

**Redbridge Local Plan: 2015-2030**

**Statement of Common Ground between the London Borough of  
Redbridge and London Wildlife Trust**

**July 2017**

## Introduction

This Statement of Common Ground has been prepared jointly between the London Borough of Redbridge (“the Council”), and London Wildlife Trust.

The purpose of this Statement of Common Ground (SoCG) is to assist the Examination of the Redbridge Local Plan, by informing the Inspector and other parties of areas of agreement between the Council and London Wildlife Trust.

## Background

In response to Regulation 19 Consultation, London Wildlife Trust made a number of detailed comments and suggestions of how the Local Plan could be strengthened from a biodiversity and ecology perspective. In response, the Council has put forward a series of modifications to the plan, as set out in the Schedule of Modifications (LBR 1.01.2). This statement outlines where both parties agree on the modifications put forward by the Council.

## Modifications

<b>Modification Number</b>	<b>Proposed Modification</b>	<b>London Wildlife Trust Position</b>
2	<p>Amend last sentence of paragraph 1.22.2 to read:</p> <p><i><u>“Epping Forest is designated as a Natura 2000 site, whilst Hainault Forest Country Park is of regional importance in supporting breeding populations of a range of priority species.”</u></i></p>	Proposed modification supported
19	<p>Insert new 5th bullet point to King George and Goodmayes Hospital box (page 28) to read:</p> <p><i><u>“Enhanced open space provision, including the protection and enhancement of land designated as a Site of Importance for Nature Conservation.”</u></i></p> <p>And amend 3rd bullet point of Ford Sports Ground box (page 28) to read:</p> <p><i><u>“Ensure the appropriate levels of open space provision, including the protection and enhancement of land designated as a Site of Importance for Nature</u></i></p>	Proposed modification supported

Modification Number	Proposed Modification	London Wildlife Trust Position
	<u>Conservation</u> "	
81	<p>Rephrase paragraph 4.3.8 to read:</p> <p><i>"Trees are a prominent feature in the borough and significantly contribute not only to local character but also in <u>terms of climate change adaptation</u>. <del>mitigating against the effects of climate change</del>. In accordance with LP38 new development should seek to incorporate new trees and other vegetation as part of their development to further contribute to the 'greening' and help adapt to <del>of the borough and mitigate against the impacts of climate change</del>."</i></p>	Proposed modification supported
89	<p>Amend 2nd sentence of point (f) to read:</p> <p><i>"All new developments on sites with existing culverts should seek opportunities to de-culvert these streams to reduce flood risk and provide <u>nature conservation benefits</u>; <del>and</del>."</i></p>	Proposed modification supported
96	<p>Amend final sentence of paragraph 4.6.2 to read:</p> <p><i>"An added benefit of SuDs is that they can improve the water quality of rivers, lakes and streams (<u>in accordance with the objectives of the Water Framework Directive</u>) by removing many pollutants and much of the particulate matters from storm water before it leaves the development site. <u>They can also be multifunctional and provide biodiversity benefits</u>"</i></p>	Proposed modification supported
117	Amend 3rd sentence of 4.17.1 to read:	Proposed modification supported

Modification Number	Proposed Modification	London Wildlife Trust Position
	<p><i>“Other adverse impacts include use of unnecessary amounts of energy and in some detrimental effects on road safety or on wildlife <u>such as through disturbance to the ecosystems of nocturnal species</u>”</i></p>	
135	<p>Amend first sentence of paragraph 5.7.5 to read:</p> <p><i>“These heritage assets are irreplaceable resources that have broad social, cultural, <u>environmental</u> and economic significance, and which are important to this and future generations.”</i></p>	Proposed modification supported
140	<p>Rephrase point 2(b) to read:</p> <p><i>“Supporting development which improves access to Green Belt areas for beneficial uses such as outdoor sport and recreation where there is no conflict with protecting the openness <u>and nature conservation value</u> of such land.”</i></p>	Proposed modification supported
145	<p>Rephrase penultimate sentence of paragraph 6.2.2 to read:</p> <p><i>“The borough’s open spaces <u>include</u> <del>provide</del> habitats and <u>areas of biodiversity value (see LP39), and helping</u> to control and manage flood risk and mitigate the risk of climate change.”</i></p>	Proposed modification supported
148	<p>Amend last sentence of paragraph 6.3.1 to read:</p> <p><i>“Such spaces also contribute to maintaining and enhancing biodiversity (See LP37 <del>and</del> LP389)”</i></p>	Proposed modification supported

Modification Number	Proposed Modification	London Wildlife Trust Position
150	<p>Amend first two sentences of paragraph 6.6.3 to read:</p> <p><i>“Other important sites include Sites of Special Scientific Interest covering parts of Epping Forest, Wanstead Flats and Hainault Forest. Sites of Importance for <del>Metropolitan</del> Nature Conservation <del>Importance</del> <u>include several sub categories that reflects their value and how they were identified. In total there are 35 SINCs in the borough, which are shown on the Policies Map and listed in Appendix 5.</u> <del>include the River Roding and Seven Kings Water.</del>”</i></p> <p>Insert new Appendix 5 to read as follows, and renumber subsequent appendices accordingly:</p> <p><b><i>“Appendix 5 – Sites of Importance for Nature Conservation</i></b></p> <p><u><i>Sites of Metropolitan Importance</i></u></p> <ul style="list-style-type: none"> <li>• <i>Epping Forest</i></li> <li>• <i>Hainault Forest</i></li> <li>• <i>Epping Forest South</i></li> <li>• <i>River Roding north of the Liverpool Street to Southend Railway</i></li> <li>• <i>Claybury Wood</i></li> </ul> <p><u><i>Sites of Borough Importance (Grade 1)</i></u></p> <ul style="list-style-type: none"> <li>• <i>Claybury Park Grassland</i></li> <li>• <i>Fairlop Plain and Fairlop Water</i></li> <li>• <i>Hainault Forest Country Park and Golf Course</i></li> <li>• <i>Roding Valley Park</i></li> </ul> <ul style="list-style-type: none"> <li>• <i>Hainault Lodge Local Nature Reserve</i></li> <li>• <i>Hargreaves Scout Camp, Seven Kings Water and Goodmayes Hospital</i></li> <li>• <i>River Roding South of Liverpool Street to Southend Railway</i></li> </ul>	<p>Proposed modification supported, but recommend adding:</p> <p><u><i>include several sub categories that reflects their value and how they were identified. In total there are <b>currently</b> 35 SINCs in the borough, which are shown on the Policies Map and listed in Appendix 5.</i></u></p> <p>as there shouldn't be a fixed number of SINCs.</p>

Modification Number	Proposed Modification	London Wildlife Trust Position
	<p><u>Sites of Borough Importance (Grade 2)</u></p> <ul style="list-style-type: none"> <li>• South Park</li> <li>• Valentines Park</li> <li>• Woodford Bridge Green Pond</li> <li>• Central Line Railsides</li> <li>• Goodmayes Park</li> <li>• Ilford to Chadwell Heath rail sides</li> <li>• Alders Brook at Ilford Golf Course</li> <li>• Woodford Green and Ponds</li> <li>• The Exchange Lands</li> <li>• Wanstead War Memorial (Tarzy Wood)</li> <li>• Whiskers Island</li> <li>• Trinity High School Pond</li> <li>• Loxford Water</li> </ul> <p><u>Sites of Local Importance</u></p> <ul style="list-style-type: none"> <li>• Ilford Cemetery and St. Mary's Churchyard</li> <li>• Clayhall Park</li> <li>• Cocked Hat Plantation (Hurstleigh Gardens Open Space)</li> <li>• Loxford Park</li> <li>• The Glade, Woodford Bridge</li> <li>• Newbury Park War Memorial Garden</li> <li>• West Wood Recreation Ground</li> <li>• Well Brook at Navestock Crescent Recreation Ground</li> <li>• Gardens of Peace</li> <li>• Redbridge Recreation Ground"</li> </ul>	
153	<p>Amend paragraph 6.4.1 to read:</p> <p><i>"The green infrastructure network is a multi-functional resource that includes a <u>range of types</u> <del>number</del> of open spaces including the green belt and Sites of Importance for Nature Conservation, parks, paths, walkways, <u>SuDS features</u>, and other environmental features such as the Blue Ribbon Network. <del>It</del> <del>The green infrastructure network</del> links places both</i></p>	Proposed modification supported

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	<p><i>within and beyond the borough and encourages walking, cycling and access to nature whilst also providing biodiversity benefits. Green infrastructure therefore plays a vital role in improving people's quality of life."</i></p>	
154	<p>At end of 6.4.5 insert:</p> <p><u><i>"This will be particularly important given that some parts of the borough are currently deficient in access to open space and nature (see figures 24 and 25)."</i></u></p> <p>Insert new figure 25: Areas of Deficiency for Nature (and renumber subsequent figures accordingly)</p>	Proposed modification supported
155	<p>Amend last sentence of paragraph 6.5.1 to read:</p> <p><i>"The Council recognises <u>the role</u> that trees play as part <del>role in</del> of the borough's green infrastructure (see LP36), providing scenic amenity, local environmental quality, provide local character, promoting biodiversity (see LP389) and mitigating climate change and air pollution (see LP18)."</i></p>	Proposed modification supported
156	<p>Under implementation section of Policy LP38 insert additional point 4 to read:</p> <p><u><i>"4. Further guidance on protecting trees and enhancing the landscape is provided in the Trees and Landscaping SPD."</i></u></p> <p>And additional implementation point 2 under Policy LP39 to read:</p> <p><u><i>"2. Further guidance on protecting and enhancing the natural environment is provided in the Nature Conservation SPD."</i></u></p>	Proposed modification supported

Modification Number	Proposed Modification	London Wildlife Trust Position
157	<p>Amend policy point 1b to read:</p> <p><i>“b) Protecting designated international, national and local sites of nature conservation importance including Sites of Special Scientific Interest covering parts of Epping Forest, Wanstead Flats and Hainault Forest and <u>all Sites of Importance for Nature Conservation as identified on the Policies Map</u><del>Sites of Metropolitan Importance for Nature Conservation (SMIs) covering the River Roding and Seven Kings Water Corridors;</del>”</i></p> <p>Amend policy point 1c to read:</p> <p><i>“c) Promoting the qualitative enhancement of <u>all sites of biodiversity value sites, (including the Blue Ribbon Network, designated SSSIs, SACs, SINCs, and other sites with protected and priority species), by supporting proposals that improve access, connectivity and the creation of new habitats throughout the borough. Measures include</u> <del>by</del> maintaining trees, native vegetation, and improving and <u>restoration</u> <del>ation</del> of open spaces and green infrastructure <del>providing new areas of such vegetation</del> for the benefit of wildlife; and”</i></p>	Proposed modification supported
158	<p>Under Policy LP39 amend point 1d to read:</p> <p><i>“Working with partners and local conservation groups to improve conditions for biodiversity in the borough <u>in accordance with the Biodiversity Action Plan.</u>”</i></p>	<p>Proposed modification supported, but would like to add:</p> <p><i><u>in accordance with the Biodiversity Action Plan/ Nature Conservation Strategy.</u>”</i></p>
159	Amend paragraph 6.6.4 to read:	Support this in principle.

Modification Number	Proposed Modification	London Wildlife Trust Position
	<p><i>“The Council will resist any inappropriate and harmful development on SINC’s and Local Nature Reserves (LNRs) unless there are exceptional circumstances and where the importance of any development coming forward outweighs the nature conservation value of the site. In such circumstances, appropriate mitigation measures must be taken and where practicable and reasonable, additional nature conservation space must be provided. <u>There is only one LNR in the borough (Hainault Lodge), which is also designated as a SINC.</u>”</i></p>	<p>Recommend that the additional line is amended to:</p> <p><u><i>There is <b>currently</b> one LNR in the borough (Hainault Lodge), which is also designated as a SINC.</i></u></p> <p>This then does not preclude the Council from declaring other LNRs in the future. (Barking &amp; Dagenham have 8 LNRs, Havering 7, Waltham Forest 1, and Newham none). However, we are concerned that the current SINC network hasn’t been reviewed for c20 years (let alone sites which might now merit SINC status), representing a worrying gap in the evidence base for the application of this policy. Without the accurate data on the biodiversity impacts of a proposed development, an LPA can’t make an informed decision. This is contrary to both London Plan policy 7.19 and the 2006 NERC Act.</p>
160	<p>Amend last sentence of paragraph 6.7.1 to read:</p> <p><i>“They also contribute <u>to</u> and promote biodiversity (LP369).”</i></p>	Proposed modification supported
163	<p>Additional terms to the glossary to read as follows:</p> <p><u><i>“Sites of Importance for Nature Conservation – Sites of Importance for Nature Conservation (SINC’s) are areas designated for their importance for wildlife to help inform planning decisions and management. In London SINC’s are designated as one of a hierarchy of types: Sites of Metropolitan Importance, Sites of</i></u></p>	Proposed modification supported

<b>Modification Number</b>	<b>Proposed Modification</b>	<b>London Wildlife Trust Position</b>
	<p><u><i>Borough Importance (grade 1 and 2), and Sites of Local Importance.”</i></u></p> <p><u><i>Green Infrastructure – A network of green spaces – and features such as street trees and green roofs – that is planned, designed and managed to provide a range of benefits, including: recreation and amenity , healthy living, reducing flooding, improving air quality, cooling the urban environment, encouraging walking and cycling, and enhancing biodiversity and ecological resilience.”</i></u></p>	

As can be seen from the above, London Wildlife Trust is largely supportive of the modifications put forward by the Council in response to their Regulation 19 representations.

Where some further minor alterations have been suggested by London Wildlife Trust (i.e. regarding modifications 150, 158, and 159 above), the Council is in agreement that these are acceptable.

Regarding further comments on the evidence base underpinning SINC designations, the Council draws attention to its position as set out in examination document CED021.

Signed on behalf of the London Borough of Redbridge		
Name & position	Signature	Date
Ciara Whelehan Planning Policy Manager		17 <sup>th</sup> July 2017

Signed on behalf of London Wildlife Trust		
Name & position	Signature	Date
Mathew Frith Director of Conservation		14 <sup>th</sup> July 2017