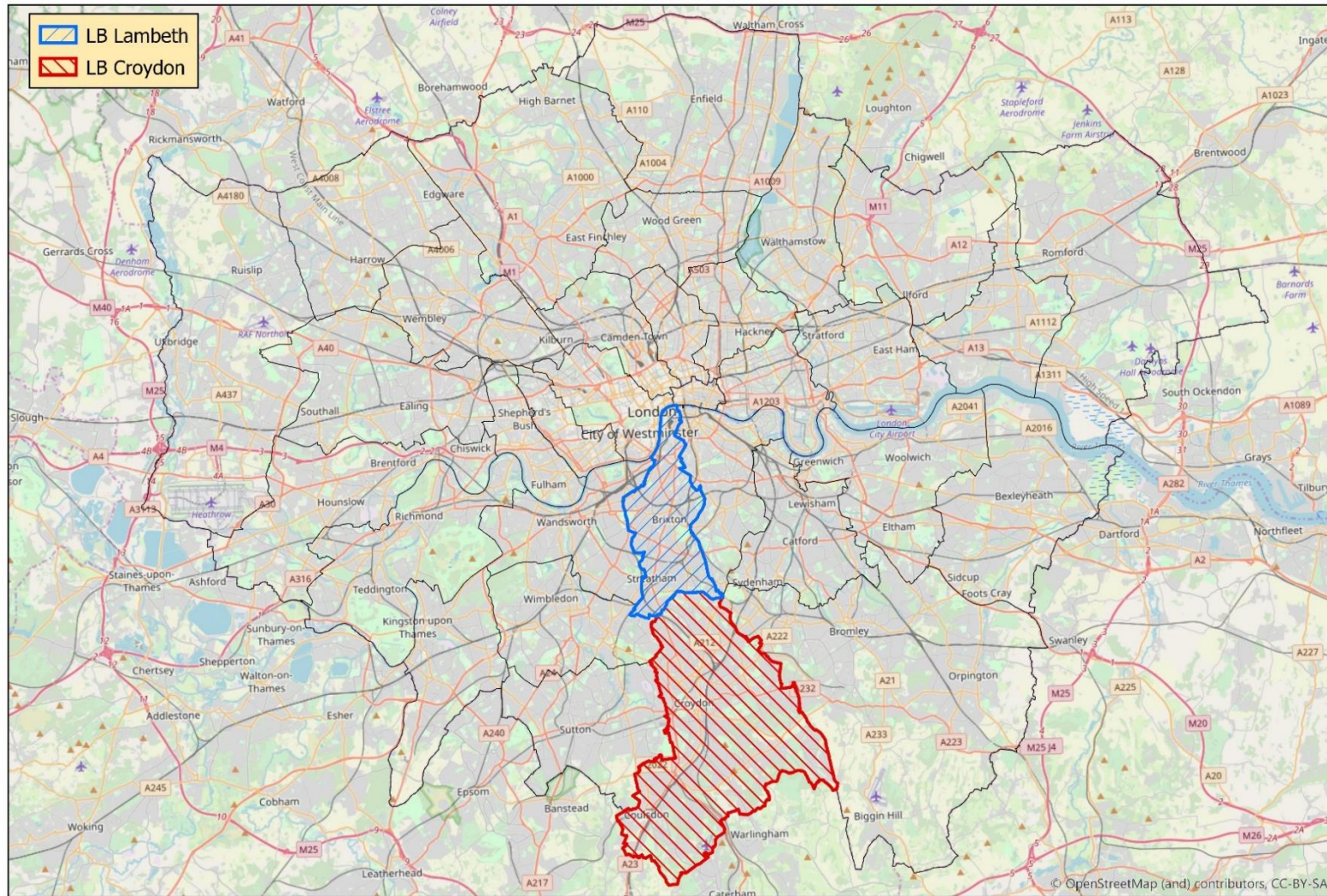
LB Croydon

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.

¹ Also known as the London Economic Action Partnership

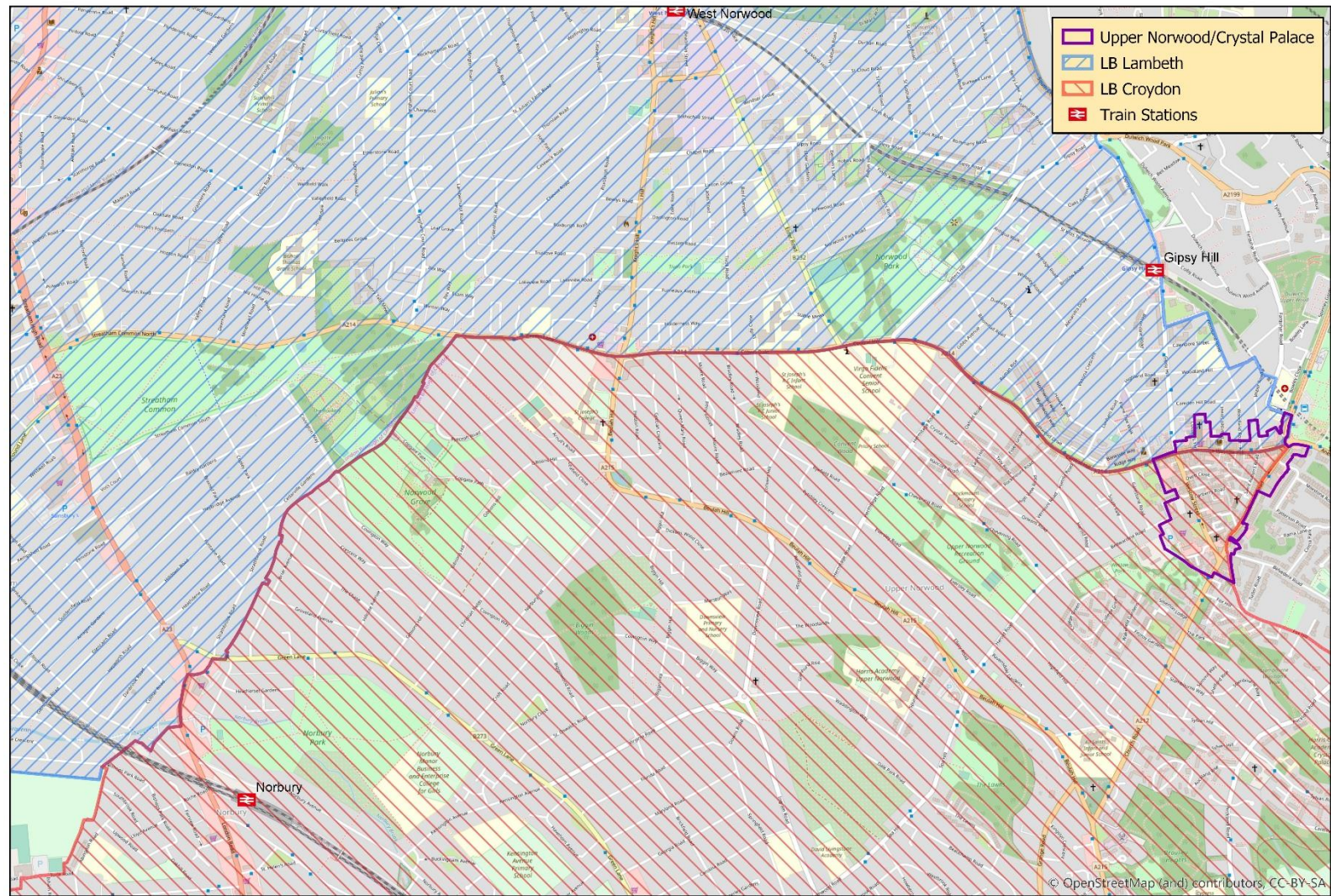
Map 1 – Boroughs involved in this Statement



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



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Neighbourhood planning

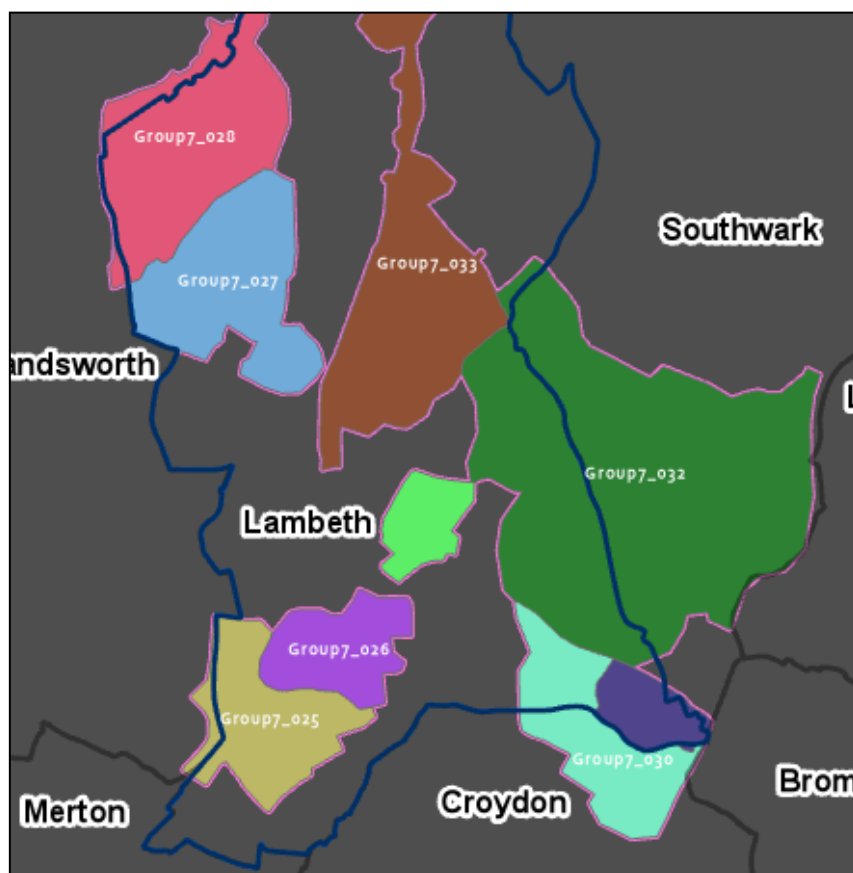
There are no designated neighbourhood planning areas spanning, or close to, the borough boundary between the two parties.

Flood risk

The Thames Barrier is managed and maintained by the Environment Agency and protects 125 square kilometres of central London from flooding caused by tidal surges. This includes the protection of just under 29,000 properties in Lambeth. The Thames tidal defences also include tidal walls and embankments along the banks of the River. 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.



Map 3 - Critical Drainage Areas in Lambeth

Critical Drainage Areas spanning the borough boundary between the Lambeth and Croydon:

- Group7_030
- Group7_031

The provision of energy (including heat)

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

The London Heat Map is an online tool, developed by the Mayor, used to find opportunities for decentralised energy (DE) projects in London. The Mayor has identified Heat Network Priority Areas, which can be found on the London Heat Map website (see DRLLP policy EN3). These identify where in London the heat density is sufficient for heat networks to provide a competitive solution for supplying heat to buildings and consumers.

No existing or proposed heat networks cross the borough boundary between Lambeth and Croydon.

Strategic and local views

Strategic views:

- No strategic views cross the borough boundary between Lambeth and Croydon

Lambeth local views into Croydon:

- The Rookery (LV21)

Croydon local views into Lambeth:

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).

Conservation areas in Lambeth adjoining Croydon:

- Westow Hill (CA23)
- Streatham Common (CA43)
- Streatham Lodge (CA62)

Conservation areas in Croydon adjoining Lambeth:

- Upper Norwood Triangle
- Harold Road
- Norwood Grove

Archaeological priority areas in Lambeth adjoining Croydon:

- Roman Road APA4

Archaeological priority areas in Croydon adjoining Lambeth:

- Norwood Grove
- London to Brighton Roman Road

Historic parks and gardens in Lambeth adjoining Croydon:

- The Rookery

Historic parks and gardens in Croydon adjoining Lambeth:

- Norwood Grove

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. Through their own local plans, authorities must plan to meet or exceed their London Plan target to ensure they are in general conformity with the London Plan.

- 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.
- Croydon can meet its housing targets set out in the Croydon Local Plan 2018, and is currently consulting until 13 January 2020 on how it might meet the targets set out in the draft London Plan. At this point in time, Croydon is not asking Lambeth to meet any of its housing need.

4.2b. Affordable housing

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

- Both Lambeth and Croydon have a need for social and affordable rented accommodation that is higher than can be delivered within each borough. Croydon is currently consulting on whether to adopt the Mayor's threshold approach to affordable housing for all applications in Croydon. Lambeth already supports the approach. Both boroughs support the Mayor's strategic target of 50% affordable housing across London. Both boroughs agree to seek to meet as much of that need as is possible within their own respective boroughs and that neither borough is able to help meet the needs of the other.

Gypsies and Travellers

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.

LB Croydon has a need for 36 pitches between 2016 and 2036 and is planning to meet this need within its border. The first ten years of this need will be met through the development of the Purley Oaks depot site (allocated in the Croydon Local Plan 2018 for 20 Gypsy and Traveller pitches), and

the expansion of the existing Gypsy and Traveller site at Lathams Way. The Croydon Local Plan 2018 sets out a policy mechanism through which the need for the last ten years can be met.

4.3 Health

The six south east London CCGs (Bexley, Bromley, Greenwich, Lambeth, Lewisham and Southwark) received approval to merge from 1 April 2020. This merger will enable the new South East London CCG to work in greater partnership with local authorities in each borough; and commission services for those patient pathways that span the entire south east London integrated care system. Our Healthier South East London programme (OHSEL) is the body responsible for the delivering the Sustainability & Transformation Plans (STPs) for the six boroughs.

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.

- Croydon and Lambeth agree that both boroughs are meeting the need for healthcare facilities in their areas, and that through close working with NHS bodies, this incorporates any cross-boundary movements of patients.

4.5 Education

Both parties have a 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 the Croydon Infrastructure Delivery Plan 2019.

- Lambeth and Croydon have both planned to meet their school place needs within their own boroughs, and intend to continue to do so, taking into account an allowance for cross-boundary movements as part of their pupil place forecasting.

4.6 Telecommunications

- Both parties **agree** that there have been or will continue to be on going duty to cooperate discussions on emerging Local Plan policies for the delivery of digital connectivity infrastructure where there are cross-border implications

4.7 Security

- Both parties **agree** that there have been or will continue to be on going duty to cooperate discussions on emerging Local Plan policies for counter terrorism measures such as hostile vehicle mitigation as required.

4.8 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.

Croydon is one of the four boroughs of the South London Waste Plan alongside the Royal Borough of Kingston, the London Borough of Merton and the London Borough of Sutton. The councils adopted the South London Waste Plan (SLWP) in 2012 that runs to 2021. Joint work with the south London Waste authorities on a revised waste plan has commenced with an issues and options consultation started in October whose plan period will be from 2021 to 2036.

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

- Both parties **agree** to plan separately to meet their respective Local Plan waste apportionments following the approach described above.

4.9 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, 2015) 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. Croydon has been ranked the 4th settlement in England most susceptible to surface water flooding.

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

- Each party has had regard to each other's flood risk policies and **agree** that they are complimentary.

Croydon and Lambeth are hydraulically connected through shared watersheds which impact on each borough's risk of flooding from surface water. The risk of flooding from surface water is assessed in

each parties' respective Surface Water Management Plans, where areas at significant risk of flooding are identified and are labelled as Critical Drainage Areas (CDAs).

There are 10 CDAs within Lambeth, of which two are shared with Croydon (Group7_030 and Grou7_031).

- **Lambeth and Croydon agree** to work collaboratively to reduce the risk of flooding within Critical Drainage Areas.

4.10 Provision of energy (including heat)

Not applicable.

4.11 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.

Croydon Council declared a Climate Emergency in June 2019 and this is now a priority that is a key issues where Local Plan policies to address this are being reviewed through the Issues and Options consultation of the Croydon Local Plan review. It is envisaged that this will be addressed through the delivery of increasingly carbon neutral homes that promote the use of alternatives to the private car.

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.

- The DRLLP PSV 2020 follows the approach outlined in the Draft London Plan for zero carbon developments (see DLP policy SI2) and aligns with the Mayor's urban greening objectives (including adopting an urban greening factor – see DLP policy G5).
- Croydon has declared a Climate Emergency and is currently consulting on a Local Plan review to address this important matter taking account of the approach in the emerging London Plan. There have been or will continue through on going duty to cooperate discussions to inform the development of Local Plan policies.

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

Strategic and local Views

- Lambeth wish to discuss with Croydon a protocol by which Lambeth will be consulted on relevant major planning applications that fall within Lambeth Local View LV21 The Rookery.

Heritage, design and conservation

- Both parties **agree** to have regard to the setting of heritage, design and conservation designations adjoining the borough boundary in the neighbouring borough

Both parties agree that there will be further discussions on future proposals that could impact Conservation Area designations, particularly those in the Upper Norwood/Crystal Palace area (this detail is in a separate agreement).

4.12 Heritage and 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).

Croydon vision which is reflected in the vision of CLP18 is for a place that draws people to its culture and creativity – an inspiration and enabler of new artistic and sporting talent in the country. The adopted Local Plan policies seek to deliver this vision and are not a focus for review of the Local Plan (except for updating and to address changes needed to deliver sustainable development).

- Both parties **agree** that there have been or will continue through on going duty to cooperate discussions to have regard to supporting heritage and cultural matters during the development of Local Plan policies.

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
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 both 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: 

Name: Cllr Matthew Bennett

Position: Cabinet Member for Planning,
Investment & New Homes

London Borough of Lambeth

Date: 08/01/2020

Signed: 

Name: Steve Dennington

Position: Service Head - 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 on:

- 21st November 2018
- 29th October 2019 (with Bromley)

Flood officer meetings:

Lambeth's and Croydon'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:

Lambeth

On 9th October 2017, Lambeth notified 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 Croydon.

On 22nd October 2018, Lambeth notified 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 Croydon to make representations.

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 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>It is noted that the DRLLP includes an increased housing target for Lambeth as set out in the emerging New London Plan (NLP) which is supported. As background to this, the CLP18 has a housing target of 32,890 (2016 – 2036) which will be delivered in three almost equal ways; in the Croydon Opportunity Area, on allocated development sites and the sustainable growth of the suburbs. However, the target in the NLP proposes to increase Croydon’s target 1,435 per annum to 2,949 per annum. How to deliver this level of growth will be considered and addressed in the review of CLP18 as set out in the LDS. However, it should be noted that the housing target in the CLP18 is capacity based and given the higher housing target in NLP it is very unlikely Croydon will have capacity for unmet needs of other local authorities.</p>	Section 05	H01	Noted.	No change.
<p>It is noted and supported that the DRLLP updates housing policies to reflect legislation and updated evidence, including reflecting the affordable housing target and the need for this to be delivered on small sites as set out in the New London Plan. The approach to housing is supported.</p>	Section 05	H02	Support noted.	No change.
<p>The general approach in the DRLLP has a similar approach to the NLP to protect industrial capacity whilst offering prospects of bringing about investments and renewal of industrial/employment locations. The detailed policies encouraging flexible workspaces which are suitable for small and medium business and the requirement for developments to include a proportion of affordable workspaces is supported.</p>	Section 06	ED01	Support noted.	No change.

<p>The general approach in the DRLLP has a similar approach to the NLP to protect industrial capacity whilst offering prospects of bringing about investments and renewal of industrial/employment locations. The detailed policies encouraging flexible workspaces which are suitable for small and medium business and the requirement for developments to include a proportion of affordable workspaces is supported.</p>	Section 06	ED02	Support noted.	No change.
<p>The general approach in the DRLLP has a similar approach to the NLP to protect industrial capacity whilst offering prospects of bringing about investments and renewal of industrial/employment locations. The detailed policies encouraging flexible workspaces which are suitable for small and medium business and the requirement for developments to include a proportion of affordable workspaces is supported.</p>	Section 06	ED03	Support noted.	No change.
<p>Croydon is one of the four boroughs of the South London Waste Plan alongside the Royal Borough of Kingston, the London Borough of Merton and the London Borough of Sutton. The councils adopted the South London Waste Plan in 2012 and have just started work on a replacement plan whose plan period will be from 2021 to 2036. It is noted that Lambeth will plan for waste as an individual authority and has reflected the approach in the NLP.</p>	Section 09	EN07	Noted.	No change.