

## Statement of Common Ground – Merton and Sutton Councils

### Introduction

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 (Regulation 19 Local Plan and Sutton's adopted Local Plan 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 the London Boroughs of Merton and Sutton demonstrates how effective and on-going joint working has informed strategic policy-making through the review of Merton's Local Plan ([submitted December 2021](#)) and Sutton's Local Plan ([adopted in 2018](#)) to meet the requirements of the Duty to Cooperate.
4. In this statement the parties involved are;
  - London Borough of Merton
  - London Borough of Sutton

### 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. Sutton 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 Croydon Council and the Royal borough of Kingston upon Thames and in addition:
  - Sutton has a boundary to the south to Surrey and the local planning authorities of Surrey County Council, Epsom & Ewell and Reigate & Banstead.
  - 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.

- a. The Wandle Valley Green Grid area covers parts of Merton, Sutton, Croydon and Wandsworth.
  - b. Merton also contains parts of the the Arcadian Thames area (shared with other boroughs including Kingston, Richmond and Wandsworth)
  - c. Sutton also contains the London's Downlands area (shared with other boroughs including Bromley and Sutton)
13. Thames Water is the statutory water and sewerage undertaker for Merton and Sutton and is hence a specific consultation body in accordance with the Town & Country Planning (Local Development) Regulations 2012. In Merton and Sutton, 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 Sutton 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, town centre healthchecks, office and industrial land capacity.
  - 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 opportunities for co-ordination and co-operation such as the Association of London Borough's Planning Officers, Urban Design London, London Councils
  - Merton and Sutton are both part of the [South London Partnership](#) of five south London boroughs working together to on joint strategies and projects to promote south London's economy, infrastructure and living.
  - Working on infrastructure jointly, for example working with Transport for London on the Sutton Link project to provide a new tram route from Sutton to Wimbledon, working together as part of the South London Waste Partnership (Merton, Sutton, Sutton and Kingston) and working together on local infrastructure projects such as XXXX cycle route, Beddington Lane?

### **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 Sutton.

18. The London Plan 2021 identifies the *Trams Triangle Opportunity Area* referencing Croydon, Sutton and Wimbledon and ascribing Sutton with an indicative target for new homes of 14,500 to 2014 and for jobs of 10,500. This will be considered when Sutton review their 2018 Sutton Local Plan.

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.

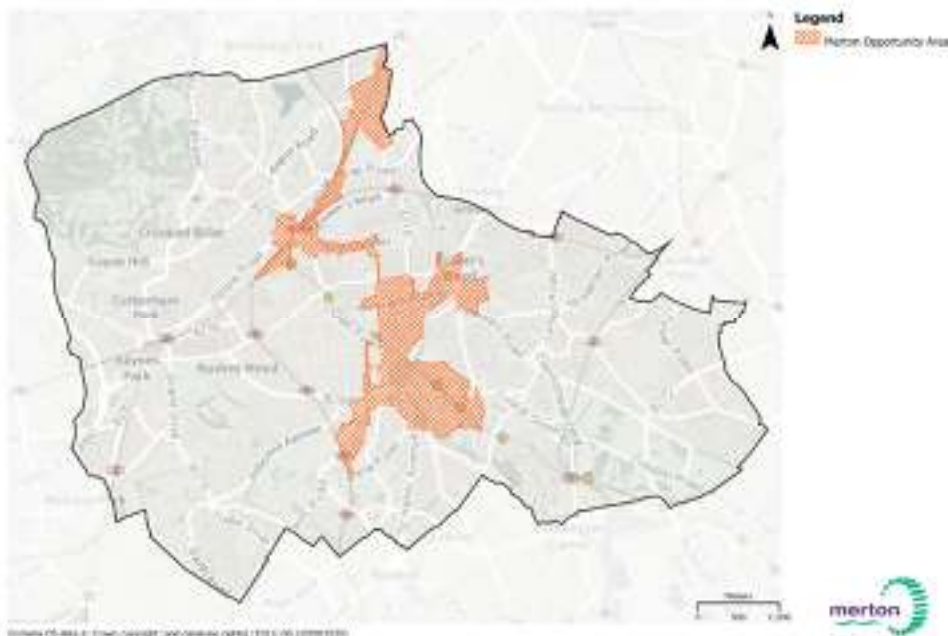


Fig 3: Proposed boundaries of the Wimbledon-South Wimbledon-Colliers Wood Opportunity area in Merton

20. Both boroughs agree that at the current time there are no strategic cross boundary issues identified due to the location of Merton's Opportunity Area boundary (Wimbledon – South Wimbledon – Colliers Wood) not adjoining Sutton. Both boroughs agree that when Sutton review their 2018 local plan, there will be further discussion on opportunity areas.

#### *Strategic Areas for Regeneration*

21. 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).
22. The London Plan 2021 identifies three Strategic Areas for Regeneration in Merton around the Phipps Bridge, Pollards Hill and Mitcham town centre, and three in Sutton, close to the borough boundary with Merton. Strategic cross boundary issues are not identified at this time.

#### *Neighbourhood Planning*

23. 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.
24. In Sutton, the Hackbridge and Beddington Corner neighbourhood plan was adopted in July 2019, adjoining the borough boundary with Merton. Both Beddington North Neighbourhood Forum and the Belmont and South Cheam Neighbourhood Forum have designated areas. The Belmont and South Cheam Neighbourhood Forum undertook first stage consultation on its draft Plan in late 2021 and is currently considering responses.

#### *Housing Market Area*

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

#### *Housing delivery and affordable housing*

26. 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.

27. Merton, Sutton 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 Sutton 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 Sutton if it could assist with helping to meet its housing requirement. Sutton 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.

#### *Sutton*

28. The current housing target in the 2018 Sutton Local Plan is for 6,405 homes over the plan period 2016-2031 (427 homes per year). In the London Plan 2021 Sutton's share of London's new homes is now higher than the adopted 2018 Sutton local plan, at 4,690 from 2019-20 to 2028-29, reflecting the new emphasis that the contribution outer London can play in delivering housing. Sutton is able to meet the Mayor's higher housing target, demonstrated through its up-to-date 5-Year Supply.

#### *Merton*

29. 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

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 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. Sutton's 2018 Local Plan identified an affordable housing need of 1,1018 per annum to 2031. Policy 8 of the Sutton Local Plan seeks to maximise affordable housing from all sources, setting a minimum target of 35% of all new homes to be affordable; this has been superseded by the 2021 London Plan.
32. Both new Local Plans contain policies that will support the delivery of a range of housing types, including housing for 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. Sutton's established traveller sites (1 public and 1 private site) are located in Woodmansterne, in the south of the Borough. Both boroughs have carried out research to inform their gypsy and traveller needs assessments, in accordance with the national policy, Planning for Traveller Sites. Sutton can meet its immediate need through a proposed extension to its public site, with future need to be assessed through Sutton's Local Plan review. Work on Sutton's review of need has not yet started but will be discussed in the future through the Duty to Cooperate. Merton can meet needs identified within their boundaries. This has not been identified as a strategic or cross-boundary issue.

### **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 2018 Sutton Local Plan sets out in accordance with paragraph 20 of the NPPF the approach to the provision of land for industry and warehousing up to 2031.
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 2018 Sutton Local Plan seeks to protect and direct office development to Sutton Town Centre and the District Centres. 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 Sutton contain policies to protect their Strategic Industrial Locations. Both boroughs were classified as "restrictive transfer" in successive Local Plans since

2004 due to the lack of supply and high demand for industrial land as prescribed in the London Plan 2021. Both boroughs acknowledge the industrial heritage of the Wandle Valley in their respective local plans, and both boroughs have their largest strategic industrial locations adjacent to each other (Willow Lane in Merton and Beddington Lane in Sutton.) Sutton's Local Plan identifies sufficient land to meet its industrial need over the Plan period within its own boundaries. The joint preparation of the South London Waste Plan Development Plan Document (together with Kingston and Croydon) has reviewed each borough's SILs where there is capacity for waste uses. Both boroughs follow a protective policy approach to SILs and there are no strategic cross boundary issues arising 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 Reg19 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 Sutton 2018 Local Plan identifies one Metropolitan Centre (Sutton), seven District Centres (Carshalton Village, Cheam Village, Hackbridge, North Cheam, Rosehill, Wallington and Worcester Park, and beneath this it also identifies local centres and important local parades within the borough.
42. Between boroughs, town centres and parades can be shared by virtue of them crossing the borough boundary. There are no instances of this between Merton and Sutton, although Rosehill District Centre is on the Merton / Sutton borough boundary.
43. No strategic cross boundary issues are identified.

### **Climate change**

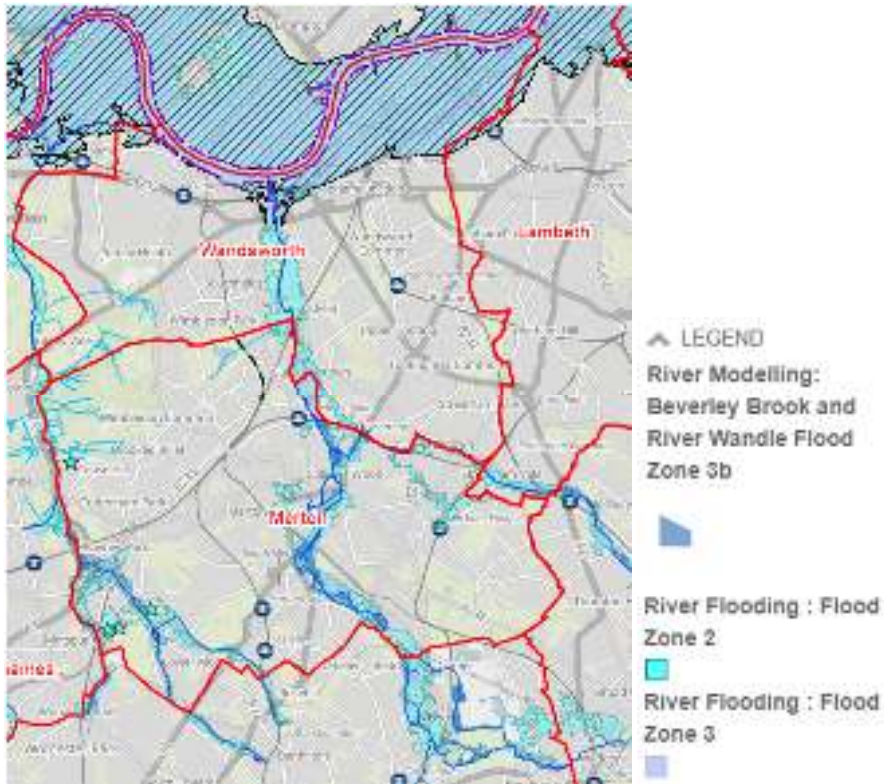
44. Both Merton and Sutton councils declared climate emergencies in 2019. Merton Council adopted its Climate Strategy and Action Plan in late 2020, setting a council target for net zero by 2030 and a borough-wide target by 2050. Merton has since adopted its second year of climate actions (February 2022)
45. Sutton has set an ambitious target to achieve net zero carbon emissions (for the council and wider borough). This commitment is reiterated in the Environment Strategy and Climate Emergency Response Plan 2019-2025. The Climate Emergency Response Plan is updated annually with quarterly progress reports also available on the councils website.



46. 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**

47. 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.
48. 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.](#)
49. Since then Merton and Wandsworth Councils have produced [an updated joint Level 1 \(November 2020\) and Level 2 \(February 2021\) Strategic Flood Risk Assessment \(SFRA\).](#)
50. 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.
51. 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.
52. 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.



53. Merton and Sutton Councils will continue to liaise on the scope and timing of strategic flood risk assessments, particularly regarding the Wandle catchment. Both Local Plans 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 [Infrastructure Delivery Plan 2021](#) 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 2018 Sutton Local Plan supports the provision of sufficient infrastructure to meet all development needs over the plan period.

### Transport

56. *Roads* The A24 and the A297 are London distributor roads or roads on the TfL road network that join Merton and Sutton. The A236, 237 and 217 (local road) also join the boroughs. This supports cycling and a number of bus routes between Merton (particularly Mitcham) and Sutton town centre.

57. *Rail National* Rail services run via Merton and Sutton, including the “Wimbledon loop” which also runs to central London via Streatham.
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. From c2015 Sutton and Merton worked together very closely with Transport for London on the proposed new tram network between Sutton town centre and Merton (Colliers Wood or Wimbledon), known as the “Sutton Link”, however this project was paused in February 2020 due to lack of funding.
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.

#### Healthcare infrastructure

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, Croydon and Sutton. 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.
61. Merton Infrastructure Delivery Plan 2022, which is informed by the NHS CCG Merton Borough Estates Strategy, sets out the projected health needs in Merton.
62. Strategic cooperation already takes place via the CCG and there are no strategic cross boundary issues.

#### Education

63. 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.
64. Sutton’s Local Plan identified sites for three new Primary Schools, two Secondary Schools and an SEN School to meet the need for school places over the Plan period. To date a new Primary School has been delivered in Hackbridge and a new

Secondary School in Belmont. In March 2021 the Secretary of State approved planning permission for a new Secondary School at Rosehill, Sutton, located on the boundary with Merton (Sutton Free School 1). However, secondary schools in Sutton have proposed an [alternative strategy](#) (see item 6) to Sutton Free School 1 in a joint approach with the secondary school Heads in Merton. This approach means the forecast temporary demand (over the next 5-6 years) for places in Sutton is proposed to be met within the borough as an alternative to building a new school at Rosehill.

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](#). 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 (WVRP). The delivery of the Sutton's Beddington Farmlands restoration scheme, to form the single largest parcel of the WVRP, is a key strategic objective for Sutton. Sutton will prepare any additional relevant evidence in addition to this for the future review of the Local Plan, in consultation with Merton and other interested cross-boundary stakeholders.

67. Both boroughs are continuing the policy position to protect open space. 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

68. 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**

69. 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.

70. 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.

71. Both Merton (Regulation 19) and Sutton (adopted 2018) 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**

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

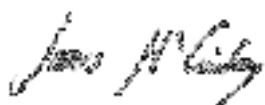
### **Timetable for review and ongoing cooperation**

73. This statement has been informed by on-going engagement between the parties and has been informed by various evidence base documents. Merton and Sutton planning policy officers are in weekly contact on plan-making matters particularly regarding the South London Waste Plan joint development plan document. Both councils also coordinate with each other and other boroughs via Urban Design London, London Councils and in the Association of London Borough Planning Officer (ALBPO) meetings.

74. As this statement focuses on issues of relevance to Merton's Regulation 19 Local Plan and Sutton is yet to commence the Local Plan review, it is only likely to need further updating once work commences on any future revisions to Sutton's 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

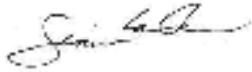


Position: Assistant Director, Sustainable Communities, London Borough of Merton

Date: 11<sup>th</sup> February 2022

**London Borough of Sutton**

Signed: Simon Latham

A handwritten signature in black ink, appearing to read 'Simon Latham', written in a cursive style.

Position: Assistant Director, Housing, Planning and Regeneration

Date: 2<sup>nd</sup> March 2022