

LONDON BOROUGH OF REDBRIDGE
Examination of Redbridge Local Plan 2015-2030

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INSPECTOR'S ISSUES AND QUESTIONS

This note sets out the main issues that I have identified in order to determine the soundness and legal compliance of the Local Plan. These will form the basis of the hearing sessions to be held. Furthermore, it poses both general and specific questions that I have in relation to the soundness of the Local Plan and which can be addressed in any hearing statements for Issues 1 to 6. However, there is no need for every question to be covered. Advice about statements is contained in my guidance note. Questions relating to Issues 7 to 12 will be produced in due course.

The site numbering used in this document is taken from the schedule of modifications to Appendix 1 (LBR 1.01.3).

Issue 1

Have the relevant procedural and legal requirements been met, including the duty to co-operate and those required by the Conservation of Habitats and Species Regulations 2010?

Questions:

- i) Is the Sustainability Appraisal undertaken suitably comprehensive and satisfactory and has it sufficiently evaluated reasonable alternatives?
- ii) Has the Council engaged constructively, actively and on an on-going basis with Epping Forest District Council in relation to the strategic matters of the provision of sites for gypsies and travellers? Should the Council have engaged with Epping Forest about the strategic matter of housing?
- iii) Does the Habitats Regulations Assessment comply with the Conservation of Habitats and Species Regulations 2010?
- iv) Does the HRA screening report (LBR 1.12) adequately address whether the Local Plan would have a likely significant effect on European conservation sites either alone or in combination with other plans or projects with particular reference to potential disturbance and air quality in the Epping Forest Special Area of Conservation?
- v) In addition to the details in the Consultation Statement (LBR 1.13) does the Council wish to say anything further about whether adequate consultation has been undertaken with residents in Ilford South and South Woodford?

Issue 2

Are the spatial vision and objectives for Redbridge (Section 2) sound having regard to the presumption in favour of sustainable development?

Issue 3

Is the overall spatial development strategy (Policy LP1) sound having regard to the needs and demands of the Borough; the relationship with national policy and Government objectives; the provisions of The London Plan and the evidence base and preparatory processes? Has the Local Plan been positively prepared?

Questions:

- i) Is the Local Plan in general conformity with The London Plan as required by the provisions of section 24 of the 2004 Act?
- ii) Will the strategy satisfactorily and sustainably deliver the new development and infrastructure needed over the plan period?
- iii) Does the Local Plan strike the correct balance between residential and employment uses?
- iv) Is the location of development proposed across the Borough justified given that the majority is due to take place in south Ilford?
- v) Is the evidence base adequate in terms of density, population, housing completions, parking, pollution and impact of Crossrail?

Issue 4:

Are the Investment and Growth Areas properly defined, do they positively promote the spatial vision and objectives for Redbridge and are the expectations for growth justified and deliverable?

Questions:

- i) What is the rationale for the selection of the Investment and Growth Areas?
- ii) Will the infrastructure required for the Investment and Growth Areas be delivered in a timely fashion to keep pace with development? How is it to be funded? Does the Infrastructure Delivery Plan (LBR 2.21) provide sufficient certainty? How and when will the infrastructure be triggered?

Issue 4a:

Are the policies for the individual Investment and Growth Area justified, consistent with national policy and will they be effective (Policies LP1A-LP1E)? Are the strategic and key sites within each of the Investment and Growth Areas justified when compared to other reasonable alternatives, deliverable within the plan period having regard to any constraints and consistent with national policy? Is the detail about the sites adequate in respect of use, form, scale, access and quantum of development?

Specific questions for each Investment and Growth Area:

Ilford – Policy LP1A

- i) Are the development opportunity sites justified when compared to other reasonable alternatives, deliverable within the plan period having regard to any constraints and consistent with national policy? Is the detail about the site allocations adequate in respect of use, form, scale, access and quantum of development?
- ii) Is the proposed quantum of development justified and would there be a reasonable balance between new homes and retail and employment floorspace?

- iii) Would the Local Plan ensure the provision of sufficient and suitable infrastructure required as a result of the proposed growth and regeneration in Ilford with particular reference to schools, health services, child care and leisure?
- iv) Would there be adequate capacity for car parking within the Investment and Growth Area?

Crossrail Corridor – Policy LP1B

- i) Is the Crossrail Corridor aptly named?
- ii) Are the strategic sites justified when compared to other reasonable alternatives, deliverable within the plan period having regard to any constraints and consistent with national policy? Is the detail about the site allocations adequate in respect of use, form, scale, access and quantum of development? Could they provide the number of dwellings anticipated having regard to the concept masterplans (LBR 2.78)?
- iii) How would the development of the strategic sites promote sustainable patterns of development?
- iv) Do the strategic sites meet any of the 5 purposes of the Green Belt in paragraph 80 of the NPPF?
- v) Has there been any material change in circumstances since the original designation of the Green Belt?
- vi) Having regard to paragraph 74 of the NPPF would the loss of existing open space, sports and recreation buildings and land be replaced by equivalent or better provision in terms of quantity and quality in a suitable location?
- vii) How will the cost of re-provision and future maintenance be funded?
- viii) In sporting and recreational terms is it justified to replace an existing, established facility with a new one?
- ix) How will the transition between existing and new facilities be controlled and managed?
- x) Are schools required on each of the allocated strategic sites?
- xi) Is the expectation of a decentralised energy network at King George and Goodmayes Hospitals justified?

Strategic sites

- 67 King George/Goodmayes Hospitals
- 68 Ford Sports Ground
- 97 Billet Road

South Woodford – Policy LP1D

- i) Given the number of opportunity sites expected to come forward does South Woodford warrant the designation of Investment and Growth Area?
- ii) Is there a suitable balance between proposed residential and employment uses? How and where are the proposed retail and employment floorspace to be delivered?
- iii) Policy LP22 seeks to resist new development that results in unacceptable adverse impacts on the public transport system unless it incorporates effective mitigation measures. Would the proposals at South Woodford have such an impact due to capacity issues on the Central Line and what mitigation measures might be expected from individual developments? How do TfL intend to take this matter forward? To what extent will Crossrail relieve stress on the Central Line? Alternatively, are public transport capacity issues so serious that the amount of development proposed should be reduced?

- iv) In response to R00104/02 the Council indicates that a scheme to signalise Charlie Browns roundabout and make improvements is under consideration. What is the latest position and is there adequate transport capacity generally to cope with the development proposed?
- v) Would there be adequate capacity for car parking within the Investment and Growth Area?
- vi) Does modification 33 to remove reference to a contemporary landmark within the town centre at Station Estate (site 117) affect the indicative capacity of 120? What is the justification for the change?
- vii) Should Station Estate be earmarked for specialist accommodation for the elderly? What is the status of the adopted brief?
- viii) Would the Local Plan ensure the provision of sufficient and suitable infrastructure required as a result of the proposed growth and regeneration in South Woodford with particular reference to schools, health services, child care and leisure?
- ix) Are the key sites identified justified when compared to other reasonable alternatives, deliverable within the plan period having regard to any constraints and consistent with national policy? Is the detail about the site allocations adequate in respect of use, form, scale, access and quantum of development?

Key sites

- 115 31 Marlborough Road and South Woodford station car park
- 116 120 Chigwell Road
- 117 Station Estate
- 119 Tesco Store

Barkingside – Policy 1E

- i) Is the strategic site at Oakfield, Forest Road (133) justified when compared to other reasonable alternatives, deliverable within the plan period having regard to any constraints and consistent with national policy? Is the detail about the site allocation adequate in respect of use, form, scale, access and quantum of development? Could it provide the number of dwellings anticipated having regard to the concept masterplan (LBR 2.78)?
- ii) Does Oakfield meet any of the 5 purposes of the Green Belt in paragraph 80 of the NPPF?
- iii) Has there been any material change in circumstances since the original designation of the Green Belt?
- iv) Having regard to paragraph 74 of the NPPF would the loss of existing open space, sports and recreation buildings and land be replaced by equivalent or better provision in terms of quantity and quality in a suitable location?
- v) How can it be certain that replacement provision will be equivalent or better when the Feasibility Report for Oakfield Playing Pitch Re-provision (LBR 2.44.1) has not assessed the quality of pitch provision at Oakfield?
- vi) How will the cost of re-provision and future maintenance be funded?
- vii) In sporting and recreational terms is it justified to replace an existing, established facility with a new one? Has sufficient account been given to youth provision and the needs of adjoining Boroughs?
- viii) How will the transition between existing and new facilities be controlled and managed?
- ix) As Hainault Recreation Ground is within an area safeguarded for mineral extraction does it provide a suitable, long-term alternative to Oakfield?

- x) What will be the impact of the development at Oakfield in terms of traffic and air pollution?
- xi) To what extent is Oakfield in a sustainable location?
- xii) How would the development of Oakfield promote sustainable patterns of development?
- xiii) What implications do the designation of the site as an asset of community value and the existence of a covenant have on the allocation and delivery of Oakfield?

Issue 5:

Are the policies for housing growth and affordable housing (Policies LP2 & LP3) justified, deliverable and consistent with national policy?

Questions:

- i) Has the Council done all it can, in co-operation with other Boroughs and Districts, to identify previously-developed land, including that in neighbouring authorities including Epping Forest District, before releasing Green Belt land for development?
- ii) Should housing need be assessed on a London-wide basis or within the Outer North East London housing market area?
- iii) Is the minimum housing target of 16,845 justified having regard to the aim in The London Plan to "close the gap" to objectively assessed need and the expectation in Table 3 (as modified) (LBR 1.01.3) that 18,936 dwellings will be delivered during the plan period?
- iv) What is the justification for the inclusion of an allowance of 2,700 dwellings from windfall sites given that paragraph 5.16 of the London Strategic Housing Land Availability Assessment (LBR 2.05) indicates that dependence on windfall capacity should be minimised?
- v) Will the Local Plan provide a 5 year supply of deliverable sites with an appropriate buffer in accordance with paragraph 47 of the National Planning Policy Framework? Is this on track for the first phase of the Plan from 2015-2020? How is any shortfall in delivery over that period to be addressed? Will the policies in the Local Plan ensure the on-going availability of a 5 year supply?
- vi) Having regard to the SRQ matrix in The London Plan (Table 3.2) has the Council made reasonable assumptions about densities that can reasonably be achieved at opportunity sites given that paragraph 3.84 of the London Strategic Housing Land Availability Assessment (LBR 2.05) indicates that outer London Boroughs may have to encourage higher density development to help meet their pressing needs?
- vii) Are the assumptions and analysis in Appendix 1 of the Development Opportunity Sites Review (LBR 2.06) reasonable and realistic? Is this assessment sufficiently comprehensive?
- viii) Will the 2km buffer zone around the Epping Forest SAC affect the deliverability of developments within that area? What mitigation measures are likely to be possible?
- ix) Are the sites relied upon for the supply of housing deliverable and developable in accordance with paragraph 47 of the National Planning Policy Framework?
- x) Is there sufficient flexibility within the allocations to accommodate unexpected delays whilst maintaining an adequate supply?
- xi) How would the supply of housing sites be monitored and managed? Does the Local Plan contain a housing implementation strategy?

- xii) What is the rationale for the minimum strategic affordable housing target of 30%? Does this respond adequately to the objectively assessed need for affordable housing, the Viability Assessment (LBR 2.11), The London Plan and the aspirations of the Mayor of London?
- xiii) Following a High Court judgment the Written Ministerial Statement of 28 November 2014 regarding section 106 obligations is now national policy. This provides that due to the disproportionate burden of contributions on small-scale developers, for sites of 10-units or less, and which have a maximum combined gross floor space of 1,000 square metres, affordable housing and tariff style contributions should not be sought. Accordingly should Policy LP3 be adjusted to refer to 11 homes or more?
- xiv) What is the reason for including reference to the capacity of a site in Policy LP3? How is this to be assessed?
- xv) Has the Council considered increasing the total housing figures in order to help deliver the required number of affordable homes in accordance with the PPG (ID 2a-029-20140306)?
- xvi) Does the Local Plan adequately address the needs for all types of housing (excluding affordable housing) and the needs of different groups in the community as set out in paragraph 159 of the National Planning Policy Framework?

Issue 6:

Are there exceptional circumstances that warrant altering Green Belt boundaries?

Questions:

- (i) Having regard to the NPPF, the housing targets in The London Plan, the policy approach of supporting growth without encroaching on the Green Belt, the identification of Green Belt in the London SHLA as a policy constraint (paragraph 2.40 of LBR 2.05) and the objectively assessed need for housing in the Borough should Green Belt sites be released for development as a matter of principle?
- (ii) Did the SHLA identify Green Belt sites as having "significant housing capacity" as indicated at paragraph 4.8 of the Spatial Strategy Topic Paper (LBR 1.04)?
- (iii) How would the release of Green Belt sites promote sustainable patterns of development?
- (iv) Paragraph 4.31 of the Spatial Strategy Topic Paper (LBR 1.04) observes that without the release of Green Belt sites the Council would not be able to meet its infrastructure needs. What weight should be given to this consideration in determining whether exceptional circumstances exist?
- (v) Is the methodology within the Green Belt Review Addendum (LBR 2.41.1) and the previous reviews robust and are its conclusions logical? In particular, is the interpretation of what is meant by "town" and "countryside" in this context reasonable? Have these terms been applied consistently?
- (vi) What would be the impact of the proposed housing sites on the Green Belt in terms of its aims and purposes?
- (vii) To what extent should the provisions of paragraph 81 of the NPPF regarding planning positively to enhance the beneficial use of the Green Belt be taken into account?
- (viii) Are there any sites where land has been included in the Green Belt which it is unnecessary to keep permanently open?

- (ix) Are the proposed minor boundary changes and additions to the Green Belt justified by exceptional circumstances?
- (x) Is the Council satisfied that the Green Belt boundaries will not need to be altered at the end of the development plan period?
- (xi) Have the proposed boundaries been defined clearly, using physical features that are readily recognisable and likely to be permanent?

Issue 7:

Are the policies relating to town centres and employment (Policies LP9, LP10, LP11 and LP14) and the other policies relating to promoting and managing growth in Section 3 justified, consistent with national policy and will they be effective?

Issue 8:

Are the policies relating to promoting sustainable transport and cycle and car parking (Policies LP22 & LP23) and the other policies relating to promoting a green environment in Section 4 justified, consistent with national policy and will they be effective?

Issue 9:

Are the policies relating to achieving quality design and to tall buildings in Section 5 (Policies LP26-LP33) justified, consistent with national policy and will they be effective?

Issue 10:

Are the policies relating to managing and enhancing the Borough's assets in Section 6 (Policies LP34-40) justified, consistent with national policy and will they be effective?

Issue 11:

Are the other development opportunity sites in Appendix 1 justified when compared to other reasonable alternatives, deliverable within the plan period having regard to any constraints and consistent with national policy?

Issue 12:

Does the Local Plan have clear and effective mechanisms for implementation, delivery and monitoring (Policy LP41)?

David Smith

INSPECTOR

6 April 2017