

Statement of Common Ground Between

London Borough of Merton and
London Borough of Wandsworth

25 January 2022

1. Executive Summary

- 1.1. A Statement of Common Ground (SCG) is a written record of the progress made by strategic policy-making authorities during the process of planning for cross-boundary matters. This SCG has been prepared to demonstrate that Merton's and Wandsworth's draft Local Plans are '*based on effective joint working on cross-boundary strategic matters*', in accordance with the requirements of paragraph 27 of the National Planning Policy Framework (NPPF) and the Planning Practice Guidance chapter on Maintaining Effective Co-operation.
- 1.2. This SCG focuses on strategic cross-boundary matters being addressed and progress in cooperating to address them. It also forms part of the evidence demonstrating compliance with the 'duty to cooperate'. In the London context, most strategic issues beyond borough boundaries (e.g. housing targets, major growth areas, etc.) are largely addressed by the London Plan.
- 1.3. This SCG does not preclude individual boroughs producing their own Statements of Common Ground covering a different geography and/or issues in support of their own plans. 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. It forms part of the evidence to demonstrate compliance with the 'duty to cooperate'. The document is intended to be 'live', updated as circumstances change, and agreement occurs on any outstanding issues.

2. Parties Involved

- 2.1. This SCG will address strategic spatial policies to be addressed directly by collaboration with the relevant Local Planning Authorities. The London Boroughs listed below have been included as they are immediately adjacent to the London Borough of Wandsworth (LBW). The Council is engaged with them on strategic matters on an on-going basis.
- 2.2. This SCG has been prepared by Merton Council in agreement with the London Borough of Wandsworth.

3. Signatories

London Borough of Merton agree to matters referred to in this document which directly impact them, as outlined in the 'Strategic Matters' section.



Signed: James McGinlay

Position: Assistant Director Sustainable Communities

Date: 27th January 2022

London Borough of Wandsworth agree to matters referred to in this document which directly impact them, as outlined in the 'Strategic Matters' section.



Signed:

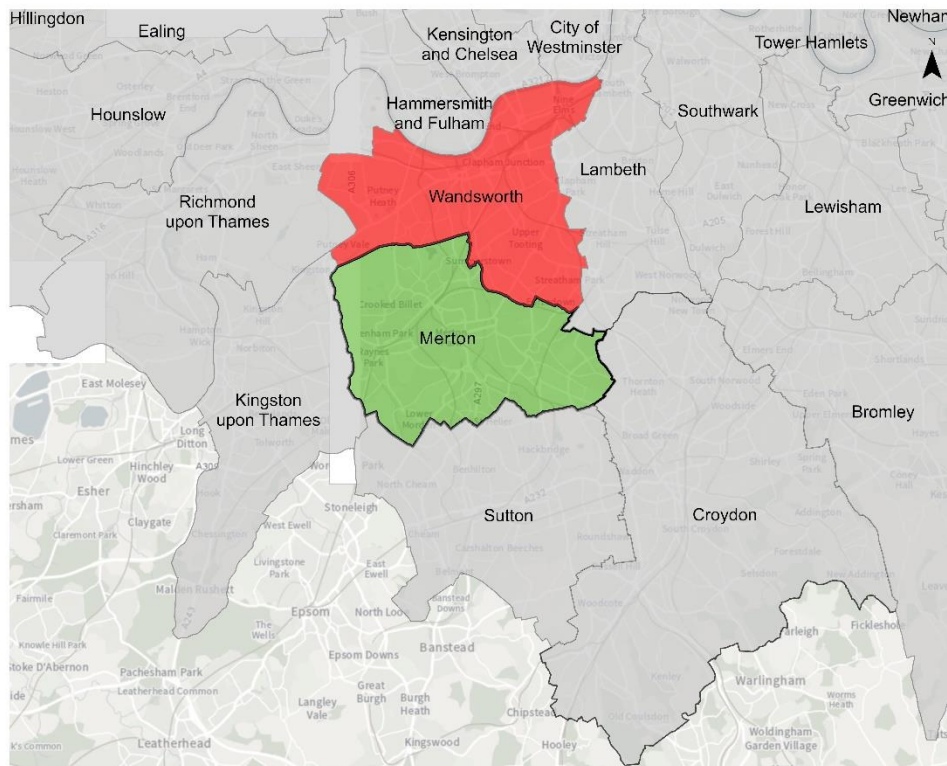
Position: Assistant Director, Environment and Community Services (Planning & Transport Strategy)

Date: 23 December 2021

4. Strategic Geography

- 4.1. This section sets out the factual position regarding cross boundary matters.
- 4.2. Sitting in south-west London:
 - 4.2.1. Merton is where inner meets outer London, bordered by the London boroughs of Wandsworth, Lambeth, Croydon, Sutton and the Royal Borough of Kingston upon Thames.
 - 4.2.2. Wandsworth is an inner London borough bordered by the London Boroughs of Lambeth, Merton and Richmond upon Thames and the Royal Borough of Kingston Upon Thames and, across the River Thames, the London Borough of Hammersmith and Fulham, Westminster City Council and the Royal Borough of Kensington and Chelsea.
- 4.3. The area shown in Map 1 has been identified as the strategic planning area for the purposes of the SCG.

Map 1: The geographic relationship between Wandsworth and Merton



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The London Plan

- 4.4. Within the wider London context, collaboration on many strategic issues that go beyond borough boundaries are addressed through the London Plan.
- 4.5. The London Plan is the spatial development strategy for London, produced by the Greater London Authority on behalf of the Mayor of London. The current plan was adopted in March 2021. Every London borough local plan must be in general conformity with the published 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. In a London context, collaboration on many strategic issues – such as the distribution of housing, identification of major growth areas, strategic infrastructure etc – are largely addressed through the London Plan, and the formal and informal arrangements that exist between boroughs to enable this to happen.

Strategic Agencies and Authorities in London

- 4.6. Transport for London (TfL) is the integrated transport authority responsible for the implementation of the Mayor's Transport Strategy (2018). The Strategy uses the 'Healthy Streets Approach', making health and personal experience the priority in planning the city. The Healthy Streets Approach is applied to the whole transport system to help create:
- a. Healthy streets and healthy people
 - b. A good public transport experience
 - c. New homes and jobs
- 4.7. The boroughs are required to work with TfL to support the implementation of the Mayor's Transport Strategy.
- 4.8. TfL runs the day-to-day operation of the city's public transport network (including London Buses, London Underground and Overground, Docklands Light Railway, TfL Rail and London Trams). Network Rail own, operate and develop London's rail infrastructure (to become Great British Railways from 2023).
- 4.9. The All London Green Grid (ALGG) 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. ALGG aims to promote and protect green and blue infrastructure (including rivers) in London. There are three areas in Wandsworth (the Arcadian Thames, Wandle Valley (shared with Merton) and Central London) and each area framework includes sections of the River Thames and/or River Wandle. Development on the riverside should have regard to the aims of the ALGG and the opportunities identified in the area frameworks.
- 4.10. Thames Water is the statutory water and sewerage undertaker for Merton and Wandsworth and is hence a specific consultation body in accordance with the Town & Country Planning (Local Development) Regulations 2012. Thames Water is helping to deliver the Thames Tideway Tunnel project which will be a new fifteen mile-long 'super sewer' running under the River Thames. Due for completion in 2024, the sewer will replace London's 150-year-old sewer network and prevent tens of millions of tonnes of sewage from polluting the River

Thames every year. Wandsworth has six large construction sites for the Thames Tideway Tunnel, including its main shaft site located in the riverside area of Kirtling Street, Nine Elms. The sites will be transformed into new public open spaces, including new promontories in the Thames at Putney embankment and Nine Elms (Heathwall Pumping Station), and opening up new areas of riverside walk in Nine Elms. In Merton, Sutton and East Surrey Water is also a statutory water and sewerage undertaker.

LB Merton

- 4.11. Merton is an outer London borough of around 37 km² situated to the south of Wandsworth. It also borders Croydon, Sutton, Kingston-upon-Thames and shares a small border with Lambeth. Key cross boundary issues between Merton and Wandsworth include the role and function of the Wandle Valley and the value of employment and industrial land uses in this area, travel routes between the two boroughs and beyond, the provision of acute healthcare by St George's Hospital located in Wandsworth that serves south London and other healthcare needs by NHS South West London Clinical Commissioning Group across six boroughs (including Merton and Wandsworth) and the management of Wimbledon Park, which is separated by the borough boundary. The All England Lawn Tennis Club is just within Merton, adjacent to Wimbledon Park, and the AFC Wimbledon Stadium lies just within Merton, to the south of Garrett Business Park Strategic Industrial Location in Wandsworth.

LB Wandsworth

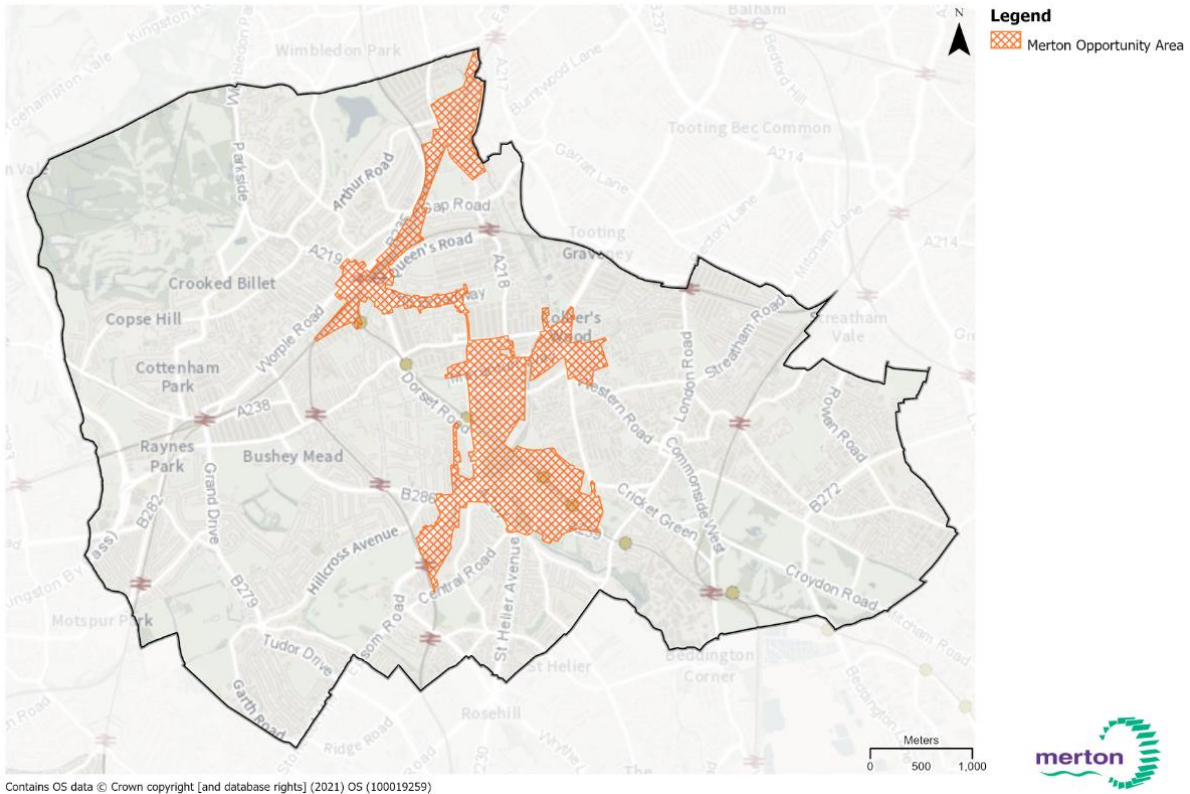
- 4.12. LB Wandsworth is an inner London borough of around 35km² area with a northern boundary on the River Thames between Nine Elms and Putney. Centred around Wandsworth Town and the Wandle Valley, the borough includes within it the town centres at Tooting, Balham, Clapham Junction, Wandsworth and Putney and the commons at Clapham, Tooting, Wandsworth and Putney / Wimbledon. LB Wandsworth shares significant boundaries with adjacent boroughs – Lambeth to the east (10km boundary), Merton to the south (10km) and Richmond to the west (8km). A relatively short boundary (c. 600m) exists with the Royal Borough of Kingston-upon-Thames in the south-west of the borough at Putney Vale.
- 4.13. Across the River Thames, Wandsworth shares a boundary with Hammersmith and Fulham (Putney to Battersea), Kensington and Chelsea (Battersea to Chelsea Bridge) and Westminster (Chelsea Bridge to Nine Elms). Eight bridges link the south to the north bank.

Shared Planning Matters

Opportunity Areas

- 4.14. The London Plan identifies areas that will see the most significant change. These are known as Opportunity Areas (OAs). Many OAs are already seeing significant development and have the potential to deliver a substantial amount of the new homes and jobs.
- 4.15. The London Plan 2021 identifies the Wimbledon – South Wimbledon – Colliers Wood Opportunity Area. Merton's draft Local Plan 2022 Chapter 1 proposes the Wimbledon – South Wimbledon – Colliers Wood Opportunity Area boundary as set out below. This borders Wandsworth to the north (Durnsford Road Strategic Industrial Location in Merton)

with the river Wandle acting as the borough boundary. Both boroughs agree there are no cross boundary issues identified.



- 4.16. There are two Opportunity Areas within Wandsworth. The Vauxhall, Nine Elms and Battersea Opportunity Area (VNEB OA) crosses the border between Wandsworth and Lambeth. The London Plan states that the VNEB OA has the potential to deliver greater levels of housing alongside employment than the other CAZ Opportunity Areas. In these areas, offices and other CAZ strategic functions may be given equal weight relative to new residential development. Most of the VNEB OA lies within the borough of Wandsworth and will be further connected to both Lambeth and Central London by the new underground stations on the Northern Line. The original masterplan set out two new centres to serve this new neighbourhood and beyond: a major new centre at Battersea Power Station and smaller centre in Lambeth at Vauxhall.
- 4.17. The Plan identifies the redevelopment of Clapham Junction Station as a key driver for growth and change. Improvement of the passenger experience by reconfiguration and modernisation of the station is needed. The Clapham Junction Opportunity Area has been identified to capitalise on both the longer term objectives which would be brought about through the planned Crossrail 2 route through Clapham Junction railway station, and shorter term objectives including the improvements to the station interchange and nearby mixed use development and regeneration opportunities which would allow for a co-ordinated approach for future development. This gives rise to the opportunity to improve the use of land around the station, contributing to the role of Clapham Junction as a major town centre. Crossrail 2 is currently on hold, though its development clearly has cross boundary issues for Wandsworth along its route. In the shorter term the Plan identifies the requirement to produce a masterplan to facilitate the delivery of improvements to the

station and new development in advance the potential future implementation of Crossrail 2. The OA, however, is entirely within Wandsworth and similar cross boundary issues are not anticipated.

Strategic Areas for Regeneration

- 4.18. As outlined by London Plan policy SD10, there are parts of London where the impacts of inequality and causes of deprivation are particularly concentrated. Based on the Index of Multiple Deprivation (IMD), many of the city's neighbourhoods lie within the 20 per cent most deprived areas in England. The London Plan identifies these neighbourhoods as Strategic Areas for Regeneration (SARS).
- 4.19. The London Plan 2021 identifies Strategic Areas for Regeneration in Merton around the Phipps Bridge, Pollards Hill and Mitcham town centre, some distance from the borough boundaries. Cross boundary issues are not identified.

Housing Market Area

- 4.20. Whilst Greater London is considered to be the strategic housing market area for the purposes of the London Plan and its SHLAA, the more detailed assessment at a local level identifies five sub-regional areas (North, East, West, South and Central). Merton is identified within the South area along with immediate neighbours, Kingston, Wandsworth, Richmond and nearby boroughs of Sutton and Croydon.

Town and Local Centres

- 4.21. The London Plan identifies a hierarchy of the city's larger town centres, recognising the different size, draw and function of them.
- 4.21.1. The Merton Local Plan identifies one Major Centre (Wimbledon), three District Centres (Colliers Wood, Mitcham and Morden) and local centres and neighbourhood parades. Colliers Wood is proposed as a new District Centre in Merton's Local Plan. There are not considered to be any cross boundary issues arising from this proposal.
- 4.21.2. The Wandsworth Local Plan identifies five town centres – Wandsworth Town, Putney, Balham, Clapham Junction and Tooting – and beneath this it also identifies local centres and important local parades within the borough (The London Plan identifies Battersea Power Station as a future CAZ retail cluster).
- 4.22. Between boroughs, town centres and parades can be shared by virtue of them crossing the borough boundary. There no instances of this in Merton, but there are two instances of this in Wandsworth, as follows:
- Lavender Hill / Queenstown Road local centre (Lambeth)
 - Clapham South local centre (Lambeth)

Neighbourhood Planning

- 4.23. There is one designated neighbourhood planning area in Wandsworth. The designated Tooting Bec and Broadway Neighbourhood Area lies on the boundary with **Merton**, and includes two Lambeth owned cemeteries (Streatham Cemetery and Lambeth Cemetery).
- 4.24. An application for a neighbourhood forum area in Wimbledon (**Merton**) was refused in July 2021 but is likely to emerge again. This area would have had a boundary with Wandsworth and, at Lambeth Cemetery, a boundary with the Tooting Bec and Broadway Neighbourhood Forum.

Transport

- 4.25. Main roads that cross the border between Merton and Wandsworth and surrounding boroughs:

London Distributor Road:

- A216 (Mitcham Lane) (Lambeth – Wandsworth – Merton)

TfL Road Network:

- A24 (Lambeth – Wandsworth – Merton)
- A3 (Lambeth – Wandsworth – Merton – Kingston)
- A217 (London Road) (Merton – Wandsworth – Hammersmith and Fulham)
- A218 (Durnsford Road) (Merton – Wandsworth)
- A219 (Wimbledon Park Side / Putney High Street) (Merton – Wandsworth – Hammersmith and Fulham)

Overground rail lines that cross the border between Wandsworth and surrounding boroughs:

- Wimbledon loop (Central London – Streatham (Lambeth) – Tooting (Wandsworth) – Haydon's Road, Wimbledon, South Merton, Morden South (Merton) - Sutton
- Earlsfield – Wimbledon Raynes Park (South Western) (Merton)

Underground rail lines that cross border:

- Northern Line (Lambeth, Wandsworth and Merton)
- District Line (Hammersmith and Fulham, Wandsworth and Merton)

Flooding / Critical Drainage Areas

(a) Flood Risk

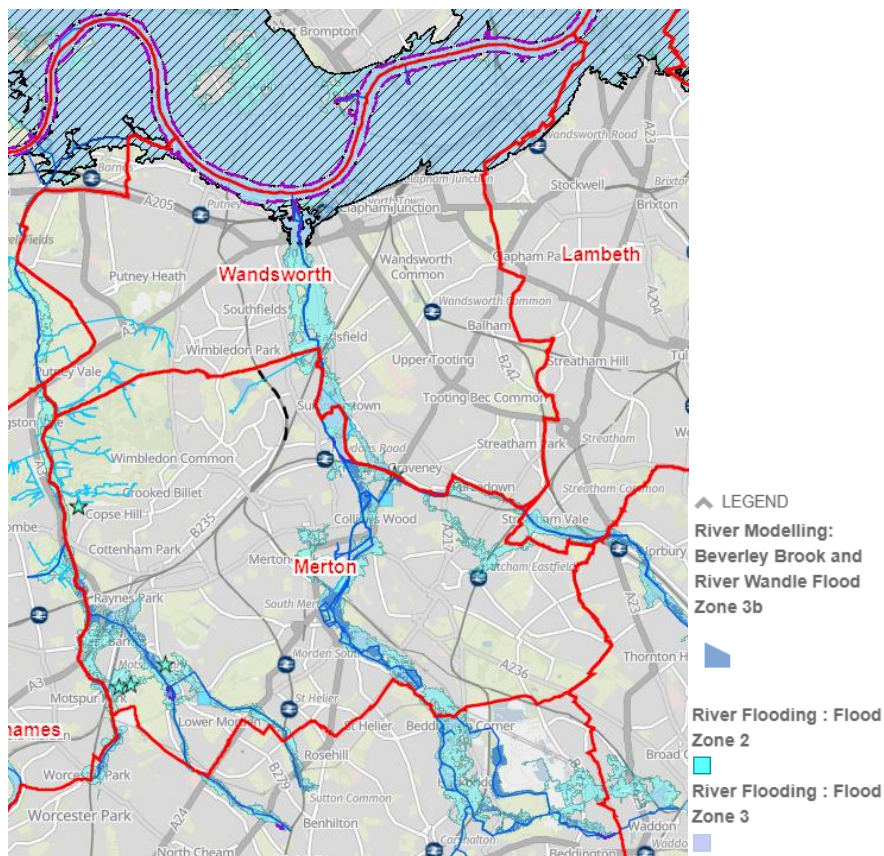
- 4.26. The National Planning Policy Framework (NPPF) and associated Planning Practice Guidance for Flood Risk and Coastal Change (PPG) set out the active role Local Planning Authorities (LPAs) should take to ensure that flood risk is understood and managed effectively and sustainably throughout all stages of the planning process. The NPPF outlines that Local Plans should be supported by a Strategic Flood Risk Assessment (SFRA) and LPAs should use the findings to inform strategic land use planning.
- 4.27. Merton and Wandsworth Councils have produced an updated joint Level 1 (November 2020) and Level 2 (February 2021) Strategic Flood Risk Assessment (SFRA).

4.28. The Level 1 Merton and Wandsworth SFRA has collated and analysed the most up to date available flood risk data for all sources of flooding to provide an overview of flood risk across the study area. This has been used by both councils to inform the preparation of their Local Plans, including the application of the Sequential Test to site allocations.

The key updates to this revised Level 1 SFRA (2020) include:

- River Wandle Climate Change Modelling (August 2017)
- Online Flood Risk Mapping (to Support the Level 1 SFRA)
- Areas at risk of perched groundwater
- Further commentary on areas to safeguard for flood risk management, the cumulative impact of development, and opportunities to reduce the causes and impacts of flooding.

4.29. There are three fluvial flood zones as defined by the Environment Agency (EA); Flood Zone 1, 2 and 3. These areas have been defined following a national scale modelling project for the EA and are regularly updated using recorded flood extents and local detailed modelling. The flood zones are based on the likelihood of an area flooding, with Flood Zone 1 areas least likely to flood and Flood Zone 3 areas more likely to flood. The map below shows the flood extents that cross adjoining boundaries.



4.30. 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. The Thames tidal defences also include tidal walls and embankments along the banks of the River

Thames. Should they fail or become breached, the area most at risk of flooding would be in the north of the borough, but this could also impact on the surrounding neighbourhoods. The Environment Agency holds tidal breach modelling. This is also detailed within Wandsworth's Strategic Flooding Risk Assessment (2020) Level 1 and 2.

- 4.31. In 2019 the Environment Agency started its first full review and update of the Thames Estuary 2100 Plan (2012). The Plan sets out the measures that require implementing to maintain adequate flood risk protection from the River Thames by the year 2100. Wandsworth is identified within Action Zone 1 (West London). The Plan outlines a number of recommendations to mitigate flood risk within the Central Zone, including to maintain, enhance or replace, the river defence walls and active structures through central London over the 25 years of the plan from 2012 to 2035, and then 2035 to 2050. Within the West Zone, the Plan outlines several recommendations including to agree a programme for putting in place within 25 years, alternative measures for managing fluvial flood risk in the west London tidal area. The Plan advises that by 2065, the existing flood defences of the river wall will need to be raised by 0.5m and a further 0.5 by 2100.

(b) Critical Drainage Areas

- 4.32. 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 of local infrastructure.
- 4.33. 11 CDAs were identified across the borough as part of the Surface Water Management Plan.

CDA ID	CDA Name	CDA ID	CDA Name
Group7_014	Putney Heath	Group7_020	South Balham
Group7_015	King Georges Park	Group7_021	Clapham Junction South
Group7_016	Trinity Road	Group7_022	Clapham Junction
Group7_017	St Georges Hospital	Group7_023	Lavender Hill
Group7_018	Summerstown	Group7_024	Tooting Bec

Provision of energy (including heat)

- 4.34. The 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 within London (see Policy SI3, Energy Infrastructure). It states that development plans should identify the need, and suitable sites for, any necessary infrastructure requirements such as energy centres, energy storage and upgrades to existing infrastructure. Development plans should also identify existing, and propose locations for, heating and cooling networks.

- 4.35. The Mayor has established the London Heat Map as a tool to help this process, and has identified Heat Network Priority Areas, which can be used to where the heat density is sufficient for heat networks to provide a competitive solution for heat provision. Wandsworth is included within a Heat Network Priority Area with central **Richmond**, northern **Merton** and **Lambeth**.

Green infrastructure

- 4.36. Metropolitan Open Land that abuts or crosses the borough boundary into surrounding boroughs:
- Clapham Common (Lambeth and Wandsworth)
 - Tooting Bec and Graveney Commons (Lambeth and Wandsworth)
 - Lambeth Cemetery (Merton and Wandsworth)
 - Wimbledon Park (Merton and Wandsworth)
 - Wimbledon Common and Putney Heath (Wandsworth, Kingston and Merton)
 - Roehampton Club / Bank of England Sports Ground (Richmond and Wandsworth)
 - Putney Lower Common (Richmond and Wandsworth)
 - Mitcham Common (Merton, Croydon and Sutton)
- 4.37. Wimbledon Park is also a defined Historic Park and Garden, and Wimbledon Common is a Special Area of Conservation and Site of Special Scientific Interest. With the exception of Wimbledon Park, each of these sites also holds a designation or protection for their biodiversity interest.
- 4.38. Leader's Gardens (**Richmond**) and Heathbrook Park (**Lambeth**) are larger protected open spaces lying on or across the borough boundaries with Wandsworth.

Views, heritage, design and conservation

- 4.39. Wimbledon Park is a Grade II listed Historic Park and Garden, currently on the Historic England "at risk" register. The northern part of Wimbledon Park is within Wandsworth, with the majority across the boundary to the south, in Merton.
- 4.40. Two conservation areas cross the boundary of, or have a border with each other:
- Wimbledon North (Wandsworth) which abuts Wimbledon North (Merton);
 - Bathgate Road (Wandsworth) which abuts Bathgate Road CA (Merton).

5. Strategic Matters

- 5.1. This section documents key strategic matters covered in Merton's and Wandsworth's Local Plans that are considered to be of cross-boundary significance arising from the potential impacts of the Local Plan Review. It summarises where agreement has or has not been reached with relevant key partners to which the issue relates.

- 5.2. The cross-boundary impacts of borough policies in neighbouring authorities' local plans will be addressed through separate SCG produced by the relevant local authority.
- 5.3. Each borough's Duty to Co-operate Statement also provides further details of how the Local Plan has been informed by ongoing engagement with key partners, including those that are not party to this SCG.

Housing

Housing Delivery and affordable housing

- 5.4. The delivery of new and affordable housing is one of the largest strategic issues London faces. Through the London Plan and in line with Planning Practice Guidance¹, the Mayor of London sets housing targets for each local planning authority, based on evidence of housing need and development capacity across the capital. Through their own local plans, authorities must then plan to meet or exceed London Plan targets to ensure they are in general conformity with the London Plan.
- 5.5. The analysis in the Local Housing Need Assessment (2020) demonstrates that Wandsworth has an on-going relationship with the boroughs that make up the London South West Sub-Regional housing market, which was as defined in the 2012 Wandsworth Strategic Housing Market Assessment.
- 5.6. Wandsworth's Local Plan will seek to deliver at least 1,950 homes per year (against a target set by the London Plan of 19,500 homes between 2019/20 and 2028/29), and Merton's Local Plan will seek to deliver at least 918 homes per year (9,180 homes over the London Plan period) albeit in a stepped annual target. There is identified capacity to meet this requirement for the first ten years of the Local Plan period for both boroughs. In accordance with the London Plan, the Local Plan identifies a requirement for the entire Plan period and capacity to meet this target, acknowledging that the London Plan target will change once it is updated within around 5 years' time, with these requirements to be included in a future revision to the Local Plan. The Local Plan housing target is lower than the objectively assessed local housing need for both boroughs, however a comprehensive review of land and sites available for development (including large, small and windfall sites) indicated that there is insufficient capacity to meet the objectively assessed local housing need. All options have been thoroughly explored with regards to meeting as much of the objectively assessed housing need as possible, subject to environmental constraints.
- 5.7. All local planning authorities that are part of this SCG have fed into the London Plan figures – either expressing their support or objection to the new figures, based on a localised understanding of development capacity.
 - Wandsworth and Merton agree that they can meet or exceed the total numerical housing target assigned to them by the Mayor of London in the published-London Plan 2021, within their own borders, thus it is not considered that it constitutes a cross-boundary issue.

¹ Paragraph: 034 Reference ID: 2a-034-20191216

- In 2019, during the drafting of the London Plan when the draft London Plan target for Merton proposed as 13,280 homes per decade, Merton asked Wandsworth if it could assist with the housing requirement. Wandsworth stated that it was unable to assist due to insufficient housing capacity. However Merton can now meet its 10 year target within its own borders so this is no longer considered to be a cross boundary issue.

- 5.8. Wandsworth's Local Housing Need Assessment (LHNA) identifies a net need for 2,327 affordable rented and 1,248 affordable home ownership dwellings per annum to be provided over the plan period.
- 5.9. Merton's Strategic Housing Needs Assessment 2019 identifies a need for 878 - 1,084 homes per annum in social / affordable rented sector and a need for 786 - 933 in affordable home ownership sector.
- 5.10. The level of need is significant, and for that reason Wandsworth's proposed affordable housing policy (LP23, Reg.19 version) and Merton's proposed affordable housing policy (H11.1, Reg.19 version) both set the aspiration to secure 50% of all new homes to be affordable, in line with the intent of the London Plan 2021.
- 5.11. Both new Local Plans will seek to deliver a range of housing types, including Build to Rent, housing for students and the elderly. It is not believed that any of these forms of accommodation, or the provision of affordable homes, leads to strategic cross-boundary issues with the neighbouring boroughs.

Gypsies and Travellers

- 5.12. Wandsworth has a long-established Traveller site, which currently accommodates 11 residential pitches, one of which is vacant. The Gypsy and Traveller Accommodation Needs Assessment (2019) found that there is no evidenced requirement or need for additional pitches to be provided on the existing site or elsewhere in the borough. If demand exceeds supply in the future, the Council will actively explore options to identify an additional site, in accordance with the Policy LP32 (Traveller Accommodation).
- 5.13. This has not been identified as a strategic or cross-boundary issue.

Employment land

- 5.14. **Wandsworth** updated the Employment Land and Premises Study (ELPS) in 2020, which suggests there is demand for office floorspace (22,500 sqm) and industrial and waste land (up to 8.6ha) in excess of supply. It is noted that the ELPS is based on economic forecasting data derived from before the pandemic, and the impact upon changes in work patterns is likely to have a significant impact on office, and other commercial and industrial, floorspace. The Local Plan therefore takes a protective approach.
- 5.15. The draft Wandsworth Local Plan continues the approach of the Local Plan Employment and Industry Document (EID, 2018), in that it distinguishes between two office markets: the CAZ in Nine Elms and the local / sub-regional market in the rest of the borough. It also promotes the concept of the Battersea Design and Technology Quarter (BDTQ), located south of

Battersea Power Station in Queenstown Road / Battersea Strategic Industrial Location (SIL).
In addition:

- In line with London Plan Policy E5, Wandsworth has designated 'Summerstown' as SIL in the draft Local Plan. This area of employment activity straddles the boundary with **Merton**. This replaces the previous designation as a Locally Significant Industrial Area (LSIA); the borough equivalent of the Locally Significant Industrial Sites (LSIS) in the London Plan. **Merton** highlight that it has a high demand for industrial land and plans to protect the SIL sites within the borough, and is therefore supportive of this approach.

Affordable Workspace

- 5.16. Wandsworth's Local Plan includes an affordable workspace policy seeking contributions to affordable, flexible and managed workspace. Developments of over 1,000 sqm must provide either a proportion of 'open workspace' equivalent to 10% of the gross economic floorspace, or a proportion of economic floorspace at an affordable rent below market rent, in perpetuity, subject to scheme viability. This is spatially differentiated between sites in the VNEB Opportunity Area and the remainder of the borough.
- 5.17. This has not been identified as a strategic or cross-boundary issue.

Town centres and retail

- 5.18. **Wandsworth** updated the Retail Needs Assessment in 2020, and it identifies that there is no clear need to identify or plan for an increase in retail and food / beverage floorspace over the majority (up to 2035) of the Local Plan period. It should be noted that this study was based on data largely dating from before the Coronavirus pandemic.
- 5.19. Both Wandsworth and Merton's Local Plans set out a new approach to retail in response to legislative changes (particularly in respect of the new Class E), both maintain a hierarchical town centre approach as a preferred strategy despite new changes to permitted development from Class E to Class C3 that could undermine both town centres and such an approach. Merton plans to designate Colliers Wood as a district centre, despite it not being recognised as such in the London Plan; this is not considered to impact on Wandsworth's centres.
- 5.20. Wandsworth and Merton recognise the potential for investment in existing centres (Clapham Junction / Tooting or Balham, Wimbledon) if Crossrail 2 is realised.

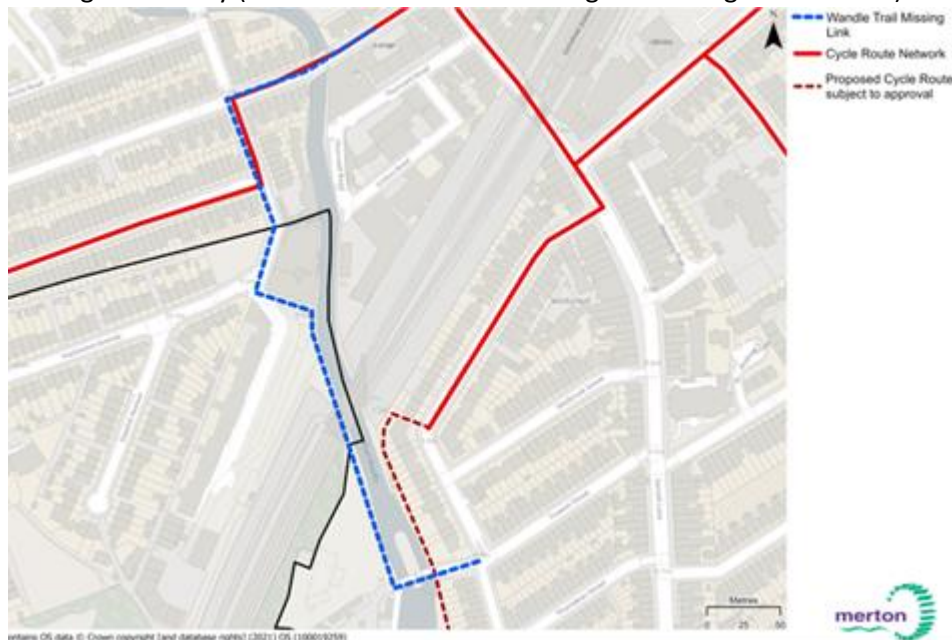
Transport infrastructure

- 5.21. The Wandsworth Local Plan advocates support for the main ongoing infrastructure projects in the borough, including the Thames Tideway Tunnel and Crossrail 2. Wandsworth is committed to working on these projects with Transport for London and neighbouring boroughs. Two new bridges have been proposed for the Thames, these being the Nine Elms to Pimlico bridge (Wandsworth to Westminster) and the Cremorne (Diamond Jubilee) Bridge (Wandsworth to Hammersmith and Fulham). The Thames Tideway project is due for completion in 2024/2025.
- 5.22. For Crossrail 2, both Merton's and Wandsworth's Local Plans recognise that the project may not come forward during the lifetime of either local plan (having been suspended in

November 2020). Wandsworth’s Local Plan therefore incorporates a ‘fallback’ option, that major development sites – particularly in Clapham Junction – would still be suitable for redevelopment even without this infrastructure, albeit on a likely reduced scale. Tooting is the preferred location for a station on the Crossrail 2 project. This would necessitate the comprehensive redevelopment of Tooting town centre (in particular the area around the current station). The Area Strategy for Tooting emphasises the protection of the area, including the retention (or reprovision) of the markets. Being close to Merton, this is considered a cross-boundary issue and Merton supports it in principle.

5.23. Finally, Merton has highlighted an upcoming S106 project with cross boundary implications, noting it would be good to be identified within the Wandsworth Draft Local Plan and for both boroughs to liaise to ensure consistent mapping. This project related to the Wandle Trail, known as the ‘missing link’, where it deviates from the riverside west of Earlsfield’s centre. Wandsworth and Merton officers are already in contact on this.

5.24. Merton’s Policies Map proposes the following link within the Merton borough boundary and for the purposes of co-operation, has illustrated the route below crossing into Wandsworth’s borough boundary (with the black lines indicating the borough boundaries)



Telecommunications and digital infrastructure

5.25. Not identified as a strategic or cross-boundary issue with any one specific borough. National Grid is building the London Power Tunnels 2 project, 33km of underground cabling from Wimbledon to Bexley via Wandsworth, Lambeth, Southwark, Lewisham and Greenwich. The project is under construction and National Grid has already compulsory purchased the necessary land. The first circuit from Wimbledon substation in Merton to New Cross in Lewisham is due to be complete in 2025. Although it connects to the large National Grid substation in Merton, the tunnelling work and shafts for the boring machine to exit will be located in Wandsworth within the Garrett Mills business park. Although this is a cross boundary issue, as the project is underway (and underground) it is not considered to raise issues for either Local Plan.

Waste management

- 5.26. Wandsworth has published a Waste Technical Study, (Wandsworth Local Plan Review: Waste Evidence Base, completed in 2020), which is available online. The overall summary position of the report is that waste need, including the borough's apportionment target will be met within the borough through capacity at existing sites and directing new waste facilities to safeguarded industrial areas to make up the shortfall.
- 5.27. A Duty to Cooperate Report on Waste Exports was published in May 2021. The Report provides an audit and analysis of the issues raised during the duty to cooperate engagement on waste exports January – March 2021, which formed part of Wandsworth's draft Local Plan Regulation 18 consultation. Wandsworth has identified sixteen waste planning authorities (or groups of WPAs) who receive 'strategic' amounts of waste exports from the Borough (i.e. an amount of waste over certain thresholds which have been agreed by waste planning authorities across the wider south east). Wandsworth has engaged with each of these authorities, or groups of authorities, to establish if there are any planning reasons why similar waste exports from the Borough cannot continue over the plan period.
- 5.28. As an outcome of this ongoing process, Wandsworth will work towards preparing Statements of Common Ground with each of the WPAs who consider waste exported from Wandsworth to their area to be a strategic issue. This will be completed independently from this SCG, and will include neighbouring Merton and Hammersmith and Fulham, alongside:
- London Borough of Havering
 - Hertfordshire County Council
 - Kent County Council
 - Medway Council
 - Old Oak and Park Royal Development Corporation
 - Surrey County Council
 - Thurrock Council
- 5.29. Together with the neighbouring boroughs of Croydon, Kingston upon Thames and Sutton, Merton prepared and adopted the joint development plan document, the South London Waste Plan in 2012 and have nearly finalised its review, the South London Waste Plan 2022. The South London Waste Plan 2022 was submitted to the Secretary of State in February 2021, the public hearing element of the examination in public was held in September 2021 and at the time of writing the four boroughs are preparing for a seven week public consultation on the post hearing modifications. Duty to co-operate on waste planning matters was considered as part of the preparation of the South London Waste Plan 2022

Water supply and wastewater management

- 5.30. Wandsworth continues to support the implementation of the Thames Tideway Tunnel, alongside neighbouring authorities. No strategic or cross borough issues have been identified with Wandsworth and Merton.

Climate change adaptation, particularly flood risk

- 5.31. Merton and Wandsworth have a shared strategic flood risk assessment as identified above. Both boroughs are committed to continuing this joint work.

Climate change mitigation

- 5.32. Wandsworth and Merton, like many, declared a Climate Change Emergency in 2019, and in response has developed the Wandsworth Energy and Sustainability Strategy (WESS) and Action Plan and the Merton Climate Strategy and Action Plan. Both are cross-cutting strategies on addressing climate change – which focuses both on internal and external actions, including carbon neutrality as an organisation by 2030 and zero carbon by 2050.
- 5.33. Merton is introducing carbon offset targets for minor developments whereas Wandsworth has followed the targets identified in the London Plan.

Energy infrastructure

- 5.34. Wandsworth's Draft Local Plan continues to promote decentralised energy networks. There are two networks within Nine Elms: the Embassy Quarter Heating Network (EQHN) and the Battersea Power Station Heating Network. These have a relationship with both Lambeth and Westminster, though this issue is not identified as a strategic or cross-boundary issue with Merton and Wandsworth.

Provision of minerals

- 5.35. Not identified as a strategic or cross-boundary issue between Merton and Wandsworth.

Health care

- 5.36. The NHS South West London Clinical Commissioning Group is responsible for planning, commissioning and buying health services for people living and working in south west London. The CCG serves around 1.5 million people living within the six boroughs of Wandsworth, Kingston, Merton, Richmond, Sutton and Croydon. The CCG is responsible for primary care (the services received at a GP practice), hospital treatment, rehabilitation services, urgent and emergency care, community health services, mental health and learning disability services. Strategic cooperation already takes place.
- 5.37. Wandsworth is in the process of updating the Infrastructure Delivery Plan (IDP), which will be published alongside the Regulation 19 version of the Local Plan. The borough can meet its projected health needs. A new Health Centre at Sleaford Street, secured as part of Battersea Power Station Phase 4a and funding agreement with NHS Property Services, will provide new primary health care facilities to support the predicted new population of c.34,700 and the existing residents, thereby contributing to the health and well-being of local communities. In addition, the Council will work in partnership with the NHS to deliver additional health care at Nine Elms Square (see Local Plan policy PM3).
- 5.38. Merton Council has published its Infrastructure Delivery Plan 2022, which is informed by the NHS CCG Merton Borough Estates Strategy. This sets out the projected health needs in Merton. As stated above, Merton and Wandsworth share the NHS South West London CCG with four other boroughs

Schools and education

- 5.39. The greatest pressure on educational provision in Wandsworth is in Queenstown ward in the north east of the borough. Here, the Wandsworth Local Plan commits to bringing forward a new two-form entry primary school at the identified site of Plot C1, Nine Elms Parkside in time to meet the need arising from development and ensure the provision is made for

potential expansion in future years. The new school in Nine Elms is being developed in partnership with Lambeth and is not identified as a strategic or cross-boundary issue. Beyond this additional provision, Wandsworth considers itself able to meet its school needs without further school development.

- 5.40. Merton has planned for increased school places and in addition to the expansion of primary schools that took place from 2007 to 2015, a new secondary school was opened in 2018 (Harris Wimbledon) and in 2020 moved to its new site in South Wimbledon. As identified in Merton's Infrastructure Delivery Plan, there is an increasing need for school places for children with additional needs; Merton Council has expanded the existing special needs school at Cricket Green and proposes additional places at Whatley Avenue towards the west of the borough.
- 5.41. There is school places movement across borough boundaries but this issue is not identified as a strategic or cross-boundary issue beyond what is referred to above.

Community and cultural infrastructure

- 5.42. Wandsworth has adopted a borough-wide Arts and Culture Strategy and its aims and objectives have been incorporated into the Local Plan. This is written to complement other arts and cultural initiatives around Wandsworth's neighbourhoods, including in the Vauxhall, Nine Elms and Battersea area (where there is an existing area Cultural Strategy) and the GLA / Port of London Authority River Thames Cultural Vision.
- 5.43. Merton Council has published a number of strategies to promote different aspects of community and cultural infrastructure including Merton's Community Plan 2020-2026 (with partners) and Merton's Heritage Strategy 2021-2025
- 5.44. This has not been identified as a strategic or cross-boundary issue.

Natural environment and green infrastructure

- 5.45. Wandsworth has undertaken an update of the borough's Open Space Strategy. The study provides the basis for the protective approach taken in the Wandsworth Local Plan.
- 5.46. The Local Plan also incorporates an Urban Greening Factor (UGF), which relies on the values established in the adopted London Plan, rather than a local formula (see Policy G5 of the London Plan and LP57 of the Wandsworth Local Plan). Policy LP57 commits to keeping this under review.
- 5.47. Merton has published an Open Space and Green Infrastructure Study 2020 which has informed the Local Plan policies, site designations and Policies Map amendments
- 5.48. Between Merton and Wandsworth, the proposed expansion of the All England Lawn Tennis Club into the adjacent Wimbledon Park (mostly located in Merton and a site allocation Wi3 in Merton's Local Plan, partly located in Wandsworth) presents shared issues for the two boroughs in respect of the holding of the annual Championships, heritage, travel and open space issues. This is being dealt with through the planning application process and a cross-boundary planning application has been submitted to both boroughs in their roles as Local Planning Authorities as the development straddles the borough boundary (reference 21/P2900 in Merton; reference 2021/3609 in Wandsworth).

- 5.49. Wandsworth Council considers that Merton's proposed site allocation Wi3 will need to ensure that it complies with the NPPF, in that it is recognised that the allocation is on land designated as Metropolitan Open Land (MOL) within which development may only occur by exception and subject to the demonstration of 'very special circumstances' to clearly outweigh any harm to MOL and any other harm. Whilst outdoor sport may be appropriate development (NPPF 2021, para 149) this is only providing the facilities do not impact on openness and the purposes of land being designated as MOL. To address this, Merton will propose amendments to the text within Site Allocation Wi3 of the Stage 3 Reg. 19 Plan (July 2021) as part of the examination process. Paragraph 7 of the Site Description (stating, 'The golf course is part of a Capability Brown designed Grade II* Registered Park and Garden (along with Wimbledon Park and the Wimbledon Club) and is designated as Metropolitan Open Land, a Site of Importance for Nature Conservation, designated Open Space and within a Conservation Area. Any tennis related development on the golf course will need to respond to these sensitive designations') will be moved to the Design and Accessibility Guidance section.
- 5.50. Wimbledon and Putney Common in Merton and Wandsworth borders Kingston, and it is recognised that there is scope for cross-borough alignment. In Wandsworth and Merton, the approach to the protection and enhancement for these types of open space has not changed and the findings from each borough's Open Space Study and the Playing Pitch Strategy can be shared upon request for Wandsworth and are available online in Merton. Both boroughs agree to continue supporting green links and green chains that cross over the boundary.

Historic environment

- 5.51. The Wandsworth Local Plan Policy LP3 (The Historic Environment) seeks to conserve and enhance the significance, character and appearance of the borough's historic environment.
- 5.52. Whilst there are a number of shared assets of heritage and conservation importance between Wandsworth and Merton (see section 4, above and section 5 reference to the All England Lawn Tennis Club planning application at Wimbledon Park), this has not been identified as a strategic or cross-boundary issue.

Tall buildings and built environment

- 5.53. Wandsworth Council has undertaken an Urban Design Study (UDS), to develop a better understanding of the values, character and sensitivity of different parts of the borough and to enable a design-led approach to housing capacity on allocated sites. As part of the work, an assessment of the scope for, and impact of, tall buildings has been undertaken which will both ensure compliance with London Plan policy and contribute to the understanding of the capacity of such buildings to meet development needs. Tall buildings clearly have an impact on the built environment both locally and more strategically, dependent on where they are located. The tall building policy identifies a local definition for tall and mid-rise buildings (informed by the local prevailing height) and identifies broad locations across the borough where tall buildings may be appropriate.
- 5.54. The work on the approach to tall buildings has been concluded between the consultation on the Regulation 18 plan, and the publication of the Regulation 19 plan, and has been completed to inform the latter. The assessment of character and sensitivity, alongside an assessment of the likelihood for change and the availability of opportunity gives rise to a

composite map which sets out those areas where tall buildings could be acceptable, and more detailed work within each of these areas begins to map out heights that might be appropriate.

- 5.55. The strategy for tall buildings focuses on the Nine Elms Opportunity Area, the five town centres (Balham, Clapham Junction, Putney, Tooting and Wandsworth), the River Thames frontage through Wandsworth and Battersea and known areas with emerging masterplans or major planning applications. The principal issues for neighbouring boroughs will occur along the River Thames (particularly in respect of key views and riverside impact) and at VNEB. In this respect, Hammersmith and Fulham, Kensington and Chelsea, Westminster and Lambeth are likely to have the greater interest in policy direction; for Merton, Richmond and Kingston, the possible impact is less immediate.
- 5.56. Likewise, several locations along Wandsworth's boundaries with Lambeth, Merton and Richmond have been identified as zones appropriate for tall and mid-rise buildings.. Although, tall buildings in these locations are likely to impact on views from these boroughs, it is not considered that the impact would be unacceptable given that proposals will need to comply with the criteria set out in the policy. These authorities have highlighted that they would consider the tall buildings policies as part of the Local Plan consultation, in which neither borough made further comments.
- 5.57. Merton has undertaken a borough character study 2021 which includes a chapter on taller buildings and has informed Merton's strategy for taller buildings, as set out in Merton's Local Plan. Taller buildings in Merton are permitted in specific parts of Colliers Wood, Morden and Wimbledon town centres and on specific site allocations. In all other cases Merton follows the London Plan 2021 approach of defining taller buildings as no taller than 6 storeys across the rest of the borough. The GLA's response to Regulation 19 of Merton's Local Plan proposed some amendments to ensure this was clear in both the policies and on maps in order to bring Merton's draft Local Plan into line with the London Plan 2021.

6. Governance arrangements

- 6.1. Requirements for signing documents differ between Local Authorities depending on their structure. It will be for each body to decide who is the appropriate person to sign the statement.

7. Timetable for agreement, review, and update

- 7.1. This statement has been informed by on-going engagement between the parties and has been informed by various evidence base documents. In addition to Duty to Cooperate meetings, the Council also regularly partakes in the Association of London Borough Planning Officer (ALBPO) meetings.
- 7.2. This SCG 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.
- 7.3. As this statement focuses on issues of relevance to Wandsworth's Draft Local Plan, post examination will only need further updating once work commences on any future revisions

to the Local Plan. Ongoing collaboration between partners will continue through regular meetings on a one to one basis and through attendance at group meetings where cross boundary issues are discussed.