

SHAPING THE BOROUGH

WALTHAM FOREST LOCAL PLAN (LP1) 2020 - 2035 SUBMISSION

**DUTY TO
COOPERATE**



APRIL 2021



London Borough of Waltham Forest
“Shaping the Borough” Local Plan LP1
DUTY TO COOPERATE STATEMENT

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1.0 Introduction

1.1 The London Borough of Waltham Forest has prepared this Duty to Cooperate Statement to highlight the level of engagement undertaken during the preparation of its emerging Local Plan “Shaping the Borough” - LP1. Engagement with neighbouring boroughs has taken place since the Direction of Travel Stage. The majority of organisations that we engaged with when drafting this Local Plan had no strong views on our emerging strategy. However, there are key cross-boundary strategic issues arising from the Local Plan surrounding the mitigation of our growth strategy which has led to the necessitation of further cooperation with some neighbouring boroughs / districts and external organisations to produce mitigation strategies for the Plan Period. In order to allow these strategies to be realised, the Council is in position of continual dialogue with these organisations in order to produce the strategies to address these key issues.

This document is supported by a Statement of Common Ground (SCG), which is currently being prepared. The Council notes the purpose of the SCG as a document that sets out the cross-boundary matters being addressed, and documenting progress made in cooperating to address them. As this is a live document constantly being updated on an ongoing basis, a position statement has been included in this statement for now. The Council intends to publish the SCG document separately.

1.2 The importance of cross-boundary planning

1.2.1 The Council recognises that planning across boundaries is an important aspect of the plan-making process. This relates to the management of development and infrastructure impacts that are likely to affect more than one local authority area. The Council is committed to the Duty to Co-operate and working effectively with neighbouring authorities and other bodies to make sure that it has dealt with issues that do not stop at administrative boundaries.

1.2.2 The Duty to Co-operate (hereafter: the Duty) is embedded in the Localism Act 2011 and relates to sustainable development or use of land that would have a significant impact on at least two local planning areas, otherwise described as strategic matters and requires:

- Councils and public bodies to 'engage constructively, actively and on an on-going basis' to develop strategic policies;
- Councils to set out planning policies to address such issues; and
- Councils to consider joint approaches to plan making.

1.2.3 All local planning authorities are expected to demonstrate evidence of having successfully co-operated to plan for issues with cross-boundary impacts when their local plans

are submitted for examination. However, The Duty is not a 'duty to agree'. The key requirement is therefore to demonstrate clear 'outcomes' emerging from the 'process' of cooperation that has taken place.

1.2.4 The Council is required to demonstrate evidence of having effectively co-operated with Duty-bodies to plan for issues with cross-boundary impacts throughout the preparation of the Local Plan.

1.2.5 This statement accords with the Duty to Co-operate Statement Template published by the Planning Advisory Service (PAS) in August 2011

1.3 Legal Context

1.3.1 The Localism Act 2011 makes strategic planning the responsibility of local authorities, which are expected to address strategic issues in Local Plans and demonstrate how this has been managed through the 'Duty to Co-operate'. The 'Duty' is set out in Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended by Section 110 of the Localism Act).

1.3.2 As well as applying to all local planning authorities and county councils in England, the Duty also applies to a number of other 'prescribed' bodies, that Local Authorities should co-operate with in preparing Local Plans. Regulation 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012 sets out who those 'prescribed' bodies are. These are set out below:

- The Environment Agency;
- The Historic Buildings and Monuments Commission for England (known as English Heritage);
- Natural England;
- The Mayor of London;
- The Homes and Communities Agency;
- Clinical Commissioning Groups;
- National Health Service Commissioning Board;
- The Office of Rail Regulation;
- Transport for London;
- Each Integrated Transport Authority;
- Each highway authority; and the Marine Management Organisation.

1.4 Policy Context

1.4.1 The requirements for the Duty are set out in paragraphs 178-181 of the National Planning Policy Framework, and in the Planning Practice Guidance (PPG). The Duty particularly relates to the strategic priorities identified in paragraph 156 of the NPPF.

1.4.2 Two tests of soundness identified in the NPPF (paragraph 182) relate directly to the Duty, as follows:

1. **Positively Prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is practical to do so consistently with the presumption in favour of sustainable development; and
2. **Effective** – the plan should be deliverable over its period and based on effective joint-working on cross-boundary strategic priorities.

1.5 Structure of the Duty-to-Cooperate Statement

1.5.1 The Duty to Co-operate statement is structured in the following way:

- Section 2 provides an overview of the engagement stages throughout the preparation of the Local Plan
- Section 3 sets out the strategic planning context for Waltham Forest within London and the sub-region
- Section 4 provides an overview of the strategic planning issues for Waltham Forest and how strategic working has influenced the Local Plan.

1.5.2 The statement is supported by Annex A: 'Key relationships and bodies' which details the engagement with individual statutory organisations and local authorities and Annex B: 'Audit trail' which provides an audit trail of key milestones for each strategic issue covered in Section 4.

2.0 Summary of Local Plan Engagement Stages

2.0.1 The Local Plan has been prepared in accordance with the stages identified in The Town and Country Planning (Local Planning) (England) Regulations 2012. Engagement with relevant stakeholders has taken place throughout the preparation of the Local Plan. The table below summarises the key interactions that the Council has initiated to fulfil the Duty to Co-operate for the Local Plan.

| Date | Event | Target | Outcome |
|--|---|----------------------------|---|
| March 2017 (subsequently reviewed December 2018) | Local Development Scheme (LDS) Approved by Cabinet and Full Council | Waltham Forest Councillors | The LDS set out the subject matter and geographical area of the documents the Council intended to prepare. It has played an important role in informing the public, stakeholders and local communities about the plan preparation programme and when to get involved. It also established the Council's priorities regarding plan making, |

| | | | |
|-------------------------|---|------------------|---|
| | | | enabling the work programme to be set. |
| 06/11/2017 - 22/12/2017 | Direction of Travel Consultation (Early reg 18) | All Stakeholders | Document published explaining what the Local Plan is and setting out the strategic direction for development - the needs, challenges and opportunities facing the Borough over the next 15 years. It set out proposed policy directions for comment, and explained how the plan making process would proceed and how to get involved. |
| 2018- Summer 2019 | Engagement and production of Draft Local Plan | All Stakeholders | During this period, work on the production of the Draft Local Plan took place, shaped by responses to the Direction of Travel document, as well as ongoing changes to national and London policy, changing economic and demographic predictions. Meetings were held with neighbouring boroughs and statutory consultees under the Duty to Cooperate. |
| 22/07/2019- 30/09/2019 | Consultation on the Draft Local Plan (Regulation 18 Consultation) | All Stakeholders | Waltham Forest Council Cabinet approved the Draft Local Plan for publication and consultation and delegated authority to make final changes to the draft plan ahead of consultation, to the Director of Planning in consultation with the Portfolio Lead for Economic Growth and Housing Development. All residents, businesses and stakeholders were invited to submit responses to the formal consultation by the following means: online, email, post. In total, 401 submissions were made to the 2019 Reg 18 consultation (342 from individuals and 59 from |

| | | | |
|---------------------------------|---|-------------------------------|--|
| | | | organisations) involving 2,655 comments. |
| September 2019 – September 2020 | Amendments to the Regulation 18 Draft Local Plan | All Stakeholders | <p>The Council made changes to the Draft Local Plan to address comments received during consultation.</p> <p>In particular, one major change was undertaken at this stage: in response to requests from residents made during the public consultation, a supplementary part was added to the Local Plan document – the draft Site Allocations, identifying key sites on which the proposed growth could be accommodated.</p> |
| June 2020 | Consultation Report Published | All Stakeholders | This 700-page Consultation Report document collated the 2,000+ responses received during the Reg 18 consultation on the Draft Local Plan and issues offer responses to each. This was published online for public view. |
| 24/09/2020-1412/2020 | Regulation 18 Draft Site Allocations Document (LP2) | All Stakeholders | Site Allocations was published 24 September and underwent 11-week Reg 18 Consultation to 14 December 2020. |
| 26/10/2020 | Regulation 19 Pre-Submission Local Plan Consultation (LP1) | All Stakeholders | Strategic Policies Proposed Submission Version was passed by Cabinet on 08/10/2020 and published 26/10/2020. The Plan underwent a seven-week statutory Reg 19 consultation from 26 October to 14 December 2020, centred on the four tests of soundness. |
| April 2021 | Local Plan LP1 Submission to PINS (Planning Inspectorate, Secretary of State) | LBWF Planning Policy Officers | The Council's Local Plan (LP1) will be submitted for examination with a list of Proposed Changes to the published plan. At this stage consultation has not been |

| | | | |
|--|--|--|---|
| | | | undertaken on these changes. The Council understands that the Inspector will not treat such changes as part of the Plan to be examined but these could be taken forward as Main Modifications to the Plan (to be consulted on separately) subject to the Inspector's recommendations. |
|--|--|--|---|

2.0.2 Engagement with individual bodies has taken place on an ongoing and regular basis. Other local authorities in the sub-region are also progressing Local Plans. Engagement has therefore also occurred through initiatives arranged by other local authorities. Annex A: 'Key relationships and bodies' sets out how the Council has engaged with individual bodies; this also provides more detail on the workshops and partnerships relevant for the Local Plan.

3.0 Strategic Planning Context for Waltham Forest

London Plan Context

3.0.1 The Mayor's London Plan sets the strategic policy context for Waltham Forest. It is the overall strategic plan for London, covering a range of issues of strategic importance for the Greater London area. The Local Plan is required to be in general conformity with the London Plan, which is also part of the development plan for the borough.

3.0.2 The first London Plan was published in 2004. Another iteration of the London Plan was published in 2011, with a consolidated version including alterations published in March 2016. The Mayor of London has a new 2021 London Plan which was adopted by in March 2021

3.0.3 The London Plan sets out the strategic context for growth and development as well as the key areas for growth and also covers a range of more detailed issues. Strategic issues covered in the London Plan that the Local Plan cannot change are included in Annex C: 'London Plan context'.

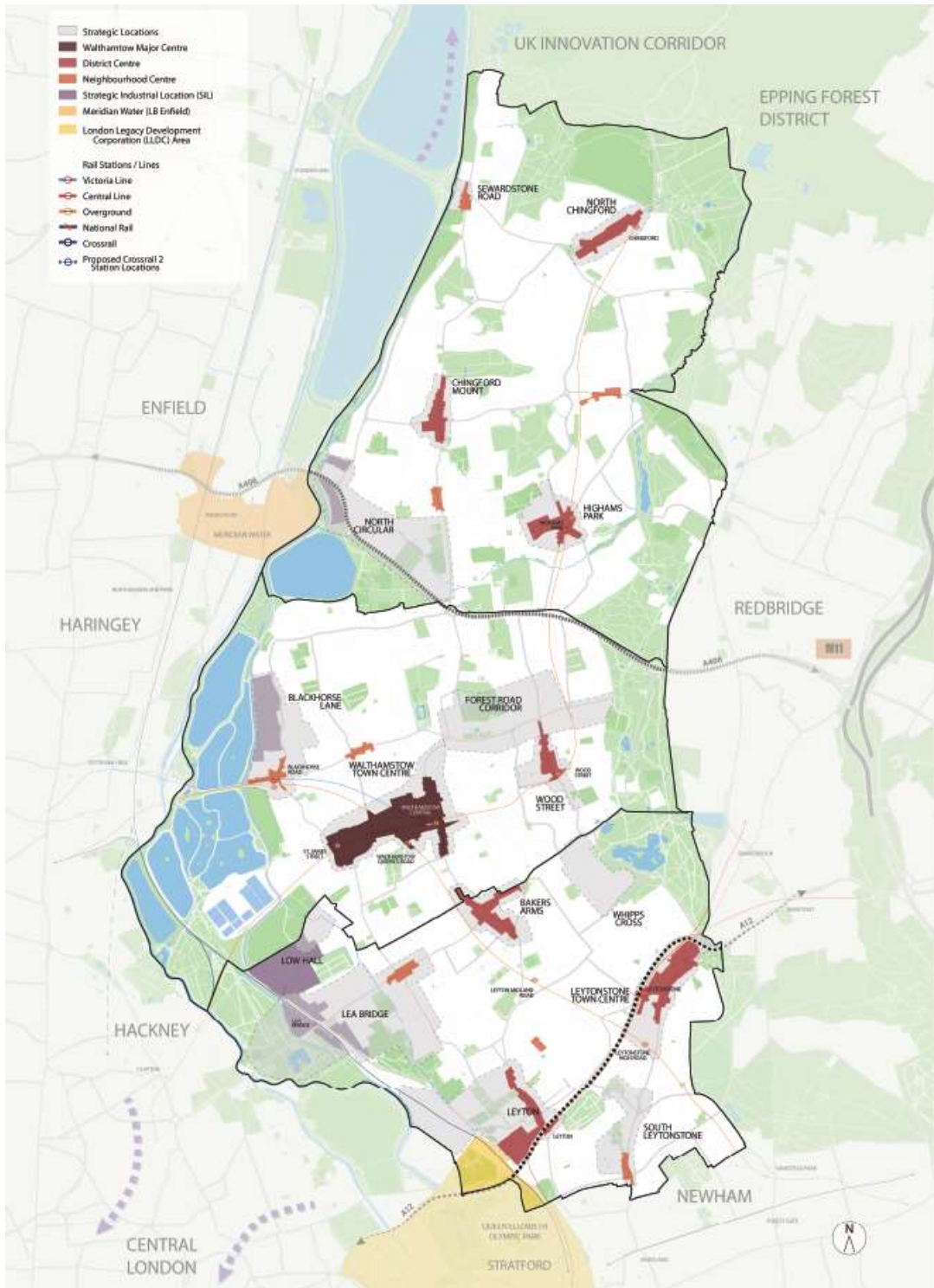
3.1 Waltham Forest: Strategic Geography

3.1.1 Waltham Forest is an outer borough situated in North East London. It is relatively small (3,880 ha), but very diverse borough stretching from the Queen Elizabeth Olympic Park in the South to the Epping Forest SAC & SSSI and the County of Essex in the North. The borough is bookended by the River Lea and its 13 associated reservoirs and marshes to the West and the Epping Forest to the East. Neighbouring London boroughs are Redbridge, Newham, Enfield, Hackney, and Haringey, while on its northern edge it also abuts Epping Forest District Council and the overarching Essex County Council.

3.1.2 Waltham Forest is a collection of neighbourhoods built up around busy high streets, stations and historic villages. These roughly align with the geographic areas of the borough identified in this Local Plan: South (Bakers Arms, Lea Bridge, Leyton, Leytonstone, Whipps Cross); Central (Blackhorse Lane, Forest Road Corridor, St James' Quarter, Walthamstow, Wood Street); and North (Chingford, Chingford Mount, Highams Park, North Circular Corridor, and Sewardstone Road). While South and Central areas of the borough have a dense urban character and busy street life, the borough becomes more suburban to the North with lower density housing and more open green spaces that flow into the Green Belt, Epping Forest and out into rural Essex.

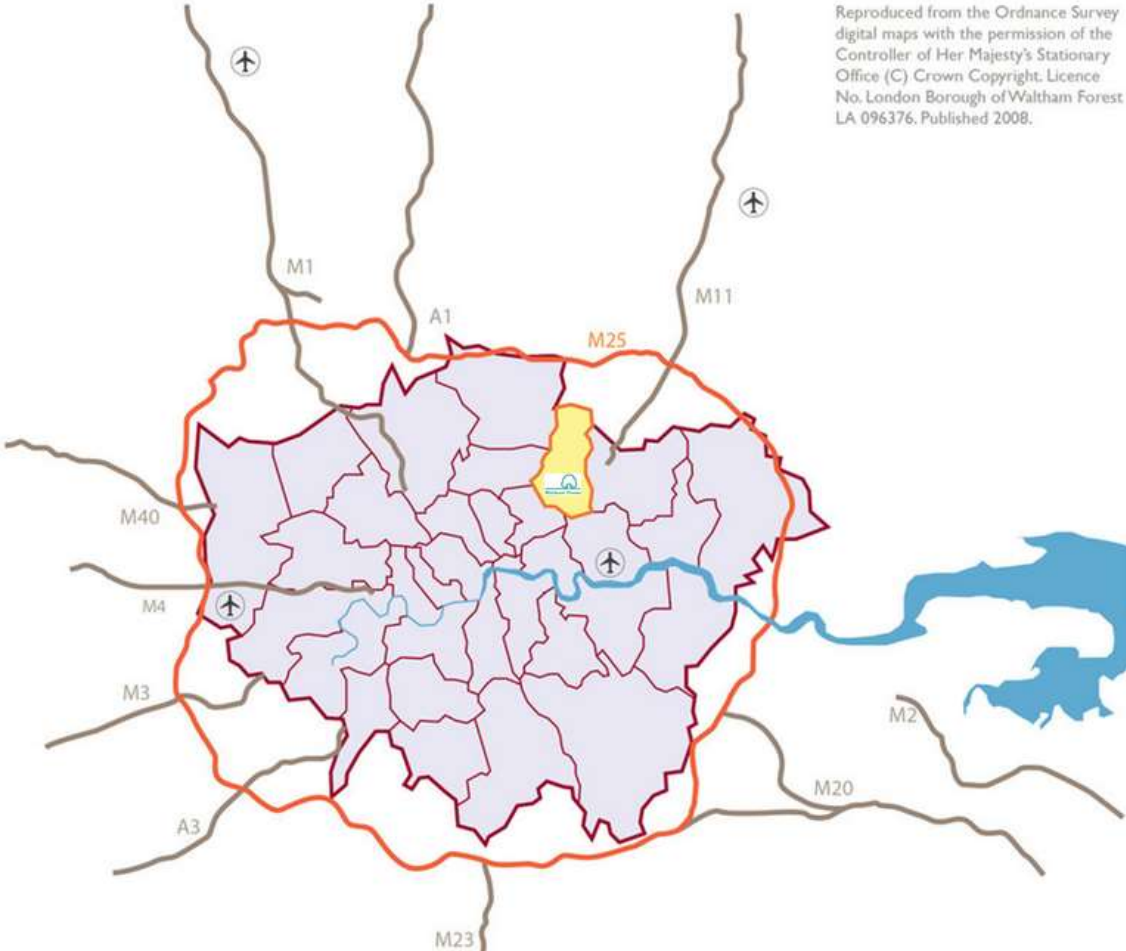
3.1.3 The South and Centre of the borough are connected to Central London by the Victoria and Central Lines. Two overground rail lines serve the north east of the borough: the Liverpool Street to North Chingford line and newly electrified Gospel Oak and Barking line. The station at Lea Bridge was reopened in 2016 connecting to Stratford and improvements to other local stations are planned. The borough is intersected by several major road arteries, including the A406 North Circular, the A12, the A503 Forest Road and the A104 Lea Bridge Road. These provide good connectivity across London although create barriers between parts of the borough and contribute to localised air quality issues. A large swathe of the north west of the borough remains poorly served by public transport with low Public Transport Accessibility Level (PTAL) rating. In conjunction with the Local Plan, Waltham Forest Council will be working with TfL on improving links and capacity in order to support the existing and anticipated growth in population. The award-winning £30 million Enjoy Waltham Forest (Mini Holland) network of dedicated cycle lanes has improved connectivity between neighbourhood centres and reinforced the borough's commitment to reducing car use and promoting active travel.

3.1.4 The London Borough of Waltham Forest Map of Borough Boundary



3.1.5 The London Borough of Waltham Forest in the wider London Context

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3.1.6 The North London Waste Authority was established on 1 April 1986 as a joint arrangement under part II of the Local Government Act 1985. It replaced the Greater London Council in part of North London and became the Waste Disposal Authority for 7 North London boroughs consisting of:

1. London Borough of Waltham Forest
2. London Borough of Barnet
3. London Borough of Camden
4. London Borough of Enfield
5. London Borough of Hackney
6. London Borough of Haringey
7. London Borough of Islington

3.1.7 The establishment of joint committees for this purpose was voluntary. The boroughs could have become individual waste disposal authorities. Each was already, and continued to be, responsible for waste collection.

3.1.8 The North London Waste Plan (NLWP) will set out the planning framework for waste management in the North London Boroughs for the next 15 years. It will identify sites for waste management use and set out policies for determining waste planning applications.

3.1.9 An emerging North London Waste Plan (NLWP) is being examined by an independent Planning Inspector, Mr Stephen Normington BSc DipTP MRICS MRTPI FIQ FIHE, whose role is to assess whether the plan complies with the legal requirements and is sound. Following the NLWP hearing sessions in November 2019 the North London Boroughs consulted on Main Modifications to the NLWP October-December 2020. The consultation was limited in scope to issues of soundness or legal compliance of the Main Modifications and not about any other aspects of the plan. Consultation documents and representations are available on the Examination page.

4.0 Strategic Planning Issues for the London Borough of Waltham Forest

4.1 Introduction

4.1.1 This section sets out how the Council has engaged with other bodies to address the strategic planning issues for Waltham Forest. These have been identified early in the Local Plan process and updated to reflect on-going discussions with stakeholders. The strategic planning issues for Waltham Forest relate to:

- 1) Decent Homes for Everyone
- 2) Building a Resilient and Creative Economy
- 3) Promoting Culture and Creativity
- 4) Distinctive Town Centres and High Streets
- 3) Social and Community Infrastructure
- 4) Promoting Health and Well-being
- 5) Creating High Quality Places
- 6) Active Travel, Transport and Digital Infrastructure
- 7) Enhancing and Preserving Our Heritage
- 8) Protecting and Enhancing the Environment
- 9) Addressing the Climate Emergency
- 10) Promoting Sustainable Waste Management

Within Annex B: 'Audit trail' an overview is provided of the key meetings and decisions that impact on the above strategic issues. This provides more detail on how engagement has taken place and when decisions were taken.

4.2 Decent Homes for Everyone

Strategic Planning Issue

The NPPF requires local authorities to meet "the full, objectively assessed needs for market and affordable housing in the housing market area". The London Borough of Waltham Forest forms part of the London Wide Housing Market Area alongside all other London Boroughs. Waltham Forest shares a sub housing market area with the London Boroughs of Barking and Dagenham, Havering, Newham and Redbridge.

A Strategic Housing Market Assessment has been prepared to establish the Objectively Assessed Need for housing across the Area. The London Borough of Waltham Forest were not part of the commissioning group for this assessment but given the identified housing markets in the study area results for the borough have been included within this document.

The Council has worked with these authorities to identify the housing need in the sub housing market area. The Planning Policy for Traveller sites sets out that local authorities should plan positively for Gypsy and Traveller sites. The 2021 London Plan (Policy H14, Gypsy and Traveller Accommodation) contains direction on provision for Gypsy and Traveller accommodation. The London Borough of Waltham Forest updated its Gypsy and Traveller Accommodation Assessment in March 2020 and addressed the issues identified in the audits in the Regulation 19 version of the Local Plan Strategic Policies document LP1.

London Plan Context

The 2021 London Plan Policy H1 (Increasing Housing Supply) Sets 10 year targets for net housing completions that each local planning authority should plan for. The London Borough of Waltham Forest includes these targets in the Development Plan Document (Shaping the Borough – Waltham Forest Local Plan (LP1) 2020-2035)

Paragraph 4.1.1 of the 2021 London Plan states that "The Mayor has carried out a London-wide Strategic Housing Market Assessment (SHMA) and Strategic Housing Land Availability Assessment (SHLAA). The SHMA has identified need for 66,000 additional homes per year. The SHMA covers overall housing need as well as exploring specific requirements for purpose-built student accommodation and specialist older persons' accommodation within the overall figure." The London SHMA and SHLAA are pan London projects undertaken with full participation of all London Boroughs. Waltham Forest Council played its part in formulating the assumptions for this study and in reaching agreed outcomes.

As highlighted by Paragraph 4.1.12, A mitigation strategy for the Epping Forest Special Area of Conservation (SAC) is being produced to respond to the impact of additional recreational pressure and air pollution from nearby authorities, including some London boroughs. Should monitoring and evidence demonstrate adverse impacts on the SAC associated with development from London and following the implementation of the mitigation strategy, this will be considered as part of assessing whether a review of the London Plan is required. The GLA will engage with the relevant stakeholders on the formulation and delivery of the mitigation strategy.

The London Plan identifies Walthamstow as having “high residential growth potential” and Policy 10 of the LP1 document sets out strong growth aspirations for the ‘Central’ area of the Borough which includes aspirations for Walthamstow Town Centre (including Hoe Street) Strategic Location, Wood Street Strategic Location , Forest Road Corridor and Blackhorse Lane Strategic Location.

Evidence Base

1. Outer North East London Strategic Housing Market Assessment – May 2016.
2. Strategic Housing Market Assessment for London Borough of Waltham Forest February 2nd 2019.
3. The 2017 London Strategic Housing Market Assessment.
4. Gypsy and Traveller Accommodation Assessment – March 2020.

Strategic Partners

- The Mayor of London and the Greater London Authority (GLA)
- Transport for London (TfL)
- London Borough of Redbridge
- London Borough of Newham
- London Borough of Hackney
- London Borough of Enfield
- London Borough of Haringey
- Lee Valley Regional Park Authority
- Epping Forest District Council
- Essex County Council
- Natural England
- The City of London Conservators of Epping Forest
- London Legacy Development Corporation (LLDC)
- Highams Park Planning Group

Actions Taken

- Engaged and participated in the preparation of the SHMA with the commissioning boroughs on the jointly prepared the Outer North East London SHMA with the London Boroughs of Redbridge, Havering, Barking and Dagenham and Newham.
- Engaged with the Highams Park Planning Group to discuss how housing projections in the SHMA are translated to site typologies in the Highams Park Planning boundary and other sites of local interest to the group.
- Engaged with the GLA on the following areas of the topic of Housing including Design code and SPD with a focus on small sites, typologies, SHLAA, Brownfield Land Register, Growth Capacity Study, OAPF, Implications of the 5-year Land Supply, Gypsy and Traveller need and Low-Cost Rent

Outcome of Strategic Working

The London Boroughs of Barking and Dagenham, Havering, Newham and Redbridge jointly commissioned a Strategic Housing Market Assessment (SHMA) to establish the Objectively Assessed Need (OAN) for housing across the sub housing market area. This included Waltham Forest, which was not a commissioning borough but shared a housing market area with Newham. Neighbouring local authorities have been consulted throughout the preparation of the SHMA. The SHMA concluded that Waltham Forest falls within the Outer North East London housing market area, consisting of Barking and Dagenham, Havering, Newham and Redbridge. The SHMA update found that the OAN for Waltham Forest is above the London Plan housing target at 1,810 dwellings per annum over the period 2014-2039.

On Gypsy and Traveller needs, ORS (Consultants) were commissioned to undertake the Gypsy and Traveller Accommodation Assessment (GTAA) for Waltham Forest. Through regular meetings with neighbouring authorities, it was found that several other authorities were performing or updating their needs assessments, and were looking to meet their own need within their local authority boundary. ORS also engaged with neighbouring authorities, LGTU and the Showmen's Guild to identify cross boundary issues. The GTAA concluded that there were no cross-boundary issues affecting the provision for Gypsy and Travellers. The GTAA provides in more detail how engagement on this issue has taken place. The Council is looking to meet its own needs with regards to Gypsy and Traveller accommodation in the Local Plan and has communicated this with neighbouring authorities.

Ongoing Cooperation

The Council will continue to engage with the GLA, and other stakeholders to ensure the delivery of homes in the borough.

Ongoing engagement with the Highams Park Planning group which has led to the preparation and subsequent adoption of the Highams Park Neighbourhood Plan which shapes the development within the Highams Park Neighbourhood Boundary in late 2020.

4.3 Building a Resilient and Creative Economy

Strategic Planning Issue

The NPPF states that Local Plan policies should be prepared to support and encourage economic growth and create an environment in which businesses want to ‘invest, expand and adapt in’.

The London Plan identifies several Strategic Industrial Locations in the borough. The London Plan also identified strategic outer London development centres in the borough. The Council needs to work with partners to ensure sufficient employment land is allocated to meet local and sub-regional employment needs. Provision also needs to be made of the right type of workspace, and the creation of jobs and improvement of skills to strengthen local employment opportunities. Ensuring the growth of Havering's economy including its town centres whilst recognising the wider regional context and the economic role of central London is therefore a key strategic issue for the Local Plan.

Walthamstow and Leyton have been identified by the London Plan as opportunity areas in Policy SD1. These areas are described as being significant locations that have a larger developable capacity to accommodate new housing, commercial development and infrastructure (of all types), and strong links to existing or potential public transport connections. Opportunity Areas typically contain capacity for at least 5,000 net additional jobs or 2,500 net additional homes or a combination of the two.

The SHMA indicates that economic growth in key opportunities areas could be achieved by broadening employment opportunities around the Blackhorse Lane area in Walthamstow that contain clusters of creative industries which should be protected and supported.

The London Borough of Waltham Forest Piloted the Creative Enterprise Zone (CEZ) at Blackhorse Lane. Building on its manufacturing history, the area is centred around developments which provide flexible and creative spaces providing attractive and affordable office, commercial and studio options for start-up and incubator businesses. The Council is also very supportive of meanwhile uses.

Evidence Base

1. Waltham Forest Employment Land Study -2019
2. Growth Capacity Study - 2018

Strategic Partners

- The Mayor of London and the Greater London Authority (GLA)
- Transport for London (TfL)
- London Borough of Redbridge
- London Borough of Newham
- London Borough of Hackney
- London Borough of Enfield
- London Borough of Haringey
- Lee Valley Regional Park Authority
- Epping Forest District Council

Actions Taken

Continual Engagement with the GLA with the CEZ Pilot at the set up and delivery stage.

Engagement with internal colleagues in Regeneration and Inward Investment.

Engagement with staff at Gnome House / E17 Creative Works / Switchboard Studios / Yonder / Wild Card Brewery – Lockwood to gauge opinion on how being located in the CEZ is impacting their business.

Outcome of Strategic Working

Through strategic working primarily with the GLA, there has been very positive feedback from tenants that occupy the developments in the Blackhorse Lane CEZ. Their success has also inspired other creative workspaces outside of the CEZ to follow a similar formula in their own developments.

Ongoing Cooperation

The Council will continue to engage with the GLA on this strategic matter. The London Borough of Waltham Forest views the development of London's first CEZ at Blackhorse Lane as a pioneering development so such the council is willing to cooperate with any authority looking to allocate.

4.4 Promoting Culture and Creativity

Strategic Planning Issue

The London Borough of Waltham Forest is the first borough to be designated by the Mayor of London as a “Borough of Culture” - A title which was held for duration of 2019. The strategic policies the emerging Local Plan has presented an opportunity to preserve and build on the lasting legacy of the Borough of Culture.

A significant part of economic growth in the borough over the last few years has been apportionable from the ‘cultural economy’ sector where many related businesses have clustered together in hubs. This is typified predominately by the industries of IT, Audio Visual, Performing and Visual Arts, Design, Advertising and Marketing, Architecture, Publishing and Craft.

Through the emerging Local Plan, the council seeks to promote the boroughs presence in the creative economy sector to encourage endogenous economic growth. This will be achieved by protecting and enhancing our existing cultural assets and supporting new Cultural and Creative Industry ventures.

And as above; The London Borough of Waltham Forest Piloted the Creative Enterprise Zone (CEZ) at Blackhorse Lane. Building on its manufacturing history, the area is centered around developments which provide flexible and creative spaces providing attractive and affordable office, commercial and studio options for start-up and incubator businesses. The Council is also very supportive of meanwhile uses.

London Plan Context

The London Plan recognises Walthamstow as containing hubs of creative industries that should be supported and protected. The London Plan indicates that there should be provision of sufficient supply of business space of different types, uses and sizes will ensure that workspace is available for occupation by SMEs and businesses wishing to start-up or expand and that the rents for such spaces are appropriate for the businesses that chose to occupy them.

Evidence Base

1. Waltham Forest Cultural Infrastructure Study – June 2020
2. Waltham Forest Employment Land Study -2019
3. Growth Capacity Study - 2018

Strategic Partners

- The Mayor of London and the Greater London Authority (GLA)
- London Borough of Redbridge
- London Borough of Newham
- London Borough of Hackney
- London Borough of Enfield
- London Borough of Haringey
- Lee Valley Regional Park Authority

Actions Taken

Continual Engagement with the GLA with the CEZ Pilot at the set up and delivery stage.

Enabling and promoting facilities such as Gnome House / E17 Creative Works / Switchboard Studios / Yonder / Wild Card Brewery – Lockwood and engaging with tenants to gauge opinion on how being located in the CEZ is impacting their business.

Inclusion of policies in the emerging Local Plan that recognise the Cultural and Creative Sectors in the Borough's economy to promote and support economic growth in this sector.

Outcome of Strategic Working

Highly successful development in the designated CEZ and the location of many businesses from the cultural and creative sector to the borough have facilitated the Waltham Forest being designated as London's first Borough of Culture in 2019.

The successes from this are carried through as a golden thread in the emerging Local Plan so the continued legacy of the Borough of Culture and the need to provide businesses in this sector with the opportunity to thrive is a theme that runs deeply in the Local Plan.

Ongoing Cooperation

The Council will continue to cooperate with the GLA and work with neighbouring boroughs who as part of their strategic development framework, plan to adopt an approach that promotes growth through this sector in their emerging Local Plan frameworks.

4.5 Distinctive Town Centres and High Streets

Strategic Planning Issue

Paragraph 85 (a) of the NPPF states that Local Plans should: “define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters”.

Walthamstow Town Centre is the borough’s major Town Centre by the London Plan. Walthamstow Central Transport Interchange; one of the busiest transport interchanges in North London is located in the Walthamstow Town Centre and this along with “The Mall” shopping arcade, plays an important function for the sub-region. The Council has to work with partners to make sure that Walthamstow Town Centre continues to be the boroughs this major retail location.

There are also seven district centres in the borough located at;

- Bakers Arms
- Leyton
- Leytonstone
- North Chingford
- South Chingford
- Highams Park
- Wood Street

In addition, there are 8 neighbourhood centres and 18 local parades to meet local resident's needs. The policies in the local plan seek to revitalise these designated centres and parades so they maintain their vibrancy and vitality in an increasingly challenging retail climate.

It has been acknowledged that changes in consumer habits have been accelerated by the advent of the Covid-19 pandemic. This has led to greater home-working which has increased the reliance of local Town Centres and has presented an opportunity for them to be re-imagined so they are better aligned to meet their future demand. The Council has produced a document entitled the ‘Waltham Forest High Street Action Plan’ which sets out how the Council are going to support businesses in the identified town centres to recover, reopen and reimagine.

It is of strategic importance that the Borough’s centres and the businesses that are located there are promoted to deliver the aspirations of the 15-minute neighbourhood.

London Plan Context

The London Plan describes how retailing has evolved in recent years, with new innovative forms of retailing challenging conditions for the traditional high street shop. The trends observed have been exacerbated by the Covid-19 pandemic and more people adopting a ‘working from home’ regime. Town Centres need to be flexible enough to adapt to these changes by accommodating new space where there is identified demand and managing the transition of surplus retail floorspace to other uses where necessary.

The Mayor’s London Plan promotes regular town centre health checks in line with national policy and guidance to assess the overall health, vitality and viability of London’s town centres

and high streets. The London Town Centre Health Check (TCHC) is an ongoing series of strategic London-wide health checks undertaken by the GLA with support from the London boroughs. It provides data on the health of over 200 of London's town centres across a selection of strategic indicators including the diversity of uses, demographics and footfall, development trends, economic performance, transport and connectivity, environmental quality, safety and wellbeing and illustrates how these variables have changed over time. Over the years the Council has actively participated in this project.

Evidence Base

4. Waltham Forest Employment Land Study -2019
5. Growth Capacity Study - 2018

Strategic Partners

Discussions with the GLA and individual boroughs

Actions Taken

The publication of the Waltham Forest High Street Action Plan - To support the recovery of the High Street post pandemic.

Outcome of Strategic Working

The publication of the Waltham Forest High Street Action Plan.
Support grants for businesses affected by the Covid-19 Pandemic.

Ongoing Cooperation

We will continue to cooperate with the GLA and engage with local businesses to understand and support their specific needs.

4.6 Social and Community Infrastructure

Strategic Planning Issue

There needs to be a provision of appropriate facilities and services to support the projected levels of growth over the plan period and meet the needs of the changing population. The Council has worked with a range of infrastructure providers across to ensure there is adequate infrastructure provision within the borough and where necessary the sub-region.

Part of ensuring adequate transport infrastructure is the delivery of transport infrastructure to support growth and improve connectivity.

London Plan Context

In the recently adopted 2021 London Plan – Social and Community Infrastructure have become a thread that has run through each of the thematic areas of The Plan.

Evidence Base

- Infrastructure Delivery Plan 2021
- Playing Pitch Strategy 2020
- Sport England: Facility Planning Model: Sports Halls
- Sport England: Facility Planning Model: Swimming Pools

Strategic Partners

- Greater London Authority (GLA)
- Transport for London (TfL)
- Sport England
- London Healthy Urban Development Unit (HUDU)
- Barts Health NHS Trust & Clinical Commissioning Group (CCG)
- Waltham Forest Clinical Commissioning Group (WFCCG)
- London Borough of Redbridge
- London Borough of Newham
- London Borough of Hackney
- London Borough of Enfield
- London Borough of Haringey
- Lee Valley Regional Park Authority

Actions Taken

- Engagement with a range of infrastructure providers from both public and private sectors through the preparation of the Infrastructure Delivery Plan (IDP).
- Engagement with Waltham Forest Clinical Commissioning Group, HUDU and the Council's Public Health department on health provision in the borough.
- Engagement with neighbouring authorities to discuss how cross boundary growth can be accommodated on the transport network.
- Engagement with TfL on Strategic Transport Aspirations and other transport infrastructure requirements (table 4.4)
- Discussions with the Waltham Forest Education Department on school planning.
- Discussions with neighbouring boroughs on education provision.

Outcome of Strategic Working

The Council has prepared a new comprehensive IDP has been prepared with the co-operation of service providers across a range of sectors to accompany the Local Plan. This has resulted in an up-to-date overview of infrastructure needed to support the growing and changing population over the plan period covering the following thematic areas:

- Transport
- Digital Communications
- Energy
- Water Supply & Sewage
- Sustainable Waste Collection & Management
- Emergency Services (inc. Fire, Ambulance, Police & Borough CCTV)

Social & Community Infrastructure

- Health
- Education Childcare/Early Years Facilities
- Culture & The Creative Economy
- Built & Natural Heritage
- Sports & Leisure
- Outdoor Play
- Libraries
- Gypsy & Traveller Provision
- Burial Space Capacity

Green & Blue Infrastructure

- Open Space
- Allotments
- Trees & Biodiversity
- Air Quality
- Blue Infrastructure & Strategic Flood Risk
- Green & Blue Strategic Projects to 2035
- Epping Forest

The London Borough of Waltham Forest has engaged with the Barts CCG, Neighbouring Authorities and the GLA regarding the provision and reprovision of infrastructure for the redevelopment of the Whipps Cross Hospital which has been reflected in the IDP.

The Council has worked closely with the Health Department at the Council, Waltham Forest Clinical Commissioning Group (WFCCG) and the NHS Commissioning Board to provide a clear view of the needs for health facilities over the plan period. With the use of the HUDU model, the requirements for health facilities in the borough have been identified, on a strategic scale. The identified needs have been identified in the IDP and reflect the policy position in the Local Plan.

The London Borough of Waltham Forest is the Local Education Authority and as such has a statutory duty to ensure that there are sufficient school places for all children of statutory school age living in the borough.

Ongoing Cooperation

The Council will continue to engage with the CCG and NHS to review the need for health facilities and set up a mechanism for delivery. There will be continued engagement with colleagues in the council's Education and Schools Department. Possible sites for health and school facilities will be identified in the Site Allocations Document (LP2). The IDP is a live document and as such will be under regular review, for which engagement with providers and stakeholders will take place on a regular basis.

4.7 Promoting Health and Wellbeing

Strategic Planning Issue

Paragraph 91 of the NPPF states that the Local Plans should facilitate enable healthy lifestyles, especially where this would address identified local health and wellbeing needs. The key challenges facing Waltham Forest in the Local Plan period is tackling deprivation; Waltham Forest is currently ranked as being the 7th most deprived borough in London. The other key challenge is tackling childhood obesity with 22% of children in their reception year of school being overweight or obese rising to 39% of children being overweight or obese when reaching year 6.

The council has identified that the encouragement of the delivery of high-quality environments facilitates and enables healthier active and more sustainable lifestyles, the promotion of which is key to addressing health problems caused by obesity.

Key to the delivering healthier, active, and more sustainable lifestyles are the Council's introduction the 15 -minute neighbourhood concept, which broadly means that all residents needs are met within a 15-minute walk or cycle ride from their home.

London Plan Context

The London Plan identifies that the environment in which its inhabitants live is a determining factor of their health and that many of these factors can be shaped by local authorities through the planning system. The Mayors Health Inequalities strategy has identified the great scale of health inequalities in the capital and the need to reduce them to enable all Londoners to lead a long and healthy life.

Evidence Base

- Obesity and the environment, Density of fast-food outlets 2017
- Public Health England's Local Authority Health Profiles 2018
- Childhood obesity: a plan for action, chapter 2 2018

Strategic Partners

- Greater London Authority (GLA)
- Transport for London (TfL)
- Sport England
- London Healthy Urban Development Unit (HUDU)

- London Borough of Redbridge
- London Borough of Newham
- London Borough of Hackney
- London Borough of Enfield
- London Borough of Haringey

Actions Taken

- Pioneering the establishment of 15 Minute Neighbourhoods within the borough to ensure that all residents can fulfil their needs within 15 minutes of their front door.
- Promoting active and sustainable lifestyles that encourage walking and cycling for local journeys, public transport for longer journeys and reduced dependency on private motor vehicles.
- Introduction of Low traffic neighbourhoods / enjoy Waltham Forest (Mini-Holland)
- Anti-Idling at traffic hotspots.
- School Streets – to encourage less car journeys to schools.
- Included a Hot Food Takeaway Policy to discourage takeaways being located close to school premises.
- Encouragement to operate in compliance with the Council's Healthier Catering Commitment.

Outcome of Strategic Working

- Other authorities have the desire to include the 15-minute neighbourhood strategies in their own development plans.
- Neighbouring Authorities wish to connect into our burgeoning walking, cycling and public transport network.
- ONS Statistics are starting to indicate an uptake in active travel as the number of privately owned vehicles registered in the borough has recently declined as a result of a combination of the above measures and the delivery of Car-Free Development, a concept that provides limited parking for disabled residents and visitors whilst other residents are more reliant on active travel.

Ongoing Cooperation

- The Council is committed to ongoing dialogue and engagement with the GLA and TfL
- As a leading authority in this field, there is a strong desire to connect our active travel networks with those established and emerging in neighbouring boroughs across the North East London area.
- The Council is happy to engage with other authorities that are looking to adopt this approach.

4.8 Creating High Quality Places

Strategic Planning Issue

The London Borough of Waltham Forest has been set its highest housing targets. To align with the Strategic Housing Land Availability Assessment (SHLAA) and the Waltham Forest Growth Capacity study the local plan has identified a stepped housing requirement that delivers an average of 1732 dwellings per annum.

This housing requirement coupled with the sites that are likely to come forward in the Plan Period present constraints which have to be effectively mitigated through delivering a built environment that is of exemplary design that where possible follows a masterplan led approach.

Proposals for new development in the borough must therefore capture local distinctiveness and reinforce and enhance local character as well as being designed in a way to meet requirements on space and accessibility standards.

Due to the quantum of housing that is projected through the plan period it will be necessary on some sites to deliver taller and tall buildings. Due to their impact on the surrounding neighbourhood it is critical that a design led approach is adopted to capture, preserve and enhance the existing characteristics of the neighbourhood.

London Plan Context

The London Plan requires that development takes a design-led approach that responds to the special characteristics of the area for which it is planned.

Local plans must follow the measures that ensure that development that comes forward high quality and enhance, activate and appropriately frame the public realm. Their massing, scale and layout should help make public spaces coherent and should complement the existing streetscape and surrounding area.

In addition to this, buildings must be designed to perform well against standard performance criteria, maximise the opportunity for urban greening, support active travel (15-minute neighbourhood concept), feel safe for both residents and visitors alike and be inclusive.

Evidence Base

- Waltham Forest Character and Intensification Study 2019
- Conservation Area Appraisals and Management Plans
- Waltham Forest Draft Skyline Study 2020

Strategic Partners

- The Greater London Authority (GLA)
- The Metropolitan Police Force
- London Borough of Redbridge
- London Borough of Newham
- London Borough of Hackney
- London Borough of Enfield
- London Borough of Haringey
- The Highams Park Planning Group

Actions Taken

Ongoing discussions with the GLA and neighbouring boroughs and the Highams Park Neighbourhood Planning Groups.

Outcome of Strategic Working

Identifying the need to produce the Site Allocations Document (LP2) to give an indicative structure of where the growth in the borough during the plan period would be delivered and the production of the Waltham Forest “Draft Skyline Study” to illustrate what that growth applied to the sites might look like to inform the masterplanning process.

Ongoing Cooperation

The Council will continue to engage with the GLA and neighbouring boroughs and residents on this issue, which will be kept under constant review.

4.9 Active Travel, Transport and Digital Infrastructure

Strategic Planning Issue

The level of development proposed in the Local Plan over the next 15 years will have an unprecedented impact on the borough's Transport Network. The Council is supportive of measures that improve and enhance the current transport provision in the borough and assist the council in delivering the 15min Neighbourhood through the promotion of active and sustainable travel modes such as walking and cycling and building on the success of the 'Enjoy Waltham Forest' programme and the creation of low traffic neighbourhoods (Mini-Holland Scheme).

London Plan Context

In paragraph 10.1.1, the new London Plan states that in order to help facilitate this, an integrated strategic approach to transport is needed, with an ambitious aim to reduce Londoners' dependency on cars in favour of increased walking, cycling and public transport use.

Evidence Base

- Waltham Forest Strategic Transport Review 2020
- The Mayors Transport Strategy 2018
- Strategic Transport Modelling Report (TfL, Dec 2017)
- Residential Car Parking (TfL, Dec 2017)
- Cycle Parking (TfL, Dec 2017)
- Travel in London Report 10 (TfL, 2017)

Strategic Partners

- The Greater London Authority (GLA)
- Transport for London (TfL)
- City of London (Conservators of Epping Forest)
- London Borough of Redbridge
- London Borough of Newham
- London Borough of Hackney
- London Borough of Enfield
- London Borough of Haringey

- Lee Valley Regional Park Authority
- Epping Forest District Council

Actions Taken

- Delivery of the Transport Review and Transport Topic Paper to accompany LP1.
- Enhancements to the Active Travel Chapter in the Local Plan.
- Open Dialogue with neighbouring boroughs regarding cross-boundary connectivity of sustainable and active travel networks

Outcome of Strategic Working

The Transport Review commissioned in 2020 by the Planning Policy team, brings together a desktop review of studies, strategies and programmes that have been produced and undertaken to date by the Borough, to understand how the existing transport network operates, and begin to identify current constraints, gaps and opportunities for future work.

Delivery of the Transport Topic Paper has been prepared to support the Local Plan. This considers the context for transport in the borough regarding the growth projected in the Local Plan Period. It reflects on the conditions pre and 19 conditions and seeks to provide some interpretation of the potential future changes to these in the Covid-19 era.

Ongoing Cooperation

- The Council is committed to ongoing dialogue and engagement with the GLA and TfL
- As a leading authority in this field, there is a strong desire to connect our active travel networks with those established and emerging in neighbouring boroughs and authorities.
- The Council is happy to engage with other authorities that are looking to adopt this approach.

4.10 Enhancing and Preserving our Heritage

Strategic Planning Issue

As identified at the Regulation 18 Stage of preparation for LP1 our representation from Historic England indicated that our Archaeological Priority Areas had not been updated for approximately 30 years. In this time boundaries have changed and the methodology surrounding the designation of these areas has evolved.

London Plan Context

The London Plan requires Local Plans identify and sensitively manage of London's heritage assets. Another requirement is Up-to date Archaeological Priority Areas (APAs) that are classified using a tier system recognising their different degrees of archaeological significance and potential as presently understood.

Evidence Base

- Waltham Forest Archaeological Priority Area Appraisal October 2020
- Browning Road Conservation Area Appraisals and Management Plans
- Chingford Green Conservation Area Appraisals and Management Plans
- Forest School Conservation Area Appraisals and Management Plans
- Leucha Road Conservation Area Appraisals and Management Plans
- Orford Road Conservation Area Appraisals and Management Plans
- Ropers Field Conservation Area Appraisals and Management Plans
- Thornhill Road Conservation Area Appraisals and Management Plans
- Walthamstow Village Conservation Area Appraisals and Management Plans

Strategic Partners

- Historic England
- Place Services
- Essex County Council

Actions Taken

Collaborated with Historic England and Place Services to deliver a new Archaeological Priority Area Appraisal.

Outcome of Strategic Working

A new Archaeological Priority Area Appraisal was finalised in 2020 as part of a long-term commitment by Historic England to review and update London's Archaeological Priority Areas.

Ongoing Cooperation

There is ongoing cooperation with Place Services and Historic England who are due to brief borough planning officers on the topic of Archaeological Priority Areas on how the new appraisal will affect planning decisions in the borough.

4.11 Protecting and Enhancing the Environment

Strategic Planning Issue

The mitigation of adverse effects caused by growth of boroughs and districts that fall within the 6.2km Zone of Influence (ZOI) of The Epping Forest SAC SSSI has been identified as the key major challenge to address in the preparation of the London Borough of Waltham Forest's emerging Local Plan (LP1) Development Framework Document.

The Forest is currently listed as being in an "unfavourable" condition and suffering from in-combination effects of caused predominately by air pollution and recreational impacts caused by increased visitor numbers. This air quality issue has led to the deterioration and dieback of flora and therefore reduction in biodiversity and habitat for organisms and microorganisms that inhabit the forest. Increased visitor numbers has caused erosion to the footpaths and soil compaction in honey pot areas both inside and outside of the borough.

How these negative effects are mitigated in Local Plans for boroughs and districts in the 6.2km Zone of Influence of Epping Forest are a key consideration in the Local Plan consultation representation of Natural England – a major statutory consultee who is responsible for ensuring that England's natural environment, including its land, flora and fauna, freshwater and marine environments, geology and soils, are protected and improved. The City of London (Conservators of Epping Forest) are the Land Agents for the Epping Forest and manage it at an operational level.

London Plan Context

Para 2.1.33 of the New London Plan indicates that Planning frameworks should include an assessment of any effects on the Epping Forest Special Area of Conservation and appropriate mitigation strategies.

Evidence Base

- Waltham Forest Habitats and Regulations Assessment (HRA) 2020
- Waltham Forest Focussed Green Belt and Metropolitan Open Land Assessment 2019
- Waltham Forest Open Space Needs Assessment 2019
- London Environment Strategy May 2018

Strategic Partners

- Natural England
- City of London Conservators of Epping Forest
- Greater London Authority (GLA)
- Essex County Council
- Epping Forest District Council
- London Borough of Redbridge
- London Borough of Newham
- London Borough of Hackney
- London Borough of Enfield
- London Borough of Haringey

Actions Taken

As a result of representations on the regulation 18 version of LP1 the Local Plan – The Council modified the Plan to separate the Epping Forest SAC and SSSI from the Lee Valley Regional Park SPA RAMSAR to give it its own standalone policy within the protecting and enhancing the environmental chapter.

With consultants the in-combination effects in relation to the Epping Forest SAC and the growth projected in the London Borough of Waltham Forest were modelled for the Local Plan Period as set out in LP1 as part of the Habitats and Regulations Assessment required for the examination.

Outcome of Strategic Working

The outcome of our collaboration with our consultants has identified the need to produce an air quality study to understand the impact of air pollution on Epping Forest towards the end and after this plan period.

Working with in Cooperation with Epping Forest District Council, Neighbouring boroughs and City of London (Conservators of Epping Forest) the Council is currently working on a balanced Strategic Access Management and Monitoring Strategies (SAMMS) and Suitable Alternative Natural Greenspace s (SANG's) package which will assist in mitigating the negative in-combination effects of the growth projected in the Local Plan.

Ongoing Cooperation

The London Borough of Waltham Forest has formed an effective and productive working relationship with both Natural England and the City of London Conservators of Epping Forest that are working towards the implementation of an innovative solution for mitigating the negative effects currently being experienced in the Epping Forest and protecting it for future generations of residents to enjoy.

4.12 Addressing the Climate Emergency

Strategic Planning Issue

Along with many other Local Authorities, the London Borough of Waltham Forest declared a Climate Emergency in April 2019. Strategically addressing the Climate Emergency is a key challenge facing the borough in delivering sustainable growth and development in the plan period and beyond and has shaped. As identified in the emerging Local Plan – careful management must be taken to minimise any further impact on the environment, and this can be achieved by ensuring that new development that comes forward in the plan period adds to the capacity for resilience in mitigating and adapts to any adverse climate change impacts.

Another issue surrounding climate change is the mitigation of flood risk which is of strategic importance in a borough that is surrounded by water courses.

London Plan Context

The London Plan states that successful cities must adapt to a changing world, and a focus on Good Growth provides an opportunity to become more efficient and resilient. A responsible city must limit its impact on climate change while adapting to the consequences of the environmental changes that human behaviour is already creating.

To achieve this, there must be active management set out in Local Plans to limit future contribution to this major global problem. This London Plan will require developments to contribute towards London's ambitious target to become zero-carbon by 2050. This will be achieved by increasing energy efficiency, by utilising smart technologies, and carbon energy sources. In addition, the creation of Low carbon circular economies, will assist the greatest possible value is extracted from resources before they become waste and contribute to this ambitious aspiration. Moreover, homes and infrastructure must be protected against the increasing likelihood of heatwaves, and developments must plan for a more integrated approach to water management, while minimising flood risk.

Evidence Base

- Strategic Flood Risk Assessment Part 1
- Draft Strategic Flood Risk Assessment Part 2

Strategic Partners

- The Environment Agency
- The Greater London Authority (GLA)
- Essex County Council
- Epping Forest District Council
- London Borough of Redbridge
- London Borough of Newham
- London Borough of Hackney
- London Borough of Enfield
- London Borough of Haringey
- The City of London (Conservators of Epping Forest)
- Natural England

Actions Taken

- Commission of the Strategic Flood Risk Assessments at Level 1 & 2

Outcome of Strategic Working

- Production of the Strategic Flood Risk Assessment and continual engagement to feed back to the strategic partners as listed above.

Ongoing Cooperation

The London Borough of Waltham Forest will continue to work with Strategic Partners on this issue with consideration given to growth in the borough and the likely effects impact it will have on the rivers and watercourses that are present inside our boundary.

4.13 Promoting Sustainable Waste Management

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| <p>Strategic Planning Issue</p> <p>The North London Waste Plan (NLWP) will set out the planning framework for waste management in the North London Boroughs for the next 15 years. It will identify sites for waste management use and set out policies for determining waste planning applications.</p> |
| <p>London Plan Context</p> <p>Para 9.8.7 of the New London Plan States “Boroughs should examine in detail how capacity can be delivered at the local level and demonstrate how this can be provided for through the allocation of sufficient sites and the identification of suitable areas in Development Plans to meet their apportionment, and should aim to meet their waste apportionment as a minimum. It may not always be possible for boroughs to meet their apportionment within their boundaries and in such circumstances boroughs will need to agree the transfer of apportioned waste. Where apportionments are pooled, boroughs must demonstrate how their joint apportionment targets will be met, for example through joint waste Development Plan Documents, joint evidence papers or bilateral agreements.”</p> |
| <p>Evidence Base</p> <p>Full Evidence base for the emerging North London Waste Plan (NLWP) developed with our strategic partners is available at: https://www.nlwp.net/document-centre/</p> |
| <p>Strategic Partners</p> <ul style="list-style-type: none">• The Greater London Authority (GLA)• London Borough of Barnet• London Borough of Camden• London Borough of Enfield• London Borough of Hackney• London Borough of Haringey• London Borough of Islington |
| <p>Actions Taken</p> |

The seven North London Local Planning Authorities of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest ('North London Boroughs') have joined forces to prepare the North London Waste Plan.

Outcome of Strategic Working

The adoption of the New North London Waste Plan (NWLP) which will set out the planning framework for waste management in the North London Boroughs for the next 15 years. It will identify sites for waste management use and set out policies for determining waste planning applications.

Ongoing Cooperation

Due to the strategic relationship that has been formed between the above-mentioned boroughs will continue to work in cooperation up to and after the NWLP has been adopted.

5.0 Key Relationships and Bodies

5.1 Table of Key Relationships and Bodies

| Prescribed Body | Summary of Engagement | Outstanding Issues |
|------------------------|--|--|
| The Environment Agency | The Council has engaged with the Environment Agency (EA) on the development of evidence and policies for the Local Plan. Several meetings with the EA were held to set up and discuss the progress on flood risk evidence (SFRA Levels I & II) and the development of policies. These initial recommendations led to the agreement of the updated SFRA and the amendment of draft policies to include comments and suggestions by the EA, which have been informally agreed. Specific comments on individual policies raised by the Environment Agency in response to the Local Plan Regulation 19 consultation are addressed through the Level II SFRA and the Council's responses and proposed changes to Strategic Policies in LP1. | Ongoing work with AECOM and The Environment Agency (EA) to finalise SFRA Level II Including the production of the SFRA Level 1 and 2 Which there is an identified need to produce flood modelling for both Chingbrook & Dagenham Brook |

| | | |
|----------------------------------|--|--|
| <p>Historic England</p> | <p>The Council has engaged with Historic England during all stages of the plan making process. In their representation at on the Regulation 18 Draft Local Plan Historic England wanted to ensure that the Archaeological Priority Areas were updated as this work had not been undertaken in approximately 30 years and there have been changes to the boundaries of APZ areas and their selection methodology in this time.</p> | <p>There are no outstanding issues.</p> |
| <p>Natural England</p> | <p>Ongoing work with Natural England to ensure that the “Protecting and Enhancing our Environment” chapter is sound for examination. Continuing cooperation with the allocation of a SANGS and SAMMS Strategy with other competent authorities to mitigate the cumulative impact of projected development on the Epping Forest SAC and SSSI. Development of an SPD to cover the Epping Forest.</p> <p>Mitigation of cumulative impact of development LVRP SPA, Green belt and other issues surrounding the Natural Environment in the borough.</p> | <p>Ongoing cooperation with Natural Council over the joint Strategic Issue of the Epping Forest SAC & SSSI and the allocation of SANGS and adoption of SAMMS Strategy.</p> |
| <p>Sport England</p> | <p>Worked in cooperation with Sport England to produce the 2020 Playing Pitch Strategy and Facility Planning Models for Sports Halls and Swimming Pools.</p> | <p>There are no outstanding Issues.</p> |
| <p>The Mayor of London (GLA)</p> | <p>Working in cooperation with the GLA on their issues arising from the regulation 18 and 19 Local Plan on the strategic matters of Housing, Affordable Housing,</p> | <p>There are no outstanding Issues.</p> |

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| | Employment Land, Culture, Tall Buildings, Air Quality, Waste Management and Transport | |
| Transport for London (TfL) | <p>Working in cooperation with TfL on their issues arising from the regulation 18 and 19 Local Plan on the Strategic Issues of with the plan on the strategic matters of; Small Sites, Housing in Multiple Occupation (HMO), Promoting Sustainable Transport, Hall Farm Curve, Developments and Transport Impacts, Construction Logistics Plans, Managing Vehicle Traffic, Electric Vehicles, Utilities and Digital Connectivity, Delivering the Plan and Parking Standards.</p> <p>The Council has engaged with TfL and our in-house highways team and transport colleagues in the commissioning of the Waltham Forest Strategic Transport Review, Transport Topic Paper and Traffic Modelling for the mitigation measures necessary in mitigation strategies for the Epping Forest SAC SSSI</p> | Ongoing work. |
| City of London (Conservators of Epping Forest) | <p>Ongoing work with Natural England to ensure that the “Protecting and Enhancing our Environment” chapter is sound for examination. Continuing cooperation with the allocation of a SANGS and SAMMS Strategy with other competent authorities to mitigate the impact of projected growth on the Epping Forest SAC and SSSI. Development of an SPD to cover the Epping Forest.</p> | Ongoing work |

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| Waltham Forest Clinical Commissioning Group (CCG) | Waltham Forest Clinical Commissioning Group (CCG) has been working with the Planning Policy team on strategic matters concerning the provision of health care facilities in the borough through the Local Plan period and the major planning application for the redevelopment of the Whipps Cross Hospital. | No outstanding issues with LP1 – ongoing work with the planning application relating to the redevelopment of the Whipps Cross Hospital. |
| Barts Health Group (Whipps Cross Hospital) | Ongoing collaboration with the Barts Health Group with regards to the healthcare provision in the Local Plan and the planning application for the redevelopment of the Whipps Cross Hospital | Ongoing work |

6.0 Relationships with other Local Authorities and Land Agents.

This section demonstrates how The Council has engaged with neighbouring boroughs and other relevant local authorities. Engagement has taken place via either:

- Regular liaison meetings relevant to the preparation of the London Borough of Waltham Forest Local Plan; and Individual engagement with local authorities;

Or

- Engagement with relevant local authorities.

6.1 Engagement with relevant local authorities and land agents.

| Authority / Organisation | Date | Summary of Engagement | Outstanding Issues |
|---------------------------------|--|--|--|
| The London Borough of Redbridge | 18/12/2020 15/01/2021 | SANGS, EFSAC, Transport, Cycle Lanes & Active Travel, Housing Need. Employment | Ongoing work to establish a joint SANGS / SAMMS mitigations strategy for the Epping Forest SAC SSSI between LBWF and the London Borough of Redbridge |
| The London Borough of Enfield | 02/12/2019 27/05/2020 02/03/2021 | Housing Need requirement, Employment | Links with Meridian Water and SANGS |
| The London Borough of Newham | 12/01/2018 | Housing, Should we oppose mayors | No Outstanding Issues |

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| | | housing targets / Employment / EFSAC. LLDC – pushing for wind-down deadline to be brought forward. | |
| The London Borough of Hackney | 16/01/2020 | <p>New Centre at Clapton / Potential Implications for Lea Bridge and Markhouse Corner and Leyton Town Centre.</p> <p>LP46 Protection and Enhancement of Green Infrastructure: B & C)</p> <p>LP47 Biodiversity and Sites of Importance of Nature Conservation refer to Epping Forest SAC mitigation and the HRA. Suggest urgent engagement with LBWF, NE and GLA</p> <p>LP49 Potential SANG</p> | No Outstanding Issues |
| The London Borough of Haringey | 10/03/2021 | DTC Letter Dated 23 rd Jan 2018 Highlighted no issues. | No Outstanding Issues |
| Essex County Council | 15/10/2019 | Essex County Council has offered to be a “Critical Friend” during the Local Plan Preparation and Examination | Ongoing joint Cooperation with Epping Forest District Council over the joint Strategic Issue of the Epping Forest SAC & SSSI |
| Epping Forest District Council | 03/10/2019 | Ongoing Mitigation of cumulative impact of development on the Epping Forest SAC & SSSI | Ongoing joint Cooperation with Epping Forest District Council over the joint Strategic Issue of the |

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| | | | Epping Forest SAC & SSSI |
| London Legacy Development Corporation (LLDC) | Over the years since the establishment of the LLDC | Strategic coordination has taken place over the years through Planning Policy Forum convened by the London Legacy Development Corporation (LLDC) for planning officers from authorities adjoining the LLDC area to working to ensure consistency between Local Plans. Meeting typically monthly, the group ordinarily consists of LBN, LLDC, LBTH, LBH, LBWF, and the Lea Valley Regional Park Authority. | Ongoing cooperation with the LLDC as the Corporation prepares for wind-down in Dec 2024 and the borough becomes planning authority for land currently in the LLDC Area. (LBWF boundary returning to previous parameters.) |
| The City of London Conservators of Epping Forest | 22/10/2018 05/12/2019 | Supportive of aspirational nature of growth-led vision, however this should be balanced with the protection and enhancement of Epping Forest. Agreement that Masterplans should play a key role in managing the coherent development of green and blue infrastructure within a green infrastructure network (4.31 page 23) and the provision of SANGS and SANGSC. Agreement that further work needs to be carried out to provide a suite of | Ongoing cooperation with the Conservators of Epping Forest regarding SANGS SAMMS and the emerging impact mitigation strategy. |

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| | | mitigation packaged to mitigate the air quality and recreational impact stemming from the growth delivered in the Local Plan. | |
| The Lee Valley Regional Park Authority | 28/11/2019 17/11/2020 | Terms of Reference, SANGS | Ongoing dialogue surrounding SANGS allocations on LVRPA Land. |
| The Greater London Authority (GLA) | 21/10/2019 | Deferred transport meeting from TfL. Development matters and Whole Plan Viability and deliverability of affordable housing and employment space / co-location / industrial. BEA / LSIS. | SANGS and EFSAC Mitigation. |

6.2 EFSAC Cooperation for Sustainable Development Board

In addition to this, The London Borough of Waltham Forest has been actively engaged with the following authorities in its capacity as a competent Local Authority in the Cooperation for Sustainable Development Board which discusses strategic matters surrounding mitigation measures on the Epping Forest SAC and SSSI with the following Authorities:

The Greater London Authority (GLA)
The City of London Conservators of Epping Forest (COLC)
Essex County Council (ECC)
Hertfordshire County Council

The London Borough of Redbridge
The London Borough of Newham
The London Borough of Enfield
The London Borough of Newham
The London Borough of Hackney
The London Borough of Haringey
The London Borough of Tower Hamlets
The London Borough of Havering
The London Legacy Development Corporation (LLDC)

Epping Forest District Council
Harlow Council
East Herts Council

Uttlesford District Council
Braintree District Council
Tendring District Council
Colchester City Council
Broxbourne Council

6.3 EFSAC Governance Group

Since February 2021 there has been a new focused SAC Governance Group set up between the following organisations;

Natural England
The City of London Corporation – Conservators of Epping Forest
Greater London Authority (GLA)
The London Borough of Waltham Forest
Epping Forest District Council
Harlow Council
London Borough of Enfield
London Borough of Redbridge
London Borough of Hackney