

## Agenda Item 7

Date <b>3 September 2013</b>	Classification <b>Public</b>	Committee <b>Local Development Framework Advisory Panel</b>
From <b>Chief Planning &amp; Regeneration Officer</b>		Title Of Report <b>Core Strategy Preferred Options Report – Results of Consultation</b>

**This report is of interest to all Members**

### 1. Executive Summary

- 1.1 Consultation on the revised Core Strategy Preferred Options Report took place between 7 January and 22 February 2013. Some 177 representations were received during the formal consultation period. A further 31 late responses were received mainly at the end of March and beginning of April 2013. These late responses were all from residents local to the Oakfields site who expressed concern about potential development on the site following the circulation of a letter from Old Parkonians sports club.
- 1.2 This report canvasses the main themes of the consultation responses. It highlights the views of key stakeholders such as the Mayor of London and points to any major issues where the Council may wish to review its proposed policy positions or engage in further work before moving on to draft the Pre-submission Local Plan (Core Strategy Review) for a further round of consultation later this year.
- 1.3 There was good overall support for basing the Core Strategy around the pursuit of sustainable development and identifying Investment Areas where growth can be accommodated. This included the statutory consultation agencies and in particular the Mayor of London who also praised the Green Belt review as a “comprehensive study”. The Mayor suggests further dialogue is needed before he can support the Council’s approach to car parking (maximum and minimum standards) and affordable housing (no target).
- 1.4 Several representations questioned the Council’s inability to identify sufficient sites to meet full housing need and to this end a number of developers suggested additional sites for release from the Green Belt (see Appendix A). The tension between protecting what existing residents find good about the borough while also providing housing and facilities for future residents has emerged as the biggest test of the revised strategy. Representations suggest the need for ongoing dialogue with the community about the future use of key sites such as the Oakfields playing fields.
- 1.5 Of the Council’s detailed policy proposals, those which drew the greatest interest included the restriction on hot food take-aways (well supported), restriction on flats in residential areas (residents in favour, developers against); open space protection (very strong support for protection with some people objecting to the proposed two category approach) and dwelling sizes (strong support for increasing minimum sizes).

**2. Recommendations**

That the Advisory Committee:

- 2.1 Note and comment on this report.
- 2.2 Subject to any comments above, endorse the proposed approach to preparation of the Pre-submission Local Plan (Core Strategy Review).

**THE DECISIONS PROPOSED IN THE RECOMMENDATIONS TO THIS REPORT MAY NOT BE REQUISITIONED IN ACCORDANCE WITH STANDING ORDER 54.1(r).**

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### 3. Background

- 3.1 Consultation on the revised Core Strategy Preferred Options Report took place between 7 January and 22 February 2013. Some 177 representations were received during this period and a further 31 late responses were mainly received in the beginning of April, although a couple continued to come in as late as July. The Council must consider the matters raised by them before drafting the Pre-submission Local Plan (Core Strategy Review) for a final round of consultation in 2014.
- 3.2 This report identifies the most significant issues raised, but cannot address every comment made in each representation. A summary of all representations is available for viewing on the Core Strategy Review web page:
- [http://www2.redbridge.gov.uk/cms/planning\\_and\\_the\\_environment/planning\\_policy\\_regeneration/local\\_development\\_framework/core\\_strategy\\_review.aspx](http://www2.redbridge.gov.uk/cms/planning_and_the_environment/planning_policy_regeneration/local_development_framework/core_strategy_review.aspx)
- 3.3 A full copy of individual representations will be made available to Members who wish to read them.

### 4. Matters Raised in Representations

- 4.1 This section considers the content of representations following the order in which issues and policy proposals were dealt with in the Preferred Options Report (POR). Established policies which were not proposed to significantly change are not included unless representations specifically sought changes.
- 4.2 Overall Approach  
While there were a great many representations for and against individual policy proposals, most representations suggested the POR document had been well understood. A number of representations welcomed the way the Council had sought to respond to the Government's National Planning Policy Framework (NPPF) and embed a balanced approach to sustainable development throughout the document.
- 4.3 Investment Areas  
There were very few objections to the Council's proposal to identify five Investment Areas as the focus of most new development. However, some Area Committee comments suggested that the proposed areas were too heavily focussed on the south of Redbridge and that growth should be more widely distributed across the borough.
- 4.4 Meeting Housing Need  
The POR proposes to adopt the Mayor's current London Plan minimum housing target of 760 dwellings per annum (current target is 905 per annum), but acknowledges that housing need is running at around three times this figure. The target is a minimum for new residential dwellings only and housing need can be addressed through other sources of supply such as household extensions to raise the capacity of the existing stock, bringing

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empty homes back into use and providing specialised housing for groups such as the elderly and retired.

- 4.5 Nevertheless, under the most optimistic assumptions, Redbridge will be unable to meet full need and this led a number of developers to suggest the strategy was flawed and that more needs to be done to release land for housing (including further release of Green Belt land). The Mayor of London also suggested that the Council should look for further sites, but did not object outright because the target proposed by the Council is that set for Redbridge in his own London Plan. The Mayor is currently assembling evidence to inform a review of London Plan housing targets in 2015 and may expect any emerging target for Redbridge to be reflected in the emerging Local Plan (Core Strategy Review).
- 4.6 Developer representations cited the NPPF which says that the Council should plan to meet the full objectively assessed housing need, but the NPPF qualifies this with the words "as far as consistent with the policies set out in the Framework". The Council's position is that sustainable development requires a balance to be struck between sometimes competing priorities. It is doing all it reasonably can to find housing sites, but demand for housing must be balanced against other important sustainability considerations including the protection of open space, Green Belt and neighbourhood character. This is a key issue which is likely to be tested at the independent examination.
- 4.7 Developer representations proposed several additional parcels of land for release from the Green Belt with the aim of contributing to housing supply. These are considered in an addendum to the Green Belt Review at Appendix A.
- 4.8 To demonstrate that the Council has properly considered these sites, Officers have prepared an "Addendum" to the 2010 Green Belt Review. It concludes that the Green Belt boundaries had been incorrectly drawn in relation to two parcels of land (Fernhall Cottages at Roding Lane South and Repton Court and Claire House at Fullwell Avenue and Repton Grove). This was probably due to mapping errors which can be corrected on the pre-submission Policies Map. Any development potential arising from these small boundary changes is inconsequential. The Addendum report did not support the removal of any other land from the Green Belt, including several larger parcels put forward by developers.
- 4.9 Affordable Housing  
National planning policy no longer requires the Council to set a target for affordable housing, but the London Plan continues to do so. The current 50% target was imposed on the Council when the Core Strategy was first examined in 2007/2008 because it was a requirement of the then London Plan.
- 4.10 The current London Plan does not specify any set figure but says the Council should come up with its own target (percentage or numerical). The POR argued that past targets have proven unachievable and counterproductive and proposed not to adopt one but nevertheless to seek the maximum

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reasonable amount of affordable housing on individual schemes through a requirement for developers to engage with Registered Providers at the earliest possible moment and demonstrate that they have explored every potential source of funding.

- 4.11 Unrealistic targets also undermine the viability of any housing development coming forward at all. The Government has stressed the importance of not over-burdening development with affordable housing demands and has moved to allow developers to appeal signed s106 agreements for affordable housing on the grounds that they are unviable.
- 4.12 The Mayor's representation suggested he had some reservations about the Council's approach but hinted at a possible compromise with the Council adopting a "monitoring target". This may suggest an overall aspiration to deliver some set amount of affordable housing from all sources of supply (e.g. new homes, purchase and repair, bringing empty homes back into use), but not a binding requirement on individual development schemes. Further discussion with the Mayor is warranted, as a mutually acceptable compromise is clearly preferable to outright Mayoral objection.
- 4.13 Housing Choice  
The POR proposed a much tougher stand against new build flats in areas of family housing to mirror an existing (and highly successful) policy position against flat conversions. Several developers objected to this and suggested that a blanket ban of flats was unjustified, given the extent of housing demand. The Mayor of London also noted that this could impede housing delivery, but did not object. Representations from residents and residents' associations were generally supportive but some argued against the Council's intention to continue to allow new build flats in residential locations already dominated by flats. They sought a ban across all residential areas.
- 4.14 This is another issue which may be tested at examination and again the Council will need to rely on the notion of balance in achieving sustainable development. The Investment Areas are strongly pro-development and respond to the need to provide for growth, but they have their corollary in policies which seek to protect established neighbourhoods from undue growth pressures which could undermine their character. The Characterisation Study referred to later in this report could help the Council justify its approach which is intended to resist infill development within suburban streets rather than prevent flats on larger self-contained sites as developers fear.
- 4.15 Gypsies and Travellers  
There were no objections to the proposal to designate the existing authorised site at Forest Road Hainault for Gypsies and Travellers and to support the provision of one additional pitch if it becomes necessary to meet future demand as projected by the Redbridge Gypsy and Traveller Accommodation Needs Assessment.
- 4.16 Protecting Shops  
The POR proposed to remove the current policy general guideline which suggests that 70% of town centre units should be Class A1 shops and to

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support a more flexible approach in which all uses that contribute to active, vibrant town centres are supported. This is in line with the recommendations of Mary Portas and was generally supported by representations.

- 4.17 Members will also be aware that the Government has recently changed planning rules to allow empty shops to convert to a variety of other uses on a temporary basis and is further proposing to allow shops to be converted to residential dwellings as permitted development. This compounds the difficulty of any policy approach based on maintaining a set proportion of A1 uses.
- 4.18 Controlling Hot Food Take-Aways  
In contrast to the above more flexible approach, the POR proposed much stricter limits on hot food take-aways in the interest of controlling litter, noise, unhealthy eating and preventing the crowding out of more desirable town centre uses. This position was generally well supported by representations. However, the Mayor suggested that any proposal to restrict A3, A4 or A5 uses would need further justification and robust evidence.
- 4.19 Offices  
The POR proposed a more flexible approach to the conversion or replacement of outdated and underutilised office buildings. This is consistent with the NPPF and was generally supported by representations. The Government has also recently revised permitted development rules to allow existing office buildings to be converted to residential dwellings without the need for planning permission.
- 4.20 Community Facilities  
The POR proposed a very strong policy presumption in favour of new or expanded community facilities to ensure that housing growth is matched with a supply of schools, health clinics, leisure facilities and the like. This position was very well supported by representations. There were many individual suggestions about the facilities which are most in need, with a swimming pool being raised in several representations.
- 4.21 Giving Certainty About Development Sites  
A number of individual development plans and Area Action Plans which identify particular sites for preferred forms of development have been adopted since the LDF system was introduced. The POR proposed to rationalise and consolidate all these sites in one comprehensive list along with new sites identified more recently through studies such as the Strategic Housing Land Availability Assessment and the Green Belt Review. This would allow two currently adopted (but now outdated) documents to be revoked (the Development Sites with Housing Capacity DPD and Development Opportunity Sites DPD), thus simplifying the range of planning documents.
- 4.22 This approach was broadly supported and the NHS welcomed proposals in relation to the King George and Goodmayes Hospitals and surrounding land, but some representations queried the inclusion of particular sites. Most notably, there were a large number of objections (mainly received after the formal consultation deadline) to the release of the Oakfields Playing Fields site from the Green Belt and its proposed designation as a major Opportunity Site. Existing leaseholders such as the Old Parkonians pointed to the

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contribution their football and cricket clubs make to local sport and the regional importance of their facilities. They also lobbied local residents by way of a letter drop inviting them to submit comments to the Council. Consequently 31 letters and e-mails were received from local residents, mainly in March and April, which expressed concern about any development proposals for Oakfields, particularly around potential increased traffic congestion that they felt could be a result.

- 4.23 The Planning Policy team has responded to all the residents clarifying that there are not yet any detailed proposals for Oakfields and that development of the site would be a long-term project and it is important that the Council works with existing users and residents to ensure that their needs are taken into account as fully as possible. It is inconceivable that such valued sports facilities will be lost, and if retaining playing fields on the existing site is not possible, future work may include identifying alternative sites in the Green Belt for sporting activities. Outdoor sport and recreation and associated clubhouse facilities continue to be acceptable uses of Green Belt land in planning policy terms.
- 4.24 Planning for Neighbourhoods  
Neighbourhood planning is a new initiative which has emerged since the current Core Strategy was adopted. Accordingly the POR proposed that revised policy should acknowledge Neighbourhood Plans and offer an appropriate level of assistance to community groups wishing to prepare them. This proposal proved completely uncontroversial and several representations supported it.
- 4.25 Addressing Climate Change  
The POR proposed:
- An overall target for CO<sub>2</sub> emission reductions for the borough.
  - Emission reduction targets for new residential and non-residential buildings.
  - Requiring householders to make improvements to the wider fabric of their homes as a condition of planning permission for residential extensions (e.g. better insulation, more efficient boilers etc).
  - Introducing a carbon "off-setting" fund to accept financial contributions from developers who cannot meet emission reduction targets.
  - That new development connect to decentralised energy schemes (if such schemes are taken forward).
  - General policy support for renewable energy schemes.
- 4.26 There was wide general support for policies to address climate change and the Mayor of London said the Council's approach was consistent with his London Plan. Several representations from residents objected to being required to make consequential improvements when extending their homes and suggested this would be financially onerous (for the same reason the Government has decided not to proceed with a similar policy it had proposed nationally).
- 4.27 A number of representations from developers and the NHS suggested that the impact of proposals on the financial viability of schemes needs to be

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considered. The only representation addressing the carbon off-setting fund sought more detail on what is proposed.

### 4.28 Locating Development

As an adjunct to its climate change proposals, the POR proposed a policy to steer development towards accessible locations to reduce the need to travel and promote public transport, walking and cycling. This proved to be uncontroversial.

### 4.29 Providing Car Parking

The use of "maximum" only off-street car parking standards was imposed on the Council when the Core Strategy was first examined in 2007/2008.

"Maximum" standards were then required by both national planning policy and the London Plan. The NPPF no longer requires "maximum" standards, but the London Plan still does. Accordingly the POR proposed to specify both "maximum" standards and a basic "minimum" upon which the Council would insist.

4.30 The Mayor (through TfL) has indicated that this is still not in full conformity with the London Plan, but recognises local concerns and says minimum standards could play a role in areas of low public transport accessibility, but not across the whole borough. He has requested further discussion. The Mayor's language was conciliatory and it is clearly in the Council's interest to engage further with him to achieve a mutually acceptable compromise if at all possible.

### 4.31 General Design, Scale and Height of Buildings

The POR proposed a new policy expressing the outcomes sought to ensure that good design is central to all new development. This would be a strengthening of existing policy, rather than a departure from it and the proposal was generally well supported by representations. English Heritage suggested the need to undertake a Characterisation Assessment to (among other things) determine appropriate locations for tall buildings. Several representations from residents did not favour tall buildings at all.

### 4.32 The Size of New Dwellings

The POR proposed to replace the current minimum internal size standards for new dwellings with those now provided in the London Plan. The London Plan minimum dwelling sizes generally exceed the currently adopted local standards and this proposal was well supported by representations.

### 4.33 Residential Density

The POR proposed that numerical density ranges should be applied flexibly and that higher density may be appropriate on some strategic sites given their proximity to public transport and/or town centre locations, and the potential scale of development. This is an attempt to move away from treating density in a very mechanical way, and instead focus on the unacceptable outcomes for which a high density figure can be a symptom, e.g. lack of amenity space/internal space/car parking and excessive scale and bulk. Several developers and the NHS supported this approach. One resident insisted on a rigid application of the current numerical standards.

### 4.34 Enhancing Open Spaces

The POR proposed to group protected open spaces into two categories:

1. Local Green Spaces would include the best quality and most accessible spaces and would have a level of protection equivalent to Green Belt land.
2. Community Enhancement spaces would be those which could benefit from improvements to their quality and/or accessibility. In some cases they could be used to provide for an essential community facility.

4.35 There was a mixed response to this proposal. Some residents expressed concern that it could lead to wholesale loss of important open spaces. Others saw it as a logical response to balancing community priorities. A very large number of representations supported giving the “Evergreen” site in Wanstead the highest level of protection as Local Green Space, although some also wished the site to be opened up to a community use, which would be more difficult under the Local Green Space category.

4.36 The proposed approach only allows the loss of Community Use open space where it is justified by the need for a community facility such as a school. Apart from that limited opportunity, conversion of these open spaces to housing or commercial uses as some residents feared is not supported.

## 5. Going Forward

5.1 Analysis of the representations suggested that the basic framework and approach of the POR are sound, but that several additional pieces of work were required to shore up or reassess some detailed policy directions, before the final Pre-submission document is drafted:

- Further discussion is required with the Mayor of London and TfL, especially in relation to affordable housing targets and car parking standards. It is stressed here that the tone of the Mayor’s response to date has been conciliatory and that he appears to be seeking a constructive dialogue on these matters. Officers will be contacting the Mayor in due course to pursue this.
- The Pre-submission Local Plan (Core Strategy Review) will need to carefully explain the Council’s approach to meeting housing need. In particular, it must justify the shortfall in identified supply by explaining that the Council has done all it reasonably can do to find land for housing and that sustainable development requires this important priority to be balanced against other priorities such as the need to preserve open space and protect the character of established neighbourhoods. The results of the Mayor’s 2013 **Strategic Housing Land Availability Assessment** will be pivotal in demonstrating this.
- Officers have prepared an **addendum to the Green Belt Review** to assess a number of sites advanced by developers for possible release from the Green Belt for use as housing land (see Appendix A). This additional mini-review is important to show that the arguments advanced by developer representations have been seriously considered and to demonstrate that the Council is prepared to leave no stone unturned in seeking land which can provide a sustainable supply of housing.

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- **Transport modelling and assessment studies** will need to be carried out into some of the larger strategic sites proposed for development. In particular, several representations expressed concern about the impact on the local road network of developing the Oakfields site. While the final form of development at Oakfields is not known at this stage, the work should at least demonstrate the feasibility of taking the project forward.
- Related to the above work, **indicative masterplans** for Oakfields and the land in and around the King George and Goodmayes Hospitals will need to be prepared. These are both key Opportunity Sites and critical to the delivery of the Investment Areas proposed at Barkingside and the Crossrail Corridor. The intention would be to show in the Pre-submission Core Strategy the broad nature and scale of development which can be accommodated and to set the scene for more comprehensive work once the Core Strategy is adopted, with draft master plans submitted as evidence base items.
- At the suggestion of English Heritage, officers are undertaking a **Characterisation Study** to better understand what gives parts of the borough their special character and provide practical guidance in relation to such matters as the protection of heritage assets, the most appropriate locations for tall buildings or application of consistent architectural style.
- The NPPF stresses that the Council must ensure that the cumulative impact of all its policy proposals does not render the development it is seeking to encourage commercially unviable. A **viability assessment** was undertaken by BNP Paribas on behalf of the Council to support the Redbridge Community Infrastructure Levy charge in 2010. This work already covers much of the ground which would need to be covered for the Core Strategy and it is likely that it could be expanded and adapted to meet the NPPF requirements without the need for a whole new study.

5.2 With the exception of the traffic modelling work and viability assessment, all the above work can be delivered using in-house resources. In addition to the above:

- Officers are currently preparing a draft **Policies Map** (the Government's new name for the current Proposals Map) to illustrate how policies apply across the geographical area of the borough.
- The NPPF has rendered obsolete much of the rigid terminology of the LDF system and the Council now has flexibility to call its "Local Plan" anything it wants. Given that the plan must cover a 15 year period and is not likely to be finally adopted until 2015, it is suggested that an appropriate name for the revised Core Strategy would be "**Redbridge 2030**".

## 6. Timetable

- 6.1 Subject to the above work, the final Core Strategy Review will be drafted and published for pre-submission consultation following approval by LDF Advisory Committee, Cabinet and full Council.
- 6.2 Provided no major changes are deemed necessary following the consultation, the Core Strategy will then be submitted for independent examination by a Planning Inspector appointed by the Secretary of State.

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Following the examination the Inspector will publish a report. If the report finds the revised Core Strategy to be “sound”, the Council may then formally adopt it. The whole timetable is set out in the table below.

<b>Table 1: Timetable for Core Strategy Review</b>	
<b>Stage</b>	<b>Dates</b>
Background Research (Strategic Housing Land Availability Assessment, Strategic Housing Market Assessment, Open Space Assessment, Green Belt Review and Community Infrastructure Plan)	January 2009- February 2011
Early Stakeholder Engagement and Community Involvement setting out Issues	September- October 2011
Preparation of Preferred Options Report & Sustainability Appraisal (including approval by LDF Advisory Committee on 30 April 2012).	October 2011 – August 2012
Consideration of POR by Cabinet	November 2012
Publish Preferred Options Report and Sustainability Appraisal for consultation	January-February 2013
Preparation of pre-submission Core Strategy & Sustainability Appraisal	March-October 2013
Consideration by LDF Advisory Committee	October 2013
Consideration by Cabinet	November 2013
Consideration by Council	January 2014
Pre-Submission Core Strategy and Sustainability Appraisal published for consultation.	June-July 2014
Submit Core Strategy & Sustainability Appraisal to Secretary of State.	September 2014
Pre-Examination Meeting	October 2014
Examination Hearings	November-December 2014
Inspector’s report	February 2015
Adoption & publication by full Council	March 2015
Implementation and delivery	2015-2030

### 7. Finance comments of the Director of Finance and Resources

- 7.1 Members are asked to note and comment on this report and endorse the proposed approach for preparing the pre-submission document.
- 7.2 Costs associated with the various stages of the Core Strategy review including preparation of the Preferred Options Report have been met from existing approved budgetary resources, so there are no direct additional financial implications for Member consideration.
- 7.3 Issues identified in the Preferred Options Report will feed into the revised Core Strategy review. These issues may have a financial impact on the Council, eg in its role as a landowner through increased development, or as a service delivery outcome arising for example from the need for additional

school places. The full financial implications of these will be assessed as appropriate once the review is completed.

### **8. Comments of the Borough Solicitor and Secretary**

- 8.1 The Council's planning policy is set out in the Local Development Framework ('LDF') which is comprised of Local Development Documents ('LDD's').
- 8.2 The Core Strategy is the overarching document in the 'LDF' to which all other plans must relate. The preparation of the LDF is incorporated into a programme known as the Local Development Scheme which is the work programme for preparing and keeping under review LDD's such as the Core Strategy.
- 8.3 Section 26 of the Planning and Compulsory Purchase Act 2004 as amended by the Localism Act 2011 provides that the Council as local planning authority may at any time prepare a revision of a LDD which includes the Core Strategy.
- 8.4 Any review of the Core Strategy must satisfy the Consultation requirements as set out in the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2009.

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