

## **CED006 Council's Response to Issue 3**

### **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?**

- 1.1 The Council considers the Local Plan is in general conformity with the London Plan as required by the provisions of section 24 of the 2004 Act.
- 1.2 Redbridge has continuously and actively engaged and worked in partnership with GLA officers throughout the development of the Local Plan. Through formal consultation undertaken in 2013 and 2014, the GLA has given general support for the Council's overall development strategy. This included support for its approach to Green Belt. In particular, the Mayor stated support for the Council's efforts to find new sources of housing capacity, and stated that this should be based on the principles of sustainable development and that public transport accessibility should be a key factor in determining site suitability.
- 1.3 However, in his letter dated 11<sup>th</sup> October 2016, the Mayor's opinion is "that whilst he supports many aspects of the plan, it is not in conformity with the London Plan as it has not demonstrated "exceptional circumstances" to support the proposed release of Green Belt". The letter goes on to say that the Council could do further work to explore other opportunities to further close the gap between local supply and need, in particular releasing capacity in Ilford and other Investment and Growth Areas.
- 1.4 According to the Council, and given the requirement of the NPPF to meet development needs, in the context of the borough's development and existing constraints, it has developed the most appropriate spatial strategy to respond to this. It therefore believes the Local Plan is in general conformity with the London Plan. The reasons for this are explained below.
- 1.5 Sections 2 and 3 of the Council's Local Plan Spatial Strategy Topic Paper (LBR 1.04) clearly set out the borough's development and existing constraints which justify the rationale for the preferred spatial strategy for

growth. It is the borough's development needs, and in particular, the need to provide land for new housing and infrastructure, that amount to "exceptional circumstances" which justify revisions to the green belt.

- 1.6 The Local Plan seeks to meet the minimum target for new housing set out in Table 3.1 of the London Plan, 1,123 new homes per year during the Plan period. The housing need for Redbridge identified within the Outer North East London SHMA (2016) (LBR 2.01) and more recently in the updated SHMA (2017) (CED003) is substantially in excess of the minimum target set out in the London Plan. However, the Council is not able to deliver a level of housing identified in the SHMA without further substantial green belt release. This is demonstrated in the Interim SA Report (2017) (LBR 1.11.2).
- 1.7 The level of supply proposed through the Local Plan is approximately 18,700. This level of housing supply exceeds the minimum required by the London Plan (16,845). The Council justifies the supply on the basis that it provides flexibility during the plan period, as set out in national planning policy. It also seeks to "close the gap" between the need set out in the SHMA. Importantly, the Council cannot deliver housing to meet the minimum target derived from the London Plan without some release of land from the Green Belt. Furthermore, the release of some Green Belt is necessary to deliver new infrastructure, including new schools.
- 1.8 As set out in policy LP1, the Council is proposing to direct growth to meet development needs to the five Investment and Growth Areas of Ilford, Crossrail Corridor, Gants Hill, Barkingside and South Woodford and other town centres outside of these locations. These areas are the most accessible locations in the borough with excellent transport links. In the south of the borough, particularly in areas like Ilford and Crossrail Corridor accessibility will further improve with the implementation of Crossrail.
- 1.9 As demonstrated in the supporting evidence base such as 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.
- 1.10 However, there is clearly insufficient brownfield land to meet the borough's full development needs in a sustainable way, as demonstrated in Appendix 1 Development Opportunity Sites Review (LBR 2.06). 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 (see

paragraphs 4.10-4.16 of the Local Plan Spatial Strategy Topic Paper, LBR 1.03) to provide additional land to contribute to meet these development needs. The approach to each aspect of the strategy is summarised in the Topic Paper.

- 1.11 In relation to the Green Belt, policy 7.16 of the London Plan (2016) sets out the Mayor's approach to managing the Green Belt. In terms of plan-making, the Mayor "*supports the current extent of London's Green Belt, its extension in appropriate circumstances and its protection from inappropriate development*".
- 1.12 The supporting text to policy 7.16 goes on to say "*Paragraphs 79-92 of the NPPF give clear policy guidance on the functions the Green Belt performs, its key characteristics, acceptable uses and how its boundaries should be altered, if necessary*". As such, the London Plan expressly incorporates the policies of the NPPF at paragraphs 79-92 including in respect of alteration of the boundaries of the Green Belt.
- 1.13 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 the Local Plan Spatial Strategy Topic Paper (LBR 1.03), 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.
- 1.14 All of the borough's 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 built-up areas;
  - To prevent neighbouring towns from 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".
- 1.15 A number of Green Belt assessments 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 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 studies concluded that the following areas of the borough's Green Belt do not meet the NPPF purposes of the Green Belt and could therefore be released without compromising the purpose and function of the Green Belt:
  - Roding Hospital and surrounding area (parcels GB11b & 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);
  - Billet Road (parcels GB14c).
- 1.16 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.
- 1.17 Of the parcels proposed for release, land at Hainault Fields (Oakfield), King George and Goodmayes Hospital, the Ford Sports Ground and land at Billet Road, all offer sustainable locations to help meet the borough's development needs, as demonstrated through the Sustainability Appraisal (LBR 1.11). They are also located in the five proposed Investment and Growth Areas.
- 1.18 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.
- 1.19 It is important to note here that there is nothing in the London Plan which adopts a different test to that set out in paragraph 83 of the NPPF.
- 1.20 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* (para 85). Based on the findings of the Green Belt Assessment (2016) and Addendum (2017), several small scale boundary amendments are also proposed through the Local Plan to address matter such as historical mapping inaccuracies and errors.
- 1.21 Based on the above, it is clear that the Council has significant development needs which justify it has 'exceptional circumstances' to go into the Green Belt to meet its housing and infrastructure needs.
- 1.22 In addition to 'exceptional circumstances', the Mayor has also indicated in his letter that the Local Plan should explore other opportunities that may realise additional capacity in Ilford and other Investment and Growth Areas without giving rise to the need for any of Green Belt release proposed.
- 1.23 In response to this, the Council reviewed the 'indicative development capacity' of all Development Opportunity Sites in Appendix 1 of the Local Plan (LBR 2.06). The assessment should also be read in conjunction with the Concept Masterplans (LBR 2.78) and the Tall Buildings Study (LBR 2.77). This demonstrates that all brownfield sites within the borough do not offer sufficient development capacity to meet or exceed London Plan minimum targets. Without any Green Belt release, London Plan minimum housing targets cannot be met, let alone exceeded. Furthermore, the

Interim SA Report (LBR 1.11.2) supports this by appraising the Mayor's representation – 'Option 1' illustrating that it would have negative impacts upon townscape and character as well a significant negative effect on education provision, and is thus not considered to be a sound approach.

- 1.24 Aside from the 'exceptional circumstances' point, the Mayor's letter set out some other policy areas (affordable housing, student accommodation) that could benefit from modifications. As such, following Regulation 19 consultation, officers from the Council and the GLA have worked closely on matters raised in the representation with the intention of agreeing some common ground prior to the examination hearings taking place.
- 1.25 As presented in the Proposed Modifications (LBR 1.01.2), the Council is proposing modifications to LP3 Affordable Housing (Mod. 45) which seeks to address the Mayor's concern on maximising affordable housing. At the time of Submission, the Council proposed to insert the word "*minimum*" into LP3.
- 1.26 Subsequent to that and to address the Inspector's question xii) under Issue 5, the Council is proposing a modification to LP3 to increase the overall affordable housing target from 30% to 35%. The Council is of the view that this modification would maximise affordable housing delivery, make a larger contribution to addressing the level of affordable housing and respond to the Mayor's affordable housing aspirations, particularly in relation to the SPG. Please see the Council's response to Issue 5 Question xii) for details of this modification.
- 1.27 In relation to LP4 Specialist Accommodation, the Council's proposed modification (Mod. 50 in LBR 1.01.2) proposes to include a new section in policy LP4 to refer to student accommodation.
- 1.28 The Council is currently seeking agreement on the above specific wording changes with the GLA to address their concerns. The Inspector will be informed in due course how these discussions have progressed.
- 1.29 To conclude, the Council's approach to Green Belt and how it is proposing to manage it is fully in line with the requirements of the NPPF. As mentioned above, London Plan policy 6.17 clearly follows the requirements of the NPPF. The Redbridge Local Plan has set out how it also meets the NPPF requirements in relation to Green Belt. It can therefore be concluded that based on the above, the Council considers the Local Plan is in general conformity with the London Plan.

ii) **Will the strategy satisfactorily and sustainably deliver the new development and infrastructure needed over the plan period?**

- 2.1 Yes. The Local Plan will sustainably deliver the new development and infrastructure needed over the plan period. The NPPF is clear that

boroughs should plan for development needs that go beyond housing needs. Paragraph 157 states that Local Plans should “plan positively for the development and infrastructure required in the area”.

- 2.2 In relation to housing, the Local Plan contains a five year land supply of deliverable housing sites which demonstrates a supply of specific developable sites to provide five years’ worth of housing against the London Plan target of 1,123 homes a year. In accordance with paragraph 47 of the NPPF, and in order to make up for the previous shortfall in housing delivery, the Council has also included a buffer of 20% more homes during the first phase of the Plan. In addition, the Plan contains a housing trajectory that identifies “a supply of specific, developable sites or broad locations for growth for years 6-10 and where possible, for years 11-15”.
- 2.3 In relation to infrastructure, it is clearly the responsibility of the Council to plan positively for the provision of infrastructure to support new development. Paragraph 162 requires that authorities should work with other authorities and providers to assess the quality and capacity of infrastructure such as transport, health, education, social care, and utilities, and its ability to forecast demand.
- 2.4 The National Planning Practice Guidance (NPPG) that supports the implementation of the NPPF explains “a Local Plan is an opportunity for the local planning authority to set out a positive vision for the area, but the plan should be realistic about what can be achieved and when (including in relation to infrastructure) (para 018). 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.
- 2.5 To respond to the NPPG, the Local Plan is supported by an Infrastructure Delivery Plan (IDP) (2017), LBR 2.21 that makes clear for at least the first five years, what infrastructure is required, who is going to fund and provide it, and how it relates to the anticipated rate and phasing of development.
- 2.6 The key infrastructure requirements on which delivery of the plan depends is contained within Appendix 2 of the Local Plan (as modified through LBR 1.01.3 part 2).
- 2.7 The preparation of the IDP involved engagement with Council services and external infrastructure providers, who drew on investment plans and strategies that considered forecast changes to population and household numbers. It is a ‘live’ document and it will be monitored and updated

regularly to identify future infrastructure projects and the associated costs.

- 2.8 Overall, the IDP concludes that the necessary infrastructure has been identified to support the anticipated growth over the plan period. It does however highlight that delivery of education infrastructure, particularly relating to primary and secondary school facilities is essential to enabling sustainable development. The target of 10 new primary school forms of entry and 47 secondary school forms of entry suggests the need for a continued programme of expansions on a temporary and permanent basis. As opportunities for expansion diminish, the delivery of new schools on the identified strategic sites in the Investment and Growth Areas must be prioritised.
- 2.9 In relation to health, paragraph 8.18 of the IDP sets out the key requirements over the Local Plan period, broken down into the four 'Locality Areas'. Ongoing work between the Council and the CCG concludes that future healthcare requirements can be met through a combination of measures including refurbishment and investment in those areas of the existing estate that offer scope for greater utilisation and the provision of some new health facilities.
- 2.10 Finally, Appendix 1 of the IDP identifies a schedule of key infrastructure projects. The costs associated with these are known for Phase 1 of the plan period. As with any list of this nature, and as is anticipated by the NPPF at para.177, there is more certainty and detail regarding infrastructure which is programmed to be delivered in the early part of the plan period. There is nevertheless considered to be at least a "reasonable prospect" that all anticipated infrastructure is deliverable and will be delivered in a timely fashion, as required by the Framework at para.177. The delivery of items beyond this timeframe will be subject to further feasibility and availability of funding.

**iii) *Does the Local Plan strike the correct balance between residential and employment uses?***

- 3.1 The Local Plan strikes the correct balance between residential and employment uses to secure a sustainable pattern of development in the borough. It takes into account evidence of pressing housing need, likely future employment requirements, and the quality of existing employment sites. It also recognises that along with other outer London Boroughs, the Redbridge economy is heavily integrated into the wider London economy; as set out in section 5.3 of the Local Economic Assessment (LBR2.31). An absolute balance between residential and employment uses is therefore

not required given the nature and scale of jobs in Central and inner London.

- 3.2 Based on the findings of the Employment Land Review (LBR2.33), the Local Plan seeks to protect the best quality employment land in the borough– through designation as Strategic Industrial Locations (SIL) and Local Business Areas. Doing so contributes to a balance of land uses which can help minimise journey lengths in accordance with paragraph 37 of the NPPF.
- 3.3 As set out in Local Plan Policy LP14 (as amended through modifications 61-69 of the Schedule of Modifications – document LBR1.01.2):
- Land designated as SIL is protected for B1/2/8 uses, in recognition that residential uses would compromise their function as part of “London’s main reservoirs of industrial and related capacity” as set out in London Plan Policy 2.17;
  - Other well performing industrial estates are designated as Local Business Areas, where intensification of employment uses is supported, and mixed use development should not compromise the ongoing use of the area for business purposes, or provide a net loss in employment space;
  - Better quality office space in the borough is identified and its protection for continued office use through designation as Local Business Areas sought.
- 3.4 In addition to protecting the borough’s better quality existing industrial and office stock, the Local Plan also seeks to secure modern fit for purpose business space such as managed workspace to capture growth in small businesses in the borough and adapt to modern working practices. Doing so is consistent with NPPF paragraph 20 requirements to “plan proactively to meet the needs of business and support an economy fit for the 21<sup>st</sup> century.”
- 3.5 The Employment Land Review (LBR2.33) projects a borough wide minimum need of 21,206m<sup>2</sup> of new employment space over the plan period, which should be aligned with the managed release of up to 14.45ha of poorer quality space to reflect the reshaping of the economy away from industrial activity.
- 3.6 Potential sites for new employment space, as part of mixed use redevelopment of poorer quality undesignated employment land, are identified in Revised Appendix 1 – Development Opportunity Sites (LBR2.06.01). Indicative figures for commercial space are provided, which recognise that such provision will come from residential led mixed use

schemes in accessible locations. Cumulatively these provide enough sites to meet minimum requirements for new employment space as set out in The Employment Land Review (LBR2.33).

- 3.7 The government's deregulation of the planning system has to some extent compromised the Council's ability to strike the correct balance between employment and residential uses. The extension of permitted development rights undermines efforts to protect existing employment areas, whilst future planned reforms such as the brownfield land register also appear to prioritise housing over employment needs. Nevertheless, the Council maintains that the approach set out in the Local Plan seeks to strike a balance between competing needs for land, that is justified by evidence, and can help contribute to a sustainable pattern of development.

**iv) Is the location of development proposed across the Borough justified given that the majority is due to take place in south Ilford?**

- 4.1 The Key Diagram on page 17 of the Local Plan clearly illustrates the development strategy, identifying five Investment and Growth Areas where growth is being directed to over the life of the plan. These are highly accessible locations, well connected to the borough's public transport network. They also offer a range of investment opportunities through identified developable and deliverable sites with substantial capacity to accommodate new homes, jobs and infrastructure.
- 4.2 The location of development proposed across the borough is justified. The SA process undertaken (SA Report, 2016, LBR 1.11) and (SA Interim Report, 2017, LBR 1.11.2) demonstrates it is the most appropriate strategy when considered against reasonable alternatives. Furthermore, it is supported by evidence included within 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).
- 4.3 It is important to point out that the majority of growth is not due to take place in south Ilford. As can be seen from Table 3 of the Local Plan (as amended through the Schedule of Modifications, LBR 1.01.2) Ilford Investment and Growth Areas is accommodating approximately one third of the overall growth over the plan period. This is because the area contains a significant number of available sites with substantial capacity to accommodate development and supporting infrastructure and it has excellent access to public transport. Furthermore, the London Plan (2016) recognises the strategic importance of Ilford through its Opportunity Area

and Metropolitan Town Centre designation. The Housing Zone status recognises the potential for the area to drive an increase in housing supply and capitalise on the arrival of Crossrail.

- 4.4 Similarly, the Crossrail Corridor Investment and Growth Area has capacity to accommodate a further third of the overall growth, owing to the ability of sites to accommodate development and infrastructure.
- 4.5 What is proposed for Ilford and indeed the other four Investment and Growth Areas is considered to be sustainable in a way compatible with the context of the borough.

**v) Is the evidence base adequate in terms of density, population, housing completions, parking, pollution and impact of Crossrail?**

- 5.1 Yes, the evidence base is adequate to justify the Local Plan and its policies.
- 5.2 The NPPF (para 158) requires that the Local Plan should be based on “adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the borough”. “Assessments and strategies for housing, employment and other uses must be integrated and take full account of relevant market and economic signals”. The Council’s Local Plan Soundness Checklist (LBR 1.19) provides more detail on how the Local Plan has been positively prepared which seeks to meet the borough’s objectively assessed development and infrastructure requirements.
- 5.3 The Local Plan is supported by a comprehensive and extensive, up-to-date evidence base which justifies the plan’s strategy and policies. It has been shaped by ongoing consultation and engagement and is underpinned by a suite of technical evidence base to ensure the preferred spatial approach to growth and change is a ‘sound’ one.
- 5.4 In terms of density, the Characterisation Study (LBR 2.75.1 – 2.75.3) provides an understanding of character and context across the borough. It has informed the Local Plan by ensuring growth is directed to the most appropriate areas. The Study and the London Plan Sustainable Residential Quality (SRQ) matrix (Table 3.2 of the London Plan) have been used to assess housing capacity of the sites identified in Appendix 1 of the Local Plan. The London Plan SRQ matrix is based on the consideration of the existing setting/character of an area with the Public Transport Accessibility Level (PTAL) to estimate a site’s housing density (in units per hectare).
- 5.5 The Strategic Housing Market Assessment 2016 (LBR 2.01), and SHMA Update (2017) (CED003) assesses the borough’s full housing needs. The

SHMA identifies the scale and mix of housing and the range of tenures that the local population is likely to meet over the plan period. The latest household and population projections (GLA interim projections 2015) have been used to assess the level of housing need.

- 5.6 In terms of housing completions, the Council, through its monitoring system, provides comprehensive trend data on development activity, including housing completions. It also holds detailed information on schemes in the planning pipeline and other sites with identified potential.
- 5.7 In addition the Council makes use of the housing completion data produced through the London Development Database (LDD). The LDD is the system used by the Mayor to monitor planning permissions and completions across London. The LDD is a valuable source of information on trends in planning and development, and is a vital source of information for both the Council's and London Plan Annual Monitoring Report. This data is also used to inform planning policy.
- 5.8 The Council is due to report on its next AMR in autumn 2017. It will cover the monitoring period 2013/14 to 2016/17.
- 5.9 In terms of parking and transport, the Plan is supported by a Transport Assessment (LBR 2.50) which has considered the impact on the highway network from planned housing growth in the borough up until 2030. A Redbridge Parking Strategy (CED105) which sets out a consistent approach to parking management and provision in the borough.
- 5.10 The evidence base for the impact of Crossrail is dealt with in the station UIS studies listed under Urban Design Evidence Base Documents, and supporting documents to those studies. The impact in these areas relate to increased rail commuter pedestrian flow in the vicinity of the station entrances and how this is accommodated. The source of the additional flow is based on London Plan projections.
- 5.11 An Air Quality Report (LBR 2.62) has assessed the impact air quality in order to review the environmental impact in relation to traffic movements across the local road network and major traffic hotspots.
- 5.12 In addition to the above, the Plan is also supported by a number of other technical assessments. These include the Infrastructure Delivery Plan (2017) (LRB 2.21), the Employment Land Review (2016) (LBR 2.33) and Retail Capacity Assessment (2016) (LBR 2.34), all of which set out the borough's objectively assessed needs. The Plan has also been informed by a Local Plan Viability Assessment and Community Infrastructure Levy Review (LBR 2.11), Green Belt Review (LBR 2.41) and Green Belt Addendum (2017) (LBR, 2.41.1) and an Open Space Study (2016) (LBR, 2.42).

5.13 Finally, other technical assessments have been produced to inform and support the Local Plan. These include a Sustainability Appraisal (2016) (LBR 1.11) and Interim SA Report (2017) (LBR 1.11.2), which incorporates an Equalities Impact Assessment and a Habitats Impact Assessment (2017) (LBR 1.12).