

Sustainability Appraisal (SA) of the Redbridge Local Plan

Interim SA Report

March 2017

REVISION SCHEDULE

Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	March 2017	Interim SA Report focused on spatial strategy alternatives	Mark Fessey Principal Consultant	Steve Smith Technical Director	Steve Smith Technical Director

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1 INTRODUCTION

1.1 Background

- 1.1.1 The Redbridge Local Plan, once adopted, will set out strategic policies, allocate sites and set out development management policies to guide the determination of planning applications across the Borough up until 2030.
- 1.1.2 The Local Plan is at an advanced stage of preparation, with the Pre-Submission Plan having been published in summer 2016, under Regulation 19 of the Local Planning Regulations. The next stage is submission of the Plan to Government for independent examination.
- 1.1.3 A large number of representations were received on the Pre-Submission Plan, including from the Greater London Authority (GLA). A key issue related to proposed release of Green Belt to meet the borough's housing and infrastructure needs, with the GLA raising concerns on the basis that the "exceptional circumstances" needed to justify Green Belt release had not been demonstrated.¹ The GLA considers that higher density housing in Ilford, and other Investment and Growth Areas in the Borough, could negate the need for Green Belt release.
- 1.1.4 As such, the London Borough of Redbridge ('the Council') identified a need to undertake further work to explore the justification for the proposed spatial strategy. In particular, a decision was taken to re-examine 'spatial strategy alternatives' through the SA process.

1.2 Sustainability Appraisal

- 1.2.1 The Local Plan is being developed alongside a process of Sustainability Appraisal (SA), a legally required process that aims to ensure that the significant effects of an emerging draft plan, and alternatives, are systematically considered and communicated.
- 1.2.2 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations (the 'Strategic Environmental Assessment Regulations') 2004.

[This Interim SA Report](#)

- 1.2.3 The aim of this Interim SA Report is to present an appraisal of spatial strategy alternatives, with a view to informing the Local Plan Examination.
- 1.2.4 This Interim SA Report sets out to answer three questions:
1. What has plan-making / SA involved up to this point?
 2. What are the SA findings at this stage,
i.e. in relation to spatial strategy alternatives?
 3. What happens next?

N.B. This is an 'interim' report on the basis that it focuses on a specific matter – namely the appraisal of spatial strategy alternatives – as opposed to the Plan as a whole (the remit of the SA Report) or Proposed Modifications (the remit of SA Report Addenda). This report does not seek to replace the Redbridge Local Plan SA Report, which was published alongside the Pre-Submission Plan in 2016, and does not seek to present all of the information required of the SA Report. However, it is naturally the case that some of the information presented within this report updates and supersedes that within the SA Report. Links between the reports are made clear throughout.

¹ Paragraph 83 of the National Planning Policy Framework (NPPF) states: "Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan."

Scope of the Sustainability Appraisal

1.2.1 The scope of SA work, with respect to the Redbridge Local Plan, is introduced within the SA Report (2016). Essentially, the scope is reflected in a list of sustainability objectives, established through SA ‘scoping’ - a process of reviewing the context in which the plan is being prepared, establishing a baseline position against which to gauge impacts, identifying specific sustainability issues to which the plan should ideally respond and consulting the Environment Agency, Historic England and Natural England for their views. The sustainability objectives provide a methodological ‘framework’ for appraisal – see **Table 1.1**.

N.B. Health and equalities objectives are reflected within the SA framework, and hence health and equalities issues/impacts are discussed within this report as appropriate.

Table 1.1: The SA framework

Sustainability objectives	
1.	Reduce poverty and social exclusion
2.	Reduce and prevent crime and the fear of crime
3.	Meet local housing needs by giving everyone the opportunity to live in a decent, affordable home
4.	Improve the education and skill of the population overall
5.	Provide accessible community services and leisure opportunities
6.	Promote healthy lifestyles
7.	Maintain, enhance and where appropriate conserve the quality of landscapes and townscapes
8.	Maintain and enhance biodiversity , species and habitats
9.	Reduce the effect of traffic on the environment
10.	Reduce contributions to climate change and reduce climate change vulnerability
11.	Minimise the production of waste and encourage recycling
12.	Encourage sustained economic growth
13.	Improve incomes and living standards
14.	Enhance the image of the area as a business location
15.	Provide a high quality, reliable transport network to support the development of the Borough

2 WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT?

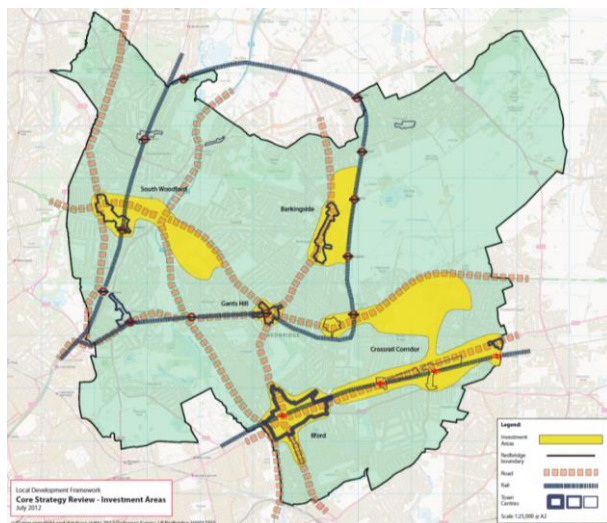
2.1 Introduction

- 2.1.1 The Local Plan-making / SA process has been ongoing for a number of years, as explained within 'Part 1' of the SA Report ("What has plan-making / SA involved up to this point?").
- 2.1.2 The aim here is to explain the work undertaken in early 2017, in light of representations received on the Pre-Submission Plan, to establish the spatial strategy alternatives that are the focus of appraisal at the current time (see Chapter 3).²
- 2.1.3 There is firstly a need to 'set the scene' with a discussion of the following stages in the plan-making / SA process, which provided context to developing alternatives in early 2017:
 - 1) Preferred Options Report (POR) consultation (**2013**)
 - 2) Preferred Options Report Extension (PORE) consultation (**2014**)
 - 3) Publication of the Pre-Submission Plan (**2016**)
 - 4) Further evidence gathering post publication (**2016/17**)
- 2.1.4 The final section within this chapter then explains how evidence and understanding was drawn upon in early **2017** to establish the reasonable spatial strategy alternatives.

2.2 Preferred Options Report consultation (2013)

- 2.2.1 Understanding at the time was 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 – understood to be at least 2,000 dpa - but providing for 11,400 new homes 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 (2010).
- 2.2.2 The Preferred Options Report proposed to make provision for 11,400 homes across a series of **Opportunity Sites** (Map 1 of the consultation document), and sought to achieve a particular focus within five **Investment Areas** (Map 2 and Figure 2.1).

Figure 2.1: Investment areas 2013



² In accordance with the SEA Regulations, the aim is to provide 'an outline of the reasons for selecting the alternatives dealt with', and demonstrate that the alternatives are 'reasonable'.

2.3 The Preferred Options Report Extension consultation (2014)

The consultation document

2.3.1 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, see above), 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.**” [emphasis added]*

2.3.2 The consultation document identified four spatial strategy alternatives:

- 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 and Fords Sports Ground (to enable no Oakfield)
- 3) Proceed with the proposals as per the POR, except with higher density redevelopment within the Woodford to Wanstead ‘Western Corridor’ (to enable no Oakfield)
- 4) Proceed with the proposals as per the POR, except with additional development at unspecified sites in the Green Belt (to enable no Oakfield).

Sustainability Appraisal

2.3.3 An appraisal of the four alternatives was presented within Appendix B of the consultation document. The appraisal identified that all options are associated with pros and cons, i.e. the choice of option would involve a need to ‘trade-off’ between competing strategic objectives.

2.3.4 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 performed best in terms of ‘deliverability’, given that the whole of the Oakfield site is owned by the Council, and whilst there are some leases to the sporting clubs that currently occupy the site, there are no major impediments to bringing it forward for redevelopment.

Consultation responses

- 2.3.5 Many important issues were raised through the consultation, including the following:
- Historic England suggested that Option 1 would cause least harm to the historic environment, although noted the need to further consider archaeology. Other findings were: Option 2 requires further details about the impact on the Little Heath Conservation Area and how it will inform development, but support is given to retaining the locally listed Goodmayes Hospitals, 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; Option 4 could lead to issues in respect of the Green Belt purpose to 'preserve the setting and special character of historic towns'; and more generally there is a risk of impacts to heritage assets.
 - The Environment Agency highlighted that Option 2 would require the sequential test to be passed, a Level 2 Flood Strategic Flood Risk Assessment to be undertaken, 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 flood storage role of Green Belt sites, particularly within the Roding Valley.
 - 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 and other organisations.
 - 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 Option 2.
- 2.3.6 It is also important to note that a large number of representations were received in relation to **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 that 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.

2.4 Publication of the Pre-Submission Plan (2016)

Introduction

2.4.1 The aim here is to –

- 1) Explain the process of developing the spatial strategy alternatives in 2016
- 2) Present a summary of spatial strategy-related appraisal findings from the SA Report
- 3) Summarise key representations received in relation to the spatial strategy.

Developing spatial strategy alternatives (2016)

2.4.2 Subsequent to the Preferred Options Extension Consultation (see above), the London Plan (2015) set a housing target for Redbridge of 1,123 dpa, or 16,845 homes over the plan period.

2.4.3 This target was based on the London-wide SHLAA of 2013, which took into consideration the potential housing capacity of three Green Belt sites – 1) Oakfield 2) King George/Goodmayes Hospitals and 3) Fords Sports Ground - 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 Preferred Options Report (2014).

2.4.4 Understanding of housing needs was then updated in 2016, on the basis of a new Strategic Housing Market Assessment (SHMA) for the North London Housing Market Area (covering the London Boroughs of Barking and Dagenham, Havering and Redbridge) identifying that Objectively Assessed Housing Need (OAHN) equates to 2,132 dpa, or 31,977 dwellings over the plan period, i.e. a figure almost double the target set by the London Plan (2015).

2.4.5 Given the London Plan housing target, the up-to-date understanding of housing needs and the range of potential development sites in the Borough, it was recognised that there was a need to develop, appraise and consult on alternative spatial strategies that varied in terms of both 'quantum' (or level of growth) and 'distribution' (or location of growth).

2.4.6 With regards to **quantum**, there was a need to consider providing for the London Plan target, and also higher growth options. However, it was determined that any option involving meeting OAHN in full could be dismissed as 'unreasonable', 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. However, it was recognised that higher growth options that would significantly exceed the London Plan target, but still involve not meeting OAHN, would help in 'closing the gap' between housing supply and OAHN, as required by the London Plan (Policy 3.3).

2.4.7 With regards to **distribution**, it was explained (para 6.3.7 of the SA Report) that, whilst many aspects of the Council's strategy were firmly evidenced, and hence could be taken as 'givens', the following issues / sites remained contentious, and so needed to be 'variables' across the alternatives:

- Oakfield - should it be allocated for c.600 homes, or not?
- King George/Goodmayes Hospitals and Fords Sports Ground - should it be redeveloped at a relatively low density, or at a higher density?
- Western Corridor (Woodford to Wanstead) - should the opportunity sites be redeveloped at a relatively low density, or at a higher density?
- Billet Road - 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 and so identify additional 'least worst' sites for housing development?

- 2.4.8 The list of variables was identified in light of a number of factors, including the Green Belt Review 2016, the findings of which were summarised in paras 6.2.13 – 6.2.16 of the SA Report. The SA Report also explained (para 6.3.7), that the list of variables was very similar to that reflected in the alternatives developed, appraised and consulted on in 2014, at the time of the Preferred Options Report Extension consultation.
- 2.4.9 Given this list of variables, twelve reasonable spatial strategy alternatives were established. These alternatives were presented in summary within Table 6.2 of the SA Report, and in detail in Table 6.3. The summary table is repeated here as **Table 2.1**.

Table 2.1: Reasonable spatial strategy alternatives 2016 (summary)

Option	Quantum	Distribution <i>As per the Preferred Option (PO), 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	PO (18,450 homes)	-
5	Variation on PO 1 (18,450 homes)	No Oakfield; Higher density at G'mayes/King George/Ford
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 G'mayes/King George/Ford and Billet Rd
8	Variation on PO 4 (18,450 homes)	No Oakfield; Extra Green Belt
9	Higher growth 1 (19,050 homes)	Higher density at G'mayes/King George/Ford
10	Higher growth 2 (19,050 homes)	Higher density in Western Corridor
11	Higher growth 3 (19,050 homes)	Extra Green Belt
12	High growth (19,650 homes)	Extra Green Belt

N.B 'Extra GB' refers to undefined Green Belt site(s), assumed to be in the Fairlop Plain area.

- 2.4.10 Several final points were made to explain the alternatives. In particular, there was a need to explain that Option 7 was something of an anomaly, as it was the only option to involve medium growth at 'Goodmayes/King George/Ford' (1,550 homes) and higher growth at Billet Rd (1,500). Option 7 was a late addition, after being put forward as a motion by Councillors at Neighbourhoods Service Committee meeting on 26th May 2016. Similarly, Option 12 was something of an anomaly, in that it represented just one of numerous ways that high growth could be achieved.

[Spatial-strategy-related appraisal findings \(2016\)](#)

- 2.4.11 The SA Report published for consultation alongside the Pre-Submission Plan presented information on the spatial strategy alternatives within 'Part 1' ("What has plan-making / SA involved up to this point?"). Specifically, within **Part 1 of the SA Report**: Chapter 6 explained the process of developing the reasonable alternatives; Chapter 7 presented an appraisal of the reasonable alternatives; and Chapter 8 presented the Council's response to the appraisal of reasonable alternatives (i.e. the Council's reasons for supporting the preferred approach, in light of alternatives). **Part 2 of the SA Report** ("What are appraisal findings at this current stage") then presented an appraisal of the Pre-Submission Plan as a whole.

- 2.4.12 Key findings from the SA Report, in respect of the spatial strategy, are summarised below. Specifically: **Box 2.1** presents the alternatives appraisal conclusions; **Box 2.2** presents the Council's response to the alternatives appraisal / their reasons for supporting the preferred approach; and **Box 2.3** presents conclusions from the Pre-submission Plan appraisal. Also, for ease of reference, **Figure 2.2** presents the Pre-Submission Plan Key Diagram.

Box 2.1: Reasonable spatial strategy alternatives appraisal (2016)

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 and the Ford Sports Ground are 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 and 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 and 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 and the Ford Sports Ground' would compromise design / urban realm objectives; and additional Green Belt development would clearly impact significantly on Fairlop Plain's characteristic openness.
- **Biodiversity** - Higher density development at 'King George/Goodmayes Hospitals and 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').³
- **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 and 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 and 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).

³ The appraisal should also have highlighted that all of Fairlop Plain is designated as a Site of Importance for Nature Conservation.

Box 2.2: The Council's response to the alternatives appraisal (2016)

The following text is the Council's response to the alternatives appraisal / reasons for supporting the preferred approach (Option 4) -

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

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

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

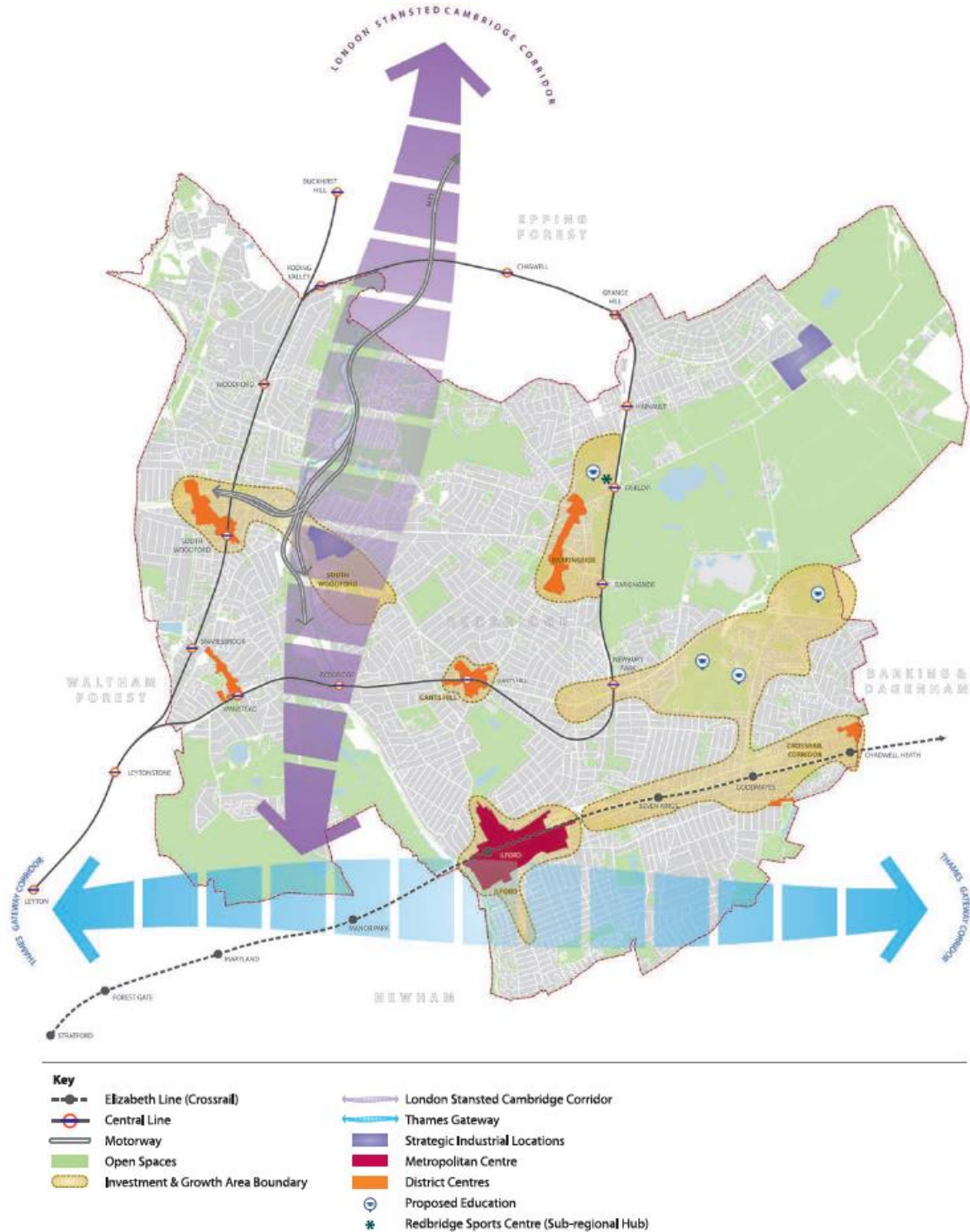
- A lower growth option involving nil growth at Oakfield would compromise the achievement of important housing delivery objectives without leading to a plan that performs notably better in terms of other strategic objectives (recognising the merits of this site, and the potential to address issues at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

Box 2.3: Pre-Submission Plan appraisal (2016)

"The appraisal of the draft (Pre-Submission) plan... 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 and exceed 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.⁴ 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."

⁴ To be clear, the Pre-Submission Plan housing strategy (18,774 homes) involved exceeding the London Plan target (16,845 homes), but not providing for full objectively assessed needs (31,977 homes). However, there is an argument that this is acceptable, in light of: A) National policy (NPPF para 47), which establishes that objectively assessed need must be met within the Housing Market Area (HMA); and B) the London Plan, which treats London as one HMA, and anticipates unmet need being absorbed across the HMA.

Figure 2.2: The Pre-submission Plan Key Diagram



Representations received on the spatial strategy (2016)

- 2.4.13 A large number of representations were received on the Pre-Submission Plan, with many issues raised in relation to the spatial strategy.
- 2.4.14 Most notably, the **GLA** submitted a letter raising concerns in respect of the Pre-submission Plan, with the following specific points made –
- *“... it is the Mayor’s opinion that whilst he supports many aspects of the plan it is not in conformity with the London Plan, as it has not demonstrated “exceptional circumstances” to support the proposed release of Green Belt.”*
 - *“In more general terms, the Mayor recognises that protecting the Green Belt is a challenge facing many boroughs, but considers that they must seek capacity to address housing need without intruding upon it.”*
 - There is a need for further work to explore means of releasing additional capacity, with the example given of proposed sites within the Crossrail Corridor, which *“appear large enough to be able to result in a neighbourhood with a distinctive character at a higher density in line with London Plan Policy 3.7.”*
 - Also in relation to additional capacity, the letter goes on to explain that: *“Other Opportunity Areas in London have shown that they can provide much higher numbers of new homes than indicated in Annex 1 of the London Plan and it is likely that Ilford and other ‘Investment and Growth’ areas [proposed by the plan] have capacity for more housing...”*
 - The letter objects to all six proposed Green Belt release sites, most notably objecting to the following three –
 - Billet Rd – on the basis that the site meets Green Belt and open space tests.
 - King George/Goodmayes Hospitals and Ford Sports Ground – in advance of a comprehensive masterplan any release of Green Belt would be premature.
 - Oakfield – mostly likely meets the criteria to be designated as Metropolitan Open Land, and the All London Green Grid Supplementary Planning Document shows the site to have potential to form part of a Metropolitan Park.
 - Other spatial strategy related matters raised by the letter include –
 - The Council should seek to provide for more affordable homes than the number envisaged by the Pre- Submission Plan (336 per year), which the letter describes as ‘very low’.
 - The Mayor welcomes the general approach of supporting a wide range of housing needs.
 - The Mayor welcomes the commitment to mitigating climate change, and especially welcomes the approach to improving air quality across the Borough.
 - The representation submitted on behalf of the Mayor did not make reference to the findings of alternatives appraisal, although did acknowledge that the Council had explored opportunities and ‘consulted widely on approaches’.
- 2.4.15 The GLA’s position is supported by the **Oakfield Society**, which opposes release of Green Belt at Oakfield for a number of reasons, including: *“Amenity: the part of Oakfield that would be developed is 45 acres of high amenity value open space, 17 adult and youth football pitches, four cricket ovals and two large, modern pavilions. The grass roots sports ground is rated the best in LBR and probably East London. Over 1,000 people use these facilities for sport, recreation and community social activity every week of the year.”* Oakfield Society questions the detailed analysis underpinning the LBR Playing Pitch Strategy and Alternative Playing Pitch Sites Assessment, e.g. suggesting that insufficient consideration has been given to the quality of sports facilities needed for top amateur cricket and football.

- 2.4.16 The Oakfield Society concluded that: *“There are insufficient exceptional circumstances that outweigh the undoubted benefits of Oakfield such that LBR can claim that there is a necessity to develop it for housing. Housing on Oakfield would amount to less than 3% of the Borough’s objectively assessed need in the Plan period. The amount of social and affordable housing would be inconsequential. On the other hand the immense amenity value for the community will be sustained if the well organised, volunteer led sports & social clubs on Oakfield are allowed to continue on site.”* There is also the suggestion that: *“LBR has not meaningfully cooperated with other Boroughs to identify brownfield sites elsewhere to help meet its objectively assessed housing needs.”*
- 2.4.17 Conversely, there was opposition to the view of the GLA, in particular from NOISE (Neighbourhoods of Ilford South Engage) and the South Woodford Society –
- NOISE submitted a lengthy representation giving numerous reasons why Ilford is not suited for the level of growth proposed by the Pre-Submission Plan, and certainly would not be suited to a higher level of growth (as proposed by the GLA). The group concluded that: *“We feel this Plan will only exacerbate the current problems in Ilford South.”*
 - South Woodford Society concluded that proposed housing growth within the South Woodford Investment and Growth Area cannot be accommodated, given constraints including –
 - Transport - South Woodford is heavily reliant on the Central Line, which is not coping with the current footfall, and it is difficult to see how its potential could be improved. The footfall at South Woodford station is significantly higher than the stations along the Hainault branch where attention for further housing growth should focus.
 - Schools - There are no proposals for new schools in South Woodford so new homes will increase demand for school places in the local area. The school expansion schemes already in place are unprecedented, e.g. sports grounds have been lost.
 - Other infrastructure - The only site which will potentially provide some leisure facility is site 122 which would only be able to accommodate a small scale proposal.
 - Business - The plan allocates all business sites in South Woodford for residential.
- 2.4.18 There is also potentially some conflict with GLA’s position evident in the detailed representations received from **Historic England**. A high level statement is made that: *“The Investment and Growth Areas extend outside the boundaries of the centres... In the case of some centres the indicative areas encompass conservation areas and listed buildings. The plan should be clear that the expectations should take account of the need to reconcile growth ambitions with heritage assets to ensure that development is sustainable in the manner required by the NPPF (para 8), and with the local plan objectives for celebrating and enhancing Redbridge’s heritage.”* The response then went on to consider the extent of conservation areas and listed buildings within the Investment and Growth Areas, generally seeking policy commitments to “respond to, and not detract from” heritage assets.

2.5 Further evidence-gathering (2016/17)

Introduction

2.5.1 In light of the representations received, and in particular the representation submitted on behalf of the London Mayor, the Council recognised a need to undertake some further evidence-gathering work, to feed into further consideration of spatial strategy alternatives.

2.5.2 Five work-streams were progressed -

- 1) Development Opportunity Sites Update (Appendix 1 of the draft Local Plan)
- 2) Transport Study
- 3) Playing Fields Feasibility Study (for Oakfield and the Ford Sports Ground)
- 4) Green Belt Review Addendum
- 5) Appraisal of Green Belt sites (as part of the SA process).

2.5.3 Each of the five work-streams is discussed in turn below.

Development Opportunity Sites Update

2.5.4 There were three aspects to this work-stream:

- 1) Re-examining the non-Green Belt sites listed in Appendix 1 of the Pre-submission Plan
- 2) Re-examining one Green Belt site listed in Appendix 1 of the Pre-submission Plan
- 3) Examining several new non-Green Belt sites submitted to the Council.

2.5.5 In relation to (1), the Council reassessed all sites, applying the London Plan Density Matrix. The work led to **two options**: 1) Average density over-and-above the Pre-submission Plan, but still 'striking a balance'; and 2) Maximising density. Whilst minded to support Option 1, the Council recognised that Option 2 could not be ruled-out, given the GLA's representation on the Pre-submission Plan (see para 2.4.14, above). **Box 2.4** presents further information.

2.5.6 In relation to (2), a lower housing figure of **800 homes**, as opposed to the 1,100 figure in the Pre-submission Plan, was identified as appropriate for Billet Road, to ensure sufficient space for a secondary school and health facility. The decision was taken to progress the 800 homes figure as a proposed modification to the Pre-Submission Plan.

2.5.7 In relation to (3), **nine non-Green Belt sites** came to light through representations made on the Pre-submission, all of which were deemed to be suitable and appropriate for inclusion in Appendix 1 of the Local Plan, with densities calculated as per the approach discussed above.

N.B. Six of the nine sites are train station car parks owned by Transport for London (TfL). The Council was able to reach a conclusion on a density assumption for each; however, it was recognised that there is ongoing work by TfL to examine blocking and massing options, and ultimately determine how best to maximise housing whilst also re-providing car parking. As part of this work, TfL is examining the impacts that would result from any loss of parking.

Box 2.4: Establishing density options for the non-Green Belt Development Opportunity Sites

As discussed above, in-light of concerns raised by the GLA in respect of the Pre-submission Plan, the Council took the opportunity to examine development density at all Development Opportunity Sites.

The London Strategic Housing Land Availability Assessment (SHLAA, 2013) formed the starting point for the study. However, the SHLAA density were then reviewed, applying the London Plan Density Matrix.⁵ Account was also taken of local character, site specific constraints and the floorspace requirements of any proposed non-residential uses. Also, a Tall Buildings Study examined the impact of building scenarios for a selection of sites, in terms of heritage, townscape and micro-climates.

The Council determined that an approach involving a net increase of 448 additional homes would involve ‘striking a balance’ between housing delivery objectives on the one hand, and objectives relating to character, constraints, tall building issues and floorspace requirements on the other – see **Option 1**, below.

Were less weight to given to character, constraints, tall building issues and floorspace requirements, then the Council established that a net increase of 2,889 additional homes could be achieved – see **Option 2**.

Table A: Density options for the non-Green Belt Development Opportunity Sites

	Pre-submission Plan	Option 1 ‘Striking a balance’	Option 2 Maximising densities
Ilford	5,915	6,063	6,623
Crossrail Corridor	2,537	2,897	3,502
Gants Hill	487	573	634
South Woodford	651	487	596
Barkingside	807	514	593
Rest of the Borough	2,627	2,938	3,965
Total homes at non-Green Belt sites	13,024	13,472	15,913

⁵ See <https://www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan/london-plan-chapter-3/policy-34-optimising>

Transport Study

- 2.5.8 The aim of the study was to undertake a high level cumulative assessment of the development proposed within the Local Plan, with a view to establishing the extent of potential transport impacts and informing consideration of mitigation and further work. The study involved a 'quantitative assessment' and a 'qualitative assessment'.
- 2.5.9 The **quantitative assessment** involved developing and applying a spreadsheet model for London Borough of Redbridge. The model provided a mechanism for analysing transport patterns within the context of the baseline situation, the committed situation going forward and the proposed situation based on the implementation of planned growth within the Borough up to 2030. For the purposes of trip distribution and assignment within the spreadsheet model, all of the individual development sites listed in Appendix 1 of the Local Plan, of which there are more than 200, were grouped into approximately 40 'development clusters'. The quantitative assessment found that the most significant increases in traffic are reported in the main growth areas and are also concentrated upon key strategic routes such as the A12 and A118 High Road, with lower levels of traffic growth predicted on non-principal roads in the Borough. Seven junctions were predicted to experience a net traffic increase of between 20-30% under the Local Plan scenario. A further six junctions were predicted to experience an increase in traffic of between 10-20%. Seven stretches of road were also analysed, with the model finding three will experience a net traffic increase of over 20%. N.B. these figures assume 'unconstrained demand', i.e. that junctions / road links can operate beyond capacity. Also, the figures do not allow for potential emerging travel habits, such as modal shift or peak spreading; public transport upgrades (e.g. Crossrail); or potential trip internalisation for example on larger sites, where there will be the potential for complimentary land uses to be provided, thus reducing the need for off-site trips to be made.
- 2.5.10 The **qualitative assessment** involved examining specific proposed site allocations, with each of the sites evaluated against a set of pre-defined criteria including accessibility to public transport, local services and walking and cycling routes. The qualitative assessment concluded that: *"Where possible, it is clear that sites have been chosen which have reasonable access to public transport and local amenities. Some sites however, are inherently less accessible with these tending to be focused around Woodford as well as some locations within East Redbridge... The main issues with these sites are typified by having reduced access to local centres, cycle networks and rail services with the latter often relating to sites being located further than the arbitrary 960m walk threshold from a station, which is the measure employed by TfL within the PTAL calculation."* It should be noted that the qualitative review assumed current accessibility levels and access to services and amenities. It did not take account of potential improvements that may be delivered in the future. This is particularly relevant for Green Belt sites, where due to a lack of existing development, permeability and access to services is inherently relatively low. Development at these sites will have the potential to improve permeability and provide accessibility enhancements.

Playing Fields Feasibility Studies

- 2.5.11 The Council commissioned detailed studies to determine whether it is feasible to relocate the existing sports pitches and facilities at Oakfield and Ford Sports Ground to an equivalent or better standard in a suitable location. The feasibility studies demonstrate that there is scope to relocate pitches and facilities at Oakfield to Hainault and Forest Road Recreation Grounds and pitches and facilities at Fords Sport Ground to Goodmayes Park Extension.

Green Belt Review Addendum (2017)

- 2.5.12 The Review Addendum provided further clarification of how the Green Belt parcels within the Borough contribute to the five purposes set out in the NPPF. There was a focus on applying the national purposes strictly, as opposed to applying any local interpretation. Account was also taken of representations received on the various Green Belt parcels. The conclusions of the Green Belt Review Addendum (2017) are presented in **Table 2.2** and **Figure 2.2**. Ultimately, the study served to confirm the findings of the 2016 Review.

Table 2.2: Conclusions of the Green Belt Review Addendum 2017

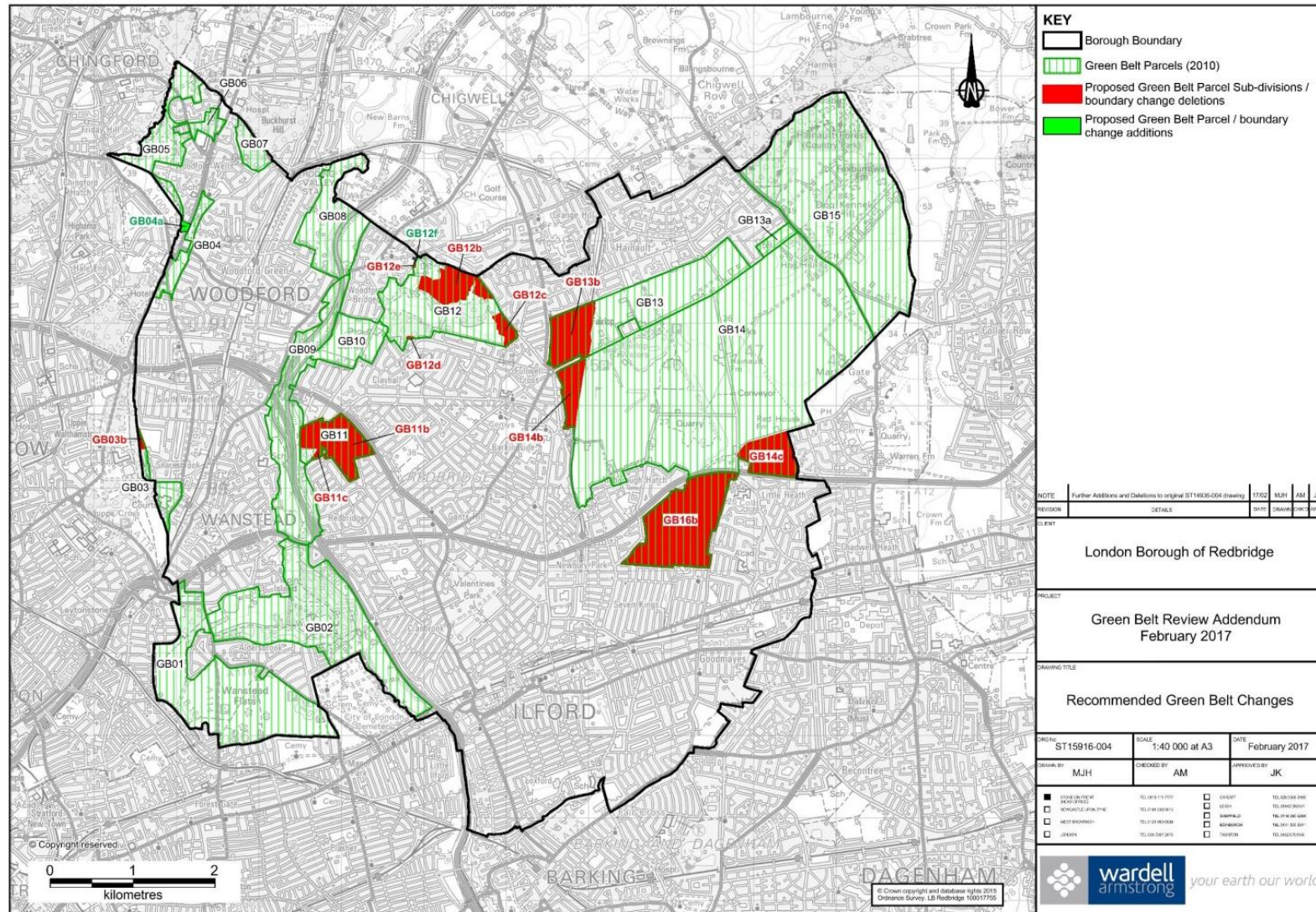
Parcel	Sub-parcel	GB Review finding
GB01: Wanstead Flats		GB
GB02: Wanstead Park		GB
GB03: Snaresbrook Crown Court and Walthamstow Forest		GB*
GB04: Woodford Green		GB**
GB05: Epping Forest Hatch and Woodford Golf Course		GB
GB06: Reed's Forest		GB
GB07: Knighton Wood		GB
GB08: Ray Park (inc. omission site)		GB
GB09: Roding Valley Park		GB
GB10: Roding Lane North		GB
GB11: Roding Hospital	GB11b: N of Spire Roding H'pital (inc. omission site)	Non-GB
	GB11c: E of Roding Lane South	Non-GB
	Remainder (omission site)	GB
GB12: Claybury Hospital	GB12b: Former Claybury Hospital	Non-GB
	GB12c: Existing residential development	Non-GB
	Remainder (inc. omission site)	GB***
GB13: Hainault Fields	GB13a: Forest Park Cemetery & Crematorium	GB
	GB13b: Oakfield (proposed allocation)	Non-GB
	Remainder	GB
GB14: Fairlop Plain	GB14b: King Solomon School	Non-GB
	GB14c: S of Billet Road (proposed allocation)	Non-GB
	Remainder	GB
GB15: Hainault Forest		GB
GB16: King George / Goodmayes Hospitals (2 x proposed allocation)		Non-GB

* GB03b is a small parcel identified as non-GB.

** GB04a is a small area of non-GB identified as meeting GB purposes.

*** GB12c and GB12d are two small parcels identified as non-GB; and GB12f is a small area of non-GB identified as meeting GB purposes.

Figure 2.2: Parcels and sub-parcels of land subjected to Green Belt Review



Appraisal of Green Belt sites

2.5.13 As a fifth and final evidence-gathering work stream, Green Belt site options were appraised in isolation, against the SA framework. A primary consideration was the need to generate evidence in light of paragraph 84 of the NPPF, which states: “When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development.”

2.5.14 The decision was taken to subject eight Green Belt site options to appraisal, comprising -

- A) the four Pre-submission Green Belt allocations; and
- B) four omission sites – i.e. promoted sites not proposed for allocation.

N.B. These are all of the omission sites. It is also worth being clear that Green Belt sub-parcels proposed for release but not proposed for development (e.g. GB12b) need not be appraised. They are not available for development, and hence not omission sites.

2.5.15 **Figure 2.3** shows the eight sites. Appraisal findings are presented in **Appendix I**, with summary findings in **Table 2.3** below.

Figure 2.3: Green Belt site options subject to appraisal

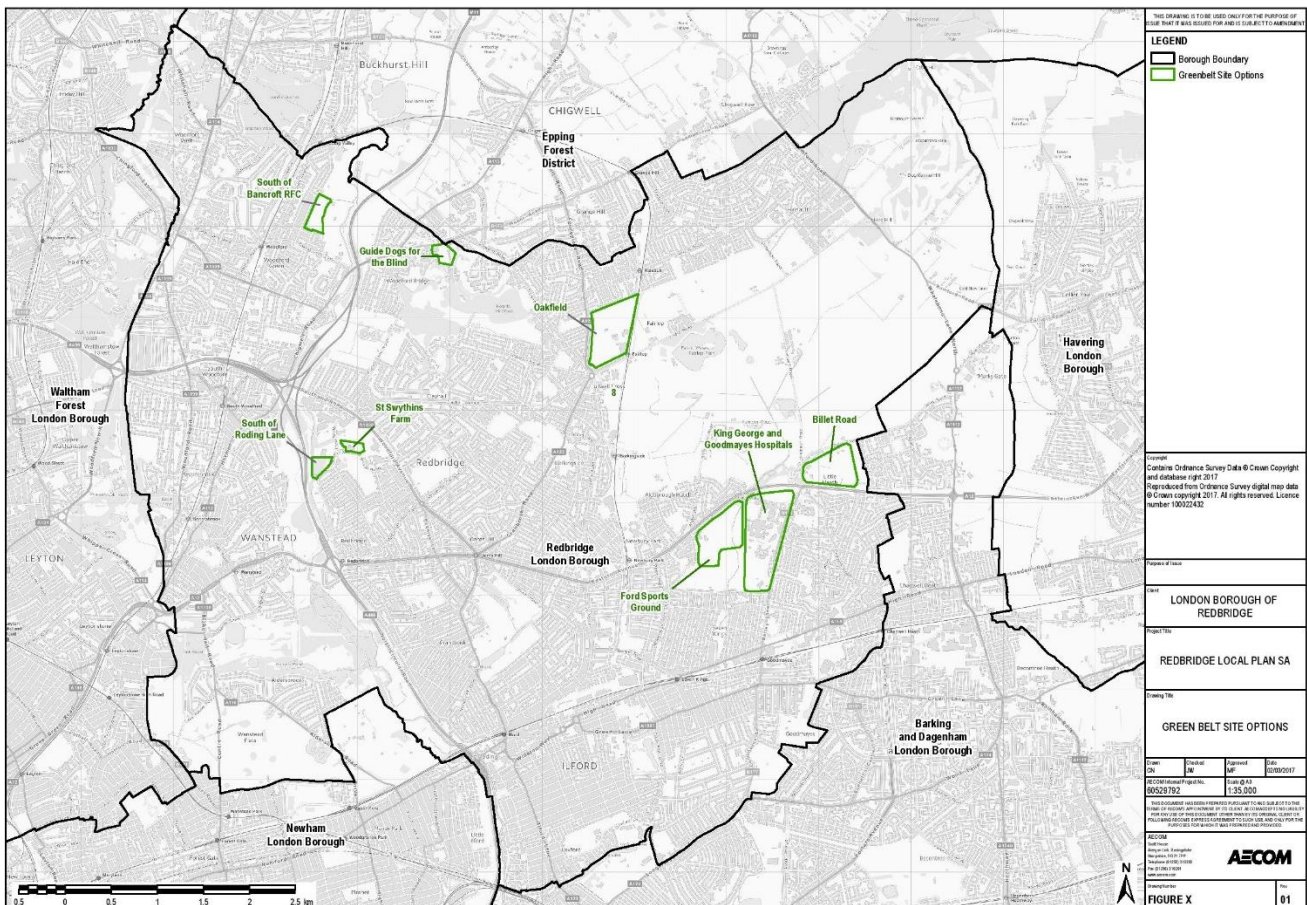


Table 2.3: Green Belt site options appraisal: Summary findings⁶

GB Parcel	Site	GB Review	Proposal	Summary appraisal findings
GB08 (part)	S of Bancroft Rugby Football Club, Woodford	Meets GB purposes	350 homes	In close proximity (c.0.5 miles) to both Woodford and Roding Valley Central Line stations, and Woodford Local Centre, but distant from a District Centre. The site has been found by GB Review to contribute to the purposes of the GB, and is also constrained from a heritage perspective, given adjacent Ray Park, which contains a locally listed building with an associated walled garden that is nationally listed (Grade II).
GB11b (part)	St Swythin's Farm	Does <u>not</u> meet GB purposes	118 homes	Not well linked to a District Centre, Local Centre or underground station, but near Strategic Industrial Land (SIL), adjacent to a recreation ground and falling within the South Woodford Investment and Growth Area.
GB11 (part)	S of Roding Spire Hospital	Meets GB purposes	60 homes	Not well linked to a District Centre, Local Centre or underground station, but close to a SIL and a recreation ground. The site has been found by GB Review to contribute to the purposes of the GB, and there are environmental constraints, given that the site is a designated Site of Importance for Nature Conservation (SINC), and the river is adjacent (although a bund prevents flood risk).
GB12 (part)	Guide Dogs for the Blind	Meets GB purposes	200 homes	Distant from a District Centre or underground station, but close to Woodford Bridge Local Centre and relatively well linked to the strategic road network, and bus corridors. The site has been found by GB Review to contribute to the purposes of the GB, and the site is adjacent to Claybury Conservation Area.
GB13b	Oakfield	Does <u>not</u> meet GB purposes	600 homes mixed use	Excellent access to Barkingside District Centre, Fairlop underground station, leisure facilities, and open space at Fairlop Country Park. Expected to deliver a new secondary school, health facility and community hub; and redevelopment offers the potential to improve and enhance Redbridge Sports Centre. Existing playing pitches and facilities will be re-provided, in accordance with Policy 35 of the Local Plan. Concerns regarding the quality of re-provision have been expressed; however, the Council's Playing Pitch Feasibility Study (2017) demonstrates scope to re-provide at Hainault and Forest Road Recreation Grounds.

⁶ These conclusions have been checked by consultants LUC. See further discussion in Appendix I.

GB Parcel	Site	GB Review	Proposal	Summary appraisal findings
GB14c	South of Billet Road	Does <u>not</u> meet GB purposes	800 homes mixed use	Well linked to the strategic road network, but distant from a District Centre or Local Centre and there are traffic concerns. Expected to deliver a new secondary school, health facility and community hub. Relatively unconstrained, although there is potentially some landscape sensitivity, there are hedgerows on-site, and the A12 is a nearby source of noise/air pollution.
GB16 (part)	King George/ Goodmayes Hospitals	Does <u>not</u> meet GB purposes	500 homes mixed use	Distant from a District Centre, although Goodmayes Local Centre is within walking distance to the south (at least from the southern edge; the northern edge being almost 2km distant), which falls within the wider Crossrail Corridor Investment and Growth Area. Expected to deliver a new secondary school, health facility and community hub. The western edge is defined by Seven Kings Water, which has an associated area of flood risk, and a significant area is designated as locally important for biodiversity. Heritage is another constraint, given extensive locally listed buildings.
GB16 (part)	Ford Sports Ground	Does <u>not</u> meet GB purposes	850 homes mixed use	Distant from a District Centre, although Goodmayes Local Centre is within walking distance to the south (at least from the southern edge; the northern edge being almost 2km distant), which falls within the wider Crossrail Corridor Investment and Growth Area. Expected to deliver a new secondary school, health facility and community hub. The eastern edge is defined by Seven Kings Water, which is associated with an area of flood risk and land designated as locally important for biodiversity. Existing playing pitches and facilities will be re-provided at Goodmayes Park Extension, in accordance with Policy LP35.

2.6 Developing the reasonable alternatives (2017)

2.6.1 The reasonable alternatives arrived at, in-light of the factors discussed above, are presented below in **Table 2.4**. Explanatory text is then presented in **Box 2.6**. The following initial points help to explain the table:

- The alternatives are listed in order of the quantum of Green Belt (GB) release, and total housing growth quantum.
- Option 2 is the Council’s preferred option, i.e. the Pre-Submission Plan strategy modified to account for revised densities, several new sites and lower yield from Billet Road.
- Figures for the Investment and Growth Areas and Rest of the Borough are total figures from the start of the plan period (2015), and hence include some completions (i.e homes already built) and permissions (i.e. new homes already granted planning permission by the Council).

Table 2.4: The reasonable alternatives (2017)

		Option 1 – Higher urban densification / no GB release	Option 2 – Urban densification / GB release	Option 3 – Higher urban densification / GB release	Option 4 – Higher urban densification / higher GB release
Windfall		2,700	2,700	2,700	2,700
Investment and Growth Areas	Ilford	6,623	6,063	6,623	6,623
	Crossrail Corridor	3,502	2,897	3,502	3,502
	Gants Hill	634	573	634	634
	South Woodford	596	487	596	596
	Barkingside	593	514	593	593
Rest of the Borough		3,965	2,938	3,965	3,965
Green Belt	King George/Goodmayes	0	500	500	500
	Fords Sports Ground	0	851	851	851
	Billet Road	0	800	800	800
	Oakfield	0	614	614	614
	Omission sites x4	0	0	0	728
Total		18,613	18,937	21,378	23,106
% above LP target		10.5	12.4	26.9	31.2

Box 2.6: Reasons for selecting the reasonable alternatives

In order to understand the reasons for arriving at the four reasonable alternatives there is a need to read this chapter of the report (i.e. Chapter 2) as a whole. This chapter explains how understanding of issues and options has evolved, and been refined over several years.

Most recently, representations were received on the proposed strategy in 2016 (see Section 2.4) and further evidence-gathering was completed in late 2016 / early 2017 (see Section 2.5). This new evidence and understanding led to a need to refine the reasonable alternatives published within the SA Report (2016).

Having made these initial points, each of the four alternatives is considered in turn below –

Option 1 - Higher urban densification / no GB release

A key consideration, when developing reasonable alternatives for appraisal in 2017, was a desire to test the option advocated by the GLA, which is an approach that seeks to exhaust all densification opportunities and avoid removing land from the Green Belt. The London Plan target would be exceeded by 10.5%.

Option 2 - Urban densification / GB release

This is the Pre-Submission strategy (2016) modified to account for revised densities, several new sites and lower yield from Billet Road. It involves taking a 'balanced' approach to urban densification, with the corollary that Green Belt release is necessary. The London Plan target would be exceeded by 12.4%.

N.B. An option involving this approach to densification (i.e. 'balanced' densification) plus nil Green Belt release would fall 673 homes (4%) short of the London Plan target, and hence is an **unreasonable option**.

Option 3 - Higher urban densification / GB release

Numerous other options for meeting / exceeding the London Plan housing target can be envisaged. Indeed, all of the options appraised in 2016 (see Table 2.1, above) remain *potentially* reasonable.

However, given a desire to reduce the number of alternatives to a reasonable and manageable level, the decision was taken in early 2017 not to explore options involving different combinations of sites, in the manner of the 2016 alternatives. Rather, it was determined appropriate and reasonable to assume a binary choice to be made in respect of the Pre-Submission Green Belt housing sites: 1) allocate all four sites to deliver 2,765 homes; or 2) allocate none of the sites. This decision was taken in light of the additional evidence-gathering work completed in late 2016 / early 2017, which did not serve to assign a clear order of preference to the sites.

This assumption led to Option 3, which would involve both maximum urban densification (as per Option 1) plus allocation of the Pre-Submission Green Belt sites (as per Option 2). The London Plan target would be exceeded by 26.9%.

Option 4 - Higher urban densification / higher GB release

Finally, it was determined appropriate to define a higher growth option, which would involve further seeking to close the gap between housing supply and housing needs. Given the findings of the Council's work to review density at Development Opportunity Sites (see Section 2.5) there is no potential for additional homes on non-Green Belt sites (i.e. a quantum over-and-above Options 1 and 3), hence the only option would be to find additional capacity from Green Belt sites. These considerations led to the definition of Option 4. The London Plan target would be exceeded by 31.2%.

As for the choice of Green Belt sites, it was determined reasonable to assume that the four omission sites that are being actively promoted (see Table 2.3) would be allocated. Again, given a desire to reduce the number of alternatives to a reasonable and manageable level, the decision was taken not to explore options involving different combinations of sites. Rather, it was determined appropriate and reasonable to assume a binary choice to be made in respect of the omission sites: 1) allocate all four to deliver 728 homes; or 2) allocate none. This decision was taken despite St. Swithin's Farm standing-out as not meeting the Green Belt purposes.

Finally, it is worth noting that this approach was a departure from that taken in 2016, when it was assumed that Green Belt sites in contention, other than the four proposed for release/development through the Plan, would likely fall within the Fairlop Plan. It is now recognised that the Fairlop Plain is unlikely to be a focus of growth, given environmental sensitivity, and given that no sites there are being actively promoted.

3 WHAT ARE THE SA FINDINGS AT THIS STAGE?

3.1 Introduction

3.1.1 This chapter presents appraisal findings in relation to the reasonable alternatives.

3.2 Methodology

3.2.1 For each of the alternatives, the assessment identifies / evaluates ‘likely significant effects’ on the baseline, drawing on the sustainability topics / objectives identified through scoping (see Chapter 2) as a methodological framework. To reiterate, the sustainability topics are:

- Poverty
- Crime
- Housing
- Education
- Services
- Healthy lifestyles
- Landscapes/townscapes
- Biodiversity
- Traffic
- Climate change
- Waste
- Economic growth
- Incomes
- Business
- Transport

3.2.2 **Red shading** is used to indicate significant negative effects, whilst **green shading** is used to indicate significant positive effects. Every effort is made to predict effects accurately; however, this is inherently challenging given uncertainty regarding how policy will be implemented in practice. 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 an inevitable need to make considerable assumptions regarding how policy will be implemented ‘on the ground’ and what the effect on particular receptors will be. 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’.


3.2.3 It is also important to note that effects are predicted taking into account the criteria presented within Regulations.⁷ So, for example, account is taken of the duration, frequency and reversibility of effects. Cumulative effects are also considered (i.e. effects resulting from the development in combination with other on-going or planned activity).

3.3 Appraisal findings


3.3.1 Appraisal findings are presented below within 15 separate tables (each table dealing with a specific sustainability topic) with a final table drawing conclusions. The appraisal methodology is explained above, but to reiterate:


For each sustainability topic the performance of each development option 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; and ‘ N/a ’ is used to denote instances where the objective in question is not applicable, because there is no relationship between it and the sustainability topic in question.

⁷ Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004

Reduce <u>poverty</u> and social exclusion				
	Option 1) Higher urban densification / no GB release = 18,613 homes	Option 2) Urban densification / GB release = 18,937 homes	Option 3) Higher urban densification / GB release = 21,378 homes	Option 4) Higher urban densification / higher GB release = 23,106 homes
Rank	4	1 	2	3
Significant effects?	No			
Discussion	<p>Higher density development could potentially hinder regeneration objectives, should there prove to be insufficient community infrastructure to support the additional population.</p> <p>In respect of community infrastructure provision – and in particular provision of sufficient secondary school places – release of the four larger Green Belt sites (Oakfield, King George / Goodmayes Hospitals, Ford Sports Ground and Billet Road) will contribute significantly to addressing existing issues across the Borough. Also, another consideration is that one of the larger Green Belt sites – Billet Road – has the potential to support regeneration objectives for the adjacent Marks Gate Estate, in neighbouring London Borough of Barking and Dagenham.</p> <p>Additional release of the four smaller Green Belt sites (i.e. the omission sites) would not lead to delivery of additional community infrastructure, and hence would serve to further add to strain.</p> <p>In conclusion, community infrastructure considerations lead to a conclusion that Option 1 is worst performing, and Option 2 best performing. There could be a risk of insufficient access to community infrastructure under Option 1 translating into significant negative effects in terms of ‘poverty and social exclusion’; however, this is far from certain.</p>			

Reduce and prevent <u>crime</u> and the fear of crime				
	Option 1) Higher urban densification / no GB release = 18,613 homes	Option 2) Urban densification / GB release = 18,937 homes	Option 3) Higher urban densification / GB release = 21,378 homes	Option 4) Higher urban densification / higher GB release = 23,106 homes
Rank	=	=	=	=
Significant effects?	No			
Discussion	<p>Higher urban densification could have implications for townscape, character and design objectives – including within Ilford Town Centre – however, crime implications are not clear. In conclusion, the alternatives perform on a par, and significant effects are not predicted.</p>			

Meet local <u>housing</u> needs by ensuring that everyone has the opportunity to live in a decent, affordable home				
	Option 1) Higher urban densification / no GB release = 18,613 homes	Option 2) Urban densification / GB release = 18,937 homes	Option 3) Higher urban densification / GB release = 21,378 homes	Option 4) Higher urban densification / higher GB release = 23,106 homes
Rank	4	3	2	
Significant effects?	No			
Discussion	<p>A primary consideration is the 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>In conclusion, it is appropriate to order the alternatives according to the quantum of homes that would be delivered. All of the options would involve meeting the London Plan target, and hence none risk 'significant negative effects'. Option 4 performs well, on the basis that the London Plan target would be exceeded by 31% and Green Belt sites should prove suited to delivery of a good housing mix; however, objectively assessed housing needs would not be met, and hence significant positive effects are not predicted.</p>			

Improve the <u>education and skill</u> of the population overall				
	Option 1) Higher urban densification / no GB release = 18,613 homes	Option 2) Urban densification / GB release = 18,937 homes	Option 3) Higher urban densification / GB release = 21,378 homes	Option 4) Higher urban densification / higher GB release = 23,106 homes
Rank	4		2	3
Significant effects?	Yes	Yes	No	
Discussion	<p>Higher density development would put a strain on community infrastructure, and in particular schools. Conversely, release of the four larger Green Belt sites (Oakfield, King George / Goodmayes Hospitals, Ford Sports Ground and Billet Road) would – it is anticipated - involve delivery of four new secondary schools, and hence would contribute significantly to addressing existing issues across the Borough. Additional release of the four smaller Green Belt sites (i.e. the omission sites) would not lead to additional schools provision, and hence would only serve to further add to capacity issues.</p> <p>In conclusion, Option 1 is worst performing, and Option 2 best performing. Significant effects are predicted, recognising that the baseline situation is one whereby there are considerable school capacity issues locally.</p>			

Provide accessible community services and leisure opportunities

	Option 1) Higher urban densification / no GB release = 18,613 homes	Option 2) Urban densification / GB release = 18,937 homes	Option 3) Higher urban densification / GB release = 21,378 homes	Option 4) Higher urban densification / higher GB release = 23,106 homes
Rank	4	★1	2	3
Significant effects?	No			
Discussion	<p>There is a need to consider the location of sites, and also the potential for development to support community infrastructure provision.</p> <p>Higher urban densification would, it is expected, involve concentrating the population close to District and Local Centres, and in areas with higher PTAL; however, the risk is that existing community infrastructure would reach capacity.</p> <p>The larger Green Belt sites (Oakfield, King George / Goodmayes Hospitals, Ford Sports Ground and Billet Road) vary in respect of their location, with Oakfield being notably well located (with excellent access to Barkingside District Centre, Fairlop Underground Station, leisure facilities at Redbridge Sports Centre, and open space at Fairlop Country Park) and Billet Road being less well located, distant from a District or Local Centre.</p> <p>However, all four larger Green Belt sites would involve delivery of a new secondary school, along with a health facility and small community hub. Two of the sites would involve loss of existing playing pitches, with there being particular concerns in respect of loss of pitches at Oakfield; however, the Council’s Playing Pitches Feasibility Study (2017) serves to demonstrate that there is scope to re-provide pitches off-site.</p> <p>The smaller Green Belt sites (i.e. the omission sites) are all relatively poorly located, in terms of access / PTAL, and would not involve delivery of significant new community infrastructure.</p> <p>In conclusion, the order of performance is judged to be as per that presented above, under ‘Education’. However, there is a degree of uncertainty given the need to re-provide for lost playing pitches at Oakfield, under Option 2, 3 and 4. Significant effects are not predicted.</p>			

Promote healthy lifestyles


	Option 1) Higher urban densification / no GB release = 18,613 homes	Option 2) Urban densification / GB release = 18,937 homes	Option 3) Higher urban densification / GB release = 21,378 homes	Option 4) Higher urban densification / higher GB release = 23,106 homes
Rank	=	=	=	=
Significant effects?	No			
Discussion	<p>Issues discussed above, under the ‘services’ heading, are also relevant here. Another important consideration is access to open space and sports/recreational facilities.</p> <p>All of the Green Belt sites would be expected to provide new publically accessible open space on-site, and it is notable that one of the larger sites – Billet Road – is located within an area of open space deficiency (see Figure 24 of the Pre-submission Plan). Another of the larger sites –</p>			

Oakfield - also performs well, given its location adjacent to Fairlop Country Park, and given potential to deliver upgrades to Redbridge Sports Centre. There are concerns in respect of re-providing for lost sports pitches such that there is no net loss in the quality of provision (see representation received from the 'Save Oakfield Society' at para 2.4.14, above); however, the Council's Playing Pitch Feasibility Study (2017) demonstrates that there is scope to re-provide pitches and facilities at Hainault and Forest Road Recreation Grounds.

Finally, it is necessary to comment on air quality. In this respect it is difficult to differentiate the alternatives, with all sites falling within the Redbridge borough-wide AQMA (declared for annual mean NO2 and PM10 24 hour exceedances). It is difficult to suggest that additional urban densification would lead to air quality problems, given that sites will tend to be in high PTAL areas. There are some concerns regarding traffic generation from Green Belt sites – see discussion below – however, air quality implications are unclear.

In **conclusion**, it is difficult to differentiate between the alternatives, given that determinants of health are wide ranging; and, also on this basis, significant effects are not predicted.

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




	Option 1) Higher urban densification / no GB release = 18,613 homes	Option 2) Urban densification / GB release = 18,937 homes	Option 3) Higher urban densification / GB release = 21,378 homes	Option 4) Higher urban densification / higher GB release = 23,106 homes
Rank	2	1 	2	4
Significant effects?	No			Yes



Higher urban densification would have negative implications for townscape and character, as evidenced by the Council's recent 'Local Plan Appendix 1 update', and the Tall Buildings Study (2017) – see discussion in Section 2.5, above.

The four larger Green Belt sites (Oakfield, King George / Goodmayes Hospitals, Ford Sports Ground and Billet Road) have all been found by the Green Belt Review (2017) to be suitable for removal from the Green Belt, in that they do not contribute to Green Belt purposes; however, there are sensitivities associated with the King George / Goodmayes Hospitals site (heritage) and Billet Road (proximity / linkage to the wider Fairlop Plain).

As for the four smaller Green Belt sites (i.e. the omissions sites), the first point to note is that three of them fall within Green Belt parcels identified as contributing to the Green Belt purposes by the Green Belt Review 2017. Also, two of the sites are close to heritage assets, and one is adjacent to the River Roding.

In **conclusion**, Option 4 is worst performing, and would result in significant negative effects on the assumption that the Green Belt issue translates into a landscape issue. Options 1 and 3 also perform relatively poorly, on the basis of evidence to suggest sensitivity to urban densification locally; however, it is not clear that there would be significant negative effects. It is not clear that it is possible to identify Option 3 as preferable to Option 1, purely on the basis of involving additional housing.

Maintain and enhance <u>biodiversity</u> , species and habitats				
	Option 1) Higher urban densification / no GB release = 18,613 homes	Option 2) Urban densification / GB release = 18,937 homes	Option 3) Higher urban densification / GB release = 21,378 homes	Option 4) Higher urban densification / higher GB release = 23,106 homes
Rank				4
Significant effects?	No			
Discussion	<p>There are notable issues at Land south of the Spire Roding Hospital, which is a designated Site of Importance for Nature Conservation (SINC). Also, parts of the Ford Sports Ground site and the adjacent King George/Goodmayes Hospitals site are designated as a SINC (mainly land associated with Seven Kings Water, which is an important ecological corridor).</p> <p>In conclusion, Option 4 performs poorly given that impacts to a SINC would seemingly be unavoidable. On balance, it is not clear that this would translate into a significant negative effect though, given potential for mitigation (i.e. development of part of the site, with biodiversity enhancement on the undeveloped part).</p> <p>It is difficult to differentiate the other options, with it not being appropriate to conclude simply that lower growth is preferable. There is a need to support growth at relatively non-sensitive locations, and thereby reduce the pressure on sensitive sites (e.g. greenfield sites) outside the Borough (and/or pressure on sensitive sites locally in the next plan period).</p>			


Reduce the effect of <u>traffic</u> on the environment				
	Option 1) Higher urban densification / no GB release = 18,613 homes	Option 2) Urban densification / GB release = 18,937 homes	Option 3) Higher urban densification / GB release = 21,378 homes	Option 4) Higher urban densification / higher GB release = 23,106 homes
Rank			3	4
Significant effects?	No			
Discussion	<p>The recently completed Transport Study (2017) examines the cumulative effects that would result from development of the Council's preferred sites, i.e. the sites that comprise Options 1, 2 and 3. The Study includes a 'quantitative assessment', which identifies junctions and links (i.e. stretches of road) that would experience increased traffic in 2031 were the Pre-submission Plan to be implemented (albeit a worst case scenario is assumed – see para 2.5.10, above); and also a 'qualitative assessment', which involves assessing sites in terms of: access to a highway; PTAL; proximity to a local centre; proximity to pedestrian networks; proximity to existing cycle networks; proximity to the bus network; and proximity to train services.</p> <p>The study does serve to highlight some variation in performance between the four larger Green Belt sites (Oakfield, King George / Goodmayes Hospitals, Ford Sports Ground and Billet Road) with Billet Road shown to perform relatively poorly; however, it is important to caveat the study's findings, in that it assumes: no mitigation will be put in place (e.g. upgrades to roads and junctions, public transport and walking/cycling infrastructure); and limited 'trip internalisation' (e.g. trip avoidance due to a secondary school on-site).</p> <p>It is difficult to draw upon the Transport Study to reach a conclusion that higher urban</p>			

densification should not be supported, from a ‘traffic’ perspective; however, there certainly would be challenges at specific junctions, and along specific road links. Under the scenario tested through the Transport Study, which would involve restrained urban densification (i.e. the Option 2 approach), three junctions along the A118 High Road are predicted a 20% + increase in traffic.

As for the four smaller Green Belt sites (i.e. the omission sites), it is not possible to draw upon the Transport Study; however, it is fair to conclude that there would be a high incidence of car dependency amongst residents, and these sites in combination would contribute significantly to traffic in the west of the borough (all four sites being associated with the Roding Valley area).

In **conclusion**, it does seem that traffic is an issue locally, and hence lower growth is potentially to be supported from this perspective. It is not possible to conclude significant effects, however, given good potential for mitigation.

Reduce contributions to climate change and reduce vulnerability to climate change

	Option 1) Higher urban densification / no GB release = 18,613 homes	Option 2) Urban densification / GB release = 18,937 homes	Option 3) Higher urban densification / GB release = 21,378 homes	Option 4) Higher urban densification / higher GB release = 23,106 homes
Rank	2	2	1 	2
Significant effects?	No			

Discussion

With regards to climate change mitigation, it is appropriate to focus here on the matter of reducing greenhouse gas emissions from the built environment. A primary consideration is the need to support sites that could deliver, or be linked to, a decentralised energy / district heating scheme. 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, the main point to note is that the King George/Goodmayes Hospitals and Ford Sports Ground sites are both associated with an area of flood risk, along the Seven Kings Water. This could be a constraint; however, equally it should still be possible to avoid vulnerable uses in the flood risk zone and/or mitigate risk through design. Both sites have passed the Sequential Test on the basis that initial masterplanning work has served to demonstrate that built development can be directed to the part of the site that falls within Flood Zone 1 (i.e. low flood risk).

In **conclusion**, higher density development in Ilford Town Centre is supported, as is development of the King George/Goodmayes Hospitals site. Development of the smaller Green Belt sites is not supported, as there would be no opportunities for decentralised energy / district heating. Significant effects are not predicted, given that climate change is a global issue / local actions can only have a limited effect.

Minimise the production of waste and encourage recycling




	Option 1) Higher urban densification / no GB release = 18,613 homes	Option 2) Urban densification / GB release = 18,937 homes	Option 3) Higher urban densification / GB release = 21,378 homes	Option 4) Higher urban densification / higher GB release = 23,106 homes
Rank	=	=	=	=
Significant effects?	No			
Discussion	This objective is not applicable to the current appraisal. It should be possible to manage waste sustainably under any of the scenarios as per policy LP24 in the Local Plan.			

Encourage sustained economic growth

	Option 1) Higher urban densification / no GB release = 18,613 homes	Option 2) Urban densification / GB release = 18,937 homes	Option 3) Higher urban densification / GB release = 21,378 homes	Option 4) Higher urban densification / higher GB release = 23,106 homes
Rank	4	3	2	
Significant effects?	No			
Discussion	<p>The following quote from the Redbridge Local Economic Assessment (LEA, 2016) serves to indicate that higher housing growth would be welcomed, from an economic perspective:</p> <p><i>“There is no such thing as a self-contained “Redbridge economy”. Along with the other outer northeast London boroughs, Redbridge does not have a self-contained labour market or discrete local economy. It is heavily integrated into the wider London economy and in particular helps provide a skilled labour force to inner and central London boroughs...”</i> [emphasis added]</p> <p>It is difficult to draw on the LEA to inform consideration of spatial growth options; however, it is notable that the LEA does advocate: <i>“Harnessing growth and achieving sustainable patterns of development by focussing new development in the Investment and Growth Areas.”</i> [emphasis added] The LEA also recognises that delivering ‘sustainable communities’ – with good access to transport and community infrastructure – is important from an economic perspective. Priorities identified include: providing children with the best possible education to maximise participation in the knowledge economy; and providing employees with efficient transport to workplaces. The LEA goes on to state: <i>“Locating new buildings near public transport hubs is essential in encouraging use of sustainable means of travel, reducing emissions from private vehicles and reducing congestion. The Crossrail Corridor is an opportunity area for new development and the proximity to the fast-rail link should encourage greater use of public transport.”</i></p> <p>These considerations serve to suggest that higher urban densification is to be supported, and also serve to highlight certain Green Belt sites as performing better than others.</p> <p>In conclusion, higher housing growth is supported, from an economic growth perspective, although there is some uncertainty, recognising that higher growth could impact on the image of Redbridge as an attractive residential location. It is not clear that there would be significant effects, recognising that economic benefits would be relatively indirect.</p>			

Improve <u>incomes</u> and living standards				
	Option 1) Higher urban densification / no GB release = 18,613 homes	Option 2) Urban densification / GB release = 18,937 homes	Option 3) Higher urban densification / GB release = 21,378 homes	Option 4) Higher urban densification / higher GB release = 23,106 homes
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 it is not possible to differentiate between the alternatives in respect of job creation.</p> <p>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> <p>In conclusion, the alternatives perform on a par, and significant effects are not predicted.</p>			

Enhance the image of the area as a <u>business</u> location				
	Option 1) Higher urban densification / no GB release = 18,613 homes	Option 2) Urban densification / GB release = 18,937 homes	Option 3) Higher urban densification / GB release = 21,378 homes	Option 4) Higher urban densification / higher GB release = 23,106 homes
Rank	=	=	=	=
Significant effects?	No			
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. However, effects would be minor. In conclusion, the alternatives perform on a par, and significant effects are not predicted.</p>			

Provide a high quality, reliable <u>transport network</u> to support the development of the Borough				
	Option 1) Higher urban densification / no GB release = 18,613 homes	Option 2) Urban densification / GB release = 18,937 homes	Option 3) Higher urban densification / GB release = 21,378 homes	Option 4) Higher urban densification / higher GB release = 23,106 homes
Rank				4
Significant effects?	No			
Discussion	<p>The potential to support walking, cycling and use of public transport is discussed above, under the 'Services' and 'Traffic' headings. Focusing on the matter of development supporting upgrades to the local transport network, there are relatively few points to note.</p> <p>The King George/Goodmayes Hospitals & the Ford Sports Ground sites are associated with opportunities to improve walking/cycling links; however, much will depend on the outcomes of masterplanning work (and it is noted that there are several land-owners). Also, the possibility has been raised that development of the King George/Goodmayes Hospitals & the Ford Sports Ground sites could support a new bus route linking the Barley Lane side of King George/Goodmayes Hospital site with Aldborough Road South; however, it is not clear the extent to which this would involve a strategic new link, benefiting existing communities.</p> <p>Finally, with regards to Oakfield, whilst the location of this site will enable new residents to walk/cycle and access public transport, it is worth noting that the 'Transport Evidence' study (2017) does highlight that development of this site, along with other sites in the Hainault and Fairlop area, could stretch the capacity of bus services.</p> <p>In conclusion, there is a need to focus housing growth within the Investment and Growth Areas, with a view to achieving a critical mass that in turn enables transport infrastructure upgrades. This is set to be the case more so under Options 1, 2 and 3, than under Option 4. Significant effects are not predicted, with it not being the case that development is set to deliver or facilitate strategic upgrades to the transport infrastructure.</p>			

Conclusions

	Option 1) Higher urban densification / no GB release = 18,613 homes	Option 2) Urban densification / GB release = 18,937 homes	Option 3) Higher urban densification / GB release = 21,378 homes	Option 4) Higher urban densification / higher GB release = 23,106 homes
Poverty	4	★1	2	3
Crime	=	=	=	=
Housing	4	3	2	★1
Education	4	★1	2	3
Services	4	★1	2	3
Healthy lifestyles	=	=	=	=
Landscapes/ townscapes	2	★1	2	4
Biodiversity	★1	★1	★1	4
Traffic	★1	★1	3	4
Climate change	2	2	★1	2
Waste	=	=	=	=
Economic growth	4	3	2	★1
Incomes	=	=	=	=
Business	=	=	=	=
Transport	★1	★1	★1	4

In **conclusion**, the appraisal finds **Option 2** to perform well in terms of the greatest number of objectives; however, this options performs less well – relative to the two higher growth options - in respect of housing and economic growth. **Option 3** also performs quite well, with no significant negative effects predicted; however, higher urban densification would have implications for townscape/character, and also access to services/facilities. Options 1 and 4 are the more extreme options, and this is reflected in the appraisal. **Option 1** would result in significant negative effects in terms of ‘education’ as nil Green Belt release would result in a shortfall in secondary school provision; however, lower growth in Redbridge is potentially to be supported from a ‘biodiversity’ and ‘traffic’ perspective. **Option 4** is a high growth option that would result in significant negative effects in terms of ‘landscape/townscape’; however, higher growth is potentially to be supported from a ‘housing’ and ‘economic growth’ perspective (albeit there is uncertainty, e.g. given traffic).

4 WHAT ARE THE NEXT STEPS?

- 4.1.1 As explained above (para 1.2.3), the aim of this Interim SA Report is to present an appraisal of spatial strategy alternatives, with a view to informing the Local Plan Examination.
- 4.1.2 The Local Plan Examination will involve a Public Hearings, at which time there will be the potential to discuss the Local Plan spatial strategy, informed by this Interim SA Report, the SA Report (2016; see discussion above, at para 1.2.4), and other evidence. There will also be the potential to make written representations, guided by the 'Matters, Issues and Questions' raised by the Inspector tasked with presiding over the Examination.
- 4.1.3 Subsequent to Examination Hearings, the Inspector will determine whether the plan is sound, or requires modifications. Once found to be 'sound' the plan will be adopted by the Council.

APPENDIX I – SITE OPTIONS APPRAISAL

Introduction

As discussed within Section 2.5 above, in late 2016 / early 2017 the decision was taken to supplement the evidence-base by subjecting certain Green Belt site options to appraisal in isolation, against the SA framework. This appendix presents the appraisal findings.

Specifically, this appendix presents appraisal findings in relation to the following eight site options –

Site	Green Belt parcel	Proposal
South of Bancroft Rugby Football Club	GB08 Ray Park	350 homes
St Swythin's Farm	GB11 Roding Hospital	118 homes
South of Roding Spire Hospital	GB11 Roding Hospital	60 homes
Guide Dogs for the Blind	GB12 Claybury Hospital	200 homes
Oakfield	GB13 Hainault Fields	600 homes mixed use
South of Billet Road	GB14 Fairlop Plain	800 homes mixed use
King George/Goodmayes Hospitals	GB16 King George / Goodmayes Hospitals	500 homes mixed use
Ford Sports Ground	GB16 King George / Goodmayes Hospitals	850 homes mixed use

Methodology

The appraisal table below deals with each of the SA topics established through SA Scoping (see Table 1.1) in turn, with a row of the table assigned to each. Within each row / under each topic, the eight site options are discussed as necessary. The aim of each appraisal narrative is to distinguish between the merits of the competing options. Under some headings only certain sites are discussed, the implication being that other sites do not give rise to any particular issue/opportunity.

Evidence-base

Presented below is a selection of the data-sets referenced within the appraisal text. N.B. Figures A-C are sourced from the Redbridge Characterisation Study (2014).

Independent review by LUC

LUC has undertaken a review of the information presented in this appendix (i.e. Appendix 1 of the London Borough of Redbridge 'Interim SA Report focused on spatial strategy alternatives' prepared by AECOM). The review considered the factual accuracy of the statements contained in this appendix specifically relating to Billet Road. It did not consider the judgments on the performance of the site nor the wider Options considered earlier in the report. No additional research was undertaken in order to confirm the information as there was insufficient time however, AECOM were requested to provide supporting information for statements made specifically in relation to Billet Road. In this regard, LUC were able to conclude that: *"there is no reason to think that the information contained within Appendix 1 is inaccurate."*

Figure A: Redbridge character areas and the capacity of each to accommodate change

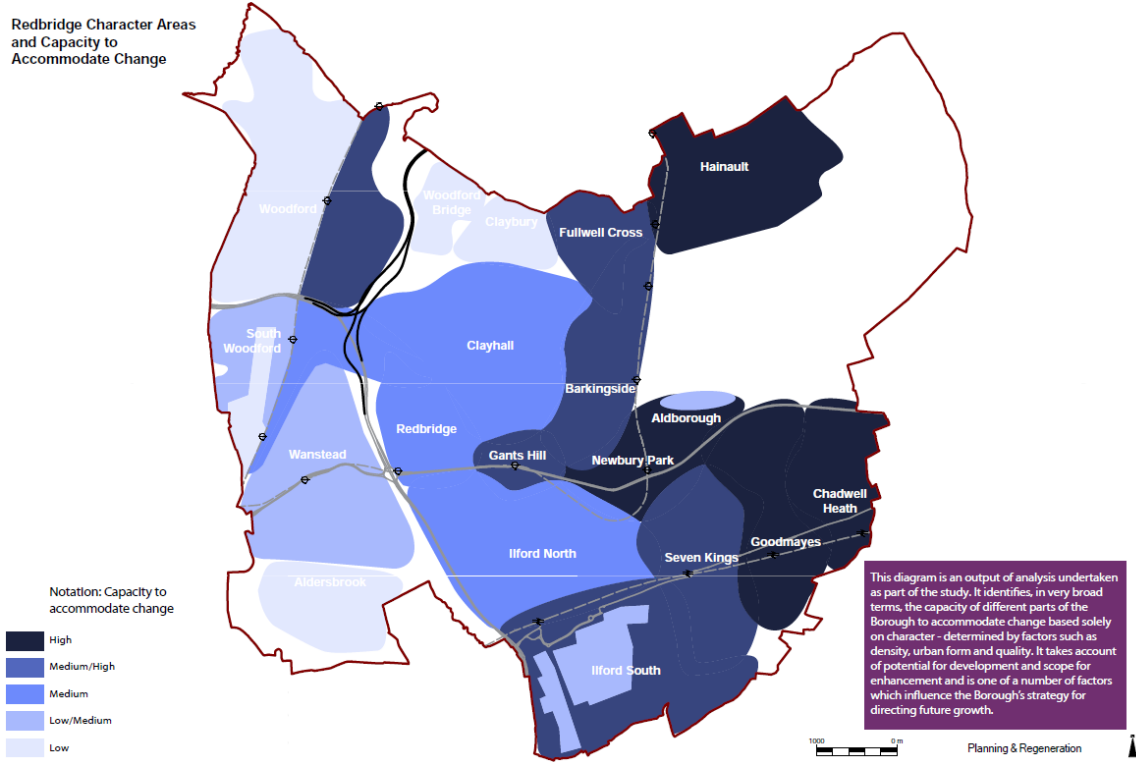


Figure B: Principle and secondary corridors within Redbridge

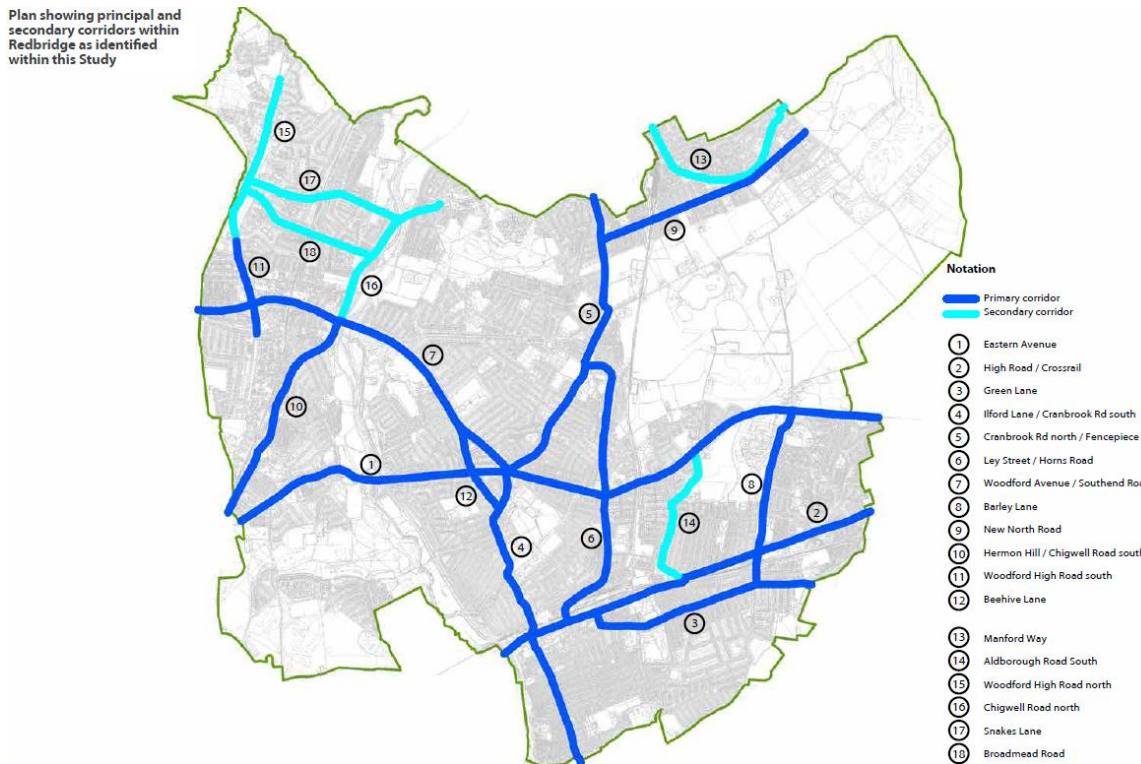


Figure B: Public Transport Accessibility Levels (PTAL) within Redbridge

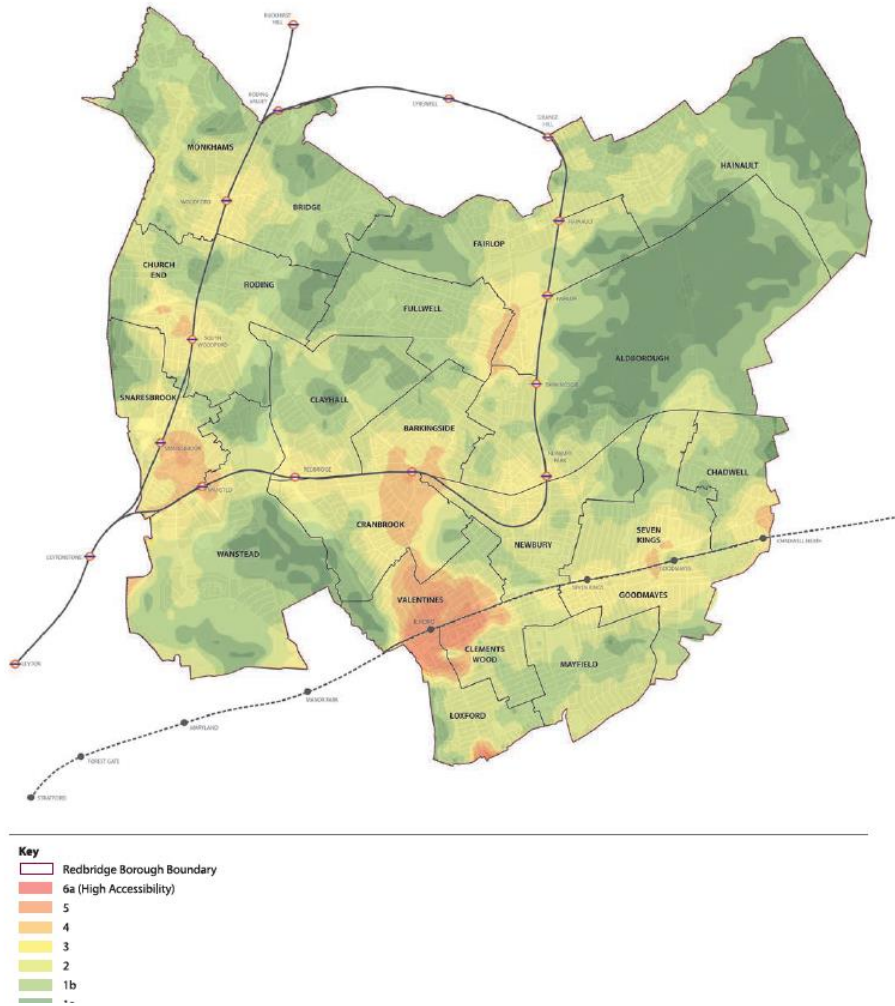


Table A: Select site specific conclusions from the Transport Evidence report (2017)

Site	Access to Existing Highway	PTAL	Proximity to Local Centre	Proximity to Existing Pedestrian Networks	Proximity to Existing Cycle Networks	Proximity to Existing Bus Network	Proximity to Existing Train Services
Oakfield	G	A	A	A	G	G	G
Ford Sports Ground	G	R	R	G	A	G	A
King George/Goodmayes Hospitals	R	A	R	A	G	G	R
Billet Road	G	R	R	G	A	G	R

Site options appraisal findings

Topic	Discussion
Poverty	<p>Billet Road performs well given its location adjacent to the Marks Gate Estate, in neighbouring LB Barking and Dagenham, and recognising that the scheme would be expected to deliver a secondary school, health facility and community hub (see further discussion, below). Marks Gate is an identified regeneration priority area, with a cluster of development sites allocated by the Barking and Dagenham Site Specific Allocations Plan (2010) under the banner of 'Marks Gate Regeneration Sites'. The lower super output area (LSOA) adjacent to the Billet Road site is the tenth most deprived in LB Barking and Dagenham, according to the Indices of Multiple Deprivation (2015) dataset, out of 110 LSOAs in the Borough. LB Barking and Dagenham is supportive of Billet Road's allocation, although notes that phasing will need to take account of the phasing of community infrastructure delivery in the Marks Gate area.</p> <p>The other options 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 or social exclusion. None of the sites would directly contribute to 'regeneration' objectives, recognising that they are remote from Ilford – the Borough's only Metropolitan Centre, and priority for regeneration. Oakfield, George/Goodmayes Hospitals and Ford Sports Ground are all large sites within established Investment and Growth Areas, but it is not clear that development at any of these sites will lead to 'poverty' benefits.</p>
Crime	<p>The options perform on a par. Whilst certain options are may be better suited to the delivery of a high quality and legible urban realm, it is not clear that there will be implications for crime.</p>
Housing	<p>It is difficult to differentiate the options, with it not being appropriate simply to conclude that larger sites are preferable, albeit it is recognised that available and achievable development sites in Redbridge are a fairly scarce resource.</p> <p>The rate of housing delivery is another consideration, with there being a need to identify sites capable of delivering housing early in the plan period. In this respect, it is notable that the four smaller sites are all in single land ownership, which indicates good deliverability. As for the larger sites, the Pre-submission Plan identifies the King George/Goodmayes Hospitals site as the only one with the potential for delivery in phase one of the plan period.</p> <p>All sites will be expected to deliver at least 30% affordable housing, although viability may have a bearing on delivery in practice. In this respect, it is important to note the expectation that the four larger sites would each deliver a new school, and also that there will be other development costs to account for. In particular, it is noted that development of the King George/Goodmayes Hospitals site would necessitate careful consideration given to the integration of heritage, biodiversity, TPOs and asbestos, which could prove costly.</p> <p>A final consideration relates to the provision of Gypsies and Traveller pitches; however, there is no potential to differentiate the sites, as none are likely to deliver new pitches.</p>
Education	<p>The four larger sites – i.e. Oakfield, Billet Road, King George/Goodmayes Hospitals and Ford Sports Ground - stand out as performing well, as each is expected – by the Council - to deliver a new secondary school, albeit there cannot be complete certainty at this stage, with representations received by site promoters questioning this expectation.</p> <p>None of the four smaller sites – i.e. the four omission sites - would deliver a school; hence development would increase pressure on existing schools, including in the west of the borough where there are limited or no sites capable of delivering a new school.</p>
Services	<p>Oakfield performs well given its proximity to existing services and facilities (excellent access to Barkingside District Centre, Fairlop Underground Station, leisure facilities, and open space at Fairlop Country Park); given potential to deliver a new secondary school, a health facility and a community hub; and also given potential to support the Council's ambitions to develop Barkingside as a District Centre. Also, the existing Redbridge Sports Centre is an important local facility and redevelopment offers the potential to improve and enhance it to create a sub regionally important facility. There are concerns in respect of re-providing for lost sports pitches such that there is no net loss in the quality of provision (see representation received</p>

Topic	Discussion
	<p>from the ‘Save Oakfield Society’ at para 2.4.14, above); however, the Council’s Playing Pitch Feasibility Study (2017) demonstrates that there is scope to re-provide pitches and facilities at Hainault and Forest Road Recreation Grounds.</p> <p>The King George/Goodmayes Hospitals site and adjacent Ford Sports Ground site are distant from a District Centre, although Goodmayes Local Centre is within walking distance to the south, as is the wider Crossrail Corridor Investment and Growth Area. Both schemes would also be expected to deliver a new secondary school, a health facility and a community hub. Also, there is the potential to increase permeability through the sites, thereby benefiting existing residents of surrounding areas, albeit work on masterplanning is at an early stage and there is a need to work with several land-owners. In relation to the Ford Sports Ground, the existing playing pitches would be re-provided at Goodmayes Park Extension, in accordance with policy LP35 of the Local Plan.</p> <p>Billet Road would also be expected to deliver a new secondary school, health facility and a community hub; however, the site is less well linked to the Crossrail Corridor than the sites discussed above, and distant from a District Centre. The site is well linked by road, given its location adjacent to the A12, although there are some concerns regarding traffic (see discussion below).</p> <p>The four smaller sites perform similarly. Points to note are as follows –</p> <ul style="list-style-type: none"> • Land south of Bancroft Rugby Football Club is in close proximity (c.0.5 miles) to both Woodford and Roding Valley Central Line stations, but is some way distant from a District Centre, the nearest being South Woodford. This site is adjacent to the M11, but some way from a junction and generally not very well connected to the strategic road network. • The Guide Dogs for the Blind site is located at the Borough’s northern extent, and is remote from any District Centre or underground station. However, the site is relatively well linked to the strategic road network, with the nearby A113 connecting south to South Woodford, and north to M11 J5. This is also a bus corridor, with routes connecting to a number of locations, every 10 minutes in peak hours. • St. Swythin’s Farm and Land south of the Spire Roding Hospital are in close proximity. They lie not far to the east of South Woodford District Centre, but are not well linked given the intervening M11 corridor. Links to Redbridge District Line Station, to the south, are better. The sites lie on the edge of the South Woodford Investment and Growth Area (Land south of the Spire Hospital is just outside), and in close proximity to a Strategic Industrial Location (SIL, one of only two in the Borough). The Redbridge Recreation Ground is also in close proximity.
Healthy lifestyles	<p>Issues discussed above, under the ‘services’ heading, are also relevant here, given determinants of health. Another important consideration is access to open space and sports/recreational facilities.</p> <p>Billet Road falls within an area of open space deficiency (see Figure 24 of the Pre-submission Plan), hence new open space provided as part of the development (all developments would be expected to provide open space) would be welcomed.</p> <p>Oakfield also performs well, given its location adjacent to Fairlop Country Park, and given potential to deliver upgrades to Redbridge Sports Centre. There are concerns in respect of re-providing for lost sports pitches such that there is no net loss in the quality of provision (see representation received from the ‘Save Oakfield Society’ at para 2.4.14, above); however, the Council’s Playing Pitch Feasibility Study (2017) demonstrates that there is scope to re-provide pitches and facilities at Hainault and Forest Road Recreation Grounds.</p> <p>Four sites that perform similarly are</p> <ul style="list-style-type: none"> • King George/Goodmayes Hospitals – adjacent to Seven Kings Park, and would deliver new open space. • Ford Sports Ground – adjacent to Seven Kings Park, and would deliver new open space. • St. Swythin’s Farm – adjacent to Redbridge Recreation Ground, and would deliver new open space.

Topic	Discussion
	<ul style="list-style-type: none"> • Guide Dogs for the Blind adjacent to Claybury, and would deliver some new open space. <p>Land south of Bancroft Rugby Football Club is currently used as school sports pitches. The Playing Pitches Strategy (June 2016) establishes a need to “<i>retain all current existing playing field provision</i>”. However, the pitches are not available for community use, and the school can demonstrate that the facilities can be provided elsewhere.</p> <p>Land south of the Spire Roding Hospital performs poorly as it is understood to fulfil a role as locally important open space, although it is private land and not managed as amenity space. However, proposals submitted for the site show a green buffer along the western edge of the site, along the River Roding, which would be managed as accessible open space.</p> <p>Finally, it is necessary to comment on <u>air quality</u>. In this respect it is difficult to differentiate the site options, with all sites falling within the Redbridge borough-wide AQMA (declared for annual mean NO2 and PM10 24 hour exceedances) and detailed studies only having been completed for three of the sites. Specifically, a report was prepared in 2015, as part of a High Level Transport Study, examining Oakfield, King George/Goodmayes Hospitals and Ford Sports Ground. It concluded: “<i>Road transport emissions are the primary source of air pollutant emissions in the vicinity of [the] sites... There may be an effect on local air quality in the area surrounding the Development Sites. Air quality sensitive receptors in the surrounding area include residential properties and schools. There are no relevant ecological receptors. [However] results of the assessment of the operational phase of the Development Sites indicate that there is not likely to be a significant adverse effect on local air quality at existing air quality sensitive receptors and that the introduction of new air quality sensitive receptors associated with the Development Sites in 2030 is unlikely to result in exposure to pollutant concentrations in excess of relevant AQS objective and EU limit value thresholds. Specific mitigation measures to control emissions associated with the operational development are considered not to be required.</i>”</p>
Landscapes/ townscapes	<p>N.B. The conclusions from the Green Belt Review are quoted within this section, in the absence of a study dealing specifically with landscape sensitivity/capacity.</p> <p>Of the four larger sites, it is potentially Oakfield that stands out as performing well. The Green Belt Review (2017) is unequivocal, stating that the site “<i>does not meet any of the NPPF Green Belt purposes. The site does not check unrestricted sprawl of large built-up areas as it is surrounded by development to the north, west and south nor does it prevent neighbouring settlements merging into one another as adjacent development is part of Ilford/Barkingside/Grange Hill. The site solely comprises sports/playing fields with associated buildings and extensive car parking. The existing sports centre is very prominent and affects the openness of GB13b. In addition, the site’s connection to the wider Green Belt is prevented by the presence of the railway on embankment to the east which forms a strong, well defined boundary consistent with paragraph 85 of the NPPF. The site is thus totally enclosed by development and is not connected to land which could be interpreted as “Countryside”.</i></p> <p>It is difficult to differentiate the other large sites. All are located in the eastern part of the Borough, which has been identified by the Redbridge Characterisation Study (2014; see Figure A above) as having relatively high capacity for development. However, all are associated with certain issues. At the King George/Goodmayes Hospital site there is a need to take careful account of established design / urban realm objectives, and also heritage conservation objectives given the locally listed Goodmayes Hospital buildings and adjacent Little Heath Conservation Area. As for Billet Road, it seems that there may be a degree of connection with the wider Fairlop Plain to the north, with the Green Belt Review (2017) stating: “<i>The site is physically connected to the wider Green Belt parcel of GB14 to the north, however the visual connection is reduced by the presence of Hainault House stables, Red House Farm and development further to the west along Billet Road.</i>” However, it is not clear whether this translates into a ‘landscape’ sensitivity.</p> <p>As for the four smaller sites, the first point to note is that St. Swythin’s Farm stands out as performing well, given that it is a relatively small site that has been identified by the Green Belt Review as not contributing to Green Belt purposes. The remaining three sites are all found, by the Green Belt Review (2017), to contribute to the purposes of the Green Belt.</p>

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	<p>Other points are as follows –</p> <ul style="list-style-type: none"> • Land south of Bancroft Rugby Football Club (350 homes) is adjacent to the west of Ray Park, which contains the Grade II listed garden walls at Ray House, and the locally listed Ray House, and the Green Belt Review establishes that the site is ‘physically contiguous’ with other parts of the Green Belt Parcel (Parcel 8), including Ray Park; however, this part of Woodford is identified by the Characterisation Study (see Figure A, above) as having relatively high capacity to accept development. • The Guide Dogs for the Blind site (200 homes) lies adjacent to the Claybury Conservation Area, and Woodford Bridge Conservation Area is located a short distance to the west. • Land south of the Roding Spire Hospital (60 homes) is considerably smaller; however, this site is understood to fulfil a role as locally important open space, although it is private land and not managed as amenity space. The emerging masterplan shows a considerable green buffer along the western edge of the site, along the River Roding, which would be managed as publicly accessible open space.
Biodiversity	<p>It is possible to place the sites in an order of preference –</p> <ul style="list-style-type: none"> • Five of the eight sites perform relatively well, in that they are not subject to strategic biodiversity constraints. • The Ford Sports Ground is sensitive given Seven Kings Water, which runs along the western edge of the site. The river is designated Site of Importance for Nature Conservation (SINC), with potential for enhancement through deculverting and restoration. • The King George/Goodmayes Hospitals site is constrained, given that a significant part of the site periphery is designated a SINC. There is a blanket Tree Preservation Order (TPO) covering the majority of the trees on the site. • Land south of the Spire Roding Hospital comprises a grazed field to the north east with the remainder of the site comprising semi-natural woodland and scrub which is denser to the south and to the west of the site. The whole site is a SINC.
Traffic	<p>The recently completed Transport Study (2017) examines the four larger sites – i.e. those proposed for allocation by the Pre-submission Plan. The Study includes a ‘quantitative assessment’, which identifies junctions and links (i.e. stretches of road) that would experience increased traffic in 2030 were the Pre-submission Plan to be implemented (albeit a worst case scenario is assumed – see para 2.5.10, above); and also a ‘qualitative assessment’, which involves assessing sites in terms of: access to a highway; PTAL; proximity to a local centre; proximity to pedestrian networks; proximity to existing cycle networks; proximity to the bus network; and proximity to train services (see Table A, above).</p> <p>Having made these initial points, it is possible to place the four larger sites in an order of preference –</p> <ul style="list-style-type: none"> • Oakfield – performs well given its proximity to existing services and facilities (excellent access to Barkingside District Centre, Fairlop Underground Station, leisure facilities, and open space at Fairlop Country Park), and given good bus connections. The site is shown to perform best, out of the four sites, through the ‘qualitative assessment, with it performing notably best in terms of access to an existing centre and access to a tube station. Also, the quantitative assessment does not serve to suggest that this site will have an undue effect on traffic, with no issues identified for the Fullwell Cross Roundabout, and the Gants Hill Roundabout predicted an increase in traffic of c.12-19% (worst case scenario). • The King George/Goodmayes Hospitals & the Ford Sports Ground sites perform less well, 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. The ‘qualitative assessment’ shows the King George/Goodmayes Hospitals site to perform slightly worse than the Ford Sports Ground site, and indeed worst of all the site options, scoring a ‘red’ in terms of access to existing highway, proximity to a local centre

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	<p>and proximity to existing train services. It is difficult to draw any conclusions from the ‘quantitative assessment’ for this site specifically.</p> <ul style="list-style-type: none"> • Billet Road performs relatively poorly. In particular, the ‘quantitative assessment’ serves to highlight concerns, with Billet Road predicted a large increase in traffic (25% in the AM peak), Barley Lane predicted a large increase in traffic (43.4% in the PM peak; presumably due to Billet Road impacting in combination with the King George/Goodmayes Hospitals site, plus other allocations) and also the Little Heath Roundabout (A12/Hainault Rd/Barley Ln) predicted an increase (22.2% in the AM peak). It is important to emphasise once more though that the predictions made as part of the quantitative assessment are ‘worst case scenario’ figures. As discussed at para 2.5.10, above, they assume ‘unconstrained demand’ and do not account for mitigation. <p>As discussed above, under the ‘Services’ heading, the four smaller sites are less well linked. It is not possible to draw further on the cumulative assessment presented within the Transport Evidence report to inform the assessment of these sites specifically.</p>
Climate change	<p>With regards to climate change mitigation, it is appropriate to focus here on the matter of reducing greenhouse gas emissions from the built environment. A primary consideration is the need to support sites that could deliver, or be linked to, a decentralised energy / district heating scheme. 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. As such, it is possible to conclude that the King George/Goodmayes Hospitals site performs well, as does the adjacent Ford Sports Ground site, on the assumption that the two sites might be masterplanned in conjunction. However, there is some uncertainty in this respect, given representations received from the site promoters, questioning the justification for requiring a decentralised energy network, and suggesting that the cost implications could affect development viability.</p> <p>With regards to climate change adaptation, the main point to note is that the King George/Goodmayes Hospitals and Ford Sports Ground sites are both associated with an area of flood risk, along the Seven Kings Water. This could be a constraint; however, equally it should still be possible to avoid vulnerable uses in the flood risk zone and/or mitigate risk through design. Both sites have passed the Sequential Test on the basis that initial masterplanning work has served to demonstrate that built development can be directed to the part of the site that falls within Flood Zone 1 (i.e. low flood risk).</p> <p>Flood risk is also a consideration at Land south of the Spire Roding Hospital. The site lies almost adjacent to the River Roding, but does not intersect the flood risk zone on account of an intervening embankment.</p>
Waste	<p>This objective is not applicable to the current appraisal. It should be possible to manage waste sustainably at any of the development site options in question as per Policy LP24.</p>
Economic growth	<p>The following quote from the Redbridge Local Economic Assessment (LEA, 2016) serves to indicate that development at any of the sites would be welcomed, from an economic perspective, on the basis that new homes are needed:</p> <p><i>“There is no such thing as a self-contained “Redbridge economy”. Along with the other outer northeast London boroughs, Redbridge does not have a self-contained labour market or discrete local economy. It is heavily integrated into the wider London economy and in particular helps provide a skilled labour force to inner and central London boroughs...”</i></p> <p>The LEA also recognises that delivering ‘sustainable communities’ – with good access to transport and community infrastructure – is important from an economic perspective. Priorities identified include: providing children with the best possible education to maximise participation in the knowledge economy; and providing employees with efficient transport to</p>

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	<p>workplaces. The LEA goes on to state: <i>“Locating new buildings near public transport hubs is essential in encouraging use of sustainable means of travel, reducing emissions from private vehicles and reducing congestion. The Crossrail Corridor is an opportunity area for new development and the proximity to the fast-rail link should encourage greater use of public transport.”</i></p> <p>These considerations serve to suggest that the sites falling within the Investment and Growth Areas perform well, and Oakfield in particular performs well given excellent access to a tube station. Also, Oakfield’s proximity to Barkingside District Centre means that development may be supportive of another LEA objective: <i>“Encouraging and maintaining an appropriate mix of town centre uses.”</i></p> <p>There could also be benefits should it be the case that development serves to increase north-south links/permeability, given the following LEA finding: <i>“Public transport links within the Borough, particularly North to South, could be improved to encourage a reduction in private vehicle use and carbon emissions. Greater North-South links would also encourage greater economic development in the North of the Borough as well as increasing local employment opportunities.”</i></p> <p>In this respect, it is noted that development of the King George/Goodmayes Hospitals should serve to increase permeability through the site, and also that there may be the potential for development of this site, in combination with Billet Road, to support a new bus route (see further discussion below, under ‘Transport’).</p> <p>Of the four smaller sites, only one falls within an Investment and Growth Area – St. Swythin’s Farm. This is an important consideration given that the LEA advocates: <i>“Harnessing growth and achieving sustainable patterns of development by focusing new development in the Borough’s Investment and Growth Areas.”</i></p> <p>However, it is perhaps worth noting that these sites do fall within the ‘London to Standard Corridor’;⁸ with one of them – Guide Dogs for the Blind – being well linked by road.</p> <p>Finally, it is noted that Land south of the Spire Roding Hospital lies just outside the South Woodford Investment and Growth Area, and is almost adjacent to a SIL.</p>
Incomes	<p>There is little potential to differentiate the site options, recognising that regeneration initiatives (notably Ilford town centre) will generally be unaffected by growth at any of the locations under consideration. 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>
Business (image of the borough)	<p>High quality new housing will contribute to the image of the Borough as a business location. There are some established opportunities – perhaps most notably at the King George/Goodmayes Hospitals site - however, any effects would be very marginal.</p>
Transport	<p>The potential to support walking, cycling and use of public transport is discussed above, under the ‘Services’ and ‘Traffic’ headings.</p> <p>Focusing on the matter of development supporting upgrades to the local transport network, there are relatively few points to note. King George/Goodmayes Hospitals & the Ford Sports Ground sites are associated with opportunities to improve walking/cycling links; however, much will depend on the outcomes of masterplanning work (and it is noted that there are several land-owners). Also, the possibility has been raised that development of the King George/Goodmayes Hospitals & the Ford Sports Ground sites could support a new bus route linking the Barley Lane side of King George/Goodmayes Hospital site with Aldborough Road South; however, it is not clear the extent to which this would involve a strategic new link, benefiting existing communities. Finally, with regards to Oakfield, whilst the location of</p>

⁸ The London-Stansted-Cambridge Corridor is a strategic partnership of public and private organisations covering the area north from the Royal Docks, up through the Lee Valley, to Stevenage, Harlow and Stansted, and through to Cambridge. This brings together public and private sector organisations which have the common aim of seeking economic growth, higher employment rates, providing places for people and business while preserving the quality and character of the corridor.

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	this site will enable new residents to walk/cycle and access public transport, it is worth noting that the 'Transport Evidence' study (2017) does highlight that development of this site, along with other sites in the Hainault and Fairlop area, could stretch the capacity of bus services.

Conclusions

On the basis of the above discussion, it is not possible to rank the site options, from best to worst, in terms of 'sustainability'. Some sites – perhaps most notably Oakfield – do perform well in terms of numerous sustainability objectives, and perform poorly in terms of relatively few sustainability objectives, but that is not a reason for concluding that any given site performs 'best' or is 'most sustainable'. It may be that a site only has one drawback and numerous benefits, but that one draw-back is judged to weigh heavily 'in the balance'. It is for the plan-makers, rather than SA, to balance competing objectives.

Considering the sites in size order, from largest to smallest, conclusions are as follows –

- Ford Sports Ground (850 homes mixed use) - Distant from a District Centre, although Goodmayes Local Centre is within walking distance to the south (at least from the southern edge; the northern edge being almost 2km distant), which falls within the wider Crossrail Corridor Investment and Growth Area. Expected to deliver a new secondary school, health facility and community hub. The eastern edge is defined by Seven Kings Water, which is associated with an area of flood risk and land designated as locally important for biodiversity. Existing playing pitches and facilities will be re-provided at Goodmayes Park Extension, in accordance with Policy LP35.
- South of Billet Road (800 homes mixed use) - Well linked to the strategic road network, but distant from a District Centre or Local Centre and there are traffic concerns. Expected to deliver a new secondary school, health facility and community hub. Relatively unconstrained, although there is potentially some landscape sensitivity, there are hedgerows on-site, and the A12 is a nearby source of noise/air pollution.
- Oakfield (600 homes mixed use) - Excellent access to Barkingside District Centre, Fairlop underground station, leisure facilities, and open space at Fairlop Country Park. Expected to deliver a new secondary school, health facility and community hub; and redevelopment offers the potential to improve and enhance Redbridge Sports Centre. Existing playing pitches and facilities will be re-provided, in accordance with Policy 35 of the Local Plan. Concerns regarding the quality of re-provision have been expressed; however, the Council's Playing Pitch Feasibility Study (2017) demonstrates scope to re-provide at Hainault and Forest Road Recreation Grounds.
- King George/Goodmayes Hospitals (500 homes mixed use) - Distant from a District Centre, although Goodmayes Local Centre is within walking distance to the south (at least from the southern edge; the northern edge being almost 2km distant), which falls within the wider Crossrail Corridor Investment and Growth Area. Expected to deliver a new secondary school, health facility and community hub. The western edge is defined by Seven Kings Water, which has an associated area of flood risk, and a significant area is designated as locally important for biodiversity. Heritage is another constraint, given extensive locally listed buildings.
- S of Bancroft Rugby Football Club, Woodford (350 homes) - In close proximity (c.0.5 miles) to both Woodford and Roding Valley Central Line stations, and Woodford Local Centre, but distant from a District Centre. The site has been found by GB Review to contribute to the purposes of the GB, and is also constrained from a heritage perspective, given adjacent Ray Park, which contains a locally listed building with an associated walled garden that is nationally listed (Grade II).
- Guide Dogs for the Blind (200 homes) - Distant from a District Centre or underground station, but close to Woodford Bridge Local Centre and relatively well linked to the strategic road network, and bus corridors. The site has been found by GB Review to contribute to the purposes of the GB, and the site is adjacent to Claybury Conservation Area.
- St Swythin's Farm (118 homes) - Not well linked to a District Centre, Local Centre or underground station, but near Strategic Industrial Land (SIL), adjacent to a recreation ground and falling within the South Woodford Investment and Growth Area.
- S of Roding Spire Hospital (60 homes) - Not well linked to a District Centre, Local Centre or underground station, but close to a SIL and a recreation ground. The site has been found by GB Review to contribute to the purposes of the GB, and there are environmental constraints, given that the site is a designated Site of Importance for Nature Conservation (SINC), and the river is adjacent (although a bund prevents flood risk).