Dear Joanne Woodward,

Re: Publication of a Local Plan (Regulation 19) Redbridge Local Plan 2015-2030: Pre-Submission Draft

Thank you for consulting with the London Borough of Waltham Forest on the Pre-Submission Draft of the Redbridge Local Plan. The Council welcomes the opportunity to work collaboratively with your Council to ensure that strategic priorities are coordinated across borough boundaries. With regard to the contents of the above consultation document, it is noted that the coverage of the proposals/policies are locally specific to the London Borough of Redbridge.

We have set out in the paragraphs below, some comments on the Plan which you may wish to consider. Please note that these represent views of officers and are being submitted as critical friend comments to improve the Plan rather than formal objections to the plan.

Delivery Housing Growth

Paragraph 47 of the National Planning Policy Framework (NPPF) requires local planning authorities to use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area. Policy 3.3 ‘Increased housing supply’ of the London Plan states that boroughs should seek to achieve and exceed the relevant minimum borough annual average housing target. These targets should be augmented where possible with extra housing capacity to close the gap between identified housing need and supply in line with the NPPF requirements. Boroughs should identify and seek to enable additional development capacity through intensification, town centre renewal, opportunity, intensification, and growth corridors and sensitive renewal of existing residential areas.

Table 3.1 sets a minimum ten year target of 11,232 and an annual monitoring target of 1,123 between 2015-2025. Policy LP2 states that the Council will deliver a minimum target of 16,845 new dwellings in the period 2015 to 2030. The Outer North East London Strategic Housing Market Assessment identifies Redbridge’s full objectively assessed housing need as 46,900 homes between 2011 and 2033, equating to 31,977 homes for the plan period and 2,132 homes a year. The Plan sets a target of 1,123 homes a year which is based on a thorough assessment of housing capacity with the Strategic Housing Land Availability Assessment and sites identified by the Council identifying a capacity of 18,774 (including an allowance for windfall).

Paragraph 3.8.5 states the Mayor’s SHLAA has considered the potential capacity of a number of locations and that this demonstrates that the borough has sufficient capacity to meet and
exceed its minimum housing target in accordance with the London Plan. Paragraph 3.8.7 recognises that its objectively assessed housing need is far in excess of its identified sources of housing capacity.

Given the objectively assessed need identified in the Strategic Housing Market Assessment and the London Plan requirement for boroughs to exceed their housing targets, we question why you have selected a minimum housing target of 1,123, particularly when sites have been identified as having capacity of 18,774 during the Plan period.

Stimulating Business and the Local Economy

With regard to Policy LP2, paragraph 161 of the NPPF requires local planning authorities to assess the need for land or floor space for economic development over the plan period and assess the existing and future supply of land available for economic development and its sufficiency and suitability to meet the identified needs. The Employment Land Review predicts there will be demand for 17.3ha of B8 floor space to 2031 and 20.0ha to 2036. It is unclear how the Plan will meet these requirements given that uses outside of B1 and B2 will not be supported in the borough’s Strategic Industrial Locations. The Plan should make clear where B8 uses will be supported in order to meet the identified need for additional floor space.

Delivering Community Infrastructure

On Policy LP14, we are supportive of the strategic approach to the retention of existing infrastructure and in planning for new infrastructure. We would welcome the opportunity to continue an open dialogue with you on any cross-borough infrastructure issues, including connecting investments in transport, healthcare, education and open space that have particular cross-borough implications in terms of catchments and access. It will be useful to understand in more detail the projects contained within the Infrastructure Delivery Plan. Some infrastructure areas listed (notably health) have not identified any individual infrastructure projects in this category which may have a catchment area that cover multiple Local Authorities.

Climate Change Mitigation

Paragraph 99 of the NPPF states that the Local Plan should take account of climate change over the longer term. New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change and risks should be managed through suitable adaption measures. While noting the inclusion of policies regarding this, it is apparent that the policy is primarily focused on domestic users. Perhaps reference could be made to the need to encourage business users (as very high energy users) to reduce consumption and retrofit energy efficiency measures and renewables. Also reference is made to CHP under LP20 (3a). We understand that GLA and BEIS are moving away from CHP (especially gas fired) towards more renewable sources. Perhaps you may want to widen the reference to decentralised energy networks and not narrow it down to just CHP.

Also, the use of CHP is not often viable in developments under 300 units, so explicitly stating that it should be considered in all developments over 10 units may be problematic. Perhaps rewording LP20 (3) to refer to communal heating and use of DE networks may be better. Furthermore, mindful of the GLA Housing SPG requirement for Carbon Offset Fund contribution which comes into effect from 1 October 2016, we are wondering whether the words “where appropriate” included in LP20 (3b) is necessary. It may also be helpful to include a calculation of the carbon offset fund as applicable to Redbridge. Under the section on Implementation, reference is made to DEMaP. We think that this is now Energy for London, but you may want to contact Peter North at the GLA Energy Team to clarify this point.
Finally on Policy LP33, we note that references have been made to English Heritage, which should now read as Historic England.

Yours sincerely

Head of Planning Policy & Strategy