

Redbridge Local Plan: 2015-2030

**Statement of Common Ground between the London Borough of Redbridge and
the Greater London Authority**

June 2017

Introduction

This Statement of Common Ground has been prepared jointly between the London Borough of Redbridge ("the Council") and the Greater London Authority ("the GLA").

The purpose of this Statement of Common Ground (SoCG) is to inform the Inspector and other parties about the areas of agreement between the Council and the GLA. Outstanding matters are listed at the end of the Statement.

Background

The GLA has been involved throughout the production of the Redbridge Local Plan, having submitted representations to earlier consultations in 2013 and 2014, expressing overall support for the Plan and its proposed strategy.

The GLA's representation to the Pre-Submission Local Plan (October 2016) was in the form of a letter of non-conformity, particularly in relation to the Council not demonstrating "exceptional circumstances" for the need to go into the Green Belt to meet housing and infrastructure needs. They stated that further work could be done exploring the potential for existing town centres and transport corridors to accommodate higher density growth.

Following Regulation 19 consultation, officers from the Council and the GLA have worked closely on matters raised in the representation with the intention of agreeing some common ground prior to the examination hearings taking place.

This Statement of Common Ground has been prepared to identify areas of agreement between Redbridge Council and the GLA on matters relating to the Council's Submission Local Plan: 2015-2030. It reflects the latest position between both parties, in light of the Council's response to the Inspector's Issues and Questions.

In Respect of Issue	Representation Ref. No
LP3 Affordable Housing	R01213/07
LP4 Specialist Accommodation (student housing)	R01213/08
Policies Map & Southend Road SIL designation and approach to employment land in LP14	R01213/09 – R01213/10

In Respect of Issue	Representation Ref. No
LP1C – clarification of commercial floorspace	R01213/12

Notes on agreed amendments:

1. Underlined text and bold indicates an addition to the Local Plan text
- ~~2. Strikethrough text indicates a deletion to the Local Plan text~~

i. Chapter 3 – LP3 Affordable Housing

In light of the Inspector’s Issue 5 question xii, the Council has now considered the Mayor’s Draft Affordable Housing & Viability SPG 2016 (CED107) and, after further discussions with the Mayor, considers that the proposed modifications below will bring the Local Plan in line with the Mayor’s aspirations for affordable housing as set out in the SPG. The modifications will also increase the level of affordable housing sought on new housing schemes and make a larger contribution to addressing affordable need in the borough.

The modifications supersede modification numbers 45 and 46 set out in document LBR 1.01.2, Schedule of Modifications.

Amend part 1 of policy LP3 as follows:

‘The Council will seek to maximise the provision of affordable housing in the borough by setting a minimum strategic affordable housing target of 35%. The Council will achieve and seek to exceed this by:…’

Modify LP3 1 (a) as follows:

Delivering on average a minimum of ~~336~~ **393** additional affordable homes per year

Modify LP3 1 (d) as follows:

‘Proposals will need to provide a viability assessment in order to justify the level of affordable provision on each site should proposals be below the ~~minimum 30%~~ **35%** policy requirement or where public subsidy is required to deliver the 35%’.

Amend 5th sentence in paragraph 3.9.5 as follows:

“In order to address the acute level of housing need in the borough, whilst also seeking to ensure that housing development remains viable the Council will adopt a

minimum strategic affordable housing target of ~~35%~~ 30% and a corporate affordable housing delivery target of ~~336~~ 393 homes per year or ~~5,040~~ 5,895 units over the plan period.”

In addition, the Council propose the following modification to the first sentence of paragraph 3.9.6 to state:

The Council aims to maximise every opportunity to deliver affordable housing in accordance with London Plan policy 3.12 – Negotiating Affordable Housing and the Mayor’s affordable Housing and Viability SPG (2016).

Include additional paragraph to reflect the Council’s aim of seeking to maximise affordable housing from all sources. Insert the following after para 3.9.6 as follows:

“All schemes are expected to maximise the delivery of affordable housing and make the most efficient use of available resources to achieve this objective in accordance with the London Plan (2016) and the policies of this Plan. In accordance with the Mayor’s Draft Affordable Housing and Viability SPG (2016), the Council will ensure affordable housing delivery is maximised from all sources, by considering a variety of funding and design solutions such as use of grant, RP’s own funding and innovative funding models to increase the overall number of affordable homes”.

At the end of paragraph 3.9.6, insert the following:

The Council will seek to achieve and exceed affordable housing through applying the 35% target on private schemes and seeking higher levels of delivery through grant funded, registered provider and council-led schemes.

GLA’s position

The GLA supports the proposed additional paragraph and the reference to the Mayor’s Draft Affordable Housing and Viability SPG. The GLA also supports the Council’s increased minimum strategic affordable housing target of 35% which it will seek to exceed, and viability testing for individual sites which are below 35% or where public subsidy is required to deliver the 35%.

ii. LP4 Specialist Accommodation to include guidance on future student housing provision

Include new section in policy LP4 Specialist Accommodation to refer to student accommodation as follows:

Student Accommodation

Where student accommodation is required to meet strategic and local need, it will be supported where it is appropriately located within:

(a) One of the borough's Investment and Growth Areas;

(b) Within or at the edge of a town centre; and

(c) In an area of good public transport accessibility.

In addition to meeting the requirements of the above, proposals for student accommodation will also need to demonstrate that:

(a) There would be no loss of existing housing;

(b) There would be no adverse impact on local amenity, in particular, the amenity of neighbouring properties and on-street parking provision;

(c) The accommodation is of a high standard, including adequate unit size and compliance with daylight and sunlight standards;

(d) Provision is made for units that meet the needs of students with disabilities;

(e) The need for the additional affordable bedspaces can be demonstrated; and

(f) The accommodation can be secured by agreement for occupation by members of a specified educational institution(s).

Create a new sub-heading **Student Accommodation** and subsequent supporting text after paragraph 3.10.7 as follows:

Student Accommodation

Whilst there are no universities located within Redbridge and there is unlikely to be any significant increase in demand for student housing over the plan period, the Council support the provision of student housing in the borough. The London Plan (2016), policy 3.8, seeks to encourage a more dispersed distribution of future student provision taking into account development and regeneration potential in accessible locations. The Council will therefore support student housing in highly accessible locations, particularly areas with excellent transport connections to central London, such as Ilford and Crossrail, in accordance with policy LP4.

As also noted by the London Plan, paragraph 3.53, addressing demand for student housing should not compromise conventional housing supply, particularly affordable housing or undermine mixed and balanced communities. The Council will therefore resist student housing which would result in the loss of residential (C3)

accommodation. New purpose built student housing may reduce pressure on conventional housing which is currently occupied by students.

The Council will seek to secure student housing at rent level which are affordable levels to the wider student body.

GLA's position

The GLA welcomes the inclusion of a new section in Policy LP4 Specialist Accommodation which refers to student accommodation, including affordable student housing.

iii. LP14 - Approach to employment land and Policies Map SIL designation

Amend Policies Map to clearly show which part of Southend Road Business Park refers to PIL and which refers to IBP.

To provide further clarity, the Council is proposing the following change to paragraph 3.21.3:

"Industrial land uses continue to make a valuable contribution to local employment and provide important local services. The Council recognises the role these play in providing a suitable range of jobs and acting as locations in the borough for jobs, **and therefore seeks to protect its best quality industrial land alongside planned growth of new business space**" ~~A number of leading UK companies have made Redbridge their head office location in recent years."~~

GLA's position

The proposed amendment to the Policies Map to differentiate clearly between PIL and IBP on Southend Road Business Park is welcomed. The proposed change to paragraph 3.21.3 is in line with London Plan policies 2.17 and 4.4 is also welcomed.

iv. LP1C – clarification of commercial floorspace figures

Update content of LP1C policy box as follows:

"New retail floorspace – ~~5,000~~ **7,000 sq.m**

New employment floorspace – ~~40,000~~ **2,500 sq.m**


New Jobs – ~~500~~ **550**"


Update penultimate sentence in paragraph 3.5.6 to read:

"The town centre has the capacity to provide approximately 40,000 7,000 sq.m of new retail floorspace (Policy LP9)"

GLA's position

The GLA is pleased to see a clarification of commercial floorspace figures relating to LPC1 policy box.

Signed on behalf of the London Borough of Redbridge		
Name & position	Signature	Date
Ciara Whelehan Planning Policy Manager		5 th June 2017

Signed on behalf of the GLA		
Name & position	Signature	Date
Juliemma McLoughlin Assistant Direct - Plannin		5 th June 2017

Outstanding Matters

GLA position	Redbridge position
<p>Chapter 3 - Redbridge minimum housing target & work to release additional capacity in town centres and the Investment & Growth Areas</p>	<p>The Council has undertaken an exhaustive search of all brownfield land across the borough. The housing capacity of all sites in Appendix 1 has been reassessed. In accordance with the SHLAA (2013) methodology the Council has reviewed the PTAL, character, constraints of each site and applied densities in accordance with the London Plan Density Matrix to form a revised capacity estimate. This demonstrates that all brownfield sites within the borough do not offer sufficient development capacity to meet or exceed London Plan minimum targets. Without any Green Belt release, London Plan minimum housing targets cannot be met, let alone exceeded.</p> <p>The Council considers the fundamentals of the Pre-Submission Plan are sound. In line with London Plan (2016) policy 3.3, the Plan's strategy is to meet and exceed the minimum housing target of 1,123 homes a year, and seeks to close the gap between need and supply, Redbridge's OAN of approximately 2,000 per year.</p> <p>The Council considers it has exceptional</p>

GLA position	Redbridge position
	<p>circumstances to justify releasing some land from the Green Belt to meet its housing and social infrastructure needs. A robust assessment of existing brownfield land and former employment land following the methodology of the London Plan (2013) SHLAA has concluded that, along with windfall sites, 16,171 units can be delivered over the life of the Plan. This is 674 units under the Mayor's minimum target. Therefore, in order to attempt to close the gap between need and supply, it is necessary to look into the Green Belt to accommodate the borough's development needs.</p>
<p>Further work could be done that releases additional capacity. Most of the sites identified in proposed policy LP1B-E appear large enough to be able to result in a neighbourhood with a distinctive character at a higher density in line with policy 3.7 of the London Plan.</p>	<p>The Council has reviewed the housing capacity of all identified Opportunity Sites, most of which are covered by policies LP1B-E (on brownfield land) as set out in Appendix 1. This has been undertaken in accordance with the SHLAA 2013 methodology and the London Plan Density Matrix (2016). As a result of this work, the Council has proposed modifications to Appendix 1.</p> <p>It is clear that capacity testing at a higher density in line with policy 3.7 of the London Plan would result in the Council being able to meet and exceed the London Plan. However, further intensification of these areas are likely to have a significant impact on the borough's key transport junctions and links, character, townscape, sustainability and the inability of smaller sites to deliver key education infrastructure. The Transport Assessment (2017) and Sustainability Appraisal (2017) support</p>

GLA position	Redbridge position
	this.
<p>The Mayor would not support constraints on rebuilding flats on small infill sites as set out in paragraph 3.12.7 of the Local Plan.</p>	<p>The intention of the statement set out in paragraph 3.12.7 is not about restricting new development on small infill sites. This is a wider issue in relation to how the Council is seeking to maintain a balanced housing stock in certain parts of the borough. The policy aims to manage the proliferation of HMOs (especially large HMOs that need planning permission) as an overconcentration of such uses can have a negative impact, affecting character and amenity of an area.</p>
<p>It is likely that Ilford and other and Investment & Growth Areas have capacity for more housing. This could be achieved particularly by increasing densities to at least the higher end of the London Plan Density matrix</p>	<p>As part of developing the growth scenarios for the Local Plan, sites located within Ilford, the Crossrail Corridor and Gants Hill Investment & Growth Areas have been assessed against the higher end of the London Plan Density Matrix, as per the response to R01213/02. Whilst this demonstrates that the minimum housing target could be achieved, it is likely to have significant impacts upon the borough's transport, townscape, heritage and character. This is supported by the Sustainability Appraisal, Transport Assessment and Tall Buildings Study.</p>
<p>Given South Woodford's Investment & Growth Area's location in the London-Stansted Cambridge Corridor (LSCC), there could be opportunities to increase the number of new homes in South Woodford (from 650) through higher density and infill development.</p>	<p>See response to second point above.</p>
<p>The Mayor believes that "exceptional circumstances" for the release of the</p>	<p>All sites proposed for green belt release have been determined not to meet NPPF</p>

GLA position	Redbridge position
<p>sites in Redbridge has not been demonstrated. The following sites should not be released from the Green Belt:</p> <ul style="list-style-type: none"> - Land at Billet Road - Hainault Fields (Oakfield) & Fairlop Plain - Claybury Hospital - Roding Hospital & surrounding area - King George and Goodmayes Hospital & the Ford Sports Ground 	<p>Green Belt tests as set out in the Green Belt Assessment (2016) and the Green Belt Addendum (2017).</p> <p>The Council has not made an assessment of the potential contribution these sites make to London's green infrastructure because the Council requires these sites to be released from the green belt to meet the borough's development needs.</p> <p>The Council's development needs, in particular, the need to provide land for housing and infrastructure, amounts to "exceptional circumstances" which the Council considers is justification to amend green belt boundaries. The Council is releasing them for this purpose, not to contribute towards green infrastructure or MOL as set out in London Plan policy 7.17. Releasing land from the Green Belt and designating it as MOL does not constitute "exceptional circumstances".</p> <p>The Green Belt Assessment (2016) and Green Belt Addendum (2017) set out in detail the key findings for each of the proposed green belt sites.</p>

