

Statement of Common Ground

Introduction

1. This is one of a series of documents that will be used to demonstrate how effective and on-going joint working will inform strategic policy-making through the review of the Croydon Local Plan 2018 to meet the requirements of the Duty to Cooperate. The strategic cross-boundary matters that are being addressed are set out.
2. In this statement the parties Involved are;
 - London Borough of Croydon (LBC)
 - London Borough of Sutton (LBS)

Strategic Geography

3. The map below shows the geographical relationship between the boroughs as well as the South London Waste Partnership authorities.



4. Croydon and Sutton are both outer London boroughs as defined in the London planning process (Annex 2 of the emerging London Plan). They both have boundaries to the south to Surrey and the local planning authorities of; Surrey County Council, Mole Valley, Reigate & Banstead and Tandridge.

Strategic Planning Issues Identified

5. The two local authorities have identified and agreed that across their two boroughs there are strategic planning issues that need to be addressed through the duty to cooperate. These strategic planning matters are;
 - Delivering housing need for the housing market area (including Gypsy and Traveller needs)
 - The Economy
 - Infrastructure provision
 - Waste management
 - Specific project areas
 - Purley Way Chapter of the Croydon Local Plan

6. These strategic matters are set out in turn below with ongoing actions and whether there is agreement on these at the publication date of this Statement of Common Ground

Housing

7. The current housing target in the CLP18 plans for 32,890 homes over the plan period. This was based on an estimated need in 2015 for 44,149 homes which due to limited developable land it was not considered possible to deliver the full need. The emerging new London Plan development strategy is based on the concept of sustainable intensification making much more efficient use of land and focusing growth on well-connected locations. The housing target for Croydon is now higher than the adopted CLP18 reflecting the new emphasis that the contribution outer London can play in delivering housing. However, the approach set out in the emerging new London Plan recognises that every borough needs to play its part if London is to meet its overall housing need.
8. To inform the development of appropriate housing policies LBC has produced an updated Strategic Housing market Assessment (SHMA)¹. Using the government standard methodology as well as the housing target in the emerging London Plan the SHMA indicates a requirement from 2016 to 2036 for 2,302 homes per year. However, as the emerging new London Plan sets a target of 2,949 for 2019 to 2029 how the specific requirements of housing need such as affordability, tenure and mix would need to be delivered based on these targets has been considered. The draft SHMA was shared with LBS when it was available.
9. The process of identifying in detail how the revised target in the emerging new London plan may need to be addressed and if necessary delivered through their respective Local Plan review processes. LBC are already reviewing their Local Plan and did not object to their housing target in the emerging London Plan in principle and the approach to the Local Plan review is that this target will be met.
10. LB Sutton is not currently reviewing its Local Plan and has no immediate plans to do so. LB Sutton considers that the housing target in the draft London Plan for small sites is not based on evidence and is undeliverable. LB Sutton welcomes the findings of the draft London Plan Panel Report.
11. Whether there will be any "headroom" to accommodate the needs of others in Croydon to meet the Duty to Cooperate is also unknown at this stage. The three options that have been developed and will be presented in the Croydon Issues and Options consultation all deliver at least 46,040 homes. Additionally, as there is Green Belt in the borough if to meet the needs of Croydon development the Green Belt is required other authorities will need to be approached to see whether any of the needs of Croydon can be met in their areas before a strategic approach to releasing any Green Belt can be put forward. This is option 3 in the Issues and Options consultation. If this option (or a combination including some release of Green Belt) is required to meet the Green Belt tests LBC will approach LBS and others to see whether they have any capacity to accommodate the housing needs of LBC.
12. LBS housing approach

¹ [Strategic Housing Market Assessment \(SHMA\) August 2019](#)

13. LB Sutton adopted its Local Plan in February 2018 with a housing target of 427 net additional dwellings per annum (dpa), an increase from the adopted London Plan figure of 363 net dpa. LB Sutton considers this figure to be ambitious but deliverable and has no immediate plans for a Local Plan review. The draft London Plan housing target for Sutton is 939 net dpa, with 739 units expected to be delivered on small sites. LB Sutton considers the methodology for calculating the small sites target is not based on evidence and so is not deliverable. LB Sutton notes the findings of the draft London Plan Panel Report and welcomes the conclusion that the small sites target should be reduced.

Approach to Meeting Housing Need

14. Housing need is a strategic issue dealt with at the regional level in London by the Mayor. Within the Draft London Plan 2017 (consolidated with proposed further changes July 2019), the Mayor sets borough-level housing targets. These targets are based on evidence of housing capacity in the capital set out in the London Strategic Housing Land Availability Assessment 2017 (London SHLAA 2017) and underwent examination during 2019. The Panel of Inspectors appointed by the Secretary of State issued their report and recommendations to the Mayor on 8th October². The Mayor is currently considering the Panel report and recommendations and is preparing an Intend to Publish version of the London Plan by the end of the year. It is noted by LBC and LBS that the Panel Report sets out, amongst other recommendations, that the Mayor should reduce the ten year small site housing target for boroughs to reduce the housing target. As both are outer boroughs with a large part of the housing needing requiring to be delivered on small sites this has implications for LBC and LBS which require further ongoing in house work and joint discussions.

15. The Panel report proposes a target of 469 net dpa for Sutton, which would be an increase of 42 net dpa above the Local Plan target. LB Sutton considers that this increase can be absorbed and has short to medium term concerns about meeting this proposed target.

16. For both authorities as required by paragraph 67 of the NPPF there is a requirement to identify a sufficient supply of land to meet the estimated housing need. Therefore both authorities will seek to continue to meet their housing need. The next stage will be for both authorities to have regard to the strategic approach that the London Plan seeks once the Mayors Intend to Publish version is available and the final London Plan is adopted.

Action (s):

Consider locally and through joint discussions how to deliver the strategic approach that the London Plan seeks once the Mayors Intend to Publish version is available at the **end of 2019**.

The Economy

17. The adopted CLP18 sets out in accordance with paragraph 20 of the NPPF the approach to the provision of land for industry and warehousing up to 2036. This adopts a 4 Tier approach which includes continued protection to support employment sectors in the borough as well as the redevelopment of employment land to meet future needs.

² [London Plan Inspectors Report 2019](#)

In the Sutton Local Plan a similar tiered approach is used to protect employment land and enable redevelopment to meet future needs.

18. There is a significant area of employment land that crosses the boundaries of the two boroughs, known as Purley Way (in Croydon and Beddington Lane in Sutton. This area although crossing the two borough bound area and planned for separately in each local plan. This employment area is identified in the London Plan as a Strategic Industrial location for uses that support the functioning of London's economy. For this reason a strategic approach to planning for this area is needed between LBC and LBS to ensure that this area continues to support both the local economies in each borough as well as the functioning of London's economy.
19. LBS is experiencing considerable demand for industrial land: vacancy rates are low and employers are seeking space on all the borough's Strategic Industrial Locations. The Inspector's recommendation required, 4.4 hectares of Metropolitan Open Land had to be pre-designated for industrial land within the 2018-adopted Sutton Local Plan. Through discussion LBS has explained that this demand for industrial land shows no sign of abating. Table 6.2 of the Draft London Plan categorises the London Borough of Sutton as a "Provide Capacity" borough and Table 15.1 of the Industrial Land Demand report (CAG Consultants for the GLA, 2017), on which the Draft London Plan categorisations are based, requires that the London Borough of Sutton finds an additional 14.5ha of industrial land by 2041. Finding this additional land will be extremely challenging for the LBS, with vacancy rates low and the land market favouring housing over industrial land. In any future review of its Local Plan, the LBS does not wish to find itself in the position where it is forced to de-designate more Metropolitan Open Land. This is discussed in more detail below under 'Purley Way'.
20. To support the economy the approach to office space in accordance with the London Plan the CLP18 seeks to protect and direct office development to the central Croydon area. Sutton is seeking to deliver the majority of the additional office floorspace required within Sutton Town Centre, around Sutton station. As these two locations are geographically distant the planned growth would not have impact on either.
21. The review of the CLP18 is not intended to change this strategic approach as this would still be consistent with the emerging London Plan, as similarly to the housing approach, the strategy is based on planning for sufficient employment and industrial space in the right location to support economic development and regeneration.
22. The Mayor is currently considering the Panel report and recommendations and is preparing an Intend to Publish version of the London Plan by the end of the year. It is noted by LBC and LBS that the Panel Report sets out, amongst other recommendations, that the Mayor should provide a more positive strategic framework for the provision of industrial capacity. This may have implications for LBC and LBS which require further ongoing in house work and joint discussions. Given that there is a requirement to review Local Plans every five years it is firstly needed through discussion to consider whether this matter needs to be addressed in the current review of the CLP18 or at the next review. As no further evidence on employment has been undertaken these discussions will firstly focus on whether the current review of the CLP18 would need to include updated employment policies and whether producing or commissioning joint research and evidence to address cross-boundary matters is required.
23. Therefore both authorities will seek to continue planning for sufficient employment and industrial space. Both authorities will need to have regard to the strategic approach that the London Plan seeks once the Mayors Intend to Publish version is available.

Action (s):

Consider locally and through joint discussions how to deliver the strategic approach to employment that the London Plan seeks once the Mayors Intend to Publish version is available at the end of 2019.

Consider how and in what timeframe it is necessary to address the strategic approach to employment that is reflected in the adopted London Plan and consider producing or commissioning joint research and evidence to address cross-boundary employment matters **post adoption of the London Plan early 2020**.

Infrastructure provision

24. The current CLP18 plans for the provision of sufficient infrastructure to meet all development needs over the plan period. The review of the CLP18 is focussed on the delivery of additional homes to meet the estimated need. However as the emerging new London Plan development strategy is based on the concept of sustainable intensification making much more efficient use of land and focusing growth on well-connected locations development is proposed in sustainable locations where there is existing infrastructure. To understand how the higher housing target can be accommodated a Development Infrastructure Funding Study has been commissioned by LBC Croydon to plan for infrastructure provision to support the higher housing target.

25. Through ongoing discussions infrastructure provision which serves both authorities has been identified;

Trams

26. The south London tram network crosses the boundaries of the two boroughs, although only one stop is located with LBS. There are current plans for the extension of the tram network with ongoing discussions with Transport for London with both authorities. The proposed route of Tramlink extension to LBS is safeguarded in its adopted Local Plan. Although the specific details for the delivery of future tram capacity can be taken locally a strategic approach also needs to be considered- For this reason a strategic approach to planning for this area is needed between LBC and LBS to ensure that the transport provision can provide for sustainable growth.

Healthcare Facilities

27. The London Cancer Hub located in Sutton is recognised as a centre focussing on this specialist area. The Croydon Mayday hospital is recognised for its specialist care for maternity services. It is recognised that both will involve redevelopment and improved to support their specialisms.

Education

28. Secondary schools – LBC are a net outflow to Sutton (largely due to Grammar Schools) so further discussion and monitoring is needed through infrastructure evidence when the location of housing is known to establish the spatial needs for secondary education. Primary school provision is a local matter due to the catchments but depending on the location of housing in emerging local plans further clarification will be required.

Action:

Consider how and in what timeframe it is necessary to address the strategic approach to transport infrastructure and in particular the delivery of additional tram capacity to delivery sustainable growth to support the planned development in emerging Local Plans.

Waste management

29. The two authorities that are party to this statement are one of the four south London boroughs of Croydon, Kingston, Merton and Sutton have a responsibility to plan for waste facilities as statutory Waste Planning Authorities. Since 2007, the four boroughs have planned for waste collaboratively and produced a joint Development Plan Document (DPD); the South London Waste Plan which was adopted in 2012 covering a 10 year time period 2011 to 2021. With the other two Waste Authorities joint planning has taken place and the South London Waste Plan Issues and Preferred Options document has been produced as the start of the process of updating the 2012 waste plan. This is anticipated to be adopted in 2021. It will then cover the planning period 2021 to 2036.
30. Additionally, representations were made to the emerging London plan and a joint Statement of Case from the four boroughs was produced for the examination into the London Plan. The Panel of Inspectors appointed by the Secretary of State issued their report and recommendations to the Mayor on 8th October. The Mayor is currently considering the Panel report and recommendations and is preparing an Intend to Publish version of the London Plan by the end of the year. It is noted by LBC and LBS that the Panel Report did not make any significant recommendations for changes to the London Plan. Therefore it is considered that the review of the South London Waste Plan as a joint strategic project as well as ongoing local discussions about how waste management can deliver the strategic approach to waste management that the London Plan eventually seeks should be considered once the Mayors Intend to Publish version is available at the end of 2019. LBs will continue to be the lead authority on the South London Waste Plan.

Action (s):

Consider locally and through joint discussions how to deliver a strategic approach to waste management that the London Plan seeks once the Mayors Intend to Publish version is available at the **end of 2019**.

As part of the South London Waste Partnership continue to undertake work to produce a joint DPD to deliver sufficient sites and capacity to plan for waste management. The timetable shall be in accordance with that set out in the Local Development Schemes, with **adoption in July 2021**.

Specific project area Purley Way Chapter of the Croydon Local Plan

31. Through the Local Plan review LBC have identified 3 options to accommodate the additional housing need. All three options, to varying scales propose to deliver housing around the Purley Way (South, Fiveways and North), whilst respecting the existing commercial protection designations. Strategic option one and three would deliver around 5,000 homes but option 2 proposes 12,000 homes. This project would see a comprehensive approach to planning in the area testing and developing options for mixed use development to maximise the use of brownfield sites to deliver housing and

employment in a sustainable way. Following an opportunity area approach development will be set out in a new Local Plan Chapter, which could include indicative concept masterplan and toolkit for development in this area. LBC have obtained a House Building Fund grant from the Mayor to initially develop this strategy. LBC informed Sutton that the grant bid was successful LBC when the formative stages of plan making developing the Issues and Options. LBS set out concerns regarding the redevelopment of Purley Way. A summary of these concerns and the updated position and ongoing discussions that

32. Loss of Industrial Land

- a) The overall position of employment land provision has already been set out in the economy section above however for the Purley Way area, given the cross boundary location of this employment area LBS are specifically concerned for the future capacity as a result of any redevelopment of the Purley Way area. LBS considers it is imperative that the London Borough of Croydon, as a minimum, retains all of its existing industrial land, measured in hectares of industrial land as that is the unit on which industrial land tends to be considered at Examinations-in-Public.
- b) Furthermore, the London Borough of Sutton would welcome the London Borough of Croydon increasing its industrial land area in the Purley Way area so as to take the pressure off the Beddington Farmlands Metropolitan Open Land in Sutton, which has been designated as the Wandle Valley Regional Park and which will provide all the benefits of open space for residents of Croydon as well as Sutton and Merton. Finding this additional land will be extremely challenging for the London Borough of Sutton, with vacancy rates low and the land market favouring housing over industrial land. In any future review of its Local Plan, the London Borough of Sutton does not wish to find itself in the position where it is forced to de-designate Metropolitan Open Land.

33. Social Infrastructure - If significant housing is to be provided within the Purley Way area, the London Borough of Sutton would wish to be assured that the appropriate level of social infrastructure is provided, principally secondary school provision.

34. Transport issues – in addition to the discussions about infrastructure provision when developing the policies for the Purley Way Chapter LBS wishes LBC to consider the Coomber Way-Ampere Way Connection to A23 is maintained as a route primarily for industrial vehicles.

Action

LBC will be developing the specific policies to deliver the preferred option following consultation on the Issues and Options for the review of the Local Plan.

Governance Arrangements

35. General Strategic Issues alongside the review of Local Plans – ongoing regular meetings will take continue to take place. Current frequency is every 3 months which will continue. Through these meetings the discussions will include progressing the identified key strategic issues, evidence gathering and in particular opportunities to work jointly and the requirements of the emerging London Plan. Led by LBC

36. Purley Way Project – As above through the local plan process but there will be the opportunity for Sutton to be involved in the stakeholder meetings. LBC will lead.
37. Waste Plan - preparation will continue in accordance with the agreed timetable. Meetings will be set to meet the agreed milestones. Led by LBS

Timetable for review and ongoing cooperation

38. This Statement will be reviewed once the London Plan with another statement agreed at regulation 19 stage of the review of the Croydon Local Plan
39. Meetings and annual progress on the duty to cooperate will be recorded in the authorities monitoring reports. This will then be fully reported in a Statement of Compliance on submission of a DPD.

Submission of a Plan

At submission the ongoing discussions as recoded in this template will be reflected in a Statement of Compliance with the Duty to Co-operate. This will identify the strategic matters and the key issues that have been addressed, and then show how the parties have done all that they reasonably could have in trying to resolve the issues through co-operation (e.g. by including meeting notes and agreements in appendices).

Date: 7.11.2019