Statement of Common Ground - Merton and Croydon Councils

Introduction

- 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 Croydon's Regulation 19 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.
- 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.
- 3. This statement of common ground between Merton and Croydon demonstrates how effective and on-going joint working has informed strategic policy-making through the whole review of Merton's Local Plan (<u>submitted December 2021</u>) and the partial review of Croydon's Local Plan which at the time of writing had reached the (<u>Regulation 19 publication January February 2022</u>) stage, to meet the requirements of the Duty to Cooperate.
- 4. In this statement the parties involved are:
 - London Borough of Croydon (Croydon)
 - London Borough of Merton (Merton)

Strategic Geography

5. The map below shows the geographical relationship between the boroughs as well as the South London Waste Plan (joint DPD) authorities.



- 6. Croydon and Merton are both outer London boroughs as defined in the London planning process (Annex 2 of the 2021 London Plan). They both have boundaries to Sutton Council and in addition:
 - Croydon has a boundary to the south to Surrey and the local planning authorities of Surrey County Council, Mole Valley, Reigate & Banstead and Tandridge.
 - Merton has a boundary to the Royal Borough of Kingston-upon-Thames, London boroughs of Wandsworth and Lambeth.

Strategic co-operation

Pan London work

- 7. Within the wider London context, collaboration on many strategic issues that go beyond borough boundaries occurs through the preparation and monitoring of the Spatial Development Strategy for London; currently the London Plan 2021.
- 8. 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's local plan must be in general conformity with the published London Plan.
- 9. 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.
- 10. Transport for London (TfL) is the integrated transport authority responsible for the implementation of the Mayor's Transport Strategy (2018). The boroughs are required to work with TfL to support the implementation of the Mayor's Transport Strategy.
- 11. 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.
- 12. 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 and divides London into 11 Green Grid areas. The Wandle Valley Green Grid area covers parts of Merton, Croydon, Sutton and Wandsworth. Merton is also covered by the Arcadian Thames area (shared with other boroughs including Kingston, Richmond and Wandsworth) and Croydon also contains the London's Downlands area (shared with

- other boroughs including Bromley and Sutton). Within Croydon there is the recently created South London National Nature Reserve.
- 13. Thames Water is the statutory water and sewerage undertaker for Merton, Wandsworth as well as Croydon and is hence a specific consultation body in accordance with the Town & Country Planning (Local Development) Regulations 2012. In Merton and Croydon, Sutton and East Surrey Water is also a statutory water and sewerage undertaker.
- 14. An extensive network of formal and informal routes for co-operation exists which Merton and Croydon participate in on plan-making issues. These include:
 - Working with the Greater London Authority on evidence and consultation for the London Plan. This includes contribution to the pan-London Strategic Housing Land Availability Assessments
 - Continuous monitoring of all residential development in London and other types of commercial and strategic development via the London Development Database
 - Creating and delivering the Local Implementation Plans for the Mayor's Transport Strategy
 - Participating in opportunities for co-ordination and co-operation such as the Association of London Borough's Planning Officers, Urban Design London, London Councils
 - Merton and Croydon are both part of the South London Partnership of five south London boroughs working together on joint strategies and projects to promote south London's economy, infrastructure and living.
 - Delivering infrastructure jointly, for example working with Transport for London on maintaining and improving the tram services from Croydon to Wimbledon, working together as part of the South London Waste Partnership (Merton, Croydon, Sutton and Kingston).

Strategic planning issues considered

- 15. 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 including town centres
 - Infrastructure provision
 - Flood risk
 - Waste management

16. 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.

Opportunity areas

- 17. 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. Policy SD.1 Opportunity Area in the London Plan 2021 sets out the opportunity areas for London, including for Merton and Croydon.
- 18. The London Plan 2021 identifies the *Trams Triangle Opportunity Area* referencing Croydon, Sutton and Wimbledon and ascribing Croydon with an indicative target for new homes of 14,500 to 2041 and for jobs of 10,500. Croydon has already adopted an Opportunity Area Planning Framework and defined boundary for the Croydon Opportunity Area in their adopted Policies Map and intend to take this forward unchanged in the revised Local Plan and Policies Map.
- 19. While the Trams Triangle Opportunity Area does not ascribe homes or jobs targets for Merton, the London Plan policy SD1 provides Merton with the Wimbledon South Wimbledon Colliers Wood Opportunity Area ascribes indicative targets to Merton of 5,000 homes and 6,000 jobs in the Opportunity Area by 2041. Both Merton's and Croydon's Regulation 19 Local Plans propose, or in the case of Croydon maintains, Opportunity Area boundaries for their respective Opportunity Areas which are set out below.



Fig 2: Croydon's Opportunity Area boundary

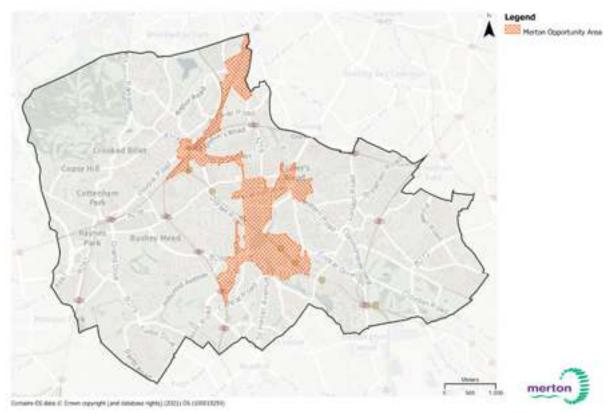


Fig 3: Proposed boundaries of the Wimbledon-South Wimbledon-Colliers Wood Opportunity area in Merton

Agreed Action

Both boroughs agree that, due to the separate boundaries of their proposed Opportunity Areas, there are no strategic cross boundary issues identified.

Strategic Areas for Regeneration

- 20. 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).
- 21. The London Plan 2021 identifies Strategic Areas for Regeneration in Merton around the Phipps Bridge, Pollards Hill and Mitcham town centre, although these are some distance from the boundaries between the two boroughs. Cross boundary issues are not identified.

Neighbourhood Planning

22. 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.

There are no other designated Neighbourhood Areas or Forums in Croydon. However, no cross boundary issues are identified.

Housing Market Area

23. 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 and Croydon are is identified within the South area along with Kingston, Wandsworth, Richmond and Sutton

Housing delivery and affordable housing

- 24. The delivery of new and affordable housing is one of the largest strategic issues London faces. Through the London Plan 2021 and in line with Planning Practice Guidance, 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.
- 25. Merton, Croydon and all other London borough local planning authorities 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.
 - Merton and Croydon 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.
 - 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 Croydon if could assist with helping to meet its housing requirement. Croydon stated that it was unable to assist due to insufficient housing capacity. However, since then the London Plan 2021 has been published with a target of 9,180 homes per decade for Merton. Merton can now meet this 10 year target within its own borders so this is no longer considered to be a cross boundary issue.

Croydon

26. The current housing target in the Croydon Local Plan adopted 2018 (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 2021 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 2021 London Plan recognises that every borough needs to play its part if London is to meet its overall housing need.

27. To inform the development of appropriate housing policies in the review of the Local Plan Croydon produced an updated Strategic Housing Market Assessment (SHMA)¹. Using the government standard methodology as well as the housing target in the draft 2021 London Plan the SHMA indicated a requirement from 2016 to 2036 for 2,302 homes per year. However, as the London Plan has since been adopted sets a minimum target of 2,079pa 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.

Merton

- 28. The 2021 London Plan sets Merton's share of London's new homes at 918 new homes per year, up from 411 homes in the 2016 London Plan, an increase of over 200%. To inform Merton's emerging 2021 Local Plan and support the delivery of new homes, recognising the substantial increase in Merton's housing target, LBM has produced the following evidence, all of which is available on Merton's website
 - Strategic Housing Market Assessment 2019
 - Housing viability study 2020
 - Merton's housing delivery study 2021
- 29. Croydon's Local Housing Need Assessment (SHMAA) identifies a net need for affordable homes that exceeds the housing target proposed in the revised Local Plan. However, following the Whole Plan Viability Study the revised Local Plan set out a strategic target for 40% (or 831 dpa) of all additional housing delivered is affordable to low income groups during the life of the Plan.
- 30. 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.
- 31. The level of need is significant, and for that reason Croydon's proposed affordable housing policy (SP2, revised Local Plan 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.
- 32. Both the new Merton Local Plan and the revised Croydon Local Plan contain policies that will support the delivery of a range of housing types, including housing for

¹ Strategic Housing Market Assessment (SHMA) August 2019

students and the elderly. It is not considered 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

33. Merton's established traveller site is located in north Wimbledon, on the border with Wandsworth. Croydon's established traveller site is located at Lathams Way. Both boroughs have carried out research to inform their gypsy and traveller needs assessments, in accordance with the national policy. As both boroughs can meet needs identified within their boundaries, this has not been identified as a strategic or cross-boundary issue. As Croydon are undertaking a partial review and there are sufficient allocated sites to meet needs the Gypsy and Travellers, these policies and allocations were not subject to the Croydon Local Plan review currently at Reg 19.

The Economy

- 34. The London Plan 2021 contains the strategic policies which designate Strategic Industrial Locations and town centre designations (from International to District Centres for all London boroughs.
- 35. 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. The revised Local Plan takes a similar strategic approach and plans up to 2039.
- 36. Merton's Local Plan review proposes a similar approach to protect employment land and enable redevelopment to meet future needs.
- 37. To support the economy the approach to office space in accordance with the London Plan the CLP18 and the revised Croydon Local Plan seeks to protect and direct office development to the central Croydon area. In Merton, Wimbledon is the borough's only major town centre and is attractive to the office market. As these two locations are geographically distant, the planned growth would not have impact on either and there are no strategic cross boundary issues identified from this approach.
- 38. Both Merton and Croydon contain policies to protect their Strategic Industrial Locations as prescribed in the London Plan 2021. While both boroughs acknowledge the industrial heritage of the Wandle Valley in their respective local plans, Merton and Wandsworth's Strategic Industrial Locations are geographically distinct, joined by their connection with the London Borough of Sutton. The joint preparation of the South London Waste Plan Development Plan Document (together with Kingston and Sutton) has reviewed each borough's SILs where there is capacity for waste uses. There are no strategic cross boundary issues from this approach.

Town and Local Centres

- 39. The London Plan identifies a hierarchy of the city's larger town centres, recognising the different size, draw and function of them.
- 40. The Merton Reg 19 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.
- 41. The Croydon Reg 19 Local Plan still reflects the strategy in the CLP18 and identifies one Metropolitan Centre (Croydon), nine District Centres (Addiscombe, Coulsdon, Crystal Palace, New Addington, Norbury, Purley, Selsdon, South Norwood and Thornton Heath and beneath this it also identifies local centres and important local parades within the borough (three new Local Centres are proposed at Five Ways, Waddon Marsh and Valley Park through the review of the Local Plan to serve the Purley Way transformation area).
- 42. Between boroughs, town centres and parades can be shared by virtue of them crossing the borough boundary. There no instances of this between Merton and Croydon.

Agreement;

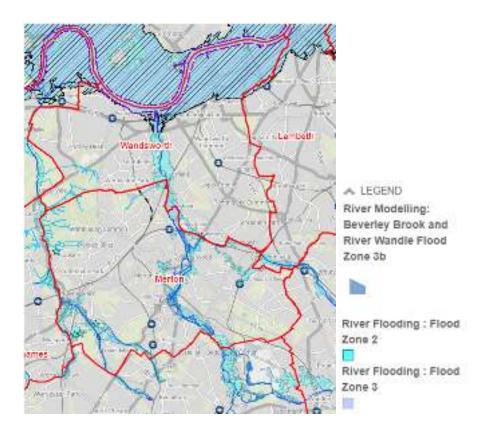
No strategic cross boundary issues are identified.

Climate change

- 43. Both Merton and Croydon councils declared climate emergencies in 2019. Merton Council adopted its Climate Strategy and Action Plan in late 2020, setting a council target for net zero by 2030 and a borough-wide target by 2050. Merton has since adopted its second year of climate actions (February 2022)
- 44. Croydon has set up the Croydon Climate Crisis Commission to guide our response to the climate emergency. In June 2021 they produced a report of recommendations that will enable the borough to become carbon neutral by 2030. In addition to this, Croydon has also adopted a <u>Carbon Action Plan</u> which had been approved at February 2022 cabinet meeting.
- 45. Both Local Plans contain policies towards achieving net zero, reducing energy and water consumption, using renewable energy and supporting the circular economy. There are no strategic cross boundary conflicts between each borough.

Flood risk

- 46. 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 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 Local Planning Authorities should use the findings to inform strategic land use planning.
- 47. As the river Wandle runs from its source in Croydon through Sutton and Merton to its mouth joining the river Thames in Wandsworth, in 2015 and 2016 the four councils produced a joint Strategic Flood Risk Assessment covering the Wandle catchment.
- 48. Since then Merton and Wandsworth Councils have produced <u>an updated joint Level 1</u> (November 2020) and Level 2 (February 2021) Strategic Flood Risk Assessment (SFRA).
- 49. 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.
- 50. The key updates to this revised Merton and Wandsworth 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.
- 51. 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 Z one 3 areas more likely to flood. The map below shows the flood extents that cross adjoining boundaries.



- 52. Croydon updated their Level 1 Strategic Flood Risk Assessment in 2021
- 53. Merton and Croydon Councils will continue to liaise on the scope and timing of strategic flood risk assessments, particularly regarding the Wandle catchment. Both Local Plans (Regulation 19) contain similar policies to minimise flood risk from all sources. No additional strategic cross boundary issues have been identified.

Infrastructure provision

- 54. Merton Council has published its <u>Infrastructure Delivery Plan 2021</u> to inform the Local Plan submission. It identifies the strategic infrastructure requirements necessary to support the anticipated homes and jobs in Merton over the next 15 years, including consideration of transport, health, education, green and blue infrastructure, sport and leisure, community, utilities, climate change, economic development and emergency services.
- 55. The current CLP18 and the revised Local Plan plans for the provision of sufficient infrastructure to meet all development needs over the plan period. Updated studies and the <u>Infrastructure Delivery Plan</u> support the additional development planned for Croydon in the revised Local Plan.

Transport

- 56. Roads There are no London distributor roads or roads on the TfL road network that join Merton and Croydon. The A236 (local road) joins Mitcham (Merton) with Thornton Road and Croydon town centre (Croydon). This supports cycling and a number of bus routes between Merton (particularly Mitcham) and Croydon town centre.
- 57. Rail National Rail services run via Merton and Croydon.
- 58. Trams The south London tram network, particularly the Wimbledon to Croydon route, crosses the boundaries of the two boroughs. As already stated, Transport for London is the transport authority and both boroughs work with each other and with TfL on maintenance and improvements of the tram infrastructure.
- 59. Both boroughs produce and implement a Local Implementation Plan (LIP) to deliver the Mayor's Transport Strategy and collaborate with other boroughs and Transport for London on this. No additional strategic cross boundary issues are identified.

<u>Healthcare infrastructure</u>

60. 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.

Merton Infrastructure Delivery Plan 2022, which is informed by the NHS CCG Merton Borough Estates Strategy, sets out the projected health needs in Merton. Croydon's Planning and Regeneration is represented at the Croydon Health Care Estates Programme Board Meeting which is reflected in Croydon Infrastructure Delivery Plan 2021.

61. Strategic cooperation already takes place via the CCG.

Education

62. 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.

- 63. The latest pupil projections indicate that there are sufficient primary school places across the majority of the borough to accommodate the planned growth up until 2026. Projections suggest that two new primary schools may be required, one to serve the Croydon Opportunity Area and another in the Purley/ Coulsdon area after 2026. Two sites have already been allocated in CLP18 to meet this projected need; Allocation 201 and Allocation 490. Any long-term future need for primary school places in the south of the borough will be taken into account in the next review of the Local Plan. Currently, the growth in the Purley Way Transformation Area is not projected to create a need for additional primary school places due to over-capacity within the existing schools in the area. The majority of the planned housing developments in the Purley Way Transformation Area are due to be delivered after 2026. To safeguard against a future rise in demand for primary school places, a site has been allocated in the Purley Way Transformation Area for a new 2FE primary school.
- 64. Pupil projections suggest that the borough currently has enough secondary school places to meet the demand from the proposed housing numbers for the next 5-10 years. Any additional need for secondary school places in the south of the borough will be accommodated in the existing allocated school site at Heath Clark and the existing site on Duppas Hill where St. Andrews CE High School was located.
- 65. 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.

Natural environment and green infrastructure

- 66. Merton has published an Open Space and Green Infrastructure Study 2020 which has informed the Local Plan policies, site designations and Policies Map amendments. Merton has also undertaken and published a Playing Pitch Strategy (adopted 2019) and Indoor Sports Needs Assessment (2020); all of which can be found on Merton's website.
- 67. Croydon undertook work on green spaces and green infrastructure as part of the Croydon Local plan which was supported by evidence. For this reason the scope of the review of the Local Plan did not require this topic to be reviewed beyond supporting increased housing development and addressing climate change.
- 68. As already mentioned, both boroughs are part of the Wandle Valley and support the All London Green Grid Wandle Valley area and the Wandle Valley Regional Park via their Regulation 19 Local Plan policies
- 69. Both boroughs are continuing the policy position to protect open space and are maintaining their adjoining Metropolitan Open Land designations (Merton for Mitcham Common; Croydon for Croydon Cemetery). Following a review of evidence, policies and policies map designations for the natural environment, open space and green infrastructure there are no cross boundary issues identified.

Energy infrastructure, minerals, community and cultural infrastructure, tall buildings and the historic environment

70. Following a review of each borough's local plan policies on the issues listed above, no strategic cross boundary issues have been identified.

Waste management

- 71. Croydon, Kingston, Merton and Sutton have a responsibility to plan for waste facilities as statutory Waste Planning Authorities. In their role as Local Planning authorities the four boroughs have planned for waste collaboratively since 2007. The four boroughs 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. The four boroughs are revising the South London Waste Plan, joint planning has taken place and the South London Waste Plan examination is currently underway, with the hearings having taken place in September 2021. Once adopted, the new South London Waste Plan will now cover the planning period 2022 to 2038.
- 72. 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, which was then adopted in 2021.
- 73. Both Merton and Croydon Regulation 19 Local Plans contain strategic waste planning policies that reference the South London Waste Plan. Cross boundary considerations are taking place via the joint Development Plan document.

Governance arrangements

74. It will be for each local authority to decide who is the appropriate person to sign the statement.

Timetable for review and ongoing cooperation

- 75. 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 most recent between Merton and Croydon took place in October 2021), the Merton and Croydon planning officers are in weekly contact regarding the South London Waste Plan joint development plan document. Both councils are in contact with each other for specific enquiries and also co-ordinate with each other and other boroughs via Urban Design London, London Councils and in the Association of London Borough Planning Officer (ALBPO) meetings.
- 76. As this statement focuses on issues of relevance to each borough's Regulation 19 Local Plans, post examinations 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.

London Borough of Merton.

Signed: James McGinlay

Jans Milistry

Position: Assistant Director, Sustainable Communities, London Borough of Merton

Date: 11th February 2022

London Borough of Croydon

Signed:



Position:

Steve Dennington

Service Head - Spatial Planning & Interim Service Head of Growth Zone and Regeneration

Date: 18/02/22