

## **CED005 Council's Response to Issue 2**

### **Issue 2**

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

- 1.1 The Council considers the overall spatial vision and objectives for Redbridge are sound and provide a positive framework for the borough consistent with national policy, having regard to the presumption in favour of sustainable development. The vision and objectives provide a positive approach towards development, promoting growth particularly in the Investment and Growth Areas and other accessible locations and recognising the benefits this can bring to residents, employees and visitors to Redbridge.
- 1.2 The Plan is a positive strategy for delivering sustainable development and delivering the Council's priorities for growth, securing new housing and meeting housing need, boosting the economy and creating new jobs.
- 1.3 Paragraph 14 of the National Planning Policy Framework (NPPF) sets out 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 and that Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change (subject to the proviso within that part of para.14 being met).
- 1.4 NPPF paragraph 156 states that Local Plans should set out the strategic priorities for the area and include policies to deliver the homes and jobs needed. Local Plans should plan positively for development, indicate broad locations for strategic development on a key diagram and allocate sites to promote development and flexible land use of land bringing forward new land where necessary and provide detail on form, scale, access and quantum of development where appropriate (paragraph 157).
- 1.5 Local plans must be based on robust evidence and have a clear understanding of housing needs and business needs (paragraphs 159 and 160).
- 1.6 Furthermore, paragraph 182 incorporates infrastructure requirements into one of the tests of soundness for Local Plans. This states that for plans to be "positively prepared" they should "be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements".
- 1.7 The Local Plan includes a series of strategic objectives which have been developed to respond to the objectively assessed needs of the borough. Taking each in turn, it is clear that the vision and objectives meet the four tests of soundness in the NPPF having regard to the presumption in favour of sustainable development:

## **Vision**

- 1.8 The Local Plan includes a clear vision which seeks to address the spatial implications of social, economic and environmental change over the plan period. It provides a clear indication of where the majority of growth will be directed to, through the identification of five Investment and Growth Areas. The vision is justified and supported by a robust evidence base.
- 1.9 The vision has been developed to positively seek opportunities to meet the development needs of the borough, and planning to meet objectively assessed needs for homes, jobs and community infrastructure, in a way compatible with the specific context and constraints of Redbridge.
- 1.10 As such, the Vision is sound and complies with the presumption in favour of sustainable development set out NPPF para.14.

## **Strategic Objectives**

- 1.11 The objectives have been developed to help deliver the vision and to respond to the challenging needs which the borough faces, in line with paragraph 156 and 157 of the NPPF. They are considered to be justified, effective, positively prepared and consistent with national and London Plan policy. They are therefore considered to be sound and reflect and deliver sustainable development.

### **Objective 1: Promoting and managing growth**

- 1.12 Positively prepared: A number of objectives to deliver the range of homes including affordable housing and jobs needed in Redbridge, a clear indication of where growth is to be directed to through the identification of Investment and Growth Areas, along with the necessary supporting community infrastructure such as health and education facilities, based on a clear understanding of the borough's assessed needs.
- 1.13 Justified: the objective to achieve sustainable patterns of growth and direct development to the five Investment and Growth Areas, town centres and other development opportunity sites is the most appropriate strategy, when considered against reasonable alternatives, as demonstrated through the SA process.
- 1.14 Effective: the inclusion of deliverable housing targets, a five year housing land supply and identification of key infrastructure projects to meet housing growth over the plan period.
- 1.15 Consistent with national policy: the objectives reflect the requirements of the NPPF in relation to plan making and are consistent with London Plan policy.

## **Objective 2: Promoting a green environment**

- 1.16 Positively prepared: includes a suite of objectives to encourage sustainable transport, address climate change mitigation and adaptation and manage flood risk, consistent with achieving sustainable development.
- 1.17 Justified: the overall growth strategy is to direct development to the most accessible areas of the borough – the five Investment and Growth Areas, which will contribute towards encouraging sustainable patterns of transport by improving public transport and enhancing connectivity between Ilford and central London with the arrival of Crossrail.
- 1.18 Effective: objectives are flexible to ensure the plan is deliverable and effective.
- 1.19 Consistent with national policy: the objectives reflect the requirements of the NPPF in relation to plan making and are consistent with London Plan policy.

## **Objective 3: Promoting a high quality design**

- 1.20 Positively prepared: contains clear objectives for enhancing the built environment, a set of design principles and approach to tall buildings to deliver the spatial strategy, recognising the constraints of the borough.
- 1.21 Justified: the objective to achieve sustainable patterns of growth and direct development to the five Investment and Growth Areas, town centres and other development opportunity sites is the most appropriate strategy, when considered against reasonable alternatives, as demonstrated through the SA process.
- 1.22 Effective: objectives are flexible to ensure the plan is deliverable and effective.
- 1.23 Consistent with national policy: the objectives reflect the requirements of the NPPF in relation to plan making and are consistent with London Plan policy.

## **Objective 4: Protecting and enhancing Redbridge's assets**

- 1.24 Positively prepared: includes a clear set of objectives for enhancing and protecting the natural and built environment, including a comprehensive review of the Green Belt.
- 1.25 Justified: the quantum of development proposed across the borough has been established to respond to specific constraints such as green belt and conservation areas, justified through the sustainability appraisal process.
- 1.26 Effective: objectives are flexible to ensure the plan is deliverable and effective.
- 1.27 Consistent with national policy: the objectives reflect the requirements of the NPPF in relation to plan making and are consistent with London Plan policy.