

# **Redbridge Local Plan 2015-2030**

## **Duty to Cooperate Statement**

**February 2017**

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## 1. Introduction

1.1 Section 110 of the Localism Act inserted section 33A into the Planning and Compulsory Purchase Act 2004. Section 33A requires co-operation between local authorities, county councils and a range of other bodies as an integral part of the preparation of planning policy. The explanatory notes to the Localism Act state that during "...independent examination of development plan documents local authorities will have to provide evidence that they have complied with the duty (to cooperate) if their plans are not to be rejected by the examiner". The Localism Act defines strategic matters as, "sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas". The duty to cooperate requires Draft Local Planning Authorities to constructively and actively engage with relevant bodies, as part of an ongoing process, to maximise effective working on the preparation of development plan documents in relation to strategic matters.

1.2 The National Planning Policy Framework (NPPF), paragraph 178 states, "Public bodies have a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities....The Government expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities." Paragraph 178 of the NPPF states: "Public bodies have a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities set out in paragraph 156. The Government expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities. The Council's neighbouring authorities are Epping Forest, Barking and Dagenham, Havering, Newham and Waltham Forest.

1.3 The other bodies prescribed are those identified in Regulation 4 of The Town and Country Planning (Draft Local Planning) (England) Regulations 2012. The bodies prescribed under section 33A(1)(c) are:

- The Environment Agency;
- the Historic Buildings and Monuments Commission for England (known as Historic England);
- Natural England;
- the Mayor of London;
- the Civil Aviation Authority;
- the Homes and Communities Agency;
- each Primary Care Trust;
- the Office of Rail Regulation;
- Transport for London;
- each Integrated Transport Authority;
- each highway authority;
- the Marine Management Organisation.

1.4 In addition, whilst Local Enterprise Partnerships and Local Nature Partnerships are not subject to the requirements of the duty to cooperate, Local Planning authorities and the public bodies that are subject to the duty must cooperate with Local Enterprise Partnerships and Local Nature Partnerships and have regard to their activities when they are preparing their Draft Local Plans, so long as those activities are relevant to draft Local Plan making.

1.5 The duty imposed to cooperate requires, in particular, that each person, including a Local Planning authority, to:

- engage constructively, actively and on an ongoing basis in any process by means of which activities within subsection (3) are undertaken, and;
- have regard to activities of a person within subsection (9) so far as they are relevant to activities within subsection (3)<sup>1</sup>.

1.6 The duty under section 33A(2) Planning and Compulsory Purchase Act 2004 outlined above applies to the preparation of development plan documents, and activities which prepare the way for, and which support, the preparation of development plan documents, in so far as they relate to a strategic matter.

1.7 The NPPF says that in the context of plan making the duty applies to “strategic priorities” and points to the following list which is found at its paragraph 156:

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

1.8 The National Planning Practice Guidance<sup>2</sup> elaborates on the nature of the Duty to Cooperate, indicating that it ‘is not a duty to agree. But Local Planning authorities should make every effort to secure the necessary cooperation on strategic cross boundary matters before they submit their Draft Local Plans for examination’.

1.9 The submitted Redbridge Draft Local Plan is the culmination of a number of processes, activities and levels of engagement and co-operation. It reflects the views expressed and comments made during its preparation by a number of the prescribed bodies. The separate Draft Local Plan Consultation Statement sets out how these other authorities and bodies have been involved and consulted and how views have been positively taken into account in the Plan’s preparation.

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<sup>1</sup> As per Section 110(2). Section 110(3) referred to includes preparation of development plan documents and other local development document.

<sup>2</sup> Paragraph: 001 Reference ID: 9-001-20140306

1.10 This statement sets out how the relevant 'duty to co-operate' bodies have been involved in the evolution of the Plan, and how this involvement has helped shape the proposals as they emerged.

1.11 Redbridge Council considers that this statement demonstrates that the duty to cooperate requirements as set out in the Localism Act 2011 and described in the NPPF have been fulfilled and that the Council has effectively co-operated with other bodies throughout the preparation of the Plan.

## **2. Greater London Authority (GLA) and the London Plan (2015)**

2.1 Strategic planning in London is the shared responsibility of the Mayor of London, 32 London boroughs and the Corporation of the City of London. Under the legislation establishing the Greater London Authority (GLA), the Mayor has to produce a spatial development strategy (SDS), the London Plan, and to keep it under review. Boroughs Local Plans have to be 'in general conformity' with the London Plan, which is also legally part of Redbridge's Development Plan.

2.2 The National Planning Practice Guidance (NPPG) recognises that special circumstances apply in London, where "the degree of cooperation between boroughs will depend on the extent to which strategic issues have already been addressed in the London Plan". Many of the strategic issues affecting the borough and identified as being central to the Duty to Co-operate, as identified in Government policy, are addressed in the London Plan. Therefore, in London planning for strategic matters and co-operation for London largely takes place at the London-wide level, so as to inform the London Plan, and is co-ordinated by the Greater London Authority (GLA), with local plans for each individual London Borough being required to be in general conformity with the London Plan.

2.3 The London Plan (2015) sets the strategic framework for the whole of London and sets out objectives for strategic issues such as:

- the homes and jobs needed;
- the location and provision of retail and employment development;
- how growth will be supported and managed;
- the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, and energy;
- the provision of social infrastructure and other local facilities; and
- climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

2.4 In relation to Redbridge, the London Plan (2015) sets a minimum housing target (1,123 homes pa). It sets strategic objectives for town centres and industrial areas. In terms of the town centre hierarchy it designates Ilford as a Metropolitan Centre and Barkingside, Gants Hill, South Woodford and Wanstead as District centres. In terms of industrial areas it designates both Hainault Business Park and Southend Road Business Area as Strategic Employment Land. In addition it identifies growth areas with Ilford being designated as an 'Opportunity Area'. In terms of transport schemes the London Plan seeks to improve London's transport system with the implementation of Crossrail (which runs through the south of the borough) and the cycle superhighways from Ilford to Aldgate. The Council seeks to deliver these objectives of the London Plan through incorporation in the draft Local Plan and in meeting the duty to secure general conformity between the draft Local Plan and the London Plan.

2.5 Redbridge has continuously and actively engaged and worked in partnership with the Greater London Authority (GLA) throughout the development of the draft Local Plan and London Plan (2015). Key outcomes of the working have included the production of the London Strategic Housing Market Assessment (2014) and the London Strategic Housing Land Availability Assessment (2013) (see paragraphs 4.2 – 4.13 on Objectively Assessed Housing Need and Housing Land Availability) which support the draft Local Plan. This demonstrates a wider ongoing process of cooperation. In response to the findings of the SHLAA (2013), acknowledgement of the borough's limited land availability, a key outcome of cooperation, through the development of the Further Alterations of the London Plan (2015), was that the Council worked with the GLA to reduce its minimum housing provision targets for the borough. This is minimum target is included in the draft Local Plan. The draft Local Plan takes forward this work and builds on it through the development of the Outer North East London SHMA (2016) and the housing capacity estimate (set out in appendix 1 of the draft Local Plan) of the borough.

2.6 Through the consultation undertaken in 2013 and 2014, the GLA has given general support for the Council's overall development strategy for the borough. This included support for its approach to Green Belt. In particular the Mayor stated support for the Council's efforts to find new sources of housing capacity, and stated that this should be based on the principles of sustainable development and that public transport accessibility should be a key factor in determining site suitability.

2.7 However, in the 2016 regulation 19 consultation the GLA considered that the draft Local Plan was 'not in conformity with the London Plan' as it had not demonstrated 'exceptional circumstances' to amend the Green Belt boundaries. The Mayor also commented on the need to increase the affordable housing target in the borough, particularly in light of the Mayor's Affordable Housing & Viability SPG and the Mayor's manifesto commitment to achieve 50% of new homes as affordable. A key outcome is that the Council propose to modify the draft Local Plan to state that the Council's affordable housing target is a minimum and to cross refer to the Mayor's new guidance. The Mayor has supported the Council's approach to employment land in the borough, though a key outcome is the proposed modifications to clarify its position and link proposals to the Council's evidence base. The Mayor has sought for the Council to address the issues of student housing in the borough. Another key outcome of this cooperation is t is a proposed modification to LP4 to include provision for student housing.

2.8 The Mayor has asked the Council to consider an alternative development strategy. The Mayor's proposed alternative approach would seek the greater intensification on all brownfield land in the borough by increasing housing density, particularly in areas of highest transport infrastructure, such as the borough's Investment and Growth Areas. Such an approach would resist development in the borough's Green Belt. A key outcome resulting from this is that the Council has reviewed the housing capacity (including density) of all sites in appendix 1 to ensure the most effective and efficient use of land is being achieved on each site. In addition, the Council has 'tested' the Mayor's suggested development scenario to assess the implications of this approach. This is set out in the Sustainability Appraisal (2017).

### **3. Duty to Cooperate Partnerships and Groupings**

3.1 Redbridge is an active participant in regional, sub-regional and London partnerships and groups, and has done so for many years throughout the preparation of the draft Local Plan. Involvement in these have proven to be an important means of meeting the duty to cooperate, as they facilitate meaningful engagement on strategic planning issues and cross boundary matters with bodies prescribed under the duty, and other key stakeholders.

3.2 This section of the report details some of the partnerships and groupings that Redbridge's draft Local Plan has been developed through:

#### **Co-operation for Sustainable Development Group**

3.3 A Duty to Co-operate group (referred to as the 'Co-operation for Sustainable Development Group') is an officer group with the objective 'to achieve effective co-operation between Councils to support Draft Local Plan making and delivery for sustainable communities across geographical and administrative boundaries in West Essex, East Hertfordshire and the adjoining London boroughs'. The full borough / county membership of the groups include Epping Forest, Harlow and Uttlesford districts, Brentwood Borough, Chelmsford City and Essex County Council, East Herts and Broxbourne districts and Hertfordshire County Council, and the London Boroughs of Waltham Forest, Redbridge and Enfield. Redbridge first joined the group meeting on April 2014 and has continued to participate since that time.

3.4 Redbridge also form part of an associated 'Cooperation for Sustainable Development Board' which is comprised of elected Members from each represented borough (above) with the responsibility for Planning / draft Local Plans. It has two primary objectives:

- (1) the Co-operation for Sustainable Development Board will support Draft Local Plan making and delivery for sustainable communities across geographical and administrative boundaries in West Essex, East Hertfordshire and the adjoining London Boroughs. It will do this by identifying and managing spatial planning issues that impact on more than one draft Local Planning area within West Essex, East Herts and the adjoining London Boroughs;
- (2) the Board will support better integration and alignment of strategic spatial and investment priorities in West Essex, East Herts and adjoining London boroughs, ensuring that there is a clear and defined route through the statutory draft Local Planning process, where necessary.

3.5 The group, in addition to its core members (including Redbridge), has identified other key relationships, including with the Greater London Authority (observer status), the South East Local Economic Partnership, Hertfordshire LEP, Greater Cambridge and Greater Peterborough LEP, London Enterprise Panel, East Herts West Essex Border Liaison Group, and the London Stansted Cambridge Consortium.

## **Epping Forest District Council**

3.6 To the north, the borough is adjoined by Epping Forest District Council. Epping Forest District Council falls outside the Mayor of London's jurisdiction. The Council has therefore made it a priority to proactively engaged with Epping on strategic and cross boundary issues.

3.7 There are strong transport linkages between the two boroughs, with both branches of the Central Line and the M11 passing through both boroughs. In a number of locations, the urban area is contiguous between the boroughs (i.e. Woodford Wells / Buckhurst hill, Woodford Bridge / Chigwell, and Hainault / Grange Hill). The River Roding also passes through both areas.

3.8 Initial Duty to Co-operate communication between both boroughs occurred in August 2013, with EFDC writing to Redbridge seeking the identification of strategic issues. Redbridge responded indicating that the borough was experiencing significant population growth with associated demand for housing and infrastructure. Redbridge subsequently prepared a discussion paper in March 2014 identifying what the borough saw as the key strategic issues both boroughs should seek to address in a collaborative way. EFDC and Redbridge officers met separately to discuss the Redbridge paper. There was general agreement regarding the key strategic issues that needed to be addressed. In general terms it was agreed that there should: 1) be joint lobbying of TfL to increase capacity on the Central Line; 2) further information sharing, such as the potential for enhanced flood plain management; 3) agreement that new or revised SHMAs will properly consider migration patterns and consider housing supply and need in adjoining local authorities based on their emerging Local Plans; 4) ongoing discussions between Planning Officers and 5) identification of sites suitable for infrastructure serving both local authority areas. See appendix 1 for key outcomes resulting from co-operation with neighbouring boroughs. Epping has not raised any concerns regarding Redbridge's discharge of the Duty to Cooperate.

## **Neighbouring London Boroughs**

3.9 Whist no formal group or structure is in place to regularly meet on duty to cooperate matters with neighbour borough's, regular and ongoing engagement has taken place through a number of regular duty-to-cooperate stakeholder groups (in relation to the development of all neighbouring borough's draft Local Plan's) and meeting individually with borough's to engage on specific strategic and cross boundary matters. See appendix 1 for key outcomes resulting from co-operation with neighbouring boroughs. Neighbouring boroughs have not raised any concerns regarding Redbridge's discharge of the Duty to Cooperate.

## **North London Strategic Alliance / London Stansted Cambridge Corridor Consortium**

3.10 During the initial stages of preparing the draft Local Plan, Redbridge participated in the North London Strategic Alliance (NLSA) alongside its neighbouring Boroughs. NLSA comprised the London Boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington, Redbridge and Waltham Forest. Members and Senior Officers participated in NLSA and there was a dedicated secretariat. A key element of Redbridge's involvement was to focus on the delivery of major projects and strategic infrastructure within the region.

3.11 The sub-regional structure within and outside London is in a continual state of flux, particularly with the introduction of Local Enterprise Partnerships (LEPs). Much of the work previous undertaken by NLSA is now being pursued at a broader level, with the London Stansted Cambridge Corridor Consortium coming to the forefront. This is a partnership of public and private organisations covering the area north of Tech City, the City Fringe, Kings Cross, and the Olympic Park, up through the Lee Valley and M11/A10, and West Anglia Rail corridors to Harlow and Stansted, and through to Cambridge.

3.12 The partnership was formed to organise and promote what is a clear economic area, with strong inter-connections; commuting to work and learning patterns, clusters of industries and supply chains.

3.13 The area is linked by the West Anglia rail lines, as well as key road networks such as the A10 and M11. It has a population of over 2 million people and growing. It is home to strong business clusters, ranging from high-tech digital and bio-medical to logistical, resource recovery and food manufacturing.

3.14 The consortium's focus is to promote the economic development of the area, unlocking the potential of this successful but under developed area, without compromising the existing quality of life.

3.15 The growth of the area can only be fully achieved through co-operation because the drivers of growth cut across municipal borders – it spans 16 Local Authorities (including Redbridge), London and three Counties, and four LEP areas.

3.16 The importance of the LSCC is articulated in the context of the draft Local Plan. Key elements of the consortium's work with respect to Redbridge have been included in the draft Local Plan in order to support and facilitate are major transport infrastructure improvements such as Crossrail 2.

### **Community Infrastructure Delivery Group**

3.17 The Infrastructure Delivery Plan (IDP) sets out the level of additional social infrastructure required to deliver planned growth sustainably, effectively and at the right time in Redbridge. The production and compilation of the document has involved active collaboration with a range of infrastructure providers to ensure constructive engagement, secure the necessary co-operation to the mutual benefit of all stakeholders.

3.18 The following Council service areas and non-Council agencies:

- Children's Services (Redbridge)
- Adult and Community Education (Redbridge Institute of Adult Education)
- Early Education (Redbridge)
- Libraries (Redbridge)
- Environmental Services (Redbridge)
- Vision (Redbridge)
- Planning and Regeneration (Redbridge)
- Adult Social Services

- Housing
- NHS/HUDU
- Redbridge College
- Thames Water
- National Grid
- Metropolitan Police
- Transport for London
- Clinical Commissioning Group

3.19 The above stakeholders form part of the Community Infrastructure Delivery Group which developed the Council's Community Infrastructure Plan, which has been developed further into the Infrastructure Development Plan. The IDP is a 'live' document and is monitored and update regularly. Engagement is therefore on-going with the Community Infrastructure Delivery Group meeting annually to ensure infrastructure requirements are kept up-to-date. A key outcome of this group is an up-to-date Infrastructure Development Plan (2017). Proposed modifications to appendix 2 have been proposed to reflect the updates position set out in the IDP.

### **London Councils**

3.20 Redbridge is a member of "London Councils", which represents London's 32 borough Councils and the City of London. It makes the case to government, the Mayor and others to get the best deal for Londoners and to ensure that our member authorities have the resources, freedoms and powers to do the best possible job for their residents and local businesses.

3.21 London Councils works actively with boroughs to support, share good practice and lobby for new powers and resources. London Councils has worked with the Mayor to ensure that his planning powers are exercised in a way which helps support the sustainable development in London, and ensures that boroughs retain the powers and resources to help support growth in their areas. This includes representing London Borough's on Strategic Planning matters. Redbridge's interaction with London Council's is a both officer and member levels.

### **London Aggregates Working Party (LAWP)**

3.22 The Council participates in the London Aggregates Working Party (LAWP), which brings together the four London boroughs with aggregate apportionments in the London Plan (Hounslow, Hillingdon and Havering), the Greater London Authority, the Department of Communities and Local Government and representatives of the minerals industry. The role of the London Aggregates Working Party (LAWP) is to monitor the supply and demand for aggregates, rocks or building material to be used in construction. This includes assessing the reserves of primary aggregates (those obtained from mining or quarrying) and the potential supply of secondary aggregates from recycled materials. It also advises the Mayor on the inclusion of aggregate policies in the London Plan. LAWP is a key advisory body to both the Mayor and the Department for Communities and Local Government (DCLG). A key outcome of this group was the development and adoption of

the Redbridge Minerals Plan (2012). As denoted in figure 1 of the draft Local Plan, the Minerals Plan (2012), will form part of Redbridge's Development Plan. The draft Local Plan does not contain any new or amended policies in relation to minerals.

### **East London Waste Authority (ELWA)**

3.23 The East London Waste Authority (ELWA) is a Statutory Waste Disposal Authority (WDA), responsible for the disposal of waste from the London Boroughs of Barking and Dagenham, Havering, Newham and Redbridge. A key outcome of this group was the development and adoption of the East London Waste Plan (2012). As denoted in figure 1 of the draft Local Plan, the East London Waste Plan (2012), will form part of Redbridge's Development Plan. Given the adopted of the East London Waste Plan, the draft Local Plan does not contain any new or amended policies in relation to waste.

### **Association of London Borough Planning Officers (ALBPO)**

3.24 The Council actively participates in meetings of the Association of London Borough Planning Officers (ALBPO), including the 'Development Plans' group and the 'Policy Officers' Sub-group', both held bi-monthly. These bring together the 32 London boroughs for discussions of their emerging draft Local Plans and other strategic planning and policy issues. The Greater London Authority also attends each meeting, to provide an up-date on GLA / London Plan work. London Council's also attend.

### **Local Enterprise Partnership (LEP)**

3.25 In London, the Local Enterprise Partnership is the London Enterprise Panel (LEP). The LEP is the body through which the Mayor works with London's boroughs, business and Transport for London to take a strategic view of the regeneration, employment and skills agenda for London. Redbridge are a key partner on the panel.

### **London Borough Group Viability**

3.26 The London Borough Viability Group was formed in 2014 in response to the increasing emphasis placed on development viability in the planning process. The Group draws together planning, housing and surveying officers from councils across London to consider best practice in the assessment of viability. The group consulted on a draft London Borough Viability Protocol between 22 February and 20 March 2016 and this has now been published. A key outcome in relation to the draft Local Plan was to imbed the Viability Protocol into the implementation section of the plan (paragraph 7.2.15 and 7.2.16).

#### **4. Strategic Cross Boundary Matters and cooperation with prescribed bodies**

4.1 Paragraph 156 of the NPPF sets out the strategic priorities which the Council should deliver. These include:

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

As set out in paragraph 2.3 above, the Council considers that a number of these issues are address at a strategic level through the London Plan (2015). However, the Council considers that the following matters are not specifically dealt with by the London Plan but are still strategic issues cross boundary issues which the draft Local Plan seeks to address:

- Meeting the Borough’s Objectively Assess Housing Need;
- Housing Land Availability;
- Gypsies and Travellers;
- Heritage;
- Health provision;
- Education provision;
- Green Belt, Open Space and Recreation provision;
- Biodiversity and Nature Conservation;
- Local Transport; and
- Flood management.

This section focuses on each individual strategic issue and explains how it has sought to cooperate with prescribed bodies and other key stakeholders through the development of the draft Local Plan.

#### **Meeting the Borough’s Objectively Assessed Housing Need**

4.2 The Duty to Cooperate requires active, on-going and constructive engagement between local authorities and other groups, on cross-boundary issues including housing provision; this is especially important between local authorities that share a Housing Market Area.

4.3 The Council has worked actively and constructively with neighbouring boroughs to address the issue of housing need in the east London sub region. The National Planning Policy Framework (NPPF) contains a presumption in favour of sustainable development, and states that draft Local Plans should meet the full, objectively assessed needs for market and affordable housing in the housing market area. Redbridge is part of the wider London Housing Market Area.

4.4 In terms of housing, the London Plan sets a housing target of 1,123 homes per year (16,845 over the plan period) for the London Borough of Redbridge. The SHLAA identifies most of the existing capacity and, effectively, through the SHLAA, the FALP has determined the extent to which individual Boroughs can contribute to meeting the strategic need for housing across London and has apportioned of the overall strategic needs between London Boroughs, having regard to the capacity available within each. As noted in paragraph 20 of the Inspector's report on the FLAP, "within the confines of the FALP's strategy there is little scope to do more". In respect to individual London boroughs, the Inspector noted that "given that the minimum targets in Table 3.1 are based on the SHLAA's estimate of capacity in each Borough, it is difficult to see how co-operation between them will increase supply."

4.5 In terms of meeting housing need, the Inspector concluded (in paragraph 20) that, "the Mayor's estimate of objectively assessed housing need in London is justified by the evidence submitted to the EiP. Further, although I have reservations, I also consider that the FALP's strategy with regard to supply and distribution can be supported in the short term". Further he states, "the evidence before me strongly suggests that the existing London Plan strategy will not deliver sufficient homes to meet objectively assessed need. In the Inspector's view, "the Mayor needs to explore options beyond the existing philosophy of the London Plan."

4.6 In the Examining Inspectors Report on the Further Alterations to the London Plan within the two tier system which exists in London, it was made clear that, in the light of the housing requirements provided to the individual boroughs by the FALP and the strategy and approach which underlies it, it was unnecessary for each borough to make its own objective assessment of housing need. However, matters were made unclear by the requirements in London Plan policy 3.3, which continues to have effect, and which indicates that Local Planning authorities should seek to meet the minimum housing and also seek to 'close the gap' between identified housing need and supply. In addition Mayor's Draft Interim Housing Supplementary Planning Guidance sets out the way in which the Mayor expects boroughs to produce Strategic Housing Market Assessments (SHMAs).

4.7 In order to address this issue the Council has sought to actively, constructively and collaboratively work with neighbouring authorities. A key outcome was the joint commissioning of the Outer North East London Strategic Housing Market Needs Assessment (2016). The neighbouring boroughs of Barking and Dagenham, Havering, Newham formed part of the original commission. The London Borough of Waltham Forest were not part of the original commissioning group, but given the identified housing markets in the study area, Waltham Forest were included to ensure that every effort was made to secure the necessary cooperation. The objective of the SHMA study was to give the Outer North East London authorities an up-to-date, robust, objectively assessed and evidence based assessment of development needs for housing (both market and affordable) and to ensure that this was compliant with the requirements of the National Planning Policy Framework and Guidance, as well as the Mayor's methodology. The SHMA helps to ensure consistency of approach and a common understanding of local authority need and housing market area needs across the sub-region. This in turn has helped the respective local authorities prepare draft Local Plans based on robust evidence in respect of objectively assessed housing need. In order to manage the process a working group of planning and housing officers from each borough met on a regular basis to progress the

development of the SHMA. The GLA provided peer review input as well as London-wide guidance on the preparation of SHMA in the context of the London Plan / GLA SHMA work. The final SHMA was agreed and finalised by the group in May 2016.

4.8 In regards to the findings of the SHMA the Council acknowledges that it will not be able to meet its own OAN. The neighbouring borough of Havering raised particular concerns regarding how Redbridge's unmet OAN would be addressed in the sub regional market area. The Council sought to engage Barking and Dagenham and Havering (both in the housing market area) to address and clarify the position.

4.9 In order to achieve this, a key outcome was that the above Boroughs sought the GLA's view on how Redbridge's unmet housing need should be addressed. The GLA have clarified that London should be treated as a single housing market. In order to meet local need and contribute to meeting strategic need each London borough should seek to exceed its minimum housing target by measures set out in London Plan Policy 3.3E, paragraphs 3.19 and 3.19i of the Plan and Section 1 of the Housing SPG. In preparing the draft Local Plan, borough's will be expected to demonstrate that it has sought to increase its housing supply in line with policy 3.3 of the London Plan and the Housing SPG 2016 in order to reduce the gap between local and strategic housing need and supply. The GLA noted that additional sources of housing across London from higher density development, housing in Opportunity and Intensification Areas, town centres, surplus industrial land and other large sites could close the gap between the minimum housing supply target and London's identified need. There is therefore no requirement for neighbouring authorities to accommodate surplus housing need from adjoining boroughs. The Council's approach of seeking to meet and exceed its London Plan minimum target whilst also seeking to 'close the gap' on OAN is supported and mutually agreed by the GLA and neighbouring borough.

4.10 The issue of how sub regional housing need will be accommodated will be ongoing given neighbouring boroughs are in the process of developing their own draft Local Plans and the Mayor is developing a new London Plan. The Council will continue to actively engage with neighbouring authorities and the GLA on this issue through appropriate channels in the development of respective emerging Draft Local Plans and London Plan.

### **Housing Land Availability**

4.11 Redbridge collaborated with the GLA to produce the London Strategic Housing Land Availability Assessment (SHLAA) 2013. This document informed Further Alterations to the London Plan (FALP) and the consolidated London Plan 2015, which set borough's individual minimum housing targets for each London Borough. The GLA was responsible for customising the database and software that the boroughs use to assess large sites (> 0.25 ha), issuing the initial set of sites (or polygons) proposed for assessment, setting strict parameters to ensure that the assessment options are the same for each authority. The GLA was also responsible for collating data on small sites, vacant homes and student housing and drafting the report of the SHLAA findings. The local authorities' main task was to assess the large sites proposed for their area, determine whether to exclude sites/ assign probability of sites coming forward on the basis of any constraints, and estimate the housing capacity of the site, all in accordance with the strict parameters set by the GLA. The collaboration of all London planning authorities on a single London SHLAA in this constructive process removes the need for each authority to prepare an individual

SHLAA for its own area. This process has ensured mutual agreement on the minimum housing target as set out in the London Plan (2015).

4.12 However, as outlined in the Mayor's representation during the Reg 19 consultation the Mayor has asked the Council to reconsider its approach to densities by increasing them particularly on brownfield land. In order to address this, the Council has reviewed the housing capacity of all identified Opportunity Sites (on brownfield) in appendix 1. This has been undertaken in accordance with the SHLAA 2013 methodology. As a result of this work, the Council has proposed modifications to appendix 1.

4.13 Constructive discussions in relation housing land availability will be ongoing, particularly with the GLA through updating the Mayor's SHLAA (2016) which will inform the developing London Plan.

### **Gypsies and Travellers Provision**

4.14 Local planning authorities should co-operate with other local authorities along with travellers, representative bodies, support groups and other interest groups to prepare and maintain an up-to-date understanding of accommodation needs. Specifically, local planning authorities should set pitch targets for gypsies and travellers and plot targets for travelling showpeople in order to address their accommodation needs, working collaboratively with neighbouring local planning authorities.

4.15 During preparation of the London Plan 2011, the GLA agreed that local planning authorities should be wholly responsible for assessing accommodation needs of travellers and planning to meet those needs. The London Plan does not set any strategic requirements but indicates in Policy 3.8 that boroughs should ensure that the accommodation requirements of gypsies and travellers are identified and addressed, with sites identified in coordination with neighbouring boroughs and districts as appropriate. Guidance on how to plan for the accommodation needs for Gypsies and Travellers is set out in the Government's 'Planning Policy for Traveller Sites (2015)'. A key outcome of this was the commissioning of ORS to undertake a Gypsy and Traveller Accommodation Assessment (2016) to inform the draft Local Plan.

4.16 During the production of this document ORS contacted all adjoining local authorities (Waltham Forest, Barking and Dagenham, Havering, Newham and Epping Forest), to ensure there was the necessary cooperation, with a set of specific questions relating to their traveller accommodation needs, their plans to meet those needs, and any spare capacity that they may have to accommodate future growth. The purpose of this final exercise was to ensure that the Council has up-to-date and fully recorded details of each authority's position.

4.17 The Assessment concluded that seven additional pitches will be required over the plan period. Whilst there would be a small increase in the level of need in Redbridge over the plan period, this could be accommodated on the existing authorised site in the borough (Northview Caravan Site, Forest Road). The Council does not need assistance from neighbouring boroughs to accommodate its projected provision.

4.18 However, Newham, Havering and Epping Forest have also undertaken similar assessments of need which Redbridge have collaborated with and informed. In the case of Epping they do not consider they have the capacity to meet the need arising within their borough. Redbridge has indicated that it is not in a position to accommodate any of the additional needs arising from Epping. Given the limited land availability in the borough and significant development needs within Redbridge itself, the borough cannot identify a site(s) for Gypsies and Travellers to assist in accommodating neighbouring boroughs needs other than through relocation of sites in the draft Local Plan currently allocated for residential and other development or by releasing further land from the Green Belt.

4.19 The issue of how the needs of Gypsies and Travellers will be accommodated will be ongoing given neighbouring boroughs are in the process of developing their own Local Plans. The Council will continue to actively engage with neighbouring authorities and the GLA on this issue through appropriate channels.

4.20 Key outcome of this work, and in particular the cooperation with neighbouring Boroughs in the process of assessment of the Borough's needs for gypsy and traveller site provision, are revised wording to policy LP8 - Gypsy and Travellers which include the setting of an updated pitch target and definitions.

## **Heritage**

4.21 Historic England has been engaged with the development of the draft Local Plan from the outset. Historic England has generally been supportive of the proposals in the draft Local Plan, however, through their representations they have sought that the Council re-enforce its understanding of the value of its heritage assets and to seek to enhance these rather than simply protected them. In response to this, a key outcome has been the collaborative working with Historic England on the preparation and development of the Redbridge Characterisation Study (2014). Historic England was an active stakeholder on the working group that lead on the preparation of this document and has provided positive input and feedback on the document produced. This Characterisation Study (2014) has been a key piece of evidence which has informed the Council's overall strategy, particularly on heritage. Key outcomes to the draft Local Plan include amplifying 'local distinctiveness' and the unique and special areas of character in the borough in LP33 and supporting text.

4.22 In relation to area/site specific matters, further constructive engagement with Historic England has sought to address specific concerns raised with regards to the impact of development due to identifiable potential threats to heritage assets in relation to intensification of the 'Wanstead to Woodford Corridor' (option 3 in the PORE) and development of the King George and Goodmayes hospital Site(s) and the potential impact this would have on the preservation and enhancement of a number of Listed Buildings. In response the Council has made specific references in relation to protection and enhancement of the listed buildings at King Georges and Goodmayes sites in LP1B. These considerations have been incorporated into the indicative masterplans for the site.

4.23 In addition, the Council have proposed a number of modifications as a result of engagement through the regulation 19 consultation. These include recognition that growth ambitions should be reconciled with Local Plan objectives for respecting and enhancing the borough's heritage, amending Strategic Objectives to better reflect the

Council's approach and obligations on heritage assets in the borough, making designations of special character clearer on the Policies Map and the supporting text including a list of heritage at risk in Redbridge.

4.24 The Council has worked collaboratively and constructively with Historic England and the Greater London Archaeological Advisory Service (GLAAS) to undertake a comprehensive review of the Archaeological Priority Areas in the borough. Oxford Archaeology undertook Archaeological Priority Areas Appraisal. A key outcome of this work was the completion of the document in April 2016. The draft Local Plan incorporated the findings of this report in LP33 and updated Archaeological Priority Zones have been included on the Council's policies map.

## **Health Provision**

4.25 Redbridge has had ongoing engagement with the Redbridge PCT and its successors, including the newly created internal Public Health Team and the newly created Clinical Commissioning Group (CCG) as well as North East London NHS Foundation Trust and Barking, Havering and Redbridge (University Hospitals) NHS Trust (particularly those relating to the NHS estate).

4.26 The Council has engaged health providers throughout the development of the draft Local Plan (also see paragraph 3.17 – 3.19 above). Responding to the consultation in 2013, Redbridge PCT and the NHS London Healthy Urban Development Unit (HUDU), noted that the Local Plan needed to integrate health throughout the document in order to promote healthy lifestyles, not just clinic health infrastructure. Key outcomes of this have included the Council including a strategic objective into the draft Local Plan aimed at improving health and wellbeing. In addition, new planning policies specifically to address issues of health and wellbeing have been included such as LP18 – Health and Wellbeing), LP11 – Managing the Clustering of Town Centres – which seeks to manage the proliferation of Hot Food Takeaways and LP22 – Promoting Sustainable Transport which seeks to encourage an 'active environment'.

4.27 At the time of Regulation 19 Consultation, the CCG were in the process of drafting their Primary Care Infrastructure Capacity Plan – a document that outlines additional primary care infrastructure requirements needed to meet population growth in Redbridge to 2030. Whilst this work was at an early stage, initial drafts were used as a basis for responding to the Regulation 19 Consultation on the Local Plan.

4.28 Since this time, the Council and the CCG have engaged in ongoing and continuous dialogue to better understand the implications of growth projected through the Local Plan on existing and planned future primary healthcare provision. Further progress on the Primary Care Infrastructure Capacity Plan has also meant that a stronger understanding of the role and function of the existing primary care estate now exists.

4.29 The CCG's Primary Care Infrastructure Plan concludes that the nature of the existing estate (much of it in converted domestic premises), along with existing patient to GP ratios, indicates limited scope for greater utilisation of the existing estate through matters such as refurbishment, physical extensions, and extended opening hours. As such, some new healthcare facilities will need to be provided alongside investment in those areas of the existing estate that does offer scope for greater utilisation.

4.30 Areas where investment in new or reconfigured healthcare facilities will be required correlates strongly with areas where population growth is expected to be highest; since this will place increased pressure on existing services. Across the borough, key requirements over the Local Plan period can be broken down as follows:

- Cranbrook and Loxford – investment in Loxford Polyclinic to enable better utilisation in the early phases of the plan, and provision of a new health hub as part of developments proposed in Ilford town centre;
- Seven Kings – investment into some reconfiguration of Newbury Park Health Centre, provision of a new health centre at Goodmayes, and a new health hub as part of the proposed redevelopment at King George and Goodmayes Hospitals;
- Fairlop – investment in some reconfiguration of Hainault Health Hub, and redevelopment and modernisation of Fullwell Cross Health Centre or provision of a new Locality Hub as part of the proposed Oakfield redevelopment;
- Wanstead and Woodford – redevelopment of Wanstead Hospital as a new locality hub and key worker accommodation, and investment in South Woodford Health Centre to increase capacity.

4.31 Key outcomes in relation to this cooperation relate to updates to appendix 2.

4.32 The Council is continuing to working with the CCG and Department of Health to produce a Sustainable Transformation Plan (STP) which covers all health requirements for the next 5 years across North East London. This is being informed by four emerging local transformation strategies across BHR for primary care, planned care, unplanned care and mental health being jointly designed by CCG and Local Authority commissioners. The development of this document is ongoing.

4.33 The NHS has been involved in ongoing discussions in relation to the strategic sites of King George and Goodmayes Hospital sites with respect to bringing these sites forward for development.

### **Education Provision**

4.34 The Council has worked collaboratively with the Council's Education Department and Education Funding Agency to plan for education provision in the borough to meet the Local Plan's projected growth.

4.35 The Council agreed at its Cabinet meeting in October 2015 a number of expansions of existing schools to meet projected demand for reception and primary aged pupils for academic years 2015/16 to 2021/22. The Cabinet agreed additional primary places be created both on a temporary and a permanent basis to address the projected deficits. These permanent expansions are focused on the South and Central area of the borough aligned with the areas of highest proposed growth identified in the Local Plan (Ilford and Crossrail Corridor).

4.36 The draft Local Plan therefore sets out a framework for the delivery of schools to meet demand arising from the growth in housing projected in the plan. There are three elements to this approach as illustrated below:

1. Identification of school sites on the four proposed Green Belt sites;
2. Major comprehensive mixed use development of strategic sites; and
3. Supportive policy framework for school expansion and intensification

4.37 The Council have continued to work with colleagues in its education department and Education Funding Agency (EFA) to establish the future school place requirements, sources of funding/delivery/phasing and potential school sites. This work has informed the IDP (2017). A key outcome is that the Council has proposed modifications to Appendix 2 to reflect the updated position.

### **Green Belt, Open Space and Recreation**

4.38 The Council are proposing to release parcels of green belt in order to meet the borough's development needs. The proposed release of the parcel of existing Green Belt named Billet Road to be designated as an Opportunity Site is of most significance to strategic or cross boundary issues. This site is located on the eastern borough boundary and directly adjoins the neighbouring borough of Barking and Dagenham. The urban settlement to the immediate east which adjoins the Billet Road site is Marks Gate (which is located within Barking and Dagenham). The Council has discussed the allocation of this site with officers at Barking and Dagenham and they are in general support of the allocation. Marks Gate has been identified by Barking and Dagenham as an area in need of regeneration and housing renewal. A Key outcome of discussions highlighted the potential benefits and investment opportunities (such as new housing and social infrastructure) that redevelopment of the Billet Road site could bring to the wider area and the 'links' that could be made between the proposals at Billet Road site and the regeneration plans that Barking and Dagenham have for the Marks Gate area. The development of the detail of these proposals will be ongoing and it was agreed that future collaborative working between boroughs and other key stakeholders should take place to facilitate proposals at both Billet Road site and the wider Marks Gate area, particularly through the masterplanning work proposed in policy LP1B to ensure mutual benefit of proposals to the wider area.

4.39 Redbridge is not the only authority which has undertaken a Green Belt Review. The borough has been involved, through stakeholder groups, with work undertaken by both Waltham Forest and Epping District Council to date in the development and production of respective Green Belt Reviews. While Waltham Forest is not currently proposing to release Green Belt, Epping Forest is (as stated in their recent Regulation 18 consultation). None of the proposed parcels of Green Belt proposed for release adjoin Redbridge and therefore the Council have no concerns in relation to strategic or cross boundary issues concerning the impact of Green Belt release. Further engagement on Green Belt matters in the sub region will be ongoing as Havering are in the process of reviewing its Green Belt and the Council will actively engage with them during this process.

4.40 Sport England responded to the PORE extension consultation advising the Council they needed to develop a Playing Pitch Strategy (PPS) to assess the current and future playing pitch provision to 2030. A key outcome that that the Council agreed and set up the Playing Pitches Strategy Steering Group to ensure the necessary cooperation and to

actively and collaboratively develop the document and Action Plan. The Steering Group consists of the four main national governing sports bodies of the Football Association, the Rugby Football Union, the English Cricket Board and England Hockey and also included Sport England, London Sport, Vision Redbridge, Redbridge Sports Development Officer and the Council's planning department. The document was developed in line with Sport England's Playing Pitch Guidance (2013). Included in the PPS is an Action Plan which sets out a strategy to protect, enhance and provide sports pitch provision in the borough. The Redbridge PPS was agreed by all members and adopted by the Council in May 2016. Constructive engagement with the group is ongoing given the PPS and Action Plan will continue to be monitored and reviewed through this group.

4.41 In response to Sport England representation on the submission draft Local Plan and in order to address a key action of the PPS Action Plan the Council has undertaken detailed feasibility work to set out proposals for the relocation for existing sports pitches and facilities in the borough. The feasibility studies in relation to proposals for the relocation of sports pitches and facilities have been presented to the PPS Steering group for comment and feedback. This feasibility work has been included in the evidence base. In Sport England's representation they propose a number of alterations to the draft Local Plan. A key outcome is the proposed modifications to policies LP1B, LP1E, LP35 and additional text to paragraph 4.17.1.

4.42 The Open Space Study that supports the draft Local Plan has been prepared in liaison with neighbouring boroughs to ensure the necessary cooperation and to understand their future plans for open space provision, likely movement of residents between boroughs to use nearby open spaces, and to establish if there were any provision issues that required cross boundary partnership working. Whilst this did not identify any specific open space projects to work jointly with neighbouring boroughs on, it did highlight that some existing open spaces within the borough (e.g. Wanstead Flats, Wanstead Park, and the River Roding) are of value to residents beyond the borough boundary. Further ongoing work is set out in the document as the Open Space Assessment promotes that the Council should work with the City of London (who manage Corporation of London land) and explore options for the installation of appropriate play spaces within City of London open space sites. The Council will progress these discussions through the appropriate channels.

### **Nature Conservation and Biodiversity**

4.43 The Council has collaborated with Natural England on many aspects of work involved with the development of the draft Local Plan. This has included involvement on work relating to the Sustainability Appraisal (2017) the Habitats Regulations Assessment (2017) as well as amendments to the draft Local Plan itself. Engagement has taken the form of informal discussions about sites and their potential impacts on local sites of nature conservation value and those beyond the borough's boundaries, along with formal consultations on the draft Local Plan and related documentation.

4.44 A key outcome is that Natural England was actively involved in scoping the Sustainability Appraisal to ensure mutual agreement on the process. Natural England has therefore supported the approach taken in the Sustainability Appraisal.

4.45 Another key outcome includes engagement with Natural England throughout the preparation for the Borough's Habitat Regulations Assessment (HRA). The HRA uses the

most up-to-date information on the borough's European Sites provided by Natural England. Natural England inputted into the final HRA report which determined that the policies and proposals in the draft Local Plan have 'no likely significant effect' on the borough's sites.

4.46 In response to engagement with Natural England, the Council has included text in LP 39 on the benefits of the natural environment in terms of wildlife, health, recreation and quality of life.

4.47 In London, the Local Nature Partnership is the GLA. The Mayor of London has prepared the ALGG supplementary planning guidance. This SPG promotes the linking of places in London with high quality open space. A key outcome is to ensure that objectives of the SPG, and the ambitions of the ALGG, are reflected in the draft Local Plan which seeks to link areas such as Fairlop Waters Country Park, Hainault Forest Country, the Roding Valley and Epping Forest.

### **Managing Flood Risk**

4.48 The Council works closely with the Environment Agency throughout the development of the draft Local Plan. The Environment Agency has engaged at every stage of statutory consultation stage. In addition, informal discussions with the EA about hydrological and biodiversity issues, flood risk, water supply and waste water disposal in relation to development sites and transport and recreation proposals have taken place.

4.49 Initial engagement with the Environment Agency identified a number of opportunities to incorporate evidence base work into the emerging policies. These included the Drain London Surface Water Management Plan, areas for flood water storage and river restoration and mitigation measures identified in the Thames River Basin Management Plan. A key outcome is to ensure these documents have been included in the borough's evidence base and have underpinned formulation development of planning policies in relation to Green Infrastructure and the Blue Ribbon Network.

4.50 In response to representations received during the Preferred Options extension consultation (2014), a key outcome was working constructively and collaboratively with EA to update its Level 1 and Level 2 Strategic Flood Risk Assessment (SFRA). Specific changes include reference the EAs recently published new guidance on how climate change could affect flood risk to new development in 'Flood risk assessments: climate change allowances' and released and updated Thames River Basin Management Plan (RBMP). The EA where actively involved in the updating of the SRFAs were prepared in close conjunction with the Environment Agency (planning and technical specialists) whom attended working group meetings throughout the process and also providing formal written feedback on the draft document and mapping. The recommendations of the SFRA were mutually agreed in conjunction with the Environment Agency and have informed the preparation of policies especially LP21.

4.51 Most recently, the Council has worked actively with the Environment Agency in demonstrating that sites put forward for development outside of Flood Zone 1 meet the Sequential and Exception Test where necessary. A key outcome is a series of modifications to the Pre-Submission Plan have also been agreed in response to detailed comments raised in response to Regulation 19 consultation, and subsequent collaborative working.

4.52 In addition, the council has also collaborated with the Environment Agency through its participation in the Drain London forum, which has produced a surface water management evidence base (including the Surface Water Management Plan) that underpins the draft Local Plan.

4.53 The Marine Management Organisation (MMO) is the marine planning authority for England. The MMO is responsible to marine plans, including the forthcoming 'South East inshore' plan which will cover the tidal Thames, including Redbridge (a small part of the southern section of the River Roding within Redbridge is tidal). Whilst the MMO have been formally consulted at all stages of plan production, no substantive issues have been raised.

## **Transport Issues**

4.54 The Council is currently actively working with TfL and Network Rail on the implementation of strategic transport infrastructure. Specifically this relates to the implementation of Crossrail which is scheduled to be in operation by 2018. Ongoing collaborative work will continue, facilitated by proposals in the draft Local Plan, particularly in relation to the implementation of Crossrail in the borough and improvements to the Crossrail Stations at Ilford, Seven Kings, Goodmayes and Chadwell Heath. The Cross Rail Inter Borough meeting is a forum which aims to progress the implementation of Cross Rail.

4.55 The Council has a close working relationship with Transport for London on matters of strategic transport infrastructure. Redbridge, like all London boroughs, is required to develop its transport network to support the Mayor of London in achieving his transport objectives as set out in the London Plan (2015) and Mayor's Transport Strategy (2010).

4.56 A key component of seeking to achieve the Mayor's strategic transport objectives is the development of the Redbridge Local Implementation Plan (2011 – 2030) (LIP). The Council actively and collaboratively worked with TfL in the development of this document. A key outcome is the formal adoption of the LIP in January 2011, after being agreed with Transport or London. This document has been included in the evidence base and spatially expressed in the draft Local Plan.

4.57 TfL has engaged with the Council throughout the development of the draft Local Plan. It has provided constructive feedback during all statutory consultations. TfL's support the Council's proposed strategy of locating new development and growth in areas with good existing public transport accessibility. Specifically TfL supported the proposed use of minimum car parking standards, provided these were in conjunction with the maximum standards in the London Plan; this approach were taken forward into the draft Local Plan. In addition, the Council have proposed a range of detailed modifications, which respond to detailed feedback from TfL during Regulation 19 Consultation. A key outcome includes the designation of these sites as Development Opportunity Sites in Appendix 1.

4.58 The borough also works in partnership with TfL (and other stakeholders) through a number of regular forums, particularly to promote sustainable forms of transport. Specifically, the Redbridge Bus Network and Priority Development meeting which seek to assess and address demands on the existing and future bus network and the Redbridge Cycling Forum which seeks to promote cycling in the borough and support related

initiatives. A key outcome of these discussions is the incorporation of policies LP22 – Promoting Sustainable Transport and LP23 – Cycle and Car Parking.

4.59 Another key outcome of this engagement with TfL is the commissioning of a borough wide transport assessment. This seeks to assess the impact of planned growth on the strategic and local road network and key junctions. The report has highlighted the need for investment in key junctions. These have been included in appendix 2.

4.60 A cross-boundary issue is the capacity of the Central line. This is a concern for neighbouring boroughs Epping Forest and Waltham Forest. In order to address this a key outcome is the recent setting up of a cross borough forum with the aim of helping to inform and plan for sustainable growth along the eastern section of the Central Line from Stratford to Epping including the Hainault Loop and provide a forum to review investment and service improvement. This consists of borough officer from Epping Forest, Waltham Forest, Redbridge and TfL planning, transport and regeneration departments. The forum will look to enable growth opportunities close to Central Line stations, advise member authorities, the GLA and TfL about progress of local plans and monitor investment and service improvements in the line. Ongoing cooperation will take place via this forum.

4.61 The Highways Agency has engaged the Council throughout the development of the draft Local Plan at each of the statutory stages of consultation. The Highways Agency noted that any impact on the strategic road network within or in the vicinity of Redbridge (i.e. the M11 / M25) arising from new development would need to be mitigated (i.e. manage down demand and reduce the need to travel). A key outcome is the inclusion of policy LP22 which seeks to promote sustainable forms of transport to mitigate impacts.

4.62 The Council has actively engaged with the Civil Aviation Authority (CAA) as well as individual airports on aviation matters for a number of years. This is predominately due to resident concerns regarding aircraft noise from London City (proposed expansion) and Heathrow Airports, particularly as a result of changes to flight paths. This issue was also raised by residents in the west of the borough during consultation on the Draft Local Plan (particularly the Preferred Options Report Extension, specifically Option 3 – Western Corridor). The CAA wrote to the Council at the Preferred Options Report stage of the draft Local Plan process, indicating that the Council did not need to consult with them on the preparation of the draft Local Plan.

4.63 Redbridge has not engaged directly with the Office of Rail Regulation when preparing the Draft Local Plan, as strategic planning considerations are considered best discussed with other bodies involved in strategic transport planning. In this context, the council has liaised with Network Rail and train operating companies that serve the borough, primarily in the development of its Local Implementation Plan 2011-2031 and other evidence base documents.

## **Sustainability Appraisal**

4.64 The planning Regulations require that “When deciding on the scope and level of detail of the information that must be included in the Environmental Report (i.e. the SA scope), the responsible authority shall consult the consultation bodies”. In England, in accordance with Article 6(3) of the SEA Directive, the consultation bodies are Natural England, the Environment Agency and Historic England. As such, these authorities were consulted on the SA scope in 2013.

## **5. Conclusion**

5.1 It is the Council's view that it has met its duty to cooperate in accordance with the Localism Act (2011) and NPPF with proactive and continuous engagement with neighbouring authorities, prescribed bodies and other key stakeholders throughout the development of the Draft Local Plan.

5.2 The Council recognise the important role the Mayor's London Plan and Transport Strategy (2010) plays in addressing strategic and cross boundary matters affecting London and the eastern sub region where Redbridge is located.

5.3 The Council has proactively engaged with neighbouring authorities, prescribed bodies and other key stakeholders at all stages of consultation through a range of stakeholder groups and forums.

5.4 This statement has set out the key strategic cross boundary issues, how the Council has engaged and set out key outcomes which have resulted from cooperation.

5.5 The Council will continue to work closely with the neighbouring boroughs, prescribed bodies and other key stakeholders to promote the growth and regeneration of the borough and the wider sub region.





LPA / Grouping	Summary of Cross Boundary/Strategic Issues	Outcomes of Cooperation
		Storage Area – Working in partnership with EA, Thames Water and adjoining boroughs on implementing the Roding Strategy to minimise impact of flooding of the River Roding.
Havering	<ul style="list-style-type: none"> <li data-bbox="379 533 794 566">▪ Spatial Development Strategy</li> <li data-bbox="379 633 951 701">▪ Meeting Objectively Assessed Housing Need</li> <li data-bbox="379 1059 847 1093">▪ Green Belt Review / Evidence Base</li> <li data-bbox="379 1821 906 1854">▪ Strategic Development Site Allocations</li> <li data-bbox="379 1888 834 1921">▪ Strategic Transport Infrastructure</li> </ul>	<p data-bbox="975 533 1406 600">General support for Redbridge's overall growth strategy.</p> <p data-bbox="975 633 1406 1025">Havering is in the same Housing Market Area as Redbridge. Redbridge has prepared an Outer North East London SHMA with the neighbouring boroughs including Havering. Whilst Havering state that they should be able to meet their ONA within their boundary, Redbridge will not be unable to. Clarification was sought from the GLA with regards to unmet housing need in the sub region.</p> <p data-bbox="975 1059 1406 1787">Both authorities are in the process of or had undertaken a Green Belt Review. General agreement on methodology used to undertake Green Belt Review. The findings of the Havering Green Belt review were not available at the time of writing. It was noted that there are no anticipated changes to any Green Belt on adjoining or parcels which cross borough boundaries. However, there was general support for proposed areas of Green Belt 'release' in Redbridge. Whilst not directly adjoining Havering, specific discussion on release of Billet Road, a large site on the eastern boundary and allocation as housing led mixed use 'Opportunity Site'. Support of education provision as part of redevelopment proposals.</p> <p data-bbox="975 1821 1265 1854">As above re Billet Road.</p> <p data-bbox="975 1888 1406 1989">General support and borough cooperation to ensure the implementation for Crossrail.</p>

LPA / Grouping	Summary of Cross Boundary/Strategic Issues	Outcomes of Cooperation
	<ul style="list-style-type: none"> <li>▪ Gypsies and Travellers Need</li> </ul>	<p>Both Havering and Redbridge have undertaken revised Gypsies and Travellers Needs Assessments to get an up-to-date understanding. Havering's level of needs was not available at time of writing and no indication was given as to if need could be met within their boundary. However, Redbridge considers that they can meet their own level of need within their boundary.</p>
Newham	<ul style="list-style-type: none"> <li>▪ Spatial Development Strategy</li> <li>▪ Meeting Objectively Assessed Housing Need</li> <li>▪ Green Belt Review / Evidence Base</li> <li>▪ Strategic Development Site Allocations</li> <li>▪ Houses in Multiple Occupation/Private Rented Sector</li> </ul>	<p>General support for Redbridge's overall growth strategy.</p> <p>Newham is in the same Housing Market Area as Redbridge. Redbridge has prepared an Outer North East London SHMA with the neighbouring boroughs including Newham. The SHMA helps to ensure consistency of approach and a common understanding of local authority need and housing market area needs across the sub-region. Whilst Newham state that they should be able to meet their ONA within their boundary, Redbridge will be unable.</p> <p>General support for proposed areas of Green Belt 'release. It was noted that there are no changes to any Green Belt on adjoining or which cross borough boundaries.</p> <p>No issues raised in relation to strategic site allocations. Potential future working on improvements to Wanstead Flats, should this progress.</p> <p>Newham advised that there is a licensing scheme in place for all private sector landlords and an Article 4 Direction removing permitted development rights for smaller HMOs. This may have</p>

LPA / Grouping	Summary of Cross Boundary/Strategic Issues	Outcomes of Cooperation
	<ul style="list-style-type: none"> <li data-bbox="379 551 735 577">▪ Student Accommodation</li> <li data-bbox="379 853 767 880">▪ Gypsies and Travellers Need</li> <li data-bbox="379 1211 815 1238">▪ Town Centres and Retail Impact</li> <li data-bbox="379 1514 831 1541">▪ Strategic Transport Infrastructure</li> <li data-bbox="379 1872 699 1899">▪ City Airport Expansion</li> </ul>	<p data-bbox="975 286 1407 517">implications for Redbridge in terms of the displacement of HMOs/ rogue landlords moving into the borough. The Council has included a specific policy in the Local Plan (LP6) to manage (where possible) such uses.</p> <p data-bbox="975 551 1407 808">Newham advised there have been several applications for student accommodation on sites which had been allocated for housing. The Council noted that this has not been an issue yet in Redbridge but will monitor the situation.</p> <p data-bbox="975 842 1407 1178">Both Newham and Redbridge Redbridge have undertaken a revised Gypsies and Travellers Needs Assessments to get an up-to-date understanding. Newham's level of needs was not available at time of writing, but Redbridge consider that they can meet their own level of need within their boundary.</p> <p data-bbox="975 1211 1407 1469">Newham indicated that town centres in Newham outside of Stratford City did not seem to have been impacted greatly by the opening of the shopping centre. This is also generally reflected in Council's own evidence base.</p> <p data-bbox="975 1503 1407 1704">Redbridge has undertaken high level transport modelling assessments on major 'Opportunity Sites'. These studies demonstrate that there should be no significant additional impacts.</p> <p data-bbox="975 1738 1407 1839">Cycle and pedestrian improvements to Roding Valley Way and Ilford Garden junction.</p> <p data-bbox="975 1872 1407 1973">The Council reiterated its objection to expansion plans at City Airport (located in Newham)</p>

LPA / Grouping	Summary of Cross Boundary/Strategic Issues	Outcomes of Cooperation
	<ul style="list-style-type: none"> <li>▪ Restriction of Hot Food Takeaways/Betting Shops</li> </ul>	<p>on the grounds of negative impact on noise and air quality.</p> <p>Cross borough support of planning policies which restrict the proliferation of HFT and betting. Redbridge Local Plan to include a new policy (LP11) on resisting the proliferation/clustering of such uses.</p>
Waltham Forest	<ul style="list-style-type: none"> <li>▪ Spatial Development Strategy</li> <li>▪ Meeting Objectively Assessed Housing Need</li> <li>▪ Green Belt Review / Evidence Base</li> <li>▪ Strategic Development Site Allocations</li> </ul>	<p>General support for Redbridge's overall growth strategy. Support also noted for the Council not pursuing the Wanstead to Woodford Corridor of Intensification option.</p> <p>Waltham Forest is in the same Housing Market Area as Redbridge. Redbridge has prepared an Outer North East London SHMA with the neighbouring boroughs. While Waltham Forest did not take formal part in this process their level of ONA was assessed as part of the study. Waltham Forest consider, as like Redbridge, they are unlikely to meet their ONA within their boundary.</p> <p>General agreement on methodology used to undertake Green Belt Review. General support for proposed areas of Green Belt 'release in Redbridge. It was noted that there are no changes to any Green Belt on adjoining or which cross borough boundaries.</p> <p>No issues raised in relation to strategic site allocations.</p>
Epping Forest	<ul style="list-style-type: none"> <li>▪ Spatial Development Strategy</li> </ul>	<p>General support for Redbridge's overall growth strategy.</p>

LPA / Grouping	Summary of Cross Boundary/Strategic Issues	Outcomes of Cooperation
District Council	<ul style="list-style-type: none"> <li data-bbox="379 320 956 383">▪ Meeting Objectively Assessed Housing Need</li>   <li data-bbox="379 846 847 880">▪ Green Belt Review / Evidence Base</li>   <li data-bbox="379 1375 770 1408">▪ Gypsies and Travellers Need</li> </ul>	<p data-bbox="975 320 1407 808">Epping are currently undertaking their own SHMA. The results of which were not available at the time of writing. However, indications are that the District is unlikely to be able to meet their ONA within their boundary given the nature of the borough (over 95% Green Belt). Officer level discussions were had about if Epping were able to take some of Redbridge's outstanding OAN. Epping stated they would unlikely to be were not in a position to do this.</p> <p data-bbox="975 846 1407 1335">Both authorities were in the process of or had undertaken a Green Belt Review. There was a general agreement on methodology used to undertake both Green Belt Reviews. The results of Epping's review were not available at the time of writing. However, it was noted that there are no changes to any Green Belt on adjoining or which cross borough boundaries. General support for proposed areas of Green Belt 'release' in Redbridge.</p> <p data-bbox="975 1375 1407 1962">Both Epping and Redbridge have undertaken a revised Gypsies and Travellers Needs Assessments to get an up-to-date understanding. Epping's level of needs was not available at time of writing. However, while Redbridge considers that they can meet their own level of need within their boundary Epping discussed the potential of Redbridge taking on some of Epping's need. The Council stated it was not in a position to do this as this would result in the loss of a site for conventional housing allocation or further release of land from the Green Belt in Redbridge.</p>

LPA / Grouping	Summary of Cross Boundary/Strategic Issues	Outcomes of Cooperation
	<ul style="list-style-type: none"> <li>▪ Strategic Development Site Allocations</li> <li>▪ Strategic Transport Infrastructure</li> <li>▪ Flood Risk – River Roding</li> </ul>	<p>No issues raised in relation to strategic site allocations.</p> <p>It was agreed that it was necessary to work jointly with TfL to improve capacity issues on the Central line. New forum set up to address the issue.</p> <p>Woodford Flood Alleviation Scheme and 'Shonks Mill' Flood Storage Area – Working in partnership with EA, Thames Water and adjoining boroughs on implementing the Roding Strategy to minimise flooding of River Roding.</p>