

CED010 Council's Response to Issue 4a South Woodford - Policy LP1D

Issue 4a

i) Given the number of opportunity sites expected to come forward does South Woodford warrant the designation of Investment and Growth Area?

- 1.1 Investment and Growth Areas are designated because they include key opportunity sites with good mixed use development capacity, a broad range of services and facilities, excellent transport connections in highly accessible and sustainable locations, and a strong daytime and evening economy. Investment and Growth Areas also have town centres that are attractive to shoppers and visitors, with potential for further growth and positive change.
- 1.2 South Woodford is a designated District Centre well served by public transport links to the Central Line, and includes key development sites that offer opportunities for approximately 500 new homes, 1,000sqm of new retail, and 3,500sqm of new employment floorspace, as set out in Local Plan modified Policy LP1D: South Woodford Investment and Growth Area (Modification 29 in the Schedule of Modifications to Redbridge Local Plan LBR1.01.2). Local Plan Policy LP1D sets out the Council's intention to deliver sustainable development by maintaining South Woodford as a vibrant, busy centre with a strong economy that promotes businesses, and by enhancing local heritage, in line with paragraphs 23-27 and 126-141 of the National Planning Policy Framework (NPPF).
- 1.3 The Local Plan also focuses further investment and growth on the business/employment and industrial sites within South Woodford at Woodford Trading & Industrial Estate, Southend Road (Strategic Industrial Location); Raven Road Industrial Estate (Local Business Area); and The Shrubberies, George Lane (Local Business Area), where the aim is to protect and manage business and employment uses.
- 1.4 The Investment and Growth Area designation allows the Council to manage growth in a holistic and comprehensive manner in recognition of the above characteristics.

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?

- 2.1 The South Woodford Investment and Growth Area includes South Woodford District Centre, surrounding residential areas, and existing industrial estates. The town centre provides a diverse daytime and evening economy including a variety of retail and leisure uses, and some successful small business space such as the Shrubberies. The centre is well served by public transport via the Central Line, and a number of bus routes. The wider area is well served by major road connections, and as

such is also home to some successful industrial uses, such as at Woodford Trading Estate and Ravens Road.

- 2.2 The Local Plan provides a reasonable balance between residential and employment uses in South Woodford. As set out in Local Plan paragraphs 3.6.1-3.6.6, the Council's vision is to maintain South Woodford as a successful town centre by allowing for some intensification, whilst preserving and enhancing existing character, and protecting and promoting key business areas. Policy LP1D (as amended through modification number 32 in the Schedule of Modifications - document LBR1.01.2), therefore includes the following targets for South Woodford Investment and Growth Area:
- 500 new homes
 - 1,000m² new retail floorspace, and
 - 3,500m² of new employment floorspace.
- 2.3 In addition to providing new commercial floorspace, the Local Plan seeks to protect important employment sites, based on the findings of the Employment Land Review (LBR2.33). Within the South Woodford Investment and Growth Area, this includes the designation of Woodford Trading Estate as SIL, and Ravens Road and The Shrubberies as Local Business Areas – as set out in Policy LP14 (as amended through modifications 65-69 in the Schedule of Modifications – document LBR1.01.2). The existence and retention of these sites is important in maintaining a balance of jobs and homes for existing and new residents.
- 2.4 In terms of where new employment and retail space will be provided in the Investment and Growth Area, this is clarified through the Revised Appendix 1 Development Opportunity Sites (LBR2.06.1). This identifies new employment and/ or retail space at:
- Marlborough Road and South Woodford Station Car Park (site number 91)
 - Station Estate (site number 93)
 - Southend Road and Maybank Road (site number 95)
- 2.5 Indicative figures provided are based on a plot ratio of 0.25 for employment uses, plus a notional figure of 1000m² of new retail space at Station Estate given its proximity to core retail areas of the town centre. This recognises that such developments will be in the form of residential led mixed use schemes; which will be necessary for new commercial space to be viably delivered in these areas.
- 2.6 The rationale for promoting the above sites for mixed used development, rather than protection as existing areas of employment, is based on recommendations from the Employment Land Review (LBR2.33) that they offer scope for mixed use redevelopment/ intensification. It also acknowledges competing pressures on land, and the opportunity of sites providing sustainable locations for new housing alongside compatible commercial space.

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?

- 3.1 The Local Plan identifies approximately 500 new homes in South Woodford over the plan period. This level of growth can be accommodated by the transport network as demonstrated in the Redbridge Local Plan Transport Evidence 2017 (LBR 2.50). The area is typically PTAL 3-4 so there would be downward pressure on associated parking provision to 60% resulting in increased use of public transport.
- 3.2 Mitigation for this would typically include improvements to footways linking development sites to bus stops and other amenities including South Woodford station. Works would involve footway surfacing, width, crossings and lighting upgrades, cycle infrastructure and travel plans to inform occupants of travel options.
- 3.3 Strategic modelling referred to in the London Infrastructure Plan 2050: Transport Supporting Paper, July 2014 indicates that the Central Line within Redbridge does not suffer from significant overcrowding as trains commence empty in the north of the borough and fill up as they progress south. By the time the trains reach Wanstead/South Woodford all the seats are taken and there is some standing, so it is reasonable to state that transport capacity issues in this part of the borough are not serious enough to restrict the level of development proposed in this area. As these trains leave the borough they start to get busier, with significant crowding through Newham and into central London in the a.m. peak (London Infrastructure Plan 2050: Transport Supporting Paper, July 2014, page 39).
- 3.4 Planned modernisation providing new trains and signaling to the Central Line will increase its capacity by 25% over the plan period that will relieve peak hour congestion further¹. The TfL Business Plan 2017/18 (CED 113) sets out the investment plan for these improvements. Crossrail will provide effective relief to the Central Line in Central London where they both follow a parallel route, which will benefit commuters from Redbridge reaching these destinations.

¹ 'Improving the Trains': tfl.gov.uk, public information webpage.

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?

4.1 Following long standing lobbying from the borough TfL have brought forward an improvement scheme at Charlie Brown's Roundabout that will introduce Toucan crossings on all four approaches. The scheme is currently at preliminary design stage, with a design document being produced for public consultation planned for summer 2017. Implementation should be complete by the end of 2018/19.

4.2 In general terms there is adequate transport capacity to cope with proposed development in South Woodford. The Redbridge Local Plan Transport Evidence 2017 (LBR 2.50, Para. 5.7, table 5-12, ref J22), indicates a reduction in traffic flow at Charlie Brown's roundabout.

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

5.1 There is capacity for 217 cars in South Woodford's five town centre car parks, and a further 157 on available street spaces, which is subject to charges. There is also a free two hour period in the 508 parking spaces associated with the two food superstore car parks which are heavily used by visitors. Any new development will need to provide associated parking for its use or demonstrate available capacity within the above existing amenities through the planning approval process. Given the PTAL rates of 3-4 throughout South Woodford town centre most new development would require less than maximum parking provision, and appropriate servicing arrangements to function adequately. The impact of major development is assessed by transport impact assessments, and any negative impacts mitigated and controlled by new infrastructure and conditions on uses, including operating times, travel plans and service management plans.

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?

6.1 The removal of the term 'landmark building' does not affect housing capacity on the Station Estate site, as set out in modified Local Plan Appendix 1 (Schedule of Modifications to Redbridge Local Plan Appendix 1, LBR 1.01.3 (part 1)).

6.2 Modification 33 has been made in response to representations R00108/14, R00416/10, R01203/14 (LBR 1.01.1), which stated that the term 'landmark building' at para. 3.6.5 of the Local Plan implied or encouraged the development of a tall building. The justification for responding to representations and making modification 33 is to remove any ambiguity regarding the Council's objectives for the site at Station Estate, which

include achieving a high quality, mixed use development on the site. The Local Plan also proposes the removal of the existing Tall Building Zone designation for the site in the Redbridge Borough Wide Primary Policies (2008), a proposal supported by the 'Tall Buildings in Redbridge: Evidence Base' Study (2017) (LBR 2.77).

vii) ***Should Station Estate be earmarked for specialist accommodation for the elderly? What is the status of the adopted brief?***

7.1 Development on the site at Station Estate will be required to incorporate a mix of uses, which could include community uses/residential institutions in Use Class C2. As such accommodation for the elderly is not excluded as a possible or appropriate use for the site, provided a need for such a use can be demonstrated, in line with Local Plan Policy LP4 'Specialist Accommodation', which supports specialist housing where it is needed to meet a demonstrable need within the borough.

7.2 Whilst the adopted planning brief for Station Estate (April 2015; CED 104) is not a supplementary planning document it is a material consideration for any current planning applications relating to the site. Upon adoption of the Local Plan the planning brief will be updated to reflect the Plan's policy approach and spatial strategy (as reflected through the Schedule of Modifications to Redbridge Local Plan, LBR 1.01.2, Modification 7).

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?***

8.1 Yes, the Local Plan will ensure the provision of sufficient and suitable infrastructure required as a result of the proposed growth and regeneration in South Woodford.

8.2 With regard to education the Infrastructure Delivery Plan (LBR 2.21, Feb 2017) includes plans for expansion at Nightingale School in South Woodford; the expansion of Woodford County High School by 2 Forms of Entry, the equivalent of 420 additional places. In relation to health in South Woodford the Infrastructure Delivery Plan and the Redbridge Primary Care Infrastructure Capacity Plan (LBR 2.22, Redbridge Clinical Commissioning Group, March 2017) contains plans for a new Health Hub at Wanstead Hospital in a central location close to the South Woodford growth area, and improvements to South Woodford Health Centre. The Infrastructure Delivery Plan (LBR 2.21, Feb 2017) also contains plans for enhanced sports facilities at Ashton Playing Fields, and a new Swimming Pool at Wanstead. Due to the level of proposed growth in South Woodford, the infrastructure planned for the area will satisfactorily meet the increased demand.

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?

- 9.1 The key sites within South Woodford are considered to be justified when compared to other reasonable alternatives - they are large sites in highly accessible, sustainable locations, and access to excellent public transport (Central Line). The sites have good development capacity, offer a range of investment opportunities for new homes, jobs and infrastructure and are not in highly constrained locations. Whilst the area is sensitive in terms of its character, it is a suitable location for intensification, provided new development is well designed, and in a form and scale that is appropriate to the local context, in line with the Council's 'Tall Buildings in Redbridge: Evidence Base' Study (2017) (LBR 2.77).
- 9.2 Other reasonable alternatives for development in South Woodford, other than the preferred option in the Local Plan, have been considered and tested in the Local Plan Sustainability Appraisal (SA) 2016 (LBR 1.11), and the Local Plan Sustainability Appraisal Interim Report 2017 (LBR1.11.2). The Local Plan Sustainability Appraisal (SA) 2016 (LBR 1.11. pages 18-26) tested 12 options with 11 reasonable alternatives, eight were higher growth options, three of which included higher growth options for the west of the borough, including South Woodford. The findings show that higher growth options in the South Woodford area would perform poorly in delivering adequate community infrastructure, and would have a negative impact on townscape/local heritage assets, when compared to the preferred option in the Local Plan. Lower growth options in the SA did not include reduced housing numbers on brownfield land in the west of the borough as this was not considered as a reasonable alternative.
- 9.3 The Local Plan Sustainability Appraisal Interim Report 2017 (LBR1.11.2) was undertaken in response to representations received on the Pre-Submission Plan. It tested 4 options, including 3 reasonable alternatives for higher growth in South Woodford. The findings of this appraisal, as set out on page 33, show that the preferred option for the Local Plan performed better than the reasonable alternatives, with higher growth options for South Woodford again having a negative effect on community infrastructure provision and local townscape/character.
- 9.4 The key sites at South Woodford are considered deliverable within the Plan period having regard to constraints and national policy. The constraints on the key sites at South Woodford are related to site viability, and the scale, form and the design of development given the attractive, traditional local character. These constraints can be addressed through Local Plan policies relating to built form and design (LP26 'Promoting High Quality Design'; LP27 'Tall Buildings').
- 9.5 The Council's plans for South Woodford are consistent with Section 2 of the National Planning Policy Framework (NPPF) in terms of ensuring town centre vitality. Local Plan policies aim to be positive, create stronger town

centre economies, promote the environment, and manage town centre growth over the plan period. The objective is to encourage a more competitive town centre, recognising that residential development can play an important role in ensuring prosperity.

- 9.6 Details regarding site allocations in South Woodford are considered adequate for Local Plan purposes. With reference to the Council's response to Inspector's Preliminary Questions regarding the detail about the site allocations use, form, scale, access and quantum of development (LBR 2.06.1, Revised Appendix 1). Details provided in modified Policy LP1D 'South Woodford Investment and Growth Area' (Modification 29 in the Schedule of Modifications to Redbridge Local Plan LBR1.01.2), and Revised Appendix 1, set out detailed requirements for new homes, and mix of uses. Appendix 1 was revised in order to bring it in line with paragraphs 002 and 010 of the National Planning Policy Guidance and to provide clear and sufficient detail on individual site requirements. It provides clearer guidance on how mix of uses should be settled.