Merton’s Sites and Policies Plan and Policies Map

Duty to co-operate statement

September 2013
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1 Introduction

1.1 The *Sites and Policies Plan and Policies Map* forms part of Merton’s Local Plan, along with Merton’s Core Planning Strategy (adopted July 2011) and the South London Waste Plan (adopted March 2012).

1.2 This document sets out how the London Borough of Merton complied with the statutory Duty to Co-operate as set out in the Localism Act 2011 in preparing the submission document of the *Sites and Policies Plan and Policies Maps*. 
2 Localism Act

2.1 The ‘Duty to Cooperate’ is a statutory duty. Section 110 of the Localism Act 2011 inserts section 33A and section 20(5) (c) into the Planning and Compulsory Purchase Act 2004.

2.2 Section 33A imposes a duty on a local planning authority to cooperate with other local planning authorities, county councils and bodies or other persons as prescribed (being those identified in regulation 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012).

2.3 Section 20(5) (c) includes the duty for the purposes of the independent examination and there is a need to demonstrate compliance if examination is to proceed. Section 33A came into force on 15 November 2011 and applies to all plans submitted for examination after that date even if their preparation started before the commencement of the duty. There are no transitional provisions.

2.4 Duty to cooperate requires a local planning authority to engage constructively, actively and on an on-going approach in any process; by means of which particular activities are undertaken. This duty relates to strategic matters in the preparation of:

- Development plans
- Other local development documents
- Marine plans,

2.5 The 2011 Localism Act defines a strategic matter as sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impacts on at least two planning areas, which include district, county and London Councils.

2.6 In respect of these strategic matters the Council is required to co-operate with the following in line with the Localism Act:

- Neighbouring local planning authorities
- a county council in England that is not a local planning authority
- Environment Agency
- Historic Buildings and Monuments Commission for England (known as English Heritage)
- Natural England
- Mayor of London and the Greater London Authority (GLA)
- Civil Aviation Authority
- Homes and Communities Agency (for London under the GLA)
- Primary Care Trusts and NHS (or similar bodies)
- Office of Rail Regulation
- Transport for London (TfL)
- Each highway authority within the meaning of section 1 of the Highways Act 1980 (including the Secretary of State, where the Secretary of State is the highways authority)
- Marine Management Organisation (not applicable to Merton)
- a “local enterprise partnership” (the recently established Pan-London LEP operates through the Mayor of London/GLA)
- London Councils.

The National Planning Policy Framework (NPPF)

2.7 The National Planning Policy Framework (NPPF) (paragraphs 178 to 181) gives further guidance on ‘planning strategically across local boundaries’. In addition, para 178 states that: ‘The Government expects joint working on area of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities’.

2.8 The NPPF confirms that public bodies have a Duty to Co-operate on planning issues that cross administrative boundaries, particularly those, which relate to the strategic priorities set out in paragraph 156 of the NPPF.

2.9 Local Planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic polices to deliver:

- the homes and jobs needed in the area;
- the provision of retail, leisure and other commercial development;
- the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
• the provision of health, security, community and cultural infrastructure and other local facilities; and
• Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

2.10 Paragraph 181 of the NPPF states that ‘Local Planning Authorities will be expected to demonstrate evidence of having successfully cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination’

The Planning Inspectorate

2.11 The Planning Inspectorate has indicated that a Duty of Co-operation statement is a requirement which must be completed at the time the Local Plan is submitted to the Secretary of State for examination and cannot be retrospectively applied through the examination process of the Local Plan.

3 Merton context

3.1 Merton is an outer London borough, situated south west of central London and bordering Wandsworth, Kingston, Sutton, Croydon and Lambeth boroughs. Merton’s area is 37 square kilometres (3,700 hectares) and is predominately residential in character, playing a transitional role from urban to suburban neighbourhoods, neither bordering Surrey nor central London. Commons, parks and other open spaces are an important component of the character of Merton, covering approximately 25% of the borough.

3.2 Like all London boroughs, Merton’s Local Plan must be in general conformity with spatial development strategy for London, also known as the London Plan (Planning and Compulsory Purchase Act 2004, section 24).

3.3 In practice, this means that London boroughs co-operate with each other and with the Mayor of London on a wide range of strategic planning factors and on their delivery.

3.4 For example, the Mayor of London is responsible for strategic planning for new homes in London and co-ordinates the preparation of the London-wide Strategic Housing Land Availability Assessment, strategic plan making via the London Plan and
the Mayor’s Housing Strategy to assist delivery Targets for each of the 33 London borough’s contribution to London's housing need is set in the London Plan (policy 3.3 of the London Plan 2011). On delivery, the Homes and Communities Agency has recently been incorporated into the GLA family for its operation within London boroughs.

3.5 As Merton’s *Sites and Policies Plan and Policies Map* is in general conformity with the Mayor’s London Plan and Merton’s recently adopted Core Planning Strategy 2011 and South London Waste Plan (joint development plan document) 2012. Strategic issues are dealt with in these documents and therefore co-operation for the *Sites and Policies Plan* tends to be more focussed on delivery. For example, Transport for London (part of the Greater London Authority) and Merton Council are currently working together to produce a draft planning brief for sites within Morden town centre, which will help to deliver site proposals 57, 58, 61 and 65 in the *Sites and Policies Plan*.

**Merton’s Local Plan**

3.6 Merton’s Local Plan (figure 2), sets out proposed planning policies for Merton to guide growth in housing and jobs, infrastructure delivery, place-shaping and the quality of the built environment over the next 10 years.

3.7 Once adopted, the *Sites and Polices Plan and Policies Map* will replace the remaining ‘saved’ policies in Merton’s Unitary Development Plan 2003 and will become part of Merton’s Local Plan.

3.8 Once the *Sites and Policies Plan and Policies Map* is adopted, Merton’s Local Plan will be made up of four main statutory policy documents:

- The London Plan (published August 2011) – spatial development strategy for London
- Merton’s Core Planning Strategy (adopted July 2011)
- South London Waste Plan (adopted March 2012)
3.9 The Local Plan retains the spatial vision and strategic objectives of Merton’s Core Planning Strategy, adopted in July 2011. Merton’s Core Planning Strategy has been assessed against the National Planning Policy Framework (NPPF) and the council considers that Merton’s Core Planning Strategy is consistent with the NPPF.

3.10 The spatial vision (figure 3), strategic objectives (figure 4) and spatial portrait, have all influenced and informed the Sites and Policies Plan and Policies Map.

**Figure 3: Merton’s Spatial Vision**

<table>
<thead>
<tr>
<th>Merton’s Spatial Vision</th>
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<tr>
<td>a) Reducing pollution, developing a low carbon economy, consuming fewer resources and using them more effectively;</td>
</tr>
<tr>
<td>b) Improving the overall environment of Mitcham District Centre and surrounds by supporting businesses and enterprise, enhancing the public realm, and a more sustainable mix of new homes, including family housing;</td>
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c) Regenerating Morden District Centre to provide improved quality and quantity of commercial, residential and leisure uses in an attractive suburban setting;

d) Creating a thriving, attractive and coherent District Centre at Colliers Wood, addressing flood risk comprehensively and facilitating an improved range of town centre uses;

e) Ensuring Wimbledon town centre continues to develop and maintain its position, offering excellent cultural, shopping and business facilities;

f) Conserving and enhancing Merton’s green character and historic environment;

g) Promoting a diverse and resilient local economic base, supporting Wimbledon as the borough’s Major Centre and building on Merton’s strengths in location, attractiveness, brand value and expertise;

h) Maintaining and improving Local Centres at Arthur Road, North Mitcham, Motspur Park, Raynes Park and Wimbledon Village, and Neighbourhood Parades, and improving the public realm throughout the borough;

i) Supporting local community life through education and employment opportunities, cultural and sporting assets, community services, healthcare, recreational activities and other infrastructure that meets local needs;

j) Influencing the way in which new development responds to the challenge of climate change and by increasing the production of local renewable and low carbon “decentralised” energy;

k) Recognising Merton’s valued suburban and urban character when providing a mix of new homes, including family homes;

l) Making Merton an easy place to get to and around by walking, cycling, public transport and road;

m) Reducing the impacts of flooding, waste disposal, travel congestion, energy costs and utilities infrastructure.
### Strategic Objective 1
To make Merton a municipal leader in improving the environment, taking the lead in tackling climate change, reducing pollution, developing a low carbon economy, consuming fewer resources and using them more effectively.

### Strategic Objective 2:
To promote social cohesion and tackle deprivation by reducing inequalities.

### Strategic Objective 3:
To provide new homes and infrastructure within Merton’s town centres and residential areas, through physical regeneration and effective use of space.

### Strategic Objective 4:
To make Merton more prosperous with strong and diverse long term economic growth.

### Strategic Objective 5:
To make Merton a healthier and better place for people to live and work in or visit.

### Strategic Objective 6:
To make Merton an exemplary borough in mitigating and adapting to climate change and to make it a more attractive and green place.

### Strategic Objective 7:
To make Merton a more connected place where walking, cycling and public transport are the modes of choice when planning all journeys.

### Strategic Objective 8:
To promote a high quality urban and suburban environment in Merton where development is well designed and contributes to the function and character of the borough.

**Figure 4:** Merton’s Strategic objectives.
Cross boundary Strategic Partnerships

London Enterprise Panel (London’s Local Economic Partnership)

3.11 Merton Council is represented in London’s Enterprise Panel (LEP) (London’s Local Enterprise Partnership). The LEP is made up of a mixture of representatives from the public and private sector and has been set up to:

- Provide strategic investment to support private sector growth and employment;
- Promote enterprise and innovation and the acquisition of skills for sustained employment in London;
- Protect and enhance London’s competitiveness

3.12 The LEP has prepared a Jobs and Growth Plan 2013-20 which outlines the main focus for jobs and economic growth within the area for the next few years. The Jobs and Growth Plan has four main sections, each of which have sub-groups and actions:

- Skills and employment: to ensure Londoners have the skills to compete for and sustain London’s jobs;
- Micro, small & medium sized enterprises: to support and grow London’s businesses; The Leader of Merton Council, Cllr Stephen Alambritis, is co-opeted by London Councils, representing all London boroughs on this group
- Digital creative, science & technology: for the capital to be recognised globally as world leading hub; for science, technology and innovation - creating new jobs and growth; and
• Infrastructure: to keep London moving and functioning.

3.13 Each council, Merton included, will put proposals forward for funding to the LEP. The LEP then co-ordinates, encourages and support collaboration cross boundary, and represents these bids to Europe as necessary. For example, Merton has recently participated in the Growing Places Fund Round 2 (July 2013) and while the exact details of borough involvement is currently confidential, the agenda and minutes of recent meetings on this issue are publicly available online via: http://www.london.gov.uk/priorities/business-economy/working-in-partnership/london-enterprise-panel

South London Partnership

3.14 The South London Partnership covers five south London boroughs; Croydon, Kingston, Merton, Richmond and Sutton to promote and represent the interests of south London, particularly with regard to economic development and transport planning.

3.15 Members of the South London Partnership are made up of public, private and community organisations. There are several different groups which generally meet quarterly: Transport Strategy, Strategic Planning, Business Development and the Go South London Olympic Group. Mayor’s 2011 London Plan. The Partnership provides the opportunity for boroughs to address issues that affect the south London; these matters include gypsy and traveller provision, transport, economic growth and regeneration and waste

3.16 Within the South London Strategic Partnership are a number of thematic groups and boards there are:

• **South London Planning & Regeneration Group (SLP&RG):** chaired by Sutton and attended by Merton, Lambeth, Croydon, Kingston, Wandsworth, Richmond and Bromley Councils
• **South London Partnership Forum:** brings together the sub regional organisations operating in south London across the public, business and not-for-profit sectors to:
  - Strengthen the representation of south London interests to regional bodies and regional government; and,
  - Provide mutual support and a mechanism for collaboration between sub-regional bodies operating in south London.
• **Transport Strategic Board**: provides a joint mechanism between Transport for London (TfL) and the south London local authorities for the development of a transport strategy for south London.

• **Strategic Planning Group**: provides forum where planning and transportation matters of sub-regional and pan-regional importance can be discussed and appropriate responses/actions agreed.

3.17 The Partnership has also investigated the advantages of SLP members and South London Boroughs co-operating with areas outside London on a pragmatic basis, regarding specific issues for example cross boundary economic growth, transport and where a shared interest in cooperation is apparent.

3.18 **Business Workforce Development group**: provides a forum to progress and share information on those business support actions as set out in the Sub-regional implementation plan;

• Influence lead partners and contract holders,

• Provide a forum for the exchange of information on developments and initiatives and;

• A forum for discussion of policy issues that is relevant to business support and workforce skills and to the continued economic health and well being of businesses in south London.

3.19 The South London Partnership website demonstrates several examples of cross-boundary co-operation. One example that is relevant to the Sites and Policies Plan and Policies Map is: the South London Cycling Charter, which complements Merton’s Biking Borough Strategy in helping to deliver the Mayor’s Transport Strategy.
3.20 The Mayor established the **Outer London Commission** to advise him on how outer London can contribute to and benefit from London’s economic success, focusing mainly on town centres, industrial areas and London Plan opportunity and intensification areas (such as the Area for Intensification in Colliers Wood South Wimbledon).

3.21 The Outer London Commission was most active in 2011 when the London Plan 2011 was being prepared. The Leader of Merton Council, Cllr Stephen Alambritis, is co-opted onto the commission as a representative of London Councils.

3.22 As part of the preparation of the draft London Plan 2014, the Outer London Commission is attempting to co-ordinate responses from outer London boroughs to inform the next draft of the London Plan, due to be published in January 2014. The meeting in south London is due to take place in October 2013 and is expected to pose the same questions as for the north London meeting, which took place in Enfield on 12 September 2013.

- How should the town centre network respond to changing levels and patterns of consumer expenditure? (attached: Options Note item 5.1; GLA officer Background Briefing item 6; Experian retail need study item 7)
- How can the housing potential of town centres be realised (attached: Options Note item 5.2).
- What further management measures are required to enhance the contribution of the night time economy to town centre vitality and viability?
- How can the development potential of London’s large sites be realised through planning and non-planning means
- How could the offer of London’s ‘trading estates’ be improved?
3.23 Details of these meetings, including the agenda, papers and minutes for the north London meeting which is being replicated in south London on 10 October 2013, are available on the Outer London Commission’s website: http://www.london.gov.uk/olc/meetings/

3.24 Merton Council participates in a number of groups that take a strategic approach to meeting the needs for gypsy and traveller accommodation across South London. These groups include the:

3.25 **South London Gypsies & Travellers working group** – Attended by Merton, Kingston, Wandsworth, Richmond Sutton and Croydon local Councils.

3.26 These groups meet to share information, define and set out approaches through joint meetings attended by south London boroughs and representatives for Gypsy and Traveller. These meetings provide boroughs and representatives opportunities to develop continuous engagement, good working practices and principles.

3.27 The above groups look at the specific issues that can affect this group for example accommodation and discuss the best way these issues can be addressed in council’s Local Plan, other development documents and joint working documents.

3.28 Merton is a member of and participates in the **London Waste and Recycling Board (LWARB)** in order to work strategically with the Mayor and other London boroughs to increase London’s capacity for sustainable waste management in accordance with London Plan policy.

3.29 Merton Council is part of the **Drain London project**. The project is currently looking at one of the most serious challenges that London will face in the near future from surface water flooding.


3.31 To achieve more effective working practices, Drain London is split into sub regional groups, to which Merton is in sub-regional group 7. Other borough members of this sub group are Lambeth, Sutton, and Southwark.
3.32 Drain London provide helps and guidance for boroughs to manage and reduce surface water flood risk in their area and the whole of London by improving boroughs’ knowledge of the surface water drainage system and identifying areas at greatest risk of flooding.

3.33 Within, Drain London project there are forums which help boroughs with their responsibilities for managing flood risk by providing guidance on asset registers, helping to form multi-agency partnerships and sharing good practice, knowledge and expertise.

3.34 Merton Council participated in the All London Green Grid (ALGG) whose purpose is establishing engagement on cross border open space projects. The Group enabled Merton to work closely with other authorities on positive management of the ecological and land management issues arising from open space development and national, regional guidance on open space.
4 Duty to co-operate and Merton’s *Sites and Policies Plan and Policies Maps*

4.1 As already stated above, Merton works closely with other London boroughs and the Mayor of London on many strategic (and some local) issues. As the London Plan is London’s spatial development strategy and is therefore part of the statutory development plan for all London boroughs, the London Plan policies apply within each borough and are not repeated in each borough’s Local Plan.

4.2 Given the scope and context of Merton’s Core Planning Strategy and the South London Waste Plan, Merton’s *Sites and Policies Plan and Policies Maps* addresses predominantly non-strategic issues.

4.3 The Council has identified a small number of strategic issues that the *Sites and Policies Plan* is proposing to address together with the cooperative work already carried out to deal with these and the actions taken or identified to address these issues jointly. This section sets out these issues in more detail, and the outcomes achieved from co-operation.

4.4 As mentioned earlier in this report Merton’s neighbouring boroughs are the London boroughs’ of Croydon, Lambeth and Sutton and the Royal Boroughs of Kingston and Richmond (Figure 1). Given the scope and context of the *Sites and Policies Plan and policies Map*, engagement and co-operation has been most relevant to these boroughs. Strategic engagement continues with other London boroughs and surrounding regions on delivering Merton’s Core Planning Strategy and the South London Waste Plan.

4.5 Each of the above boroughs have its own Local Plan at various stages of preparation. Meetings and continuous engagement has been held with these boroughs periodically, both individually and collectively, to help achieve a full assessment of cross-border issues and strategic alignment of objectives and policies.

4.6 As already stated in Section 3, Merton is also part of both outer London and the south London sub-region. Some elements of the evidence base have been prepared jointly at sub-regional level to ensure that sub-regional issues are fully assessed.
Figure 1: Merton and neighbouring boroughs
4.7 Neighbouring borough along with other organisations and partnerships will continue to be actively engaged during the delivery and implementation of Merton’s Local Plan. The key cross-border strategic issues identified in the Merton’s Local Plan are, but not limited, to:

- Transport network: roads, rail, underground, walking and cycling
- Housing
- Gypsies and Travellers
- Site allocation including Wimbledon Greyhound Stadium
- Wandle Valley Regional Park
- Open space/green corridors
- School places
- Flood risk management
- Waste planning

4.8 Full details of the meetings can be found in appendix A of this report and responses from consultations can be found on Merton’s website) and the councils action following the response can be found in Merton’s Statement of Consultation

**Strategic cross boundary issue 1: Housing**

4.9 The Mayor of London has strategic control of housing policy and planning for new homes. Strategic planning for new homes in London is set out in the Spatial Development Strategy for London: the London Plan (2011). Chapter 3 of the London Plan 2011 is set As already stated earlier in this report, all London boroughs have to be in general conformity with the Mayor’s London Plan and housing issues are one of the areas where greatest uniformity arises.

4.10 The London Plan is part of the statutory development plan and its policies can be used directly in making planning decisions.

4.11 London Plan Policy 3.3 *Increasing Housing Supply*, which includes the annual housing targets for each borough, to demonstrate how each borough will contribute to its share of London’s housing needs. Merton’s contribution is set at 3,200 homes in 10 years (320 new homes per year). Merton’s Core Planning Strategy policy CS8 *Housing choice* and CS9 *Housing Provision* is in conformity with the London Plan 2011

4.12 In 2013, the GLA co-ordinated and managed a Strategic Housing Land Availability Assessment to ensure that London will continue to meet objectively assessed housing need. The GLA SHLAA was co-ordinated by the GLA using a shared methodology across all London boroughs. Each borough had to supply information on land designations, local policy matters, local site capacity and delivery issues. Planning officers from each borough met with the GLA representatives to discuss their borough’s
input into the SHLAA, especially on the likelihood of site deliverability. Merton’s meeting took place in August 2013 and the proposed site allocations in Merton’s Sites and Policies plan were shared with the GLA to help assess Merton’s share of London’s future housing needs. The findings of London’s SHLAA are likely to be published in January 2014.

4.13 Policy 3.4 Optimising housing density sets out the density matrix for new residential development in relation to public transport accessibility.

4.14 Policy 3.5 Quality and Design of Housing Developments sets minimum gross internal area space standards for new developments in London, according to the type of dwelling (house or flat) and the number of people occupying it.

4.15 Co-operation outcome: the results of the London-wide SHLAA, allocating a new housing target for each borough, are due to be published in the draft London Plan (January 2014). The council considers that this is unlikely to affect the Sites and Policies Plan and Policies Maps because:

- The SHLAA has been prepared by using a shared methodology between the GLA and the 33 London boroughs and applying this to each borough’s particular circumstances to assess the capacity for delivery.
- All proposed site allocations with a residential component in the Sites and Policies Plan have been included in the SHLAA and their delivery is supported by landowners. No landowner is stating that residential development is unviable on their sites.
- Merton’s Local Plan, including the Sites and Policies Plan and Policies Map has been assessed for viability, demonstrating that residential development is viable in Merton.

Planning for traveller sites

4.1 In preparing the London Plan 2011, the Mayor of London determined that gypsy and traveller accommodation needs should be assessed and managed locally (rather than at a pan-London level like other residential accommodation).

4.2 Starting in 2011 and continuing into 2013, Merton Council had been engaging informally with other boroughs to source best practice techniques in successfully engaging the traveller community, with Merton Priory Homes (the local Registered Provider), Merton’s housing department and Merton’s Traveller Education Service.

4.3 In 2011, as part of Merton’s Sites and Policies Plan evidence gathering and preparation Merton Council undertook primary research into local gypsy and traveller needs in Merton. Due to the difficulties of engaging successfully with this group, who are identified as being hard to reach in Merton’s Statement of Community Involvement, the council decided to work with an event specialist from the traveller community to (a)
encourage gypsies and travellers to attend the event and participate in the research while attending.

4.4 The event was held in October 2011, hosted by Ambition Group and attendees answered questions to assist with traveller accommodation needs identification. The findings of the research are set out in the gypsy and traveller accommodation assessment 2013.

4.5 In March 2012, government published national policy on this issue: “Planning for traveller sites”

4.6 In summer 2012, Merton Council led on the organisation of a workshop (on 21 August 2012) with other south London boroughs (Kingston, Sutton, Wandsworth, Croydon, and Richmond) to find whether or not boroughs were in a position to agree either joint working or at least common approaches for undertaking work to assess needs and identify sites, and to help identify cross borough travelling communities and to share best practice.

4.7 Due to the different stages of evidence gathering and plan-making that councils were at and the different ethnic backgrounds of local traveller communities in each borough, boroughs decided to follow the Mayor of London’s approach and plan for traveller sites at a local level, while sharing best practice and research findings. At that stage, councils considered that accommodation needs for travellers could be identified and met locally.

4.8 As an outcome from this meeting, Merton Council also led on the coordination of mapping authorised sites across south London and sharing best practice and findings. Appendix C figure x of Gypsies and Travellers sites in Merton and neighbouring boroughs.

4.9 Throughout 2012 and 2013, Merton Council continued dialogue with neighbouring boroughs, through one-on-one meetings, phone calls and pan-London meetings, which helped to share research approaches and keep each other up-to-date and see if circumstances had changed with either or both boroughs.

4.10 In addition to the event findings in 2011, Merton Council undertook further qualitative research by engaging directly with the Gypsies and Traveller families on Merton’s authorised site, Brickfield Road in December 2012 and quantitative research by interrogated the Census 2011 information, housing and planning records and assessing proposed sites in the Sites and Policies Plan against specific deliverability criteria for traveller sites.

4.11 As part of each formal consultation stage, in addition to the work above, the Council formally engaged with a number of representative organisations of gypsy and traveller communities:

- Stage 1 (July 2011) Merton Traveller Education Service;
- Stage 2 and 2a (January and July 2012): South London Irish Welfare Society; The Gypsy Council; Merton Traveller Education Service;
Stage 3 (January 2013): the council sent correspondence tailored to gypsy and traveller representatives including: Azadeh Community Network; the National Federation of Gypsies Liaison Groups; the Showmans Guild of Great Britain; Travellers Liaison Group and the London Gypsy and Traveller Unit as well as the groups contacted at Stages 1, 2 and 2a.

4.12 Apart from the responses from neighbouring boroughs, only the London Gypsy and Traveller Unit (LGTU) responded to Merton’s consultation. The LGTU’s view is that the council has not complied with the Duty to Co-operate in this regard in part because no joint research has been undertaken. The council’s view is that it has, especially as Merton has led on the co-ordination with other boroughs and taken a proactive approach to engaging the traveller community locally.

Outcomes attributed to co-operation:
- Local agreement that needs assessed and managed locally within each council while sharing info on best practice
- Clear identification of whether and how each borough in south London meets Travelling Showpeople accommodation needs including patterns of working movement across south London and adjoining south eastern areas.
- Strategic identification of permanent authorised south London traveller sites (see map Appendix C)
- Continued exploration of cross boundary issues and movements
- Improved research

Affordable rents

4.13 The Mayor of London’s Revised Early Minor Alterations (REMA) to the London Plan (2013) set out the Mayor’s position on affordable rent. Policy 3.10 Definition of affordable housing has been revised by the Revised Early Minor Alternations of the London Plan (REMA).

4.14 Based on the findings of research into 40,000 homes from the Registered Provider, Circle Anglia (parent organisation to Merton Priory Homes) Merton Council was initially proposing a policy at consultation stages 2a, 3 and pre-submission (stage 4) that, in the Mayor of London’s opinion, was not in general conformity with the London Plan REMA on affordable rent.

4.15 Based on the feedback from pre-submission consultation and further consideration of the evidence available, the council is requesting that policy DM.H3 in the Sites and Policies Plan be amended to conform with London Plan policy 3.10. Correspondence from the Mayor of London (September 2013) states that this proposed amendment is likely to bring Merton’s Sites and Policies Plan into general conformity with the London Plan.
Strategic cross boundary issue 3: Wimbledon Greyhound Stadium site allocation

4.16 Wimbledon Greyhound Stadium (site 37 in Merton’s Sites and Policies Plan) is located within Merton, though the site’s boundary on two sides is adjoining the London Borough of Wandsworth. Since, its inclusion as part of the ‘call for sites’ consultation in 2011, Merton Council has engaged with Wandsworth Council even before the policy of ‘Duty to cooperate’ came into effect.

4.17 The council’s proposed allocation for the site can be summarised as for sporting intensification supported by appropriate enabling development.

4.18 A number of different participants have proposed a range of potential schemes: a football stadium, a greyhound stadium, light industrial, different quantum of retail and residential. While this approach is flexible and adaptable to change, it makes it difficult for stakeholders to thoroughly assess the effects that might arise from the site’s redevelopment. As a result, much of the initial assessment has been fairly strategic, commenting on the principles of development without committing support to the details of any particular scheme.

4.19 As well as community groups, other landowners and tenants, local residents, stakeholders engaged specifically on this issue have been:

- Wandsworth Council: at specific meetings to discuss cross-boundary issues
- The Greater London Authority, which includes Transport for London: at dedicated meetings to discuss strategic issues in 2012 and by phone and in writing
- The Environment Agency: at specific meetings
- Thames Water by phone and in writing
- National Grid: by phone and in writing
4.20 Other organisations, such as English Heritage and Natural England also had the opportunity to respond on this site, and all other aspects of the plan.

4.21 The purposes of engagement has been to explore the issues relating to the redevelopment of this site for sports intensification, what enabling development might be suitable and any associated impact on services for both councils and for other stakeholders such as Transport for London. Issues discussed have related mainly to transport (road, rail and foot), impacts on existing development nearby and impacts on local services including school places.

4.22 **Outcomes attributed to co-operation:**

- For stakeholders, a more complete understanding by stakeholders of the various schemes submitted to the council (given the number of differing schemes proposed on this site and the fairly substantial media interest).
- For the council, a more complete understanding of the opportunities and issues identified by the stakeholders.
- Following engagement with Wandsworth they support the site allocation land use for the site. The Environment Agency supports the principle of developing the site, subject to reducing local flood risk.
- At pre-submission publication Thames Water have identified potential capacity issues for water / sewerage supply for the site and the council is requesting that Site 37 be updated to reflect this.
- The National Grid, who own adjoining land to the west of the site, have also identified issues to do with their landholding that may affect Site 37.
- For those proposing to redevelop the site, co-operation has achieved an more comprehensive early understanding of the issues raised by all stakeholders, so that they know what opportunities and constraints the site has and what actions redevelopment will have to undertake.
Strategic cross boundary issues 4: Site allocations and land designations

4.23 In accordance with ‘Duty to Co-operate’ requirements, Merton Council engaged and consulted with neighbouring boroughs on the all Merton’s sites allocations; from the initial 82 sites (call for site and Stage 2) to the Stage 4 pre-submission 41 proposed site allocations in the final Sites and Policies Plan.

4.24 During 2012, Merton Council prepared specific maps for each of the neighbouring boroughs to help illustrate and emphasise Merton Council’s preferred options for site allocations and land designations adjoining the borough boundary.

4.25 Each map was accompanied by the full consultation documents (for stages 2 and 2a) together with a letter explaining the issues that Merton thought that the neighbouring borough might find relevant.

4.26 Examples of these maps and letters are contained as an appendix to this report.

4.27 It should be noted that these meetings did not focus on strategic issues where the boroughs had already successfully co-operated (for example, waste management where the boroughs had already adopted a joint waste development plan document) unless updates were required. The meetings were to focus on issues relevant to the current stages of plan-making.

Sutton Council

4.28 Sutton and Merton have the longest shared local authority boundary. However, due to the existing 1930’s suburban development patterns means that the capacity for new development or radical change is very restricted. In addition, Sutton Council is not preparing or revising its Local Plan documents at this time, so scope for co-operation on joint evidence and plan-making was restricted.

4.29 Following receipt of the maps and letters from Merton, a meeting took place with Sutton Council on 09 July 2012, and subsequently specifically on gypsies and travellers

4.30 Aside from gypsies and travellers and the Wandle Valley Regional Park (which is dealt with elsewhere in this report) the issue of greatest common interest was Merton’s proposal for a second access to the Strategic Industrial Location at Willow Lane (Merton Transport Proposal 15TN), which Sutton felt would benefit their traffic movements in the area.

4.31 The appendices to this document summarises the discussions and shows what actions arose

Wandsworth Council
4.32 Wandsworth Council also shares a long border with Merton. Although there is no development potential for part of this, where Wimbledon Common in Merton adjoins Putney Heath in Wandsworth, there are significant environmental protection designations in this area.

4.33 However, between Tooting and Earlsfield (Wandsworth) and Colliers Wood and Wimbledon (Merton) there is more significant development potential. Earlier iterations of the Mayor’s London Plan had designated the South Wimbledon / Colliers Wood as an Area for Intensification, and while the London Plan 2011 no longer proposes that this should extend into Wandsworth, there are some significant development sites in the area such as Wimbledon Greyhound Stadium. (described elsewhere in this report).

4.34 In June 2012, Merton Council sent Wandsworth Council the letter and map emphasising issues of interest in Merton’s “preferred options “ plans (stages 2 and 2a). The councils met in August 2012 and actions from this meeting included continued dialogue on sites such as Wimbledon Greyhound Stadium, sharing technical information on exploring a route pertinent to improving links for the Wandle Valley Regional Park, holding a workshop on gypsies and travellers and flooding matters. (see the appendices of this report for more information)

4.35 As Wandsworth Council has also been revising its Local Plan to similar timescales as Merton, and as both councils share a boundary with Wimbledon Greyhound stadium, Wandsworth and Merton Councils have continued to share information and explore co-operation. Specific meetings were held on 08 September 2012 and 06 September 2013, with ongoing dialogue via phone and in writing in response to Local Plan consultation stages.

Lambeth Council
4.36 Merton shares a small border with Lambeth and, like Sutton, the existing development patterns in both boroughs (largely pre and inter war residential streets) give much more limited scope for land designations and development changes.

4.37 Lambeth had just started revising its Local Plan within the same year as Merton. Common issues identified at the meeting between the two boroughs that took place on 25 July 2012 were largely focussed on gypsies and travellers (dealt with elsewhere in this report) as well as general information sharing on school places, flood risk assessments.

**Kingston Council**

4.38 Kingston and Merton Councils met on 11 July 2012. Kingston and Merton’s border is very close to the A3 road and thus the scope for development and shared land designations is significantly restricted by this large and busy road.

4.39 Aside from gypsies and travellers (which is explained elsewhere in this report) the main issues of co-operation between Kingston and Merton were largely beyond the scope of Merton’s *Sites and Policies Plan* being the extent of Crossrail 2, working together on the South London Waste Plan Authority Monitoring Report and cross boundary planning application matters.

4.40 During 2013, Kingston and Merton Councils have kept in touch on cross-boundary planning application issues and also on site 37 Wimbledon Greyhound Stadium, as AFC Wimbledon, one of the potential developers of the greyhound stadium, is currently based in Kingston.

**Other co-operation undertaken**

4.41 Merton Council also offered co-operation via specific correspondence to Croydon Council. However it was decided that a specific meeting was unnecessary as matters could be dealt with either by phone or in writing, or at many of the pan-London or South London Partnership meetings that both boroughs attend.

4.42 In 2012, Croydon was submitting its Core Planning Strategy and during 2013 has been working on specific plans for the regeneration of Croydon town centre. Like Sutton and Lambeth, the borders of Croydon and Merton have more limited scope for development and both boroughs were already in agreement on shared land use designations.

4.43 Merton also offered specific co-operation to Network Rail and the Greater London Authority (in addition to the standard engagement on consultation stages and on specific sites) Co-operation has also taken place with Kent County Council, most recently in July 2013, on waste management matters (outside the scope of Merton’s *Sites and Policies Plan.*) The GLA’s recent correspondence (September 2013) confirms that
Merton’s *sites and Policies Plan* is in general conformity with the Mayor’s London Plan. More information is available on these matters on request.

**Strategic cross boundary issue 7: Wandle Valley Regional Park**

4.44 The Wandle Regional Valley Park (Regional Park) runs through the centre of Merton and a number of neighbouring boroughs (Wandsworth, Sutton and Croydon). The Park is not intended to relate purely to green infrastructure; as outlined in Merton’s Core Planning Strategy policy CS5, it has significant industrial heritage, business and employment focus and town centre regeneration potential as well.

4.45 Therefore, it is easy to see that taken as a whole the regional park represent a strategic opportunity for south London. The Wandle Valley Regional Park is set out in the Mayor’s London Plan and in Merton’s Core Planning Strategy policy CS5. It is also referred to in the adopted Local Plans of Wandsworth, Sutton and Croydon.

4.46 By 2011 an indicative boundary for the park had been agreed between the four boroughs via their representation on the Wandle Valley Regional Park Trust. This boundary is illustrated in Merton’s Core Planning Strategy 2011. However to date only Sutton Council has included it within their Policies Map.

4.47 Merton Council liaised with Sutton, Croydon and Wandsworth and the chief executive of the Wandle Valley Regional Park Trust on preparing the Park boundary set out in Merton’s submission Policies Map. Criteria for including or excluding specific sites (for example, homes or pubs) had not been defined by either the Trust or any other council, so Merton defined a series of criteria in co-operation with the other bodies, applied them to create a boundary in Merton, then sought agreement with other boroughs and the Chief Executive of the Trust.

**Outcomes attributed to co-operation**

4.48 Co-operating with Sutton, Wandsworth and Croydon and the Wandle valley Regional Park Trust has enabled Merton to identify and define criteria for setting the Wandle Valley Regional Park boundary at a local level on Merton’s Policies Map. Defining the boundary by applying criteria has helped to explain to residents and other stakeholders how the boundary has been defined and will hopefully act as a template for other boroughs in including the boundary in their Policies Map.
Strategic cross boundary issue 8: Flood Management

4.49 URS consultants working with the Environment Agency, the borough of Merton, Sutton and Croydon carried out a Strategic Flood Risk Assessment (SFRA) in 2008 and 2009.

4.50 In accordance with the Government’s flood risk policies, the primary objective of the study was to enable the four participating London boroughs to undertake Sequential Testing. The NPPF and associated technical guidance sets out the national policy position for development in relation to flood risk.

4.51 It carries forward the requirement of the NPPF and the Flood and Water Management Act 2010 to undertake a Strategic Flood Risk Assessment (SFRA), emerging Surface water management plan, Preliminary flood risk assessment and flooding modelling in the borough to inform the preparation of the Local Plan. In addition to this, Merton participates in ‘Drain London’ project which was set up by the Mayor of London in partnership with the Environment Agency and local boroughs.

In addition, Merton participates and is an active member of Drain London project set up by the Mayor of London in partnership with the Environment Agency, Thames Water and London boroughs. This partnership provides an opportunity to engagement not only other boroughs but with statutory bodies.

4.52 The project is split into sub regional groups; Merton is in sub regional group 7. This group includes the London boroughs of Lambeth, Sutton, and Southwark as well as representatives from the Environment Agency, Thames Water and the GLA.

4.53 The project advises and provides help for London boroughs on ways to manage and reduce surface water flood risk in London by; improving our knowledge of the surface water drainage system and identifying areas at greatest risk of flooding.

4.54 Furthermore, the council has taken advantage of the project’s forums which provide an additional engagement mechanism to help boroughs with their responsibilities for managing flood risk by; providing guidance on asset registers, helping to form multi-agency partnerships and sharing good practice, knowledge and expertise.

4.55 In line with the ‘Duty to Co-operate, Merton Council engaged with neighbouring boroughs on all matters relating to flooding and water management through the preparation of Merton’s Local Plan. The partnership working and consultation work is one that will be on going for future projects for example assessing and updating the SFRA with neighbouring boroughs. The council is also exploring setting up a subregional SuDS Management Board, sharing resources across other south London councils to assess SuDS applications.
4.56 Outcomes attributed to co-operation: The advice and evidence from the Environment Agency has informed the flooding polices and informed the sites allocations uses. This co-operation with the Environment Agency and Thames Water has lead to the refinement of the flooding policies, site allocations and in directly informed other polices in the local plan. Please see appendix C: Map of flooding areas in Merton.

4.57 Strategic cross boundary issue: transport planning and delivery. The Mayor of London co-ordinates transport planning and delivery via Transport for London. The Mayor’s Transport Strategy is the pan-London strategic transport plan for Merton. All London boroughs have to prepare a local Sustainable Transport Strategy and Local Implementation Plan (LIP), setting out how that borough can contribute to the Mayor’s transport Strategy and deliver its transport objectives.

Merton’s Sustainable Transport Strategy and LIP 2011-31 was approved by Transport for London on 23 April 2012 as being in line with the Mayor’s Transport Strategy for London [http://www.merton.gov.uk/transport-streets/transportplanning/lip.htm](http://www.merton.gov.uk/transport-streets/transportplanning/lip.htm) and the most recent LIP delivery plan refresh is being prepared (September 2013).
Other Local Plan-related co-operation

4.58 Merton Council fulfils the duty to Co-operate across a number of areas that touch on, but are not the principle focus of Merton’s Site and Policies Plan and Policies Map.

4.59 **Waste management:** Merton Council has produced a joint development plan document, the South London Waste Plan (March 2012) with Croydon, Sutton and Kingston. The four councils also co-operate annually on the South London Waste Plan authorities monitoring report.

4.60 Some movement of waste between local authority areas is inevitable given the operation of the market and the geographical spread of waste management facilities. Therefore the councils continuously co-operate with other councils outside the waste plan area. The most recent example of this is exchange of information between Merton Council and Kent County Council on waste arisings tonnage and disposal.

4.61 **Public health** Since April 2013, the responsibility for public health has been transferred to local authorities after the Primary Care Trust ceased to operate. Merton Council is now able to work more closely in partnership with the support of Merton Clinical Commissioning Group, which works with local health practitioners including GPs and nurses.

4.62 For the purposes of health related policies in the emerging Merton Local Plan, the Duty to Co-operate is considered to be most relevant where strategic level co-operation can result in the best and most effective way of utilising existing and proposed services.

4.63 The Public Health functions for Merton is now part of the council. The independent Health and Wellbeing Board addresses health issues in Merton through the independent health and wellbeing board which consists of councillors, health professionals, voluntary organisations and GPs. It is chaired by the Cabinet Member for Health and Adult Social Care.

4.64 As part of the process of adopting a Local Plan, the council engaged with the former PCT, National Health Directorate, NHS south London and various specialise teams within the NHS on matters of Health and Wellbeing, GP provision and local community health provision.

4.65 **Policy outcome:** Health care (NHS and Merton Public Health) providers have helped to ensure that the local plan addresses health and wellbeing impacts not just within the support for infrastructure polices but within other polices for example open space, retail and centres policies (Food and drink/leisure and entertainment use). This cooperation with the Health care providers, internal council departments and other external organisations has lead to the refinement of health related policies within the emerging local plan.
5 Conclusion

5.1 Merton Council has always engaged constructively and on an ongoing basis with relevant authorities and bodies that have an interest in delivering the policies relating to identified cross boundary strategic issues.

5.2 As part of the area covered by the Greater London Authority and the Mayor of London, a statutory tier of regional planning remains in place and it is in boroughs’ interests to

5.3 Consequently, although section 33A of the PCPA 2004 and the ‘Duty to Co-operate’ requirement came into force in 2011, it is considered that Merton Council has demonstrated, up-to this stage of the Local Plan, has met and possibly exceeded this requirement.

5.4 Merton’s Local Plan reflects the various views and outcomes of these different processes and activities. This ‘Duty to Co-operate’ Statement is a live document and will provide a clear audit trail of co-operation with other organisations involved in generating the Local Plan’s objectives.
6 Appendix A: Meeting held and outcomes

6.1 This section set out the issues discussed and outcomes with Merton’s neighbouring authorities:
- London Borough of Croydon
- London Borough of Sutton
- London Borough of Lambeth
- London Borough of Wandsworth
- The Royal Borough of Kingston upon Thames

6.2 The comments are separated by authority and divided into strategic and local significant issues that have been identified through discussions. The table at the end of each section draws together all of the issues and summarises any actions resulting from comments and discussion.
<table>
<thead>
<tr>
<th>Authority</th>
<th>Date</th>
<th>Key point of discussion</th>
<th>Outcome/action of engagement</th>
</tr>
</thead>
<tbody>
<tr>
<td>London Borough of Croydon</td>
<td>Agreed that no meeting necessary in addition to South London Partnership and pan-London meetings and gypsy and traveller workshop. Recent correspondence in August and September 2013 has related to the production of Croydon’s Local Plan</td>
<td>Gypsies and travellers</td>
<td>Gypsy and traveller co-ordination South London Waste Plan AMR Croydon’s local plan (strategic views and open space designations (September 2013)</td>
</tr>
<tr>
<td>London Borough of Lambeth</td>
<td>25(^{th}) July 2012</td>
<td>Update on plan-making progress in each borough Approach to affordable rent New Government guidance on Gypsies and Travellers School places need and meeting the need Flooding risk management and the SFRA Community Infrastructure Levy Neighbourhood planning</td>
<td>Establish that both boroughs Local Plan timetable likely to be the same. Both boroughs agreed to maintain and continue engagement on each others Local Plan. Merton to organise southwest London planning officer meeting towards ensuring a consistent approach towards the methodology and evidence from the G&amp;T government guidance. Issue to be raised at the next ALBPO meeting. Ensure that the borough education teams are in continuous contact regarding educational needs in each others borough. Maintain and continue engagement between borough on each others CIL timetable and other issues relating to CIL progress. Lambeth, informed Merton it is undertaking SFRA with URS in summer / autumn 2012 will</td>
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London Borough of Sutton  

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<tr>
<th>Date</th>
<th>Description</th>
<th>Merton to maintain and continue communication with Sutton on any available updates on the Employment Land study relation to Willow Lane Industrial Estate. Merton to continuing updating Sutton on Rainbow Industrial Estate and provide Sutton with Workspace justification on their proposals for Rainbow at Merton’s Core Planning Strategy Examination (2011). Sutton request that Merton’s Green Chains and Corridors on the Police’s Map line up beyond Merton’s borough boundary. Sutton formally provide Merton with comments concerning the consideration of additional access in relation to any proposed development proposals for Willow Lane Industrial Estate to help ease the impact or risk of increased traffic on Goat Road. Merton to organise a joint meeting with neighbouring boroughs to explore and discuss the topic of Gypsies and Travellers and needs assessment research. Merton and Sutton to jointly explore the scope and mechanism for a shared approach to decentralised energy networks and carbon off-setting. Joint exploratory research on the provision of care home. Sutton has identified an issue in</th>
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<tbody>
<tr>
<td>9&lt;sup&gt;th&lt;/sup&gt; July 2012</td>
<td>Update on plan-making progress in each borough Approach to affordable rent New Government guidance on Gypsies and Travellers School places need and meeting the need. Community Infrastructure Levy South West London Waste Plan Neighbourhood Planning Sutton's Hackbridge Regeneration Plan</td>
<td>include the Graveney River near boundary with Merton.</td>
</tr>
<tr>
<td>Location</td>
<td>Date</td>
<td>Notes</td>
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</tr>
</tbody>
</table>
| London Borough of Wandsworth  | 9th August  | Update on plan-making progress in each borough  
Update on boroughs local plans.  
Approach to affordable rent  
New Government guidance on Gypsies and Travellers  
School places need and meeting the need.  
Wandsworth Flood Alleviation Scheme and other cross boundary flooding issues.  
Wandle Valley Area Framework – cross boundary north Wimbledon (in Merton Borough) and Earlsfield (in Wandsworth borough).  
Community Infrastructure Levy  
Neighbourhood Planning  
Waste planning                                                                                                                                                                                                                                                                                                                                 |
| Sutton regarding care homes.  |             | Progress on establishing Merton’s SAB (SuDS Approval Board). Merton to update Wandsworth on the progress.  
Wandle Valley/Wandle and area known as ‘Missing Link’:  
Merton council officers to liaise with Wandsworth (planning) on work already undertaken.  
Merton to establish a joint meeting of neighbouring south London boroughs to jointly explore, identify and agree approaches and options to meeting requirements of the March 2012 Guidance entitled Planning for traveller sites  
(Invitation for meeting scheduled on 21st August sent out on 13th August 2012 to all neighbouring south London boroughs).  
Regarding Wimbledon Greyhound Stadium- Merton to provide Wandsworth with electronic copies of responses received by Merton on the Greyhound Stadium site.                                                                                                                                                                                                 |
| Royal Borough of Kingston upon Thames | 11th July 2012 | Update on plan-making progress in each borough  
Community Infrastructure Levy  
Approach to affordable rent                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|                               |             | Further engagement with both boroughs education and planning team regarding the extent of Kingston’s identified school places need.  
.                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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<th></th>
<th>New Government guidance on Gypsies and Travellers</th>
<th>Merton to convey Kingston’s query regarding the extent of Transport Proposal 04TN ‘Chelsea Hackney Line’ to Transport Planners. Crossrail Option B is likely to require additional land to be safeguarded. Transport planners’ response to be sent to Kingston. Merton to contact all boroughs part of the south west London waste plan area proposing Duncan Clarke carry out the Waste plan AMR 2012. Merton to confirm that the borough has been formally consulted on the ‘Tolworth Bowling Alley’ planning application. Merton to organise a joint meeting with neighbouring boroughs to explore and discuss the topic of Gypsies and Travellers and needs assessment research.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>School places need and meeting the need. Flood Risk issues and SFRA Potential site allocations sites near neighbouring Kingston borough: Rainbow Industrial Estate Site Ref: 48 Land at Bushey Road, SW20 0JH Open Space AFC Wimbledon Footballs club South West London Waste planning</td>
<td></td>
</tr>
</tbody>
</table>

Copies of the letters, maps and tailored information exchanged with neighbouring boroughs can be found below
Dear Steve,

Re: Have your say on Merton’s draft Sites and Policies DPD, Proposals Map - duty to co-operate

I am writing to let you know that public consultation on the latest phase of Merton’s Local Development Framework started on Wednesday 13 June on an additional 15 potential development sites as part of the Sites and Policies Development Plan Document.

I am also writing to invite you to comment on the previous stage of Merton’s Sites and Policies DPD and Proposals Map DPD (preferred options) as we have not had a response from you to date. All documents are also available via Merton’s website here: http://www.merton.gov.uk/environment/planning/planningpolicy.htm

I am attaching an indicative map to illustrate some of the main features that are within reasonable distance to the boundary between Merton and Croydon to highlight some of the issues that you may be interested in.

Potential sites in Stages 2 and 2a

A site that is close to the boundary between Merton and Croydon that you may be interested in is:

Site 81: Moat Housing Estate, Pollards Hill – this is a large site (approx 15ha) where a masterplan is being proposed by its owners, Moat Housing, for some infill development with longer term aspirations for comprehensive redevelopment.

There are other sites which appear in the draft Sites and Policies DPD (stages 2 and 2a); please do not hesitate to comment on any of these.

Draft planning policies

Merton’s Core Planning Strategy was adopted in July 2011 and Croydon’s Core Strategy is moving towards adoption. Together with Kingston and Sutton, Merton and Croydon have an adopted Joint Waste DPD (the South London Waste Plan). Merton’s Sites and Policies DPD focuses on similarly detailed matters to the emerging Croydon Development Management and Site Allocations DPD, which is moving towards preferred options. There will be many common issues between both our emerging DPDs, particularly as general conformity with the London Plan applies to both.

While all Merton’s draft policies may be of interest to you I would especially like to hear your views on Merton’s draft policy DM.EP1 (opportunities for decentralised energy networks) found in Stage 2 of Merton’s Sites and Policies DPD and DM.H3 (support for affordable housing) found in Stage 2a.
Proposals map designations – draft

There are a number of proposed designations on Merton’s draft Proposals Map that you may be interested in commenting on. The attached map illustrates some that adjoin the Croydon / Merton border. The boroughs have been working jointly on the Wandle Valley Regional Park for some time.

- **Town centre boundaries** – we are proposing to refocus the Colliers Wood and Mitcham town centre boundaries within the core of each town centre; on the adopted Proposals Map they are quite widely drawn. The new proposals are contained within Stage 2 of the DPD. There are also changes proposed to the extent of the shopping frontages in all town centres.
- **Open spaces and natural environment designations** – we are updating the proposals map to take account of open spaces, SINCs and other biodiversity designations, in general conformity with the London Plan 2011 and national policy.
- **Industrial areas** - Merton is not proposing any significant changes to Strategic Industrial Locations near Croydon or in general.
- **Flooding** – is based on the Environment Agency data. I would welcome your feedback on any further flood risk assessments you are undertaking.
- **Transport** following the publication of Transport for London’s indicative tramlink proposals, in Stage 2a we are proposing to remove the Tooting to Sutton tramline safeguarding that we published in Stage 2. However the Morden-Sutton Light rail service (Merton’s proposal 6TN) is being retained.

As well as the issues raised in the DPD, I would appreciate feedback from you as to Croydon’s approach to planning for **gypsies, travellers and travelling showpeople**. I think it would be useful to hold a meeting with yourselves and other south London boroughs on a shared approach to the March 2012 government guidance.

Given the number of potential issues, I would appreciate receiving your response by Monday 27 August 2012. It might be easiest to meet to discuss matters, particularly those relating to specific designations. If you agree, please do not hesitate to contact me using the details on this letter.

Yours sincerely,

Tara Butler
Programme Manager – Strategic Policy and Research
Future Merton
Dear Chris,

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I am also writing to invite you to comment on the previous stage of Merton’s Sites and Policies DPD and Proposals Map DPD (preferred options) as we have not had a response from you to date. All documents are also available via Merton’s website here: [http://www.merton.gov.uk/environment/planning/planningpolicy.htm](http://www.merton.gov.uk/environment/planning/planningpolicy.htm)

I am attaching an indicative map to illustrate some of the main features that are within reasonable distance to the boundary between Merton and Kingston to highlight some of the issues that you may be interested in.

**Potential sites in Stages 2 and 2a / Rainbow Industrial Estate SPD**

A site that is close to the boundary between Merton and Kingston that you may be interested in is:

**Site 48: Land at 80-88 Bushey Road, Raynes Park, SW20 0JH** — a 3.7ha site, currently a locally significant industrial area which is proposed for employment led regeneration which may include industrial type uses mixed with bulky goods retail, residential, car showroom and education. (NB this site is proposed in Stage 2 of Merton’s Sites and Policies DPD)

There are other sites which appear in the draft Sites and Policies DPD (stages 2 and 2a); please do not hesitate to comment on any of these.

In addition, the council is consulting on draft planning brief (supplementary planning document) for Rainbow Industrial Estate in Raynes Park. Although the supplementary planning document will be based from Merton’s Core Planning Strategy (and is therefore not part of the DPD), it is quite a large site that is reasonably close to the borough boundaries and is proposed for a mix of employment and residential. The consultation closes on 25 July 2012, the planning brief is available online via the same link [http://www.merton.gov.uk/environment/planning/planningpolicy.htm](http://www.merton.gov.uk/environment/planning/planningpolicy.htm) and I will send you a paper copy with this letter if you would like to review these proposals and consider whether or not to comment.

**Draft planning policies**

Kingston and Merton both have adopted Core Planning Strategies and, together with Croydon and Sutton, have an adopted Joint Waste DPD (the South London Waste Plan). Merton’s Sites and Policies DPD focuses on some detailed planning policy issues which Kingston covered in its Core Strategy.
There are many common issues between your adopted documents and Merton’s Sites and Policies DPD, particularly as general conformity with the London Plan applies to both.

While all Merton’s draft policies may be of interest to you I would especially like to hear your views on Merton’s draft policy DM.EP1 (opportunities for decentralised energy networks) found in Stage 2 of Merton’s Sites and Policies DPD and DM.H3 (support for affordable housing) found in Stage 2a.

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- **Open spaces and natural environment designations** – we are updating the proposals map to take account of open spaces, SINCs and other biodiversity designations, in general conformity with the London Plan 2011 and national policy.
- **Industrial areas** - while Merton is not proposing any significant changes to Strategic Industrial Locations, I would particularly appreciate your feedback on industrial and employment uses adjacent to the borough boundaries, such as around Willow Lane, which is very close to the Beddington industrial areas in Kingston.
- **Flooding** – is based on the Environment Agency data. I would welcome your feedback on any further flood risk assessments you are undertaking.
- **Transport** following the publication of Transport for London’s indicative tramlink proposals, in Stage 2a we are proposing to remove the Tooting to Sutton tramline safeguarding that we published in Stage 2. However the Morden-Sutton Light rail service (Merton’s proposal 6TN) is being retained. I would also appreciate your views on the potential access road from Carshalton Road to Willow Lane industrial estate, as shown on the indicative map and in Stage 2 as proposal 15TN

As well as the issues raised in the DPD, I have already received information from your colleague Duncan Clarke regarding Kingston’s emerging approach to gypsies, travellers and travelling showpeople; please pass on my thanks to Duncan for this proactive approach. I think it would be useful to hold a meeting with yourselves, other south London boroughs, and ourselves on a shared approach to the March 2012 government guidance and am suggesting this to Duncan.

Given the number of potential issues, I would appreciate receiving your response by Monday 27 August 2012. It might be easiest to meet to discuss matters, particularly those relating to specific designations. If you agree, please do not hesitate to contact me using the details on this letter.

Yours sincerely,

Tara Butler
Programme Manager – Strategic Policy and Research
Future Merton
Agenda for meeting

1. Update on plan-making progress from each borough, including CIL
2. Approach to affordable rent
3. Gypsies and travellers - approach to new government guidance
4. School places: need and how each borough is meeting it
5. Proposals Sites: Merton - Rainbow Industrial Estate and Bushey Road / Kingston
6. Open Space
7. AFC Wimbledon
8. Waste planning
9. Any Other Business

Present: LBM: VM, EW.

RBK: Duncan Clarke; Chris Berry

Actions

1. Eben to discuss extent of Kingston’s identified school places need with Alex.

2. Eben to convey Kingston’s query regarding the extent of Transport Proposal 04TN ‘Chelsea Hackney Line’ to Transport Planners. Crossrail Option B is likely to require additional land to be safeguarded. Transport planners’ response to be sent to Kingston.

3. Chris to email all South London Waste Plan boroughs proposing that Duncan Clarke form Kingston do the 2012 update to Waste Plan’s AMR.

4. Chris / Duncan – to confirm whether LBM have been formally consulted on the Tolworth Bowling Alley planning application.

5. Val to organise a joint meeting with neighbouring boroughs to explore and discuss the topic of Gypsies and Travellers and needs assessment research.
Dear Alan,

Re: Have your say on Merton's draft Sites and Policies DPD, Proposals Map - duty to co-operate

I am writing to let you know that public consultation on the latest phase of Merton's Local Development Framework started on Wednesday 13 June 2012 on an additional 15 potential development sites as part of the Sites and Policies Development Plan Document. I am also writing to invite you to comment on the previous “preferred options” stage of Merton’s Sites and Policies DPD.

Apologies for not contacting you before now. We have carried out an initial assessment and mapping exercise to try and identify issues in common or that might impact Lambeth and it appears at this stage as if there may be fairly limited issues.

All of Merton’s documents are available online here:
http://www.merton.gov.uk/environment/planning/planningpolicy.htm

I am attaching an indicative map to illustrate some of the main features that are within reasonable distance to the boundary between Merton and Lambeth to highlight some of the issues that you may be interested in.

Potential sites in Stages 2 and 2a

It seems to me that there aren’t currently any potential sites in Stages 2 or 2a where their reallocation or redevelopment would have an impact on Lambeth, as you can see from the indicative map.

Site 81: Moat Housing Estate, Pollards Hill – although closer to the borough boundary between Merton and Croydon, this is a large site (approx 15ha) where a masterplan is being proposed by its owners, Moat Housing, for some infill with longer term aspirations for comprehensive redevelopment.

There are other sites which appear in the draft Sites and Policies DPD (stages 2 and 2a); please do not hesitate to comment on any of these.

Draft planning policies

Lambeth and Merton both have adopted Core Planning Strategies since 2011. There are many common issues between our adopted documents, particularly as general conformity with the London Plan applies to both.

While all Merton’s draft development management policies may be of interest to you I would especially like to hear your views on Merton’s draft policy DM.H3 (support for affordable housing) found in Stage
2a. You may also be interested in DM.EP1 (opportunities for decentralised energy networks) found in Stage 2 of Merton’s Sites and Policies DPD.

Proposals map designations – draft

It seems to me that there are relatively few (if any) proposed designations on Merton’s draft Proposal Map that may have an impact on Lambeth. The attached map illustrates some that adjoin the Lambeth Merton border.

- Open spaces and natural environment designations – we are updating the proposals map to take account of open spaces, SINCs and other biodiversity designations, in general conformity with the London Plan 2011 and national policy.
- Transport following the publication of Transport for London’s indicative tramlink proposals, in Stage 2a we are proposing to remove the Tooting to Sutton tramline safeguarding that we published in Stage 2. However the Morden-Sutton Light rail service (Merton’s proposal 6TN) is being retained. Do you have any tramlink or rail based services proposed for Lambeth?

As well as the issues raised in the DPD, I would appreciate feedback from you as to Lambeth’s approach to planning for gypsies, travellers and travelling showpeople. Merton’s Core Planning Strategy has a criteria-based policy for gypsy and traveller site provision and we are currently undertaking further needs assessment. I think it would be useful to hold a meeting with yourselves and other south London boroughs on a shared approach to the March 2012 government guidance.

We are also undertaking early work on Merton’s Community Infrastructure Levy and would be interested to find out your progress on this issue at Lambeth.

Given the number of potential issues, I would appreciate receiving your response by Monday 27 August 2012. It might be easiest to meet to discuss matters, particularly those relating to specific designations. If you agree, please do not hesitate to contact me using the details on this letter.

Yours sincerely,

Tara Butler
Programme Manager – Strategic Policy and Research
Future Merton

Enc: illustrative map showing proposed sites and Proposals Map designations within 500m of the Merton-Lambeth border

Present
LBM: Tara Butler; Valerie Mowah;
LBL: Alan Vinall; Catherine Carpenter

Agenda
1. Update on plan-making progress from each borough
2. Approach to affordable rent
3. Gypsies and Travellers - approach to new government guidance
4. School places: need and how each borough is meeting it
5. SFRA / Flooding
6. CIL
7. Neighbourhood Planning
8. AOB –

Actions
- **Plan making:** LBM and LBL to keep in touch on plan making progress – LBL’s next consultation on their “Local Plan” is likely to be at a similar time to LBM’s potential consultation on their draft Sites and Policies DPD (circa Nov-Dec 2012)
- **Gypsies and travellers** – Val Mowah organising southwest London planning officer meeting towards ensuring a consistent approach towards the methodology and evidence from the G&T government guidance. May also be worth raising at ALBPO
- **School places** – if borough’s Education officers are not already in contact, exchange contact names
- **CIL** – exchange contact names for CIL: Merton’s contact for CIL preparation is Claire O’Donovan 020 8545 3587; claire.odonovan@merton.gov.uk
- **Flooding:** LBL undertaking SFRA with URS in summer / autumn 2012, will include the Graveney river near boundary with Merton.
Dear Sally,

Re: Have your say on Merton’s draft Sites and Policies DPD, Proposals Map - duty to co-operate

I am writing to let you know that public consultation on the latest phase of Merton’s Local Development Framework started on Wednesday 13 June 2012 on an additional 15 potential development sites as part of the Sites and Policies Development Plan Document.

I am also writing to invite you to comment on the previous stage of Merton’s Sites and Policies DPD and Proposals Map DPD (preferred options) as we have not had a response from you to date. All documents are also available via Merton’s website here: http://www.merton.gov.uk/environment/planning/planningpolicy.htm

I am attaching an indicative map to illustrate some of the main features that are within reasonable distance to the boundary between Merton and Sutton to highlight some of the issues that you may be interested in.

Potential sites in Stages 2 and 2a

A site that is close to the boundary between Merton and Sutton that you may be interested in is:

Site 36: Chaucer Centre, Canterbury Road, Morden SM4 6QB – currently mostly used as a training centre, proposed for a mix of residential and community uses (NB: this site is allocated for the same uses in Merton’s UDP 2003)

Site 81: Moat Housing Estate, Pollards Hill – although closer to the borough boundary between Merton and Croydon, this is a large site (approx 15ha) where a masterplan is being proposed by its owners, Moat Housing, for some infill with longer term aspirations for comprehensive redevelopment.

There are other sites which appear in the draft Sites and Policies DPD (stages 2 and 2a); please do not hesitate to comment on any of these.

Draft planning policies

Sutton and Merton both have adopted Core Planning Strategies and, together with Croydon and Kingston, have an adopted Joint Waste DPD (the South London Waste Plan). Merton’s Sites and Policies DPD focuses on similarly detailed matters to the Sutton Site Development Policies DPD, which Sutton adopted in March 2012. There are many common issues between your adopted documents and Merton’s Sites and Policies DPD, particularly as general conformity with the London Plan applies to both
While all Merton’s draft policies may be of interest to you I would especially like to hear your views on Merton’s draft policy DM.EP1 (opportunities for decentralised energy networks) found in Stage 2 of Merton’s Sites and Policies DPD and DM.H3 (support for affordable housing) found in Stage 2a.

**Proposals map designations – draft**

There are a number of proposed designations on Merton’s draft Proposals Map that you may be interested in commenting on. The attached map illustrates some that adjoin the Sutton / Merton border. The boroughs have been working jointly on the Wandle Valley Regional Park for some time.

- **Town centre boundaries** – we are proposing to refocus the Colliers Wood and Mitcham town centre boundaries within the core of each town centre; on the adopted Proposals Map they are quite widely drawn. The new proposals are contained within Stage 2 of the DPD. There are also changes proposed to the extent of the shopping frontages in all town centres.

- **Open spaces and natural environment designations** – we are updating the proposals map to take account of open spaces, SINCs and other biodiversity designations, in general conformity with the London Plan 2011 and national policy.

- **Industrial areas** - while Merton is not proposing any significant changes to Strategic Industrial Locations, I would particularly appreciate your feedback on industrial and employment uses adjacent to the borough boundaries, such as around Willow Lane, which is very close to the Beddington industrial areas in Sutton.

- **Flooding** – is based on the Environment Agency data. I would welcome your feedback on any further flood risk assessments you are undertaking.

- **Transport** following the publication of Transport for London’s indicative tramlink proposals, in Stage 2a we are proposing to remove the Tooting to Sutton tramline safeguarding that we published in Stage 2. However the Morden-Sutton Light rail service (Merton’s proposal 6TN) is being retained. I would also appreciate your views on the potential access road from Carshalton Road to Willow Lane industrial estate, as shown on the indicative map and in Stage 2 as proposal 15TN

As well as the issues raised in the DPD, I would appreciate feedback from you as to Sutton’s approach to planning for gypsies, travellers and travelling showpeople. Merton’s Core Planning Strategy has a similar policy to Sutton’s Site Development Policy DPD (policy DM28) to set criteria for gypsy and traveller site provision; however I think it would be useful to hold a meeting with yourselves and other south London boroughs on a shared approach to the March 2012 government guidance.

Given the number of potential issues, I would appreciate receiving your response by Monday 27 August 2012. It might be easiest to meet to discuss matters, particularly those relating to specific designations. If you agree, please do not hesitate to contact me using the details on this letter.

Yours sincerely,

Tara Butler
Programme Manager – Strategic Policy and Research
Future Merton
Merton & Sutton ‘duty to co-operate’ meeting, 9th July 2012. Venue: Merton Civic Centre.

Present

LBM: Tara Butler; Valerie Mowah;
LBS: Sally Blomfield; Keith Fraser; Patrick Whitter

Agenda

1. Update on plan-making progress from each borough
2. Approach to affordable rent
3. Gypsies and Travellers - approach to new government guidance
4. School places: need and how each borough is meeting it
5. SFRA / Flooding
6. CIL
7. Waste planning
8. Neighbourhood Planning
9. AOB – Hackbridge Regeneration Plan

Actions

Val to convey to Employment Policy Lead Officer, request from Sutton for any available updates on the Employment land Study particularly in relation to Willow Lane Industrial Estate and also supporting case Workspace Group made to justify their proposals for Rainbow Industrial Estate at LBM’s Core Strategy Examination.

Eben to check that the Green Chains and Corridors set out on the proposals map line up beyond LBM borough boundary.

Sally to formally provide Merton with comments concerning the consideration of additional access in relation to any proposed development proposals for Willow Lane Industrial Estate to help ease the impact or risk of increased traffic on Goat Road.

Val to send Keith an electronic link to the online calculator and explanatory note regarding affordable housing 20% cash in lieu requirements.
Merton & Sutton ‘duty to co-operate’ meeting, 9th July 2012. Venue: Merton Civic Centre.

Val / Tara to set up meeting with all neighbouring boroughs to discuss the cross borough issues concerning Gypsies and Travellers.

Merton and Sutton to jointly explore the scope and mechanism for a shared approach to decentralised energy networks and carbon off-setting.

Keith to liaise with Val separately to explore the issues Sutton have in relation to care homes.
Dear Martin,

Re: Have your say on Merton’s draft Sites and Policies DPD, Proposals Map - duty to co-operate

I am writing to let you know that public consultation on the latest phase of Merton’s Local Development Framework started on Wednesday 13 June on an additional 15 potential development sites as part of the Sites and Policies Development Plan Document.

I am also writing to invite you to comment on the previous stage of Merton’s Sites and Policies DPD and Proposals Map DPD (preferred options) as we have not had a response from you to date.

I am attaching an indicative map to illustrate some of the main features that are within reasonable distance to the boundary between Merton and Wandsworth to highlight some of the issues that you may be interested in.

Potential sites

Some of the sites with potential for redevelopment and reallocation that you may be interested in are:

- **Site 37 Wimbledon Greyhound Stadium**: proposed for two different uses by different organisations: for residential led mixed use regeneration (Stage 2 January-April) and for redevelopment to a Greyhound Stadium plus supermarket. Neither of these is Merton Council’s preferred option. This is a large site adjoining Wandsworth and any redevelopment proposal may be of interest to you. I would appreciate your views.

- **Sites 64 (12a Ravensbury Terrace) and Site 70 (Haslemere Industrial Estate)**: although these sites are smaller, they are very close to the border of Wandsworth with Earlsfield. Both proposals suggest residential elements. The council’s preferred option is that a mixed use employment / residential scheme may be suitable for Site 64 but that site 70 should remain in employment use. The submission for Site 70 has told us that local residents have objected to heavy vehicles accessing the site along residential roads, and encloses a letter from Wandsworth Council which raises these concerns. I would like to discuss this with you.

There are other sites which appear in the draft Sites and Policies DPD (stages 2 and 2a); please do not hesitate to comment on any of these.

Draft planning policies

Merton and Wandsworth both have adopted Core Planning Strategies and Wandsworth has adopted development management and site allocations DPDs in February 2012. Merton’s Sites and Policies DPD
focusses on similarly detailed matters to the latter DPDs. There are many issues in common between your adopted documents and the Sites and Policies DPD, particularly as general conformity with the London Plan applies to both

While all Merton’s draft policies may be of interest to you I would especially like to hear your views on Merton’s draft policy DM.EP1 (opportunities for decentralised energy networks) found in Stage 2 of Merton’s Sites and Policies DPD and DM.H3 (support for affordable housing) found in Stage 2a.

Proposals map designations – draft

There are a number of proposed designations on Merton’s draft Proposals Map that you may be interested in commenting on. The attached map illustrates some that adjoin the Wandsworth / Merton border. The boroughs have been working jointly on the Wandle Valley Regional Park for some time.

- **Town centre boundaries** – we are proposing to refocus the Colliers Wood and Mitcham town centre boundaries within the core of each town centre; on the adopted Proposals Map they are quite widely drawn. The new proposals are contained within Stage 2 of the DPD. There are also changes proposed to the extent of the shopping frontages in all town centres.

- **Open spaces and natural environment designations** – we are updating the proposals map to take account of open spaces, SINCs and other biodiversity designations, in general conformity with the London Plan 2011 and national policy.

- **Industrial areas** - while Merton is not proposing any significant changes to Strategic Industrial Locations, I would particularly appreciate your feedback on industrial and employment uses adjacent to the borough boundaries, such as Wandsworth riverside

- **Flooding** – is based on the Environment Agency data. I would welcome your feedback on any further flood risk assessments you are undertaking.

- **Tramlink** following the publication of Transport for London’s indicative tramlink proposals, in Stage 2a we are proposing to remove the Tooting to Sutton tramline safeguarding that we published in Stage 2

As well as the issues raised in the DPD, I would appreciate feedback from you as to Sutton’s approach to planning for **gypsies, travellers and travelling showpeople**. It may be useful to hold a meeting with yourselves and other south London boroughs on a shared approach to the March 2012 government guidance.

Given the number of potential issues, I would appreciate receiving your response by Monday 27 August 2012. It might be easiest to meet to discuss matters, particularly those relating to specific designations. If you agree, please do not hesitate to contact me using the details on this letter.

Yours sincerely,

Tara Butler
Programme Manager – Strategic Policy and Research
Future Merton
Andrew Wood (Future Merton)

From: Eben Van Der Westhuizen
Sent: 01 August 2012 15:08
To: 'kirsty.freely@kkp.co.uk'
Cc: Christine Parsloe
Subject: RE: Wandsworth Borough Council- Playing Pitch Strategy

Kirsty,

Tara Butler asked me to respond to your email below and can inform you that Christine Parsloe is heavily involved with the organising of the Olympics and will not be able to provide a response to you.

As part of our ‘duty to cooperate’ Merton will be working with Wandsworth on various matters, including those referred to in your email below.

You should be able to find details to all your questions in the following documents:

Merton’s Playing Pitch Study - June 2011
Merton’s Open Space Study - 2010-11
http://www.merton.gov.uk/environment/openspaces/moss/moss-docs.htm
Merton’s Draft Sites and Policies DPD (Stage 2) - http://www.merton.gov.uk/environment/planning/planningpolicy/ldf/sites_policies_dpd/sites_policies_stage_2.htm
Merton’s Draft Sites and Policies DPD (Stage 2a) - http://www.merton.gov.uk/environment/planning/planningpolicy/ldf/sites_policies_dpd.htm

The answers for questions 3 & 4 will be found in both Draft Sites and Policies DPDs but as we are still at a relatively early stage, we cannot provided you with projected dwelling numbers or details of leisure facilities for any of the proposal sites.

I trust this information will suffice.

Regards

Eben van der Westhuizen
Planner
Strategic Policy & Research
Environment & Regeneration Department
Merton Council
Tel: 020 8545 3814
Fax: 020 8545 3326
www.merton.gov.uk
Knight, Kavanagh & Page (KKP) is working with colleagues (led by Simon Ingyon, Head of Parks and Leisure Services) at Wandsworth Borough Council to prepare a Playing Pitch Strategy, which incorporates an audit of all outdoor sports facilities in the Borough. The Playing Pitch Strategy will address the following issues and requirements:

- Providing a comprehensive assessment of the supply of and demand for outdoor playing pitches (senior, intermediate, junior and mini) in Wandsworth, through the application of the Sport England Playing Pitch Model;
- An analysis of the quantity and quality of other outdoor sports facilities in the Borough;
- Advising on local standards of provision for planning purposes, for outdoor sports facilities;
- Considering the adequacy of existing provision against these standards;
- Making recommendations on appropriate strategy and policy responses;

As a neighbouring authority to Wandsworth, we are writing to seek your support for this important process and hope that are able to respond to the questions below:

1. Does the Council have a current Playing Pitch Strategy? *If so please could you attach this strategy to enable us to identify any key issues relevant to our work in Wandsworth (and for the purposes of this study only) or provide a brief summary of the emerging key issues.*

2. Please could you provide location information of pitches/facilities close to the border with Wandsworth which may impact upon use of pitches/facilities in Wandsworth?

3. Are there any current plans for new or improved outdoor sports facilities close to the boundaries with Wandsworth?

4. Are there any housing developments which are being planned close to the boundary of Wandsworth which may impact upon pitch/facility use in Wandsworth?

I very much look forward to receiving your response (please respond by Friday 17\textsuperscript{th} August 2012).

If you require any further information or wish to discuss any of the above further please do not hesitate to contact me.

Kind regards

Kirsty Freely
Senior Consultant
Knight, Kavanagh & Page
Tel: 0161 764 7040
Mobile: 07976 841893
Fax: 0161 764 7490
1-2 Frecheville Court, off Knowsley Street, Bury BL9 0UF
Website: [www.kkp.co.uk](http://www.kkp.co.uk) - sign up for KKP News, our FREE e-zine today!

... where integrity matters

KKP is a Sport England framework partner recommended for needs assessments, playing pitch strategies and sport specific facility strategies.

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Please consider the environment before printing this e-mail
Merton & Wandsworth ‘duty to co-operate’ meeting. 9th August 2012.
Venue: Wandsworth Council offices.

Present

LBM: Tara Butler; Valerie Mowah;
LBW: Martin Howell; John Stone; Adam Hutchings

Agenda

1. Update on plan-making progress from each borough
2. Approach to affordable rent
3. Gypsies and Travellers - approach to new government guidance
4. School places: need and how each borough is meeting it
5. SFRA / Flooding, including the Wandsworth Flood Alleviation Scheme
6. Wandle Valley Area Framework – link between north Wimbledon and Wandsworth (Earlsfield)
7. CIL
8. Neighbourhood Planning
9. AOB – waste planning;

Actions

TB/ VM to provide Merton DC Team Leader’s details to AH: Neil Milligan, Development Control Section Manager, 0208 545 3099, neil.milligan@merton.gov.uk).

Flooding / SUDs - AH to liaise with Neil Milligan, Merton DC manager or Mario Lecordier (Merton Traffic and Highways Manager 020 8545 3202 mario.lecordier@merton.gov.uk ) for details on progress concerning the establishment of Merton’s SUDs Management Board

Wandle Valley / Trail ‘missing link’ - Merton contact Chris Chowns (Future Merton, transport policy) to liaise with Wandsworth contacts (Rhian Williams – Planning; John Stone – Head of Forward Planning and Transportation ) on work already undertaken.

Gypsies and Travellers - VM to establish a joint meeting of neighbouring south London boroughs to jointly explore, identify and agree approaches and options to meeting requirements of the March 2012 Guidance entitled Planning for traveller sites (Invitation for meeting scheduled on 21st August sent out on 13th August 2012 to all neighbouring south London boroughs).

Site proposals in Merton, including Wimbledon Greyhound Stadium – TB to provide MH with electronic copies of responses received by LBM on this site for Wandsworth’s response on the Merton preferred options site proposals.
Dear Tara

Re: Have your say on Merton’s draft Sites and Policies DPD, Proposals Map- duty to Co-operate

I am writing in response to your letter of 24 June regarding consultation on the above documents and to our duty to co-operate meeting held on the 9 August. Overall, Wandsworth Council is supportive of this DPD.

There are however a number of issues the Council would like to raise on site –specific proposals closest to the borough boundary:

- **Site 37 Wimbledon Greyhound Stadium** The Council generally supports Merton Council’s preferred use of continuing sporting activity (D2 use). Intensification of this use is supported in principle insofar as it could meet the needs of a growing population, including Wandsworth residents. The degree of intensification would be subject to appropriate mitigation measures, including improved public transport and parking restraint, as the site has a low PTAL rating and could give rise to traffic problems within Wandsworth. Similarly large/intensive outdoor sports facilities that provide for visitors/stadia could also create problems with traffic/parking. If a more intensive indoor sport use is proposed, it should be acknowledged that this would be subject to impact testing as it is in an out-of-centre location. Other town centre uses, including large retail development would not be considered appropriate in this out-of-centre location, as they could give rise to trade draw from Tooting town centre and traffic generation. On cessation of a sporting use, industrial and warehousing uses would be appropriate as identified, however any such development should not jeopardise the adjacent Strategic Industrial Allocation. Any development of the site should also take into...
consideration the allocated waste site located to the west of the Greyhound Stadium. Details of the waste site are contained on page 163 of the Site Specific Allocations Document. The Council may object to development which may prejudice this site for waste use purposes. The Council’s Surface Water Management Plan indicates that the site lies within a Critical Drainage Area and surface water flooding is predicted to flood in the vicinity of Wimbledon Stadium Business Park and pond in Garratt Park which is located to the east of the river Wandle. Future joint working to explore flood risk alleviation is welcomed as part of the duties of the Flood and Water Management Act.

- **Site 70 (Haselmere Industrial Estate)** Whilst contiguous industrial use is acknowledged in new Site 70 (Haselmere Industrial Estate), it is considered that this should also be acknowledged for **Site 64 (12a Ravensbury Terrace)** which abuts a Locally Significant Industrial Area (LSIA) in Wandsworth. The Council would wish to see caveats included to ensure that the preferred use (which includes new housing) would include sufficient mitigation measures to avoid any conflicts with the industrial uses which could prejudice continuing industrial use/viability of the industrial uses within the Wandsworth LSIA. It is significant that this area also forms part of protected industrial land within the Wandle Valley and that Wandsworth is identified by the London Plan as a Restricted Transfer borough. It is considered that the preferred option is for a more intensively developed mixed use, including residential could give rise to other problems in particular potentially increasing the general traffic flow along residential roads. The Council is aware of traffic problems at Ravensbury Terrace and has held discussions with the Highways Team at Merton regarding implementation of width narrowing measures.

Regarding the removal of the tramlink route to Tooting from your plan, the Council have also assumed it unlikely in the timeframe of our current plan.

Yours sincerely

Sarah Dixey

Sarah Dixey
for Assistant Director (Planning and Environmental Services)
7 Appendix B:

7.1 As mentioned earlier in this the Localism Act requires local authorities to co-operate in respect of these strategic matters. The responses from these bodies can be viewed on Merton website and Merton’s Statement of Consultation document.

| Required bodies under the Localism Act | The council has actively engaged and co-operated with the Environment Agency by way of dialogue, meetings, public engagement and meetings with Merton Lead Local Flood Authority Management Steering group from the conception, of the plan up to submission of the sites and polices plan. Stage 2, 2a, 3 and stage 4 consultations All flood risk and water management issues within the borough and adjoining boroughs All sites allocations, flooding polices and other police in the sites and polices plan. This co-operation has assisted, influence, informed the Merton’s submission Sites and Polices; and Policies Map. |
| Environment Agency | |

| English Heritage | The council has actively engaged and co-operated with the English Heritage by way of dialogue, meetings and public engagement from the conception, of the plan up to submission of the sites and polices plan. Stage 2, 2a, 3 and stage 4 consultations All sites allocations, land designations, heritage asset management, conservations and design polices. This co-operation has assisted, influence, informed the Merton’s submission Sites and Polices; and Policies Map. |
| English Heritage | |

| Natural England | The council has engaged and actively co-operated with the Natural England by way of dialogue, meetings and public engagement from the conception, of the plan up to submission of the sites and polices plan. Stage 2, 2a, 3 and stage 4 consultations All sites allocations, land designations, green |
infrastructure and biodiversity issues and policies. This co-operation has assisted, influence, informed the Merton’s submission Sites and Polices; and Policies Map

<p>| The Mayor of London (including offices held by the Mayor) and Greater London Authority (GLA) | The council has actively engaged and co-operated with the GLA and offices held by the Mayor of London by way of dialogue, meetings, pan London forums/groups and public engagement from the conception, of the plan up to submission of the sites and polices plan. Stage 2, 2a, 3 and stage 4 consultations. All polices in the plan, land designations and all sites allocations. To ensure conformity with the London Plan. |
| Transport for London | The council has actively engaged and co-operated with Transport for London by way of dialogue, meetings and public engagement from the conception, of the plan up to submission of the sites and polices plan. Stage 2, 2a, 3 and stage 4 consultations. All polices in the plan, land designations including Transport networks and future transport network plans; and all sites allocations. Correspondence from the Greater London Authority |
| London Borough of Wandsworth | The council has actively engaged and co-operated with the London Borough of Wandsworth by way of dialogue, meetings (sub regional and pan London meetings) and public engagement from the conception, of the plan up to submission of the sites and polices plan. Stage 2, 2a, 3 and stage 4 consultations. All boundary issues relating to sites allocations, land designations including green infrastructure, biodiversity issues and other policies within the Sites and Policies Plan. This co-operation has assisted, influence, informed the Merton’s submission Sites and Polices; and Policies Map |
| London Borough of Croydon | The council has actively engaged and co-operated with the London Borough of Croydon by way of dialogue, meetings (sub regional and pan London meetings) and public engagement from the conception, of the plan up to submission of the sites and polices plan. Stage 2, 2a, 3 and stage 4 consultations. All boundary issues relating to sites allocations, land |</p>
<table>
<thead>
<tr>
<th>Designation</th>
<th>Details</th>
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<tr>
<td>London Borough of Sutton</td>
<td>The council has actively engaged and co-operated with the London Borough of Sutton by way of dialogue, meetings (sub regional and pan London meetings) and public engagement from the conception, of the plan up to submission of the sites and polices plan. Stage 2, 2a, 3 and stage 4 consultations. All boundary issues relating to sites allocations, land designations including green infrastructure, biodiversity issues and other policies with in the Sites and Policies Plan. This co-operation has assisted, influence, informed the Merton’s submission Sites and Policies; and Policies Map.</td>
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<tr>
<td>Royal Borough of Kingston upon- Thames</td>
<td>The council has actively engaged and co-operated with the Royal Borough of Kingston upon Thames by way of dialogue, meetings (sub regional and pan London meetings) and public engagement from the conception, of the plan up to submission of the sites and polices plan. Stage 2, 2a, 3 and stage 4 consultations. All boundary issues relating to sites allocations, land designations including green infrastructure, biodiversity issues and other policies with in the Sites and Policies Plan. This co-operation has assisted, influence, informed the Merton’s submission Sites and Polices; and Policies Map.</td>
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<tr>
<td>Primary Care Trusts/ NHS/ Director of Public Health</td>
<td>The council has actively engaged and co-operated with the health bodies and those who represent health and well being in the borough by way of dialogue, meetings (adjoining health areas and sub regional) and public engagement from the conception, of the plan up to submission of the sites and polices plan. Stage 2, 2a, 3 and stage 4 consultations. All issues relating health care provision in the borough either directly or indirectly: site allocations uses including community and health uses, land designations and policies with in the Sites and Policies Plan.</td>
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### Table: Duty to Co-operate Statement

<table>
<thead>
<tr>
<th>Entity</th>
<th>Description</th>
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<tr>
<td>Highways Authority</td>
<td>The council has actively engaged and seek to co-operate with the Highways authority by way of dialogue, and public engagement from the conception, of the plan up to submission of the sites and polices plan. Stage 2, 2a, 3 and stage 4 consultations</td>
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<tr>
<td>London Council (including groups/forums under London Council’s)</td>
<td>The council has actively engaged and co-operated with London Council’s and forums/groups of the London Councils by way of dialogue, meetings (sub regional and pan London) and public engagement from the conception, of the plan up to submission of the sites and polices plan. Stage 2, 2a, 3 and stage 4 consultations. All issues relating health care provision in the borough either directly or indirectly: site allocations uses including community and health uses, land designations and policies with in the Sites and Policies Plan. This co-operation has assisted, influence, informed the Merton’s submission Sites and Polices; and Policies Map</td>
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Appendix C: Maps and illustration of Merton Duty to Co-operate
Figure: Location of Industrial Areas with Sites Suitable for Waste Management Facilities as set out in Policy WP4, Schedule 2

Legend:
- Industrial Area

See Schedule 2 for site information.