

LBR 1.04 - Local Plan Spatial Strategy Topic Paper

1. Introduction

1.1 The population of Redbridge is projected to grow significantly to the period 2030. From a base of 297,000 in 2015, it is anticipated to reach 362,000 by 2030 (GLA short term migration scenario, 2014). The key drivers for this growth are an increased birth rate, increased life expectancy, and changing migration patterns (both national and international).

1.2 The NPPF states that the planning system should be *“genuinely plan led”* and that *“every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth”* (NPPF, para 17).

1.3 A new Local plan is therefore needed that sets out how projected population growth in Redbridge can be managed in a sustainable manner. This topic paper summarises the boroughs development needs, key development constraints and a summary of the rationale behind the Council’s overall spatial strategy for growth as set out in the submission version of the Redbridge Local Plan 2015-2030.

2. Redbridge’s Objectively Assessed Needs

2.1 As paragraph 14 of the NPPF states, *“at the heart of the National Planning Policy Framework is a presumption in favour of sustainable development.....For plan making this means that:*

- *local planning authorities should positively seek opportunities to meet the development needs of their area;*
- *Local Plans should meet objectively assessed needs... unless:*
 - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or*
 - *specific policies in this Framework indicate development should be restricted.”*

2.2 The population growth projected in paragraph 1.1 above will generate significant development needs in the borough, as summarised below.

Housing Need

2.3 The Council has worked jointly with four neighbouring authorities of Havering, Barking and Dagenham, Newham and Waltham Forest in the production of the Outer North East London Strategic Housing Market Assessment (2016) (SHMA) (LBR 2.01). The SHMA estimated that the

borough's full objectively assessed housing need is 46,900 homes between 2011 and 2033. This equates to 31,977 homes for the plan period, with an average of 2,132 homes per year.

2.4 A two tier planning system still functions in London, unlike the rest of the country. The London Plan forms part of the Council's Development Plan. In relation to housing requirements the London Plan sets a minimum housing target for Redbridge of 1,123 dwellings per annum. Therefore, to meet the requirements of the London Plan, over the plan period, the Council is required to provide a minimum of 16,845 homes.

Retail Requirements

2.5 The Council's Retail Capacity Study 2015 (LBR 2.34) identified that anticipated population growth could sustain between 23,911 – 39, 851 sq.m (net) of comparison retail floorspace, and between 8,562 – 17,071 sq.m (net) of convenience retail floorspace in the borough over the plan period.

Employment Land Requirements

2.6 The Council's Employment Land Review 2015 (LBR 2.33) identified a need to provide a minimum of 21,206 sq. m of new fit for purpose business space that caters for the needs of new and emerging businesses, whilst also protecting well performing established employment areas. It also proposed that the loss of up to approximately 14.45ha of poorer quality employment space should be managed.

Infrastructure provision

2.7 The Infrastructure Delivery Plan (2017) (IDP) (LBR 2.21) identifies the infrastructure needed to deliver planned growth sustainably, effectively and at the right time in Redbridge.

2.8 In particular, the IDP reveals that the high level of education demand required throughout the plan period reflects the high child yield in the borough associated with new development and the pace of population growth. Therefore, delivery of education facilities is essential to ensure that there is sufficient capacity to meet demand. The IDP (2017) estimates that there is a need to provide 10 additional primary school forms of entry and 47 secondary school forms of entry over the lifetime of the plan. In terms of education provision this equates to a need for three additional primary schools and six secondary schools to be built in the borough.

2.9 With regards to health provision the key requirements are broken down by areas of the borough as follows:

- Cranbrook and Loxford – investment in Loxford Polyclinic to enable better utilisation in the early phases of the plan, and provision of a new health hub as part of developments proposed in Ilford town centre;
- Seven Kings – investment into some reconfiguration of Newbury Park Health Centre, provision of a new health centre at Goodmayes, and a new health hub as part of the proposed redevelopment at King George and Goodmayes Hospitals;
- Fairlop – investment in some reconfiguration of Hainault Health Hub, and redevelopment and modernisation of Fullwell Cross Health Centre or provision of a new Locality Hub as part of the proposed Oakfield redevelopment;
- Wanstead and Woodford – redevelopment of Wanstead Hospital as a new locality hub and key worker accommodation, and investment in South Woodford Health Centre to increase capacity.

Conclusion

2.10 The projected population growth in the borough will generate significant development needs, particularly in relation to housing and infrastructure provision.

3. Development ‘Constraints’

3.1 Other NPPF policy objectives significantly constrain the supply of developable land in the borough. The NPPF makes specific reference to the following development constraints of relevance to Redbridge:

- Green Belt;
- Biodiversity and Nature Conservation Designations;
- Open Space;
- Heritage Assets;
- Existing Borough Character; and
- Areas of Flood Risk.

3.2 Each of these is discussed in turn below:

Green Belt

3.3 Currently 2,000ha, or approximately 30% of the borough, is designated as Green Belt, as set out in figure 23 of the Local Plan. Under NPPF policy, the construction of new buildings in such areas is restricted to uses such as agriculture and forestry, facilities for sport and recreation,

and the replacement of existing buildings. Any land designated which remains designated as Green Belt cannot therefore make a significant contribution towards meeting the borough's development needs.

Biodiversity and Nature Conservation Designations

3.4 In addition to Green Belt, the borough contains a series of designated assets of biodiversity and nature conservation value. For example, Epping Forest is designated as a Special Area of Conservation (SAC); Epping Forest, Wanstead Flats and Hainault Forest are all designated as Sites of Scientific Special Interest (SSSI); and the River Roding and Seven Kings Water are designated as Sites of Importance for Nature Conservation (SINC). As set out in NPPF paragraph 117, conserving and enhancing the natural environment is a core planning principle. The significant areas of the borough designated for their biodiversity and nature conservation value therefore cannot make a significant contribution towards meeting the borough's development needs.

Open Space

3.5 In addition to the Green Belt and environmental designations, there are a further 170ha of open spaces in the borough as shown in figure 23 of the Local Plan. Therefore, including Green Belt, over 40% of the borough is open space, including publicly accessible spaces, private land, agricultural land, woodland, playing fields, parks, play areas, allotments and cemeteries. As set out in the NPPF paragraph 74, subject to specific criteria, such areas should not be built on. Any land which continues to be designated as open space therefore cannot make a significant contribution towards meeting the borough's development needs.

Heritage Assets

3.6 Redbridge has a number of heritage assets as set out in figure 21 of the Local Plan. These include: 16 Conservation Areas, over 200 statutorily listed buildings, over 200 locally listed buildings, two Historic Parks and Gardens, and 10 locally designated Residential Precincts.

3.7 Conserving heritage assets is a core planning principle as set out in paragraph 17 of the NPPF. The need for sensitive development around such assets therefore constrains future development opportunities in the borough.

Existing Borough Character

3.8 In addition to designated heritage assets, the built up area of the borough is predominantly of a low density suburban residential character. The Characterisation Study (2014) (LBR 2.75.1.2.3) shows that that approximately 80% of built up areas are residential. Furthermore, 71% forms suburban development, suburban terracing and urban terracing which are generally lower density housing and two to three storeys in height. Only Ilford and Gants Hill have a higher density character. This existing character further constrains development opportunities,

due to the need for new development to, *“respond to local character and history, and reflect the identity of local surroundings and materials”* to secure good design quality in accordance with NPPF paragraph 58.

Flood Risk

3.9 Due to the presence of existing watercourses (including the River Roding and Seven Kings Water), significant portions of the borough fall within flood zones 2 and 3, as shown in figure 18 of the Local Plan.

3.10 Under paragraph 100 of the NPPF inappropriate development, such as housing and social infrastructure, should be avoided in areas of highest flood risk. This places a constraint on where land is available to meet the borough’s development needs.

Conclusion

3.11 This demonstrates that land supply and development capacity in the borough is severely constrained and limits the Council’s ability to meet its full development needs.

4. Overall Development Strategy

4.1 Given the NPPF requirement to meet development needs, in the context of the borough’s development needs (set out in section 2) and existing ‘constraints’ (as set out in section 3) the Council has proposed the following development strategy.

4.2 As set out in LP1 the Council is proposing to direct development to meet the borough development needs to five Investment and Growth Areas of Ilford, Crossrail Corridor, Gants Hill, South Woodford and Barkingside and other town centres outside of these locations. These areas are the most accessible locations in the borough with excellent transport links. In to the south of the borough, particularly in areas of Ilford and the Crossrail Corridor, accessibility will further improve with the implementation of Crossrail. As demonstrated in the SHLAA (2013) (LBR 2.05), Retail Site Opportunities Assessment (2015) (LBR 2.35), Employment Land Review (2016) (LBR 2.33) and Infrastructure Delivery Plan (2017) (LBR 2.12) these locations also offer a range of investment opportunities with substantial capacity to accommodate new homes, jobs and infrastructure. However, there is clearly insufficient brownfield land to meet the borough’s full development needs. The Council therefore considers that its significant development needs combined with its constrained land supply mean that there are ‘exceptional circumstances’ to justify the release of green belt land (see paragraphs 4.10 – 4.16) to provide additional land to contribute to meet these development needs.

4.3 The approach to each aspect of the overall strategy is summarised below.

Housing

4.4 The NPPF in paragraph 47 states that in order, *“to boost significantly the supply of housing”* local planning authorities should *“ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is*

consistent with the policies set out in this Framework". The approach set out in the Local Plan in policies LP2 – LP7 provide a strategy which deliver a wide choice of housing and create sustainable, inclusive and mixed communities. The Council will direct new homes to Investment and Growth Areas (LP1, LP1A, LP1B, LP1C, LP1D and LP1E) which are areas of the borough with the highest existing PTAL or where accessibility will increase as a result of the introduction of Crossrail in 2019. This approach is consistent with London Plan policies 3.3 and 3.4.

4.5 The Council’s objectively assessed housing need of 31,997 homes is nearly double that of the London Plan (2015) minimum housing target of 16, 845 (minimum 1,123 homes per year). The London Plan (2015) policy 3.3 states that boroughs *“should seek to meet and exceed minimum borough annual average housing targets”* and augment *“with extra housing capacity to close the gap between identified housing need and supply in line with the requirement of the NPPF”*. In addition, paragraph 3.19 states that this target should not be treated as a *“minima”*.

4.6 As discussed previously (in section 3) the borough’s land supply and availability is significantly constrained in the borough. The Council has undertaken a detailed assessment of the borough’s potential housing capacity as set out in Local Plan Appendix 1 – Development Opportunity Sites Review (LBR 1.01.3 and LBR 2.06). In addition, Concept Masterplans for Green Belt Release Sites (LBR 2.78) set out how these sites could contribute to addressing housing and other development needs.

Table 1 – Housing Capacity in Redbridge

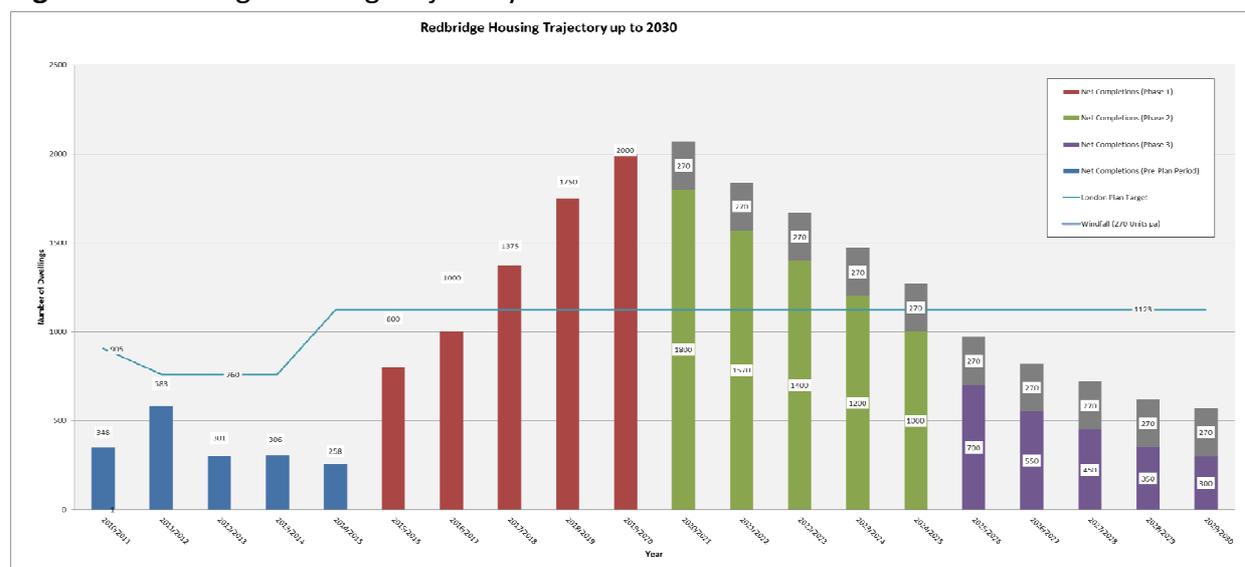
Investment and Growth Areas	Phase 1	Phase 2	Phase 3	TOTALS
Period	2015-2020	2021-2025	2026-2030	
1) Ilford	3,985	1,641	437	6,063
2) Crossrail Corridor	853	3,243	951	5,048
3) Gants Hill	187	386	0	573
4) South Woodford	182	273	33	487
5) Barkingside	298	215	614	1,127
Rest of the borough	1,422	1,210	306	2,938
TOTALS	6,927	6,968	2,341	16,236
Windfall	0	1,350	1,350	2,700
TOTALS with windfall	6,927	8,318	3,691	18,936

4.7 As set out in table 1 above, it has been estimated that the borough has capacity to provide approximately 18,936 new homes, including windfall. The identified capacity demonstrates that there is insufficient land supply and housing capacity to meet the borough’s objectively assessed housing need (OAN). However, there is sufficient capacity in the borough to meet and exceed its minimum London Plan housing target. Additional housing capacity, above the

minimum London Plan housing target, has been identified. This additional capacity will, in accordance with policy 3.3 of the London Plan (2015), contribute to closing the gap between identified housing need and supply in line with the requirement of the NPPF. In addition, this additional capacity provides a ‘buffer’ to ensure the Local Plan, in housing delivery terms, provides sufficient flexibility to adapt to rapid change in accordance with NPPF paragraph 14. Section 5 of this paper summarises the Sustainability Appraisals (SA) (LBR 1.11.2) assessment of ‘reasonable alternatives’. As set out in the SA, option 4 – Higher urban densification / higher green belt release, would deliver the highest number of homes (23,106) and get closest to meeting the borough’s OAN. However, the SA assesses that even delivering this number of new homes (still significantly short of OAN) would result in significant negative effects.

4.8 Modified Appendix 1 (LBR 1.01.3 and also see table 5 of LBR 2.06) sets out the individual sites which the Council has identified as having housing capacity in the borough. There are a total of 213 sites. Spatially, the majority of these sites are located in Investment and Growth Areas, with particular capacity in the south of the borough in Ilford and the Crossrail Corridor Investment and Growth Areas. Housing capacity is further ‘limited’ in the borough as the majority of sites in the borough (121 or 57%) are ‘small’ e.g. less than 0.25ha in size. The majority of sites, 209, are considered to be ‘brownfield’ previously developed land, whilst four sites are currently designated as the green belt. The housing capacity of ‘brownfield’ sites is approximately 16,180 homes (including windfall). The four green belt sites have a housing capacity of approximately 2,756 homes. Therefore, the Council cannot meet its minimum housing target as set out in London Plan (2015) (or even get close to meeting its objectively assessed housing need) without development of an element of green belt land. It should be noted that the Mayor’s SHLAA (2013) (REF 2.05) identified Ford Sports Ground, King George and Goodmayes Hospital Sites and Oakfield, all currently designated as Green Belt, as having significant housing capacity. The housing capacity identified in the SHLAA (2013) justified the Council’s minimum housing target as set out in table 3.1 of the London Plan.

Figure 1: Redbridge Housing Trajectory



4.9 Paragraph 47 of the NPPF requires the Council to identify a supply of specific deliverable sites sufficient to provide a 5 year housing supply. From 2010 to 2015, a total of 1,796 homes were built in the borough which resulted in a significant shortfall of 2,004 homes based on the Council's previous housing target (760 homes per year) set out in the London Plan (2011). Paragraph 47 of the NPPF states that in order to make up this previous short fall, a buffer of 20% should be included in the first five years of the Plan, which the Council has done. In addition, the Council places no reliance on windfall as a source of housing supply in the first five years of the plan period and focuses solely on the delivery of allocated Opportunity Sites. The windfall allowance of 2,700 homes is applied to the latter 10 years of the plan period (270 per annum for years 6-15 as set out in the London Plan). Table 3 above, shows that the Council can demonstrate a five year supply as it estimates that it can deliver approximately 6, 927 new homes in the first five years of the plan. In addition, the Local Plan also identifies specific, developable sites or broad locations for growth for years 6-10 (phase 2) and 11 – 15 (phase 3).

Approach to Green Belt

4.10 NPPF paragraph 83 sets out that once established, Green Belt boundaries *"should only be altered in exceptional circumstances, through the preparation or review of the Local Plan."* As set out in paragraph sections 2 and 3 above, the Council considers that its high levels of housing and other development needs, heavily constrained land supply and lack of brownfield land represent 'exceptional circumstances' for altering its Green Belt boundaries.

4.11 All of the boroughs existing Green Belt has therefore been assessed against Green Belt purposes, as defined in paragraph 80 of the NPPF as:

- *"to check unrestricted sprawl of large built-up areas;*
- *to prevent neighbouring towns merging into one another;*
- *to assist in safeguarding the countryside from encroachment;*
- *to preserve the setting and special character of historic towns; and*
- *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land"*

4.12 A number of assessments of have been carried out since work on the plan began, to ensure comprehensive consideration of all parcels put forward for release through various rounds of public consultation. Most recently, findings of all studies were brought together in the Green Belt Assessment 2016 (LBR 2.41), and accompanying Addendum 2017 (LBR 2.41.1). These concluded that the following areas of the Borough's Green Belt do not meet the NPPF Green Belt purposes, and could therefore be removed from the Green Belt without compromising the purpose and function of the Green Belt within the Borough :

- Roding Hospital and Surrounding Area (parcels GB11b and GB11c);
- Claybury Hospital (parcels GB12b and GB12c);
- Hainault Fields/ Oakfield (parcel GB13b);

- Fairlop Plain (parcel GB14b);
- King George and Goodmayes Hospital and Ford Sports Ground (parcels GB16b); and
- Billet Road (parcels GB14c)

4.13 All other parcels were found to meet at least one NPPF Green Belt test, and as such are proposed for retention as Green Belt in the Local Plan.

4.14 Of the parcels proposed for release, land at Hainault Fields, King George and Goodmayes Hospitals, and Billet Road, all offer sustainable locations to help meet the borough's development needs, as demonstrated through the Sustainability Appraisal (REF LBR1.11). They also all fall within the proposed Investment and Growth Areas.

4.15 Other parcels that do not meet NPPF tests comprise of: areas that have already been substantially developed around Claybury Hospital; areas around Roding Hospital that include some development interspersed with important open spaces; and land at Fairlop Plain in existing use as a school and associated playing field.

4.16 A further requirement of the NPPF is that when defining Green Belt boundaries, planning authorities should *"define boundaries clearly, using physical features that are readily recognisable and likely to be permanent"* (paragraph 85, NPPF). Based on the findings of the Green Belt Assessment (2016) and Addendum (2017), several small scale boundary amendments are therefore also proposed through the Local Plan to address matters such as historical mapping inaccuracies and errors. The Council consider that the amended Green Belt boundary is capable of enduring beyond the plan period.

Retail

4.17 Ilford is designated as a Metropolitan Town Centre in the London Plan, and is the key regional centre within the borough. District Centres exist in Barkingside, Gants Hill, South Woodford, Wanstead, Green Lane and Chadwell Heath. The borough is also home to a series of local centres and retail parades, and some out-of-centre retail parks.

4.18 As referred to in paragraphs 2.5, the Retail Capacity Study (LBR 2.34) identifies parameters of how much new retail space the borough's projected population growth can support. In addition, the Retail Sites Opportunities Assessment 2015 (LBR 2.35) has identified that the borough's minimum retail needs can be accommodated at opportunity sites in existing town centres.

4.19 The location of existing town centres in the borough correlates strongly with the areas where much of the new homes planned for the borough will be directed. The Local Plan, as set out in policies LP9, LP10 and LP11 therefore seeks to direct retail and leisure growth to existing town centres as part of mixed use developments. This is consistent with the requirements of NPPF paragraph 23 that policies *"promote competitive town centre environments and set out*

policies for the management of growth of centres over the plan period” and “recognise that residential development can play an important role in ensuring the vitality of centres”.

4.20 As the major centre in the borough, the highest level of retail growth is anticipated in Ilford. The level of growth in other Investment and Growth areas is commensurate with their role in the town centre hierarchy, and the level of opportunity that exists within existing town centre boundaries; taking account of matters such as existing character.

Employment

4.21 Paragraph 22 of the NPPF states that *“Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose”.*

4.22 The Council’s Employment Land Review 2015 (LBR 2.33) identified a relatively small existing supply of approximately 60ha of employment land in the borough. This includes land designated in previous plans as SIL or Local Business Areas, but also undesignated space. It comprises of a mixture of industrial estates and office buildings of varying quality. Unlike some neighbouring boroughs, the employment land portfolio does not include large areas of industrial legacy stock available for major redevelopment. On the contrary, the Employment Land Review found that all previously designated employment land was performing well, and that some additional, previously undesignated site also merited policy protection.

4.23 The approach set out in the Local Plan, policy LP14, is therefore to protect and intensify all well performing employment land, which is designated as either SIL or Local Business Areas. Doing so will help contribute to a sustainable pattern of development that will help prevent the borough becoming a dormitory borough. It is also in conformity with NPPF requirements that *“Planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment...”* (NPPF, para 37). Through this approach, SIL is protected for B1/2/8 uses in accordance with the London Plan, whilst mixed use development is only supported in Local Business Areas where it would not undermine the business function of the area.

4.24 The Local Plan also seeks to release poorer quality employment land to help meet the borough’s other pressing development needs, whilst also securing the provision of new, modern business space. This recognises the changing nature of the economy, will help *“support an economy fit for the 21st century”* in accordance with para 20 of the NPPF, and is consistent with the borough’s status as a ‘limited transfer borough’ in the London Plan. It also follows the Employment Land Review’s recommendations to plan for the managed the release of up to 14.45ha of poorer quality space, and provision of a minimum of 21,206 sq.m of new fit for purpose business space.

4.25 New business space will be provided through mixed use development of opportunity sites in town centres and accessible locations, and intensification of existing land either designated as SIL or Local Business Areas. The level of provision proposed in the boroughs different Investment and Growth Areas reflects the opportunities for such space within these areas.

Transport

4.26 The Local Plan, as set out in LP22, seeks to facilitate a modal shift towards sustainable travel patterns, through a range of means, including:

- Directing development to more accessible locations in the borough; i.e. town centres and Investment and Growth areas well served by public transport. This includes maximising the benefits of Crossrail by directing most growth and investment to Ilford and the Crossrail Corridor. This is consistent with NPPF requirements that *“plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised”* (NPPF, para 34) and London Plan requirements to *“maximise the development opportunities supported by Crossrail”* (London Plan, Policy 2.8)
- Seeking to minimise the need to travel by providing for an appropriate mix of uses in town centres and Investment and Growth areas, including not just residential, but also new business, retail and leisure space, and supporting infrastructure. This is consistent with NPPF requirements that *“planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities”* (NPPF, para 37);
- Offering genuine alternatives to private car, through investment in the public transport network, and public realm improvements that provide an enhanced environment for walking and cycling. This is consistent with NPPF requirements that the transport system is *“balanced in favour of sustainable transport modes, giving people a real choice about how they travel”* (NPPF, para 29)

4.27 The Local Plan Transport Evidence Report 2017 (LBR 2.50) examines the cumulative impact of projected population growth on the local transport network. It supports the approach set out in the Local Plan of directing development towards accessible locations, identifies areas of the transport network where the impact of this population growth is likely to most concentrated, and provides high level guidance of potential mitigation measures to be considered as individual planning applications come forward.

Flood Management

4.28 The Local Plan is supported by a Strategic Flood Risk Assessment (LBR 2.61.1) and as set out in LP21, seeks to direct vulnerable uses away from areas of highest flood risk in accordance with the NPPF and Planning Practice Guidance. Given the scale of boroughs development needs, and the need to promote a sustainable pattern of development, a small proportion of

development sites have been identified in areas of known flood risk. Where this is the case, they are supported by the findings of the Flood Risk Sequential and Exception Test (LBR 2.60).

Infrastructure Provision

4.29 Paragraph 018 of the Planning Practice Guidance states that “a Local Plan is an opportunity for the local planning authority to set out a positive vision for the area, but the plan should also be realistic about what can be achieved and when (including in relation to infrastructure)”. This includes “identifying what infrastructure is required and how it can be funded and brought on stream at the appropriate time; and ensuring that the requirements of the plan as a whole will not prejudice the viability of development.” Paragraph 72 of the NPPF attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. It states that LPAs should take a proactive, positive and collaborative approach to meeting this requirement. It goes further to state the LPAs should, “give great weight to the need to create, expand and alter schools”.

4.30 Based on the projected high level of demand, the Local Plan in policy LP18, provides a supportive policy framework for the delivery of social infrastructure which is identified as a priority in the growth areas (LP1A: Ilford, LP1B: Crossrail Corridor, LP1C Gants Hill, LP1D: South Woodford, and LP1E Barkingside). The need for provision of new education and health facilities in growth and investment areas is paramount give these are the areas of the borough which will experience greatest growth and increased demand.

4.31 Given the limited land supply, strategic sites proposed to be ‘released’ from the green belt at Billet Road, Goodmayes and King George Hospital, Oakfield and Ford Sports Ground are the locations for additional education and health provision. Four minimum 8 form entry schools are proposed on these sites. Without the release of these sites from the green belt the Council would not be able to meet its infrastructure development needs.

Heritage

4.32 The National Planning Policy Framework (NPPF) requires local planning authorities to set out a positive strategy for the conservation and enjoyment of the historic environment. It states in paragraph 126 and 128 for the need to conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.

4.33 Policy LP33 sets out the Council’s is committed to the positive conservation and use of heritage assets in the borough to ensure they make an important contribution to the identity, distinctiveness and character of Redbridge. This includes preserving and enhancing area special in character or assets and resisting development that which does not achieve this or which would result in harm or loss to such areas or assets. In addition, the Council would seek new development that has an impact on heritage assets and/or their setting to make a positive

contribute to the significance of such assets, and not diminish them in any way or lead to their loss, or the loss of their significance.

Approach to Tall Buildings

4.34 Tall buildings can be a very efficient way of using land and can make an important contribution to meeting the borough's development needs in a sustainable manner.

4.35 As the Tall Buildings in Redbridge Study (2017) (LBR 2.77) sets out, areas with high townscape sensitivity to tall building development occupy the majority of the borough. These areas are characterised by lower density housing, building heights of two to three storeys, established residential districts and key civic spaces. However, a number of areas have moderate townscape sensitivity to tall buildings and/or intensified development, where individual proposals would need to be carefully examined to explore how they integrated into the specific context. In general terms, these coincide with Investment and Growth Areas and other District Centres. LP27 sets out an approach to sensitively manage tall buildings in the borough by supporting them in 'less sensitive' locations which are highly accessible. The approach in the Local Plan seeks to balance the need to intensify housing and other uses to meet development needs against protecting areas with highly sensitive townscapes and the borough's heritage assets.

Green Space and Sports Reprovision

4.36 The NPPF, paragraph 73, states that, *"access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities"*. As set out in policy LP35, LP36, LP37 and LP40 the Council seeks to protect, enhance the quality and improve accessibility to existing green spaces in the borough. In addition, the Council would seek new major development to provide new open space provision.

4.37 As set out in paragraphs (4.10 - 4.16) above, the Ford Sports Ground and Oakfield are proposed to be 'released' from the green belt to contribute to meeting the borough's development needs in a sustainable manner. These sites also contain playing pitches and supporting facilities. The Council acknowledge that these pitches are not 'surplus' to requirements and therefore in accordance with the NPPF, paragraph 74, as set out in policy LP35, the Council is committed to re-providing the existing sports fields and supporting facilities with equivalent or better provision in a suitable alternative location before any potential redevelopment of either site. The Local Plan is supported with two feasibility studies (LBR 2.44.5 and LBR 2.44.6), which demonstrate there is scope to re-provide equivalent or better provision at Ford Sports Ground to Goodmayes Park Extension and at Oakfield to Hainault/Forest Recreation Ground. These sites are considered suitable locations given the relative close proximity to the existing sites. Both the Ford Sports Ground and Oakfield are proposed to come forward for development in the later phases (years 10 – 15) of the plan to enable sufficient time for detailed proposals to be developed and relocation to take place.

Biodiversity and Nature Conservation

4.38 In accordance with NPPF paragraph 118, Special Areas of Conservation should be given the same protection as European sites and proposed development on land within or outside a Site of Special Scientific Interest likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted. Policy LP39 seeks to protect any direct and indirect impacts on such designated areas by not permitting development which would have an adverse impact on them and promoting qualitative enhancements where appropriate.

5. Sustainability Appraisal

5.1 The SA process (LBR 1.11) supports the proposed overall strategy. Whilst the appraisal of the reasonable alternatives has highlighted that there are some negative aspects to the proposed overall strategy, it has enabled the Council to reach the conclusion that, on-balance, it is the most sustainable option.

5.2 Taking into consideration the borough's development needs, constraints and evidence base, the SA appraised four reasonable alternatives. The reasonable alternatives are summarised below:

- Option 1 - Higher urban densification / no GB release - this approach seeks to exhaust all densification opportunities and avoids removing land from the Green Belt.
- Option 2 - Urban densification / GB release - this is the Council's preferred strategy. It involves taking a 'balanced' approach to urban densification, recognising the borough's constraints including preserving character and heritage, and proposing the release of an element of Green Belt. Green belt sites proposed for release were also appraised against the SA framework, with particular consideration paid to paragraph 84 of the NPPF which states the, "*need to promote sustainable patterns of development.*" The SA process assessed that the location of the proposed green belt release sites would promote sustainable patterns of development.
- Option 3 Higher urban densification / GB release - this approach involves both maximising urban densification and releasing an element of Green Belt. Green belt sites proposed for release were also appraised against the SA framework, with particular consideration paid to paragraph 84 of the NPPF which states the, "*need to promote sustainable patterns of development.*" The SA process assessed that the location of the proposed green belt release sites would promote sustainable patterns of development
- Option 4 - Higher urban densification / higher GB release – a higher growth option which would involve both maximising urban densification and releasing additional green belt land in addition to parcels identified in options 2 and 3. Green belt sites proposed for release were also appraised against the SA framework, with particular consideration

paid to paragraph 84 of the NPPF which states the, “need to promote sustainable patterns of development.” The SA process assessed that the location of the proposed green belt release sites and found that not all sites would promote sustainable patterns of development.

5.3 Option 1 would be beneficial in terms of impact on biodiversity, traffic environment and providing a reliable transport network, however it would provide the least number of new homes, be less sustainable in terms of addressing poverty, promoting economic growth, providing community services and have a significant negative effect on education provision.

5.4 Option 3 would be beneficial in terms of biodiversity, climate change and traffic environment, however it would be less sustainable in terms of the traffic environment and conserving the quality of landscapes and townscapes.

5.5 Option 4 would be beneficial in terms of delivering the most homes and promoting economic growth, however it would be less sustainable in terms of biodiversity, traffic congestion, and reliable transport network and have a significant negative effect on conserving the quality of landscapes and townscapes.

5.6 Option 2, the Council’s preferred strategy, whilst not providing the most new homes would be beneficial in terms of addressing poverty, community services, conserving landscape and townscape, biodiversity, traffic congestion and reliable transport network. It would have a significant positive impact on education provision. Overall, the Council’s preferred spatial strategy, performed well in terms of the greatest number of sustainability objectives and is therefore considered to be the most appropriate development strategy when considered against reasonable alternatives.

5.7 The SA process demonstrates that on the whole, the proposed Local Plan spatial strategy represents a ‘balanced’ approach to accommodating and addressing the borough’s development needs growth within the context of the boroughs existing ‘constraints’ and limited land supply.

6. Conclusion

6.1 As set out in section 2, it is clear the projected population growth in the borough will generate significant development needs. As set out in section 3, land supply to meet these development needs is heavily constrained.

6.2 Given this, the Council is unable to meet all its development needs, particularly in relation to meeting objectively assessed housing need. The Council considers that meeting its full objectively assessed needs would, “result in adverse impacts, which would significantly and demonstrably outweigh the benefits, when assessed against the policies in the framework as a whole”. Nonetheless, the Council’s strategy will secure compliance with the London Plan requirement to meet and exceed the minimum housing target of 16,845 new homes during the plan period as well as meeting all infrastructure and other development needs.

6.3 Given this, the Council considers that the proposed strategy, as set out in the Local Plan, is the most appropriate, enabling the borough to accommodate its growth in the most sustainable manner in accordance with the NPPF.