

CED008 Council's Response to Issue 4a (Ilford – Policy 1A)

Issue 4a Ilford Policy 1A

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?

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?

1.1 The Development Opportunity Sites in Ilford are considered justified when compared to other reasonable alternatives and deliverable in the Plan period.

1.2 Detail about the site allocations is considered adequate for Local Plan purposes. Note the Council's response to Inspector's Preliminary Questions in response to the detail about the site allocations use, form, scale, access and quantum of development (see LBR 2.06 and LBR 2.06.1). However, details provided in the Ilford policy box under policy LP1A, set out detailed requirements for homes, employment, retail and other infrastructure in the Ilford area. In terms of deliverability note Council response to Issue 5, question ix.

1.3 A range of growth options have been tested through the Sustainability Appraisal process. In 2016, the Local Plan Sustainability Appraisal (LBR1.11) tested a total of 12 options for growth. These options can be seen in table 6.2 and 6.3 of LBR1.11 This appraisal highlights the pros and cons of each option, and as such informs and supports the Council's preferred strategy. As set out in paragraph 8.2.3 of LBR1.11, particular considerations included that:

- A lower growth option would compromise the achievement of important housing delivery objectives without leading to a plan that performs notably better in terms of other strategic objectives.
- A higher growth approach would help to meet objectively assessed housing needs more fully, but would compromise achievement of other

important objectives (e.g. higher density development would lead to challenges from a community infrastructure delivery perspective).

1.4 In response to representations received on the Pre-Submission Plan, most notably the Mayor that further consideration of town centre intensification was needed before Green Belt release, further reasonable alternatives were assessed in the Local Plan Sustainability Appraisal Interim Report 2017 (LBR1.11.2). As set out in table 2.4 of LBR1.11.2, the SA appraised four reasonable alternatives. The reasonable alternatives (other than the Council's 'preferred' approach – Option 2) 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. This would mean that sites in Ilford need to increase in density from that proposed in the Local Plan to accommodate the required level of housing growth.
- Option 3 - Higher urban densification / GB release - this approach involves both maximising urban densification and releasing an element of Green Belt. This would mean that sites in Ilford need to increase in density from that proposed in the Local Plan to accommodate the required level of housing growth
- 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 the Local Plan. This would mean that sites in Ilford need to increase in density from that proposed in the Local Plan to accommodate the required level of housing growth.

1.5 All reasonable alternative options would result in increasing densities and thus development capacity on sites in Ilford. The SA assessed that 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. Given this, the sites proposed in Ilford (and development capacity assessed) in the Local Plan, are considered to be justified when compared to this alternative option.

1.6 The SA assessed that 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. Given this, the sites proposed in

Iford (and development capacity assessed) in the Local Plan, are considered to be justified when compared to this alternative option.

- 1.7 The SA assessed that 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. Given this, the sites proposed in Iford (and development capacity assessed) in the Local Plan, are considered to be justified when compared to this alternative option.
- 1.8 Sites in Iford are considered deliverable within the plan period having regard to constraints and national policy. The Council considers that the main constraints to the delivery of sites in Iford are:
 - Impact on townscape and character; and
 - Development viability
- 1.9 The Council's approach to tall buildings is set out in LP27. This policy supports tall buildings in Iford Metropolitan Centre. This approach is supported and justified by the Tall Buildings Study (LBR 2.77). Therefore, the approach to sites in Iford is consistent with NPPF paragraph 58 which states that development should, "optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks"; and should respond, "to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation". Iford is the most accessible location in the borough and the Council's approach to sites in Iford is consistent with NPPF paragraph 30 which states that, "in preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport."
- 1.10 In relation to development viability, the Local Plan is supported by the Local Plan Viability Assessment (LBR 2.11). This document concludes that the 'cumulative impact' of policies in the Local Plan will not threaten viability. Therefore, the Council considers that its approach to sites in Iford is consistent with NPPF paragraph 173 which states, "therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other

requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.”

ii) Is the proposed quantum of development justified and would there be a reasonable balance between new homes and retail and employment floorspace?

2.1 The Local Plan provides a reasonable balance between new homes and retail and employment floorspace in Ilford. As set out in Policy LP1A (as amended through modification number 22 in the Schedule of Modifications - document LBR1.01.2), targets for Ilford Investment and Growth Area include:

- 20,000m² new retail floorspace
- 15,000m² new employment floorspace
- 6,000 new homes

2.2 Figures for new retail space within the Investment and Growth Area are justified as they are derived from the Retail Sites Opportunity Assessment (LBR2.35). This identified a capacity in Ilford Metropolitan Centre of over 26,150m². For the purposes of the Local Plan, a lower target has been applied, to take account of recent proposals for site 1 in Revised Appendix 1 (LBR2.06.01), that included lower retail provision than anticipated in document LBR2.35.

2.3 Figures for new employment floorspace within the Investment and Growth Area are justified as they are derived from the findings of the Employment Land Review (LBR2.33), which assessed a number of existing employment areas (designated and non- designated). Whilst this did not identify development quantum's for individual sites, it did make recommendations about where sites merited protection, and where potential for intensification and mixed use development exists. Where mixed use development has been advocated, potential floorspace has been estimated using a 0.25 plot ratio of the site area, or using planning application data/ records of permitted development, where this exists. Where sites have been recommended solely for protection in the Employment Land Review, these have been designated as such in Local Plan Policy LP14 (as amended through modifications 65-69 in the Schedule of Modifications – document LBR1.01.2)

- 2.4 Figures for housing capacity within the Investment and Growth Area are justified as they are based on the London Plan SHLAA methodology, which is set out in The London Strategic Housing Land and Availability Assessment 2013, (LBR2.05). This has been supplemented with further analysis as set out in the Appendix 1 - Development Opportunity Sites Review (LBR2.06), which has included acknowledgement that competing pressures on land in mixed use schemes will reduce housing capacity.
- 2.5 It is worth noting that Ilford is designated as a Metropolitan Centre in the London Plan, reflecting its strategic role as a centre with very good accessibility, significant comparison goods retail, employment, service and leisure functions. It was also identified as a Housing Zone in 2015. As set out in the Local Plan "The Council's ambition is for Ilford to enhance its profile and performance to ensure it remains one of London's leading town centres" (paragraph 3.3.2), and new housing "will occur in higher density mixed use taller buildings with ground and lower floors being used for modern purposed built commercial and retail uses, with housing on the floors above". Given the role of Ilford Metropolitan Centre, the delivery of new housing within and in close proximity to it, is highly sustainable.
- 2.6 Quantum's of new employment and retail space within Ilford Investment and Growth Area represent the largest amounts of such provision in the borough. They also provide a significant contribution towards the borough wide targets that have been informed by the Employment Land Review (LBR2.33) and Retail Capacity Assessment Report (LBR2.34). This reflects the status of Ilford as a Metropolitan Centre, and seeks to enhance the existing employment and retail base of this important centre of local and regional significance.
- 2.7 It is acknowledged that the balance of uses proposed for Ilford in the Local Plan is predicated on most development being mixed use and residential led. This recognises the existing levels of retail, employment and other services in the centre, but also high levels of housing need, and the centres status as a Housing Zone. The proposed quantum of development in the Investment and Growth Area is justified as it conforms with the supporting evidence base of future retail, employment and housing need. It also provides a reasonable balance of uses that takes account of the existing role and performance of the centre, competing pressures on land, and the need to secure new forms of workspace that better align with modern working practices.

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?

- 3.1 Yes, the Local Plan will ensure the provision of sufficient and suitable infrastructure as a result of the proposed growth and regeneration in Ilford.
- 3.2 In relation to education, Table 6B of the Infrastructure Delivery Plan (IDP) identifies the Council's programme for primary school expansion. This planned provision was agreed by Cabinet in October 2016. For the south of the borough, plans are in place to increase Cleveland Road Primary, Gordon Infants, South Park Primary and Al-Noor Primary.
- 3.3 It is important to emphasise that provision which has come on board since the 2012/13 academic year is not yet at full capacity, mainly due to the cohorts moving through the system. As such, the Council is satisfied that it has sufficient provision in place to meet the primary school demand in the short-term, and will be able to deliver further primary provision in partnership with the Education Funding Agency (EFA) through the free-school programme.
- 3.4 Secondary schools typically serve a wider catchment as pupils of that age tend to travel further distances to attend school. In relation to secondary school provision, there are two major expansions planned in Phase 1 of the plan period. These include Ilford County School and Woodford County School (as set out in Table 6C of the IDP). In addition, Ilford County and Woodford County High School each took the additional increases of 60 pupils each in Year 7 from September 2016. Recently, an application was granted for all all-through Atam Academy for 4-19 year olds with additional 52 place nursery south of Redbridge College.
- 3.5 In addition to the above, the Local Plan has identified sites for education use on Ley Street Car Park and Bus Depot, Ilford, Redbridge Enterprise and Ilford Retail Park and Goodmayes Retail Park.
- 3.6 The Council has had an effective education delivery programme in the past, and in the future, is satisfied that it will be able to provide sufficient school places to enable sustainable development.
- 3.7 The borough is sub-divided into four locality areas for health purposes
- Wanstead & Woodford;

- Fairlop;
- Seven Kings; and
- Cranbrook & Loxford

3.8 It is clear from the work undertaken by the Redbridge CCG that additional primary care facilities are required to respond to the needs of a growing population. Areas where investment in new or reconfigured healthcare facilities will be required correlates strongly with areas where population growth is expected to be highest. Within the Cranbrook and Loxford Locality which spans the south and south west of the borough, key investment is required to Loxford Polyclinic to enable better utilisation in the early phases of the plan, as well as provision of a new health hub as part of developments proposed in Ilford Town Centre.

3.9 Although Appendix 2 (as modified in the Schedule of Modifications to Appendix 2, LBR 1.01.3 (part 2)) includes references to the new healthcare requirements for Ilford, the Council considers that policy LP1A would benefit from modification to explicitly set these out. It therefore proposes the following modification to policy 1A:

“Education (*primary and secondary school expansions*) and health (*improvements to Loxford Polyclinic and a new health hub in Ilford Town Centre*)”

3.10 The Council is exploring approaches to delivering sports and leisure facilities, with the key objective being to safeguard leisure and culture by delivering services in new and innovative ways. Going forward and to respond to growth, investment is to be focused on intensification of existing uses and increasing access to this provision. For example, redevelopment of sites around the Town Hall provides the opportunity to create a stronger civic and cultural heart for Ilford. A cluster of uses including civic/ Council services alongside a range of community and cultural/leisure uses will contribute to meeting the demand over the plan period.

3.11 Since April 2015, children’s centres in the borough have been operating a ‘Hub and Spoke’ model of delivery to enable facilities to continue to have access to good quality services within their local areas. In the ‘Hub and Spoke’ structure:

- Hub means that the centre is open to the public from 9am to 5pm or 8:30am to 4:30pm every day of the week. Staff are also based there with a reception cover

- Spoke means that the centre is open to public as and when a session is being run by the Children’s Centre staff or by a partner agency.

3.12 There are currently 17 children’s centres in Redbridge, the location of which by ward is shown in Table 5A of the IDP. As well as population forecasting, the Redbridge Early Years’ Service uses local knowledge of the registered places at maintained nurseries within primary schools, nurseries, pre-schools, independent schools and childminders, alongside submissions from providers on funding returns to measure the capacity of early education provider provision on an ongoing basis. There are no further plans for Children’s centres and increased demand from new development will be met through the existing hub and spoke model with the main (hub) children’s centres supplemented by sessions in other local community settings. This is likely to mean an intensification of delivery in existing and new community facilities rather than bespoke children’s centres.

iv) Would there be adequate capacity for car parking within the Investment and Growth Area?

4.1 Yes, there is capacity for parking in the Ilford Investment and Growth Area. Given the high PTAL rate of 6A throughout Ilford Town Centre most new development would require only minimal parking provision and shared servicing arrangements to function adequately. The policy approach in Local Plan Policy LP22 ‘Promoting Sustainable Transport’ is to deliver a more sustainable transport network that reduces car dependency and encourage more sustainable forms of transport; and work in partnership with TfL and bus service providers to increase the number of routes in the borough. The arrival of Crossrail in 2019 will provide faster journey times and further reduce the need for parking provision within new development in Ilford. This approach is supported by parking standards in the Local Plan, which are maximum standards for areas of the borough that are PTAL 6 (Ilford), of 1 parking space per 5 units and 0 spaces under 5 units. The Council considers that with the level of public transport in Ilford, which is set to be improved with Crossrail, these parking standards are justified.

4.2 The Council’s parking strategy (London Borough of Redbridge Parking Strategy 2015-2020, CED 105) sets out the borough’s plans to maximise the use of its existing car parking.