

12 May 2017

The Redbridge Local Plan 2015 – 2030

Local Plan Examination Hearing Statement in Relation to the Exchange Centre, Ilford

Statement Submitted on behalf of Capital & Regional

Inspector Issue Number 11

1.0 Introduction

1.1 This Examination Hearing Statement is submitted by Savills (UK) Limited on behalf of Capital & Regional in relation to the Redbridge Local Plan 2015 – 2030 Examination.

1.2 Capital & Regional is the owner of the Exchange Centre in Ilford town centre. The Exchange Centre is identified as one of the ‘Development Opportunity Sites’ at Appendix 1 of the draft Local Plan (‘LP Site Number: 2’). Appendix 1 lists a series of uses including, retail, leisure, employment and housing that will be supported at the Centre.

1.3 The Hearing Statement is submitted in relation to the Inspector’s Issue Number 11, which relates to Development Opportunity Sites and states:

‘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?’

1.4 The Statement sets out Capital & Regional’s support for the uses proposed for the Exchange Centre subject to minor amendments to expand the range of leisure uses that will be supported at the Centre.

1.5 Listing the specific uses requested as part of this Statement will ensure that the key commercial destination that underpins the vitality and viability of Ilford town centre can fully meet consumer and market requirements. This will enable it to fully contribute to the prosperity of the town centre and wider Borough of Redbridge over the Local Plan period.

1.6 The amendments set out below fully accord with the objectives of local and national policies that adopt a ‘town centre first approach’ for retail and leisure uses. Importantly the requested amendments accord with the aim of Redbridge Council *‘to create a vibrant and attractive town*

*centre, with clusters of opportunities for new homes, high quality leisure and culture uses, and a new civic presence.*¹

1.7 To support the case for the allocation of the site, the Statement is structured as follows:

- **Section 2:** Background Information: The Role of Ilford Town Centre and the Exchange Centre in the Retail Hierarchy
- **Section 3:** Recent Planning History of the Exchange Centre
- **Section 4:** Requested Amendments to the Draft Local Plan
- **Section 5:** Summary and Conclusion

Section 2: Background Information: The Role of the Exchange Centre and Ilford Town Centre in the Retail Hierarchy

2.1 The Exchange Centre is located at the ‘heart’ of Ilford town centre². The Exchange Centre is a modern purpose built retail and commercial destination originally built in 1989 providing approximately 27,800 sq. m (300,000 sq. ft) of floorspace in 90 units for a range of uses including non-food and food shopping operations and leisure uses including restaurant, café, take-away and health and fitness club facilities.

2.2 Ilford town centre itself is the largest town centre in Redbridge providing over 200,000 sq. m of retail, leisure, service and commercial floorspace³.

2.3 Ilford is identified in the adopted London Plan, dated March 2016, as an Opportunity Area (Map 2.4) and ‘Metropolitan Centre’ that serves east London. Its Metropolitan Centre status defines it as one of the most important centres in London⁴.

2.4 Table A1.1 of the London Plan provides details of Ilford’s ‘Opportunity Area’ status and states:

‘Ilford is both an Opportunity Area and a Metropolitan town centre serving outer east London. There is scope to provide at least 5,000 additional homes on development sites in and around the town centre. Comprehensive redevelopment of key sites should reinforce its

¹ See Paragraph 3.3.2 of the emerging Local Plan.

² See also cross-reference to Paragraph 3.3.4 of the emerging Local Plan where the Council confirms that the Exchange Centre is located at the heart of Ilford town centre.

³ See Table 7 of the Retail, Leisure & Office Demand Study for London Borough of Redbridge Planning Policy and Environment Unit, dated 23 August 2012.

⁴ Metropolitan Centres are the key centres in London after the defined ‘International Centres’ of the West End and Knightsbridge.

Metropolitan centre role with improvements to the range and quality of the retail offer and build upon its strengths as a new leisure oriented location to serve the wider area. Longer term development, which could include some office provision as part of a wider mix of town centre uses, will be assisted by improved transport links, particularly Crossrail 1 and the East London Transit. (Savills' emphasis in bold)

- 2.5** The town centre is an extremely accessible location. Paragraph 3.3.1 of the draft Local Plan identifies that it benefits from the highest levels of transport accessibility and this is set to further improve with the introduction of Crossrail that: *'will allow passengers to travel from Ilford to Stratford in 10 minutes, and from Ilford to Central London in 20 minutes.'*
- 2.6** The Exchange Centre is at an extremely well-connected area within the town centre. It includes an important multi-storey car park that provides 1,200 spaces and contributes to the accessibility of both the Exchange Centre and Ilford town centre as a whole. In addition the Exchange Centre is well placed to benefit from sustainable and public transport links being located directly east of Ilford train station and adjacent to numerous bus stops that serve the town centre, providing access from the surrounding urban areas.

Section 3: Recent Planning History of the Exchange Centre

- 3.1** The following are the notable recent planning permissions / applications relevant to the Exchange Centre:
1. Planning permission granted for an extension to the centre comprising the creation of an additional 1,000 sq. m of commercial space at upper roof level (Reference 0030/12).
- 3.2** The Permission was granted in March 2012.
2. Planning permission granted for the erection of a podium above the car park comprising a new tower (Part 26, part 11 and part 7 storeys) to deliver 214 residential units (30% affordable) and 300 sq. m of additional commercial space (Flexible Class A and B1) (Reference 4265/15).
- 3.3** The Permission was granted in February 2017.

Section 4: Requested Amendments to the Draft Local Plan

- 4.1** The above demonstrates that the Exchange Centre is the key commercial destination that underpins the vitality and viability of Ilford town centre.
- 4.2** As the Council will be aware, the role of town centres is evolving. This is a response to both changing consumer habits and digital technology that both creates opportunities to attract consumers to town centres, but also reduces the attraction of centres (for example as a result of online shopping).
- 4.3** In response to a shift in consumer habits, landlords and operators of commercial property assets have sought to provide a much wider offer to increase attraction and dwell times within centres. This has resulted in new and reimagined forms of attractions in centres. A particular emphasis has been a substantial increase in leisure and residential development in town centres. The increase in leisure and residential floorspace has had positive effects on centres by increasing living and dwell time and enhanced spending within centres.
- 4.4** Against that background, the minor amendments requested below do not conflict with the objective of local and national policy to ensure the vitality of town centre locations, and nor do they conflict with the current and planned role of Ilford town centre to meet its current and future users' full range of retail, leisure, commercial and residential development needs. The amendments are particularly important given the large amount of residential development planned in the Metropolitan Centre, including at the Exchange Centre. Providing the mix of uses suggested at the Exchange Centre will ensure that it can fully contribute to the town centre as a vital destination for people to live, work, shop and enjoy leisure activities.
- 4.5** Capital & Regional as owner of the Exchange Centre support the Council's objectives in the that recognise the Centre as the 'heart' of Ilford town centre and one of Ilford's Investment and Growth Areas ('Development Opportunity Sites' at Appendix 1 of the draft Local Plan ('LP Site Number: 2')). The table at Appendix 1 lists the uses that will be supported as follows: *'Employment, Retail, Housing, Leisure (including restaurant, beverage, café and hotel)'*.
- 4.6** Capital & Regional support the above uses, but request that the list of uses that will be supported at The Exchange Centre include the leisure uses set out below. This will provide a flexible approach that will enable the Centre to fulfil its role as the 'heart' of Ilford town centre over the Local Plan period and be 'future-proofed' so that it can easily respond to shifting

consumer and market requirements for town centre locations.

4.7 The requested amendments are to provide a comprehensive list of the leisure uses that will be supported. The additional leisure uses that the Centre could accommodate are cinema, bowling, trampoline park, children's activity centre and similar leisure uses compatible with a town centre location.

4.8 The requested amendments to Appendix 1 are shown in tracked changes as follows:

1. The 'Proposed Use' for the Exchange Centre:

- **Proposed Use:** Employment, Retail, Housing, Leisure (including restaurant, beverage, café, cinema, bowling, trampoline park, children's activity centre, and hotel and similar leisure uses compatible with a town centre location)

2. The Proposed Site Allocation Description:

'The Exchange Shopping Centre is a key part of Ilford's retail and leisure offer. The site has planning permission for 214 new homes.

A range of uses would be supported within the Shopping Centre which includes new employment, retail and leisure (including restaurant, beverage ~~and~~ café, cinema, bowling, trampoline park, children's activity centre, and hotel and similar leisure uses compatible with a town centre location) to support the vitality and viability of the town centre. This will particularly be the case in vacant units within the town centre.

The site is also included in the Ilford Housing Zone.'

4.9 In particular, market demand has arisen from cinema occupiers who are looking to gain representation at the Exchange Centre. The minor amendments will therefore ensure that this and all future possible market requirements can be met.

4.10 The above amendments are consistent with the following local policies in both the draft Local Plan and adopted London Plan that seek to support the importance of Ilford town centre as a vital and viable 'Metropolitan Centre'⁵:

⁵ The centre is defined as a Metropolitan Centre in the London Plan.

- Policy LP1 that sets out the ‘Spatial Development Strategy’ for Redbridge including the delivery of the ‘Opportunity Sites’ that includes the Exchange Centre.
- Policy LP1A that identifies Ilford as an ‘Investment and Growth Area’ and also identifies the ‘Opportunity Site’ in the reasoned justification to the Policy.
- Policy LP2 that relates to ‘Delivering Housing Growth’ and seeks to focus and prioritise new homes in the Borough’s ‘Investment and Growth Areas’ of Ilford.
- Policy LP9 that seeks to ensure the ‘Future Vitality and Viability of Town Centres’.
- The general thrust of Policy LP10 (see further commentary at Paragraph 4.13 – 4.14 below) that seeks to support the role of town centres by promoting a diversity of uses.
- Policy LP12 that seeks to support and foster a diverse range of night-time uses in town centres.
- Policy LP13 that supports the development of hotel facilities and tourist accommodation within Metropolitan Centres, in particular those that have good public transport connections to central London.
- Policy LP22 that relates to ‘Promoting Sustainable Transport’ and seeks to direct new development which generates high transport demands to highly accessible locations such as the ‘Investment and Growth Areas’ and town centres.
- Policy LP27 that relates to ‘Tall Buildings’ and seeks to support tall buildings and the intensification of land uses with Ilford Metropolitan Centre. This is an particularly important policy support for the proposals outlined above as any residential development and expansion of leisure uses at Exchange Centre will likely be in the form of tall buildings and the intensification of land uses within the town centre.
- Policies 2.15 and 4.7 of the London Plan that sets out the support for town centre locations and the range of retail, leisure and commercial development that they can support.
- Table A1.1 of the London Plan that sets out that Ilford is an ‘Opportunity Area’.
- Table A2.1 of the London Plan that sets out Ilford town centre’s classification and broad future direction as a ‘Metropolitan Centre’.

4.11 The amendments requested also fully accord with ‘The Vision for Redbridge’ set out at Section 2 of the draft Local Plan and in particular the objectives for ‘Managing Growth and Investment’ and ensuring ‘Economic Vitality and Prosperity for All’. ‘Future-Proofing’ the Exchange Centre to ensure that it will remain vital and viable accords with the following ‘Vision’ commentary:

‘Intensification of the borough’s employment areas and town centres will attract regional, national and international investors across all sectors to successfully deliver new jobs, assisting

in securing the provision of employment training opportunities for local residents.'

4.12 Paragraph 151 of the National Planning Policy Framework ('The Framework') require local plans to be consistent with the principles and policies of The Framework. The amendments also accord with the 'Town Centre First' policies of The Framework as well as the guidance National Planning Practice Guidance ('The Guidance'), namely:

1. The 'Town Centre First' approach of Section 2 of The Framework.
2. Paragraph 23 of The Framework that seeks to:
 - a. Promote competitive town centre environments that provide for customer choice and a diverse offer
 - b. Promote policies that:
 - i. Recognise town centres as the heart of communities
 - ii. Allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres
 - iii. Recognise that residential development can play an important role in ensuring the vitality of centres
3. Paragraphs 002 and 003 of the section in The Guidance titled 'Ensuring the vitality of town centres' that outlines the requirement for councils to identify a strategic 'positive vision' for town centres that identifies all opportunities to meet development needs that support the vitality and viability of town centres.
4. Paragraph 004 of The Guidance that confirms that local planning authorities should take full account of relevant market signals when planning for town centres. The market signals in this case are for the leisure uses set out at Paragraph 4.8 above.

Section 5: Summary and Conclusion

5.1 This Examination Hearing Statement sets out its support for the Council's overall objectives in the draft Local Plan that recognise the Exchange Centre as the 'heart' of Ilford town centre and one of Ilford's Investment and Growth Areas ('Development Opportunity Sites' at Appendix 1 of

the draft Local Plan ('LP Site Number: 2').

5.2 However, the Statement sets out that minor amendments are required to Appendix 1 which will provide certainty over the leisure uses that will be supported at the Exchange Centre.

5.3 The Statement demonstrates that the amendments accord with:

1. The relevant policies in the draft Local Plan;
2. The relevant policies in the adopted London Plan;
3. The National Policy Framework and in particular, the 'Town Centre First Approach'; and
4. The requirement for councils to identify a strategic 'positive vision' for town centres that identifies all opportunities to meet development needs that support the vitality and viability of town centres as set out in the National Planning Practice Guidance.

5.4 In terms of the Inspector's questions at Issue Number 11, we confirm that:

1. The amendments are justified as the accord with the 'town centre first' policy approach.
2. The inclusion of the uses requested ensure that the Exchange Centre is able to meet market and consumer requirements to provide a vital and viable town centre retail, leisure and economic development destination over the plan period.
3. The amendments are consistent with national policy for the reason set out at (1) above and Paragraph 4.12.

5.5 Accordingly, we request that the above amendments are incorporated into the Local Plan in order for the development plan to be considered sound. We will attend the Hearing to make further representation if required.