

**Redbridge Local Plan: 2015-2030**

**Statement of Common Ground between the London Borough of Redbridge and  
Historic England**

**July 2017**

## Introduction

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

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 Historic England. Outstanding matters are listed at the end of the Statement.

## Background

Historic England’s representation generally welcomes the content of the Local Plan with regard to the historic environment, but suggests some additional text to preserve and enhance historic assets in the borough. Areas of concern include a lack of explicit recognition in the Local Plan for built heritage as an asset that can contribute positively to the Council’s regeneration aspirations; clarity on the effects of growth on heritage; and a lack of clarity on the policy approach towards archaeology.

The balance between the Council’s approach to growth and the protection of heritage in the borough is the main area of concern of the representation. At a meeting on 7 December 2016 between the Council and Historic England, the Council recognised that whilst the growth targets in the Local Plan are high, preserving and enhancing the borough’s historic assets is a key objective, and any further intensification within town centres that contain a significant proportion of the borough’s heritage assets, is very likely to have a detrimental effect upon the character of the borough’s built heritage.

All suggested modifications with regard to the above issues are set out below. Outstanding matters are listed at the end of the statement.

<b>In Respect of Issue</b>	<b>Representation Ref. No</b>
Appendix 1 does not contain details for developers on how to accommodate heritage assets within or adjoining sites.	R01218/01
Policies Map - Make conservation areas clearer on inset maps of the Local Plan Policies Map	R01218/02
Iford Investment & Growth Area, p22 - It should be made clear that growth ambitions should be reconciled with Local Plan objectives for respecting and enhancing the borough’s heritage	R01218/03
Objectives 1 and 4 in Section 2 of the should better reflect the Council’s approach and obligations o heritage assets in the borough	R01218/04

In Respect of Issue	Representation Ref. No
Ilford 3.2.4 - Valued townscapes within growth areas should be treated sensitively	R01218/06
<p data-bbox="177 362 796 517">Inset maps 1, 4, 5 and 6 should be modified to: show a clearer tall buildings boundary for Ilford; show Valentines Park more clearly; better define conservation areas.</p> <p data-bbox="177 546 796 651">Little Heath conservation area should be recognised as a heritage asset in Local Plan text.</p>	R01218/07 - R01218/11
LP10 – second bullet of part 6 should be changed to strengthen policy.	R01218/12
Section 5/6 - the historic environment should be seen as an asset, refer to it in Section 6 as well as Section 5.	R01218/13
Policy LP26 – minor changes are needed to text in the policy, and para. 5.1.13 to better protect heritage assets.	R01218/14 - 15
<p data-bbox="177 1084 796 1189">Policy LP27 – The Plan should consider: a range of low rise density typologies; the impact of tall buildings on heritage assets.</p> <p data-bbox="177 1218 796 1301">Historic England’s Advice Note 4 should be referenced.</p>	R01218/16 - R01218/18
Policy LP33 – mention the borough’s seven entries in the Heritage at Risk register in policy introduction	R01218/19
Overall Local Plan Document - Make corrections to the name ‘English Heritage’ to read ‘Historic England’ wherever errors occur	R01218/20
<p data-bbox="177 1621 796 1727">Paragraphs. 5.7.3 and 5.7.4. – Insert paragraphs on archaeology between the paragraphs.</p> <p data-bbox="177 1756 796 1839">Introduce text to discuss archaeology in the supporting text of the policy LP33.</p>	R01218/21

## 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. **Appendix 1 – should include text on accommodating heritage assets in/near sites, with indicative development figures explained:**

Updates to Appendix 1 are currently being carried out by the Council, in response to the Inspector's update of 27 June. A revised Appendix 1 document will be published and placed on the Council's website on 28 July 2017.

**Historic England's position** – Noted. Further comments can be submitted following publication of modifications, as appropriate.

- ii. **Policies Map inset maps**

Amend inset maps on the Policies Map to make conservation areas clearer.

**Historic England supports the proposed change.**

- iii. **Iford Investment & Growth Area, p22 - growth ambitions should be reconciled with Local Plan objectives for the borough's heritage.**

Insert new para. after 3.2.4 as follows:

**'New development should also conserve or enhance the character and appearance of conservation areas and conserve other heritage assets and their settings within Investment and Growth Areas, as part of a positive approach towards conservation of the borough's historic character within the growth strategy.' the Plan?**

**Historic England supports the proposed change.**

- iv. **Local Plan Section 2 - Objectives should be amended to better reflect the Council's approach and obligations to heritage assets in the borough.**

Amend point 4, Objective 1 as follows:

'Respect and enhance the character of the borough's ~~established residential neighbourhoods~~ **built heritage and residential neighbourhoods**'

Amend point 4, Objective 4 as follows:

To ~~preserve~~ **conserve** and enhance the unique character ~~historic environment~~ of Redbridge, and the **character and** distinctiveness of the borough's conservation areas and other historic and valued buildings, spaces and places'.

**Historic England supports the proposed changes.**

- v. **Ilford Para. 3.2.4 – make it clear how heritage assets are to be integrated sensitively into the intensification of Ilford**

Add the following text to the last sentence of paragraph 3.2.4 as follows:

‘Development within Investment and Growth Areas, but which fall outside of designated town centres should respond to the character and context of surrounding areas, including without limitation, respecting and enhancing the character of the established residential neighbourhoods, **and the character and significance of designated heritage assets**’

**Historic England supports the proposed change.**

- vi. **Inset Maps 1, 4, 5 and 6 – make designations of special character clearer on Inset Maps:**

These modifications will be included in the updated ‘Policy Map Modifications Inset Maps’ document (LBR 1.02), and can be commented on during consultation following publication of modifications.

**Historic England’s position:** Noted. Further comments can be submitted following publication of modifications, as appropriate.

- vii. **Paragraph 3.4.5 Crossrail Corridor - Include Little Heath Conservation Area within the text as a recognised heritage asset.**

Add the following text to the end of para. 3.4.5. as follows:

‘Chadwell Heath Station, the Eva Hart Public House and the Art Deco Bingo Hall on the corner of Wangey Road are important local landmarks, and **to the north of Chadwell Heath Centre, Little Heath Conservation Area is an important local heritage asset.**’

**Historic England supports the proposed change.**

- viii. **Local Plan Policy LP10 – amend text to reflect heritage assets and strengthen policy**

Change the second bullet of LP10 as follows:

~~Optimise heritage and natural assets~~ **Respond to, and work positively with historic and natural assets**’

**Historic England supports the proposed change.**

- ix. **Section 6: Managing & Enhancing the Borough’s Assets – this section should make reference to the historic environment as a borough asset.**

Include reference to heritage assets at the end of paragraph 6.1.2, as follows:

**Other important assets include the borough's heritage assets, including conservation areas, listed buildings, historic parks and archaeology. The Council's policy approach for the historic environment and its preservation and enhancement as a key borough asset is outlined in detail in Section 5 of the Plan**

Historic England supports the proposed change.

- x. **Policies LP26 and LP27 - include response to heritage assets to strengthen policies and reflect LP33**

Amend LP26 as follows:

(c) '**conserves and** enhances the character **and significance** of the historic environment and complements the borough's heritage assets, **and their settings**, in accordance with LP33'

Insert the following text to the end of para. 5.1.13:

'...well integrated with the surrounding area, and should ~~preserve or~~ **conserve and** enhance the special character of areas of historic or architectural value, **and the settings of heritage assets**.

Add a new sentence to the end of para. 5.2.1, to read as follows:

**There are a number of building typologies, as outlined in the Redbridge Characterisation Study (2014), that could be used to achieve higher density development, without the need for tall buildings. Other approaches include the new London vernacular design palette, which involves the development of stacked maisonettes, flats and town houses, intensifying capacity without building multi storeys.**

Include new text at the end of second paragraph of policy LP27 to read as follows:

'...and where it relates well to the urban layout, streets, open spaces, **heritage assets**, and public realm of the surrounding area'

Point (b): amend text to read as follows:

'...the effect it has on heritage assets **and their settings**'

Amend text in paragraph following point (g), to read as follows:

'...amenity space, ~~built~~ **conservation of the historic environment** and sustainability.'

Add the following text to the last sentence of para. 5.2.12 to read as follows:

This work will inform future planning brief work for specific sites, **and will be guided by Historic England's Advice Note 4 on Tall Buildings.**

Historic England supports the proposed changes.

xi. Paragraph 5.7.4 to include a list of heritage at risk in Redbridge.

Insert new criteria i) to paragraph 5.7.4 to read as follows:

**‘ i) Entries on the national Heritage at Risk Register 2016:**

- **831 High Road, Ilford, Goodmayes (listed Grade II);**
- **The Dr Johnson Public House, Longwood Gardens, Ilford;**
- **Garden Temple, in Garden of Temple House, 14 The Avenue, Wanstead (Listed Grade II\*);**
- **Wanstead Park, Wanstead, Redbridge (registered Park and Garden Grade II\*);**
- **Mayfield/Bungalow Estate, Conservation Area, Mayfield Seven Kings, Redbridge;**
- **Wanstead Park Conservation Area, Wanstead, Redbridge;**
- **Woodford Bridge Conservation Area, Woodford, Redbridge.**
- **6-8 High Street (listed grade II)**

Historic England’s welcomes the proposed change. To fully align with para 126 of the NPPF and a positive strategy for the historic environment we recommend that the text refers to an active approach to addressing heritage at risk. For instance:

Add the following sentence at the end of paragraph 5.7.5, page 115 of the Local Plan:

*‘Heritage assets at risk will also be part of a proactive approach to ensure their future is secured.’*

**Historic England supports the proposed changes.**

xii. **Make corrections to the name ‘English Heritage’ to read ‘Historic England’ in the following text:**

Local Plan Policy Box 33, Criteria 4 a), Line 9 –

‘Advice should be taken from ~~English Heritage~~ **Historic England** and provision should be made for on-site investigations that include the recording of archaeological evidence within the affected area’.

Local Plan Policy Box 33, Implementation Action 1, Line 4 –

‘1. Develop criteria for the designation of Conservation Areas in the borough, directed by advice and guidance from ~~English Heritage~~ **Historic England** and the heritage sector.’

Local Plan Policy Box 33, Implementation Action 5, Line 5 –

‘5. Work with owners, the heritage sector, bodies providing grant funding and local communities to find viable solutions that secure the long-term future of heritage assets on ~~English Heritage’s~~ **Historic England’s** Heritage at Risk Register.’

Appendix 3 Monitoring Framework, Theme 4, Delivery Agency column -

'LBR Planning & Regeneration Service,  
LBR Leisure Services  
Sport England  
Natural England ~~English Heritage~~ Historic England'

**Historic England supports the proposed change.**

**xiii. Supporting text for Policy LP33 should include text regarding archaeology**

Include a new sub-heading, 'Archaeology' after paragraph 5.7.5 as follows:

**Archaeology**

**'The Council will take advice on the management of its archaeological assets listed in paragraph 5.7.4 from the Greater London Archaeological Advisory Service (GLAAS), Historic England. The Council's Archaeological Priority Areas are supported by the 'Archaeological Priority Areas Appraisal' (April 2016), and the Council consults GLAAS, Historic England on planning applications located within the Archaeological Priority Areas.'**

Make changes to criteria 4 of Policy LP33 as follows:

**'4 Archaeology**

(a) Requiring an archaeological evaluation that proposes effective mitigation measures for development proposals involving significant groundwork within Archaeological Priority ~~Zones~~ **Areas** (as identified on the Policies Map), or in other areas with archaeological interest. ~~Advice should be taken from English Heritage and p~~ **Provision** should be made for on-site investigations that include the recording of archaeological evidence within the affected area.

**b) Resisting development which impacts on archaeological assets of national significance**

**c) Requiring, where appropriate, public interpretation, access and exhibition of artefacts through appropriate planning conditions'**

In the Implementation Section of Policy LP33 insert new point:

**'9. Where archaeological sites are identified and are considered to be nationally important, provision will be made for their preservation in-situ. Where archaeological sites are of less importance planning conditions will be used to achieve appropriate archaeological recording. Where significant archaeology is to be recorded appropriate planning conditions may be used to achieve public and community archaeology, such as site visits, school projects, popular publications and web resources.'**

**Historic England supports the proposed changes.**

Signed on behalf of the London Borough of Redbridge		
Name & position	Signature	Date
Ciara Whelehan, Planning Policy Team Leader		17/07/17

Signed on behalf of Historic England		
Name & position	Signature	Date
Katharine Fletcher, Planning Adviser, London		17/07/17

### Outstanding Matters

Historic England's position	Redbridge position
<p>Section 3 Policy LP1:</p> <p>The positive approach outlined in para. 3.2.3 with regard to the history and unique qualities of the borough could be expressed explicitly in part a) of Policy</p> <p>Add positive text from 3.2.3 to part a) of Policy LP1 (R01218/05)</p> <p>To ensure clarity, entitle Chapter 5 'High quality design <i>and conservation</i>' as conservation of the historic environment is not fully encapsulated within design considerations.</p>	<p>Suggested changes to Policy LP1 are unnecessary as paragraph 3.2.3 already makes it clear that the growth strategy balances the historic and unique qualities of the borough.</p> <p>The title of Local Plan Chapter 5 will not be modified.</p>

### Unresolved Issues, pending publication of further modifications to the Local Plan:

- i) Modifications to supporting text for Appendix 1 to include references to the incorporation of heritage assets within new development.
- ii) Modifications to Inset Maps 1, 4, 5 and 6.