Local Plan Review

Duty to Co-operate Statement

Submission Version

February 2018
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1 Introducing the Duty to Co-operate

1.1 The 2011 Localism Act introduced Section 33A to the Planning and Compulsory Purchase Act 2004, creating the Duty to co-operate between Local Planning Authorities and other prescribed bodies in relation to the planning of sustainable development. The aim of the Duty is to improve the production of effective policies on strategic cross boundary matters, it explicitly relates to the preparation of Local Development documents though the wording of the legislation qualifies this as being ‘in so far as relating to a strategic matter’. Strategic matters are further defined as that which ‘would have a significant impact on at least two planning areas’.

1.2 The London Borough of Newham (LBN) borders seven neighbouring Local Planning Authority (LPA) areas, the Town and County Planning (Local Planning) Regulations 2012 further identify the prescribed bodies to which the Duty applies as:

- the Environment Agency;
- Historic England;
- Natural England;
- the Mayor of London (as represented by the Greater London Authority);
- the Civil Aviation Authority;
- the relevant Clinical Commissioning Group (as representative of the NHS and successor to Primary Care Trusts);
- the Office of Rail Regulation;
- Transport for London (acting as the Integrated Transport Authority for London);
- each relevant Highway Authority (in this case TfL as above and LBN itself, as there are no motorways in the Borough the Highways Agency has no remit);
- the Marine Management Organisation;
- and any Local Enterprise Partnership (in this instance the London Enterprise Panel, also represented by the GLA).

Note that the Homes & Communities Agency listed at Part 2, regulation 4(f) no longer exists.

1.3 The view of central government as enshrined in the Localism Act is that strategic planning should be achieved through Local Plans and by Local Authorities co-operating over cross-boundary issues. To maximise the effectiveness of plan preparation, LPAs and the above prescribed bodies are to engage ‘constructively, actively and on an ongoing basis’. Local Plans can only collectively address strategic issues where each area responds robustly and adequately to evidence-based needs. The National Planning Policy Framework (NPPF) further sets out, in its test of soundness regarding ‘positive preparation’, that Local Plans should be based on strategy which seeks to meet ‘objectively assessed development and infrastructure
requirements’, including unmet requirements from neighbouring authorities where it is reasonable to do so.

1.4 A summary of LBN’s liaison with each of the prescribed bodies is set out in the following sections of this statement along with an identification of the resulting impacts on the Local Plan Review (LPR) where relevant. Other Duty to co-operate activities that have not been relevant to the production of the LPR (participation in other LPAs consultations for example) are reflected in Newham’s AMR bulletins which can be found via the Council’s Local Plan webpage.

2 Local Plan Review Background & Context

2.1 Before examining the ways in which the Council has co-operated with prescribed bodies throughout the drafting of the LPR and the effects this contact has had on its evolution, it is relevant to consider the nature of the document in regards strategic matters and its function within Newham’s Local Plan as a whole.

2.2 Typical of the ‘LDF-style’ format, Newham’s Core Strategy is the central document of the Local Plan, setting out a vision for the Borough over the plan period and an over-arching strategy for all forms of development within the planning area. Across six themes of successful places (including health, urban design, heritage, and town centres), jobs business and skills, homes, sustainability and climate change, and infrastructure, as well as area-specific spatial policies, the Core Strategy governs strategic matters such housing delivery, strategic sites, strategic industrial land, and major infrastructure planning. A second Local Plan document, the Detailed Sites and Policies DPD (DSPDPD), was adopted in 2016 and sits squarely within the strategic approach set out by the Core Strategy, following the same thematic structure and seeking to strengthen implementation of its vision through further development management detail and non-strategic site allocations or designations.

2.3 Since the Core Strategy’s adoption in 2012, there have been a number of changes to the development context (largely through implementation of the strategic vision) in particularly the realisation of development opportunities on a number of identified sites. A number of changes to national and regional policy have also occurred during this time. To ensure that Newham’s planning policies remain robust and up to date, the Local Plan Review (LPR) revisits the existing strategic vision, policy objectives and site allocations, considering any areas that may need strengthening or amending in light of any recent changes. To facilitate future development and ensure that opportunities to positively affect change are maximised, the LPR has also identified additional site allocations and designations. Finally it will also result in the streamlining of Newham’s planning policy documents, consolidating the Core Strategy and DSPDPD into one Plan. The LPR will represent the boroughs Local Plan up to 2033.
3 Co-operation Summaries

3.1 The following organisations detailed in Section 4 and 5 (eleven under prescribed bodies and seven under neighbouring authorities) have been formally consulted for a period of six weeks from February to April 2017 (LPR ‘Issues and Options’ reg.18), from July to August 2017 (on the Infrastructure Delivery Plan) and from November 2017 to January 2018 (on the Proposed Submission Draft Local Plan). Further Duty to co-operate conversations and meetings have been held where considered necessary, including with neighbours during the I&O consultation and with other prescribed bodies where issues arose; more detail can be found in the summaries below.

4 Prescribed Bodies

4.1 Environment Agency

The Environment Agency (EA) has been involved throughout preparation of the Local Plan’s main evidence base study in relation to flood risk, the Strategic Flood Risk Assessment (SFRA). Representatives from the EA informed the brief and tender documents, attended the consultant’s inception meeting, and provided comments on draft and final versions. Specific outcomes of the EA’s involvement in that piece of work include the recognition of latest and not-yet-published modelling information and the sharing of data with neighbouring partners to ensure consistency of approach. SFRA recommendations have been incorporated into the draft Local Plan (see Policy SC3), and further to EA comments provided in response to Reg. 18 consultation, a Duty to cooperate meeting was held in October 2017, following and preceding further discussion of issues. This cooperation has enabled refinement of the redrafted policies, specifically including appropriate reference to groundwater issues, River Basin Management Plan objectives, clarity over roles and responsibility in relation to flood defence upgrades, treatment of culverts, and advice on preparation of the Sequential Test. Environment Agency representations at reg.19 consultation confirmed the plan was sound, minor points of clarification have been reflected in the schedule of minor modifications.

4.2 Historic England

In addition to formal consultation opportunities, a duty to co-operate meeting was held with Historic England in September 2017 to review the 2017 Character Study update and amendments to the Local Plan’s tall buildings policy (SP4) as well as to discuss the Successful Places policies in general. These include policy SP5 ‘Heritage and other successful place-making assets’. Historic England did not raise specific concerns with regard to Newham but offered guidance on the elaboration of the character study. Historic England advised officers of developments with the GLA’s approach to heritage assets in London and the implications of the emphasis on density for the historic environment. Historic England was interested in the design
initiatives being undertaken in the Royal Docks. No concerns were raised at the time. A representation received at Reg. 19 stage indicated support for the broad approach to the historic environment with the evidence base considered to be comprehensive, suitable and proportionate in relation to the Plan’s overall objectives. Various clarification and consistency issues were raised and have been addressed through minor modifications prior to Submission. The only substantive objection was to the suitability of a tall building (19 storeys) adjacent the station at strategic site S24: Woodgrange Road. This was considered to be out of character with the conservation area. This - has been addressed by lowering the indicative height in the site allocation text, to that of a recently consented scheme (on the site) that Historic England did not object to.

Development Management colleagues continue to liaise with Historic England on planning applications affecting Conservation Areas and other designated heritage assets.

4.3 Natural England

In addition to statutory consultation on planning applications within the Borough, Natural England (NE) submitted comments on the Integrated Impact Assessment (IIA) Scoping Report for the LPR (December 2016) and the Regulation 18 ‘Issues and Options’ consultation (February 2017). Comments primarily related to marine biodiversity within the Thames (consideration of which is provided for under policy SC4 and INF6) and specifically led to the inclusion of biodiversity valuation tools and the enhancement of connectivity principles. The need for further consideration of Thames biodiversity impacts has also been included in the sites schedule for relevant sites. Following representations at Regulation 19 consultation (January 2018) a duty to co-operate meeting was held in February 2018, outcomes are reflected in the final Integrated Impact Assessment submitted for Examination and proposed minor amendments to policy SC4. Amongst other things, these amendments commit the authority to work with NE and other authorities in reasonable proximity to Epping Forest SAC, to improve the understanding and monitoring of indirect in combination and cumulative effects of development and where indicated, work towards a strategic solution which will inform future plans.

4.4 Greater London Authority (GLA)

Engagement with the GLA has been extensive and continuous, covering numerous topics as set out below in a range of fora, which formal representations have complemented.

Housing

Beginning in February 2016, via attendance of Strategic Housing Partnership meetings, the Council have undertaken ongoing engagement with the GLA in developing an evidence base in relation to housing need and supply, as part of
both the Local Plan and London Plan review. The most significant undertaking of this task included detailed collaborative work (commencing in February and concluding in October 2017) to feed into the London 2017 Strategic Housing Land Availability Assessment (SHLAA). This involved identifying through a range of data sources (including extant permissions, site allocations, town centre opportunities etc.) any large sites of 0.25ha or above that were suitable and available (either now or within the plan period) for housing (re)development and assessing their potential housing yield through detailed analysis of constraints and future on-site uses. Following this, discussions took place between LBN and the GLA during meetings held in April and May 2017 to agree deletion of unsuitable sites, final site capacities (where queries over capacity assessments had been raised by either party) including from non-self contained permissions and to discuss any further unit delivery from small sites (below 0.25ha) based on windfall trends. Through this work it was understood by LBN that an overarching capacity derived housing target for the borough had been identified. However following this, through independent non-collaborative work not endorsed by LBN, the GLA introduced a potential delivery uplift from small sites (not supported by local policy) using standard pan-London modelling to estimate delivery through intensification of existing residential areas rather than through past windfall trends. This resulted in a significant uplift to the capacity derived figure reached through LBN/ GLA joint working.

**Town Centres**

Town Centre health checks and hierarchy/capacity review: In December 2016 the borough responded to the town centre health check exercise providing data on all of town centres to inform the pan-London review of the hierarchy, development and regeneration potential of centres, and night time economy clusters. This information was gathered from other departments in the Council and from the Town Centre Health checks that were carried out by the planning team.

**Tall Buildings**

Evidence base for tall buildings policy SP4 was elaborated further following initial concerns from the GLA at the Reg. 18 stage. Planning comments from the GLA on proposals for tall buildings in Newham at specific sites have formed part of the context for updating Policy SP4.

**Social Infrastructure**

In February 2018, discussions were held with the Mayor of London’s Night Czar in relation to the protection of pubs and the agent of change principle. The aims of the Draft London Plan were set out during this discussion and LBN’s policy position was set out in. The policy changes proposed by LBN in this area are similar in their aims to the Draft London Plan and the Night Czar was informed that LBN would be making a formal response to the Draft London Plan which would cover this policy area.
Waste

Several workshops took place in 2017 and 2018 as part of the London Waste Planning Forum (more information below) have enabled early scrutiny of Draft London Plan (published November 2017) and ensured the waste policy as revised (INF4) is in line with regional strategy (specifically regarding the protection of all waste sites).

Area Specific Spatial Planning (Royal Docks & Beckton)

Extensive discussions have taken place and continue over the approach to the opportunities and constraints in the Royal Docks and Beckton areas. Collaborative work has included joint surveying of employment land, and joint commissioning of the demand side Employment Land Review (ELR Part 2), ensuring alignment of the Local Plan and OAPF vis-a-vis employment land release, wharf consolidation, capacity protection, strategic infrastructure requirements, and housing potential (overlapping with the borough-wide SHLAA work given the prevalence of large sites in these areas). This is complemented by work streams overseen by the joint GLA/LBN Royal Docks Delivery team to improve the infrastructure, activation and profile of the Royal Docks Enterprise Zone to ensure it realises its potential in economic, social and environmental terms, and similar work relating to GLA and TfL land holdings in the wider area.

Other matters raised in representations from the Mayor of London include, inter alia:

- Support for the general tall buildings approach; however considered the definition needs to be more flexible and less restrictive, particularly in Urban Newham and in the Arc outside of strategic sites, questioning whether the evidence is sufficiently robust. LBN consider the evidence is robust and, in the wider context of the strategic principles and vision based spatial strategy set out in policy S1, justifies the definition of a tall building for Newham, while retaining sufficient flexibility.
- Support for the approach to provision for local jobs (Policy J3), and promotion of culture and night time economy throughout the spatial strategy.
- Support for the requirement for new publically accessible toilets in new strategic development in local or town centres.

Overall, the London Mayor considered the Local Plan Review Proposed Submission to be in general conformity with the London Plan, subject to two minor amendments to the proposed SIL boundaries at Silvertown Landing / Thameside West and Beckton Riverside and no de-designation of Metropolitan Open Land and open space. Discussions on these points continue.

4.5 Civil Aviation Authority (CAA)

No comments were received from the CAA during formal consultation periods.
4.6 **Newham Clinical Commissioning Group (NCCG)**

LBN has undertaken extensive engagement with the NCCG beginning in September 2016, to determine the future of their estates in the context of meeting increasing need arising from the existing and future population; though no formal response was received at Reg. 18 or 19 stage of plan-making. Discussions, which remain ongoing, have informed both the content of the IDP in terms of healthcare infrastructure requirements, and have resulted in the proposed allocation of a number of non-strategic social infrastructure sites, identified for their ability to bring forward or consolidate healthcare floorspace in the borough. The importance of these sites to the NCCG was expressed again in a formal response which the NCCG submitted in response to the IDP consultation. The Council will continue to work closely with the NCCG, to ensure that any changes to their model of infrastructure delivery are adequately captured by the Local Plan.

4.7 **Office of Rail Regulation**

The Office of Rail Regulation’s (ORR) guide to delivering the Duty to cooperate reiterates that they will only consider plans that concern ‘strategic matters’ having a ‘significant impact on’ at least two planning areas. As such, no specific efforts have been made to engage the ORR beyond normal consultation procedures. No response was received at regulation 18 or 19 stages.

4.8 **Transport for London (TfL)**

Engagement with TfL has been extensive and continuous, both through direct meetings and formal consultation responses, and via other officers in the Council working on particular transport infrastructure projects and major development schemes to achieve mutually agreeable outcomes. This has variously included discussion of river crossings, DLR extensions (Beckton to Thamesmead, and Beckton to Barking), new DLR stations (Thameside West and Beckton Riverside) DLR capacity and depot requirements, pedestrian and cycling and interchange interventions (notably at Custom House, West Ham and Stratford and along North Woolwich Road). These projects are at various stages in the planning and implementation process, as highlighted through the IDP. Where further feasibility, scoping and testing of options is yet to be undertaken, the policy and relevant allocations of the draft Local Plan have retained a level of flexibility.

The Plan is also informed by discussions with TfL’s property arm who seek to realise asset value to reinvest in the transport system. This has resulted in extension of the Limmo site to reflect the emerging aspirations to redevelop Canning Town bus interchange, and have highlighted opportunities for co-location of over-station-development elsewhere (particularly the new Thameside West DLR station). Discussions are ongoing with regards to the future of Beckton DLR depot and associated land requirements.
4.9 Highway Authority

The relevant Highways Authorities (mostly neighbouring boroughs and TfL) have been contacted through formal consultation procedures at regulation 18 and 19 stages, as part of the IDP review, and through internal liaison in the case of the borough as a Highways Authority in its own right. Highways England have stated they have no comments to make, the LPR is not considered likely to affect major roads in their jurisdiction.

4.10 Marine Management Organisation

A DtC meeting was held at LBN offices on 29/06/2017 to share information regarding MMO plan production and the overlap with the Local Planning Authority function. Following formal consultation, policy SC3 has been revised to make the link to marine planning clearer (see schedule of minor modifications).

4.11 London Enterprise Panel (LEP)

It was confirmed in writing by the Board Secretary (March 2015) that the LEP does not currently respond to borough-level consultation on Local Plan documents given the GLA’s existing strategic role which is exercised elsewhere through liaison with the Mayor’s office; subsequently, no response was received at regulation 18 or 19 consultation. The LEP have also been consulted as part of the IDP review and their stance is that: Due to the high number of consultation documents we receive, we are not always able to respond individually so if you do not hear from us again and are satisfied that your plan gives due regard to LEAP (the London Economic Action Partnership) priorities, we are content for you to confirm that you have cooperated with us as part of your assurance statement.

5 Neighbouring Planning Authorities

5.1 Certain meetings and groups act as a forum for co-operation between neighbouring authorities, the most significant of these in regards the LPR are identified as follows:

- The Association of London Borough Planning Officers (ALBPO) meets monthly on average, all neighbouring authorities are likely to participate and share information and good practice and input to consultation responses co-ordinated by London Councils to ensure London issues are appropriately articulated/allowed for in National and Pan-London policy.
- The London Waste Planning Forum (LWPF) is for local authorities and other organisations concerned with planning for waste in London (including the GLA, Environment Agency, and private sector providers), the forum enables co-operation across administrative boundaries. Borough’s Biodiversity Forum (LBBF) is a quarterly meeting of council officers (ecologists,
conservation officers, and planners) to share knowledge around the preparation and implementation biodiversity policies across the capital.

- The Planning Policy Forum is convened by the London Legacy Development Corporation (LLDC) for planning officers from authorities surrounding the LLDC area to work to ensure consistency between Local Plans. Meeting on a regular basis, most recently monthly, the group ordinarily consists of LBN, LLDC, LBTH, LBH, LBWF, TfL and the Lee Valley Regional Park Authority.
- Lea River Park governance and planning group: a joint LLDC, LBTH and LBN meeting to plan and deliver the Lea River Park every month-2 months covering project progress, actions needed by different partners and coordinating support through the planning process (plan-making, pre-application discussion etc).

5.2 GLA pan-London work (as detailed above) together with some inter-authority DtC work in the London context, is undertaken under the auspices of pan-London workstreams relating to the London Plan which also inform cross boundary issues in local plans, notably housing capacity, housing need, industrial land management across property market areas, town centre assessments and management of the cross boundary network and hierarchy, transport and other strategic infrastructure planning. For this reason direct contact with neighbouring authorities for DtC purposes is not as extensive as it might be outside of London.

5.3 London Borough of Barking and Dagenham (LBBD)

LBN and LBBD, together with LBR and LB of Havering, collaborated in the commissioning and preparation of the Outer North East London Strategic Housing Market Assessment (published September 2016).

During Issues & Options consultation, LBBD expressed aspirations for:
- a Lower Roding crossing, including a public transport link to Gallions Reach and the Royal Docks;
- a direct rail connection from Barking to Stratford, including upgrades around Forest Gate station to allow for additional capacity;
- improved bus network and services to connect growth areas; and
- joined up cycling/walking infrastructure.

A further meeting was held with LBBD in May 2017, with the main topics covered being: transport, SIL release, the SHLAA 2017 and infrastructure. No cross-boundary issues were raised then or since the publication of LBN’s Reg 19 document. The Council will continue to engage with LBBD on strategic matters as part of their Local Plan process.

In February 2018, in lieu of a DtC meeting (not possible due to time constraints), a summary of changes in the LPR was presented to LBBD. These included:
- The allocation of a strategic site at Beckton Riverside for mixed use development, with aspirations to deliver a new neighbourhood which is focussed on a new town centre and new station.
- New Strategic Infrastructure proposed at Beckton Riverside which includes a new DLR depot and river crossings.
- The strengthening of employment policies, notably the release of a limited area of SIL, and proposed intensification on industrial land.
- A new housing target of 43,000 units over the plan period – in excess of the currently extant London Plan target.

LBBD did not raise any particular concerns regarding the content of the Reg 19 Local Plan Review.

5.4 London Borough of Hackney (LBH)

No representations were received from LBH in relation to the LPR at regulation 18 stage. A meeting was held in May 2017 to discuss the nature and progress of the Local Plan Review. The plan’s policies were discussed in detail and LBH raised no issues with the contents of the LPR. A further meeting was held with LBH in January 2018, with the main topics covered included:

- Progress on Local Plan preparation, timelines and administrative matters;
- Key issues: housing and growth; particularly around the role/classification of town centres; revised tall building definitions; housing requirements and employment land/floorspace;
- Cross-boundary point raised around Lea Bridge Roundabout reconfiguration (LBH) and growth area as part of Lea Valley OA, however no cross-boundary concerns are a factor.
- Emerging London Plan policies and the potential impacts were discussed particularly around housing targets, transport infrastructure to meet growth and approaches towards the management of employment land.

In February 2018 the London Borough of Hackney confirmed the above to be an accurate record of the proceedings.

5.5 Royal Borough of Greenwich (RBG)

No representations were received from LBG in relation to the LPR at regulation 18 stage. A meeting was held in May 2017, with the main areas covered relating to river crossings, transport, OAPFs, the aspiration to transform Woolwich into a Metropolitan Centre and the master planning of Charlton Riverside. No major issues were identified, LBG and LBN take similar approaches to the regeneration of riverside areas – protection of employment, provision of housing and the promotion of town centres. The two boroughs will continue to co-operate, in partnership with TfL and the GLA, in relation to the development of new river crossings.

A further meeting took place in January 2018 regarding LPR. An update was given on Greenwich’s policy initiatives including the promotion of Woolwich as a Metropolitan Centre. Common experiences were discussed with regard to pressures for out of town centre retail development. Greenwich shared planning
problems around a well-known music pub and how the ‘agent of change’ principle can assist which is to be one of the main policy initiatives of Newham’s plan. The conservation officer from Greenwich attending the meeting sought Newham’s support on the designation of two new conservation areas and a number of locally listed buildings. RBG and LBN will continue to co-operate with TfL and the GLA on new river crossings and existing transport linkages.

On 16 Jan 2018 the Royal London Borough of Greenwich responded to Reg. 19 consultation and advised that its officers do not have any concerns regarding the legal compliance and soundness of the document and consider that its preparation has been in compliance with the Duty to Co-operate, particularly with regard to the RBG.

In February 2018, the Royal Borough of Greenwich confirmed the above to be an accurate record of the proceedings.

5.6 **London Borough of Redbridge** (LBR)

LBN and LBR, together with LBBD and LB of Havering, collaborated in the commissioning and preparation of the Outer North East London Strategic Housing Market Assessment (published September 2016).

While no representations were received from LBR in relation to the LPR at regulation 18 or regulation 19 stages, conference calls were held in May 2017 and January 2018 to discuss the nature and progress of the LPR. No issues were raised by LBR; other matters discussed included:

- Progress on Local Plan preparation, timelines and administrative matters;
- Sub-regional growth strategy, including strategic allocations, town centre strategy, public transport enhancements;
- Implications of pan-London SHLAA process and results; and
- Emerging London Plan policies potential impacts.

In February 2018 LBR confirmed the extent of matters discussed and that no cross boundary issues were identified. Further, LBR confirmed their support for LBN Regulation 19 document.

5.7 **London Borough of Tower Hamlets** (LBTH)

No representations were received from LBTH in relation to the LPR at regulation 18 or 19 stage, however the response in relation to the IDP review indicated support and cooperation in delivering Lea Valley connectivity and green space projects, and a desire to further engage in relation to cross-boundary pupil mobility. At Duty to Cooperate meetings which took place in April and September 2017 and January 2018, no issues were raised, however other matters discussed included:

- Progress on Local Plan preparation, timelines and administrative matters;
- alignment of Lea River crossings within both Local Plans;
• impacts of retail development at London City Island (LBTH) on Canning Town town centre;
• adjoining tall building areas identified in Leamouth (LBTH) and Canning Town (LBN);
• SFRA production (new modelling of the River Lea was shared between LBN, LBTH and the Environment Agency, ensuring some consistency of treatment and response);
• implications of pan-London SHLAA process and results; and
• emerging London Plan policies potential impacts.

In February 2018 LBTH confirmed the above is an accurate representation of discussions.

5.8 London Borough of Waltham Forest (LBWF)

No representations were received from LBWF in relation to the LPR at Reg. 18 or Reg. 19 stage. Following a conference call in May 2017 to discuss the nature and progress of the the Local Plan Review, LBWF confirmed via email that the LPR did not raise “any particular issues of strategic or other nature that would cause significant harm to the principles and policies this Council is currently pursuing in its aspirations to deliver sustainable development within its own boundaries.” Further to this, another meeting was held by LBN with LBWF in January 2018, following the conclusion of LBN’s Reg. 19 public consultation. This meeting was to discuss the Local Plan progress of both organisations. This meeting did not raise any cross-boundary issues of a strategic or non-strategic nature that would negatively impact on the principles and policies set out in the plans of either LBN or LBWF. In February 2018 LBWF confirmed that the above is an accurate representation of the discussions.

5.9 London Legacy Development Corporation (LLDC)

LBN officers meet with the LLDC on a regular basis as part of the Planning Policy Forum, together with 1:1 meetings and data sharing as necessary. In relation to Local Plan Review, these have covered evidence base alignment, (e.g. re population and expenditure projections) associated strategic infrastructure planning, (notably schools, healthcare, transport and waste) area-based strategy, (e.g. relating to tall buildings, employment designations and capacity, retail, key connections) housing and employment land monitoring and SHLAA capacity. Discussions also particularly focus on the complementary management of Stratford town centre in planning terms given that it stretches across both Planning Authority areas.

In February 2018 the LLDC confirmed the above is an accurate representation of discussions.
6  **Impacts on Local Plan Review**

6.1  Instances where the plan document has been directly shaped by cooperation with prescribed bodies and non-statutory partners are listed below in relation to subject area.

**Spatial Strategy and Strategic Site Allocations**

- Agreed with GLA (and PLA) in principle, the strategic approach to consolidation of Thameside West wharf operations on Central Thameside West (S07) strategic employment site (at Peruvian and Royal Primrose wharves), and release of safeguarded Sunshine Manhattan and Thames wharves, together with the relocation on site and managed release of other non-safeguarded wharves in the area; this has informed Policies S3 and strategic allocation S07, further reflected in policies J2 and INF1. Until the publishing of the Mayor’s Safeguarded Wharves Review provides further clarity, any development of other wharves in the borough, particularly Mayer Parry wharf on Canning Town Riverside (S12), will be subject to London Plan policy.
- S1 provides additional support for the principle of context sensitive development that integrates with and strengthens local character by optimising the potential of historic, cultural and other assets and opportunities, as recommended by Historic England. Cues to development opportunities presented by and adjacent to heritage and other local character assets, together with specific recognition of listed heritage, have also been updated in area-specific policies S2-6 and their respective strategic site allocations.
- Following engagement with TFL, the need to expand the Beckton DLR depot to support wider regional growth is supported through policy S3 and site allocation S01. Updates from TFL at Reg. 19 regarding works to the DLR network have been included in policy S5, and resulted in minor corrections/clarifications to policies S2 and S3 and site allocations Abbey Mills (S10), Silvertown Quays (S21), Thames Wharf (S08), and Albert Basin (S19).
- Lea River Park key connections have been included in spatial policies and site allocations as relevant.
- Indicative heights proposed for Woodgrange Road West (S24) have been amended following further consideration in light of the objection of Historic England at Reg. 19.
- Engagement with NCCG has informed requirement for delivery a health facility on Queen’s Market strategic site.

**Successful Places**

- TFL’s Healthy Streets initiative to put health at the centre of our decision making in transport helping everyone to use cars less and to walk, cycle and use public transport more has informed policies SP2 ‘Healthy Neighbourhoods’ and SP7 ‘Quality Movement Corridors’.
- Consultation with Historic England has helped to devise the SP4 ‘Tall Buildings’ policy in compliance with its latest guidance. Historic England has provided
guidance on elaboration of the character study for the borough. It has also informed the update of the historic assets policy SP5. Its comments at Reg. 18 stage have refined and strengthened the vision statements for the strategic sites.

- Scrutiny of GLA policy comments and attendance at GLA meetings in respect of Mayor of London referable applications in the borough have enabled close coordination of the review of the Successful Places policies in Newham with new draft London Plan policies.

Jobs, Business and Skills

- Approach agreed with the GLA to level of SIL release and appropriate direction of travel for the plan-led and managed approach (including Managed Release/Transition and Intensification Criteria) to employment land.
- Agreed with the GLA and PLA, in principle, the strategic approach to consolidation of wharf operations at Thameside West
- Support from the GLA for promotion of culture and the night-time economy set out in J1 and across the spatial strategy;

Homes

- A new housing target based upon the capacity derived housing figure arrived at through SHLAA 2017 work (see para 4.4) using an uplift modelled on past trends.

Sustainability and Climate Change

Liaison with the GLA, Environment Agency, and Natural England has informed revisions to:

- SC1 (importance of gasholder remediation, ‘green grid’ approach, water efficiency for non-residential uses, land contamination procedures, and overheating)
- SC2 (heat pumps, smart meters)
- SC3 (set back and defence upgrade expectations)
- SC4 (biodiversity net gain and use of DEFRA matrix)
- SC5 (enclosure of waste facilities and other polluting uses / operations)

Infrastructure

- Provision for DLR depot expansion, new stations and river crossings, safeguarding of operational transport infrastructure (TfL).
- Co-ordination of infrastructure planning as reflected in the IDP and site allocations to reflect that population growth in the LLDC and LBN LPA areas results in infrastructure requirements, and use will not defer to LPA boundaries.
- Consultation with the NCCG has resulted in a number of healthcare site allocations in policy INF8, these consultations have also informed the content of the IDP
- Revision of waste policy (INF3) in line with updated (2016) regional (London Plan) strategy.
- Re-drafting of INF4 (Utilities Infrastructure) in light of GLA studies regarding power in the Royal Docks. INF4 has also been informed by liaison with TfL (future-
proofing space for ducting) as well as utilities providers including Thames Water, UK Power Networks, and National Grid.

- Confirmation of continued appropriateness of policy and boundaries in relation to Stratford town centre.