

Sustainability Appraisal (SA) of the Redbridge Local Plan

SA Report

July 2016

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AECOM Infrastructure and Environment UK Limited
 6-8 Greencoat Place
 London, SW1P 1PL
 Telephone: +44(0)20 7798 5000
 Fax: +44(0)20 7798 5001

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INTRODUCTION

1 BACKGROUND

- 1.1.1 AECOM is commissioned to lead on Sustainability Appraisal (SA) in support of the emerging Redbridge Local Plan. SA is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives, with a view to avoiding and mitigating adverse effects and maximising the positives. SA of Local Plans is a legal requirement.¹

2 SA EXPLAINED

- 2.1.1 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which transposed into national law EU Directive 2001/42/EC on Strategic Environmental Assessment (SEA).²
- 2.1.2 In-line with the Regulations, a report (known as **the SA Report**) must be published for consultation alongside the draft plan that essentially 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'.³ The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 2.1.3 More specifically, the SA Report must answer the following **three questions**:
1. What has Plan-making / SA involved **up to this point**?
 - Including with regards to consideration of 'reasonable alternatives'.
 2. What are the SA findings **at this stage**?
 - i.e. in relation to the draft plan.
 3. What happens **next**?
 - What steps will be taken to finalise the plan?
 - What measures are proposed to monitor plan implementation?

2.1 This SA Report⁴

- 2.1.1 This document is the SA Report for the Redbridge Local Plan, and as such each of the three SA questions is answered in turn below, with a 'part' of the report dedicated to each.
- 2.1.2 Before answering Question 1, two initial questions are answered in order to further 'set the scene': i) What is the plan trying to achieve?; and ii) What's the scope of the SA?

¹ Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (2012). The Town and Country Planning (Local Planning) (England) Regulations 2012 require that an SA Report is published for consultation alongside the 'Proposed Submission' plan document.

² The SA process, for the Local Plan, incorporates the SEA process. Equally, this SA Report includes the information required of the SEA ('Environmental') Report (see Schedule 2 of the SEA Regulations). SA is SEA without a particular focus on the environment (i.e. with an equal focus on all three pillars - environmental, social and economic - of sustainable development).

³ Regulation 12(2)

⁴ See Appendix I for further explanation of the regulatory basis for answering certain questions within the SA Report, and a 'checklist' explaining more precisely where within this report certain regulatory reporting requirements are met.

3 WHAT IS THE PLAN SEEKING TO ACHIEVE?

- 3.1.1 The Council's existing Local Plan (Core Strategy and Borough Wide Primary Policies) was adopted in 2008 and successfully managed the significant change the borough has experienced since then. It now needs a review to respond to new opportunities and pressures such as a rising population, housing growth, boosting the economy, maximising benefits of Crossrail and other social and community infrastructure to residents and businesses.
- 3.1.2 The Redbridge Local Plan 2015-2030 will set out the Council's vision and plan for how the borough will grow and develop over the next 15 years. It will be a positive strategy for delivering sustainable development and delivering the Council's priorities of growth, securing new housing, boosting the economy and creating new jobs. The plan will support regeneration schemes, accelerated housing delivery as part of Ilford's Housing Zone, major investment in community infrastructure, and the enhanced accessibility related to Crossrail.
- 3.1.3 While facilitating major change, this Local Plan will also safeguard and enhance what is good and special about Redbridge – its extensive open spaces, quality parks and gardens, excellent schools, heritage, distinctive buildings, neighbourhood character and thriving small businesses.
- 3.1.4 Importantly, the Redbridge Local Plan will be in general conformity with the London Plan (2015), which sets out the Mayor's development priorities and the strategic planning framework for London, including through setting borough level housing targets and identifying locations for future growth of London-wide importance. Also, the Redbridge Local Plan must have regard for the plans (adopted and emerging) of neighbouring local authorities (both within London and Essex), in-line with the Duty to Cooperate.

Plan objectives

- 3.1.5 In-line with the aims and priorities of the Corporate Strategy (2014 – 2018) and the Redbridge Fairness Commission (2015); and in-light of a review of key planning issues locally, the Local Plan objectives are as follows -
- Objective 1: Promoting and Managing Growth
 - Harness growth and help achieve sustainable patterns of development by focusing new development in the borough's Investment and Growth Areas of Ilford, Barkingside, Crossrail Corridor, Gants Hill and South Woodford;
 - Deliver up to 18,500 new homes across the borough through the creation of high quality developments in a phased programme to help meet existing and future housing needs;
 - Ensure diversity in the type, size and tenure of housing, including affordable housing to meet local needs, to deliver the annual housing target of 1,123 new homes;
 - Improve health and wellbeing of Redbridge's population and reduce health inequalities through good spatial planning, supporting healthier lifestyles and environmental improvements, as well as ensuring appropriate access to health facilities;
 - Increase the capacity, quality and density of the borough's Strategic Industrial Location (SIL) at Hainault Business Park and Southend Road Business Area to enable new and emerging businesses in sectors that are projected to expand in the future;
 - Improve existing employment land/estates and ensure they are attractive to regional, national and international investors in order to maximise employment opportunities;
 - Encourage and maintain an appropriate mix of town centre uses in Ilford Metropolitan Town Centre, the District Centres of Barkingside, Chadwell Heath (part) Gants Hill, South Woodford and Wanstead, and the borough's local Neighbourhood Parades; and
 - Ensure that employment opportunities are accessible to all and assist in securing the provision of employment training opportunities for all residents.

- Objective 2: Promoting a Green Environment
 - Capitalise on enhanced connectivity between Ilford and Central London with the arrival of Crossrail in 2019;
 - Encourage sustainable patterns of transport by improving walking and cycling routes;
 - Encourage cleaner air;
 - Deliver significant public realm improvements to Ilford Station;
 - Promote low carbon living and working;
 - Support the delivery of decentralised energy networks in Investment and Growth Areas to enable sustainable mixed use developments;
 - Manage flood risk.
- Objective 3: Promoting High Quality Design
 - Promote high quality, safe and sustainably designed buildings, places and streets;
 - Promote and protect the high levels of amenity and quality of life to make Redbridge an attractive, successful and vibrant place for residents, workers and visitors
- Objective 4: Protecting and Enhancing Redbridge's Assets
 - Improve existing open spaces and manage open space deficiency;
 - Provide the conditions for playing pitches and sports provision;
 - Protect conditions for biodiversity;
 - Preserve and enhance the unique character of Redbridge and the distinctiveness of the borough's conservation areas and other historic and valued buildings, spaces and places.

3.2 What is the Local Plan not seeking to achieve?

- 3.2.1 It is important to emphasise that the plan will be strategic in nature. Even the allocation of sites and the establishment of development management policy should be considered a strategic undertaking, i.e. a process that omits consideration of some detailed issues (in the knowledge that they can be addressed at the planning application stage).
- 3.2.2 The strategic nature of the Local Plan is reflected in the scope of the SA.

4 WHAT'S THE SCOPE OF THE SA?

4.1 Introduction

- 4.1.1 The aim here is to introduce the reader to the scope of the SA, i.e. the sustainability issues / objectives that should be a focus of (and provide a broad methodological framework for) SA.
- 4.1.2 Further information on the scope of the SA – i.e. a more detailed review of sustainability issues/objectives as highlighted through a review of the sustainability ‘context’ and ‘baseline’ - is presented in **Appendix II**.

Consultation on the scope

- 4.1.3 The Regulations require that *“When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e. the SA scope], the responsible authority shall consult the consultation bodies”*. In England, the consultation bodies are Natural England, the Environment Agency and Historic England.⁵
- 4.1.4 As such, these authorities were consulted on the SA scope in 2013.⁶ Since that time, the SA scope has evolved as new evidence has emerged - however, the scope remains fundamentally similar to that agreed through the dedicated scoping consultation in 2013.
- N.B. Stakeholders are also welcome to comment on the SA scope at the current time. Any comments received will be taken into account in due course (see Part 3 ‘Next Steps’).

4.2 Key issues / objectives

- 4.2.1 The following table presents the sustainability objectives, and supporting criteria, established through SA scoping, i.e. in-light of context/baseline review and consultation. Taken together, these sustainability objectives and criteria provide a methodological ‘framework’ for appraisal.

⁵ In-line with Article 6(3) of the SEA Directive, these consultation bodies were selected because ‘by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes.’

⁶ The Scoping Report is available at: http://www2.redbridge.gov.uk/cms/planning_and_the_environment/planning_policy_regeneration/local_development_framework/redbridge_local_plan/preferred_options_report.aspx.

Table 4.1: Sustainability objectives and criteria (i.e. the SA framework)

Objective	Decision-aiding criteria <i>Will the policy option...</i>
1. Reduce poverty and social exclusion	<ul style="list-style-type: none"> • Promote employment in the most deprived areas and stimulate regeneration? • Reduce unemployment? • Promote social cohesion and encourage engagement in community activities? • Connect disadvantaged people with education skills and training? • Promote community spirit? • Promote a culture of equality and fairness for all people? • Promote equality for Black and ethnic minority groups, for women, disabled people, the elderly and people of different faiths?
2. Reduce and prevent crime and the fear of crime	<ul style="list-style-type: none"> • Reduce actual levels of crime? • Reduce anti-social behaviour? • Reduce the risk of terrorist attack? • Make people feel safe on the streets at night? • Make people feel that public transport is safe to use?
3. Meet local housing needs by ensuring that everyone has the opportunity to live in a decent, affordable home	<ul style="list-style-type: none"> • Reduce homelessness? • Reduce the number of unfit homes and overcrowding? • Increase the range of housing choice, taking account of people’s preferences for size, location, type and tenure? • Improve the quality of housing? • Make homes more affordable? • Provide housing that encourages a sense of community and a sense of place?
4. Improve the education and skill of the population overall	<ul style="list-style-type: none"> • Increase levels of participation and attainment in education? • Improve overall achievement for primary and secondary school children? • Increase the number of people with tertiary/higher education attainment? • Improve on-the-job education and training? • Promote lifelong learning activities? • Contribute to meeting skills shortages?
5. Provide accessible community services and leisure opportunities	<ul style="list-style-type: none"> • Help people send their children to a school of their choice? • Help people locate and access post offices, other services and health facilities? • Allow people do their day to day shopping without the need for long trips? • Increase provision of theatres, library services, cinemas etc? • Assist access for the elderly, the disabled and those without a car?
6. Promote healthy lifestyles	<ul style="list-style-type: none"> • Encourage people to eat a more balanced diet and help tackle obesity? • Provide new sporting/recreational facilities or result in more people exercising? • Improve understanding of physical and mental health issues? • Reduce the levels of pollution people are exposed to? • Help find a doctor and gain medical attention quickly? • Lead to fewer people smoking, lower levels of binge drinking, or combat other types of substance abuse?
7. Maintain, enhance and where appropriate conserve the quality of landscapes and townscapes	<ul style="list-style-type: none"> • Help make people feel positive about the area they live in? • Preserve open space by building on previously developed land? • Respect and improve visual amenity? • Promote high quality design? • Protect listed buildings? • Encourage good use of landscaping?

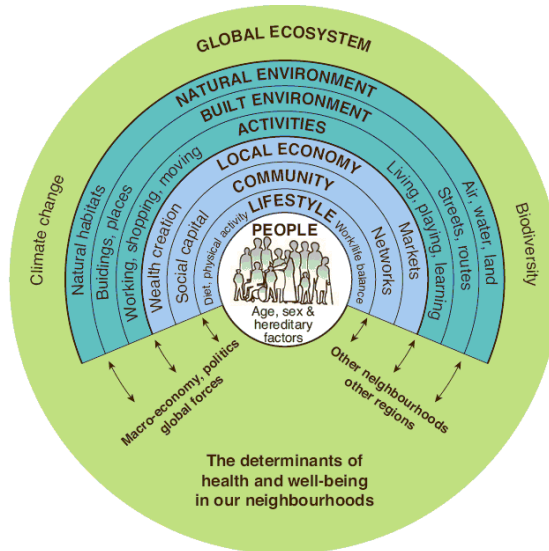
Objective	Decision-aiding criteria <i>Will the policy option...</i>
8. Maintain and enhance biodiversity , species and habitats	<ul style="list-style-type: none"> • Improve the quality or extent of nature conservation sites? • Adversely impact on sites protected by the EU Habitats Directive? • Enhance the ecological function of the greenspace network? • Protect the water quality of the borough’s rivers, lakes and other water bodies? • Protect trees and other natural vegetation? • Create new habitat through landscaping, re-vegetation or ‘green’ construction? • Educate and bring people closer to the natural environment? • Protect Biodiversity Action Plan species?
9. Reduce the effect of traffic on the environment	<ul style="list-style-type: none"> • Reduce the overall need for people to travel? • Reduce traffic volumes and traffic congestion? • Reduce pollution? • Help people get around by walking or cycling? • Improve public transport provision? • Provide better connections between different types of transport? • Reduce the number of road traffic accidents?
10. Reduce contributions to climate change and reduce climate change vulnerability	<ul style="list-style-type: none"> • Minimise emissions of greenhouse gases? • Minimise the risk of flooding from rivers and watercourses? • Mitigate the effects of climate change? • Encourage use of renewable and low carbon energy? • Improve energy efficiency and insulation of homes?
11. Minimise the production of waste and encourage recycling	<ul style="list-style-type: none"> • Reduce the amount of waste being produced? • Promote reuse and recycling? • Help promote a market for recycled products? • Make waste easier to collect and transport? • Allow waste to be used for heating or power generation?
12. Encourage sustained economic growth	<ul style="list-style-type: none"> • Lead to new businesses being created and diversify the economy? • Give Redbridge a competitive advantage in the region? • Promote investment in leading edge technologies? • Expand the employment base in the borough? • Encourage innovation and flexibility in work and management practices? • Minimise the burden of regulatory costs?
13. Improve incomes and living standards	<ul style="list-style-type: none"> • Put more people in jobs? • Help people pay of mortgages and save for the future? • Allow more people to earn money independently?
14. Enhance the image of the area as a business location	<ul style="list-style-type: none"> • Create commercial areas with a sense of identity and vibrancy? • Reduce the number of vacant and derelict buildings? • Make commercial areas more attractive and accessible? • Help Redbridge town centres maintain / strengthen their position in E. London? • Help Redbridge promote and sell itself more widely? • Capitalise on Crossrail-related opportunities?
15. Provide a high quality, reliable transport network to support the development of the borough	<ul style="list-style-type: none"> • Help people commute to places of employment more easily? • Improve access to retail and commercial services? • Reduce delays and make public transport more reliable? • Let people move easily/safely between transport nodes and commercial areas? • Help traffic move more freely? • Help people find town centre parking when they need it? • Improve linkages with the region, including capitalising on Crossrail? • Assist delivery and service vehicle access?

4.3 A note on ‘health’ and ‘equalities’ considerations

Health

- 4.3.1 The NPPF requires that Local Plans promote healthy communities and reflect an evidence-based assessment of health and wellbeing needs. In line with the Marmot Review into health inequalities in England (2010), planning for health in the context of Local Plans primarily involves planning for *determinants of health*, including those related to the quality of the natural and built environment, daily activities and lifestyles, communities and the economy.
- 4.3.2 In the case of the Redbridge Local Plan, health considerations were a focus of SA scoping work (leading to the development of a health focused SA objective – see objective 6 in Table 4.1); and so the SA process can be said to ‘integrate’ Health Impact Assessment (HIA). Health issues/impacts are discussed as part of appraisal text within this report.

Figure 4.1: Determinants of health and wellbeing, from Barton & Grant (2006)



Equalities

- 4.3.3 The Council has a duty to give "due regard" to promoting equality of opportunity for all groups with protected characteristics when making policy decisions; and publish information showing how they are complying with this duty. ‘Protected characteristics’ are: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation.
- 4.3.4 In the case of the Redbridge Local Plan, equalities considerations are not an explicit focus of the SA framework (Table 4.1); however, there is ample opportunity to consider equalities under the Objectives 1 (Poverty) and 3 (Housing), as well as under other objectives. As such, the SA process can now be said to ‘integrate’ Equalities Impact Assessment (EqIA). Equalities issues/impacts are discussed as part of appraisal text within this report, including as part of the appraisal of the Draft Plan presented in ‘Part 2’.

PART 1: WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT?

5 INTRODUCTION (TO PART 1)

- 5.1.1 Plan-making has been underway since 2011, with three formal consultations⁷ having been held (under Regulation 18 of the Local Planning Regulations) prior to this current stage (Regulation 19), and two Interim SA Reports⁸ having previously been published.
- 5.1.2 Rather than recap the entire 'story' in detail, the focus here is on explaining the work undertaken in 2016, which led to the development of the draft plan that is currently the focus of appraisal (see Part 2, below) and is currently published under Regulation 19.
- 5.1.3 Specifically, in-line with regulatory requirements, there is a need to explain how work was undertaken to develop and then appraise **reasonable alternatives**, and how the Council then took into account appraisal findings when finalising the Proposed Submission Plan.
- 5.1.4 As such, this part of the report is structured as follows:

Chapter 6 - explains reasons for selecting the alternatives dealt with...

... in 2016, in light of past plan-making / SA work

Chapter 7 - presents an appraisal of the reasonable alternatives

Chapter 8 - explains reasons for selecting the preferred option.

- 5.1.5 Presenting this information is important given regulatory requirements.⁹ Specifically, the SA Report published alongside the draft plan is required to present an appraisal of "reasonable alternatives" and "an outline of the reasons for selecting the alternatives dealt with".

What has been the focus of alternatives appraisal?

- 5.1.6 There has been a focus on the consideration of reasonable **spatial strategy alternatives**, i.e. alternative approaches to the allocation of land to meet housing (and economic) needs.
- 5.1.7 Whilst the plan objectives (see chapter 3, above) are numerous and cover a range of issues, it is apparent that a key issue/objective relates to the allocation of land to meet housing needs. Hence it was identified as reasonable that alternatives appraisal should focus on this matter.¹⁰

⁷ An initial consultation was held in 2011 to identify the key issues for the new plan. Subsequently, a consultation on 'Preferred Options' was held in 2013. Most recently, a 'Preferred Options Extension' consultation was held in 2014.

⁸ In 2013, the SA document published as part of the Preferred Options consultation sought to do two things, namely 1) present the SA scope for consultation; and 2) present an appraisal of the emerging draft plan. In 2014, the Preferred Options Extension consultation document itself presented appraisal findings (specifically, see Appendix B 'Sustainability Appraisal').

⁹ Environmental Assessment of Plans and Programmes Regulations (2004)

¹⁰ In line with the Environmental Assessment of Plans and Programmes Regulations (2004), a decision on what 'reasonably' should be the focus of alternatives appraisal should be made in-light of the plan objectives.

6 DEVELOPING THE REASONABLE ALTERNATIVES

6.1 Introduction

6.1.1 This chapter explains the work undertaken in 2016 to develop ‘reasonable’ spatial strategy alternatives. This chapter:

- 1) Explains the **context and background** to alternatives development
- 2) Presents / explains the **reasonable alternatives**.

6.2 Context and background

6.2.1 Context/background to the development of reasonable alternative spatial strategies for Redbridge is understood from:

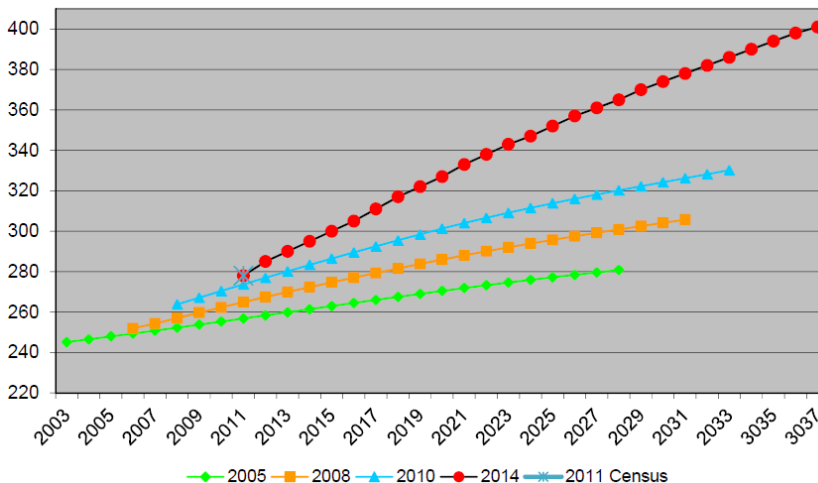
- 1) Evolving evidence of housing needs and the supply of available land (2013 - 16)
- 2) The 2014 Preferred Options Extension consultation
- 2) The 2016 Green Belt Review.

Evolving evidence of housing needs and the supply of available land (2013-16)

6.2.2 Early plan-making - i.e. plan-making in the build-up to the **2013** Preferred Options Report (POR) consultation - worked from the understanding that the borough must make provision for 760 dwellings per annum (dpa), or 11,400 homes over the period 2013-2028, in order to comply with the London Plan of 2011. The Council recognised that making provision for this number of homes would not meet full housing needs - the Redbridge Housing Needs and Requirements Study (ORS, 2010) having established a housing need of at least 2,000 dpa - but providing for 11,400 was understood to reflect a pragmatic assessment of land availability/suitability, drawing on the London-wide Strategic Housing Land Availability Assessment (SHLAA, 2009) and Green Belt Review (LBR/Colin Buchanan, 2010).

6.2.3 By the time of the **2014** Preferred Options Report Extension (PORE) consultation, it was recognised that Further Alterations to the London Plan were forthcoming, and were likely to significantly increase the borough’s housing target. Also, the consultation document presented analysis from the 2011 census, explaining that population growth in Redbridge had in practice greatly outstripped predictions - see **Figure 6.1**. However, the consultation document nonetheless worked from the basis that providing for the 2011 London Plan target (760 dpa) would represent sustainable development.

Figure 6.1: Redbridge Population (1000s) - Actual (2011) and Projected



- 6.2.4 Subsequently, the London Plan (2015)¹¹ set a housing target for Redbridge of 1,123 dpa, or 16,845 homes over the plan period. This target is based on the London-wide SHLAA of 2013, which took into consideration the potential housing capacity of two Green Belt sites - Oakfield in Barkingside, and land in and around the King George and Goodmayes Hospitals - on the basis that these had been identified as potentially developable by the Redbridge Green Belt Review of 2010, and were supported by the Council within the POR consultation document.
- 6.2.5 Finally, understanding of housing needs was updated in 2016, when an updated SHMA was completed (for the North London Housing Market Area, which comprises Barking and Dagenham, Havering, Newham and Redbridge), identifying that Objectively Assessed housing Need (OAN) equates to 2,132 dpa, or 31,977 dwellings over the plan period. This is almost double the target which is set in the London Plan (2015) of 1,123 dwellings per annum.

The 2014 Preferred Options Report Extension consultation

- 6.2.6 The **consultation document** was published from November to December 2014. The document explained that, whilst a preferred broad growth strategy had been identified and published for consultation in 2013 (i.e. within the Preferred Options Report, POR), by 2014 the Council had identified a need to give further consideration to alternative spatial approaches to distributing the required housing. Specifically, the report stated on page 1 that:

“This report stems from a statement made by the Cabinet Member for Planning and Public Protection at full Council in September 2013. The statement was made in the context of opposition to proposals to develop land at Oakfield, Barkingside for housing and community infrastructure in a garden suburb setting. The statement committed the Council to consider alternative strategies to meet the borough’s housing and infrastructure needs, should it be decided that Oakfield will not be designated as a development opportunity site.

This report therefore presents a number of possible strategies for discussion and debate so that the final choice is fully informed by the views of residents and other stakeholders and allows the borough to grow sustainably, that is in a way that balances the long term social, economic and environmental needs of the borough.”

- 6.2.7 The consultation document identified four spatial strategy options that, whilst not entirely mutually exclusive, could be considered mutually exclusive (i.e. ‘alternatives’) for the purposes of enabling structured analysis and debate. The alternatives were:
- 1) Proceed with the proposals as per the POR, including Oakfield
 - 2) Proceed with the proposals as per the POR, except with higher density redevelopment of King George & Goodmayes Hospitals & Fords Sports Ground to enable no Oakfield
 - 3) Proceed with the proposals as per the POR, except with higher density redevelopment within the Western Corridor (Woodford to Wanstead) to enable no Oakfield
 - 4) Proceed with the proposals as per the POR, except with additional Green Belt development (sites unspecified) to enable no Oakfield.

- 6.2.8 The Council chose not to publish a stand-alone **Interim SA Report** alongside the consultation document, but instead to present an appraisal of the four alternatives within an appendix (Appendix B). The appraisal identified that all options are associated with pros and cons, i.e. would involve a need to ‘trade-off’ between competing strategic objectives.

¹¹ Otherwise known as Further Alterations to the London Plan (FALP)

6.2.9 Specifically, the appraisal found...

Option 1 (the preferred option) to perform best in terms of: delivering community facilities; protecting the character of residential areas and conserving heritage assets; meeting housing need (on a par with Option 4, which would involve additional Green Belt allocation(s) in place of Oakfield); and ensuring good access / supporting sustainable travel choices (on a par with Option 3, which would involve additional development within the borough's western corridor, in place of Oakfield). However, the appraisal found Option 1 to perform least well in terms of preserving open spaces / natural areas and making best use of brownfield land (on a par with Option 2, which would involve doubling the density of redevelopment at the Goodmayes site, in place of Oakfield; and Option 4). The appraisal also highlighted that Option 1 performs best in terms of 'deliverability', given that the whole of the Oakfield site is owned by London Borough of Redbridge, and whilst there are some leases to the sporting clubs that currently occupy the site, there are no known major impediments to bringing it forward for redevelopment.

6.2.10 A large number of **consultation responses** were received as a result of the consultation, with key messages for organisations with a strategic remit including the following.

- English Heritage (now Historic England) suggested that Option 1 would cause least harm to the historic environment, although noted the need for further details in relation to archaeology. Other findings were:
 - Option 2 requires further details about the impact on the Little Heath Conservation Area and how it will inform development. Support is given to retaining the locally listed Goodmayes Hospital; and a heritage led approach to the development of the site.
 - Option 3 could involve piecemeal intensification of the western corridor, which could result in adverse impacts upon the historic environment; recognising the extent of Conservation Areas in this area.
 - Option 4 was difficult to comment upon, but it was noted that the Green Belt purpose to 'preserve the setting and special character of historic towns' should be considered; and more generally there is a risk of impacts to heritage assets, direct or indirect (e.g. setting).
- The Environment Agency highlighted that Option 2 would require the sequential test to be passed, and a Level 2 Flood Strategic Flood Risk Assessment and the exceptions test to be passed, due to the risk of flooding from Seven Kings water. Also highlighted was the need to consider the role of Green Belt sites (particularly within the Roding Valley) in terms of flood storage, taking into account climate change.
- Natural England had no substantive comments to make in relation to the alternatives, but highlighted Hainault Forest and Epping Forest as particularly sensitive assets; and highlighted the need to enforce accessible natural green-space standards.
- Sport England objected to Options 1 and 2 on the basis that there were no details of supply and demand in relation to playing pitches, nor details regarding what land would be used to replace lost playing pitches. Overall the suggestion was that either option would result in the unacceptable loss of playing field land and sports provision. Similar responses were also received from the London Playing Field Association; Essex Playing Fields Association and London Sport.
- The Highways Agency had no substantive comments to make in relation to the alternatives, but highlighted the need to manage down demand and reduce the need to travel, with infrastructure improvements on the Strategic Road Network only considered as a last resort.
- The Greater London Authority (GLA) had no substantive comments to make in relation to the alternatives, but highlighted that the level of public transport accessibility (both current and planned) should be a key factor in determining a site for future development.

- Transport for London acknowledged that Options 1, 2 and 3 would all ensure good accessibility to existing and proposed rail corridors. In respect of Option Four concern was expressed that there is generally an existing lack of public transport provision.
- The London Wildlife Trust supported the brownfield focus of Option 3, with a second preference for Option 1 so long as the playing fields are not relocated to Sites of Nature Conservation Importance on Fairlop Plain. Concern was expressed about the impact of Option 2 on a Site of Nature Conservation Importance.
- Thames Water responded that all options require discussion and further details of their size, location and phasing, any that developers would have to demonstrate how surface water would be adequately disposed of. They also raised concerns about the 'capacity' (presumably of water infrastructure) around South Woodford Underground, under Option 3.
- The Public Health section of the Council acknowledged the advantages and disadvantages of each option, but found overall that Option a has the most benefits (assuming alternative land to relocate the sports facilities nearby).
- LB Redbridge's 4 Conservation Advisory Panel concluded that Option 3 should be ruled out due to its potential impact upon the Conservation Areas in the west of the borough. Options 1 and 2 were favoured by a number of members.

6.2.11 It is also important to note that a large number of representations were received in relation to the Oakfield Playing Fields (Option 1), from organisations currently using the site and from local residents. Representations overwhelmingly objected to the Council's proposals on the grounds that Oakfield provides a valuable regional facility for sporting clubs (notably football and cricket) and recreational open space for local residents that should not be lost. A number of petitions were prepared, and notably Lee Scott MP presented to Parliament on 10th February 2015 a petition of the Save Oakfield Site (SOS) Campaign signed by approximately 5,000 people. The petitioners referred to the importance of the extensive facilities at Oakfield to a wide range of users, and suggested that loss would be contrary to the spirit of the Olympic Legacy and the objective of reducing obesity.

6.2.12 However, it is equally important to note that the consultation was not a referendum. In considering the outcomes of the consultation, the Council has had to have regard to the weight of the planning issues raised through the consultation having regard to strategic objectives, rather than simply the number of representations 'for' or 'against' each option.

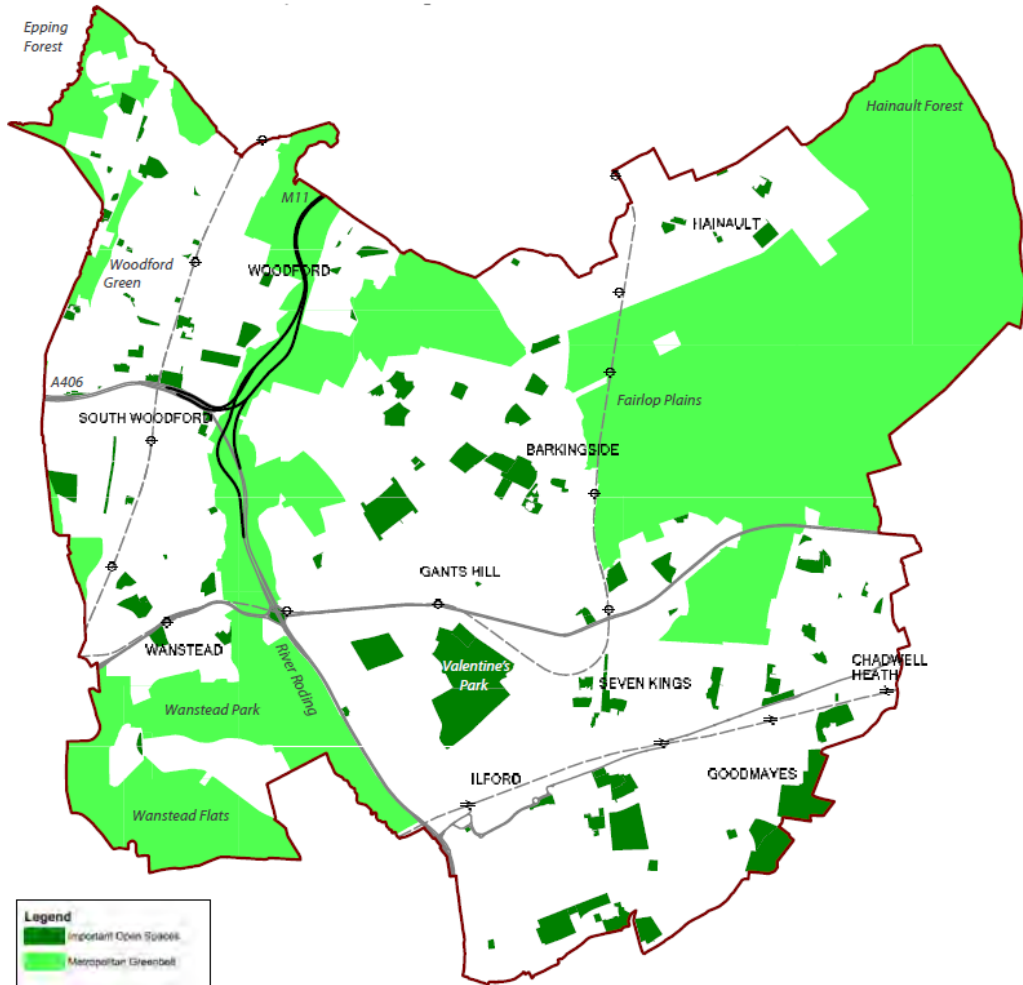
[The 2016 Green Belt Review](#)

6.2.13 Redbridge contains around 2,000ha of Green Belt – around 30% of the area of the borough. The Green Belt has been split into 16 parcels for the purposes of Green Belt Review, but more broadly can be split into roughly six areas - see **Figure 6.2**.

6.2.14 The 2016 Green Belt Review presents a review of all sixteen Green Belt parcels and the sites (within parcels) that have been promoted (by land-owners) for release from the Green Belt. It looks at those sites which could be appropriately removed from the Green Belt without materially compromising GB objectives.

6.2.15 In practice, the 2016 Green Belt Review involved systematically examining the findings of preceding Green Belt Review work - i.e. work in 2010, 2013 and 2015 to examine Green Belt parcels and specific sites within parcels - before reaching a conclusion on whether past findings still stand, or should be updated.

Figure 6.2: The Redbridge Green Belt (as it stands currently)¹²



6.2.16

The 2016 Review is generally consistent with the earlier Reviews, finding that a number of sites (see **Figure 6.3 and Table 6.1**) do not meet the Green Belt purposes and should be released. However, the 2016 Review concluded differently to earlier Reviews in respect of one site - *Land to the south of Billet Road* (parcel 14c) - finding that it should be released despite earlier reviews concluding that it should be retained. This site was first considered through the 2013 Green Belt Review (which was focused on examining sites promoted by developers through the 2013 POR consultation), and then subsequently the promoters submitted a revised site through the 2014 PORE consultation. This revised site was then subjected to Green Belt Review in 2015, with the conclusion reached that it should be retained. Subsequently, however, the Green Belt Review 2016 found the site suitable for release.

¹² Figure taken from Redbridge Characterisation Study, June 2014.

Figure 6.3: Green Belt parcels and sites identified as suitable for release by the Green Belt Review (2016)

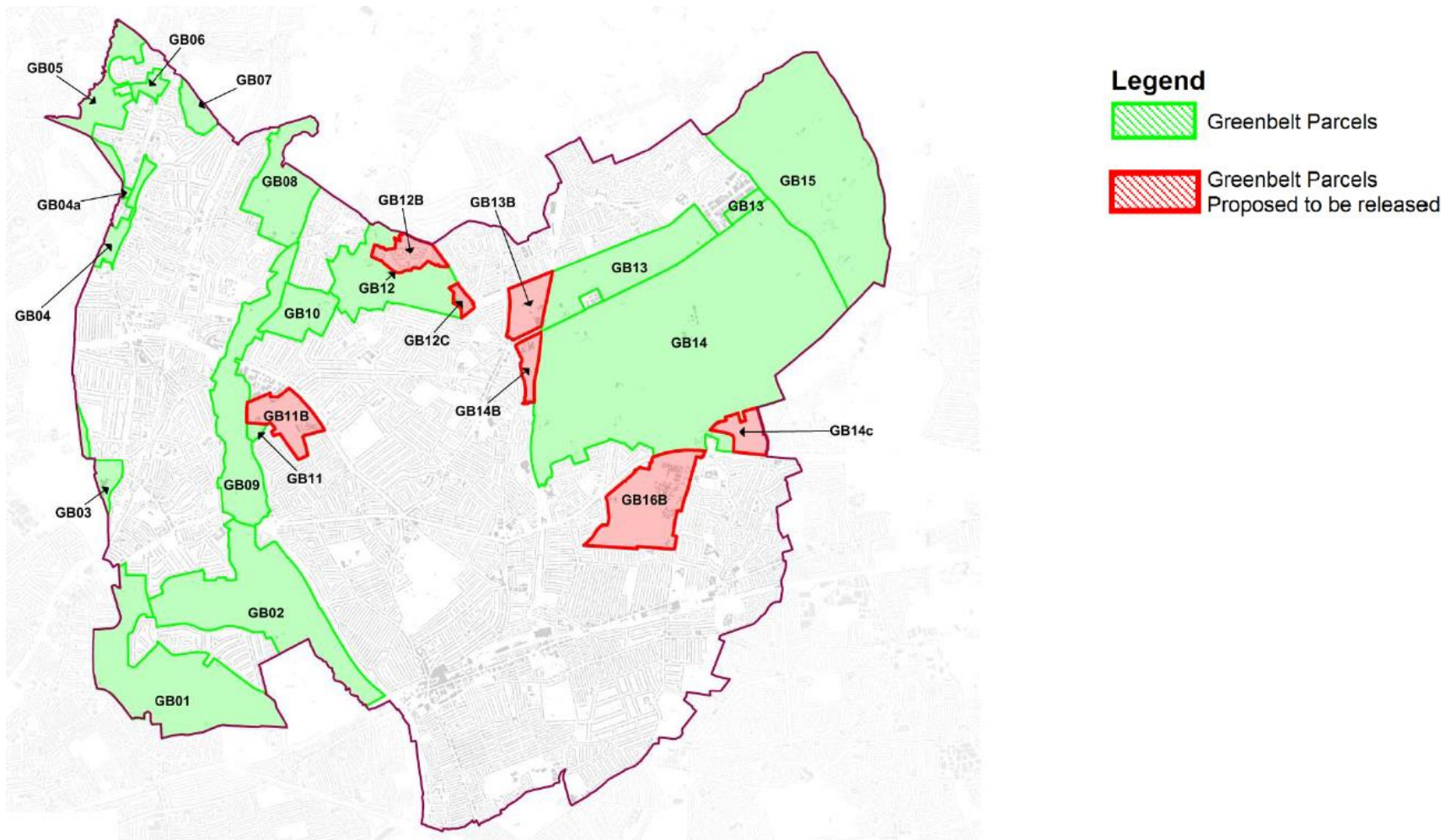


Table 6.1: Green Belt sites identified as suitable for release; and sites promoted but identified as unsuitable for release

Location	Site	GB Review finding [Should the site be released?]			
		2010	2013	2015	2016
GB02: Wanstead Park and surrounds	Site adjacent to Wanstead Pumping Station			No	
GB 11: Roding Hospital and surrounds	GB11b	Yes			
	Land to the south of Roding Hospital		No		
GB12: Claybury Hospital	GB12b	Yes			
	GB12c	Yes			
	Land to the east of Owen Gardens and west of Deacon Way		No		
	Land off Tomswood Hill		No		
	Guide Dogs for the Blind, off Manor Road			No	
GB13: Hainault Fields	GB13b	Yes			
GB14: Fairlop Plain	GB14b	Yes			
	GB14c		No		Yes
GB16: King George / Goodmayes Hospitals	GB16b	Yes			

6.3 The reasonable alternatives

Introduction

- 6.3.1 It was recognised that there was a need to develop and appraise (and ultimately consult upon) alternative spatial strategies that vary in terms of both ‘quantum’ (i.e. number of homes delivered within the plan period) and ‘distribution’.
- 6.3.2 This section considers the matters of ‘quantum’ and ‘distribution’ in turn, before then presenting the reasonable alternatives.

Quantum

- 6.3.3 The **London Plan target** for Redbridge is 1,123 dwellings per annum (16,845 homes for the plan period), taking into account land availability/suitability, and hence this is clearly a reasonable quantum option to explore.
- 6.3.4 There is no potential to deliver a lower growth quantum; however, there is a (reasonable) need to explore **higher growth options**. The National Planning Policy Framework (NPPF) requires the Council to plan to meet the full objectively assessed needs (OAN) for housing in the area, which in Redbridge’s case would mean planning for 2,132 homes per year, or 31,977 homes for the plan period (see discussion in Section 6.2, above). Delivering this level of growth would ensure that Redbridge contributes to addressing housing need within the sub-regional and London housing market areas (HMAs). However, the Council considers that delivering this level of growth is unreasonable, as an option, given land availability/suitability and the likelihood of significant conflicts with policy objectives relating to the protection of Green Belt, open space, employment land etc. As such, the Council determined it reasonable to consider higher growth options that would significantly exceed the London Plan target, but still involve not meeting OAN. Higher growth options of this nature would involve ‘closing the gap’ between housing supply and OAN, as required by the London Plan.

Distribution

- 6.3.5 Many aspects of the Council’s distribution strategy are firmly evidenced, and hence can be taken as a **‘given’** for the purposes of developing spatial strategy alternatives. In particular, it is a ‘given’, for the purposes of developing distribution alternatives, that -
- The Council’s five Investment and Growth Areas of Ilford, Crossrail Corridor, Gants Hill, South Woodford and Barkingside will accommodate much of the borough’s growth over the life of the plan period, recognising that they are highly accessible locations and associated with notable growth opportunities.
 - For example, in the case of Ilford, strong growth potential is recognised through its designation as an ‘Opportunity Area’ and Metropolitan Centre in the London Plan, and the town centre achieved Housing Zone status in 2015 which will bring accelerated housing development over the next ten years. Ilford already benefits from the highest levels of transport accessibility and is set to gain from the introduction of Crossrail which will bring around £70 million of direct public sector investment into the town centre.
 - There is a need to support redevelopment of all urban site options that are available and deliverable, as established through the London Strategic Housing Market Assessment (SHLAA, 2013), and subsequent site visits (the Council visited over 200 sites).
 - With regards to density of redevelopment - which is primarily a factor of building heights - it is generally appropriate to rely on London Plan policy (*however*, there is a need to consider the possibility of higher/lower densities in certain areas - see discussion below).
 - With regards to Green Belt sites, it is generally appropriate to rely on the findings of the 2016 Green Belt Review (*however*, there is a need to query certain findings; and more generally there is a need to consider the possibility of departing from Green Belt Review findings in order to deliver higher growth - see discussion below).

- 6.3.6 Having established these 'givens', it was recognised that the contentious spatial strategy issues - and thus the **variables** for the purposes of developing spatial strategy alternatives - could be taken to be:
- **Oakfield** (GB13b) - should it be allocated for c.600 homes, or not?
 - **King George & Goodmayes Hospitals & Fords Sports Ground** (GB16b) - should it be redeveloped at a relatively low density, or a higher density?
 - **Western Corridor** (Woodford to Wanstead) - should the opportunity sites be redeveloped at a relatively low density, or a higher density?
 - **Billet Road** (GB14c) - should it be allocated and if so at what density?
 - **Other Green Belt sites** - should the Local Plan reflect the Green Belt Review findings, or is there a need to relax some criteria within the Green Belt Review / identify additional 'least worst' sites for housing development?

- 6.3.7 This list of variables is very similar to that reflected in the alternatives developed, appraised and consulted on in 2014, at the time of the Preferred Options Report Extension (PORE) consultation. There are a number of points to make -

- There is one notable addition: namely **Billet Road**. The question of whether this site should be released from the Green Belt for development is potentially contentious, recognising that the Green Belt Review finding in 2016 contradicted the findings of earlier review. It may be that the conclusion reached regarding the site's contribution to Green Belt purposes is marginal, in which case there is a need to consider wider 'sustainability' pros and cons before a final decision is made on whether to release it for development.
- With regards to the **Western Corridor**, consideration was given to the possibility of removing this as a variable, i.e. taking low density redevelopment as a given. This is on the basis that the option of higher density development was found to have distinct draw-backs through appraisal and consultation in 2014, and more generally there is little in the way of local support for this option. However, in 2016 informal discussions with the Greater London Authority (GLA) highlighted that from their perspective they would wish to see redevelopment opportunities within transport corridors fully realised, ahead of Green Belt release, and so the decision was taken to keep the option of higher density development in contention.
- With regards to the matter of **Other Green Belt sites**, consideration was given to the possibility of removing this as a variable, i.e. taking it as a given that there is no potential to release sites not recommended for release by the Green Belt Review. This is on the basis that the new London Mayor, within his manifesto, supports the protection of the Green Belt, and a new London Plan may be forthcoming (thus providing a vehicle for considering Green Belt strategy). However, on balance it was thought best for this to remain as a variable, given that few other ways of delivering higher growth can be envisaged.

Establishing the reasonable alternatives

- 6.3.8 Having given consideration to housing quantum and distribution options, it was possible to establish the twelve reasonable alternatives presented in **Tables 6.2 and 6.3** below.

Table 6.2: Reasonable spatial strategy alternatives 2016 (summary)

Option	Quantum	Distribution <i>As per the preferred option, but with...</i>
1	Minimum growth (16,750 homes)	No Oakfield or Billet Rd
2	Lower growth 1 (17,350 homes)	No Billet Rd
3	Lower growth 2 (17,850 homes)	No Oakfield
4	Preferred Option (18,450 homes)	-
5	Variation on PO 1 (18,450 homes)	No Oakfield; Higher density at Goodmayes
6	Variation on PO 2 (18,450 homes)	No Oakfield; Higher density in Western Corridor
7	Variation on PO 3 (18,450 homes)	No Oakfield; Higher density at Goodmayes and Billet Rd
8	Variation on PO 4 (18,450 homes)	No Oakfield; Extra GB
9	Higher growth 1 (19,050 homes)	Higher density at Goodmayes
10	Higher growth 2 (19,050 homes)	Higher density in Western Corridor
11	Higher growth 3 (19,050 homes)	Extra GB
12	High growth (19,650 homes)	Extra GB

Table 6.3: Reasonable spatial strategy alternatives 2016

Spatial strategy option	Oakfield	King George & Goodmayes Hospitals & Ford Sports Ground*	Western Corridor	Billet Road	Green Belt site(s) that are not supported by GB Review**	Elsewhere	Total
1 Minimum growth (no Oakfield or Billet Rd)	0	1350	650	0	0	14,750	16,750
2 Lower growth 1 (No Billet Rd)	600	1350	650	0	0		17,350
3 Lower growth 2 (No Oakfield)	0	1350	650	1100	0		17,850
4 Preferred Option (PO)	600	1350	650	1100	0		18,450
5 Variation on PO 1 (No Oakfield; Higher density at Goodmayes)	0	1950	650	1100	0		18,450
6 Variation on PO 2 (No Oakfield; Higher density in Western Corridor)	0	1350	1250	1100	0		18,450
7 Variation on PO 3 (No Oakfield; Higher density at Goodmayes and Billet Rd)	0	1550	1250	1500	0		18,450
8 Variation on PO 4 (No Oakfield; Extra GB)	0	1350	650	1100	600		18,450
9 Higher growth 1 (Higher density at Goodmayes)	600	1950	650	1100	0		19,050
10 Higher growth 2 (Higher density in Western Corridor)	600	1350	1250	1100	0		19,050
11 Higher growth 3 (Extra GB)	600	1350	650	1100	600		19,050
12 High growth (Extra GB)	600	1350	650	1100	1200		19,650

* 'Goodmayes' is used as shorthand for King George & Goodmayes Hospitals & the Ford Sports Ground

** Undefined Green Belt site(s), assumed to be in the east of the borough (Fairlop Plain)

Final points regarding the reasonable alternatives

- 6.3.9 These were determined to be 'reasonable' alternatives on the basis that their appraisal should facilitate discussion of numerous important issues. Whilst it was recognised that there are **other spatial strategy options** that could potentially feature, there is a need to limit the number of alternatives in order to facilitate effective public engagement. Notably, whilst only one spatial strategy option (Option 7) is presented that would involve 1,550 homes at King George & Goodmayes Hospitals & Fords Sports Ground and/or 1,500 homes at Billet Rd, it is recognised that in practice there could be other spatial strategy options (i.e. 1,550 at King George & Goodmayes Hospitals & Fords Sports Ground and/or 1,500 at Billet Rd could feature as part of a higher growth option). The approach taken reflects the fact that Option 7 was identified relatively late in the plan-making process. Specifically, it was added after being put forward as a motion by Councillors at the Neighbourhood Services Committee on 26th May 2016.¹³
- 6.3.10 A final point to note relates to the assumed distribution of housing under those options that would involve 'Extra Green Belt', i.e. **Options 8, 11 and 12**. Whilst specific 'other sites' would ideally be defined, it is not clear that it is possible to take this step; other sites promoted all having been dismissed by the Green Belt Review on the basis that the land contributes to Green Belt purposes. However, it is possible to make certain spatial assumptions regarding the broad location of 'other Green Belt sites' that could potentially come into contention. Specifically, it is possible to make the assumption that it is the eastern, Fairlop Plain part of the borough's Green Belt (see Figure 6.2) where sites are most likely to 'come under pressure' for release. This is on the basis that sites to the west (i.e. in the Epping Forest area, along the Roding Valley, within the Wanstead Park Area or within the Wanstead Flats area) appear to be dismissed (as not suitable for release) by the Green Belt Review for quite clear and unambiguous reasons, often with clear reference to multiple purposes. It is recognised that no other sites within the Fairlop Plain are being actively promoted; however Green Belt release in the Fairlop Plain part of the Green Belt would nonetheless be a sensible and helpful assumption to make, for the purposes of developing, appraising and consulting on alternatives. The Green Belt Review explains how the land is "*generally open with some intervening vegetation along field boundaries*", which serves to highlight that any attempt to further realign the Green Belt and establish defensible boundaries would be challenging; however, it could feasibly be possible.

¹³ In June 2016, following the Neighbourhood Services Committee of 26th May 2016, consideration was given to possibility of refining 'the reasonable alternatives' to only those spatial strategy options being put forward by, and actively debated by, elected Councillors. In practice, this could have meant refining the reasonable alternatives to just options 4 and 7 (plus perhaps two more that reflect elements of options 4 and 7). It would have meant that no option featured that would involve: higher density development in the Western Corridor; no growth Billet Rd; 1,950 at King George & Goodmayes Hospitals & Ford Sports Ground; or 'extra' Green Belt release. This approach would have had the benefit of reducing the reasonable alternatives to a more manageable number; however, on balance it was thought best not to follow this approach, i.e. it was thought best to take the 12 alternatives presented above as 'the reasonable alternatives'. Despite not being a focus of member deliberations, there remains a strong argument for giving explicit consideration to, for example, spatial strategy options that would involve delivering 'higher growth'.

7 APPRAISING REASONABLE ALTERNATIVES

7.1 Introduction

7.1.1 The aim of this chapter is to present summary appraisal findings in relation to the reasonable alternatives introduced above. Detailed appraisal findings are presented in **Appendix III**.

7.2 Summary alternatives appraisal findings

7.2.1 **Table 7.1** presents summary appraisal findings in relation to the twelve alternatives introduced above. Within each row (i.e. for each of the objectives that comprise the SA framework) the columns to the right hand side seek to rank the alternatives in order of performance. Also, ' = ' is used to denote instances where the alternatives perform broadly on a par.

Table 7.1: Summary spatial strategy alternatives appraisal findings

Topic ¹⁴	Rank of performance / categorisation of effects											
	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7	Option 8	Option 9	Option 10	Option 11	Option 12
	Minimum growth No Oakfield or Billet Rd)	Lower growth 1 (no Billet Rd)	Lower growth 2 (no Oakfield)	Preferred Option	Variation on PO 1 (No Oakfield; Higher density at Goodmayes)	Variation on PO 2 (No Oakfield; Higher density in Western Corridor)	Variation on PO 1 (No Oakfield; Higher density at Goodmayes and Billet Rd)	Variation on PO 1 (No Oakfield; Extra Green Belt)	Higher growth 1 (higher density at Goodmayes)	Higher growth 2 (higher density in Western Corridor)	Higher growth 3 (extra GB)	High growth (extra GB)
Poverty	=	=	=	=	=	=	=	=	=	=	=	=
Crime	=	=	=	=	=	=	=	=	=	=	=	=
Housing	12	11	10	5	8	8	7	5	3	3	2	★1
Education	6	★1	6	★1	6	6	6	6	★1	★1	★1	★1
Services	★1	★1	★1	★1	11	11	10	★1	★1	★1	★1	★1
Health	★1	★1	★1	★1	11	11	10	★1	★1	★1	★1	★1
Land/town- scape	★1	★1	3	3	5	5	5	5	5	5	5	12
B'diversity	★1	★1	★1	★1	10	★1	9	★1	10	★1	★1	10
Traffic / transport	4	★1	4	★1	4	4	4	4	4	★1	4	4
Climate change	4	4	4	4	★1	4	★1	4	★1	4	4	4
Economy	=	=	=	=	=	=	=	=	=	=	=	=

¹⁴ N.B. These topics are derived from the 15 objectives that comprise the SA framework.

Table 7.1 (Cont'd): Summary spatial strategy alternatives appraisal findings

In conclusion, it is apparent that some options perform better than others, but that there is no obviously best performing / 'most sustainable' option.

Key considerations are as follows:

- **Poverty** - The alternatives perform on a par. Whilst certain options are better suited to the delivery of community infrastructure (see discussion below), it is not clear that there will be implications for poverty and social exclusion (recognising that the alternatives do not vary in terms of approach to growth in the south of the borough; where major benefits are set to be realised, most notably at Ilford). King George & Goodmayes Hospitals & the Ford Sports Ground is notable for being well linked to the Crossrail corridor, but it is not clear that this will translate into 'poverty and social exclusion' benefits.
- **Crime** - The alternatives perform on a par. Whilst certain options are better suited to the delivery of a high quality and legible urban realm (see discussion below, under 'townscape'), it is not clear that there will be implications for crime.
- **Housing** - In general, there is a need to deliver higher growth in order to more fully 'close the gap' between land supply and objectively assessed housing needs; also, there is a need to deliver an appropriate housing mix, in terms of type (family housing is needed) and tenure (affordable housing is needed). Options involving higher growth at 'King George & Goodmayes Hospitals & the Ford Sports Ground' or in the Western Corridor (Options 5, 6, 8 and 9) perform relatively poorly, given implications for the desired housing mix.
- **Education, services and health** - Oakfield is a growth location that performs well given its location (good access to Barkingside, public transport, leisure facilities and open space) and given potential to deliver a new school and health facility; albeit there remain some uncertainties in respect of re-providing for lost sports pitches (with no net loss in the quality of provision locally). Options involving higher growth at 'King George & Goodmayes Hospitals & the Ford Sports Ground' or in the Western Corridor (Options 5, 6, 8 and 9) perform relatively poorly, given issues around delivering community infrastructure.
- **Landscape/townscape** - There are clear sensitivities locally, and so lower growth performs well. Billet Road is assumed to be sensitive from a landscape perspective, given that past Green Belt Reviews have found the area to contribute to Green Belt purposes; the borough's Western Corridor is highly sensitive from a heritage perspective; higher density growth at 'King George & Goodmayes Hospitals & the Ford Sports Ground' would compromise design / urban realm objectives; and additional Green Belt development would clearly impact significantly on the Fairlop Plain's characteristic openness.
- **Biodiversity** - Higher density development at 'King George & Goodmayes Hospitals & the Ford Sports Ground' could place pressure on Seven Kings Water, which is an important ecological corridor (given potential for deculverting and restoration). Also, whilst much of the Fairlop Plain area comprises arable farmland likely to be of limited biodiversity value, it is noted that a significant area is farmed under an agri-environment agreement, plus there is a need to consider the possibility of growth in proximity to Hainault Forest SSSI impacting on the site's condition (which is 'unfavourable recovering').
- **Transport and traffic** - Whilst it is difficult to draw strong conclusions in the absence of detailed assessment, it is apparent that certain locations - notably Billet Road and Fairlop Plain, and to a lesser extent 'King George & Goodmayes Hospitals & the Ford Sports Ground' - are less well linked to existing centres and public transport.
- **Climate change** - There are a number of opportunities to deliver district heating infrastructure, and thereby minimise per capita greenhouse gas emissions from the built environment. One area where there is an identified opportunity is 'King George & Goodmayes Hospitals & the Ford Sports Ground', and hence it is assumed that options involving higher density at this site (Options 5 and 8) perform relatively well (as higher density development supports district heating viability).

8 DEVELOPING THE PREFERRED APPROACH

8.1 Introduction

8.1.1 The aim of this Chapter is to present the Council's response to the alternatives appraisal / the Council's reasons for developing the preferred approach in-light of alternatives appraisal.

8.2 The Council's outline reasons

8.2.1 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.

8.2.2 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.

8.2.3 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).

PART 2: WHAT ARE SA FINDINGS AT THIS CURRENT STAGE?

9 INTRODUCTION (TO PART 2)

9.1.1 The aim of this part of the report is to present an appraisal of the Draft ('Proposed Submission') Plan, as currently published under Regulation 19 of the Local Planning Regulations. Also, a final section presents 'conclusions at this current stage'.

10 APPRAISAL OF THE PROPOSED SUBMISSION PLAN

10.1 Methodology

10.1.1 The appraisal identifies and evaluates 'likely significant effects' of the draft plan on the baseline, drawing on the sustainability objectives identified through scoping (see Table 4.1) as a methodological framework. In total, there are 15 objectives relating to:

- Poverty
- Crime
- Housing
- Education
- Services
- Health
- Landscape/townscape
- Biodiversity
- Traffic
- Climate change
- Waste
- Economy
- Incomes
- Business
- Transport

10.1.2 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policies under consideration, and understanding of the baseline (now and in the future under a 'no plan' scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g. in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously, and explained within the text (with the aim is to striking a balance between comprehensiveness and conciseness/accessibility to the non-specialist). In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is possible to comment on merits (or otherwise) of the draft plan in more general terms.

10.1.3 Finally, it is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations.¹⁵ So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered, i.e. the potential for the draft plan to impact an aspect of the baseline when implemented alongside other plans, programmes and projects. These effect 'characteristics' are described within the appraisal as appropriate.

Adding structure to the appraisal

10.1.4 Whilst the aim is essentially to present an appraisal of 'the draft plan' under each of the SA objective headings, it is appropriate to also give stand-alone consideration to elements of the draft plan. As such, within the appraisal narratives below, sub-headings are used to ensure that stand-alone consideration is given to distinct elements of the draft plan, as appropriate (recognising that not all elements of the plan have implications for all sustainability objectives). A key sub-heading is that which deals with 'Promoting and managing growth' element of the plan, including the proposed growth strategy (see **Figure 10.1** and **Table 10.1**).

¹⁵ Environmental Assessment of Plans and Programmes Regulations 2004

Figure 10.1: The Redbridge Local Plan Key Diagram



Table 10.1: Proposed housing growth strategy, by broad area and by 'phase'

Investment Area	Phase 1	Phase 2	Phase 3	TOTALS
Period	2015-2020	2021-2025	2026-2030	
1) Ilford	4,180	991	744	5,915
2) Crossrail Corridor	1,141	2,780	766	4,687
3) Gants Hill	189	166	132	487
4) South Woodford	88	412	151	651
5) Barkingside	417	335	655	1,407
Rest of the Borough	833	887	907	2,627
TOTALS	6,848	5,571	3,355	15,774
Windfall	0	1,350	1,350	2,700
TOTALS with windfall	6.848	6,921	4,705	18,474

10.2 Poverty

Reduce poverty and social exclusion

Promoting and managing growth

- 10.2.1 As part of the Vision for Redbridge, the Local Plan states that there is an aim for Redbridge to “*be an exemplar borough of how joined-up approaches to regeneration and investment can maximise opportunities to deliver a range of new housing, jobs and community infrastructure for local people*”. In this respect, the plan promotes and manages regeneration through a number of investment and growth areas.
- 10.2.2 The Ilford Investment and Growth Area (outlined by LP1A) is a key aspect to the delivery of regeneration in Redbridge. Given that the wards in and to the south of the town centre are among the 20% most deprived in London, focusing growth in Ilford is likely to result in positive effects in terms of reducing poverty and social exclusion.
- 10.2.3 Additionally, policy LP1B sets out the Crossrail Corridor Investment and Growth Area, which is also to experience significant growth, in line with the Crossrail link development that is expected to act as a catalyst for economic growth and attract new business. In turn this may result in further positive effects in terms of reducing poverty.¹⁶
- 10.2.4 However, urban regeneration can be contentious issue. Concerns in the local community can arise for a range of factors, often due to the loss of affordable housing, and an increase in commercial rents which reduce the affordability of a location. These issues will in part be mitigated through LP3 ‘Affordable Housing’ which seeks to maximise the provision of affordable housing in the borough by setting a strategic affordable housing target of 30%.

Promoting a green environment

- 10.2.5 Overall, aspects of the plan focussed on promoting a green environment and other environmental issues are not directly relevant to addressing poverty and social exclusion. Policy LP20 ‘Low Carbon and Renewable Energy’ may indirectly positively contribute to poverty reduction through lower energy bills for young and elderly people; however, these policies are likely to have minimal effects in terms of poverty and social exclusion.

Achieving quality design

- 10.2.6 Overall, aspects of the plan focussed on promoting quality design are not directly relevant to addressing poverty and social exclusion. However, there are policies present which have indirect and minor positive effects, e.g. policy LP26 ‘Promoting High Quality Design’, which requires that development will observe “*best practice in energy efficiency and climate change mitigation*”. Increases in energy efficiency of buildings may translate into monetary savings for residents, having positive effects in terms of reducing poverty. However, overall as stated, policies addressing design issues are likely to only have minimal effects.

Managing and enhancing the borough’s assets

- 10.2.7 A number of plan policies which pertain to the Redbridge assets could have direct effects for social exclusion. Of particular note is LP35 ‘Protecting and Enhancing Open Spaces’, which sets out the Council’s aim to enhance the quality of, and improve access to, green spaces within the borough. Green spaces contribute towards the quality of life for residents and can provide a focal point for healthy exercise and community interaction. As such, this policy is likely to have directly positive effects in terms of reducing social exclusion.

¹⁶ Redbridge has seen a decrease in the number of children under 16 living in poverty. In 2012 the rate was 19.3% (a fall of 5.7% from 2010). The working age employment rate for ethnic minorities in the borough is 62.2%, with unemployment rate at 10.2%. The employment rate is higher for ethnic minority males at 75% than for females at 49.8%. Additionally, the assessment identifies that the unemployment rate is higher for females (11.8%; 7,500) than for males (6.2%; 5,000).

The draft plan ‘as a whole’

- 10.2.8 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.

10.3 Crime

Reduce and prevent crime and the fear of crime

Promoting and managing growth

- 10.3.1 Crime may be addressed through town centre enhancements at the four Investment and Growth Areas. In particular, growth proposed at the Ilford Investment and Growth Area (LP1A) may have a positive transformational effect on the town due to its proximity to wards (south of the town centre) which are among the 20% most deprived in London. However, there is little potential for direct effects, and overall effects are likely to be minor.

Promoting a green environment

- 10.3.2 There is no clear, direct link between ‘green environment’ policies and crime so it is unlikely that these policies will have any positive or negative effects in terms of reducing crime or fear of crime.

Achieving quality design

- 10.3.3 Policy LP26 ‘Promoting High Quality Design’ sets out that the council will “*require good design and ‘place making’, and will seek high quality design in all development within the borough*”. As part of this policy the council requires that development “*is designed to minimise crime and antisocial behaviour, creating safe and secure environments*”. In principle, this policy is likely to have positive effects in terms of reducing crime and fear of crime as it will encourage greater natural surveillance within locations, particularly in the evenings, which is a real concern to older people. However, it is not possible to predict the significance of this effect; indeed, this policy could be strengthened further by stating design measures which would be expected to be undertaken.

Managing and enhancing the borough’s assets

- 10.3.4 There is potential for a number of policies to have positive transformational effects on the public realm, such as LP35 ‘Protecting and Enhancing Open Spaces’ which sets out the councils aim to protect and enhance the quality of existing green spaces and also improve access to these. Also, policy LP37 ‘Green Infrastructure and Blue Ribbon Network’ includes aims to maintain and enhance accessibility to existing parks and open spaces and to “*prioritise the provision of publicly accessible open space in new developments*”. These policies are likely to encourage community use of public space and may increase both perceived and actual levels of safety for residents – in particular for women with families who spend a proportionately higher amount of time in public spaces.¹⁷ However, these effects will be both indirect and minor.

The draft plan ‘as a whole’

- 10.3.5 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 again have positive but minor effects in terms of crime reduction. It is *recommended* that that design policy LP26 ‘Promoting High Quality Design’ is strengthened further by stating design measures which would be expected to be undertaken.

¹⁷ Redbridge Equality Impact Assessment 2016.

10.4 Housing

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

Promoting and managing growth

- 10.4.1 The London Plan (2015) sets a housing target of 16,845 homes over the plan period. Policy LP2 'Delivering Housing Growth' commits to meeting this target, with the supporting text confirming that the plan is in fact to provide for a quantum of homes in exceedance of this target (18,774). However, it remains the case that the plan is to provide for a quantum of homes well below the number identified as necessary in order to meet objectively assessed needs in full (31,977).¹⁸
- 10.4.2 In terms of the spatial strategy, Ilford and Crossrail Corridor Investment Areas are expected to see the highest levels of housing growth, at totals of 5,915, and 4,687 homes respectively. As accessible locations, well connected to the public transport network, demand for housing in these areas is high (albeit housing *need* is not well understood at sub-borough scale).
- 10.4.3 A number of policies are in place to ensure that housing development meets the full range of needs that exist locally. This includes policy LP4 'Specialist Accommodation', which sets out the councils aim to support older, vulnerable and homeless residents in independent living through appropriate development, including temporary accommodation.
- 10.4.4 Policy LP3 'Affordable Housing' seeks to maximise the provision of affordable housing in the borough by setting a strategic affordable housing target of 30%; while policy LP5 'Dwelling Mix' requires developments to provide a range of dwelling sizes and tenures, particularly focusing on the provision of larger family sized homes. Black and Minority Ethnic (BME) groups are disproportionately more likely to be living in poverty and overcrowded homes, thus increasing the size of homes will benefit BME groups in the borough. However, this could have a negative effect on younger people entering the housing market as this may restrict the supply of smaller and more affordable non self-contained housing options.
- 10.4.5 Policy LP8 ensures that the needs of Travellers are met. It states this will be done by: *"Retaining and Protecting the existing Gypsy and Traveller site at Forest Road Site; and supporting intensification of the site to provide up to 7 additional pitches to meet identified need"*.

Achieving quality design

- 10.4.6 Numerous policies are likely to have positive effects in terms of housing quality. These include: LP26 'Promoting High Quality Design' which, amongst a series of detailed aims stipulating development requirements, includes a number of requirements which relate to housing. Of key note is the requirement that development *"provides high standards of accommodation for housing in terms of size, quality and arrangement of internal space"*.
- 10.4.7 Additionally, policy LP29 'Amenity and Internal Space Standards' sets out the requirements for amenity space for private dwellings, including specified minimum requirements. This is likely to have positive effects for achieving high quality homes.

The draft plan 'as a whole'

- 10.4.8 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.

¹⁸ OAN has been established by the Outer North East London Strategic Housing Market Assessment (SHMA).

10.5 Education

Improve the education and skill of the population overall

Promoting and managing growth

- 10.5.1 There are 71 schools in Redbridge and it is estimated that 16 additional primary school forms of entry and 54 secondary school forms of entry will be required over the life of the local plan. This is in addition to the capacity that will be provided as part of planned expansion to existing schools to 2017/18.
- 10.5.2 Policy LP1 ‘Spatial Development Strategy’ states that the Council will use both Community Infrastructure Levy (CIL) and newly sought developer contributions towards the provision of, but not limited to, educational infrastructure. This is supported by all five Investment and Growth Area policies (LP1A ‘Ilford Investment and Growth Area’; LP1B ‘Crossrail Corridor Investment and Growth Area’; LP1C ‘Gants Hill Investment and Growth Area’; LP1D ‘South Woodford Investment and Growth Area’; LP1E ‘Barkingside Investment and Growth Area’) which stipulate that the Council will provide new educational infrastructure in these areas of Redbridge. In particular, the Crossrail Corridor area will provide 3 new minimum 8 form entry secondary schools and develop the already present Redbridge College site for new and improved further education facilities; and the Barkingside area will provide a new minimum 8 form entry all through school at Oakfield, which were included in the projects identified in the Council’s 2016 Infrastructure Delivery Plan (IDP).
- 10.5.3 Additionally, policy LP16 ‘Skills and Training’ will seek to address unemployment of all community groups by facilitating training opportunities for local residents by “(b) supporting the location of higher and further education establishment within the borough to provide new training opportunities for local residents” and “(e) securing financial contributions from development that results in a net loss of employment floorspace to invest in training and other initiatives that seek to promote employment and adult education in the borough”. Policy LP17 ‘Delivering Community Infrastructure’ also states that the Council will support and facilitate the “(1e) expansion of existing schools and health facilities where a clear need can be demonstrated”.

Promoting a green environment

- 10.5.4 Aspects of the Plan focussed on promoting a green environment and other environmental issues are not directly relevant to improving the borough’s education and skill level. However, the draft Plan does make reference to changing the school community’s travel behaviour through sustainable transport modes in policy LP22 ‘Promoting Sustainable Transport’, which would “bring about a healthier, safer and more environmentally conscious school community”.

Managing and enhancing the borough’s assets

- 10.5.5 Aspects of the Plan focussed on managing and enhancing the borough’s assets are not directly relevant to improving the borough’s education and skill level. However, policy LP35 ‘Protecting and Enhancing Open Spaces’ makes reference to the importance of protecting, enhancing and improving access to green spaces for, but not limited to, play and sports including schools, which is important for the complete learning curriculum of students.

The draft plan ‘as a whole’

- 10.5.6 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.

10.6 Services

Provide accessible community services and leisure opportunities

Promoting and managing growth

- 10.6.1 The draft Plan states that *“New community facilities can generate a high number of trips with significant localised transport and environmental impacts and as such should be located within the borough’s most accessible locations: its town centres”* and *“will only support development community facilities outside of town centres in exceptional circumstances and where it meets and identifiable and long-term need that is not being met elsewhere in the area or capable of being met in town centre locations”*.
- 10.6.2 The areas with the highest public transport accessibility are in the Council’s Investment and Growth Areas. Policy LP1 ‘Spatial Development Strategy’ directly addresses services in the promotion and management of the borough’s growth by both utilising the Community Infrastructure Levy (CIL) and seeking developer contributions towards the *“provision of new social infrastructure”*. The five Investment and Growth Areas identified in the draft Plan (LP1A–E) are all situated in well-connected positions (i.e. in close proximity of existing/proposed transport links) and will each provide their own infrastructure improvements (such as for cycle routes and London Underground stations); further enhancing the connectivity of the borough to key community services.
- 10.6.3 For example, the Barkingside Investment and Growth Area (LP1E) will provide improvements to Redbridge cycling infrastructure and pedestrian links to Fairlop Waters and Hainault Forest Country Park, and improvements for community services such as Fullwell Cross Library, Fullwell Cross Leisure Centre and Barkingside Recreation Ground; thus showing a commitment to providing more accessible community services and leisure opportunities in Redbridge. Furthermore, Redbridge Sports Centre in Oakfield will be upgraded in order to *“transform it into a major regional sports hub”*.
- 10.6.4 Policy LP4 ‘Specialist Accommodation’ is intended to support older, vulnerable and homeless residents in the borough by providing accommodation that *“offers easy access to community facilities, is accessible to public transport, workplaces, shops and services appropriate to the needs of the intended occupiers”* which is key to their general health and wellbeing. Likewise, policy LP8 ‘Gypsies and Travellers’ states that the Council will only permit gypsy and traveller sites that, amongst other criteria, relate to *“existing communities and accessible local services and facilities, such as shops, primary and secondary schools, healthcare and public transport”*.
- 10.6.5 LP9 ‘Ensuring the Future Vitality and Viability of Town Centres’ states that the Council will promote the regeneration of the borough’s town centres vitality and viability by *“improving access to town centres by a choice of means of transport, particularly sustainable modes such as public transport, cycling and walking”*. Additionally, this is supported by LP10 ‘Managing Town Centres and Retail Uses’ which states the Council will *“resist development that harms the safety and traffic flow or increases traffic and parking problems in the town centre”*, further emphasising the importance of protecting the accessibility of community services in town centres.
- 10.6.6 LP17 ‘Delivering Community Infrastructure’ will support and facilitate the *“expansion of existing schools and health facilities where a clear need can be demonstrated”* and will resist the *“loss of existing lawful community infrastructure”*. These policies, and others, are intended to support existing and new community infrastructure in areas of good accessibility in order to create community hubs offering a range of services.
- 10.6.7 Overall, the policies relating to the promotion and management of growth fully consider the needs of existing and projected residents, identifying that growth in the borough must be in areas that are accessible and which have sufficient community services and leisure opportunities.

Promoting a green environment

- 10.6.8 Aspects of the Plan focussed on promoting a green environment and other environmental issues are not directly relevant to addressing the borough's services. However, indirectly, policy LP22 'Promoting Sustainable Transport' is intended to enhance sustainable transport links (i.e. cycle, bus and London Underground routes) for residents to access various community services and leisure facilities, with LP23 'Cycle and Car Parking' supporting the local sustainable transport schemes with regards to sufficient cycle and car parking..

Managing and enhancing the borough's assets

- 10.6.9 Green Infrastructure can benefit physical and mental health by creating more opportunities for play, sport, walking and cycling. Policy LP34 'Managing and Protecting the borough's Green Belt and Metropolitan Land' makes commitment for the Council to support development which *"improves access to Green Belt areas for beneficial uses such as outdoor sport and recreation where there is no conflict with protecting the openness of such land"*. For example, the Council will seek to enhance the accessibility and opportunities on Fairlop Plain, in particular recreational facilities at Fairlop Waters. Policy LP37 'Green Infrastructure and Blue Ribbon Network' states the Council will *"revise its Infrastructure Delivery Plan annually to provide an up-to-date assessment of the need for all types of community infrastructure"*, enhancing the borough's green infrastructure and improving the green links between open spaces.

The draft plan 'as a whole'

- 10.6.10 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.

10.7 Health

Promote healthy lifestyles

Promoting and managing growth

- 10.7.1 With regards to the Investment and Growth Areas, the draft Plan states that the Council *"aims to maximise the diversity and potential of the borough's community's assets, to create places that promote health and well-being for all"*. Reducing obesity levels¹⁹ in Redbridge is also a priority for the borough's Health and Well-being Strategy. The draft Plan states that *"a diverse range of community facilities helps to enhance quality of life and social cohesion, improve personal health and well-being [of residents]"*. Policy LP18 'Health and Well-Being' is the primary policy that tackles health and well-being of Redbridge's residents. The policy states that *"measures that will help contribute to healthier communities and reduce health inequalities must be incorporated in a development where appropriate"* and that *"proposals for major development schemes to include a Health Impact Assessment (HIA)"*. The Plan states that the Council will contribute towards the health priorities of the Redbridge Health and Wellbeing Board and partners to help reduce health inequalities across the borough and will support the provision of new or improved health facilities, in line with Redbridge's Clinical Commissioning Group and NHS England requirements; and protect existing health facilities.

¹⁹ One fifth (21%) of children aged 4-5 years and over a third (39%) of children aged 10-11 years are overweight obese (2014/15); an increase from 2013/14. It is estimated that 55% of adults are either overweight or obese.

- 10.7.2 This is reinforced by policy LP17 'Delivering Community Infrastructure' which states that the Council will support growth with appropriate community infrastructure by supporting and facilitating the expansion of health facilities *"where a clear need can be demonstrated"*.
- 10.7.3 Policy LP4 'Specialist Accommodation' makes requirements for accommodation of the elderly, vulnerable and homeless that "offers easy access to community facilities, is accessible to public transport, workplaces, shops and services appropriate to the needs of the intended occupiers". Accessibility of community services (such as shops, health facilities) to people of special requirements is key to their general health and well-being and for independent living, which promotes healthier lifestyles.
- 10.7.4 The Council considers that in the interests of the health of the borough's residents, particularly children, the proliferation of land use class A5 needs to be carefully managed, and as such policy LP11 'Managing Clustering of Town Centre Uses' seeks to tackle the concentration of these shop types (e.g. hot food takeaways, shisha bars) that are considered to affect health and obesity levels. The policy seeks to restrict the proximity of such shop types to schools, youth centres and parks to discourage unhealthy living for the borough's youth. Additionally, this may have a negative impact upon black or Asian minority groups in the borough whom are often operators of these type of uses; however the overall focus on increased health will impact positively on all residents in the borough regardless of race²⁰.
- 10.7.5 The Plan acknowledges that health shouldn't be regarded as an isolated topic when assessing planning applications; rather it should be incorporated with the wider planning matters. The draft Plan policies have therefore been developed to ensure the determinants of health are captured, ensuring the physical and mental health and well-being of those living, working and visiting the borough is addressed.

Promoting a green environment

- 10.7.6 As part of the Council's green environment policies, LP22 'Promoting Sustainable Transport' states that the Council will *"deliver a more sustainable and efficient transport network that supports growth and a prosperous economy, reduces car dependency, encourages sustainable forms of transport, improves air quality and reduces greenhouse gas emissions"*. The policy also makes a requirement for the Council to *"actively encourag[e] walking and cycling by providing an attractive public realm, safe, convenient and accessible cycle and footpath networks"*. As stated, the deliverance of more sustainable transport links (i.e. rail, cycle, walking) in the borough will encourage residents to become more active and less dependent upon private vehicle use (i.e. *"promoting a model shift"*) which also decreases air quality and thus overall health of residents. Both the Redbridge Walking Strategy (2012) and the Council's Cycle Strategy reinforce the intentions described in LP22.
- 10.7.7 The Plan recognises that *"improving local air quality, mitigating the impact of development on air quality and reducing exposure to poor air quality in the borough is vital in safeguarding public health and the environment"*. As with all London boroughs, the whole of Redbridge is designated as an Air Quality Management Area which requires the Council to comply with the Government's air quality objectives. LP24 'Pollution' identifies that the Council will *"ensure that the health of Redbridge residents aren't jeopardised through exposure to pollutants or other hazardous substances"* and that developments will require an Air Quality Assessment for certain criteria (e.g. if the development is likely to have significant and harmful impact on air quality through the construction and/or operational phases).

²⁰ Redbridge Equality Impact Assessment 2016.

Achieving quality design

- 10.7.8 Aspects of the Plan focussed on achieving quality design are not directly relevant to addressing the borough's business success. However, there is an indirect effect resulting from LP32 'Sustainable Design and Construction' that will contribute to reducing vehicle use in the borough through promoting zero carbon development.

Managing and enhancing the borough's assets

- 10.7.9 Open spaces in the borough function as "*green lungs*" that provide a focal point for healthy exercise and community interaction which all contribute to improving health and well-being, and as such there is support for "*the multifunctional use of open spaces for play, sport and recreation*". Green Infrastructure can benefit physical and mental health by creating more opportunities for play, sport, walking and cycling and thus policy LP37 'Green Infrastructure and Blue Ribbon Network' also stipulates that the Council will "*improve linkages to the borough's regionally significant open spaces at Epping Forest, Fairlop Country Park, Hainault Country Park and the Roding Valley*".
- 10.7.10 Similar to green/open spaces, allotments are acknowledged as providing a "*valuable open space experience for users... improving health and well-being*", and are referenced in LP36 'Allotments and Local Produce'. The policy states the Council will "*resist development on allotment land*" (unless there is no longer a demand for it or if existing allotment users can be reasonably located elsewhere) and "*promot[e] investment and improvements to all existing allotments in the borough, particularly at reserve sites at Uplands and Wanstead Park Road to bring them back into use*".

The draft plan 'as a whole'

- 10.7.11 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.

10.8 Landscape / townscape

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

Promoting and managing growth

- 10.8.1 There are likely to be net improvements to townscapes located within the Council's five Investment and Growth Areas of Ilford, Crossrail Corridor, Gants Hill, South Woodford and Barkingside (LP1A–E). In particular, improvements will be delivered through key infrastructure developments outlined in the five Investment and Growth Area policies.

10.8.2 Within the South Woodford Investment and Growth Area, policy LP1D highlights that the preservation and enhancement of the George Lane and South Woodford Conservation Areas will be a key infrastructure project. Although these Conservation Areas would still enjoy protection in the absence of this policy, it will provide an extra level of impetus to stimulate further enhancement and therefore, this policy will be likely to result in positive effects in terms of townscape character and features. Generally, prominent heritage assets in an area will help to foster civic pride and contribute positively to the community.²¹

10.8.3 Within the Barkingside Investment and Growth Area, policy LP1E outlines a project to improve cycling infrastructure and pedestrian links to Fairlop Waters and Hainault Forest Country Park. While this in itself will not enhance the landscape of the area, it will create positive benefits in terms of accessibility to, and the enjoyment of these parks, and also help to minimise traffic.

Achieving quality design

10.8.4 Aspects of the plan pertaining to design quality are likely to have significant effects in terms of landscape and townscape features. Policy LP26 'Promoting High Quality Design' requires that development is of high landscape design quality; while policy LP33 'Heritage' provides for the conservation, protection and enhancement of heritage assets – including a prioritisation for conservation of heritage assets when considering the overall impact of development proposals on their significance and importance.

10.8.5 Despite Conservation Area status, development undertaken via permitted development can erode and undermine the character and appearance of such areas. This could include cumulative effects from changes to windows, doors, or roofs of properties. In this regard, policy LP33 will provide considerable additional protection for the borough's Conservation Areas, in combination with the Council's stated aim to continue to monitor development within these areas.

Managing and enhancing the borough's assets

10.8.6 Numerous policies within this section of the plan will contribute to the management and enhancement of the borough's landscape and townscape. Notably, policy LP34 'Managing and Protecting the borough's Green Belt and Metropolitan Land' sets out the council's aim to protect designated Green Belt and Metropolitan Open Land (as defined on the Policies Map). This has a range of purposes, however those which are relevant to townscape and landscape character include; checking the unrestricted sprawl of Greater London and preventing the merging of: Woodford Green with Woodford Bridge, Wanstead with Ilford and Aldersbrook and Barkingside with Hainault; and preserving the setting and special character of Aldersbrook, Snaresbrook, Woodford and Wanstead.

10.8.7 Other policies with positive implications are -

- Policy LP35 'Protecting and Enhancing Open Spaces' sets out the council's aim (amongst others) to ensure improvement, enhancement and management which will improve quality and access to existing green spaces, as well as maintaining the supply of new open space to meet the needs of the borough's growing population.
- Policy LP38 'Protecting and Enhancing the Landscape' outlines the council's aim to support development which integrates trees and other landscape features in design and layout.

²¹ Redbridge Equality Impact Assessment 2016.

The draft plan 'as a whole'

- 10.8.8 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.

10.9 Biodiversity

Maintain and enhance biodiversity, species and habitats

Promoting and managing growth

- 10.9.1 Biodiversity is referenced in two policies - LP7 'Back Gardens' and LP8 'Gypsies and Travellers'.
- LP7 is intended to protect gardens from unnecessary development, recognising that *"gardens are a key part of the green infrastructure of the borough"* and that *"the cumulative impact of the loss of gardens would cause the gradual degradation of the character and appearance of the borough and have an adverse impact on biodiversity"*.
 - Policy LP8 restricts the use of designated nature and conservation sites (e.g. SSSI, Green Belt, Site of Local Nature Conservation Importance) for temporary and permanent gypsy/traveller sites due to previous experience of loss of Green Belt (e.g. Forest Road in Fairlop) from gypsy/traveller sites.
- 10.9.2 Biodiversity is not a focus of area specific policies; however, this may be broadly appropriate given that issues/opportunities are limited. Proposals for 'King George & Goodmayes Hospitals & the Ford Sports Ground' could place pressure on Seven Kings Water, which is an important ecological corridor (given potential for deculverting and restoration); however, development management policy is in place (notably LP39 'Nature Conservation and Biodiversity') to ensure that issues/opportunities feature in decision-making.

Promoting a green environment

- 10.9.3 There are no policies promoting a green environment that directly address biodiversity. However, policies LP21 'Water and Flooding' and LP24 'Pollution' may have minor positive effects, given a focus on pollution preventions. The policy is to resist development that *"poses unacceptable risk to the quality of the water catchment, groundwater or surface water... reducing the runoff of particulates and other forms of biological and chemical pollution to waterways"*.

Achieving quality design

- 10.9.4 There are no direct policies in the Plan that address biodiversity through quality design. However, there are policies that address 'green infrastructure' and green/open spaces, which can positively affect biodiversity. Policy LP32 'Sustainable Design and Construction' requires development proposals to adopt climate change adaptation measures by (amongst other things) *"protecting existing green open spaces"* and incorporating *"green roofs where appropriate"*. Guidance (e.g. Mayor of London's 'Living Roofs and Walls – Technical Report') identifies that green roofs *"conserve and enhance biodiversity"* and can support priority London Biodiversity Action Plan species.

- 10.9.5 Additionally, policy LP26 ‘Promoting High Quality Design’ requires that development includes *“high quality hard and soft landscaping... and opportunities to introduce green urban design solutions are optimised”*. This policy should ensure that soft landscaping techniques (e.g. tree and shrub planting) are included in future development proposals, with benefits for biodiversity.

Managing and enhancing the borough’s assets

- 10.9.6 The borough’s assets include various green and open spaces, with approximately 30% (2,000ha) of the borough designated as Green Belt. LP39 ‘Nature Conservation and Biodiversity’ and LP35 ‘Protecting and Enhancing Open Spaces’ will play a key role in conservation of biodiversity hot-spots; furthermore policy LP37 ‘Green Infrastructure and Blue Ribbon Network’ will play an important role.
- 10.9.7 Trees also play an important role in providing habitats for species and thus supporting biodiversity in the borough. Policy LP38 ‘Protecting Trees and Enhancing the Landscape’ relates to the matter of retaining trees and other landscape features within new developments, recognising retention value, contribution to local character and amenity, and ecological value.

The draft plan ‘as a whole’

- 10.9.8 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.

10.10 Traffic

Reduce the effect of traffic on the environment

Promoting and managing growth

- 10.10.1 Policies LP10 ‘Managing Town Centres and Retail Uses’, LP11 ‘Managing Clustering of Town Centre Uses’ and LP17 ‘Delivering Community Infrastructure’ are all directed at preventing the generation of additional traffic numbers to town centres and reducing overall traffic flow in the borough. The Council will support development that does not have an *“undue impact on... traffic disturbance”* and resist those that *“undue impact on the amenity of... the highway network”*. The policies also take account of Crossrail, which will provide a new transport link (the Elizabeth Line) within and out of the borough. The new line will support the use of non-vehicular modes of transport in the borough, such as cycling and walking.
- 10.10.2 With regards to area specific policy, whilst there is a focus on preventing increased traffic (through modal shift and reduced need to travel), there is limited focus on how residual increases in traffic might be mitigated. This may be broadly appropriate - recognising that policy LP41 ‘Delivery and Monitoring’ has a clear focus on infrastructure delivery; however, it does serve to highlight the importance of on-going monitoring.

Promoting a green environment

- 10.10.3 Policy LP22 'Promoting Sustainable Transport' supports reduced car dependency in Redbridge and "*actively encourag[e] walking²² and cycling²³ by providing an attractive public realm, safe, convenient and accessible cycle and footpath networks*". There is also a commitment to "*resisting new development that results in an unacceptable adverse impact on traffic congestion within the Local and Strategic Road Network or public transport system*".

Achieving quality design

- 10.10.4 Overall, aspects of the Plan focussed on achieving quality design are not directly relevant to addressing the borough's traffic. There is one policy (LP28 'Advertising Devices and Shop Fronts'), however, regarding shop signs interfering with traffic signs. Notwithstanding, overall the policies addressing quality design are likely to have minimal effects.

The draft plan 'as a whole'

- 10.10.5 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.

10.11 Climate Change

Reduce contributions to climate change and reduce climate change vulnerability

Promoting and managing growth

- 10.11.1 Both the Ilford and Crossrail Corridor Investment Areas (policies LP1A 'Ilford Investment and Growth Area' and LP1B 'Crossrail Corridor Investment and Growth Area') have been identified as locations with the potential to support a decentralised energy network, which is a very effective way of reducing energy consumption and thus reducing carbon emissions (i.e. reducing contribution to climate change). Conversely, the other three investment areas are not suitable for this type of energy system and have no specific policy regarding reducing contributions to climate change and reducing climate change vulnerability.
- 10.11.2 There is also some (limited) focus on climate change adaptation, with policy LP7 'Back Gardens' seeking to prevent loss partly on the basis that "gardens not only contribute to local character but also [address] the effects of climate change".

²² As set out in the Redbridge Walking Strategy (2012), the Council also aims to promote and facilitate walking as a mode of sustainable active travel and as a form of exercise. The borough is involved in a Cross London Strategic Walking Partnership which is currently completing and promoting six Strategic Walking Routes.

²³ The Council's cycling strategy seeks to develop an attractive, safe and comprehensive cycle network across the borough and linking with the wider area. The local network will soon benefit through connection to the Mayor of London's Cycle Superhighway Route 2 (Aldgate to Ilford). In conjunction with the redevelopment of Ilford Station and areas around it to accommodate Crossrail, the opportunity exists to create an integrated rail, road, bus, pedestrian and cycle hub.

Promoting a green environment

- 10.11.3 Policy LP19 'Climate Change Mitigation' promotes measures to meet carbon dioxide reduction targets²⁴ and zero carbon developments by requiring developments to: reduce emissions through following the steps of the energy hierarchy; incorporate renewable energy and low carbon technologies; demonstrate how London Plan carbon dioxide emission targets are to be met; minimise the need to travel by car and help support decentralised energy networks; work with partners to identify opportunities for carbon reductions; and encouraging the take-up of opportunities to improve the energy efficiency of the existing built environment.
- 10.11.4 With regards to developments, policy LP20 'Low Carbon and Renewable Energy' stipulates that the Council will ensure that: "major developments (including new and retrofit) demonstrate accordance with the energy hierarchy in planning applications by means of submitting detailed energy assessment... continue to participate in regional initiatives to promote district heating/ decentralised energy... proactively identify and promote low carbon and renewable energy opportunities within the borough... promoting low carbon and renewable energy within the borough... [and] the Council will consider the use of pro-active planning powers (such as Local Development Orders) to assist in the implementation of schemes as they come forward". Policy LP24 'Pollution' provides assessment requirements for developments proposing Combined Heat and Power (CHP) or biomass boilers in order for them to demonstrate that they are compliant with the Mayor of London's emissions limits for CHP and biomass.
- 10.11.5 With regards to transport, policy LP22 'Promoting Sustainable Transport' ensures the Council will work with its partners to support the delivery of the Mayor's Transport Strategy and Redbridge's Local Implementation Plan to deliver a more sustainable and efficient transport network in the proposed investment and growth areas (e.g. Crossrail Corridor) that will ultimately lower car dependency and reduce greenhouse gas emissions in the borough – "delivering station and public realm improvements at Ilford, Seven Kings, Goodmayes, Chadwell Heath... actively encouraging walking and cycling²⁵ by providing an attractive public realm, safe, convenient and accessible cycle and footpath networks²⁶" will be a large contribution in achieving this policy. Policy LP23 'Cycle and Car Parking' further supports the provision of cycle parking infrastructure and seeks to provide 20% of car parking spaces accessible to electric charge points for the use of electric and hybrid vehicles in new developments.

Achieving quality design

- 10.11.6 Climate change policies in the Plan that related to achieving quality design include: LP26 'Promoting High Quality Design', LP232 'Sustainable Design & Construction' and LP30 'Household Extensions'. Notably, policy LP32 states that the Council can refuse planning permission for new developments with 'bad quality' designs. The policy encourages developers to use sustainability assessment schemes, such as BREEAM (Building Research Establishment Environmental Assessment Method), to achieve high standards of design, with positive implications for climate change mitigation and adaptation.

²⁴ The total carbon emissions by all sectors within Redbridge are around 964 tonnes, with 53% generated from residential dwellings and 27% from transport. The Redbridge Vision of Sustainable Development seeks to reduce carbon emissions across the borough through a range of measures, such as guiding new development to accessible locations, promoting mixed use development in order to reduce the need to travel and promoting more sustainable forms of transport (public transport, walking, cycling), and retrofitting existing building stock wherever possible to improve energy performance.

²⁵ There are currently 40km of cycle network in the borough, forming part of the London Cycling Network (LCN). As stated in the Council's Cycling Strategy (2010) the Council seeks to make cycling the preferred mode of transport for an increasing proportion of residents and visitors in the borough.

²⁶ The 'Redbridge Walking Strategy (2012)' states that the Council aims to promote and facilitate walking as a mode of sustainable active travel and as a form of exercise.

- 10.11.7 Residential households are the biggest contributors to greenhouse gas emissions in Redbridge and the Council's policies on climate change propose ambitious targets to improve the sustainability of new dwellings with the ultimate goal of them becoming "zero carbon". The Council will also encourage existing residents to improve the sustainability of established homes through measures such as installation of loft insulation, double glazing, more efficient appliances and boilers and small scale renewable energy infrastructure (LP30). This will involve providing information about the reduction in greenhouse gas emissions and utility bills such measures can produce and providing direct economic incentives to householders to undertake such improvements where funding becomes available.

Managing and enhancing the borough's assets

- 10.11.8 Policies linked to climate change are: LP34 'Managing and Protecting the borough's Green Belt and Metropolitan Land', LP37 'Green Infrastructure and Blue Ribbon Network' and LP38 'Protecting Trees and Enhancing the Landscape'. By protecting the natural capital of the borough, the Council can maximise the potential to adapt to climate change, and there will be also be some opportunities relating to landscaping and planting (albeit it is recognised that open / green space is also set to be lost through development supported by the plan).

The draft plan 'as a whole'

- 10.11.9 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.

10.12 Waste

Minimise the production of waste and encourage recycling

Promoting and managing growth

- 10.12.1 Redbridge is one of four constituent Boroughs which form the East London Waste Authority (ELWA). The ELWA has produced a plan that "*sets out a planning strategy to 2021 for sustainable waste management which enables the adequate provision of waste management facilities (including disposal) in appropriate locations for municipal and commercial and industrial waste*²⁷". This is therefore referenced within the Plan and is the mechanism by which sustainable waste management facilities will be provided.
- 10.12.2 The Plan does not directly address measures to minimise the production of waste and encourage recycling, instead reference is made to the ELWA's DPD and the provisions therein to safeguard existing waste management facilities and to provide a framework for managing waste arisings. It is acknowledged that the safeguarding of an adequate range of waste management facilities is key to enabling the handling and management of several waste streams.
- 10.12.3 Whilst reference is made in LP11 'Managing Clustering of Town Centre Uses' to the need to resist development proposals that do not provide adequate on site waste storage and disposal of waste products, there is no stated policy or aim to encourage the minimisation of waste, or the promotion of the reuse or recycling of materials, in line with the waste hierarchy. It is therefore recommended that the Local Plan provides support to proposals which seek to follow the waste hierarchy.

²⁷ East London Waste Authority (ELWA) (2012) Joint Waste Development Plan for the East London Waste Authority Boroughs

Promoting a green environment

- 10.12.4 LP24 'Pollution' sets out to: "Resist development involving the manufacture of hazardous products or the use of hazardous processes, or for development in close proximity to such establishments, unless it can be demonstrated that there will be no risk to public safety."
- 10.12.5 It is suggested that policies relating to promoting a green environment should outline the requirement for new development to provide adequate on-site waste storage and disposal mechanisms, as per LP11. Alternatively, it is recommended that LP11 is cross-referenced within LP24, so as to provide continuation throughout the Local Plan.

Achieving quality design

- 10.12.6 LP26 'Promoting High Quality Design' directly sets out the requirement for new development to provide appropriate facilities for refuse and recycling servicing. Whilst the inclusion of this point is welcomed, it is recommended that this is built upon, and clarification that these facilities are well sighted, with all servicing taking place within the footprint of new development where possible, so as to prevent the use of the public highway as a servicing area or refuse storage area.
- 10.12.7 It is also recommended that reference is made to Redbridge's other policy and guidance documents pertaining to refuse and recycling provision, such as: Section 9 of Redbridge's *Sustainable Design and Construction Supplementary Planning Document*.²⁸

The draft plan 'as a whole'

- 10.12.8 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.

10.13 Economy

Encourage sustained economic growth

Promoting and managing growth

- 10.13.1 Policies that address economic growth include: LP1 'Spatial Development Strategy', LP9 'Ensuring the Future Vitality and Viability of Town Centres', LP10 'Managing Town Centres and Retail Uses', LP12 'Night-Time Economy Uses', LP14 'Stimulating Business and the Local Economy', LP15 'Managed Workspace' and LP16 'Skills and Training'.
- 10.13.2 The overall strategy of the Plan is to propose five Investment and Growth Areas (i.e. Ilford, Crossrail Corridor, Gants Hill, South Woodford and Barkingside (policies LP1A–E). Combined, these five investment areas have the potential to provide an additional 42,000sqm of retail space²⁹, 60,000sqm of employment floorspace and 4,800 new jobs to the borough. New employment space and jobs provision will help boost the local and regional economy.

²⁸ London Borough of Redbridge (2012) Sustainable Design and Construction Supplementary Planning Document.

²⁹ In planning for future growth the Council has undertaken a Retail Capacity Study (2015) which examined the quantitative need for new convenience and comparison floorspace in the borough over the plan period. The study found that there is scope for between 23,911 – 39,851sq.m (net) of comparison retail floorspace and between 8,562 – 17,071 sq.m (net) of convenience retail floorspace.

- 10.13.3 For example, Ilford already benefits from the highest levels of transport accessibility and is set to gain from the introduction of Crossrail which will bring around £70 million of direct public sector investment into the town centre, providing an important catalyst for regeneration. The wards in and to the south of Ilford town centre are among the 20% most deprived in London and are thus in need of economic investment and growth. Crossrail will act as a catalyst for economic growth and inward investment increasing investor confidence which will contribute significantly to delivery of the Council's regeneration plans for the area. Therefore, policy LP1 is crucial in identifying where the most suitable areas of economic investment and growth are expected. The Plan clearly states the potential for job creation in these areas.
- 10.13.4 The Council acknowledges that each town centre in Redbridge has a distinctive role (i.e. predominant land/unit use) and strengths and seeks to promote these attributes to enhance the vitality and viability of each centre. The Plan identifies its town centres through a three tier hierarchy (Metropolitan, District and Local centres). By reinforcing the retail hierarchy, the Council seeks to create distinctive centres with each centre building on its unique characteristics to provide a unique 'offer' to the public. The Redbridge Economic Strategy (2016) sets out a delivery plan to help promote economic growth and regeneration within the borough's town centres and the Council will then monitor the vitality and viability of Ilford Metropolitan Town centre and the five District Centres by undertaking Town Centre Health Checks. It is also recognised that town centres are facing threats to its success (such as through online shopping and mega-scale shopping centres – Stratford), but the Council will promote its town centres appropriately to attract visitors.
- 10.13.5 Additionally, the Council has put in place policy to address unemployment³⁰ by facilitating training opportunities for local residents. For instance, policy LP16 'Skills and Training' states it will "*Deliver construction training in conjunction with the council's recognised providers for all major developments*". This policy can coincide with the proposed development areas in the borough and provide jobs directly to newly trained residents in Redbridge. This will provide once unemployed residents with disposable income that can be spent on the local/regional economy.

Achieving quality design

- 10.13.6 Aspects of the Plan focussed on achieving quality design are not directly relevant to addressing the borough's economic success. There are indirect benefits generated from policies that promote quality designed developments (LP26 'Promoting High Quality Design') which are likely to attract further investment; however, overall, policies addressing design issues are not directly linked in terms of economic growth and as such this should not be a focus of assessment work.

Managing and enhancing the borough's assets

- 10.13.7 Aspects of the Plan focussed on managing and enhancing the borough's assets are not directly relevant to addressing the borough's economic success. It is recommended that the Council identifies the value of its natural assets (e.g. open/green spaces) which attract outside visitors to the borough, further boosting spending in Redbridge, and make specific reference to the importance of these assets to economic growth in Redbridge.

³⁰ Redbridge Equality Impact Assessment 2016 – For example, the working age employment rate for young people (age 16-24) in the borough was 40.3%, compared to 46% for Greater London and 52.4% for Great Britain. Between December 2010 and June 2015 the working age employment rate for young people in Redbridge increased from 35.5% to 40.3% (increase of 4.8%).

The draft plan 'as a whole'

- 10.13.8 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.

10.14 Incomes

Improve incomes and living standards

Promoting and managing growth

- 10.14.1 Redbridge Equality Impact Assessment 2016 identifies that the average gross weekly pay for full time employees in Redbridge (£621.60) is greater than the average weekly pay across London (£617.80) and Great Britain (£520.80). However, there is a substantial gender pay gap in Redbridge with male residents earning 9% more per hour than female residents. However, the growth strategy has limited potential to address this issue. Perhaps more notable is Policy LP14 'Stimulating Business and the Local Economy', which sets out how Redbridge will promote and maintain business and employment within the borough. The Council intends to release 12.4ha of employment land in the borough by prioritising redevelopment opportunities on sites that are under-utilised, poorly performing and/or sites considered to be outdated. This policy should also increase women's job opportunities (and therefore average income) as women tend to work in service industry and retail jobs, which will be positively impacted by the planned growth of retail in the borough.

- 10.14.2 Policy LP15 'Managed Workspaces' will promote economic diversity, supporting existing and new businesses by facilitating the development of workspace for micro, small and medium sized businesses. This will both support the incomes of current employees but provide additional employment (incomes) to the borough. LP16 'Skills and Training' supports this policy and it seeks to make the borough's residents more employable through training and skill development, and thus boosting income levels in Redbridge.

Promoting a green environment

- 10.14.3 Aspects of the Plan focussed on promoting a green environment and other environmental issues are not directly relevant to addressing incomes in the borough. However, indirectly, policy LP22 'Promoting Sustainable Transport' will support incomes by providing Redbridge residents with more public transport options that link directly into town centres from a wide coverage in the borough – preventing residents using high cost private vehicles for commuting.

The draft plan 'as a whole'

- 10.14.4 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.

10.15 Business

Enhance the image of the area as a business location

Promoting and managing growth

10.15.1 The Plan directly addresses enhancing the image of Redbridge as a business location³¹ by promoting and managing growth of the borough in the five Investment and Growth Areas (policies LP1A 'Ilford Investment and Growth Area', LP1B 'Crossrail Corridor Investment and Growth Area', LP1C 'Gants Hill Investment and Growth Area', LP1D 'South Woodford Investment and Growth Area' and LP1E 'Barkingside Investment and Growth Area'). The areas will provide a total of 42,000sqm new retail space and 60,000sqm of new employment space (generating an estimated 4,800 jobs in total). New modern purpose built commercial and office space will be provided in mixed use redevelopment of vacant and underused low grade office accommodation to provide of new flexible office/studio space which will further support local business. The Council recognises the individual role and strengths of each of the borough's town centres (for example Gants Hill is an award winning night-time economy) and seeks to promote these attributes through the Plan to enhance the vitality and viability of each centre.

10.15.2 Furthermore, policies LP9 'Ensuring the Future Vitality and Viability of Town Centres', LP10 'Managing Town Centres and Retail Uses' and LP14 'Stimulating Business and the Local Economy' ensure the Council will retain and enhance a strong hierarchy of town centres throughout Redbridge in order to focus investment and, therefore, increase business prosperity of the borough, including small businesses (which are strongly associated with minority ethnic groups³²). The Council will continue to play an active role in relevant local economic partnerships (i.e. London Enterprise Partnership) and other sub-regional partnerships to create a clear vision and provide a strong voice for north London's economic development and infrastructure needs.

10.15.3 Policy LP11 'Managing Clustering of Town Centre Uses' stipulates certain criteria for particular retail shop types (e.g. hot-food takeaways, betting shops, money lenders) in town centres to ensure that they do not jeopardise the visual attractiveness and overall nature of town centres – optimising the Council's available resources to promote strong partnerships, better public realm, leisure / cultural activities and strong management, and seek investment and suitable delivery partnerships to achieve its objectives.

Achieving quality design

10.15.4 Business shopfronts and advertising devices are important for many businesses to identify their location to potential customers, present information about their goods and services, and differentiate themselves from their competitors. The Council has acknowledged this in their draft Plan and have put in place a policy (LP28 'Advertising and Shop Fronts') to support businesses in creating good quality shopfronts/advertising in town centres, outside of Conservation Areas, that respects the appearance and character of the streetscape.

The draft plan 'as a whole'

10.15.5 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.

³¹ The Employment Land Study (2015) states, a total of 12,085 active enterprises were recorded in Redbridge in 2013, an increase of 845 on the previous year. In addition, between 2004 and 2013, the number of business in Redbridge grew by 49%, and by 7.5% between 2012 and 2013.

³² Redbridge Equality Impact Assessment 2016.

10.16 Transport

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

Promoting and managing growth

- 10.16.1 Policies that address transport include: LP1 'Spatial Development Strategy', LP1A 'Ilford Investment and Growth Area', LP1B 'Crossrail Corridor Investment and Growth Area', LP1C 'Gants Hill Investment and Growth Area', LP1D 'South Woodford Investment and Growth Area', LP1E 'Barkingside Investment and Growth Area', LP4 'Specialist Accommodation', LP9 'Ensuring the Future Vitality and Viability of Town Centres' and LP7 'Managing Town Centres and Retail Uses'.
- 10.16.2 The Council is working in partnership with strategic transport authorities such as TfL and network rail to deliver Crossrail and invest in renewing transport infrastructure and public realm. Policies stated above are intended to help deliver the enhancement of existing transport routes and also to put a planning framework for the provision of new transport routes. Specifics in the Local Plan describe the individual transport modifications for each of the five Investment and Growth Areas – as an example, a Crossrail station is planned for Ilford in 2019, which will create faster and more direct transport routes between east and west London. The borough is already very well connected in terms of transport links, benefitting from various London underground tube lines, and has a major road network linking Redbridge to other boroughs in all directions.
- 10.16.3 The five proposed areas in LP1 are situated in close proximity to existing transport links, with the Ilford and Crossrail Corridor Investment and Growth Areas planned in accordance with the Crossrail route. There are no Investment and Growth Areas proposed that are in isolation from already established transport links or those proposed as part of their respected policy. This is particularly important (as reflected in policy LP4) for the older, vulnerable and homeless demographic in the borough that are more dependent upon public transport links which, without good access, living on their own can lead to isolation and loneliness. As stated in LP22 'Promoting Sustainable Transport', the Council will *"deliver a more sustainable and efficient transport network that supports growth and a prosperous economy, reduces car dependency, encourages sustainable forms of transport"*.
- 10.16.4 Overall, the Council seeks to enhance an already excellent transport network (including rail, road, cycle and public realm) within the borough and to take advantage of the Crossrail link to further improve the borough's connectivity; especially for the older and young people and BME groups³³ whom are more dependent upon public transport. The additional improvements to transport links in Redbridge's town centres are likely to have a significant positive effect on transport efficiency and options within the borough.

Promoting a green environment

- 10.16.5 The proportion of overall carbon emissions from transport in Redbridge is greater than the London average at 27% compared to 19% – a reflection of the higher car ownership-usage and comparatively lower public transport accessibility within some parts of the borough. In order to mitigate the impact of transport on the environment, the Redbridge Vision of Sustainable Development (amongst others) document seeks to promote more sustainable forms of transport (i.e. cycling, walking and public transport). The Council will work with its partners to support the delivery of the Mayor's Transport Strategy and Redbridge's Local Implementation Plan to deliver a more sustainable and efficient transport network that supports growth and a prosperous economy, reduces car dependency, encourages sustainable forms of transport, improves air quality and reduces greenhouse gas emissions.

³³ The Redbridge Equality Impact Assessment 2016 identified that BME groups are less likely to drive cars in Redbridge than the white demographic. The assessment report also shows that the largest proportion of BME groups are situated in the south part of the borough, where the new Crossrail Corridor will be located – further benefitting travel provision.

- 10.16.6 As stipulated in LP22, the Council will require major development to “provide a Transport Impact Assessment to inform the design process, evaluate the impact of the development on the existing transport network and provide mitigation measures to alleviate any adverse effects” and “provide Green Travel Plans to demonstrate how the development will reduce the reliance on private vehicles, the need to travel and promote sustainable forms of transport such as walking and cycling” and “Resist new development that results in an unacceptable adverse impact on traffic congestion within the Local and Strategic Road Network or public transport system unless it incorporates effective mitigation measures”. The draft Plan acknowledges that “a sustainable transport network will facilitate regeneration, growth and investment by enabling residents to access new homes, jobs and other facilities, and enable new and existing businesses to attract new business and also have access to growing markets and locations particularly in central London and the Thames Gateway”.
- 10.16.7 The Council’s current Local Implementation Plan (LIP) sets out the borough’s 20 year transport delivery proposals set in the context of delivering the Mayor’s Transport Strategy (2010) and will seek to implement further transport improvements through Major schemes, including at Manford Way (Hainault) Town Centre Regeneration, Redbridge District Centre Regeneration, Woodford Bridge Town Centre Regeneration and Ilford Eastern Gateway. Private vehicle use within the borough is still widely used and consequently has put severe pressure on the local transport system. As such, the Council is seeking to promote a ‘Model Shift’ in which it encourages the borough’s residents to move away from private vehicle use to more sustainable means (i.e. walking, cycling, public transport), utilising already established infrastructure – for the 40km of cycle network in the borough, forming part of the London Cycling Network (LCN). As stipulated in LP22, the Council will seek to provide safe, convenient and accessible cycle and foot path networks through Investment and Growth Areas and that connect to the sub-regional network. However, it is worth noting that active promotion of cycling and walking in circumstances and places where young and elderly people feel unsafe could have a negative effect.
- 10.16.8 Overall, the policies identified in this section focus on strict assessment of both current and future transport infrastructure use. The Council’s focus is on lowering private vehicle use (and therefore congestion) in the borough by utilising current sustainable transport routes and providing additional/improved transport links for residents. It is evident that the Council is attempting to change the ethos/mind-set of the residents with regards to using sustainable modes of transport more often. Additionally, the policies set out strict requirements for new developments to fully examine their impact on transport links in the borough.
- [The draft plan ‘as a whole’](#)
- 10.16.9 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).

11 CONCLUSIONS AT THIS CURRENT STAGE

- 11.1.1 The appraisal of the draft (Proposed Submission) plan, as presented above, does not highlight the likelihood of significant negative effects in terms of any objective, and suggests the likelihood of significant positive effects predicted in terms of 'the economy' - a matter at the heart of the plan, as reflected in the clear focus on five Investment and Growth Areas. A focus on supporting growth within certain areas and corridors could also lead to significant positive effects in terms of transport and community objectives; however, there is more uncertainty. With regards to 'housing', the plan performs well in that the aim is to meet the London Plan target, and also deliver a housing mix that responds to needs; however, the evidence provided by the Strategic Housing Market Assessment (SHMA) suggests that some housing needs will remain unmet.
- 11.1.2 Relatively few strategic tensions / trade-offs are highlighted through the draft plan appraisal, recognising that the preferred approach is something of a balancing act, arrived at subsequent to appraisal of more extreme options (e.g. higher growth options that would perform well in terms of socio economic objectives, but perform poorly in terms of environmental objectives; and vice versa lower growth options - see discussion of alternatives in Part 1 of this report). There will, of course, be localised negative effects of growth to contend with - e.g. in respect of landscape and heritage - but a stringent set of development management policies is set to be put in place to ensure that effects are mitigated as far as possible. A small number of recommendations are included within the above appraisal, which can be discussed during the plan's examination (see discussion of 'next steps', below).

PART 3: WHAT HAPPENS NEXT?

12 INTRODUCTION (TO PART 3)

12.1.1 The aim of this chapter is to explain next steps in the plan-making / SA process.

13 PLAN FINALISATION

13.1.1 Subsequent to publication stage, the main issues raised will be identified and summarised by the Council, who will then consider whether the plan can still be deemed to be 'sound'. Assuming that this is the case, the plan (and the summary of representations received) will be submitted for Examination.

13.1.2 At Examination a Government appointed Planning Inspector will consider representations (in addition to the SA Report and other submitted evidence) before determining whether the plan is sound (or requires further modifications).

13.1.3 If found to be 'sound' the plan will be formally adopted by the Council. At the time of Adoption an 'SA Statement' must be published that sets out (amongst other things) *the measures decided concerning monitoring*.

14 MONITORING

14.1.1 At the current time, there is a need only to present 'measures envisaged concerning monitoring'.

14.1.2 As stated within the plan document:

"The Council will monitor the effectiveness of the Local Plan in delivering its objectives by regularly assessing its performance against a series of indicators. We will publish authority monitoring reports annually, which will:

- Assess the performance of the Local Plan policies;
- Assess the performance of development management in relation to planning applications;
- Set out the Council's updated housing trajectory;
- Identify the need to reassess or review any policies or approaches;
- Ensure key evidence and assumptions behind the strategy and policies are still relevant; and
- Identify any trends in the wider social, economic, and environmental issues facing Redbridge.

Regular monitoring will be a key tool in providing flexibility. This will measure progress in delivering the Local Plan, and identify any aspects that are not being achieved as planned and any changing circumstances that may affect implementation.

The monitoring framework set out in Appendix 3 will be used to monitor the delivery of each local plan policy. The indicators have been specifically selected to address every policy as far as possible. All indicators and targets will be subject to periodic review through the annual monitoring process."

14.1.3 Appendix III of the plan then presents a long list of monitoring indicators. From an SA perspective, in light of the draft plan appraisal presented in Part 2 of this report, it is good to see that there is a focus on monitoring not just via analysis of planning applications, but also monitoring of the environmental and socio-economic baseline itself. For example, there is a commitment to monitor: "Change in areas and populations of biodiversity importance, including... Change in priority habitats and species (by type)". One additional issue that could benefit from monitoring, given the likely effects of the plan (or at least given the uncertainties) is the matter of playing pitch and sports facility provision, taking into account quality as well as quantity.

APPENDIX I - REGULATORY REQUIREMENTS

As discussed in Chapter 2 above, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report; however, interpretation of Schedule 2 is not straightforward. Table A links the structure of this report to an interpretation of Schedule 2 requirements, whilst Table B explains this interpretation.

Table A: Questions answered by this SA Report, in-line with an interpretation of regulatory requirements

		Questions answered	As per regulations... the SA Report must include...
Introduction		What's the plan seeking to achieve?	<ul style="list-style-type: none"> • An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
		What's the sustainability 'context'?	<ul style="list-style-type: none"> • Relevant environmental protection objectives, established at international or national level • Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
	What's the SA scope?	What's the sustainability 'baseline'?	<ul style="list-style-type: none"> • Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan • The environmental characteristics of areas likely to be significantly affected • Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> • Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
Part 1	What has plan-making / SA involved up to this point?	<ul style="list-style-type: none"> • Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) • The likely significant effects associated with alternatives • Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan 	
Part 2	What are the SA findings at this current stage?	<ul style="list-style-type: none"> • The likely significant effects associated with the draft plan • The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan 	
Part 3	What happens next?	<ul style="list-style-type: none"> • A description of the monitoring measures envisaged 	

Table B: Questions answered by this SA Report, in-line with regulatory requirements

<u>Schedule 2</u>	<u>Interpretation of Schedule 2</u>	
<i>The report must include...</i>	<i>The report must include...</i>	
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance The relevant environmental protection objectives, established at international or national level	i.e. answer - <i>What's the 'context'?</i>
(c) the environmental characteristics of areas likely to be significantly affected;		
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;		
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan' The environmental characteristics of areas likely to be significantly affected	i.e. answer - <i>What's the 'baseline'?</i>
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Key environmental problems / issues and objectives that should be a focus of appraisal	i.e. answer - <i>What are the key issues & objectives?</i>
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach)	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]
	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	
(i) a description of the measures envisaged concerning monitoring.	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]

Whilst Tables A and B signpost broadly how/where this report meets regulatory requirements. As a supplement, it is also helpful to present a discussion of more precisely how/where regulatory requirements are met - see Table C.

Table C: ‘Checklist’ of how (throughout the SA process) and where (within this report) regulatory requirements have been, are and will be met.

Regulatory requirement	Discussion of how requirement is met
Schedule 2 of the regulations lists the information to be provided within the SA Report	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Chapter 3 (‘What’s the plan seeking to achieve’) presents this information.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report. The outcome of scoping was an ‘SA framework’, and this is presented within Chapter 4 (‘What’s the scope of the SA’).
c) The environmental characteristics of areas likely to be significantly affected;	Also, more detailed messages regarding the SA scope - i.e. messages established through context and baseline review - are presented within Appendix II.
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.;	
e) The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	Appendix II presents information learned through ‘context review’. With regards to explaining “ <i>how... considerations have been taken into account</i> ” - <ul style="list-style-type: none"> • Chapters 6 explains how reasonable alternatives were established in 2016 in-light of earlier consultation/SA.. • Chapter 8 explains the Council’s ‘reasons for supporting the preferred approach’, i.e. explains how/why the preferred approach is justified in-light of alternatives appraisal (and other factors).
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	Chapter 7 presents alternatives appraisal findings (in relation to the spatial strategy, which is the ‘stand-out’ plan issue and hence that which should be the focus of alternatives appraisal/consultation). Chapter 10 presents the Draft Plan appraisal. As explained within the various methodology sections, as part of appraisal work, consideration has been given to the SA scope, and the need to consider the potential for various effect characteristics/dimensions.

Regulatory requirement	Discussion of how requirement is met
<p>g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;</p>	<p>As a result of the 2013 appraisal of the Draft Plan, and the 2014 appraisal of spatial strategy alternatives, the Council identified a number of issues that should be the focus of subsequent plan-making.</p> <p>At the current time, a number of specific recommendations are made and, more generally, the appraisal identifies how the plan might potentially 'go further' in certain respects.</p>
<p>h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;</p>	<p>Chapters 5 and 6 deal with 'Reasons for selecting the alternatives dealt with', in that there is an explanation of the reasons for focusing on particular issues and options.</p> <p>Also, Chapter 8 explains the Council's 'reasons for selecting the preferred option' (in-light of alternatives appraisal).</p> <p>Methodology is discussed at various places, ahead of presenting appraisal findings, and limitations are also discussed as part of appraisal narratives.</p>
<p>i) description of measures envisaged concerning monitoring in accordance with Art. 10;</p>	<p>Chapter 13 presents measures envisaged concerning monitoring.</p>
<p>j) a non-technical summary of the information provided under the above headings</p>	<p>The NTS is a separate document.</p>
<p>The SA Report must be published alongside the draft plan, in-line with the following regulations</p>	
<p>authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)</p>	<p>At the current time, the SA Report is published alongside the Proposed Submission Plan, under Regulation 19, so that representations might be made ahead of submission.</p>
<p>The SA Report must be taken into account, alongside consultation responses, when finalising the plan.</p>	
<p>The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.</p>	<p>Appraisal findings presented within this current SA Report will inform a decision on whether or not to submit the plan, and then (on the assumption that the plan is submitted) will be taken into account when finalising the plan at Examination (i.e. taken into account by the Inspector, when considering the plan's soundness, and the need for any modifications).</p>

APPENDIX II - CONTEXT AND BASELINE REVIEW

Introduction

As discussed in Chapter 4 ('What's the scope of the SA?') the SA scope is primarily reflected in a list of objectives ('the SA framework'), which was established subsequent to a review of the sustainability 'context' / 'baseline', analysis of key issues, and consultation. The aim of this appendix is to present summary key issues that emerging from the context / baseline review.

Poverty and social exclusion

Redbridge has the fourth most diverse community in England and is the 134th most deprived Local Authority out of 326. Redbridge has 11 neighbourhoods amongst the 20% most deprived in England and another 11 amongst the 20% least deprived in England;

Crime and the fear of crime

In recent years Redbridge has seen successive increases in the rate of residential burglary in the borough between 2007/08 and 2011/12. However the combined work of the Police, Council and other partnership agencies resulted in a significant decrease in residential burglary for the 2012/13 financial year.

Decent, affordable homes

According to the 2011 Census, the population of Redbridge was 279,000, an increase of 37,000 (15%) since 2001. The borough's population is estimated to grow significantly over the 15 year plan period, with an increase of 65,000 to reach 362,000 by 2030. It is anticipated that much of the population growth in Redbridge will be in the south of the borough, particularly in Ilford.

During the period of the 2001 and 2011 census, the average occupancy of all Redbridge households rose from 2.56 to 2.82 people, which follows a century-long trend of falling household sizes. The 2010 Strategic Housing Market Assessment (SHMA) reported that 12,355 households (12% of the borough's households) were living in unsuitable housing, of which 5,848 households were found to be overcrowded.

There is currently one Gypsy and Traveller site in the borough, located at Forest Road in Fairlop. This is a Council managed site that currently provides 16 pitches. The Forest Road site has the capacity to provide the number of additional pitches to meet the required need.

Education and skills

Over one fifth (23%) of Redbridge households consist of a couple with dependent children, 26% of households are people living alone and 16% of households are aged 65+. Redbridge has experienced in migration of young families and out migration of older people.

Redbridge has a lower percentage of persons older than 16 with no formal qualifications (18.5%) compared to the national figure of 22.5%. However, it is important that the influx of new households will have educational facilities to also achieve these necessary qualifications.

Community services and leisure opportunities

The most recent Redbridge Community Infrastructure Plan estimates that in the period 2015-2030 the borough will require facilities to house an additional 6,570 childcare places, three Primary Schools and at least five new High Schools in addition to planned expansions at the Beal, Mayfield, Woodbridge and Oaks Park High Schools. The NHS is also seeking sites for new Polyclinics, and it is well established that the supply of land that is both suitable and available is extremely limited in the borough.

The borough has an enviable leisure offer. There are a range of sports and leisure facilities in the borough including Sports and Fitness Centres at Wanstead, Redbridge, Fullwell Cross, Cricklefields Athletic Ground, Fairlop Outdoor Activity Centre and Redbridge Cycling Centre. Ilford is home to the Kenneth More Theatre and there are two cinemas in the borough at Ilford and South Woodford. Valentine Mansion and gardens offers local history and heritage. However, there is under provision of leisure centres and swimming pools.

The quantity and quality of open space varies across the borough. Some areas such as in the north and east of the borough have access to a number of high quality open spaces whilst in other areas particular in the south access to open space is often limited and of lower quality. Areas of housing growth such as the Ilford and Cross Rail Corridor Investment and Growth Areas are located in areas of deficiency.

The Redbridge Playing Pitch Strategy (2016) (PPS) has explored whether there is sufficient playing pitch provision in borough to meet both the current and future population growth. The PPS has found that there is sufficient capacity within the borough's existing playing pitch provision through intensifying use, improving existing facilities, reconfiguring pitches or investment in bringing unused pitches back into use to meet the future demand created by population growth and future participation trends. Also, an Alternative Playing Pitch Assessment (2016) has explored whether there are feasible and deliverable sites in the borough which could accommodate the reprovision of the existing level of sports pitches (and facilities) which are currently on the Oakfield Playing Fields and the Ford Sports Ground, should these sites be developed. The assessment demonstrates that there are a range of alternative, suitable and deliverable sites in the borough.

Healthy lifestyles

95.1% of Redbridge's current population is estimated to be of very good (48.1%), good (35.0%) or fair (12.0%) health, which is 0.1% higher than Greater London and 0.6% above the national average. However, there are pockets of population in Redbridge that have bad health (7.1%) and very bad health (2.6%) which are well above the national averages.

Health inequalities are most pronounced between the borough's more prosperous north west and its southern wards, where there is the high proportion of residents from minority ethnic groups. Hainault in the north east also suffers from poor health outcomes. Specific points are -

One fifth of children aged 4-5 years and over a third of children aged 10-11 years are overweight or obese. The level of physical activity among children and adults is lower than average. Over a third of children in the Black ethnic group in Redbridge are eligible for free school meals, more than in any other ethnic group representing an indication of future health problems.

Landscapes and townscapes

Redbridge has many attractive and historic neighbourhoods, with notable examples being Wanstead, Snaresbrook, Aldersbrook, Woodford Green and Woodford Bridge. According to the Characterisation Study (2014), suburban typology is dominant, accounting for approximately 42% of the built up area. Woodford, Wanstead, Barkingside and Chadwell Heath can generally be described as suburban, with streets typically consisting of low to medium densities and reasonable levels of architectural coherence. The Characterisation Study discusses other typologies existing within the borough, including Suburban Terraces, which is most evident within areas of public sector housing. Hainault can generally be described as consisting of Suburban Terrace typologies. Urban Terrace is also a relatively common typology within the older centres of Redbridge, in the south of the borough. The streets are characterised by Victorian and Edwardian townhouses, representing the earliest phase of suburban growth around centres with good rail access like Ilford, Seven Kings and Goodmayes. Other typologies such as 'Grand suburbs' and 'Grand villas', which predominate in the more affluent parts of the borough of Woodford Broadway and Woodford Green are less common but add to the character of the borough. Ilford and Gants Hill have a character which is more intense and is higher in density, and includes taller buildings.

There are 16 conservation areas, over 200 statutorily listed buildings, 200 locally listed buildings and a range of undesignated heritage assets, identified through the Redbridge Characterisation Study (2014). Much of the important and most intact examples of heritage in Redbridge lie to the west of the borough at Wanstead, Snaresbrook, South Woodford, Woodford Green, Woodford Wells, Woodford Broadway and Monkams, and Woodford Bridge. The heritage assets in this western corridor consist of 11 conservation areas, large historic parks (Wanstead Park and Wanstead Flats), and many of the listed buildings in the borough, some of which are located within the natural setting of Epping Forest on the borough's western boundary. The bulk of these buildings are located within the conservation areas, which also consist of historic open spaces and lakes and ponds. The majority of what is important in terms of this heritage generally dates between the 18th and 20th centuries (inter war 20th century), and reflects the establishment of suburban development occurring throughout the country during this period.

There are several areas of distinct open space character within Redbridge. For example, the north and east of the borough is associated with Epping Forest, Hainault Forest and rural Essex; whilst the River Roding bisects the borough as an important ecological corridor and linear green space, forming part of the East London Green Grid and associated with varied land uses including recreational uses and infrastructure. In addition to its expansive areas of open space there are numerous smaller open spaces within the urban area. These range from formal parks such as Valentines Park, which are well used by the public, to spaces that are not accessible to the public and are of poor quality.

Biodiversity, species and habitats

About one third of the borough is comprised of Green Belt, and around 48% of the borough is covered in green space. Epping Forest and the valley of the River Roding provide important green corridors running from north to south. Epping Forest is a Special Area of Conservation (SAC) of European importance.

In addition to Epping Forest SAC there are nationally important Sites of Special Scientific Interest (SSSIs) covering parts of Epping Forest, Wanstead Flats and Hainault Forest; and Sites of Metropolitan Nature Conservation Importance (SNCIs) including River Roding and Seven Kings Water. These provide corridors for wildlife movement, play a role in drainage and flood management and are valuable for recreation. The London Plan places an emphasis on the Blue Ribbon Network, and the London Rivers Action Plan (LRAP) promotes river restoration across London through the enhancement of riverside parks and green spaces.

Road traffic

Population growth coupled with the increased demand for travel has put severe pressure on the local transport system. Traffic congestion has increased and contributes greatly to the borough's carbon emissions, resulting in adverse impacts on air quality and quality of life for residents. Similarly, overcrowding on some public transport services is a significant issue, particularly those running into Central London. The arrival of Crossrail represents a considerable opportunity to support 'modal shift'.

The entirety of the London Borough of Redbridge has been declared as an AQMA due to exceedances in levels of NO₂ and particulate matter pollution.

Climate change

The Council has undertaken a heat mapping exercise that identifies five district heating opportunity areas (Fullwell Cross/Barkingside, King George/Goodmayes Hospitals, Gants Hill, Ilford Town Centre/Crossrail Corridor, and Loxford). Further master planning work has considered the financial and technical feasibility of a number of these opportunity areas and concluded that at the present time, the King George/Goodmayes Hospitals, and Ilford Town Centre/Crossrail Corridor opportunities areas are potentially both financially and technically feasible for implementation of a district heating network.

With regards to climate change adaptation - flood risk is the key consideration. Flood modelling undertaken by the Environment Agency and the Council has resulted in mapping that divides the borough into a number of zones ranging from areas at the lowest risk of flooding (Zone 1) to those with the greatest risk (Zone 3).

Waste and recycling

Redbridge has prepared a Joint Waste Development Plan Document with the London Boroughs of Newham, Havering and Barking and Dagenham (i.e. the East London Waste Authority- ELWA Boroughs). The purpose of the DPD is to establish planning policies to manage the waste arising in these boroughs in accordance with national and London Plan targets for recycling, composting and landfill. The DPD sets a planning framework for the management of municipal and commercial waste throughout the ELWA boroughs from 2011 to 2021, safeguarding sixteen existing waste management facilities across the ELWA area. Three of the safeguarded sites are in Redbridge.

Economic growth

In comparison to the rest of London, Redbridge has a small supply of employment land. The borough has approximately 59.78 ha of employment land of which 42.4 is designated and 17.38 is non-designated land (over 0.25ha). Redbridge is regularly near the top of the rankings for business growth; however, in common with the rest of London, the borough's industrial base has declined over recent decades with a shift away from traditional manufacturing industries into the service sector.

The Council undertook an Employment Land Review (2015), concluding that the Council should manage the loss of up to approximately 12.14 ha of employment land in the borough over the plan period. Although manufacturing is in decline, demand for space for small and medium businesses is increasing given the high number of business startups in the borough. Also, an over-supply of outdated and underutilised accommodation is suppressing the town centre office market and hinders the attraction of investment for modern, accessible, well serviced business accommodation in relation to the areas of highest predicted growth in business demand.

Incomes and living standards

Employment is the biggest factor affecting income inequality; hence there is a need to get more people into work and help them to develop their careers in the long-term. This can be supported through a range of measures, including helping people into work or training and using links with businesses. The borough has a higher unemployment percentage (8.9%) than the national average (7.8%) and a lower economically active population (74.3%) than the national average (77.3%).

Image of the area as a business location

The arrival of Crossrail in 2019 will enable significant development and regeneration within Ilford and the Crossrail Corridor, resulting in major transformation. This significantly improved connectivity and accessibility to Central London will provide an attractive proposition to investors, creating value and acting as a catalyst for further intensification of Ilford and the surrounding areas. Ilford Town Centre is already designated a Metropolitan Town Centre in the London Plan (2015) and recently attained Housing Zone status.

High quality transport network

Redbridge lies on the main East Anglia to London Liverpool Street train line on a section of track that is to benefit from Crossrail investment. Redbridge includes sections of the London Underground Central Line (zone 4) including much of the Hainault loop. The borough is well served by Transport for London buses, most of which run through Ilford. The A12 runs east-west through the central area of the borough, linking Central London and East Anglia; the North Circular Road (A406) runs inside the south-western quadrant of the borough and meets the M11 east of South Woodford.

Ilford is just 16 minutes from the City by rail and Crossrail will provide even faster direct links to the City, West End and Heathrow. Other centres to be served by Crossrail include Seven Kings, Goodmayes and Chadwell Heath. The District Centres of Gants Hill, Wanstead, South Woodford and Barkingside are well served by the London Underground Central Line.

In-line with the Redbridge Walking Strategy (2012), the Council aims to promote and facilitate walking as a mode of sustainable active travel and as a form of exercise. There is a focus on the key A118 and A123 Corridors and Ilford, Wanstead, Gants Hill and Chadwell Heath Neighbourhoods where potential for high return on walking programmes is greatest. A large proportion of the urban area falls within easy walking distance of one of the borough's fourteen rail stations. To encourage greater walking the Council also seeks to implement a range of Station Urban Integration Schemes (UIS), which include improvements to the streetscape and public realm around the stations.

There are currently 40km of cycle network in the borough, forming part of the London Cycling Network (LCN). However, cycling as a proportion of mode share is relatively low. The local network will soon benefit through connection to the Mayor of London's Cycleway route 6 (Mile End to Hainault). In conjunction with the redevelopment of Ilford Station and areas around it to accommodate Crossrail, the opportunity exists to create an integrated rail, road, bus, pedestrian and cycle hub.

APPENDIX III - SPATIAL STRATEGY ALTERNATIVES APPRAISAL

Introduction

As explained within ‘Part 1’ above, a focus of work has been on the development and appraisal of spatial strategy alternatives, with a view to informing determination of the preferred strategy.

The alternatives (in summary) are as follows -

Option	Quantum	Distribution <i>As per the preferred option, but with...</i>
1	Minimum growth (16,750 homes)	No Oakfield or Billet Rd
2	Lower growth 1 (17,350 homes)	No Billet Rd
3	Lower growth 2 (17,850 homes)	No Oakfield
4	Preferred Option (18,450 homes)	-
5	Variation on PO 1 (18,450 homes)	No Oakfield; Higher density at Goodmayes
6	Variation on PO 2 (18,450 homes)	No Oakfield; Higher density in Western Corridor
7	Variation on PO 3 (18,450 homes)	No Oakfield; Higher density at Goodmayes and Billet Rd
8	Variation on PO 4 (18,450 homes)	No Oakfield; Extra GB
9	Higher growth 1 (19,050 homes)	Higher density at Goodmayes
10	Higher growth 2 (19,050 homes)	Higher density in Western Corridor
11	Higher growth 3 (19,050 homes)	Extra GB
12	High growth (19,650 homes)	Extra GB

Appraisal methodology

For each of the options, the assessment examines ‘likely significant effects’ on the baseline, drawing on the sustainability objectives identified through scoping (see Table 4.1) as a methodological framework.

Green is used to indicate significant positive effects, whilst **red** is used to indicate significant negative effects. Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policy approaches under consideration. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a ‘no plan’ scenario). In light of this, there is a need to make considerable assumptions regarding how scenarios will be implemented ‘on the ground’ and what the effect on particular receptors will be.³⁴ Where there is a need to rely on assumptions in order to reach a conclusion on a ‘significant effect’ this is made explicit in the appraisal text.

Where it is not possible to predict likely significant effects on the basis of reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a **rank of preference**. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of ‘significant effects’.

Finally, it is important to note that effects are predicted taking into account the criteria presented within Regulations.³⁵ So, for example, account is taken of the duration, frequency and reversibility of effects. Cumulative effects are also considered (i.e. where the effects of the plan in combination with the effects of other planned or on-going activity that is outside the control of the Redbridge Local Plan).

³⁴ Considerable assumptions are made regarding infrastructure delivery, i.e. assumptions are made regarding the infrastructure (of all types) that will come forward in the future alongside (and to some extent funded through) development.

³⁵ Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004.

Alternatives appraisal findings

Appraisal findings are presented below within 15 separate tables, each table dealing with a specific sustainability objective.

The appraisal methodology is explained above, but to reiterate: For each sustainability topic the performance of each scenario is categorised in terms of ‘significant effects (using red / green) and also ranked in order of preference. Also, ‘ = ’ is used to denote instances of all alternatives performing on a par.

Reduce poverty and social exclusion												
	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7	Option 8	Option 9	Option 10	Option 11	Option 12
Rank	=	=	=	=	=	=	=	=	=	=	=	=
Significant effects?	No											
Discussion	<p>It does not seem likely that a lower growth strategy involving nil growth at Oakfield or Billet Rd would have a negative bearing on achievement of this objective, and equally it is not likely that a higher growth strategy (e.g. a higher growth strategy involving additional Green Belt release) would have a negative bearing. Certain options are better suited to the delivery of community infrastructure (see discussion under headings below), but it is not clear that there will be implications for poverty and social exclusion. King George & Goodmayes Hospitals & the Ford Sports Ground is notable for being well linked to the Crossrail corridor, but it is not clear that this will translate into ‘poverty and social exclusion’ benefits. As such, the alternatives perform on a par, and significant effects are not predicted</p> <p>All options would involve targeting investment on specific areas and corridors within the borough, including in the south of the borough where major benefits are set to be realised (most notably at Ilford). As such, any option would lead to positive effects; however, significant effects are unlikely.</p>											

Reduce and prevent crime and the fear of crime												
	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7	Option 8	Option 9	Option 10	Option 11	Option 12
Rank	=	=	=	=	=	=	=	=	=	=	=	=
Significant effects?	No											
Discussion	<p>The alternatives perform on a par. Whilst certain options are better suited to the delivery of a high quality and legible urban realm (see discussion below, under ‘townscape’), it is not clear that there will be implications for crime. A key matter is the need to improve Ilford Town Centre; however, this is not a variable across the alternatives. The alternatives perform on a par, and significant effects are not predicted.</p>											

Meet local housing needs by ensuring that everyone has the opportunity to live in a decent, affordable home												
	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7	Option 8	Option 9	Option 10	Option 11	Option 12
Rank	12	11	10	5	8	8	7	5	3	3	2	★1
Significant effects?	Yes			No								
Discussion	<p>In general, there is a need to deliver higher growth in order to more fully meet objectively assessed housing needs; also, there is a need to deliver an appropriate housing mix, in terms of type (family housing is needed) and tenure (affordable housing is needed).</p> <p>Options involving higher growth at ‘King George & Goodmayes Hospitals & the Ford Sports Ground’ or in the Western Corridor (Options 5, 6, 8 and 9) perform relatively poorly, given implications for the desired housing mix (the area being suited to development as a Garden Suburb, similar to Oakfield). Green Belt developments will generally be well placed to deliver a high proportion of affordable housing. Also, Green Belt development potentially has greatest potential to accommodate Gypsies and Traveller pitches; however, this is uncertain.</p> <p>However, an overriding consideration is the need to deliver enough homes such that objectively assessed housing needs are met. On this basis, it seems appropriate to conclude that only Option 12 performs best. The relative performance of the other options is a factor of the quantum of housing first and foremost, with matters of housing mix a secondary consideration. Options 1, 2 and 3 perform worst, and would lead to significant negative effects, as the plan would not exceed the London Plan target and thus not help to ‘close the gap’ between land supply and objectively assessed needs. No option would result in significant positive effects, as unmet needs would result under all options (according to the evidence of objectively assessed housing needs provided by the SHMA).</p>											

Improve the education and skill of the population overall												
	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7	Option 8	Option 9	Option 10	Option 11	Option 12
Rank	6	★1	6	★1	6	6	6	6	★1	★1	★1	★1
Significant effects?	No											
Discussion	<p>Oakfield is a growth location that performs well given potential to deliver a new school. Options involving higher density at ‘King George & Goodmayes Hospitals & the Ford Sports Ground’ perform poorly given the school capacity issues that exist in the south of the borough; and Option 3 (additional development within the borough’s western corridor, in place of Oakfield) also performs poorly, as there would be no potential to deliver a new school on any development site.</p> <p>In conclusion, options involving development at Oakfield perform best. Significant effects are not predicted, however, as numerous other factors other than the spatial growth strategy (both relating to the Local Plan and unrelated to the Local Plan) will have a bearing on the achievement of education/skills objectives.</p>											

Provide accessible community services and leisure opportunities												
	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7	Option 8	Option 9	Option 10	Option 11	Option 12
Rank	★1	★1	★1	★1	11	11	10	★1	★1	★1	★1	★1
Significant effects?	No											
Discussion	<p>Oakfield is a growth location that performs well given its location (good access to Barkingside, public transport, leisure facilities and open space at Fairlop Country Park and Hainault Forest Country Park) and given potential to deliver a new school and health facility (needed in this area, according to Redbridge Children’s Services and Redbridge NHS) and generally support the Council’s ambitions to develop Barkingside as a centre. Also, the existing leisure centre is an important local facility and redevelopment offers the potential to improve and enhance it to create a sub regionally important facility. However, there remain some uncertainties in respect of re-providing for lost sports pitches such that there is no net loss in the quality of provision locally. The Council would work with the Old Parkonians Football and Cricket Clubs to find alternative pitches; however, concerns remain.</p> <p>It is also fair to conclude that Green Belt development would be able to provide the necessary facilities to cater for local demand, and that residents would have good access to open space / recreational opportunities. However, new facilities would not contribute to needs arising from the south of the borough.</p> <p>Options involving higher growth at ‘King George & Goodmayes Hospitals & the Ford Sports Ground’ or in the Western Corridor (Options 5, 6, 8 and 9) perform relatively poorly, given issues around delivering community infrastructure.</p> <ul style="list-style-type: none"> Proposals for the ‘King George & Goodmayes Hospitals & the Ford Sports Ground’ site include the provision of new primary and secondary schools as well as a Polyclinic; however, whether or not the site could accommodate an additional school originally intended for Oakfield is uncertain given the size of the site and existing and previously proposed uses. It would also result in a significant concentration of schools in one area, rather than being distributed throughout the borough. The western corridor shares many of the attributes of the identified Investment Areas, particularly in respect of transport connections; however, available sites are generally too small to accommodate community facilities with large land requirements such as schools. Similarly, there is limited potential to enhance open space provision, which is a pertinent issue given areas identified as being deficient in public open space (children’s playgrounds). <p>In conclusion, it is difficult to differentiate the alternatives with certainty, but what is clear is that options that would involve both nil growth at Oakfield plus either higher growth at ‘King George & Goodmayes Hospitals & the Ford Sports Ground’ or higher growth in the Western Corridor, perform relatively poorly. With regard to effect significance, there is an argument to suggest that some or all options would lead to significant positive effects; however, there are notable uncertainties.</p>											

Promote healthy lifestyles												
	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7	Option 8	Option 9	Option 10	Option 11	Option 12
Rank	★1	★1	★1	★1	11	11	10	★1	★1	★1	★1	★1
Significant effects?	No											
Discussion	Issues discussed above, under 'Provide accessible community services and leisure opportunities' are also relevant here, given determinants of health.											

Maintain, enhance and where appropriate conserve the quality of landscapes and townscapes												
	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7	Option 8	Option 9	Option 10	Option 11	Option 12
Rank	★1	★1	3	3	5	5	5	5	5	5	5	12
Significant effects?	No											Yes
Discussion	<p>There are clear sensitivities locally, and so lower growth performs well. Other key sensitivities are associated with -</p> <ul style="list-style-type: none"> The Western Corridor - is highly sensitive from a heritage perspective. As stated within the Planning Inspector's report into the Further Alterations (November 2014): <i>"[I]t cannot be assumed, in my view, that it will be appropriate to increase densities over the existing Density Matrix guidelines in all cases. Town centres are accessible locations but each has its own character which new development should respect"</i>. There is a desire to avoid new blocks of flats within the corridor. 'King George & Goodmayes Hospitals & the Ford Sports Ground' - where higher growth would compromise design / urban realm objectives and also heritage conservation objectives given the locally listed Goodmayes Hospital buildings. The proposed 800 homes scheme (with two new schools) was established through an design-led process of determining the potential indicative yield for the site, having regard to the protection of the heritage assets on the site and the delivery of a garden suburb character. Billet Road - assumed to be somewhat sensitive from a landscape perspective, given that past Green Belt Reviews have found the area to contribute to Green Belt purposes. Green Belt development elsewhere - would clearly impact significantly on the Fairlop Plain's characteristic openness. However, it is noted that a low density development of 425 dwellings has been approved at Five Oaks Lane on the grounds that such a scheme could enhance the functioning of the Green Belt by removing existing unlawful uses and consolidating built footprint. <p>With regard to Oakfield, whilst there would be a loss of Green Belt there is the potential to realign the Green Belt such that there are clear 'defensible boundaries', including the central line railway embankment. The Green Belt Review also discussed the fact that Oakfield's relationship to surrounding development means that the site does not serve purpose of containing the spread of the built-up area into open countryside. Furthermore, significant areas of open space would be retained with the aspiration being for the site to be developed in line with 'garden suburb' principles.</p> <p>In conclusion, a primary consideration is growth quantum, and a secondary factor is distribution (between Oakfield, as a relatively non-sensitive location, and other locations).</p>											

Option 4 **performs well**, relative to other options that would involve the same growth quantum, as growth at Oakfield would negate the need for higher growth at more sensitive locations. With regards to effect significance, it certainly seems fair to conclude that Option 12 would result in significant negative effects, as there would be impacts to Fairlop Plain, which is one of the borough’s key landscape assets.

Maintain and enhance biodiversity, species and habitats												
	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7	Option 8	Option 9	Option 10	Option 11	Option 12
Rank	★1	★1	★1	★1	10	★1	9	★1	10	★1	★1	10
Significant effects?	No											
Discussion	<p>Higher density development at ‘King George & Goodmayes Hospitals & the Ford Sports Ground’ could place pressure on Seven Kings Water, which is an important ecological corridor (given potential for deculverting and restoration). Also, whilst much of the Fairlop Plain area comprises arable farmland likely to be of limited biodiversity value, it is noted that a significant area is farmed under an agri-environment agreement, plus there is a need to consider the possibility of growth in proximity to Hainault Forest SSSI impacting on the site’s condition (‘unfavourable recovering’), albeit another consideration is the desire to improve facilities and encourage accessibility to nature.</p> <p>In conclusion, options that perform poorly are those that would involve higher density development at ‘King George & Goodmayes Hospitals & the Ford Sports Ground’, or large scale additional development in the Fairlop Plain area. There is little basis upon which to suggest the likelihood of significant negative effects, however.</p>											

Reduce the effect of traffic on the environment												
	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7	Option 8	Option 9	Option 10	Option 11	Option 12
Rank	4	★1	4	★1	4	4	4	4	4	★1	4	4
Significant effects?	No											
Discussion	<p>It is apparent that the sites under consideration vary significantly, in terms of the extent to which there would be a reliance on the private car.</p> <ul style="list-style-type: none"> The western corridor is well-served by the London Underground Central Line, and the network of town centres in the west of the borough. Wanstead is particularly well served by bus routes, connecting the area to much of East London. Woodford Broadway, South Woodford and Wanstead Town Centres provide a number of amenities including retail, pharmacies and banks. Oakfield performs well, with the Barkingside District Centre and Fairlop London Underground Station (Central Line) a short walk from the site, and given bus routes connecting the site with Althamstow, Woodford, Loughton, Hainault, Romford, Beacontree Heath, Ilford and Gants Hill, and the N8 night route connecting the site with London Victoria. The Redbridge Sports and Leisure Centre is adjacent to Oakfield and Fairlop Waters Country Park can be accessed by a short walk. Whilst there would be a risk of some increased traffic congestion (e.g. Fulwell Cross round-about), it is not clear that this is a particularly sensitive site in this respect (further work is ongoing to explore traffic flows and mitigation options). 											

- ‘King George & Goodmayes Hospitals & the Ford Sports Ground’ performs less well as a location for growth, with Newbury Park Underground Station approximately 1 km to the west, Goodmayes Station (due for service improvements following Crossrail) approximately 1km to the south and local bus routes to the borough’s town centres quite limited, particularly to the east of the site. Furthermore, higher density development would lead to reduced permeability through the site.
- Similarly, Billet Road is relatively poorly linked to the transport network (indeed, it is less well linked than ‘King George & Goodmayes Hospitals & the Ford Sports Ground’).
- Green Belt sites in the Fairlow Plan area will typically be located some distance from public transport and town centres, leading to car dependency.

However, it is very difficult to draw strong conclusions regarding the relative merits of the alternatives. What is perhaps most clear is that Option 4 (the preferred option) **performs well**, as does Option 2 (lower growth with nil at Billet Rd) and Option 10 (higher growth through higher density development in the Western Corridor). There is an argument to suggest that these three options would lead to significant positive effects; however, there is much uncertainty.

Reduce contributions to climate change and reduce vulnerability to climate change

	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7	Option 8	Option 9	Option 10	Option 11	Option 12
Rank	4	4	4	4	★1	4	★1	4	★1	4	4	4
Significant effects?	No											
Discussion	There are a number of opportunities to deliver district heating infrastructure, and thereby minimise per capita greenhouse gas emissions from the built environment. One area where there is an identified opportunity is ‘King George & Goodmayes Hospitals & the Ford Sports Ground’, and hence it is assumed that options involving higher density at this site (Options 5, Option 9 and to a lesser extent Option 7) perform well (as higher density development supports district heating viability). However, the site is less than ideal from a climate change adaptation perspective, given flood risk along the Seven Kings Water. This could be a constraint to higher density development; however, equally it could still be possible to avoid vulnerable uses in the flood risk zone and/or mitigate risk through design.											

Minimise the production of waste and encourage recycling

	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7	Option 8	Option 9	Option 10	Option 11	Option 12
Rank	N/a											
Significant effects?	N/a											
Discussion	This objective is not applicable to the current appraisal. It should be possible to manage waste sustainably under any reasonably foreseeable scenario.											

Encourage sustained economic growth												
	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7	Option 8	Option 9	Option 10	Option 11	Option 12
Rank	=	=	=	=	=	=	=	=	=	=	=	
Significant effects?	Yes											
Discussion	<p>A priority is to direct growth to the borough’s Investment and Growth Areas of Ilford, the Crossrail Corridor, Gants Hill, South Woodford and Barkingside; and also increase the capacity, quality and density of the borough’s Strategic Industrial Location (SIL) at Hainault Business Park and Southend Road Business Area to enable new and emerging businesses in sectors that are projected to expand in the future. On this basis, the alternatives perform broadly on a par, and all would lead to significant positive effects. Whilst it is feasible that a Green Belt development would be mixed use - i.e. deliver new employment floorspace alongside housing - it is not possible to assume that this would be the case. This area is not particularly well linked to the strategic transport network (although it is noted that Hainault Business Park functions well in this location).</p>											

Improve incomes and living standards												
	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7	Option 8	Option 9	Option 10	Option 11	Option 12
Rank	=	=	=	=	=	=	=	=	=	=	=	
Significant effects?	No											
Discussion	<p>There is little potential to differentiate the alternatives, recognising that regeneration initiatives (notably Ilford town centre) are a constant across all options, and so the alternatives are judged as performing broadly on a par. Whilst regeneration is also an aim within the Crossrail Corridor, and housing growth at ‘King George & Goodmayes Hospitals & the Ford Sports Ground’ and Billet Road would support a ‘joined-up’ approach to achieving this, it is difficult to foresee notable effects in terms of ‘improved incomes and living standards’.</p>											

Enhance the image of the area as a business location												
	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7	Option 8	Option 9	Option 10	Option 11	Option 12
Rank	=	=	=	=	=	=	=	=	=	=	=	
Significant effects?												
Discussion	<p>High quality new housing will contribute to the image of the borough as a business location (suggesting that higher growth options might be preferable), although equally open space will contribute (suggesting that lower growth options might be preferable). Any effects would be minor, and it is not possible to differentiate the alternatives (i.e. they perform on a par).</p>											

Provide a high quality, reliable transport network to support the development of the borough												
	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7	Option 8	Option 9	Option 10	Option 11	Option 12
Rank	=	=	=	=	=	=	=	=	=	=	=	=
Significant effects?												
Discussion	<p>The potential to avoid worsened traffic and encourage walking, cycling and public transport is discussed above, under the heading of 'Reduce the effect of traffic on the environment'; and it is difficult to differentiate the alternatives in terms of the potential to support upgrades to the local transport network. It is noted that 'King George & Goodmayes Hospitals & the Ford Sports Ground' is associated with opportunities to improve walking/cycling links, and possibly also improved bus services; however, this is a relatively minor consideration, recognising that under any of option there will be a focus of investment in several areas of the borough directly leading to transport enhancements.</p> <p>On balance, it is appropriate to conclude that the alternatives perform broadly on a par in terms of this objective. 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).</p>											

Alternatives appraisal conclusions

Topic ³⁶	Rank of performance / categorisation of effects											
	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7	Option 8	Option 9	Option 10	Option 11	Option 12
	Minimum growth No Oakfield or Billet Rd)	Lower growth 1 (no Billet Rd)	Lower growth 2 (no Oakfield)	Preferred Option	Variation on PO 1 (No Oakfield; Higher density at Goodmayes)	Variation on PO 2 (No Oakfield; Higher density in Western Corridor)	Variation on PO 1 (No Oakfield; Higher density at Goodmayes and Billet Rd)	Variation on PO 1 (No Oakfield; Extra Green Belt)	Higher growth 1 (higher density at Goodmayes)	Higher growth 2 (higher density in Western Corridor)	Higher growth 3 (extra GB)	High growth (extra GB)
Poverty	=	=	=	=	=	=	=	=	=	=	=	=
Crime	=	=	=	=	=	=	=	=	=	=	=	=
Housing	12	11	10	5	8	8	7	5	3	3	2	★1
Education	6	★1	6	★1	6	6	6	6	★1	★1	★1	★1
Services	★1	★1	★1	★1	11	11	10	★1	★1	★1	★1	★1
Health	★1	★1	★1	★1	11	11	10	★1	★1	★1	★1	★1
Land/town- scape	★1	★1	3	3	5	5	5	5	5	5	5	12
B'diversity	★1	★1	★1	★1	10	★1	9	★1	10	★1	★1	10
Traffic / transport	4	★1	4	★1	4	4	4	4	4	★1	4	4
Climate change	4	4	4	4	★1	4	★1	4	★1	4	4	4
Economy	=	=	=	=	=	=	=	=	=	=	=	=

³⁶ N.B. These topics are derived from the 15 objectives that comprise the SA framework.

Alternatives appraisal conclusions (Cont'd)

In conclusion, it is apparent that some options perform better than others, but that there is no obviously best performing / 'most sustainable' option.

Key considerations are as follows:

- **Poverty** - The alternatives perform on a par. Whilst certain options are better suited to the delivery of community infrastructure (see discussion below), it is not clear that there will be implications for poverty and social exclusion (recognising that the alternatives do not vary in terms of approach to growth in the south of the borough; where major benefits are set to be realised, most notably at Ilford). King George & Goodmayes Hospitals & the Ford Sports Ground is notable for being well linked to the Crossrail corridor, but it is not clear that this will translate into 'poverty and social exclusion' benefits.
- **Crime** - The alternatives perform on a par. Whilst certain options are better suited to the delivery of a high quality and legible urban realm (see discussion below, under 'townscape'), it is not clear that there will be implications for crime.
- **Housing** - In general, there is a need to deliver higher growth in order to more fully meet objectively assessed housing needs; also, there is a need to deliver an appropriate housing mix, in terms of type (family housing is needed) and tenure (affordable housing is needed). Options involving higher growth at 'King George & Goodmayes Hospitals & the Ford Sports Ground' or in the Western Corridor (Options 5, 6, 8 and 9) perform relatively poorly, given implications for the desired housing mix.
- **Education, services and health** - Oakfield is a growth location that performs well given its location (good access to Barkingside, public transport, leisure facilities and open space) and given potential to deliver a new school and health facility; albeit there remain some uncertainties in respect of re-providing for lost sports pitches (with no net loss in the quality of provision locally). Options involving higher growth at 'King George & Goodmayes Hospitals & the Ford Sports Ground' or in the Western Corridor (Options 5, 6, 8 and 9) perform relatively poorly, given issues around delivering community infrastructure.
- **Landscape/townscape** - There are clear sensitivities locally, and so lower growth performs well. Billet Road is assumed to be sensitive from a landscape perspective, given that past Green Belt Reviews have found the area to contribute to Green Belt purposes; the borough's Western Corridor is highly sensitive from a heritage perspective; higher density growth at 'King George & Goodmayes Hospitals & the Ford Sports Ground' would compromise design / urban realm objectives; and additional Green Belt development would clearly impact significantly on the Fairlop Plain's characteristic openness.
- **Biodiversity** - Higher density development at 'King George & Goodmayes Hospitals & the Ford Sports Ground' could place pressure on Seven Kings Water, which is an important ecological corridor (given potential for deculverting and restoration). Also, whilst much of the Fairlop Plain area comprises arable farmland likely to be of limited biodiversity value, it is noted that a significant area is farmed under an agri-environment agreement, plus there is a need to consider the possibility of growth in proximity to Hainault Forest SSSI impacting on the site's condition (which is 'unfavourable recovering').
- **Transport and traffic** - Whilst it is difficult to draw strong conclusions in the absence of detailed assessment, it is apparent that certain locations - notably Billet Road and Fairlop Plain, and to a lesser extent 'King George & Goodmayes Hospitals & the Ford Sports Ground' - are less well linked to existing centres and public transport.
- **Climate change** - There are a number of opportunities to deliver district heating infrastructure, and thereby minimise per capita greenhouse gas emissions from the built environment. One area where there is an identified opportunity is 'King George & Goodmayes Hospitals & the Ford Sports Ground', and hence it is assumed that options involving higher density at this site (Options 5 and 8) perform relatively well (as higher density development supports district heating viability).