

**Redbridge Local Plan: 2015-2030**

**Statement of Common Ground between the London Borough of Redbridge and  
the London Borough of Waltham Forest**

**February 2017**

## Introduction

This Statement of Common Ground has been prepared jointly between the London Borough of Redbridge (“the Council”) and the London Borough of Waltham Forest (“LBWF”).

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 LBWF. Subject to LBWF being satisfied with the position set out below, there are no outstanding matters where the Council and LBWF are in disagreement.

## Background

Through Duty to Cooperate meetings, the Council has worked closely with LBWF on the production of the Redbridge Local Plan. Continuous and ongoing discussions between both parties have identified those key cross boundary issues relevant to their respective Local Plans.

In response to the Pre-Submission Local Plan consultation, LBWF submitted a representation largely supporting the vision and priorities set out in the Local Plan, providing points of clarification on the Plan rather than specific soundness comments.

This statement sets out amendments to the Pre-Submission Plan that both parties agree to. There are a number of outstanding matters listed at the end of this Statement, however, the Council considers these are not fundamental issues and do not affect the soundness of the Local Plan. Subject to these amendments, there are no outstanding matters where the Council and LBWF are in disagreement.

| <b>In Respect of Issue</b>  | <b>Representation Ref. No</b> |
|---|-------------------------------|
| LP14 to clarify where B8 uses will be supported to meet need for additional floorspace. | R01212/02                     |
| Additional information required on infrastructure projects from the IDP                 | R01212/04                     |
| Policy LP20, 3 (b) to explain how the carbon offset fund is calculated.                 | R01212/09                     |
| LP33 – change references to English Heritage to Historic England                        | R01212/10                     |

## Notes on agreed amendments:

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

### i. Amend LP14 to refer to B8 uses

Protecting and directing industrial activity to the borough's Strategic Industrial Locations (SILs) at Hainault Business Park and Southend Road Business Park as the prime locations for Class B1 (business), Class B2 (general industry), and class B8 (storage and distribution) development. Proposals for uses falling outside the above uses will be resisted;

Amend LP14 (c) to read:

Intensifying and managing Local Business Areas of Newton Industrial Estate, Forest Road, Hainault Works, ~~and Ravens~~ Road, and Connaught Road West. In these areas the Council will support:

Intensification of Class B1 (business), Class B2 (general industry), and Class B8 (storage and distribution) uses; particularly premises to accommodate small and medium enterprises (SMEs); and

## London Borough of Waltham Forest position

The Council supports the proposed change and has no further comments.

### ii. Update Appendix 2 Key Infrastructure Projects

The Infrastructure Delivery Plan (IDP) is being finalised for Submission. Appendix 2 and Policies LP1A to LP1E of the Local Plan will reflect the revised IDP.

## London Borough of Waltham Forest position

The Council notes the position as set out above and has no further comments.

### iii. Amend LP20 to refer to future carbon offsetting fund

Insert the following into the Implementation Box of policy LP20:

5. The Council will produce a Planning Obligations SPD that will include details on how a carbon offset fund could work in the borough.

### London Borough of Waltham Forest position

The Council notes the position as set out above and has no further comments.

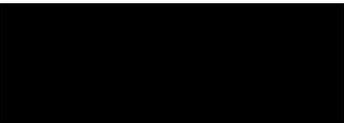
#### iv. Amend LP33 to Historic England

Agree to correct all references to Historic England in LP33 and throughout the Local Plan where relevant. See response to Historic England on the same issue. See response R01218/20.

### London Borough of Waltham Forest position

The Council notes the position as set out above and has no further comments.

| Signed on behalf of the London Borough of Redbridge |   |                                |
|---|---|--------------------------------|
| Name & position                                     | Signature   | Date                           |
| Ciara Whelehan<br>Planning Policy Manager           |  | 27 <sup>th</sup> February 2017 |

| Signed on behalf of the London Borough of Waltham Forest |   |                                |
|--|---|--------------------------------|
| Name & position  | Signature   | Date                           |
| Joe Addo-Yobo<br>Head of Planning Policy & Strategy      |  | 24 <sup>th</sup> February 2017 |

## Outstanding Matters

| LBWF position   | Redbridge position  |
|---|---|
| <p>Why have Redbridge selected a min housing target of 1,123 considering the evidence from the SHMA regarding need and borough capacity of 18,774?</p>  | <p>In line with London Plan (2016), Policy 3.3, the Council is seeking to meet and exceed the minimum target of 1,123 homes over the life of the plan period. The Local Plan identifies the potential for 19,074 new homes to be delivered across the borough up to 2030. This capacity demonstrates that the Council has the potential to meet and exceed the London Plan target of 16,845 and close the gap between need and supply, which is 2,123 homes a year as identified in the Outer North East London Strategic Housing Market Assessment.</p> <p>No further change required.</p> |
| <p>Policy LP20 should also encourage business users to reduce energy consumption and retrofit energy efficiency measures, rather than focus primarily on domestic users.</p>  | <p>Policy LP20 focuses on all forms of development. The policy in criteria 3 refers to all new major development that includes both residential and non-residential development.</p> <p>No further change required.</p>   |
| <p>LP20 - Widen reference to Decentralised Energy Networks rather than focusing on Combined Heat and Power</p>  | <p>Policy LP20 aims to support and promote sustainable forms of energy in the borough by protecting existing DE networks and supporting their expansion. It also states that new major development schemes should be evaluated for the feasibility of Combined Heat and Power Systems. It is considered that the policy does not particularly focus on either DE networks or CHP systems, but expresses Council support for both where feasible. Overall it is considered to be a balanced approach.</p> <p>No further change required.</p>   |
| <p>CHP is not often viable in development under 300 units. LP20 says development over 10 units, re-word policy to refer to communal heating and use of DE networks rather than CHP for development over 10 units.</p> | <p>Policy LP20 states that major development over 10 units should be evaluated for the feasibility and viability of CHP systems, CHP is not required by the policy for all schemes over 10 units (or over 1,000sqm in size). Major development over 10 units must first undergo an evaluation for the feasibility and viability of CHP, which may well demonstrate that some major schemes are not viable.</p> <p>No further change required.</p>   |

| LBWF position  | Redbridge position   |
|--|--|
| <p>The GLA Housing SPG requirement for Carbon Offset Fund contributions is in place, the words <i>'where appropriate'</i> in LP20 at 3(b) should be removed.</p> | <p>The GLA's Housing SPG requirement for Carbon Offset Fund contributions, is that they are applicable where development does not meet Standard 35 (and Policy 5.2), which states:</p> <p><i>'Development proposals should be designed in accordance with the LP energy hierarchy, and should meet the following minimum targets for carbon dioxide emissions reduction.</i></p> <p><i>Year: improvement on 2013 Building Regulations</i><br/> <i>2014 - 2016 35 per cent</i><br/> <i>2016 - 2036 Zero carbon</i></p> <p><i>Energy hierarchy</i><br/> <i>To achieve the targets for minimising carbon dioxide emissions, the Plan outlines a three step energy hierarchy to guide developers on how they may design low or zero carbon development. The hierarchy consists of the following steps:</i></p> <p><i>Step 1. Be lean: use less energy</i><br/> <i>Step 2. Be clean: supply energy efficiently</i><br/> <i>Step 3. Be green: use renewable energy</i></p> <p>Where schemes are not meeting zero carbon standards a carbon dioxide off-set price can be applied. This is also reflected in London Plan (March 2016) Policy 5.2 <i>'Minimising Carbon Dioxide Emissions'</i>. Therefore the words <i>'where appropriate'</i> are suitable in the policy.</p> <p>No further change required.</p> |