



‘Shaping the Borough’ - Waltham Forest Local Plan (LP1) Examination

Response to the Inspectors’ Preliminary Matters

(1) Duty to Cooperate

August 2021

Paragraph 7 of Inspectors' Letter

The Council should provide further details including, as relevant and appropriate, dates of meetings, workshops or discussions, minutes and notes of such engagement, and summaries in chronological order of the purposes of the meeting / workshop / discussion, who attended, the strategic planning issues discussed, identified outcomes or actions and any agreements or disagreements between any parties.

1. Below is a table detailing the meetings that the London Borough of Waltham Forest has engaged with Local Authorities and other organisations on the duty to cooperate. This table follows on from the [KD7 Duty-to-Cooperate Statement](#) which details the breadth of engagement undertaken with duty to cooperate partners throughout the preparation of the LP1 document.

LBWF Meetings with DUTY TO COOPERATE Bodies

Strategic Matter	Duty to Cooperate bodies involved	Strategic Issue/matters	Meeting dates
Housing	GLA (Housing and Land Team)	Housing delivery, Local Plan progress, Strategic Sites	Quarterly meetings – recent meetings as follows: 21/10/2020, 28/08/2020, 22/05/2020, 28/02/2020, 18/01/21, 28/05/2021,
	GLA & London Boroughs	London SHLAA and SHMA projects	04/05/2017, 15/05/2017, 24/11/2017
Economy and Employment Land	GLA, LB Haringey, LB Enfield	Productive Valley - Upper Lee	12/05/2017, 24/06/21
	London Boroughs - London Housing Network	Intensification of Strategic Industrial Land	22/03/2018
	Greater London Authority (GLA),	Lea Bridge Gateway industrial intensification	03/2020, 05/2020, 27/01/2020
	Greater London Authority (GLA)	Creative Enterprise Zone	22/04/2020, 13/08/2020, 25/08/2020
	Greater London Authority (GLA)	LBWF Approach to Employment Land	21/10/2019
	London Boroughs - Local London Policy Officers	Industrial Strategy – East London	21/06/2018
	LB Haringey, LB Enfield, Broxbourne DC, GLA	Upper Lee Valley Development Opportunities/Potential	15/04/2019
	Greater London Authority (GLA)	Planning for industrial capacity in Waltham Forest	14/11/2019

Strategic Matter	Duty to Cooperate bodies involved	Strategic Issue/matters	Meeting dates
	Greater London Authority (GLA) & London Boroughs	GLA High Streets Data seminar	23/02/2020
Transport			
	TfL, LB Haringey, LB Hackney, Broxbourne DC, GLA	Upper Lee Valley Transport Study - Growth Scenarios Workshop	12/05/2017
	TfL, LB Redbridge, Epping Forest District Council	Central Line Transport and Growth Capacity	Workshop – 17/05/2017
	TfL	Lea Bridge and Leyton Growth Area	Regular meetings with TfL on transport matters. Recent meetings on 08/09/2021, 07/09/2021, 15/07/2021, 22/06/2021
	TfL	Leyton Mills Development Framework	Project team meetings regularly undertaken. Recent meeting 27/07/2021
	TfL/London Boroughs	ULEZ	Recent meetings on 15/01/2020, 02/06/2021, 12/07/2021,
	Public Transport operators – e.g. TfL Buses, Stagecoach, Barking-Gospel Oak Rail User Group etc.	Public Transport provision /liaison issues	Regular Public Transport Consultative Group meetings - recent meetings on 22/09/2020, 08/01/2021, 22/01/2021, 24/02/2021, 08/07/2021,
	TfL	Leyton Underground Station	Leyton Underground Steering Group (Regular meetings). Recent meetings on 24/07/2019, 17/02/2020, 01/02/2021, 30/04/2021, 25/06/2021,

Strategic Matter	Duty to Cooperate bodies involved	Strategic Issue/matters	Meeting dates
	TfL	Walthamstow Central Station/Interchange project	Series of meetings including the following dates: 10/09/2019, 28/05/2020, 25/06/2020, 23/07/2020, 04/11/2020, 13/01/2021, 26/02/2021, 06/04/2021, 28/04/2021, 19/05/2021, 21/06/2021,
	TfL	Ruckholt Road/Leyton and Lea Bridge	21/07/2020, 09/12/2020 28/01/2021, 16/06/2021
	TfL	Whipps Cross Hospital development	27/11/2020, 07/01/2021, 30/04/2021, 25/05/2021
	TfL	Temple Mills Lane - Bus Depot	24/05/2021
	DfT, HS1 and Eurostar	Ruckholt Road Station	Workshops/meetings - 02/08/2019, 20/08/2020, 21/10/2020, 19/05/2021, 17/03/2021
	TfL, CoLC, TfL and GS	Leyton Mills Development Framework - Bus Transport	Workshop - 18/05/2021
	GLA	GLA Development Funding: Child - Friendly Cities- Chingford Mount	06/05/2021
	TfL, LBH	LBWF and Knowledge Sharing Workshop	Workshop/Meeting - 06/01/2021, 28/04/2021
	TfL	Restart and Recovery Roundtable - The role of buses in London's recovery	28/04/2021, 10/03/2021
	GLA	GLA data workshop	Workshop - 25/02/2021

Strategic Matter	Duty to Cooperate bodies involved	Strategic Issue/matters	Meeting dates
	TfL	TfL/LBWF - LBWF Area Review	Quarterly Transport Liaison meetings. Recent meetings on 05/02/2018, 29/05/2019, 14/12/2020
	TfL	London Borough of Waltham Forest- Draft Local Plan Duty to Cooperate with TfL	24/09/2019
	Network Rail	Meeting to discuss Ruckholt Road Station	07/05/2019
	TfL, North London Boroughs	North London Transport	Partnership Meetings - 17/04/2018, 13/08/2018, 01/02/2019
	LB Enfield	Crossrail 2 Growth	10/05/2017
Health	East London Health & Care Partnership – also incorporating NHS CCGs – Tower Hamlets, Newham	ELHCP Estates Operational Working Group	15/08/2019, 17/09/2019, 15/11/2019, 18/12/2019, 23/01/2020, 20/02/2020
	East London NHS organisations	WF Integrated Care Strategy partner engagement	14/08/2019
	NHS Tower Hamlets CCG, NHS England, NHS Newham, Barts NHS Trust, East London & Health & Care Partnership	Waltham Forest Estates Strategy	19/11/2019
Climate and Renewable Energy	London Boroughs	London Environment Coordinators Forum	Regular meetings - 16/06/2021, 18/03/2021, 16/03/2021, 02/12/2020,

Strategic Matter	Duty to Cooperate bodies involved	Strategic Issue/matters	Meeting dates
			10/09/2020, 18/06/2020, 12/09/2019, 24/05/2019
	London Boroughs & GLA	Pathway towards Carbon Zero	24/05/2019
	London Boroughs & GLA	Energy Assessment	28/03/2018
Natural Environment	Conservators of Epping Forest	Statement of Common Ground	22/07/2021
	Natural England	Statement of Common Ground	09/07/2021
	Coop Officer Group – involving Epping Forest DC, Conservators of Epping Forest, Natural England, LB Haringey, LB Enfield, GLA, Uttlesford DC, Harlow DC etc,	Duty to Cooperate on local plan matters – including EF SAC	18/05/2017, 13/05/2021
	NE/Conservators of Epping Forest	SANGS Strategy - site identification	21/04/2021
	MoU Oversight Governance Group - involving Epping Forest DC, Conservators of Epping Forest, Natural England, LB Haringey, LB Enfield, GLA, Uttlesford DC, Harlow DC etc,	Epping Forest SAC	21/02/2018, 25/07/2018, 05/03/2021, 25/02/2021, 12/02/2021, 21/01/2021, 11/11/2020, 05/06/2020, 24/02/2020
	London Boroughs EFSAC ZOI boroughs including LB Newham, LB Haringey, LB Hackney, LB	A London Approach to EFSAC Mitigation	18/02/2020

Strategic Matter	Duty to Cooperate bodies involved	Strategic Issue/matters	Meeting dates
	Redbridge), Conservators of Epping Forest and GLA		
	Epping Forest DC	EFDC Duty to Cooperate	06/02/2018, 29/11/2018, 03/10/2019
	North East London Boroughs	Scope of mitigation and mechanisms for collection	09/09/2019
	LB Redbridge, Natural England	Epping forest SAC/mitigation – Duty to Cooperate	12/11/2018
	Epping Forest DC, Essex CC, East Hertfordshire DC, Harlow DC, LB Enfield, Natural England, Broxbourne, City of London	Air Quality	08/08/2017
	Lee Valley Regional Park Authority	Local Plan duty to cooperate	28/11/2019
	Sports England	Local Plan – duty to cooperate meeting	15/01/2020
Heritage Assets	Historic England / Place Services (ECC)	Priority Areas Stage 3 Meeting	20/11/2020
	Historic England / Place Services (ECC)	Interim Results Meeting	26/08/2020
	Historic England	Contract Tender board meeting	19/06/2020
	Historic England	Archaeological Priority Areas re-draw inception	20/05/2020
	Historic England / LBWF	Archaeological Priority Areas Review	12/03/2020

Strategic Matter	Duty to Cooperate bodies involved	Strategic Issue/matters	Meeting dates
	Historic England / LBWF	Duty to Cooperate Meeting	11/11/2019, 21/07/2021
Waste	North London Waste Plan Planning Officer Group (NLWP POG) ¹	Waste planning	Regular meetings: 5/10/2017, 12/12/2017, 24/04/2018, 19/06/2018, 13/07/2018, 04/09/2018, 12/08/2019, 30/01/2020, 10/08/2020, 17/08/2020, 11/01/2021, 08/02/2021
	London Boroughs + other organisations responsible for waste planning (London Waste Planning Forum)	Waste planning	Regular meetings: 26/04/2017, 19/10/2017, 08/01/2019, 20/03/2019, 10/07/2019, 29/01/2020, 14/10/2020
General plan making/development matters	LB Enfield	Local Plan matters - liaison/briefings	Periodic meetings: 19/02/2018, 25/01/2019, 02/12/2019, 10/08/2020
	LB Enfield	Meridian Water proposals	08/4/21, 11/06/21
	LB Hackney	Local Plan matters - catch meeting/liaison/briefings	Periodic meetings: 05/05/2017, 11/12/2017, 23/10/2019, 16/01/2020
	LB Haringey	Local Plan matters - catch meeting/liaison/briefings	23/01/2018, 10/03/2020

¹ The North London Waste Plan group comprises officers from seven north London boroughs: Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest. LB Camden is the lead authority.

Strategic Matter	Duty to Cooperate bodies involved	Strategic Issue/matters	Meeting dates
	London Boroughs Association of London Borough Planning Officers (ALBPO)	London wide planning matters	Regular meetings: 16/05/2017, 21/11/2017, 16/02/2018, 01/05/2018, 13/11/2018, 12/03/2019, 04/04/2019, 02/07/2019, 16/07/2019, 17/09/2019, 12/11/2019, 15/09/2020
	London Boroughs	London-Wide Planning and Development Data Collaboration	25/05/2018
	LB Newham	Local Plan matters - catch meeting/liaison/briefings/DtC	26/05/2017, 19/07/2021
	London Legacy Development Corporation (LLDC) – Planning Policy Forum	Local Plan matters - catch meeting/liaison/briefings/DtC	15/10/2017, 13/11/2017, 22/05/2019, 17/01/2020, 22/01/2020
	City Corporation of London	LBWF & City Corporation of London Partnership Meetings	18/01/21, 03/03/21, 23/04/21, 07/07/21
	Essex County Council	LBWF - Local Plan matters & ECC Minerals Local Plan	15/10/2019, 02/10/2019
	Greater London Authority (GLA)	LBWF & GLA Local Plan/London Plan – general matters	21/10/2019

Paragraph 8 of Inspectors' Letter

Ten strategic planning issues for the borough are set out in Section 4.0 of the DtC Statement. Can the Council clarify how and when these strategic matters were identified, which organisations were involved in their identification, and what actions have been taken to address them where they have cross-boundary implications?

- 1.1 S33A of the Planning and Compulsory Purchase Act define “strategic matter” as (a) 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 impact on at least two planning areas. However, it does not explicitly state which issues could be a strategic matter, so the Council has also had regard to guidance in the NPPF, which mentions that local planning authorities are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.
- 1.2 Regarding the NPPF, paragraph 20 mentions that strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:
 - housing (including affordable housing), employment, retail, leisure and other commercial development.
 - infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat).
 - community facilities (such as health, education and cultural infrastructure); and
 - conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.
- 1.3 These NPPF prescribed matters have been used as a starting point in identifying the strategic matters the new Local Plan should consider. Paragraph 17 of the NPPF mentions that the development plan must include strategic policies to address each local planning authority’s priorities for the development and use of land in its area and these strategic policies can be produced in different ways, depending on the issues and opportunities facing each area and also that they can be contained in a spatial development strategy produced by an elected Mayor or combined authority, where plan-making powers have been conferred. Accordingly, due regard has been given to the strategic policy matters contained in the London Plan. These include:
 - Housing
 - Infrastructure
 - Economy
 - Heritage and Culture
 - Green Infrastructure and Natural Environment
 - Transport
 - Minerals and Waste
- 1.4 Early in the plan making process, the Council recognised that decisions on the above matters and indeed others will require cooperation with ‘duty to cooperate’ partners as policies or proposals may cross the Council’s administrative boundaries, have

'larger than local' implications, require collaborative approaches or may have direct or cumulative impacts some distance away from the borough. It was also considered that an understanding of strategic relationships across London was necessary and therefore the need for joint working on some projects.

Strategic Relationships – The London Context

- 1.5 Waltham Forest Council is a member of London Councils, a cross-party organisation that represents London's 32 boroughs and the City of London Corporation. London Councils represents its members to the Government, the Mayor of London and any other bodies. London Councils runs a number of committees, networks and forums. In relation to planning issues, the Association of London Borough Planning Officers (ALBPO) is run by London Councils. Waltham Forest Council's Planning Policy Officers attend the regular meetings of the ALBPO Development Plans Committee and the ALBPO Policy Officers Sub-Group where strategic cooperation through information and evidence sharing, consensus building on policy alignment and joint working matters are discussed. This arrangement has supported cross-boundary working for many years.
- 1.6 Regarding the application of the 'Duty to cooperate' requirements in London, National Planning Policy Guidance mentions that the degree of cooperation needed between parties will depend on the extent to which strategic matters have already been addressed in the spatial development strategy. In this regard, the Greater London Authority (GLA) has an important role. Waltham Forest has maintained a positive relation with the GLA, working together on the London Plan and the Council's Local Plan.
- 1.7 The London Plan 2021 is the Spatial Development Strategy for Greater London. It sets out a framework for how London will develop over the next 20-25 years and the Mayor's vision for Good Growth. The London Plan is part of the statutory development plan for London, meaning that the policies in the Plan should inform decisions on planning applications across the capital. Individual borough Local Plans must be in 'general conformity' with the London Plan, ensuring that the planning system for London operates in a joined-up way and reflects the overall strategy for how London can develop sustainably.

Role of the Waltham Forest Direction of Travel Document

- 1.8 Mindful of the above and with the policy steer provided by the NPPF and the London Plan, the Council published its 'Direction of Travel' document (DoT) in December 2017 (SD6). The purpose of this document was to help set the strategic direction for development and seek consensus on the matters and issues the plan must consider. Building on the Council's corporate strategies as identified at the time and acknowledging the need to address plan making challenges collaboratively with its partners, including the GLA and national government departments, Barts Health NHS Trust, Colleges and Schools, Metropolitan Police Service, Voluntary and Community Sector Organisations, Waltham Forest NHS Clinical Commissioning Group, Transport for London, businesses, investors and developers, the Council published the Direction of Travel document for consultation in December 2017.
- 1.9 The DoT document set out the Council's aspirations to transform the borough and address key challenges. It represented the first stage in our engagement process with residents, business, and other stakeholders on what the vision for the Borough should be, the strategic matters the new Local Plan should address and contain. It

sought to seek consensus on the strategic matters identified. Engagement with stakeholders including the prescribed duty to co-operate bodies during the consultation stage helped to identify and focus strategic issues on a set of policy themes as presented below.

- 1.10 Although the evidence base informing the DoT document was 4 years ago, the same broad strategic issues remain relevant. These have been subsequently refined to cover the matters currently included in the Proposed Submission Plan (KD1) and reflect the broad strategic matters arising from the NPPF and the London Plan.
- 1.11 Cross boundary implications exist with regard to the following strategic matters as set out in the table below.

Strategic matter	Local Plan (LP1) Policy Theme
Housing	Decent Homes for Everyone (Chapter 8)
Employment	Building a Resilient and Creative Economy (Chapter 9) & Distinctive Town Centres and High Streets (Chapter 11)
Infrastructure	Social and Community Infrastructure (Chapter 12), Promoting Health & Well-being (Chapter 13), Active Travel, Transport & Digital Infrastructure (Chapter 15)
Heritage	Enhancing and Preserving our Heritage (Chapter 16)
Natural Environment	Protecting and Enhancing the Environment (Chapter 17)
Climate Change	Addressing the Climate Change Emergency (Chapter 18)
Waste	Promoting Sustainable Waste Management (Chapter 19)

- 1.12 Consensus on the strategic matters is demonstrated from the outcome of the DoT consultation. No objections or disagreements in principle were received from stakeholders and Duty to Cooperate partners.

Cross boundary implications

- 1.13 The policy approach set out in the emerging Local Plan represents the outcome of consultation work also involving careful consideration of cross boundary implications with the GLA and neighbouring boroughs. As background, the Council has a strong history of engagement and partnership working with other authorities, stakeholders, and public bodies. Actions undertaken to address cross boundary issues have been facilitated through the following actions:
- Collaboration on evidence base projects
 - Information sharing on individual projects
 - Joint projects
 - Aligned policies/approaches
 - Consultation/participation
- 1.14 The table below sets out the key organisations involved in cross-boundary matters and the approach taken in addressing such issues.

Strategic matter	Key DtC organisations involved	Cross-boundary implications and actions taken.
<p>Housing</p> <p><u>Local Plan Policy Theme:</u> Decent Homes for Everyone</p>	<p>Greater London Authority (GLA) Neighbouring Boroughs - LB Redbridge, LB Haringey, LB Hackney, LB Enfield, LB Newham</p>	<p>The key cross boundary issue relates to the housing market area (HMA), acknowledging that in practice, this will go beyond the borough's boundary.</p> <p>In addressing this, the Council followed established protocols for joined up working in London. This involves collaborative working with the GLA on evidence base projects, discussions at GLA organised workshops/events, ALBPO meetings involving the GLA and all London Boroughs, as well as neighbouring borough DtC meetings. Key outcomes relate to cooperation on evidence base preparation, using shared evidence and data sources as well as information sharing on individual borough projects.</p> <p><u>Assessing Needs</u> London wide cooperation in developing the evidence base is led by the GLA with full participation by all London boroughs, for example on the London wide Strategic Housing Market Assessment (SHMA). For the purposes of the London Plan, London is considered as a single housing market area, with a series of complex and interlinked sub-markets. Developing the evidence involved the definition of HMAs, assembling the evidence and sharing study findings. To establish Objectively Assessed Need for the borough, the Council carried its own study (Waltham Forest SHMA) in 2017. This study considered other SHMA projects undertaken in the sub-region including Outer North East London SHMA (2016) covering the London Boroughs of Barking and Dagenham, Havering, Newham, Redbridge and Waltham Forest. The study report was shared publicly, also with neighbouring local authorities and the GLA.</p> <p><u>Meeting Needs</u> The London Plan provides a housing target for each London Borough. The Council has sought to meet its London Plan housing target by identifying suitable sites within its boundaries to meet this requirement and address local need. In accordance with the London Plan, the Council has applied a target of 1264 per annum for the first 5 years of the plan, which aligns with our identified 5-Year housing land supply position with an increase in delivery above the London Plan target beyond this period. This seeks to narrow the gap between need and supply</p>

Strategic matter	Key DtC organisations involved	Cross-boundary implications and actions taken.
		<p>as far as possible. Monitoring housing delivery is done through the Waltham Forest Authority Monitoring Report which is publicly available. London wide cooperation on development monitoring is led by the GLA with all London boroughs participating through the Quarterly Planning Data Huddle meetings. In meeting unmet needs from other local planning authorities, the Council has been open to such discussions. The Council considered request from LB Enfield, but mindful of the scale of the Council's own need and the challenges associated, was unable to accommodate this request.</p> <p><u>Land Availability Assessment</u> The Council fully participated in the London Strategic Housing Land Availability Assessment (SHLAA) from which the London Plan Housing targets was derived. However, as the Council can only allocate sites within its borough boundaries, it was not practical to prepare a joint Land Availability Assessment with neighbouring boroughs.</p> <p><u>Gypsy & Traveller Accommodation</u> In accordance with the Government planning policy for Traveller Sites (2015), the Council is required as part of its plan-making process to assess and plan for the needs of the travelling community. Government guidance states that Local Planning Authorities should set pitch targets for gypsies and travellers and plot targets for travelling showpeople, which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities.</p> <p>To provide a robust assessment of current and future need for Gypsy, Traveller and Travelling Showpeople, the Council has undertaken a Gypsy and Traveller Accommodation Assessment (GTAA) – working collaboratively with neighbouring planning authorities. To help support the Duty-to-Cooperate and provide background information for the study, telephone interviews were conducted with Planning Officers in neighbouring planning authorities. The GTAA study is published on the Council's Evidence Base page. This document includes notes of</p>

Strategic matter	Key DtC organisations involved	Cross-boundary implications and actions taken.
		discussions with neighbouring authorities on cross boundary issues and the Duty to Cooperate.
<p>Infrastructure</p> <p><u>Local Plan Policy Themes:</u></p> <p>a) Social and Community Infrastructure</p> <p>b) Promoting Health & Well-being</p> <p>c) Active Travel, Transport & Digital Infrastructure</p>	<p>Greater London Authority (GLA)</p> <p>Neighbouring Boroughs - Redbridge, Haringey, Hackney, Enfield, Newham & Epping Forest DC.</p> <p>Transport for London</p> <p>Thames Water</p> <p>Barts NHS Health Trust</p> <p>NHS – Clinical Commissioning Group</p> <p>Metropolitan Police</p> <p>North London Waste Authority</p>	<p>The Council recognises the need to work together with public and private sector partners to ensure that sufficient capacity is available or can be delivered to support growth. Accordingly, the Council has sought to investigate any cross-boundary infrastructure issues arising from development with adjoining boroughs also noting the key strategic relationship with the GLA through the London Infrastructure Plan 2050.</p> <p>The Council’s Infrastructure Delivery Plan (KD12) has been produced from information provided by infrastructure providers and stakeholders as part of liaison work/joined up working. Key projects listed as ongoing and under consideration in this document have been discussed with the identified infrastructure providers covering: Transport, Digital Communications, Energy, Water Supply & Sewage, Emergency Services, Health, Education & Childcare/Early Years Facilities, Culture, Sport & Leisure etc.</p> <p>A key flagship proposal of the Local Plan is the redevelopment of Whipps Cross Hospital being delivered in partnership with Barts NHS Health Trust. The hospital serves a diverse local catchment population from Waltham Forest, Redbridge, Epping Forest and further afield.</p> <p>Two national infrastructure projects in the sub region include Deephams Sewage Treatment Works in North East London and the North London Heat and Power Project. Both had cross-boundary implications for Waltham Forest. The Deephams Sewage Treatment Works (STW) upgrade project is located in the London borough of Enfield. The Council cooperated on this project, noting in particular the improvements in odour emissions benefitting Waltham Forest residents.</p> <p>Waltham Forest is a member of the North London Waste Authority, which includes the London boroughs of Barnet, Camden, Enfield, Hackney, Haringey and Islington. The NLWA is governed by 14 members, two councillors from each</p>

Strategic matter	Key DtC organisations involved	Cross-boundary implications and actions taken.
		<p>of the seven north London boroughs. This provides the opportunity for collaboration on cross boundary matters.</p> <p>The Council has strong links with the various infrastructure providers that service the borough, including Thames Water, UK Power Networks, Cadent (Gas), National Grid and various digital connectivity providers. This cooperative working relationship will continue in ensuring the implementation and delivery of plan policies and proposals.</p>
<p>Economy and Employment land.</p> <p><u>Local Plan Policy Theme:</u></p> <p>a) Building a Resilient and Creative Economy</p> <p>b) Distinctive Town Centres and High Streets</p>	<p>Greater London Authority (GLA) Neighbouring Boroughs - Epping Forest DC, LB Redbridge, LB Haringey, LB Hackney, LB Enfield, LB Newham</p>	<p>Cross boundary considerations relate to the fact that economic activity will seldom follow Waltham Forest borough boundaries. For example, the roles of town centres in the sub-region will be important and where a town centre has an influence that crosses administrative boundaries, it is necessary to ensure that the impact of retail policies are fully understood across the different locations and are consistent with other plan policies. Accordingly, getting the right geographic area for analysis and working strategically is important.</p> <p><u>Assessing needs</u> The GLA led on London wide key studies including the London Employment Sites Database 2017, London Industrial Land Demand 2017, London Office Policy Review 2017, Consumer Expenditure and Comparison Goods Floorspace Need in London 2017, and the London Town Centre Health Check Analysis 2017. Waltham Forest participated with the GLA and all other London Boroughs through meetings/workshops on these studies, which provided a common understanding of the strategic issue and helped to establish the local policy direction for the Waltham Forest Local Plan. In supplementing London-wide evidence, the Council assessed local employment need separately through the preparation of the Waltham Forest Employment Land Study 2019, using GLA data sources and base forecasts developed at the strategic level for London. This document was shared with neighbouring authorities. Similarly, the Council prepared its own Retail and Town Centres Study (2019) informed by the GLA's 2017 London Town Centre Health Check and baseline estimates/data.</p>

Strategic matter	Key DtC organisations involved	Cross-boundary implications and actions taken.
		<p><u>Meeting needs</u> London Plan policies require boroughs to meet strategic employment needs. The need to safeguard employment land is a strategic issue set by the London Plan. Strategic employment designations as Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIL) from the London Plan have been carried forward to the Council’s Local Plan – using same methodology and policy approach. This also aligns with Local Plan policies in neighbouring London boroughs.</p> <p>On town centres, the London Plan identifies and defines the town centre network across London. Managing growth and change in town centre functions is strategically coordinated by the GLA. For example, the classification of centres as International, Metropolitan and Major town centres can only be changed through the London Plan. Actions to address cross boundary implications have therefore followed protocols on collaborative working between the GLA and the London boroughs.</p>
Transport <u>Local Plan Policy Theme:</u> Active Travel, Transport	Greater London Authority (GLA) Transport for London (TfL)	<p>In identifying transport as a strategic matter, the Council considered that most development, large or small, could individually or cumulatively impact on transport and travel patterns across a wide geographical area. Therefore, ensuring the right infrastructure is provided in accordance with any shared strategic priorities established across London and the sub-region was important.</p> <p>The starting point in identifying transport as a strategic matter comes from the London Plan and Waltham Forest Transport Local Implementation Plan (LIP). In London, TfL is the integrated transport authority responsible for delivering the Mayor of London’s commitments on transport. TfL run the day-to-day operation of the Capital's public transport network and manage the borough’s main roads, bus services and the Underground. The Council has worked with TfL throughout the plan making period.</p>

Strategic matter	Key DtC organisations involved	Cross-boundary implications and actions taken.
		<p>The Council has a statutory duty to prepare a Local Implementation Plan (LIP). This is prepared under Section 145 of the Greater London Authority Act 1999 and sets out how individual boroughs intend to deliver the London Mayor’s Transport Investment Strategy (MTS) in its area, as well as contributing to other local and sub-regional goals. It also takes account of the transport elements of the London Plan, other relevant Mayoral and local policies in the Council’s New Local Plan and Transport Investment Strategy.</p> <p>Cross boundary implications are directly coordinated by the GLA and TfL. To clarify, TfL is a statutory body created by the Greater London Authority (GLA) Act 1999. This Act gives the Mayor of London a general duty to develop and apply policies to promote and encourage safe, integrated, efficient and economic transport facilities and services to, from and within London. Resources particularly for transport to secure the optimum development of growth areas and corridors in London as a whole and those parts which lie within London are made available by the Mayor of London. Cross boundary transport issues are discussed through regular TfL Liaisons meetings with the Council’s Transport and Planning Policy Officers.</p> <p>Key transport proposals mentioned in the Waltham Forest Local Plan is the Ruckholt Road New Rail Station, Walthamstow Central Station Transport interchange and the Leyton Underground Station improvements. These projects identified in the Waltham Forest Transport Local Implementation Plan, have been the outcome of discussions and agreements ‘in principle’ support from Network Rail and TfL. These organisations have responsibility in ensuring London-wide connectivity to the transport network.</p>
<p>Climate change and renewable energy</p> <p><u>Local Plan Policy Theme:</u></p>	<p>Greater London Authority (GLA) Environment Agency Neighbouring Boroughs - Epping Forest DC, LB Redbridge, LB Haringey, LB Hackney, LB Enfield, LB Newham</p>	<p>Climate change is a strategic priority from the NPPF and the London Plan and accordingly has been framed as a strategic issue in the Council’s Local Plan (LP1). Furthermore, the Sustainability Appraisal (SA) scoping report produced by the Council to inform local plan preparation also highlighted the need to address this issue strategically. About cross boundary implications, the Council considered that the impacts of climate change would not necessarily reflect local planning areas and tackling the causes (mitigation) and consequences (adaptation) of</p>

Strategic matter	Key DtC organisations involved	Cross-boundary implications and actions taken.
Addressing the Climate Change Emergency		<p>climate change effectively will often require collaborative approaches across authority boundaries.</p> <p>Actions to address this issue has involved cooperation on London wide basis on carbon and renewable energy generation and collaboration in developing and sharing data/evidence. These have been coordinated by the GLA, London Boroughs and the Council working together with several partners through studies.</p> <p>The Council has adopted a Climate Change Strategy and more recently declared a Climate Emergency. The actions in these strategies developed between the Council and community partners have sought to promote energy efficiency, green spaces, transport, waste reduction, managing flood risk etc.</p> <p>Collaboration on climate change matters takes place through the London Environment Coordinators Forum (LECF), which brings together people leading on environmental issues and the implementation of sustainable development in the public sector in London. Knowledge, experience and ideas are shared through quarterly meetings and the work of sub-groups. There is also the London Boroughs' Energy Group set up to facilitate effective working on energy related issues between public sector bodies in London, focusing primarily on all London Boroughs.</p> <p>On flooding especially, cooperation with the Environment Agency has taken place throughout the plan making stages. Studies commissioned by the Council on Strategic Flood Risk Assessments have been directed and agreed by the Environment Agency.</p>
Natural Environment	Greater London Authority (GLA) Natural England Environment Agency	The NPPF sets out how the planning system should conserve and enhance the natural environment noting that Councils will need to demonstrate an understanding of the impacts of development proposed in their local plan on the environmental assets that may be affected, wherever they may be located. NPPF

Strategic matter	Key DtC organisations involved	Cross-boundary implications and actions taken.
<p data-bbox="203 264 344 363"><u>Local Plan Policy Theme:</u></p> <p data-bbox="203 400 371 564">Protecting and Enhancing the Environment</p>	<p data-bbox="405 264 931 432">Neighbouring Boroughs - Epping Forest DC, LB Redbridge, LB Haringey, LB Hackney, LB Enfield, LB Newham City of London (Conservators of Epping Forest)</p>	<p data-bbox="976 264 2007 328">(Paragraph 179) highlights the need to take a strategic approach to maintaining and enhancing networks of habitats.</p> <p data-bbox="976 368 2007 464">In identifying this as a strategic matter, the Council considered that it was important to work with duty to cooperate partners in preparing the evidence and where necessary, have joint or aligned policies.</p> <p data-bbox="976 504 2042 663">Once again, the London Plan set the strategic basis for including this matter in the Local Plan. Policy 2.18 of the London Plan on Green Infrastructure supports the establishment of a multi-functional network of green and open spaces throughout London. This requires cross boundary working and agreement coordinated at the London Plan level.</p> <p data-bbox="976 703 1962 863">Cross boundary working has been facilitated through close working with key partners as identified, sharing of evidence and collaboration on projects – including Green Belt Reviews and Green and Blue Infrastructure Study. The methodology for carrying out the Green Belt review was discussed with neighbouring boroughs at workshop events.</p> <p data-bbox="976 903 2029 1206">The strategic issue regarding Epping Forest SAC is addressed separately in the Council’s response to the Preliminary Matter on the Conservation of Habitats and Species. The Council collaborated with neighbouring boroughs and Natural England in funding the Epping Forest Visitors Survey 2017 and is a member of the Oversight Group set up for collaborative working to address issues facing the Forest. Current ongoing work to identify SANG sites have involved site visits with representatives from Clear Lead (Council’s HRA consultants), Waltham Forest planning policy officers, Natural England and the City of London (Conservators of Epping Forest).</p> <p data-bbox="976 1246 2042 1374">Regarding air quality, strategic coordination is also delivered through the GLA. The GLA has established a London specific Local Air quality Management system for the effective and coordinated discharge of all London boroughs responsibilities under the Environment Act 1995. The GLA provide technical guidance to support</p>

Strategic matter	Key DtC organisations involved	Cross-boundary implications and actions taken.
		all London boroughs including Waltham Forest in preparing Air quality Action Plans to ensure a coordinated approach throughout London.
<p>Heritage</p> <p><u>Local Plan Policy Theme:</u></p> <p>Enhancing and Preserving our Heritage</p>	<p>Historic England</p> <p>Neighbouring Boroughs - Epping Forest DC, LB Redbridge, LB Haringey, LB Hackney, LB Enfield, LB Newham</p>	<p>The cumulative impact of smaller developments over a wide geographic area could sometimes be harmful to some heritage assets. Accordingly, the Council considered the need to work together with Historic England, the GLA and neighbouring boroughs to ensure consistent and complementary policies.</p> <p>The Waltham Forest Characterisation and Intensification was commissioned in response to earlier concerns from Historic England about the need to sensitively manage growth to protect heritage assets, listed buildings or conservation areas. In addition, a comprehensive review of Archaeological Priority Areas for the borough was commissioned as a partnership project between the Council and Historic England.</p> <p>This work directed by Historic England, assessed the significance of heritage assets and the contribution they make to their environment following the strategic direction set out in the London Plan - Policy HC1 (Heritage conservation and growth). Boroughs are required to consult with Historic England to develop evidence that demonstrates a clear understanding of London's Historic Environment and to use this evidence to inform effective integration of London's heritage in regenerative change. The review of Archaeological Priority Areas (APA) interfaced with same work in neighbouring London boroughs. This also involved consultation meetings with representatives of Greater London Archaeology Advisory Service (GLAAS) and other groups with a particular interest or expertise in historic matters.</p>
<p>Waste and Minerals</p> <p><u>Local Plan Policy Theme:</u></p>	<p>Greater London Authority (GLA), London Boroughs of Barnet, Camden, Enfield, Hackney, Haringey and Islington.</p>	<p>It is acknowledged that this specialist area of planning policy requires an understanding of strategic relationships sometimes across wide geographic areas. Cooperation is necessary with authorities where strategic relationships exist.</p> <p>Waltham Forest Council is preparing a Joint Waste Plan – the North London Waste Plan (NLWP) with the London Boroughs of Barnet, Camden, Enfield,</p>

Strategic matter	Key DtC organisations involved	Cross-boundary implications and actions taken.
Promoting Sustainable Waste Management		<p>Hackney, Haringey and Islington. Each of the seven boroughs has a strategic waste policy as part of their Local Plan. The North London Boroughs have pooled their London Plan apportionments and are meeting this need collectively through existing sites and land allocated in the NLWP. The NLWP is currently at the final stages of the examination process – consultation on proposed modifications.</p> <p>The partnership boroughs’ strategic waste policies defer to the NLWP to provide a more detailed planning framework for waste development across all boroughs. A Memorandum of Understanding is in place governing the working relationship between the North London Boroughs and to deal with cross-boundary issues.</p> <p>Planning for aggregates at the strategic level is provided by the London Plan. There is no history of gravel extraction in Waltham Forest in the recent past. As far as is known, the only materials present in the borough are gravels laid in shallow deposits across much of Leyton and South Walthamstow. They are mainly built over and their extraction is unlikely to be practical either in environmental or economic terms. Accordingly, the Waltham Forest Local Plan (LP1) makes no provision for mineral extraction or handling as there is currently no such activity in the primary sector of the economy. For the provision and supply of minerals generally, Waltham Forest relies on alternative handling facilities elsewhere in London and from other regions, including the South East and East.</p>

Paragraph 9 of Inspectors' Letter

In relation to the strategic matter of housing, what discussions have occurred with adjoining authorities about meeting any unmet housing needs, including for gypsies, travellers and travelling showpeople? Is there an agreed protocol for dealing with unmet housing needs should they arise?

Further to the detail provided in response to paragraph 7 and 8, above, the following sets out additional context to the matter of housing needs.

1. The established mechanism for the apportionment of housing requirements across London is through the development of the spatial development strategy for Greater London, with a central and coordinating role played by the Mayor as the strategic policy-making authority for London. It is for the Mayor to determine the overall level of additional housing required by the plan, which is informed by the London-wide Strategic Housing Market Assessment (SHMA) and constrained by capacity, as established in the London-wide Strategic Housing Land Availability Assessment (SHLAA).
2. The London-wide SHMA provides detail of housing needs at the London level, and does not provide assessment of needs at any smaller geography. Within London, it is accepted that there is a global housing need established by the Mayor which is apportioned to each borough according to their ability to provide housing as adduced by the SHLAA.
3. Following the recommendation of the London Plan Examination Panel to adjust the small sites target down from 245,730 to 119,250², the overall target for London which is contained in the adopted London Plan 2021 amounts to just over 52,000 homes per annum, compared to the c.65,000 proposed at examination. In light of the overall need figure for just shy of 66,000 net new homes per year outlined in the SHMA, the housing requirements set out in the London Plan 2021 fail to meet, by some margin, the established need for new homes.
4. The approach taken by the Council in setting a higher housing target for the Local Plan is proposed in order to narrow the gap between need and supply in Waltham Forest as far as possible. However, with reference to the Council's own supporting evidence in the form of the Waltham Forest SHMA (2017), the higher requirement proposed in the Local Plan does not meet the identified needs in full. As such, the Council is not in a position to be able to consider taking on unmet needs from neighbouring authorities.
5. The Mayor has a duty to inform and consult authorities in the wider South East on these matters as part of his duties under the GLA Act³, and discussions about unmet need between London and adjoining authorities are properly conducted at this

² London Plan Examination in Public: Panel Report October 2019, paragraph 173-174, available at: https://www.london.gov.uk/sites/default/files/london_plan_report_2019_final.pdf

³ Sections 335,339, and 348 of the Greater London Authority Act 1999, available at: <https://www.legislation.gov.uk/ukpga/1999/29/contents>

strategic level. As noted by the Panel at examination of the London Plan, 'it is difficult to see how the number of deliverable housing units could be increased without consideration being given to a review of the Green Belt or further exploration of potential with local authorities within the wider South East'⁴. Doing so outside of the process of producing the London Plan would risk general conformity, as the spatial strategy would not be in line with the strategic policies established in that plan.

6. The unmet housing needs of gypsies, travellers and travelling showpeople has been considered in the production of the Local Plan, informed by the production of a Gypsy and Traveller Accommodation Assessment for Waltham Forest, produced in concert with neighbouring planning authorities. There was no London-wide accommodation assessment for gypsies and travellers prepared as part of the evidence base for the London Plan 2021, however the Mayor has committed to initiating and leading this work in London to identify and meet the need for additional pitches⁵.

⁴ London Plan Examination in Public: Panel Report October 2019, paragraph 176, available at: https://www.london.gov.uk/sites/default/files/london_plan_report_2019_final.pdf

⁵ The London Plan 2021, paragraph 4.14.2, available at: https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

Paragraph 10 of Inspectors' Letter

Has a coordinated approach to the implications of growth in relation to Habitats Sites, including the Epping Forest Special Area of Conservation (SAC), been identified as a strategic matter? What engagement, if any, has taken place in this regard and when? Is there evidence to demonstrate constructive, active, and on-going cooperation or joint working?

Has a coordinated approach to the implications of growth in relation to Habitats Sites, including the Epping Forest Special Area of Conservation (SAC), been identified as a strategic matter?

1. With reference to the Council's response to Paragraph 8 of the Inspectors letter, the tables at paras 1.11 and 1.14 set out the strategic matters addressed in the LP1 Local Plan. Waltham Forest's Spatial and Growth Strategy is set out in Chapter of LP1. Policy 5 - Management of Growth sets out at section C the Council's strategic approach to the "(protection of) designated sites, areas and green space (Green Belt, Metropolitan Open Land, Special Protection Areas, Special Areas of Conservation and Sites of Special Scientific Interest; including Epping Forest SAC and SSSI and Lea Valley Regional Park SAC and RAMSAR) and conserving biodiversity including wildlife."
2. These principles are developed in Chapter 17 of LP1 to include a suite of policies intended to guide and to provide policy hooks for an SPD for the mitigation of the impact of development in relation to habitats sites with particular emphasis on the Epping Forest SAC (Policy 83).

What engagement, if any, has taken place in this regard and when? Is there evidence to demonstrate constructive, active, and on-going cooperation or joint working?

3. Following on from the details in the table at para 1.14 above, the Council is working with the Conservators of Epping Forest, Natural England and with other partners to agree a costed package of Strategic Access Management Measures (SAMMs) which will be embodied in the mitigations SPD. This is ongoing work which is captured in the Council's response to the Inspector's questions at Paragraph 6 of the inspector's letter as detailed above. In addition, this cross-boundary work is extended to discussion on the potential for cross boundary Suitable Alternative Natural Green space (SANGS). By these means the Council is working in an active and ongoing manner in coordination with neighbouring London and Essex authorities as demonstrated through the Council's responses (above) to Paragraph 7 of the Inspector's questions in the table referenced Meetings with Duty To Cooperate Partners.

Paragraph 11

To ensure that all relevant matters have been identified, would the Council summarise all Regulation 19 comments received that are relevant to the DtC, and provide the Council's response to those comments.

1. Please see table below.

DTC BODIES	REG 19 Representation Submitted	DTC Issue Raised	Council's Response
London Borough of Redbridge	YES	Concern that there have not been recent Duty to Cooperate meetings with regard to the progression of the Local Plan. We have requested a meeting with officers under separate cover.	The Council has engaged with Redbridge Officers under the Duty to Cooperate between Reg 18 and 19 of LP1 preparation stages of the plan. The Consultation Statement (KD6.1) and Duty to Cooperate Statement sets out how the Council has engaged with neighbouring boroughs on the preparation of the Plan.
London Borough of Newham	YES	No relevant DtC issue raised	
London Borough of Enfield	YES	No relevant DtC issue raised	
London Borough of Hackney	YES	No relevant DtC issue raised	
London Borough of Haringey	YES	The London Borough of Haringey adopted a new suite of Local Plan documents in July 2017. These were informed by engagement with Waltham Forest through the plan-making process. Haringey remains committed to working with Waltham Forest on strategic matters and cross-boundary issues, particularly in respect of the Tottenham Hale and Blackhorse Lane areas, where both boroughs have strategic objectives for managing growth and development.	The London Borough of Waltham Forest and the London Borough of Haringey had a meeting under the Duty to Cooperate on 14/07/2021 to finalise our Statement of Common Ground agreement. We remain committed to working with the London Borough of Haringey on cross boundary strategic issues and projects.
LLDC (London Legacy Development Corporation)	YES	No relevant DtC issue raised	

GLA (Greater London Authority)	YES	No relevant DtC issue raised	
Transport for London (TfL)	YES	No relevant DtC issue raised	
Transport for London (Commercial Development)	YES	No relevant DtC issue raised	
Essex County Council	YES	No relevant DtC issue raised	
Epping Forest District Council	YES	This Council (Epping Forest District Council) is committed to continuing to positively and actively engage with the LB Waltham Forest on these issues under the Duty to Cooperate. To this end EFDC confirms that its officers and advisors would be happy to engage with the LB Waltham Forest further not only on matters relating to recreational pressures for EFSAC but also on those relating to the atmospheric pollution pathway of impact (there is a meeting already set up of the Oversight Group for 21 January 2021 and a Cooperation for Sustainable Development Member Board on 4 March 2021). This is in recognition of the Council's very recent experience of developing approaches with Natural England to mitigate the effects of planned development (both alone and in-combination with other plans and projects) in order for it to be able to conclude that planned development within the District would not result in an adverse effect on the integrity of the EFSAC.	The London Borough of Waltham Forest will continue to positively and actively engage with Epping Forest District Council on the Cross-Boundary Strategic Issues and the matters relating to recreational pressures on Epping Forest Special Area of Conservation to mitigate the impact of planned development.

City of London (The Conservators of Epping Forest)	YES	Epping Forest Officers would welcome the opportunity to further discuss the detail of our Regulation 19 comments as part of the section 33A 'Duty to Co-operate in relation to the planning of sustainable development' duty (Planning and Compulsory Purchase Act 2001, as amended by the Localism Act 2011).	The London Borough of Waltham Forest has actively engaged with the City of London Conservators of Epping Forest in the preparation of suite of mitigation measures to reduce the impact of recreation and Air Quality Pressures on the Epping forest throughout the preparation of the Local Plan. The London Borough of Waltham Forest is committed to continued working with City of London Conservators of Epping Forest in the preparation of a joint SAMMS and SANGS Strategy to provide further relief to the adverse conditions occurring in the Epping Forest Special Area of Conservation arising from planned development.
The Lee Valley Regional Park Authority	YES	No relevant DtC issue raised	
Natural England	YES	No relevant DtC issue raised	
Sport England	YES		
Historic England	YES	No relevant DtC issue raised	
Highways England	YES	No relevant DtC issue raised	
The Canals and Rivers Trust	YES	No relevant DtC issue raised	
London Wildlife Trust	YES	No relevant DtC issue raised	
Cadent Gas	YES	No relevant DtC issue raised	
UK Power Networks (UKPN)	No	No relevant DtC issue raised	
Thames Water	YES	No relevant DtC issue raised	