

Sustainability Appraisal (SA) of the Redbridge Local Plan

SA Report Addendum

October 2017

REVISION SCHEDULE

Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	Oct 2017	SA Report Addendum published alongside proposed main modifications to the Redbridge Local Plan	Mark Fessey Principal Consultant	Steven Smith Technical Director	Steven Smith Technical Director

Limitations

AECOM Infrastructure & Environment UK Limited (AECOM) has prepared this Report for the sole use of the London Borough of Redbridge ("Client") in accordance with the terms and conditions of appointment. No other warranty, expressed or implied, is made as to the professional advice included in this Report or any other services provided by AECOM. This Report may not be relied upon by any other party without AECOM's prior and express written agreement.

Where any conclusions and recommendations contained in this Report are based upon information provided by others, it has been assumed that all relevant information has been provided by those parties and that such information is accurate. Any such information obtained by AECOM has not been independently verified by AECOM, unless otherwise stated in the Report.

AECOM Infrastructure & Environment UK Limited
 2 Leman Street, London E1 8FA
 Telephone: +44(0)20 7798 5000

TABLE OF CONTENTS

NON-TECHNICAL SUMMARY	1
1 INTRODUCTION	2
2 SCREENING PROPOSED MODIFICATIONS	4
3 APPRAISING PROPOSED MODIFICATIONS	8
4 CONCLUSIONS	23
5 NEXT STEPS	24

NON-TECHNICAL SUMMARY

Introduction

On 3 March 2017, the London Borough of Redbridge ('the Council') submitted the Redbridge Local Plan (RLP) and supporting documents to the Secretary of State for independent examination by a Government appointed Planning Inspector. Examination hearings were held between 6th June and 20th July 2017, subsequent to which the Inspector wrote to the Council, providing 'post hearing advice'. Following receipt of post hearing advice, the Council prepared a list of proposed modifications to the submitted plan, and agreed these with the Planning Inspector. These proposed modifications are now published for consultation.

The aim of this SA Report Addendum is essentially to present an appraisal of the proposed modifications, with a view to informing the current consultation.

Appraising proposed modifications

The main task is to appraise proposed modifications against the SA framework, and also discuss the 'submission plan plus proposed modifications' (thereby updating the SA Report).

The appraisal is structured under 15 sustainability topic headings, with the following overall conclusion -

The proposal to remove the Oakfield and Ford Sports Ground Opportunity Sites, and thereby follow a lower housing growth strategy (exceeding the London Plan housing target by 2%), is supported in terms of 'Health' objectives in particular, as the result will be confidence regarding the capacity of sports pitch provision in the Borough. The proposal has positive implications for a range of specific groups, including the South Asian community (South Asian League cricket is growing and currently accounts for at least 35% of the cricket playing population); and, more broadly, is supportive of work to promote social cohesion and inclusion, such as the significant Inter Faith work being undertaken by Essex Cricket in Redbridge. As such, the proposal has positive implications from an Equalities perspective.

However, the proposal has drawbacks in terms of other objectives, with higher housing growth supported in terms of 'Housing' and (to a lesser extent) 'Economy' objectives. Both sites are suitable for development in some respects. Notably, Oakfield benefits from proximity to Barkingside District Centre, Fairlop underground station, leisure facilities, and open space at Fairlop Country Park. It is also the case that both sites would have delivered new community infrastructure, to include two new secondary schools and a health facility; however, there is little reason to suggest that removing these sites from the strategy will lead to a shortfall in infrastructure capacity. This is particularly the case given the proposal to strengthen site specific and development management policy relating to infrastructure delivery.

Another important matter is the proposal to adjust the housing density/yield at various Opportunity Sites, and in turn adjust the amount of employment and retail supported, following the Council's "Review of Appendix 1: Development Opportunity Sites" (LBR 2.06). Most notable are the proposals to: A) decrease housing units / increase retail floorspace within Ilford Town Centre; and B) increase housing units / decrease employment floorspace within the Crossrail Corridor. The changes in housing numbers / floorspace respond to the re-assessment of all individual site capacities and fuller consideration of non-residential uses. As such, it is difficult to conclude on strategic implications for sustainability objectives. The decrease in employment floorspace is notable; however, any concerns are somewhat allayed by the proposal to bolster Policy LP14 (Stimulating Business and the Local Economy). The effect of proposed modifications to LP1 (Spatial Development Strategy) will be to support 1,125 additional jobs overall (albeit reduced jobs are supported in the Crossrail Corridor and Barkingside Investment and Growth Areas), despite the reduced area of employment floorspace.¹

Next steps

The next step is for the Inspector to consider the representations raised as part of the consultation, alongside this SA Report Addendum, before deciding whether he is in a position to conclude on the Plan's soundness.

¹ 1,600 additional jobs are supported across the Ilford, Gants Hill and South Woodford Investment and Growth Areas, whilst 475 fewer jobs are supported across Crossrail Corridor and Barkingside. As such, there is net support for an additional 1,125 jobs.

1 INTRODUCTION

1.1 Background

1.1.1 On 3 March 2017, the London Borough of Redbridge ('the Council') submitted the Redbridge Local Plan (RLP) and supporting documents to the Secretary of State for independent examination by a Government appointed Planning Inspector. One of the associated documents submitted alongside the Plan was the Sustainability Appraisal (SA) Report (2016; LBR 1.11) and a non-technical summary of that report (LBR 1.11.1). An Interim SA Report (2017; LBR 1.11.2) was also submitted, presenting supplementary information on a specific matter.²

1.1.2 Examination hearings were held between 6th June and 20th July 2017, subsequent to which the Inspector wrote to the Council, providing 'post hearing advice' in two parts -

- Post Hearing Advice: Part 1 (IED011) - provided advice in respect of "certain individual policies within the RLP".
- Post Hearing Advice: Part 2 (IED012) - dealt with two Green Belt 'Opportunity Sites' proposed for allocation by the Local Plan; namely Oakfield and Ford Sports Grounds. The Inspector stated -

"From the evidence provided I am not satisfied that there are exceptional circumstances to warrant altering the Green Belt boundary so as to allocate these sites as Opportunity Sites. As part of this finding my view is that it has not been demonstrated that playing pitch provision would meet estimated demand across the Borough in 2030 if Oakfield and Ford were developed. Overall this part of the plan would not achieve sustainable development and so is potentially unsound... My advice is therefore that the Council includes main modifications to omit Oakfield and Ford Sports Ground as Opportunity Sites in the RLP."

1.1.3 Following receipt of post hearing advice, the Council prepared a list of proposed main modifications (henceforth *proposed modifications*)³ to the submitted plan, and agreed these with the Planning Inspector. Proposed modifications are now published for consultation.

1.2 This SA Report Addendum

1.2.1 The aim of this SA Report Addendum is essentially to present an appraisal of the proposed modifications, with a view to informing the current consultation.

1.2.2 In addition to presenting an appraisal of the proposed modifications, this report presents an appraisal of the 'the Plan as modified', thereby updating the appraisal findings presented within the SA Report (LBR 1.11).

1.2.3 It is important to emphasise that this is an *addendum* to the SA Report (LBR 1.11), and hence the two should be read together.

² The Interim SA Report (2017) presented information on 'reasonable spatial strategy alternatives'. Specifically, the report updated the information presented within the SA Report, in light of representations received on the Proposed Submission Plan / SA Report through consultation in 2016. In particular, there was a need to consider the implications of the consultation response received from the Greater London Authority, on behalf of the Mayor of London.

³ As well as proposed *main* modifications, the Council has also prepared a list of proposed *additional* modifications; however, proposed additional modifications need not be a focus of SA, as by their very nature there is no potential for significant effects.

Reasonable alternatives?

- 1.2.4 As required by Regulations,⁴ the SA Report (2016) presented detailed information on reasonable alternatives, with supplementary information then presented within the Interim SA Report 2017. Specifically, the two reports presented information on reasonable alternative approaches to housing growth, or 'spatial strategy alternatives'. The need for supplementary information within the Interim SA Report was generated by representations received on the Proposed Submission Plan / SA Report. Essentially the representations led the Council to reconsider the spatial strategy alternatives that might be considered 'reasonable', which in turn led to a need for further appraisal work.
- 1.2.5 When developing proposed modifications the Council (working with the Inspector) was not presented with a need to appraise alternatives, given: A) alternatives appraisal work completed prior to submission; and B) understanding generated through the Examination, as reflected within the Inspector's post hearing advice notes (IED011/12).
- 1.2.6 In particular, the Council was not presented with a need to re-appraise spatial strategy alternatives. Whilst alternatives to the approach advised by the Inspector's 'Part 2' post submission advice note - namely removal of the Oakfield and Ford Sports Grounds Opportunity Sites from the RLP - can be envisaged, there is little reason to identify any alternative strategy as 'reasonable' and hence warranting detailed examination. This conclusion is reached on the basis of paragraph 7 within the inspector's note, which states -
- "It will be for the Council to consider further the implications of removing both sites. However, in terms of housing supply the figure of 17,237... would exceed the minimum target in Policy LP2. Some secondary school provision could be made at the other strategic sites and is required at the end of the plan period in any event. An alternative exists for the health care provision proposed at Oakfield. Therefore if the deletion of these sites were put forward in isolation this would not necessarily render the RLP as a whole unsound."*
- 1.2.7 As such, this report does not contain information on alternatives. There are two final points to note -
- As part of the appraisal of proposed modifications presented below (Chapter 3), consideration is given to how the new proposed spatial strategy (17,237 homes including two Green Belt Opportunity Sites) performs relative to the submission spatial strategy (18,937 homes including four Green Belt Opportunity Sites). As such, it can be said that these two strategies are examined as alternatives.
 - At the time of Plan adoption an 'SA Statement' will be published that explains how the Plan (as modified) is justified on the basis of alternatives appraisal.

⁴ The Environmental Assessment of Plans and Programmes Regulations (2004) require that the SA Report present an appraisal of 'reasonable alternatives' and also 'an outline of the reasons for selecting the alternatives dealt with'.

2 SCREENING PROPOSED MODIFICATIONS

2.1 Introduction

2.1.1 The first task is to consider proposed modifications in turn, with a view to identifying those that need to be given detailed consideration, through appraisal (see Chapter 3), on the basis that the modification has the potential to give rise to a significant effect.

2.1.2 This chapter firstly gives consideration to proposed modifications to Policy LP1 (Spatial Development Strategy), before then giving consideration to proposed modifications to other, thematic / development management type policies. Policies not referenced in the discussion below are those that are ‘screened-out’ on the basis that they are likely to have limited substantive implications, and in turn not likely to lead to significant effects, either alone or in combination.

2.2 Proposed modifications to Policy LP1 (Spatial Development Strategy)

2.2.1 The majority of the first 22 proposed modifications deal with changes to the spatial strategy, with the key proposed changes relating to either: A) the proposal to remove two Opportunity Sites (Oakfield and Ford Sports Ground), in-line with the Inspector’s ‘Part 2’ advice (see above); or B) the proposal to adjust the housing density/yield at various Opportunity Sites, and in turn adjust the amount of employment and retail supported, following the Council’s “Review of Appendix 1: Development Opportunity Sites” (LBR 2.06). See Table 2.1.

Table 2.1: Summary of changes to the spatial strategy

Investment and growth area	Homes	Empoym’t (m ₂)	Jobs	Retail (m ²)
Ilford	-700 [through accommodating mixed use]	-1,000	+1,000	+15,000
Crossrail Corridor	+150 [-850 through loss of Ford Sport Ground; +1,000 at remaining sites through some higher density & accommodating mixed use]	-12,700	-400	+5,000
Gants Hill	No change	-7,400	+100	+3,000
South Woodford	-220 [through accommodating employment]	+1,100	+500	+1,500
Barkingside	-900 [- 600 through lossof Oakfield and then - 300 at remaining sites through accommodating mixed use]	-5,000	-75	-3,000
Total	-1,670 [-1,450 through loss of Oakfield and Ford; and -220 at remaining sites through accommodating mixed use]	-25,000	+1,125	+21,500

2.2.2 Screened-in proposed modifications are discussed in turn below, by area/policy.

Ilford Investment and Growth Area (LP1A)

- MM5 - the proposal is to reduce the number of new homes (6,000 to 5,300) and increase the amount of new retail floorspace (15,000 to 30,000 sq.m).

N.B. To reiterate the point made above (2.2.1), these changes are a result of work completed to examine the number of homes, and supporting uses, to be delivered at each of the Opportunity Sites listed in Appendix 1 of the plan, as explained in document LBR2.06. The changes are not as a result of any change to the list of Opportunity Sites.

There is also added reference to “*a new health hub in Ilford Town Centre, delivery of a new Cultural Quarter in Ilford Town Centre including civic, leisure and retail uses.*” These changes aim to summarise and emphasise site specific requirements listed in Appendix 1 (Opportunity Sites) and Appendix 2 (Infrastructure Delivery Plan). The changes do not reflect any new infrastructure proposals.

LP1B: Crossrail Corridor Investment and Growth Area

- MM6 - the proposal is to increase the number of new homes (4,700 to 4,850), increase the amount of new retail floorspace (15,000 to 20,000 sq.m) and decrease the amount of new employment floorspace (20,000 to 7,300 sq.m). These changes are a result of: A) the proposal to remove the Ford Sports Ground Opportunity Site; and B) the Appendix 1 Review (as discussed above).

The proposal is also to delete text dealing with employment from the supporting text (paras 3.4.10 & 3.4.11). The aim is to reflect an emphasis on protecting the Borough’s better quality employment land, and securing the provision of a minimum 21,206m² of new fit for purpose employment spaces that align with modern working practices as part of mixed use developments. These modifications are consequential to reflect changes to policy LP14 (Stimulating Business and the Local Economy; see discussion below).

- Furthermore -
 - MM7 - proposes changes to policy wording for King George and Goodmayes Hospitals Opportunity Site, e.g. relating to infrastructure requirements.
 - MM8 - proposes deletion of policy for Ford Sports Ground Opportunity Site.
 - MM9 - proposes changes to policy wording for Billet Road Opportunity Site, e.g. relating infrastructure requirements.

LP1C: Gants Hill Investment and Growth Area

- MM10 - the proposal is to increase the amount of new retail floorspace (5,000 to 8,000 sq.m) and decrease the amount of new employment floorspace (10,000 to 2,600 sq.m).

LP1D: South Woodford Investment and Growth Area

- MM11 - the proposal is to decrease the number of new homes (650 to 430), increase the amount of new retail floorspace (2,000 to 3,500 sq.m) and increase the amount of new employment floorspace (5,000 to 6,100 sq.m).

There is also supplementary reference within supporting text to specific infrastructure proposals including “*investment in South Woodford Health Centre and redevelopment of Wanstead Hospital as a locality hub.*” Again, these changes aim to summarise and emphasise site specific requirements listed in Appendix 1 (Opportunity Sites) and Appendix 2 (Infrastructure Delivery Plan).

- Furthermore -
 - MM12 - expands significantly on the vision for South Woodford, including with reference to its character and heritage.
 - MM13 - removes reference to one of the proposed Opportunity Sites having the potential to deliver a ‘landmark building’.

LP1E: Barkingside Investment and Growth Area

- MM11 - the proposal is to decrease the number of new homes (1,400 to 500), new retail floorspace (5,000 to 2,000 sq.m) and new employment floorspace (2,000 to nil).

There is also supplementary reference within supporting text to specific infrastructure proposals including: *“Redevelopment and modernisation of Fullwell Cross Health Centre.”*

- MM16 and MM17 proposes deletion of the policy dealing with Oakfield Opportunity Site.

Other substantive changes

- MM3 and MM4 - deal with changes to early supporting text, proposing supplementary references to the importance of character, design and heritage conservation.
- MM18 - deals with Policy LP2 (Delivering Housing Growth), proposing increased support for infill development on previously developed land, subject to criteria.
- MM22 - also deals with Policy LP2 (Delivering Housing Growth), clarifying that the number of homes assigned to each Opportunity Site is not a cap; however, equally development *“should nevertheless be consistent with the context and the character of the surrounding area and otherwise cause no unacceptable adverse effects.”*

2.3 Proposed modifications to thematic policies

2.3.1 Proposed modifications are proposed to the majority of thematic policies, and in the majority of cases the changes are substantive, i.e. could feasibly have some bearing on the achievement of SA objectives. However, in the great majority of cases, the effect of proposed changes will be very minor. Through discussion, the Council and AECOM determined a need to focus upon proposed changes to the following policies -

- Affordable Housing (LP3; MM23 and MM24) - an increase in the affordable housing target from 30% to 35% (in line with the Mayor’s representation and evidence set out in the Viability Study).
- Specialist Accommodation (LP4; MM25 and MM26) - the addition of criteria to determine proposals for student accommodation.
- Dwelling Mix (LP5; MM27) - insertion of an expectation that Green Belt release sites provide a high proportion of family sized homes.
- Managing Town Centre & Retail Uses (LP10; MM32) - a reduction in the targeted percentage of retail uses in secondary frontages – from 50% to 40%, and greater flexibility in all retail frontages where existing units have been long term vacant, and proposals offer regeneration benefits.
- Managing Clustering of Town Centre Uses (LP11; MM33) - amendments to policies controlling the proliferation of hot food takeaways, betting shops, money lenders and shisha bars – including removal of 5% thresholds for hot food takeaways. The criterion that takeaways will be resisted within 400m of a school remains. The policy now groups betting shops, money lenders and shisha bars together as ‘sui generis’ uses and requires each new use to be separated from any existing sui generis unit or group of units by at least two non sui generis units.
- Stimulating Business and the Local Economy (LP14; MM35) - strengthening of proposals for the protection of designated, and provision of new, employment space, and the introduction of criteria for live/ work units.
- Delivering Community Infrastructure (LP17; MM37) - strengthening of policy to ensure that new development is accompanied by proposals for the provision of the community infrastructure required to meet the needs arising from that development.
- Health and Well-Being (LP18; MM40) - major developments must submit a Health Impact Assessment (HIA).

- Cycle and Car Parking (LP23; MM48) - aligning parking standards with the London Plan.
- Water and Flooding (LP21; MM44 and 45) - strengthening of criteria relating to flood risk.
- Pollution (LP24; MM50) - require air quality assessments for development of 10 or more new homes.
- Telecommunications (LP25; MM51) - introduction of a commitment to digital infrastructure particularly to support economic growth in the Investment and Growth Areas.
- Tall Buildings (LP27; MM53 and MM54) - reinforcing the use of tall building zones.
- Amenity and Internal Space Standards (LP29; MM56) - amendments to amenity space standards to align with local benchmarks.
- Protecting and Enhancing Open Spaces (LP35; MM62 and 63) - clarification of approach to open space provision in areas of existing deficiency.
- Nature Conservation and Biodiversity (LP39; MM67 to MM69) - strengthened references to biodiversity considerations, including additional detail on the approach to assessing impact of development on Epping Forest Special Area of Character.

3 APPRAISING PROPOSED MODIFICATIONS

- 3.1.1 This chapter presents an appraisal of the screened-in proposed modifications, and also discusses the ‘submission plan plus proposed modifications’ (thereby updating Chapter 10 “Appraisal of the Proposed Submission Plan” of the SA Report).
- 3.1.2 The appraisal is structured under the 15 sustainability topics identified through SA scoping (and used to structure the appraisal findings within the SA Report).⁵

3.2 Poverty

Reduce poverty and social exclusion

Appraisal of proposed modifications

- 3.2.1 The proposal to remove the Oakfield and Ford Sports Ground Opportunity Sites, will result in the loss of **education** (two secondary schools) and **health** (Oakfield Locality Hub) facilities, which potentially has negative implications for ‘Poverty’ objectives. However, conversely, retainment of **sports pitches** potentially has positive implications. Taking each of these three matters in turn -

- Secondary school capacity - whilst there may be some risk, there is little certainty regarding the likelihood of a shortfall in school places. Pupil place planning is inherently dynamic, and the Council’s annual update on Pupil Place Projections will trigger when specific education infrastructure is required, thereby ensuring infrastructure is aligned with demand. These updates are reported to Cabinet on an annual basis, allowing ongoing monitoring and review to take place. Removal of two schools from the strategy creates some risk of a shortfall; however, the risk arises late in the plan period (Oakfield was only proposed for delivery post 2026), by which time additional capacity could well have been identified. For example, expanding existing secondary schools may absorb some future need and/or it might transpire that one or both of the eight form entry schools proposed at the King George and Goodmayes Hospital and Billet Road Opportunity Sites could deliver additional capacity, e.g. deliver a ten form entry school. As stated within the Inspector’s ‘Part 2’ advice note: *“Some secondary school provision could be made at the other strategic sites and is required at the end of the plan period in any event.”*
- Health facilities - as explained within the Inspector’s ‘Part 2’ advice note: *“An alternative exists for the health care provision proposed at Oakfield.”* Specifically, the Inspector is referring to the potential for redevelopment of Fullwell Cross Medical Centre, as an alternative to a new health facility at Oakfield. The Inspector reached this conclusion in light of the Redbridge Primary Care Infrastructure Capacity Plan (March, 2017),⁶ which concluded a requirement for: *“Redevelopment of Fullwell Cross or alternative health centre on the Oakfield site [emphasis added].”* However, it is noted that there is some uncertainty, with the Primary Care Infrastructure Capacity Plan elsewhere (5.3.1) referring to a new facility at Oakfield “and/or” redevelopment of the existing Fullwell Cross facility. The Primary Care Infrastructure Capacity Plan provides the following context -

“Fullwell Cross Health Centre (in the Fullwell ward) is adjacent to the major growth around Barkingside at the Oakfield playing fields. The current building is a single storey old health centre with 13 clinical rooms. The GP practice operating from Fullwell Cross has requested the building be extended as they are struggling to deliver services within the current space available... The Fullwell Cross Health Centre site has been identified by the CCG as a potential locality hub as it is in a central location close to growth areas. Investigations will be need to determine whether the current site could be redeveloped or whether a new health centre on the proposed Oakfield site is required.”

⁵ Scoping is the first stage in the SA process.

⁶ See <https://www.redbridge.gov.uk/media/3312/lbr-222-redbridge-primary-care-capacity-plan-march-2017.pdf>

It is noted that redevelopment of Fullwell Cross Medical Centre was a proposal within the Submission Plan, i.e. it is not the case that its redevelopment is being proposed through proposed modifications, in response to loss of Oakfield. However, proposed modifications do include some degree of increased support for an extensive redevelopment, with MM15 referring to a need for 'redevelopment and modernisation'.

- Sports pitches - as explained within the Inspector's 'Part 2' advice note: "... *it has not been demonstrated that playing pitch provision would meet estimated demand across the Borough in 2030 if Oakfield and Ford were developed.*" Two key documents submitted to the Examination on this matter are: 1) an analysis of playing pitch provision surplus / deficiency under different scenarios (completed by the Council; CED050);⁷ and 2) a response to CED050 prepared by Sport England (CED055).⁸ The scenarios examined were: i. Oakfield and Ford Sports Ground are not developed for housing; ii. Only Oakfield is developed for housing; iii. Only Ford Sports Ground is developed for housing; and iv. Both Oakfield and Ford Sports Ground are developed for housing. The conclusion initially reached by the Council (CED050) was that under all scenarios there would be sufficient playing pitch provision to meet demand in 2030, on the assumption that certain actions are implemented. However, Sport England strongly contradicted this finding, concluding: "*There is a real risk that scenarios 2, 3 and 4 could compromise the future of participation in playing, volunteering and managing organised football and cricket in Redbridge and beyond... Sport England maintain that both Oakfield Playing Field and Ford Sports Ground should be retained to deliver the borough's playing pitch, and more informal, health and recreation needs.*" Sport England raise a number of more detailed points in their submission (CED055), including -
 - Scenarios 2, 3 or 4 give rise to particular concerns in relation to football, which would appear to have a deficit.
 - There are uncertainties in respect of capacity to support South Asian League cricket, which is growing and currently accounts for at least 35% of the cricket playing population according to the English Cricket Board.
 - There is a risk that clubs would be detrimentally affected by moving, and possibly having to be split between sites. Sport England describes the expectation of considerable movement between sites as potentially not practical.
 - A reliance on moving pitches/clubs around the Borough, and undertaking extensive quality improvements (which then have to be maintained), will mean a heavy reliance on budgets, which might not be ring-fenced.
 - Playing pitch provision should be considered under the scrutiny of the Playing Pitch Strategy (PPS) steering group. The Council's work has involved consultation with only one user of Oakfield playing fields (Old Parkonians Association, and in particular the football club) who's needs may differ from other users.
 - Whilst work has focused on playing pitches, Sport England highlight that playing pitches only form a part of playing fields which provide a greater role in the health and wellbeing of a community since they provide for informal as well as formal sport and recreation. The Governments' (Sporting Future: A New Strategy for an Active Nation) and Sport England's (Towards an Active Nation) strategies recognise the importance of more informal forms of sport in addition to formal sports. Playing fields have a significant role in providing opportunities for a community to participate in such activities in addition to the benefits sport has on social cohesion and inclusion, such as the significant Inter Faith work being undertaken by Essex Cricket in Redbridge.

⁷ See <https://www.redbridge.gov.uk/media/3950/ced050-playing-pitch-provision-in-different-scenarios-web.pdf>

⁸ See <https://www.redbridge.gov.uk/media/4055/ced055-sport-england-comments-on-ced050.pdf>

- 3.2.2 Other spatial strategy related proposed modifications potentially have some minor positive implications for 'Poverty' objectives. Most notably, MM9 proposes some additional site specific requirements to guide development of the Billet Road site, clarifying that development must deliver a secondary school, affordable and family housing and 'enhanced open space'. Billet Road is located adjacent to the Marks Gate Estate, in neighbouring LB Barking and Dagenham, which is an identified regeneration priority area, with a cluster of development sites allocated by the Barking and Dagenham Site Specific Allocations Plan (2010) under the banner of 'Marks Gate Regeneration Sites'. The lower super output area (LSOA) adjacent to the Billet Road site is the tenth most deprived in LB Barking and Dagenham, according to the Indices of Multiple Deprivation (2015) dataset, out of 110 LSOAs in the Borough.
- 3.2.3 Finally, in respect of the spatial strategy, there is a need to consider the implications of the proposal to adjust the housing density/yield at various Opportunity Sites, and in turn adjust the amount of employment and retail supported, following the Council's "Review of Appendix 1: Development Opportunity Sites" (LBR 2.06). Most notable are the proposals to: A) decrease housing units / increase retail floorspace within Ilford Town Centre; and B) increase housing units / decrease employment floorspace within the Crossrail Corridor. The changes in housing numbers / floorspace respond to the re-assessment of all individual site capacities and fuller consideration of non-residential uses. As such, it is difficult to conclude on strategic implications for 'Poverty' objectives. The decrease in employment floorspace is notable; however, any concerns are somewhat allayed by the proposal to bolster Policy LP14 (Stimulating Business and the Local Economy). The effect of proposed modifications to LP1 (Spatial Development Strategy) will be to support 1,125 additional jobs overall (albeit reduced jobs are supported in the Crossrail Corridor and Barking Investment and Growth Areas), despite the reduced area of employment floorspace.⁹
- 3.2.4 With regards to proposed changes to thematic policy, the following all have notable positive implications for the achievement of 'Poverty' objectives -
- Affordable Housing (LP3; MM23 and MM24) - an increase in the affordable housing target from 30% to 35% (in line with the Mayor's representation and evidence set out in the Viability Study).
 - Dwelling Mix (LP5; MM27) - insertion of an expectation that Green Belt release sites provide a high proportion of family sized homes.
 - Managing Town Centre & Retail Uses (LP10; MM32) - a reduction in the targeted percentage of retail uses in secondary frontages – from 50% to 40%, and greater flexibility in all retail frontages where existing units have been long term vacant, and proposals offer regeneration benefits.
 - Stimulating Business and the Local Economy (LP14; MM35) - strengthening of proposals for the protection of designated, and provision of new, employment space, and the introduction of criteria for live/ work units.
 - Delivering Community Infrastructure (LP17; MM37) - strengthening of policy to ensure that new development is accompanied by proposals for the provision of the community infrastructure required to meet the needs arising from that development.

Appraisal of the submission plan plus proposed modifications

- 3.2.5 The SA Report concluded -

"The approach of targeting investment on specific areas and corridors within the Borough is likely to be the most appropriate way to support regeneration and tackle poverty and social exclusion. The plan is likely to result in positive effects; however, significant effects are unlikely."

⁹ 1,600 additional jobs are supported across the Ilford, Gants Hill and South Woodford Investment and Growth Areas, whilst 475 fewer jobs are supported across Crossrail Corridor and Barking. As such, there is net support for an additional 1,125 jobs.

- 3.2.6 This conclusion broadly holds true for ‘the submission plan plus proposed modifications’. There is still a focus of growth within Investment and Growth Areas, albeit adjustments are proposed (see discussion at para 3.2.3, above). Furthermore, the modifications will strengthen site specific and development management policy focused on infrastructure delivery, and there is also explicit support for changes of use in retail frontages where the effect will be to support regeneration.
- 3.2.7 The proposal to retain existing playing pitches at Oakfield and Ford Sports Ground has positive implications for a range of specific groups, including the South Asian community (see para 3.2.1); and, more broadly, is supportive of work to bring about social cohesion and inclusion, such as the significant Inter Faith work being undertaken Essex Cricket in Redbridge. As such, the proposal has positive implications from an Equalities perspective.

3.3 Crime

Reduce and prevent crime and the fear of crime

Appraisal of proposed modifications

- 3.3.1 The proposal to remove the Oakfield and Ford Sports Ground Opportunity Sites potentially has implications for ‘Poverty’ objectives, as discussed above (para 3.2.1); however, there is little reason to suggest the potential for any resulting effects in terms of ‘Crime’.
- 3.3.2 Other spatial strategy related proposed modifications have limited implications for ‘Crime’ objectives. Adjustments to density / building heights and the mix of uses at Opportunity Sites could have implications for townscape, character and design objectives; however, crime implications are not clear.
- 3.3.3 With regards to proposed changes to thematic policy, there will generally be limited implications for ‘Crime’ objectives, although MM32, which deals with LP10 (Managing Town Centre & Retail Uses) is of note. The proposal is a reduction in the targeted percentage of retail uses in secondary frontages – from 50% to 40% - and greater flexibility in all retail frontages where units have been long term vacant, and proposals offer regeneration benefits.

Appraisal of the submission plan plus proposed modifications

- 3.3.4 The SA Report concluded -

“The plan should help to reduce crime through support for town centre regeneration; however, significant effects are unlikely. Design policies also set out requirements for design of new developments which are likely to again have positive but minor effects in terms of crime reduction. It is recommended that design policy LP26 ‘Promoting High Quality Design’ is strengthened further by stating design measures which would be expected to be undertaken.”
- 3.3.5 This conclusion broadly holds true for ‘the submission plan plus proposed modifications’.

3.4 Housing

Meet local housing needs by ensuring that everyone has the opportunity to live in a decent, affordable home

Appraisal of proposed modifications

- 3.4.1 The proposal to remove the Oakfield and Ford Sports Ground Opportunity Sites means that the plan will not be providing for as many new homes as would otherwise be the case; however, the plan will still be providing for 17,237 over the plan period, which is a figure 2% above the London Plan target for the borough. Proposed modifications mean that the proposal is now to provide for 54% of the Objectively Assessed Housing Need figure established by the Strategic Housing Market Assessment (SHMA, 2016).

- 3.4.2 Loss of the two large Opportunity Sites could also have implications for delivering the desired housing mix, recognising that these sites would have been suited to delivering larger, family houses, for which there is an established need locally, and recognising that equivalent opportunities elsewhere in the borough are limited. As larger sites, it may also be fair to assume that there would be good potential to deliver the full quota of affordable housing. All sites are expected to deliver at least 35% affordable housing; however, viability can have a bearing on delivery in practice.
- 3.4.3 Other spatial strategy related proposed modifications also have implications for ‘Housing’ objectives. In particular, the proposal is to add a new requirement to deliver ‘family housing’ at both the King George and Goodmayes Hospitals and Billet Road Opportunity Sites.
- 3.4.4 With regards to proposed changes to thematic policy, the following all have notable positive implications for the achievement of ‘Housing’ objectives -
- Affordable Housing (LP3; MM23 and MM24) - an increase in the affordable housing target from 30% to 35% (in line with the Mayor’s representation and evidence set out in the Viability Study).
 - Specialist Accommodation (LP4; MM25 and MM26) - the addition of criteria to determine proposals for student accommodation. Notable criteria include: “(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...*”
 - Dwelling Mix (LP5; MM27) - insertion of an expectation that Green Belt release sites provide a high proportion of family sized homes.
 - Gypsy and Travellers (LP8; MM30) – modifications to ensure a policy approach aligned to national policy, for example clarifying that sites should not be located in the Green Belt, unless there are ‘very special circumstances’.
 - Amenity and Internal Space Standards (LP29; MM56) - amendments to amenity space standards to align with local benchmarks.

Appraisal of the submission plan plus proposed modifications

- 3.4.5 The SA Report concluded -
- “The plan is set to provide for the London Plan target, but fall short of the number identified by the Outer North East London SHMA, potentially contributing to unmet need. As such, there is a need to conclude uncertain effects. The plan is highly supportive of a housing mix to meet identified needs, and will help to ensure the quality of housing; however, these are secondary considerations.”*
- 3.4.6 This conclusion broadly holds true for ‘the submission plan plus proposed modifications’. There is a need to temper the statement on housing mix somewhat, recognising the proposal to remove two Green Belt release sites from the strategy; however, on the plus side, the proposal is to bolster Policy LP5 (Dwelling Mix) with insertion of an expectation that Green Belt release sites provide a high proportion of family sized homes. The proposed increase in the affordable housing target, from 30% to 35%, is also supported.

3.5 Education

Improve the education and skill of the population overall

Appraisal of proposed modifications

- 3.5.1 The proposal to remove the Oakfield and Ford Sports Ground Opportunity Sites, has direct implications for ‘Education’ objectives, on the basis that both sites would deliver new secondary schools. See discussion above, within Section 3.2 (‘Poverty’).

- 3.5.2 Other spatial strategy related proposed modifications also have implications for ‘Education’ objectives. In particular, the proposal (MM2 and MM4) is for site specific policy at the Billet Road and King George and Goodmayes Hospitals Opportunity Sites to explicitly require delivery of a secondary school.
- 3.5.3 It is also noted that the proposal is to: A) remove the requirement to deliver a primary school at the King George and Goodmayes Hospitals Opportunity Site; but B) emphasise the importance of delivering new primary schools at two Opportunity Sites in Ilford Investment and Growth Area (LP1A) and at one site in the Crossrail Corridor Investment and Growth Area (LP1B).
- 3.5.4 With regards to proposed changes to thematic policy, the most notable change is the proposal to bolster Policy LP17 (Delivering Community Infrastructure), with additional wording to ensure that new development is accompanied by proposals for the provision of the community infrastructure required to meet the needs arising from that development.

Appraisal of the submission plan plus proposed modifications

- 3.5.5 The SA Report concluded -

“Policy LP1 ‘Spatial Development Strategy’ has implications for access to school places, with the strategy aimed at addressing existing issues and ensuring capacity to cope with population growth. Additionally, Policy LP16 ‘Skills and Training’ seeks to facilitate training opportunities for local residents. The plan is likely to result in positive effects; however, significant effects are unlikely.”
- 3.5.6 This conclusion broadly holds true for ‘the submission plan plus proposed modifications’. The proposed spatial strategy is now supportive of fewer new secondary schools; however, there is little reason to suggest that there will be insufficient capacity at any point over the plan period. This is particularly the case recognising that MM2 and MM4 propose strengthening of Policy LP1 to ensure that development proposals on the Plan’s identified Opportunity Sites deliver the proposed uses (new homes and any other non-residential floorspace) and the identified social infrastructure. Also, the proposal is to bolster Policy LP17 (Delivering Community Infrastructure).

3.6 Services

Provide accessible community services and leisure opportunities

Appraisal of proposed modifications

- 3.6.1 The proposal to remove the Oakfield and Ford Sports Ground Opportunity Sites, has direct implications for ‘Services’ objectives, on the basis that both sites would deliver new services/facilities. See discussion above, within Section 3.2 (‘Poverty’).
- 3.6.2 It is also important to note that Oakfield performs well as a site for housing in the sense that it is located in proximity to Barkingside District Centre, Fairlop Underground Station, leisure facilities at Redbridge Sports Centre, and open space at Fairlop Country Park. More generally, development might be seen as broadly in accordance with the Council’s ambitions to develop Barkingside as a District Centre. Also, the existing Redbridge Sports Centre is an important local facility and redevelopment could offer the potential to improve and enhance it to create a sub regionally important facility.
- 3.6.3 With regards to proposed changes to thematic policy, the following all have notable positive implications for the achievement of ‘Services’ objectives -
 - Managing Town Centre & Retail Uses (LP10; MM32) - a reduction in the targeted percentage of retail uses in secondary frontages – from 50% to 40%, and greater flexibility in all retail frontages where existing units have been long term vacant, and proposals offer regeneration benefits.

- Delivering Community Infrastructure (LP17; MM37) - strengthening of policy to ensure that new development is accompanied by proposals for the provision of the community infrastructure required to meet the needs arising from that development.

Appraisal of the submission plan plus proposed modifications

3.6.4 The SA Report concluded -

“Overall the Plan shows many policies that address service provision, enhancement and accessibility in Redbridge. The five Growth and Investment Areas proposed in the Plan are all situated in areas that currently have, or will have in the near future, a selection of transport links (e.g. cycle, walking and rail/tube) that make community services accessible to residents in Redbridge. Emphasis is also given by the Plan to providing sufficient community infrastructure and transport networks for town centres and green/open spaces for all. Finally, the Plan ensures that the Council will utilise the Community Infrastructure Levy (CIL) and seek developer contributions towards the provision of new social infrastructure in the borough. The plan should lead to positive effects; however, significant effects are unlikely.”

3.6.5 This conclusion broadly holds true for ‘the submission plan plus proposed modifications’. There is a need to temper the conclusion of positive effects somewhat, due to the proposal to remove two large greenfield opportunity sites, each of which would deliver new strategic services/facilities; however, there is little reason to suggest that there will be insufficient capacity at any point over the plan period. This is particularly the case recognising that MM2 and MM4 propose strengthening of Policy LP1 to ensure that development proposals on the Plan’s identified Opportunity Sites deliver the proposed uses (new homes and any other non-residential floorspace) and the identified social infrastructure set out for each site. Also, the proposal is to bolster Policy LP17 (Delivering Community Infrastructure).

3.7 Health

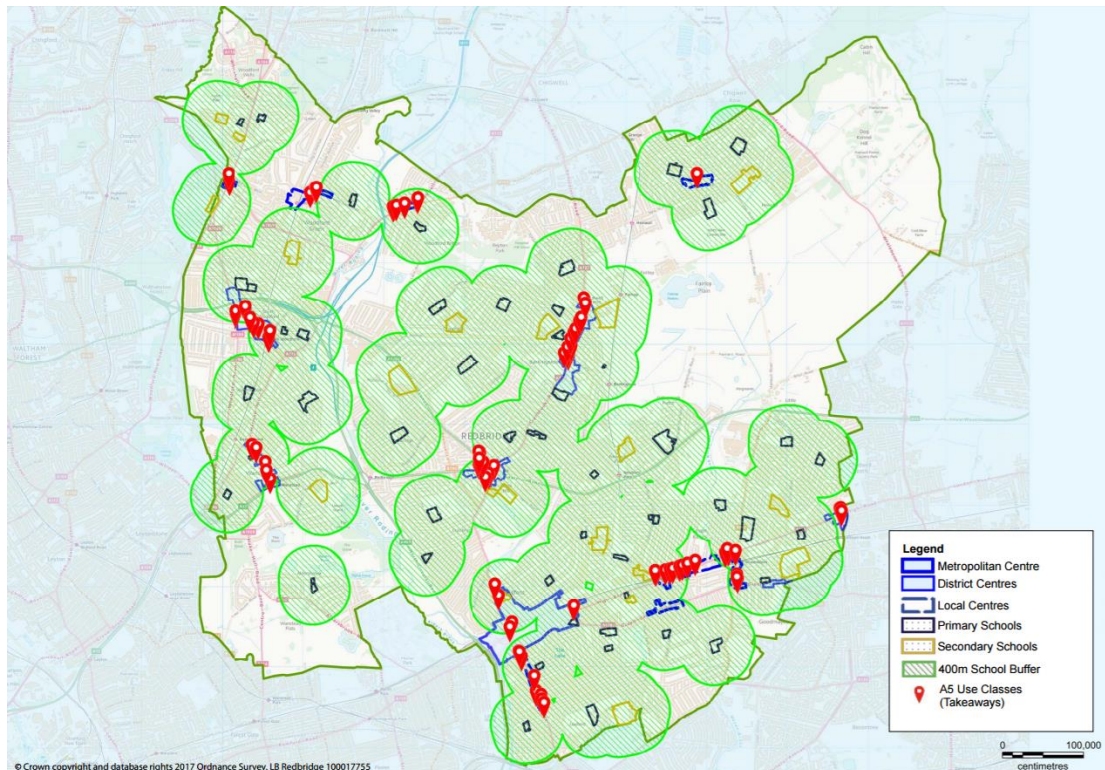
Promote healthy lifestyles

Appraisal of proposed modifications

- 3.7.1 The proposal to remove the Oakfield and Ford Sports Ground Opportunity Sites, has direct implications for ‘Health’ objectives in two respects: 1) Oakfield would deliver new health facilities; and 2) retention of the sites in their current use will prevent a loss of playing pitch capacity in the Borough. See discussion above, within Section 3.2 (‘Poverty’).
- 3.7.2 Other spatial strategy related proposed modifications also have implications for ‘Health’ objectives. It is difficult to suggest that additional urban densification (see para 3.2.3, above) would lead to air quality problems, given that sites will tend to be in high PTAL areas.
- 3.7.3 Also, it is noted that MM9 proposes some additional site specific requirements to guide development of the Billet Road site, clarifying that development must deliver ‘enhanced open space’. This is notable, as Billet Road falls within an area of open space deficiency (see Figure 24 of the Pre-submission Plan).
- 3.7.4 With regards to proposed changes to thematic policy, the most notable proposed change relates to LP11 (Managing Clustering of Town Centre Uses (MM33)). The proposal is to remove the previously proposed 5% threshold aimed at controlling the proliferation of hot food takeaways; however, the criterion that takeaways will be resisted within 400m of a school remains - see **Figure 3.1**.
- 3.7.5 Also of note are proposed changes to -
- LP18 (Health and Well-Being) - MM40 proposes that major developments must submit a Health Impact Assessment (HIA).
 - LP24 (Pollution) - MM50 requires air quality assessments for development of 10 or more new homes.

- LP35 (Protecting and Enhancing Open Spaces) - MM62 and 63 propose clarification of the approach to open space provision in areas of existing deficiency. Proposed new text includes: *“Provision should be in accordance with standards set out in the Council’s Open Spaces Study, unless superseded, and in dense urban areas could include the use of pocket parks, green roofs, and landscaping and public realm provision.”*

Figure 3.1: Hot food takeaways within 400m of schools¹⁰



Appraisal of the submission plan plus proposed modifications

3.7.6 The SA Report concluded -

“Policies recognise the importance of community facilities and infrastructure in enhancing quality of life and social cohesion, and improving personal health and well-being of the borough’s residents. Both green infrastructure and urban infrastructure are identified as crucial in promoting healthy lifestyles, with the Council providing (for example) new and enhanced cycling and walking routes throughout the borough to encourage healthy travel. Furthermore, by discouraging the use of vehicles for transport with these sustainable transport routes, the benefits include reduction of harmful emissions and improvement of overall air quality in the borough. The Plan also directly tackles child obesity levels through restriction of certain hot food takeaway shops clustering in town centres and provision of child play spaces. Overall, if the residents embrace the narrative of the Plan, then this should lead to positive benefits for health and well-being of Redbridge’s residents. However, significant effects are unlikely, given the wide ranging nature of health determinants.”

3.7.7 This conclusion broadly holds true for ‘the submission plan plus proposed modifications’, although there is a need to temper the conclusion on tackling childhood obesity somewhat.

¹⁰ See <https://www.redbridge.gov.uk/media/3993/a5-takeaway-merged.pdf>

3.8 Landscape / townscape

Maintain, enhance and where appropriate conserve the quality of landscapes and townscapes

Appraisal of proposed modifications

- 3.8.1 The proposal to remove the Oakfield and Ford Sports Ground Opportunity Sites does have positive landscape/townscape implications, recognising that both sites currently comprise extensive open space, and both sites are located within the Green Belt. However, both sites were found by the Green Belt Review (2017) to be suitable for removal from the Green Belt, on the basis that they do not contribute to Green Belt purposes. The study was notably unequivocal in respect of Oakfield, stating that the site *“does not meet any of the NPPF Green Belt purposes. The site does not check unrestricted sprawl of large built-up areas as it is surrounded by development to the north, west and south nor does it prevent neighbouring settlements merging into one another as adjacent development is part of Ilford/Barkingside/Grange Hill. The site solely comprises sports/playing fields with associated buildings and extensive car parking. The existing sports centre is very prominent and affects the openness of GB13b. In addition, the site’s connection to the wider Green Belt is prevented by the presence of the railway on embankment to the east which forms a strong, well defined boundary consistent with paragraph 85 of the NPPF. The site is thus totally enclosed by development and is not connected to land which could be interpreted as “Countryside”. It is also noted that supporting text dealing with the Oakfield site (now proposed for removal) stated: “Given the existing context of the area there is the potential for a development with a variety of character tied together by ‘strong landscaping’.”*
- 3.8.2 Other spatial strategy related proposed modifications also have implications for ‘Landscape/townscape’ objectives:
- Instances of higher urban densification (see para 3.2.3, above) could potentially have negative implications for townscape and character; however, it is not clear that there are significant concerns in practice. This is on the basis of the work completed by the Council to determine the appropriate density of sites, taking into account local character and wider context, as reported in the ‘Local Plan Appendix 1 update’ (LBR2.06) and the Tall Buildings Study (2017). Also, development proposals will be subject to meeting criteria in policies LP26 (Promoting High Quality Design) and 27 (Tall Buildings) in any event.
 - Proposed changes to site-specific policy requirements for the Billet Road and King George / Goodmayes Hospitals Opportunity sites are also of note, given the sensitivities that exist (proximity / linkage to the wider Fairlop Plain at the former, and heritage at the latter). Proposed changes help to address the sensitivities that exist.
 - MM3 and MM4 - propose supplementary references to supporting text, to emphasise the importance of character, design and heritage conservation. Notably, new text is proposed to explain that: *“New development should also conserve and enhance the character and setting of conservation areas and heritage assets within Investment and Growth Areas, as part of a balanced approach towards growth and the preservation of the borough’s historic character.”* This proposed additional text, and other examples of additional text, has been arrived at through a Statement of Common Ground (SOCG) with Historic England (CED042). Within the SoCG, Historic England explain that: *“Areas of concern [with the Submission Plan] 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.”*

- MM12 – proposes new text to explain the purpose of the designation of South Woodford as an Investment and Growth Area, explaining that: *“The designation is about positive economic and physical improvement, so that the area only gains economically and environmentally and does not lose any of the features that make it special. This approach involves a balanced approach to development and the preservation of local heritage assets and their settings, and new buildings will be required to respect local character and make a positive contribution to the area.”*
- MM13 - removes reference to one of the proposed South Woodford Opportunity Sites (Station Estate) having the potential to deliver a ‘landmark building’.
- MM18 - deals with Policy LP2 (Delivering Housing Growth), proposing increased support for infill development on previously developed land, subject to criteria.
- MM22 - also deals with Policy LP2 (Delivering Housing Growth), clarifying that the number of homes assigned to each opportunity site is not a cap; however, equally development *“should nevertheless be consistent with the context and the character of the surrounding area and otherwise cause no unacceptable adverse effects.”*

3.8.3 With regards to proposed changes to thematic policy, most notable are MM53 and MM54 which deal with Policy LP27 (Tall Buildings), reinforcing the use of tall building zones. As stated within proposed new supporting text: *“When considering the impact of planning applications for tall or large buildings in specific areas, it is important to have an awareness of context and how a particular proposal fits into its location.”*

Appraisal of the submission plan plus proposed modifications

3.8.4 The SA Report concluded -

“In the main, the spatial strategy is likely to have positive effects in terms of townscape for the five Investment and Growth Areas. These will arise from key infrastructure improvements such as at Seven Kings Park and Goodmayes Park extension, as well as aims outlined for the preservation and enhancement of the Conservation Areas in South Woodford. There will be some loss of Green Belt, but only where in-line with Green Belt Review recommendations. There will also be potential for the housing and infrastructure growth in Investment and Growth Areas to have localised negative effects on townscape; however, any negative effects are likely to be largely mitigated by a number of design policies, such as policy LP33 which provides overarching protection of the borough’s heritage assets. Overall it is considered that the draft Plan provides sufficient protection to townscape and landscape features. There likely to be localised positive and negative effects, and the overall conclusion is no significant effects.”

3.8.5 This conclusion broadly holds true for ‘the submission plan plus proposed modifications’.

3.9 Biodiversity

Maintain and enhance biodiversity, species and habitats

Appraisal of proposed modifications

3.9.1 The proposal to remove the Oakfield and Ford Sports Ground Opportunity Sites potentially has some minor positive implications for the achievement of ‘Biodiversity’ objectives. In particular, removal of Ford Sports Ground is potentially supported, as parts of the site (mainly land associated with Seven Kings Water, which is an important ecological corridor, with potential for enhancement through deculverting and restoration) designated as a Site of Importance for Nature Conservation (SINC).

- 3.9.2 Other spatial strategy related proposed modifications also have minor positive implications for ‘Biodiversity’ objectives. In particular, the proposal is to add a site specific requirement for the King George/Goodmayes Opportunity Site to deliver: *“Enhanced open space provision, including the protection and enhancement of land designated as a Site of Importance for Nature Conservation.”*
- 3.9.3 With regards to proposed changes to thematic policy, there are notable proposed changes to Policy LP39 (Nature Conservation and Biodiversity). Specifically, MM67 to MM69 propose strengthening of policy wording relating to avoidance of impacts to Epping Forest Special Area of Character (SAC). These changes ensure that under the HRA screening assessment, the Council will consider any mitigation and/or compensation measures proposed to address potential impact on the SAC. The MMs go onto say that such measures would be expected to contribute towards the provision of Suitable Alternative Natural Greenspace (SANG) and/or a contribution towards Strategic Management and Monitoring (SAMM) measures. The Habitats Regulation Assessment (HRA) addendum provides further commentary on this modification.

Appraisal of the submission plan plus proposed modifications

- 3.9.4 The SA Report concluded -

“The spatial strategy leads to limited concerns, from a biodiversity perspective, with perhaps the main concern relating to proposals for ‘King George & Goodmayes Hospitals & the Ford Sports Ground’ (where the Seven Kings Water is an important ecological corridor). Development management policy is in place (notably LP39 ‘Nature Conservation and Biodiversity’) to ensure that issues/opportunities feature in decision-making; however, it is recommended that area/site specific policy should be strengthened to ensure that constraints (and opportunities) are a foremost consideration as part of future decision-making. The plan will likely have a positive effect on the baseline - e.g. addressing the trend for loss of residential gardens - however, significant effects are unlikely.
- 3.9.5 This conclusion broadly holds true for ‘the submission plan plus proposed modifications’, with the proposed plan perhaps performing marginally more positively, given the proposal to remove the Ford Sports Ground Opportunity Site, as well as the modifications to policy LP39.

3.10 Traffic

Reduce the effect of traffic on the environment

Appraisal of proposed modifications

- 3.10.1 It is not possible to conclude that the proposal to remove the Oakfield and Ford Sports Ground Opportunity Sites potentially has positive implications for the achievement of ‘Traffic’ objectives, recognising that both sites are relatively well located in transport/traffic terms, and the implication of lower growth through the Redbridge Local Plan could be pressure for development elsewhere in the Housing Market Area (HMA), in locations that are less suitable in transport/traffic terms.
- 3.10.2 Other spatial strategy related proposed modifications also have limited implications for ‘Traffic’ objectives. With regards to proposed changes to thematic policy, there are notable proposed changes to Policy LP23 (Cycle and Car Parking). Specifically, MM48 proposes aligning parking standards with the London Plan. Under this approach it would remain the case that development in close proximity to public transport nodes should be low parking development.

Appraisal of the submission plan plus proposed modifications

- 3.10.3 The SA Report concluded -

“Traffic policies are set to be in place to prevent additional traffic generation in town centres and across the borough through criteria for new development, with there being a commitment to refusing new development that will adversely impact on the borough’s traffic. Additionally, the Plan sets out policy to promote the use of sustainable transport modes, encouraging walking and cycling and thus lowering the dependency/use of vehicles. The proposed upgrades of existing London underground tube stations and the presence of the new Crossrail line will also help alleviate traffic flows in the borough, and the plan sets out to capitalise on these opportunities. The plan should lead to positive effects; however, significant effects are unlikely.”

3.10.4 This conclusion broadly holds true for ‘the submission plan plus proposed modifications’.

3.11 Climate Change

Reduce contributions to climate change and reduce climate change vulnerability

Appraisal of proposed modifications

3.11.1 The proposal to remove the Oakfield and Ford Sports Ground Opportunity Sites potentially performs poorly, in terms of climate change mitigation objectives, given that both sites might have potential to deliver a decentralised energy / district heating scheme. The Council has undertaken a heat mapping exercise that identifies five district heating Opportunity Sites, which includes Fullwell Cross/Barkingside and King George/Goodmayes Hospitals (i.e. a location adjacent to the Ford Sports Ground site).

3.11.2 With regards to climate change adaptation, the proposal to remove the Ford Sports Ground Opportunity Sites potentially has some minor positive implications, as the site is associated with an area of flood risk, along the Seven Kings Water. This could be a constraint; however, equally it would be possible to avoid vulnerable uses in the flood risk zone and/or mitigate risk through design. Initial masterplanning work had served to demonstrate that built development could be directed to the part of the site that falls within Flood Zone 1 (i.e. low flood risk), and on this basis the site had passed the ‘Sequential Test’.

3.11.3 Other spatial strategy-related proposed modifications have limited implications for climate change mitigation objectives, although it is noted that MM44 and 45 do propose strengthening of Policy LP21 (Water and Flooding) - strengthening of criteria relating to flood risk. It is **recommended** that the following proposed new criterion could potentially be strengthened further, recognising that water development for compatible uses could potentially conflict to maximise the ability of a floodplain to store water in times of flood: *“(a) Safeguarding the functional flood plain (Flood Zone 3b) as land where water can flow to or be stored in times of a flood from development other than water compatible uses or essential infrastructure.”*

Appraisal of the submission plan plus proposed modifications

3.11.4 The SA Report concluded -

“The plan should help to ensure that climate change mitigation and adaptation is a consideration at the design stage, e.g. supporting delivery of decentralised energy networks and green infrastructure. The plan should help to ensure reduced ‘per capita’ CO2 emissions from the built environment; however, the key policies that will tackle climate change in Redbridge are those based upon sustainable transport. These policies are aimed at discouraging vehicular use and promoting the use of new and existing cycle, walking, train and bus routes. There will be positive effects; however no significant effects are predicted, recognising that climate change is a global issue.”

3.11.5 This conclusion broadly holds true for ‘the submission plan plus proposed modifications’.

3.12 Waste

Minimise the production of waste and encourage recycling

Appraisal of proposed modifications

- 3.12.1 The proposal to remove the Oakfield and Ford Sports Ground Opportunity Sites does not have implications for the achievement of waste management objectives, nor do other proposed changes have any notable implications. MM50 proposes a minor change to Policy LP24 (Pollution) relating to waste management.

Appraisal of the submission plan plus proposed modifications

- 3.12.2 The SA Report concluded -

“Overall the Plan makes sufficient acknowledgement of the Council’s role in the East London Waste Authority which has set out a planning strategy to 2021 for sustainable waste management in the borough. The strategy aims to safeguard existing waste management facilities and to provide a framework for managing waste arisings in Redbridge. However, the plan might potentially go further to support good waste management through design measures, and a number of recommendations are made to this effect. Overall, no significant effects are predicted.”

- 3.12.3 This conclusion holds true for ‘the submission plan plus proposed modifications’.

3.13 Economy

Encourage sustained economic growth

Appraisal of proposed modifications

- 3.13.1 The proposal to remove the Oakfield and Ford Sports Ground Opportunity Sites, and thereby follow a lower housing growth strategy (exceeding the London Plan housing target by 2%; see discussion within Section 3.4, above) potentially has minor negative implications for ‘Economy’ objectives. This conclusion is reached recognising that -

- The following quote from the Redbridge Local Economic Assessment (LEA, 2016) serves to indicate that higher housing growth would be welcomed, from an economic perspective: *“There is no such thing as a self-contained “Redbridge economy”. Along with the other outer northeast London boroughs, Redbridge does not have a self-contained labour market or discrete local economy. It is heavily integrated into the wider London economy and in particular helps provide a skilled labour force to inner and central London boroughs...”*
- The LEA advocates: *“Harnessing growth and achieving sustainable patterns of development by focussing new development in the Investment and Growth Areas.”*
- The LEA recognises that delivering ‘sustainable communities’ – with good access to transport and community infrastructure – is important from an economic perspective. Priorities identified include: providing children with the best possible education to maximise participation in the knowledge economy; and providing employees with efficient transport to workplaces. The LEA states: *“Locating new buildings near public transport hubs is essential in encouraging use of sustainable means of travel, reducing emissions from private vehicles and reducing congestion. The Crossrail Corridor is an Opportunity Site for new development and the proximity to the fast-rail link should encourage greater use of public transport [emphasis added].”*

- 3.13.2 Other spatial strategy related proposed modifications also have implications for ‘Economy’ objectives. The proposal is to reduce the amount of new employment floorspace supported across several Investment and Growth Areas, most notably within the Crossrail Corridor Investment and Growth Area; however, it is difficult to conclude on strategic implications for ‘Economy’ objectives. This is on the basis that changes are reflective of detailed work to examine the appropriate density and mix of uses at each Opportunity Site, as explained within the Council’s ‘Appendix 1 Development Opportunity Sites Review’ (LBR2.06); and also recognising the proposal to bolster Policy LP14 (Stimulating Business and the Local Economy; see discussion below). The broad approach is to support more fit-for-purpose employment spaces that align with modern working practices, as part of mixed use developments.
- 3.13.3 With regards to proposed changes to thematic policy, the main point to note is the proposal to amend Policy LP14. The proposal is to support economic development by protecting the Borough’s better quality employment land, and securing the provision of a minimum 21,206m² of new fit for purpose employment spaces that align with modern working practices as part of mixed use developments.

Appraisal of the submission plan plus proposed modifications

- 3.13.4 The SA Report concluded -
- “Support for sustained economic growth is a major focus of the policies within the ‘Promoting and managing growth’ section of the plan.. The overall strategy of the draft Plan is to propose five significant Investment and Growth Areas (LP1A–E); combined, these five areas have the potential to provide an additional 42,000sqm of retail space, 60,000sqm of employment floorspace and 4,800 new jobs to the borough. This is likely to have significant positive effects in terms of encouraging sustained economic growth – for instance through creating employment opportunities for residents, and also by attracting further businesses to Redbridge through the strategic positioning of these growth areas in proximity to transport hubs.”*
- 3.13.5 The proposal is now to deliver 63,500sqm of retail space, 35,000sqm of employment and 5,925 jobs to the borough. Although a drop in actual employment floorspace, there is a gain in the number of jobs owing to the proposed approach of providing more new fit-for-purpose employment spaces that align with modern working practices, as part of mixed use developments. Policies LP1A-E (as modified) provide targets for new employment and retail floorspace by Investment and Growth area, whilst Revised Appendix 1 – Development Opportunity Sites (LBR2.06.1) further sets out where such provision is anticipated on individual sites. Proposed modification to Policy LP1 will ensure the figures provided in Appendix 1 of the plan will be a key consideration when development proposals on individual sites come forward. Therefore, ensuring an appropriate mix of uses is secured, helping to achieve the Council’s objective of harnessing economic and town centre growth.

3.14 Incomes

Improve incomes and living standards

Appraisal of proposed modifications

- 3.14.1 The proposal to remove the Oakfield and Ford Sports Ground Opportunity Sites has limited implications for ‘Income’ objectives, over-and-above implications discussed above, under the ‘Economy’ heading. Ford Sports Ground falls within the Crossrail Corridor, which is an identified regeneration area; however, it is difficult to conclude that the proposal to retain Ford Sports Ground in its current use (sports pitches) will have notable implications for regeneration objectives, and in turn the objective to improve incomes and living standards.
- 3.14.2 Other relevant proposed modifications are discussed above, under ‘Economy’.
- Appraisal of the submission plan plus proposed modifications
- 3.14.3 The SA Report concluded -

“Policies related to job creation may also have positive implications for income levels; however, there is little certainty in this respect. There is also focus on skills and training - through a dedicated policy - which may have more marked effects. Overall, the plan should have a positive effect on income levels; however, significant effects are unlikely.”

3.14.4 This conclusion broadly holds true for ‘the submission plan plus proposed modifications’.

3.15 Business

Enhance the image of the area as a business location

Appraisal of proposed modifications

3.15.1 The proposal to remove the Oakfield and Ford Sports Ground Opportunity Sites potentially has some minor negative implications for ‘Business’ objectives, generally relating to the matters/issues discussed above, under the ‘Economy’ heading. It is also fair to say that removal of the sites may have negative implications for the Borough’s housing mix, which is potentially an issue for the image of the area as a business location.

3.15.2 Other relevant proposed modifications are discussed above, under ‘Economy’.

Appraisal of the submission plan plus proposed modifications

3.15.3 The SA Report concluded -

“Policies (LP1A–E) outline the Council’s aim for commercial and retail floor space provision within each of the outlined Investment and Growth Areas in the borough. The provision of additional commercial and retail space has the potential to attract a range of businesses; however, there may also be a risk of negative implications for existing businesses. Effects are likely to be positive overall; however, significant effects are unlikely.”

3.15.4 This conclusion broadly holds true for ‘the submission plan plus proposed modifications’.

3.16 Transport

Provide a high quality, reliable transport network to support the development of the borough

Appraisal of proposed modifications

3.16.1 The proposal to remove the Oakfield and Ford Sports Ground Opportunity Sites has negative implications for the achievement of ‘Transport’ objectives. Focusing on the matter of development supporting upgrades to the local transport network (with walking/cycling/access issues already having been discussed above, under ‘Traffic’), it is clear that there is a need to focus housing growth within the Investment and Growth Areas, with a view to achieving a critical mass that in turn enables transport infrastructure upgrades. Ford Sports Ground site is associated with an opportunity to improve walking/cycling links; however, improved links can still be delivered through the adjacent King George and Goodmayes Hospitals site. With regards to Oakfield, whilst the location of this site would enable new residents to walk/cycle and access public transport, it is worth noting that the ‘Transport Evidence’ study (2017) does highlight that development of this site, along with other sites in the Hainault and Fairlop area, could stretch the capacity of bus services.

3.16.2 Other relevant proposed modifications are discussed above, under ‘Traffic’.

Appraisal of the submission plan plus proposed modifications

3.16.3 The SA Report concluded -

“The five Investment and Growth Areas outlined by policy LP1 are situated in close proximity to existing transport links, with the Ilford and Crossrail Corridor policies planned in accordance with the Crossrail route. This strategy, although not contributing directly to the transport links, will ensure significantly positive effects for transport in terms of ensuring future accessibility to public transport for residents and businesses. Furthermore, there are a number of policies which directly address developing a high quality reliable transport network within the borough. The plan should lead to positive effects; however, it is difficult to draw conclusions regarding significance. There are many factors, for example effects are reliant on delivery of major infrastructure, most notably Crossrail (and as such will be more long term).”

3.16.4 This conclusion broadly holds true for ‘the submission plan plus proposed modifications’.

4 CONCLUSIONS

4.1.1 The proposal to remove the Oakfield and Ford Sports Ground Opportunity Sites, and thereby follow a lower housing growth strategy (exceeding the London Plan housing target by 2%), is supported in terms of ‘Health’ objectives in particular, as the result will be confidence regarding the capacity of sports pitch provision in the Borough. The proposal has positive implications for a range of specific groups, including the South Asian community (South Asian League cricket is growing and currently accounts for at least 35% of the cricket playing population); and, more broadly, is supportive of work to promote social cohesion and inclusion, such as the significant Inter Faith work being undertaken by Essex Cricket in Redbridge. As such, the proposal has positive implications from an Equalities perspective.

4.1.2 However, the proposal has drawbacks in terms of other objectives, with higher housing growth supported in terms of ‘Housing’ and (to a lesser extent) ‘Economy’ objectives. Both sites are suitable for development in some respects. Notably, Oakfield benefits from proximity to Barkingside District Centre, Fairlop underground station, leisure facilities, and open space at Fairlop Country Park. It is also the case that both sites would have delivered new community infrastructure, to include two new secondary schools and a health facility; however, there is little reason to suggest that removing these sites from the strategy will lead to a shortfall in infrastructure capacity. This is particularly the case given the proposal to strengthen site specific and development management policy relating to infrastructure delivery.

4.1.3 Another important matter is the proposal to adjust the housing density/yield at various Opportunity Sites, and in turn adjust the amount of employment and retail supported, following the Council’s “Review of Appendix 1: Development Opportunity Sites” (LBR 2.06). Most notable are the proposals to: A) decrease housing units / increase retail floorspace within Ilford Town Centre; and B) increase housing units / decrease employment floorspace within the Crossrail Corridor. The changes in housing numbers / floorspace respond to the re-assessment of all individual site capacities and fuller consideration of non-residential uses. As such, it is difficult to conclude on strategic implications for sustainability objectives. The decrease in employment floorspace is notable; however, any concerns are somewhat allayed by the proposal to bolster Policy LP14 (Stimulating Business and the Local Economy). The effect of proposed modifications to LP1 (Spatial Development Strategy) will be to support 1,125 additional jobs overall (albeit reduced jobs are supported in the Crossrail Corridor and Barkingside Investment and Growth Areas), despite the reduced area of employment floorspace.¹¹

4.1.4 With regards to ‘submission plan plus proposed modifications’, the overall conclusions presented within the 2016 SA Report were as follows:

¹¹ 1,600 additional jobs are supported across the Ilford, Gants Hill and South Woodford Investment and Growth Areas, whilst 475 fewer jobs are supported across Crossrail Corridor and Barkingside. As such, there is net support for an additional 1,125 jobs.

“The Council’s preferred spatial approach to growth and change aims to respond to the key planning challenges since the adoption of the Core Strategy and Borough Wide Primary Policies (2008), representations received through consultations, and a suite of technical evidence base. There is a need to develop a positive strategy to enable the delivery of successful places and a thriving economy, taking into account other Council plans and strategies that influence the borough; and ultimately provide a robust planning framework against which the aspirations of the Council can be successfully delivered.

The preferred spatial approach is to direct growth to the borough’s Investment and Growth Areas and town centres. These areas are highly accessible locations, well connected to the borough’s public transport network. They offer a range of investment opportunities with substantial capacity to accommodate new homes, jobs and infrastructure. It is considered that the preferred approach is the most sustainable and will achieve the London Plan housing target of 1,123 homes and help close the gap between it and the objectively assessed housing need. The Council’s decision to proceed with Oakfield as an opportunity site and the other sites of Goodmayes and King George Hospital and the Ford Sports Ground and land at Billet Road will significantly contribute towards the Council meeting its housing need.

The SA process has informed the Local Plan and in general supports the preferred strategy. Whilst the alternatives appraisal process has highlighted that there are draw-backs to the preferred approach, it has enabled the Council to reach a conclusion that it is, on-balance, the most sustainable option. In particular, the Council is of a view that:

- A lower growth option involving nil growth at Oakfield would compromise the achievement of important housing delivery objectives without leading to a plan that performs notably better in terms of other strategic objectives (recognising the merits of this site, and the potential to address issues at the site through policy and committed plan implementation).*
- A higher growth approach would help to meet objectively assessed housing needs more fully, but would compromise achievement of other important objectives (e.g. higher density development would lead to challenges from a community infrastructure delivery perspective).”*

- 4.1.5 This conclusion broadly holds true for ‘the submission plan plus proposed modifications’. The strategy can still be described as ‘positive’, e.g. recognising the proposed approach of increasing housing delivery in the urban areas; however, it is the case that the Oakfield and Ford Sports Ground Opportunity Sites are no longer proposed for release from the Green Belt, and, in turn, there is less of a focus of growth within the Crossrail Corridor and Barkingside Investment and Growth Areas. The concern presented within the first bullet point regarding the achievement of housing delivery objectives under a scenario not involving allocation of Oakfield is now allayed, given the Inspector’s conclusion that it is appropriate to provide for a total quantum of homes 2% above the London Plan target, and also given proposed strengthening of site-specific and development management policy wording, in particular in respect of delivering affordable housing, family housing and social infrastructure.

4.2 Monitoring

- 4.2.1 The SA Report proposes monitoring indicators in-light of appraisal findings. Given the appraisal findings presented in this SA Report Addendum, it is suggested that particular emphasis be given to monitoring of the Plan’s impacts with respect to secondary school capacity and also health facility capacity.

5 NEXT STEPS

- 5.1.1 The next step is for the Inspector to consider the representations raised as part of the consultation, alongside this SA Report Addendum, before deciding whether he is in a position to write his report on the Plan’s soundness.
- 5.1.2 Assuming that the Inspector is able to find the Plan ‘sound’, it will then be formally adopted by the Council. At the time of adoption an ‘SA Statement’ will be published that explains the process of plan-making / SA in full and presents ‘measures decided concerning monitoring’.