

## **CED012 Council's Response to Issue 5**

### **Issue 5**

***Are the policies for housing growth and affordable housing (Policies LP2 & LP3) justified, deliverable and consistent with national policy?***

#### **Questions:**

**i) Has the Council done all it can, in co-operation with other Boroughs and Districts, to identify previously-developed land, including that in neighbouring authorities including Epping Forest District, before releasing Green Belt land for development?**

1.1 The Council considers that it has done all it can, within the requirements of the London Plan and NPPG, to identify previously developed land.

1.2 Paragraph 4.9 of the Duty to Cooperate Statement (LBR 1.14) sets out the Council's position in regards to meeting borough and sub regional Objectively Assessed Need (OAN).

1.3 The Council has relied principally upon identification of previously developed land within the London Strategic Housing Land Availability Assessment (SHLAA) 2013 (LBR 2.01) and supplementary work set out in LBR 1.01.3 and LBR 2.06.1.

1.4 The SHLAA assessment was led by the Mayor and undertaken on a regional basis, in collaboration with all London boroughs (including those neighbouring Redbridge). In regards to the geographical area an assessment should cover, NPPG paragraph 007 (Reference ID: 3-007-20140306) states that the area selected for the assessment should be, "the housing market area and functional economic market area". London is considered to be a single housing market area and in this regard is justified in being the area for identification of previously developed land for housing. This collaborative approach resulted in a single London SHLAA being produced, removing the need for each authority (or groups of neighbouring boroughs/Districts) to prepare an individual SHLAA for their own area(s). Where sites in the SHLAA 2013 were considered to be suitable, viable and developable they have been allocated within the Local Plan.

1.5 All reasonable opportunities for development on previously developed land will also have been taken forward by neighbouring authorities and Districts through the development of their Local Plans prepared in conformity with the NPPF. Havering consulted on a Regulation 18 version of the Local Plan in 2015 and is preparing to consult on their Submission Draft (Reg 19) Local Plan for 2017. Barking and Dagenham consulted on an Issues and Options consultation in 2015 and is now preparing a Regulation 18 consultation for 2017. Epping Forest consulted on a Regulation 18 version of the Local Plan in 2016 and is preparing a submission draft (Reg 19)

Local Plan in 2017. Neighbouring local authorities will therefore be relying on brownfield land within to meet their development needs.

- 1.6 As set out in the Duty to Cooperate Statement (LBR 1.14), the Council have explored whether neighbouring authorities can assist in meeting Redbridge's outstanding needs. Neighbouring authorities have stated that they are not in a position to do this as they, like Redbridge and in accordance with national planning policy, are relying on, in the first instance, brownfield land to meet their own OAN. Therefore, there are no opportunities in neighbouring boroughs on previously developed land which are capable of being used to meet Redbridge's development needs.
- 1.7 As set out in answers to Inspector's preliminary questions (CED 001) on Objectively Assessed Need (ii) and Issue 1 (ii), Epping Forest does not form part of either the London market area or the Outer North East London Market Area. Through Duty to Cooperate discussions, Epping Forest indicated that it was unlikely to be able to meet its own OAN. This is essentially due to existing 'constraints' in Epping Forest District e.g. 95% of the District is designated as Green Belt, which significantly limits land supply in the District meaning there is insufficient previously developed land to meet its OAN. Therefore, with insufficient previously developed land to meet its own need, it is not in a position to meet any of Redbridge's outstanding need. Moreover, Epping Forest District can reasonably be anticipated to be relying to the fullest extent as practicable on any opportunities for brownfield development to meet its own development needs. Given that District's position in terms of not being unable to meet in full their own needs, brownfield opportunities there will not be available to meet any of the development needs of Redbridge.
- 1.8 Other sources of previously development land have been included in LBR 1.01.3 and LBR 2.06.1 included rolling forward undeveloped sites which have been allocated within the currently adopted Local Development Framework, Development Sites with Housing Capacity DPD, Ilford Town Centre AAP, Crossrail Corridor AAP and Gants Hill AAP.
- 1.9 In addition to the above, through the various consultations undertaken in preparing the Local Plan, a number of sites (including previously developed land) have been 'promoted' for allocation. Where sites have been assessed as 'deliverable' or 'developable' they have been included for allocation within appendix 1. It should be noted that this process has continued through the Regulation 19 consultation, with modifications to appendix 1 (LBR 1.01.3 and LBR 2.06) proposing a further twelve sites on previously developed land. In terms of housing supply the number of new homes (including windfall) proposed on previously development land in the borough is 16, 007, approximately 85% of the borough's total capacity. The total homes proposed on non-previously developed land (i.e. existing Green Belt) is 2,765 new homes, approximately 15% of the borough's capacity. This demonstrates that the majority of housing is proposed on previously developed land.

**ii) Should housing need be assessed on a London-wide basis or within the Outer North East London housing market area?**

- 2.1 Paragraphs 4.3 – 4.7 of the Duty to Cooperate Statement (LBR 1.14) set out the Council’s position with regards to the market areas and how OAN should be assessed. In addition, note answers to Inspector’s preliminary questions (CED 001) on Objectively Assessed Need (ii) and Issue 1 (ii).
- 2.2 The London Plan 2016 is a strategic plan which sets the housing requirements for the whole of London, based on London comprising a single market area. The London Plan sets minimum housing targets for each individual London Borough, including Redbridge, derived from the Mayor’s SHMA (CED 109), which itself considers the housing needs of the whole of London based on a single housing market area. Those targets are set out at table 3.1. Having regard the strategic nature of the London Plan and the statutory requirement for the submitted local plan to be in general conformity with it, it is therefore the London Plan table 3.1 that is the source for setting the borough’s housing need which the Local Plan seeks to achieve and exceed. The London Plan, including within policy 3.3 and at para.3.19 of the accompanying text, acknowledges that housing need, when considered on a more local basis within a London borough, may differ from the London Plan targets for that borough. The London Plan does not expect this locally assessed need to be met in full, but rather that individual local plans should seek “close the gap” between the London Plan target and locally assessed housing need. However, from this requirement to “close the gap” it does not follow that the housing need for the Borough is other than that derived from table 3.1 of the London Plan.
- 2.3 As such, for the purposes of the Local Plan, housing need has been assessed at both London wide and within the Outer North East London housing market area. The Council acknowledges that it forms part of both the wider London housing market area and the Outer North East London housing market area. Both market areas have had their level of housing need assessed. The London wide market area’s OAN is assessed in the Mayor’s Strategic Housing and Market Assessment (2013), whilst the sub-regional Outer North East London housing market area has been assessed in the Outer North East London SHMA 2016 (LBR 2.01). A copy of the Mayor’s Strategic Housing and Market Assessment 2013 will be submitted to the Examination (CED 109).
- 2.4 It should be noted that the examining Inspector on the Further Alterations to the London Plan (FALP) accepted that individual boroughs should not have to assess their own housing need (See paragraph 18 onwards of his report - CED 106). This position lead to some initial confusion, as whilst the wording of this report was accepted by the Mayor of London, it did not result in any modification or changes to the FALP, in particular policy 3.3. However, the Mayor’s position was clarified and confirmed in the Mayor’s Housing SPG 2016 (CED 108). Paragraph 3.2.11 sets out how boroughs should proceed in assessing their housing needs.

2.5 Therefore, to ensure that the Council addressed the Mayor's Housing Supplementary Planning Guidance, the Council jointly commission (with neighbouring authorities) the Outer North East London Strategic Housing Market Needs Assessment 2016 (LBR 2.01). The Outer North East London SHMA 2016 (LBR 2.01) is compliant with the requirements of the National Planning Policy Framework and Guidance, as well as the Mayor's methodology ensuring consistency of approach. The GLA provided peer review input as well as London-wide guidance on the preparation of the Outer North East London Strategic Housing Market Needs Assessment 2016 (LBR 2.01) in the context of the London Plan / Mayor's Strategic Housing and Market Assessment 2013.

2.6 In terms of addressing housing need, the Local Plan meets the requirements of policy 3.3 by achieving and exceeding the minimum target for the Borough derived from London Plan Table 3.1, and thereby seeking to "close the gap" on locally identified housing need. By achieving and exceeding the London Plan target for the Borough, the submitted local plan meets the requirement of the London Plan policy 3.3D . However, in order to address policy 3.3Da and paragraph 3.2.11 of the Mayor's Housing SPG, the Council undertook the Outer North East London Strategic Housing Market Needs Assessment 2016 (LBR 2.01). The Council has addressed the housing need identified through LBR 2.01 by identifying capacity and allocating land for development in excess of the London Plan minimum target in order to "close the gap" of assess OAN, in accordance with London Plan policy 3.3Da.

**iii) Is the minimum housing target of 16,845 justified having regard to the aim in The London Plan to "close the gap" to objectively assessed need and the expectation in Table 3 (as modified) (LBR 1.01.3) that 18,936 dwellings will be delivered during the plan period?**

3.1 The proposed minimum target of 16, 845 new homes is justified based on the following reasons:

3.2 The Council has addressed in response to the previous question (ii) the issue of the housing need and explained that that consists of the minimum target derived from London Plan policy 3.3 and table 3.1. The London Plan is also legally part of Redbridge's Development Plan and the Local Plan is required to be in general conformity with it. The minimum housing target of 16, 845 is derived from the London Plan (2016) and therefore this is properly set at the borough's housing target within the submitted Local Plan, not least to ensure 'general conformity' with the London Plan.

3.3 As set out in table 3 (modified), it has been estimated that the borough has capacity to provide approximately 18,936 new homes (including

windfalls). The identified capacity demonstrates that there is sufficient capacity in the borough to meet and exceed its minimum London Plan housing target, as is required by the London Plan. Additional housing capacity, above the minimum London Plan housing target, has been identified, which in accordance with policy 3.3 of the London Plan (2015) would contribute to exceeding this target and closing the gap between identified housing need and supply in line with the requirement of the NPPF. In particular, the London Plan (2016) specifically states in policy 3.3 that boroughs "*should seek to meet and exceed minimum borough annual average housing targets*" and augment "*with extra housing capacity to close the gap between identified housing need and supply in line with the requirement of the NPPF*". In addition, paragraph 3.19, states that this target should be treated as a "*minima*". The proposed target of a minimum 16, 845 new homes, with clear ambition to meet and exceed this target through the identification of additional housing capacity is fully justified and in conformity with the approach set out in the London Plan 2016.

**iv) What is the justification for the inclusion of an allowance of 2,700 dwellings from windfall sites given that paragraph 5.16 of the London Strategic Housing Land Availability Assessment (LBR 2.05) indicates that dependence on windfall capacity should be minimised?**

- 4.1 NPPF paragraph 48 states that, "Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens."
- 4.2 The allowance of 2,700 dwellings from windfall has been justified based on the London Strategic Housing Land Availability Assessment (LBR 2.05) methodology as set out in paragraph 2.69 – 2.72. As stated in paragraph 2.69, "the approach to assessing future housing yield from small sites is based on extrapolating historic trends drawing on data from the Local Development Database (LDD) on housing completions from 2004/05-2011/12 forward. The time series of 2004-2012 provides a robust basis for such a trend as it covers a full market cycle, providing a realistic average for the plan period. The sources of supply from small sites includes change of use, new build, and conversion, thereby reflecting trends such as conversions of houses into flats and infill development."
- 4.3 Appendix 7 of the London Strategic Housing Land Availability Assessment (LBR 2.05) sets out small site contributions for each London Borough. With regards to Redbridge the London Strategic Housing Land Availability Assessment (LBR 2.05) calculates a yearly average of 270 units per year. Given that this supply will come from 'unallocated' sites it is considered to be justified for inclusion as 'windfall' within the housing trajectory.

4.4 As set out in paragraph 3.8.9 of the Local Plan, the Council has not relied on windfall in the first phase of the Local Plan, meaning windfall will not be relied upon in its five year land supply. The focus in the first five years of the plan is on delivery of allocated Development Opportunity sites. It is only in the second and third phases of the Local Plan that reliance on windfall housing is included, demonstrating how the Council has sought to minimise reliance on it.

v) **Will the Local Plan provide a 5 year supply of deliverable sites with an appropriate buffer in accordance with paragraph 47 of the National Planning Policy Framework? Is this on track for the first phase of the Plan from 2015-2020? How is any shortfall in delivery over that period to be addressed? Will the policies in the Local Plan ensure the on-going availability of a 5 year supply?**

5.1 Table 3 and figure 12 of the Local Plan set out the Council’s five year land supply trajectory. In accordance with the housing target set in the London Plan 2016 the Council should aim to deliver a minimum 5, 615 new homes in the first five years of the Local Plan. Paragraph 47, bullet point 2 states that, “Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land. In regards to this, as Figure 12 shows, from 2010 to 2015, a total of 1,796 homes were built in the borough which resulted in a shortfall of 2,004 homes based on the Council’s previous housing target (760 homes per year) set out in the London Plan (2011). Therefore, the Council has sought to deliver 20% more homes in the first five years of the Plan. With the inclusion of the 20% buffer, the Council should aim to provide a minimum of 6, 738 homes (5,615 + 1,123). It should be noted that no windfall have been included in the first five years of the Local Plan. The Council propose to deliver a total of 6, 848 new homes in the first phase of the Local Plan which is above the minimum target of 6, 738 homes which demonstrates the Council’s five year supply with appropriate buffer.

5.2 The following tables sets out the number of completions in the borough over the last two financial year and compares it to the proposed plan target:

Table 1: Completions in financial years 15/16 and 16/17

Financial year	Number of completions	Minimum LP target	+ /- proposed minimum target
FY 15/16	685	1,123	- 438
FY 16/17	862	1,123	- 261
<b>Total</b>	<b>1,547</b>	<b>2,246</b>	<b>- 699</b>

5.3 The latest planning data shows that over the last two financial years the Council is 699 homes below the proposed minimum target. However, it should be noted that in the housing trajectory the Council anticipated that

it would not be until the end of the first phase of the plan that delivery would exceed the LP minimum target. The trajectory reflects Local Plan paragraphs 3.3.1, 3.3.8 and 3.4.1 that the delivery of Crossrail in 2019 will be a catalyst for change and significant growth in the later part of phase 1. In addition, sites included in the Ilford Housing Zone (see paragraph 6 below) will start to be delivered further increasing housing supply within the later part of the first phase of the Local Plan. The trajectory is considered to be robust and reliable.

- 5.4 To assist delivery, the Council will take a positive partnership approach to implementation through a combination of private sector investment, working with government agencies, other agencies and bodies and development and delivery of its own strategies and initiatives.
- 5.5 The Council recognises that it has not historically placed sufficient emphasis on the importance of building relationships with investors and developers to encourage development within the Borough. This has resulted Redbridge's relatively low profile within the sector, which is in sharp contrast to the experiences of neighbouring Boroughs with similar housing targets.
- 5.6 The Council has prioritised raising its profile and building relationships as a mechanism to encourage development in the Borough in support of the Council's growth ambitions. This has included, among other things, direct dialogue with the promoters of larger developments, establishing the Redbridge Housing Association Group (made up of the active housing associations within the Borough) and working directly with the GLA and the G15 – the grouping of the largest Registered Providers in London – to encourage their investment within the Borough.
- 5.7 To facilitate private sector led development activity, the Council has continued to support improvements in performance in Development Control. As well as reviewing the pre-application process to ensure all the necessary discussions and policy considerations are undertaken prior to the submission of a planning application, the Council has increased capacity within the department, to ensure that the Council is able to respond effectively to developers as they progress schemes through the planning system.
- 5.8 The Council takes a proactive approach to developer and land owner engagement. Where sites have 'stalled' the Council will contact site owners/developers to understand why. Where specific factors can be identified, Regeneration, Property and Performance teams will seek to work with the site owner/developer to identify ways in which development can be 'kick-started'. Going forward, the Council is also prepared, where necessary and appropriate, to adopt a flexible policy approach when development viability issues have been demonstrated. This flexibility will

generally be considered through the application of the affordable housing policy. The Council's flexible approach is set out in LP3.

- 5.9 The Council will consider the production of detailed planning briefs and/or Supplementary Planning Documents to further promote sites for development. Such documents can provide developer with more confidence to invest in sites in order for them to come forward for development.
- 5.10 Much of the Council's effort in working with the private sector is focussed on Ilford which the Council secured a Housing Zone designation for in 2015 on the basis of delivering over 2,000 new homes, including 500 affordable homes, by March 2021 as part of a £500m programme. The Council is actively working with the Government and Greater London Authority (GLA) to provide funding to accelerate or unlock new housing development and is anticipating that the designation will continue to drive an increase in housing supply in the area and capitalise on the arrival of Crossrail. To date, the Housing Zone has facilitated the development of schemes on the Britannia Music Site (354 units, commencing July 2017), Paragon Heights (144 units, on site) and Valentines House (122 units, on site). The Council is also currently considering two significant applications within Ilford and has held pre-application discussions with a range of other parties.
- 5.11 To further focus efforts and continue raising the profile of Ilford the Council has worked with local stakeholders to develop a Manifesto (CED 110) for the town which sets out eight simple commitments that will shape and guide the regeneration of the Town Centre, attract investment and encourage new economic activity. The Manifesto's aims include the delivery of thousands of new homes, jobs and services, transforming the leisure and cultural offer and harnessing Crossrail which will further enhance Ilford's status as a well-connected place to live.
- 5.12 The delivery of Crossrail in 2019 will be a catalyst for change and significant growth in the borough. Local Plan paragraphs 3.1.1, 3.3.1, 3.3.8 and 3.4.1 set out how Crossrail will secure significant investment and opportunities in the borough. The implementation of Crossrail is anticipated to significantly increase the supply of housing in the borough, particularly in the Ilford and the Crossrail Corridor Investment and Growth Areas.
- 5.13 The Council is building on the Manifesto with the immediate production of a Development Prospectus which articulates a physical response to those commitments. The Manifesto was launched to an audience of 100 developers and investors (many of whom were not already active in the town) in May 2017 and received an excellent response with a much increased level of interest in the town from within the sector. The Council will continue to identify opportunities to build the profile and develop

relationships with credible developers who can increase the supply of high quality housing.

- 5.14 Outside of the work with the private sector, the Council has also recognised the importance of maximising the use and value of its own property portfolio – much of which lies within the Investment and Growth Areas – to increase the supply of housing within the Borough. The main element of this is the establishment of a wholly owned development company to bring forward residential led, mixed use development on Council owned land. This was initially approved by members in April 2016 and is the subject of a full Business Case due to be considered by Cabinet in July 2017. The initial proposals include the development of three existing, Council owned sites which would collectively deliver c.350 new homes within the first phase of the Local Plan. However, it is anticipated that supply through the Development Company will continue to build as the Council reviews its operational estate and rationalises the number of buildings it uses in response to changes to services and funding levels.
- 5.15 Alongside the work to establish the development company, the Council has already made good use of the freedoms provided under the Housing Revenue Account (HRA) self-financing agenda which was introduced in 2012 to develop an affordable housing programme. To date, this programme has seen the commitment to the delivery of 150 new homes for affordable rent across eight sites. The Council is currently reviewing its HRA asset base to identify the potential for further new homes which could be provided through a mixture of infill development, site intensification and estate renewal. Whilst it will not be possible to deliver all of these homes through the HRA and, as a result, it is not possible to fix a timescale for their ultimate delivery, it can reasonably be assumed that a significant proportion of them will be brought forward through the lifetime of the Local Plan.
- 5.16 The Council is currently in the process of drafting a Housing Strategy and supporting Action Plan. The Housing Strategy will provide a clear statement of the Council's aspirations for housing in the borough. A key theme of the Housing Strategy will be increasing housing supply. The Housing Strategy will set out a range of proposals and mechanisms which will increase the supply and affordable housing provision in the borough.
- 5.17 Answer to question ix should also be noted.
- vi) **Having regard to the SRQ matrix in The London Plan (Table 3.2) has the Council made reasonable assumptions about densities that can reasonably be achieved at opportunity sites given that paragraph 3.84 of the London Strategic Housing Land Availability Assessment (LBR 2.05) indicates that outer London Boroughs may**

**have to encourage higher density development to help meet their pressing needs?**

- 6.1 The Council considers that it has made reasonable assumptions about densities with regards to the SRQ matrix in the London Plan (Table 3.2). The Council approach to setting indicative capacity of each individual Development Opportunity site, including assumptions about densities, is set out in LBR 2.06.
- 6.2 Densities proposed on Development Opportunity sites are considered reasonable and have been applied, with reference to the SRQ matrix in the London Plan (Table 3.2), after careful consideration of sites PTAL and the character of the surrounding area in accordance with the London Strategic Housing Land Availability Assessment (LBR 2.05) methodology.
- 6.3 Within this context, the maximum reasonable density has been applied to each Development Opportunity site in order to deliver homes to help meet the Council's pressing housing need.

**vii) Are the assumptions and analysis in Appendix 1 of the Development Opportunity Sites Review (LBR 2.06) reasonable and realistic? Is this assessment sufficiently comprehensive?**

- 7.1 The assumptions and analysis in Appendix 1 of the Development Opportunity Sites Review (LBR 2.06) are reasonable and realistic and sufficiently comprehensive.
- 7.2 The first source of information to support the assumptions and analysis made in relation to sites in appendix 1 is up-to-date planning information, such as recent planning applications. Through the planning application process, a detailed technical site/development assessment has been undertaken which would assess factors such as PTAL, character of existing area/context and individual site constraints to support proposals put forward in planning applications. Approved planning applications have been consulted on and rigorously assessed to determine their suitability.
- 7.3 Where sites do not have up-to-date planning information, the Council has undertaken a comprehensive assessment as set out in Appendix 1 of the Development Opportunity Sites Review (LBR 2.06).
- 7.4 The housing capacity of each Development Opportunity site has been assessed using the London Plan Sustainable Residential Quality (SRQ) matrix (Table 3.2 in London Plan). The London Plan SRQ matrix is based on consideration of the existing setting\character of an area with the Public Transport Accessibility Level (PTAL) to estimate a sites housing density (in units per hectare u/Ha).

PTAL Assumptions and Analysis

- 7.5 In order to establish the PTAL for each site the Council has used Transport for London's (TfL) WebCat planning tool which auto generates PTALs for

locations in London. This system ascribes a PTAL score to all locations in London based on walking distance from public transport. A scale of 6b (highly assessable e.g. close to train station and bus routes) and 1 (poorly accessible e.g. far from train station and or bus routes) is set by the system. Each site was assessed in the system to determine the PTAL for each site. Where PTAL changed across a site an average PTAL score would have been ascribed. For example a large site with a PTAL of 4 to the north of the site which reduced to a PTAL of 2 to the south of the site would be given an average PTAL score of 3.

#### 'Setting' Assumptions and Analysis

- 7.6 Table 1 of LBR 2.06 sets out how the Council has generally defined the character of each site. Sites character has been assessed against the definitions of 'settings' ('Central', 'Urban' and 'Suburban') set out in the London Plan (2016), under table 3.2.
- 7.7 In general, the key determinants which define an areas 'setting' are the character of the existing area and built form and the distance from a Metropolitan, Major or District Town centre.
- 7.8 In considering the character of the borough, the Council has referenced the Redbridge Characterisation Study (LBR 2.75.1 – 3). This document provides an understanding of character and context and variation across the borough. Section 4 – Urban typologies defines common types of development found within the Borough and categorises these into primary and secondary typologies. Section 5 – Character Areas explains how the urban area of Redbridge has been divided into eighteen character areas with reference to shared physical characteristics, physical boundaries and an understanding of association and sense of place. The urban typologies described in section four are identified within each character area and each area is analysed in terms of its extent, history, prevailing character and challenges. In addition the Tall Building Study (LBR 2.77) also includes a Local Townscape analysis.
- 7.9 Appendix 1 sets how typologies and distance from town centres has been justified for specific areas of the borough.

#### Density Ranges Assumptions and Analysis

- 7.10 The SRQ matrix (table 3.2 of the London Plan 2016), sets out density ranges for multiple PTAL levels (i.e. 0-1, 2-3 and 4-6) and for different habitable rooms per unit. Each character area is divided into three based on the range of habitable rooms per hectare; the SHLAA (2013) uses the mid-range - 3.1-3.7 habitable rooms per hectare.
- 7.11 The defaults assume that areas with high PTALs in central and urban settings can deliver a greater number of one and two bed units and thus are set near the top of the 3.1- 3.7 habitable rooms per ha range and areas in lower PTALs are assumed to deliver more family sized units and thus set nearer the lower end.

- 7.12 Using the assessed PTAL and Character for each Opportunity Site the Council has applied this to table 2 – Standard density assumptions and table 3 – town centre density assumptions in LBR 2.06 (these density assumptions are taken from the SHLAA 2013 methodology (LBR 2.05) to determine a sites reasonable density.
- 7.13 This density range is then multiple by the area of the development opportunity site to determine indicative housing capacity.

#### Assumptions in Constraints and Mix of Uses

- 7.14 Once the above process has been undertaken, site ‘constraints’ where then considered. Certain ‘constraints’ can reduce ‘probability’ and thus overall housing capacity. The impact of specific ‘constraints’ on probability are set out in table 4 of LBR 2.06. The impact of ‘constraints’ on ‘probability’ is in accordance with the SHLAA 2013 methodology. Whilst each site may have its own constraints the following example is provided. Site 76, 674 – 700 High Road, Seven Kings, is ‘constrained’ as the Level 2 Strategic Flood Risk Assessment has identified the site is at risk of some flooding. In addition, the site is also ‘constrained’ as it is in multiple ownerships. Given this analysis, probability was reduced by 10% due to flood risk and 10% due to multiple site ownership (in total 20% from 100% to 80%) to account for these ‘constraints’ on the sites potential development capacity.
- 7.15 In addition to ‘constraints’, in order to meet wider development needs, a number of sites are proposed for a mix of uses. Therefore, the Council has sought to apply the site specific findings/conclusions of the Employment Land Review (LBR 2.33), Retail Site Opportunities Assessment (LRR 2.35) and Infrastructure Delivery Plan 2015 – 2030 (LBR 2.21) to identified sites. The Council recognise that an important balance needs to be struck between delivering homes as well as other development needs. Therefore, where sites are identified for a mix of uses, ‘probability’ has been reduced by 10% for each proposed use. For example, site 4, Deport Mill Road, Mill House, is a site which has been proposed for both housing and employment uses. This site has been identified in the Employment Land Review as having the potential to accommodate approximately 2,600 sq.m of employment floorspace. Probability on this site has been reduced by 10% (from 100% to 90%) to ensure that the proposed indicative site capacity accounts the provision of employment floorspace.
- 7.16 Finally, Concept Masterplans (LBR 2.78) have been prepared for the Billet Road, King George and Goodmayes, Ford Sports Ground and Oakfield sites (Strategic Green Belt Release Sites). These set out how the proposed level of housing and other important infrastructure uses could be accommodated on each site. It provides a comprehensive analysis of site constraints and context and proposals within them are considered to be reasonable and realistic.

**viii) Will the 2km buffer zone around the Epping Forest SAC affect the deliverability of developments within that area? What mitigation measures are likely to be possible?**

8.1 The 2km buffer zone will not affect the deliverability of developments within that area. Mitigation measures need not be financially onerous in terms of per-dwelling contributions to open space provision or SAC management, and can be scaled in proportion to the size of properties and consequent likely scale of effect.

8.2 As explained in paragraph 5.3.6 of the HRA screening report (LBR 1.12), developments within the 2km buffer zone would have the option of implementation of measures such as Suitable Alternative Natural Greenspace (SANG), contribution to management of open space and Green Infrastructure, or a contribution to visitor management measures in Epping Forest where accessibility to alternative greenspace cannot be improved. This means there would not be any difficulties in delivery in circumstances where the provision of on-site or near-site open space would be impractical.

8.3 Paragraph 5.3.7 of the HRA report explains why mitigation requirements for Epping Forest SAC do not have to be as exacting as those required for Special Protection Areas (SPAs), where avoidance of bird disturbance is the key issue. One example is the fact that disturbance from dog-walking is not a critical issue in Epping Forest (unlike SPA sites), so SANG provision does not necessarily need to be tailored specifically to the needs of dog walkers.

8.4 It is also possible to tailor per-dwelling contributions to the size of the property, so small flatted developments do not have to contribute the same as a large family home. This approach recognises that the likely effect on visitor numbers and potential disturbance in the SAC is a function of population growth rather than housing units.

8.5 To summarise, the available mitigation measures for a proposed development could include either:

- provision of SANG within or accessible from the development;
- financial contribution to development and / or management of Green Infrastructure accessible from the development; or
- financial contribution to visitor management measures in Epping Forest SAC.

**ix) Are the sites relied upon for the supply of housing deliverable and developable in accordance with paragraph 47 of the National Planning Policy Framework?**

9.1 The Council considers that the sites relied upon in the Local Plan are deliverable and developable in accordance with paragraph 47 of the NPPF.

- 9.2 Within LBR 2.06.1 proposed Opportunity Sites are phased to provide an indication of when they can be expected to be completed.
- 9.3 The NPPF defines sites to be deliverable, if they are considered to be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Deliverable sites for housing include those that are allocated for housing in the existing development plan and sites with planning permission (outline or full that have not been implemented) unless there is clear evidence that schemes will not be implemented within five years.
- 9.4 Of the 61 sites in phase 1 (2015 – 2020) of LBR 2.06.1, 35 have planning permission with no known reasons that prevent the site being developed out. 10 sites have been sites promoted by landowners or developers who specifically state that sites are expected to be completed in the first phase of the plan. 5 sites are considered to be subject to developer interest with a planning application likely soon. 5 sites are in Council ownership with a planning application likely soon. 17 sites in phase 1 form part of the Mayor’s Housing Zone. 26 sites within phase 1 of the Local Plan are currently allocated in the Council’s existing Development Plan.
- 9.5 To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be developed at the point envisaged. Sites in phase 2 are generally not allocated within the existing development plan or have planning permission or a recent prospect of coming forward for development. However, it should be noted that Sites within phase 2 are considered to have no significant constraints (e.g. infrastructure) to overcome. Of the 74 sites in phase 2, 52 sites are allocated within the Council’s existing Development Plan. 10 sites in phase 2 form part of the Ilford Housing Zone.
- 9.6 Sites in phase three are considered to be ‘constrained’ (e.g. provision of infrastructure on sites or re-provision of existing uses on site) but which can be overcome to ensure a reasonable prospect that the site will be available and could be developed later in the plan period. 3 sites are currently allocated within the Council’s existing Development Plan.
- x) Is there sufficient flexibility within the allocations to accommodate unexpected delays whilst maintaining an adequate supply?**
- 10.1 The Council’s Housing trajectory illustrates that the bulk of supply is expected to be delivered in the first ten years of the plan period. Therefore, if any more significant delays were encountered, there would still be time within the plan period for recovery and delivery as planned based on normal economic cycles.

- 10.2 It is considered that the Local Plan is flexible enough to adapt to rapid change as the overall strategy does not hinge on the delivery of one particular site(s). Indeed, the identification of additional housing capacity beyond the minimum London Plan target ensures that if some sites do not come forward for development there is still a sufficient capacity to maintain an adequate supply to meet and exceed the London Plan target.
- 10.3 Note answers to question v, paragraphs 4 – 16, for initiatives and mechanisms proposed which will increase housing supply in the borough and overcome delays in delivery.
- 10.4 In addition, if necessary, the Green belt release sites at King George and Goodmayes and Billet Road (a total of approximately 1,300 new homes) could be brought forward for development earlier in the plan period as these sites have fewer site constraints and are currently being promoted for development by the land owners. In addition, there is also scope to accelerate the delivery of Council owned sites if necessary.
- 10.5 The Council continually updates its development monitoring information and keeps performance against targets under regular review to allow changing patterns in delivery to be identified quickly and responded to accordingly.

**xi) How would the supply of housing sites be monitored and managed? Does the Local Plan contain a housing implementation strategy?**

- 11.1 The Council has a long established development monitoring system which provides comprehensive trend data on development activity in the borough and detailed information on schemes in the planning pipeline and other sites with identified potential. As required by the NPPF, the Council monitors supply of deliverable sites on an annual basis, with housing trajectory data published in the AMR. The Council maintains an up-to-date five year supply, conducting a thorough assessment of whether sites are available, suitable, achievable and viable in terms of housing delivery.
- 11.2 In addition the Council provide monthly returns to the Mayor of London through the London Development Database (LDD). The LDD is the system used by the Mayor to monitor planning permissions and completions across London. It has been running since 2004. 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.
- 11.3 The Local Plan in section 7 details how the Council will review performance against targets and identify the need to review policies, consider alternative strategies or take other appropriate management action through the AMR in order to secure delivery of the spatial vision should this becomes necessary.

11.4 The Local Plan does not currently contain a housing implementation strategy; however, as noted in mod 42 (LBR1.01.2), the Council will be producing an update Housing Implementation Strategy to support implementation of the plan.

**xii) What is the rationale for the minimum strategic affordable housing target of 30%? Does this respond adequately to the objectively assessed need for affordable housing, the Viability Assessment (LBR 2.11), The London Plan and the aspirations of the Mayor of London?**

12.1 The Council propose the following modification in response to the above question. LP3 1 is proposed to be amended to state:

The Council will seek to maximise the provision of affordable housing in the borough by setting a minimum strategic affordable housing target of ~~30%~~ **35%**.

12.2 The Council propose the following modification to LP3 1 (d) to state:

Proposals will need to provide a viability assessment in order to justify the level of affordable provision on each site should proposals be below the **minimum** ~~30%~~ **35%** policy requirements.

12.3 The Council propose the following modification to paragraph 3.9.6 to state:

The Council aims to maximise every opportunity to deliver affordable housing in accordance with London Plan policy 3.12 – Negotiating Affordable Housing **and the Mayor’s affordable Housing and Viability SPG (2016)**.

12.4 The level of objectively assessed affordable housing (CED003) over the plan period is 12, 500 or 833 homes per year. The above modification will increase the level of affordable housing sought on new housing schemes and make a larger contribution to addressing affordable need in the borough.

12.5 The Council’s past performance in terms of affordable housing delivery is set out below:

Table 2 – Completions in Redbridge by financial year

Financial Year	13/14	14/15	15/16	Total
Total C3 completions	438	685	862	1,985
Number / % affordable	18 / 4%	256 / 37%	103 / 12%	377 / 19%

- 12.6 As it can be seen from the table above the Council has delivered approximately 19% of new homes as affordable over the last three financial years. Its best performing year was 14/15 when it delivered 37% of homes provided as affordable. The Council has therefore only once met and exceeded the proposed new affordable housing minimum target in the last three years.
- 12.7 The Council has now considered the Mayor's Draft Affordable Housing & Viability SPG 2016 (CED107) and, after further discussions with the Mayor, proposes the above modifications to bring the Local Plan in line with the Mayor's aspirations for affordable housing as set out in the SPG.
- 12.8 The SPG provides a framework for delivering the maximum reasonable amount of affordable housing in the context of current London Plan policy (3.11 and 3.12) and past delivery. This SPG introduces a 'threshold approach', whereby schemes meeting or exceeding 35 percent affordable housing without public subsidy are not required to submit viability information. Schemes that do not meet this threshold or require public subsidy to do so will be required to submit detailed viability information which will be scrutinised and treated transparently. In addition, comprehensive review mechanisms will be applied to schemes that do not meet the threshold or require public subsidy to do so, in order to ensure that affordable housing contributions are increased if viability improves over time.
- 12.9 Please note Modification 27 (LBR 1.01.2) which states, "All schemes are expected to maximise the delivery of affordable housing and make the most efficient use of available resources to achieve this objective in accordance with the London Plan (2016) and the policies of this Plan. In accordance with the Mayor's Draft Affordable Housing and Viability SPG (2016), the Council will ensure affordable housing delivery is maximised from all sources, by considering a variety of funding and design solutions such as use of grant, RP's own funding and innovative funding models to increase the overall number of affordable homes".
- 12.10 Para 173 of the NPPF requires Local Plans to be deliverable and states that, "the sites and 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". With regards to this the Local Plan Viability Assessment and Community Infrastructure Levy Review (LBR 2.11), the Council has sought an update to 'test' the impact on viability of the proposed modified 35% housing target. The results of the reappraisal indicate that the proposed modified target of 35% should be deliverable on sites that are expected to come forward over the life of the Development Plan.

12.11 It is the Council's view that the rational set out above; 1) is in accordance with London Plan policies 3.11 and 3.12 to maximise affordable housing delivery; 2) makes a larger contribution to addressing the level of affordable housing need in the borough; 3) it is a realistic target when compared to the Council's past affordable housing delivery; 4) respond to the Mayor's aspirations, particularly in relation to the SPG; and 5) will not threaten the viability of development coming forward.

**xiii) Following a High Court judgment the Written Ministerial Statement of 28 November 2014 regarding section 106 obligations is now national policy. This provides that due to the disproportionate burden of contributions on small-scale developers, for sites of 10-units or less, and which have a maximum combined gross floor space of 1,000 square metres, affordable housing and tariff style contributions should not be sought. Accordingly should Policy LP3 be adjusted to refer to 11 homes or more?**

13.1 The Council acknowledges that National Planning Policy Guidance (NPPG) has been amended to reinstate the policy that affordable housing should not be sought from developments of 10 or fewer homes. However, departure from this element of NPPG is justified in Redbridge for the following reasons:

13.2 The Court of Appeal's judgement indicates that a local planning authority can propose a lower threshold below that in national policy where justified by evidence and local circumstances. In particular, the Court of Appeal stated (EWCA Civ 441 paragraph 26) that: "if in future an LPA submits for examination local plan policies with thresholds below those in the national policy, the Inspector will consider whether the LPA's evidence base and local circumstances justify the LPA's proposed thresholds. If he concludes that they do and the local plan policy is adopted, then more weight will be given to it than to the new national policy in subsequent decisions on planning applications."

13.3 The London Plan 2016 states in Policy 3.13 that affordable housing should normally be required from sites which have capacity for 10 or more homes. The London Plan forms part of the Council's Development Plan. The Local Plan has therefore sought to be in conformity with the threshold set out in the London Plan (2016).

13.4 The Outer North East London SHMA – Update (CED003) assesses the borough's affordable housing need to be 12, 500 over the plan period or 833 homes per year. Consequently, due to the high affordable housing need, it is appropriate for the Local Plan, in order to maximise affordable housing provision, to seek affordable housing from a wider number of development opportunities.

13.5 The Redbridge Local Plan Viability Assessment and Community Infrastructure Levy Review (LBR 2.11) assessed a range of sites across the borough. This report tested the ability of a range of developments

identified in Local Plan to be viably developed over the plan period. The study takes account of the cumulative impact of the Council's current planning requirements, including testing a range of affordable housing percentages. The assessment tested a range of sites with differing housing capacities. This included sites below a 10 unit threshold. The report found that it is viable to seek affordable housing contributions (and CIL) from developments of fewer than 10 homes. Therefore, the threshold proposed in LP3 is consistent with advice contained in the Viability Study.

**xiv) What is the reason for including reference to the capacity of a site in Policy LP3? How is this to be assessed?**

14.1 The Council has the responsibility to maximise the delivery of both housing and affordable housing in the borough. The Local Plan is proposing a threshold that development of 10 units or more should provide an element of affordable housing. Experience from officers dealing with planning applications is such that applicants can propose development which underutilises a sites development capacity in order to fall under this threshold so as to not provide affordable housing. Where such instances are considered to occur, the inclusion of the word 'capacity' within LP3 enables the Council to seek justification from applicant as to the level of development proposed.

14.2 In general terms, the capacity of a site would be assessed using the London Plan Sustainable Residential Quality (SRQ) matrix (Table 3.2 in London Plan). The London Plan SRQ matrix is based on consideration of the existing setting\character of an area with the Public Transport Accessibility Level (PTAL) to estimate a sites housing density. This is then applied to the proposed site area giving an indicative site capacity.

**xv) Has the Council considered increasing the total housing figures in order to help deliver the required number of affordable homes in accordance with the PPG (ID 2a-029-20140306)?**

15.1 Note answer to xii and proposed modification to increase the minimum affordable housing target.

15.2 The Council has considered the option of increasing the overall housing target in order to deliver additional affordable dwellings. The Council has concluded that a further uplift in overall housing target is not a realistic option.

15.3 Paragraph 1.54 of the NPPF indicates that Local Plans should be aspirational but realistic. The overall target for additional dwellings in the Local Plan represents a substantial increase compared with past delivery, and a significant further uplift could not realistically be delivered. As can be seen in question xii, paragraph 6, table 2, an average of 661 homes per year have been completed in the last three financial years. The Council's proposed target represents an increase of almost 41% on the level of completions in the last three years and the Council therefore considers the proposed target to be the highest realistic target.

- 15.4 The Local Plan sets a plan target of 16, 845 homes and 5, 896 additional affordable homes (as modified). The proposed target of 5, 896 (as modified) represents a shortfall of 6,604 when compared to the need of 12,500 additional affordable homes as identified in the Outer North East London SHMA update (CED003). Assuming a 35% affordable target, a total of approximately 36, 000 homes would have to be delivered to meet the overall affordable housing need. This would be an increase of approximately 52% on the existing proposed target. The Council considers that increasing the overall housing target to this level would be unsustainable or could not be realistically delivered. As set out in the Sustainability Appraisal 2017 (LBR 2.05), four reasonable development alternatives were considered and assessed. Of these four reasonable development alternatives, option 3 - Higher urban densification / Green Belt release and option 4 - Higher urban densification / Higher Green Belt release, would deliver more housing (21,378 and 23,106 homes respectively). However, as the appraisal of these options demonstrates, whilst both would be beneficial in terms of delivering increase levels of housing, they 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. The Sustainability Appraisal 2017 (LBR 2.05) demonstrates that increasing the level of housing will have a number detrimental effects and increasing the level of housing beyond that proposed in the Local Plan would be unsustainable.
- 15.5 In addition, the targets in the London Plan 2015 were introduced by the Further Alterations to the London Plan (FALP). The Inspector who examined the soundness of FALP recognised that there are severe constraints on the capacity to increase overall housing delivery across London, and accepted an overall housing target that is unable to meet the identified need for housing or affordable housing. The Inspector also concluded that boroughs housing targets would be constrained stating that, "the SHLAA identifies most of the existing capacity and, effectively, through the SHLAA, the FALP has determined the extent to which individual Boroughs can contribute to meeting the strategic need for housing across London. Within the confines of the FALP's strategy there is little scope to do more" (CD5.6 paragraph 21). The Inspector who examined the soundness of FALP report also accepted that the London Plan's affordable housing target should be set at a deliverable figure even though such a target would fall short of need. He states, "the Mayor acknowledges that the FALP target falls short of the need for 25,600 affordable dpa [dwellings per annum] identified in the SHMA. There are calls to increase the target and to require developers to accept higher proportions of affordable houses but the target must be realistic and viable and plans must be deliverable...However, I am satisfied that the assessment demonstrates that the 17,000 dpa [dwellings per annum] target can be achieved without putting the delivery of housing at risk" (CD5.6 paragraph 44).

15.6 The judgement in the case of Borough Council of Kings Lynn and West Norfolk v Elm Park Holdings is also relevant. Paragraph 32 of the judgement is clear that the requirement within the NPPF to meet housing need in full does not include a requirement to meet affordable housing in full.

**xvi) Does the Local Plan adequately address the needs for all types of housing (excluding affordable housing) and the needs of different groups in the community as set out in paragraph 159 of the National Planning Policy Framework?**

16.1 The Local Plan adequately addresses the needs of all types of housing and needs of other groups in the community. Policy LP3 – Affordable housing encourages self-build and custom build, supporting people wishing to build their own home. Policy LP4 – Specialist Accommodation promotes and manages specialist housing, addressing the needs of older people, vulnerable people and the homeless. Policy LP5 – Dwelling Mix, specifically seeks to provide and increase the number family sized units provided by new development, addressing the needs of families with children. LP 32 – Sustainable Design and Construction – Part 4 (c) requires new build to meet Building Regulations M4 (2) ‘Accessible and Adaptable Dwellings’ and M4 (3) ‘Wheelchair User Dwellings’, addressing the needs of people with disabilities and further meeting the needs of older people. Policy LP8 – Gypsies and Travellers, aims to meet the needs of the gypsy and traveller community.

**Appendix 1** – Justification for general ‘settings’ in application of densities on Development Opportunity Sites.

<b>On Areas of the Borough</b>	<b>Typologies</b>	<b>Distance from Metropolitan, major and District centres</b>	<b>General setting applied</b>
Ilford	<p>Core (relatively intense development. Development is almost always denser within the core than the surrounding hinterland).</p> <p>Urban Terrance (the houses are arranged in long linear terraces of up to 20 or more unit, and are typically two storey, very occasionally two and half or three storeys in height).</p> <p>Ilford also contains the highest building heights in the borough, including the tall Pioneer Point building close to Ilford station;</p>	Ilford is designated as a Metropolitan town.	Sites in Ilford and are therefore generally considered ‘central’ in character.
Crossrail Corridor	<p>Core (relatively intense development. Development is almost always denser within the core than the surrounding hinterland).</p>	The District centre of Chadwell Heath and Local centres of Seven Kings and Goodmayes are located with the Investment and Growth area.	Sites in the Crossrail Corridor are therefore generally considered ‘urban’ in character.

	<p>Big Box (Low density. Single storey with surface car parking. Big box development is often considered the least efficient land use in terms of maximising the potential of the land/ development sites).</p> <p>Urban Terrance (the houses are arranged in long linear terraces of up to 20 or more unit, and are typically two storey, very occasionally two and half or three storeys in height).</p>		
Gants Hill	<p>Core (relatively intense development. Development is almost always denser within the core than the surrounding hinterland. Gants Hill contains a number of 10 story plus buildings).</p> <p>Suburban (Building heights are almost completely two storeys, groups of bungalows are relatively common and three storey units are seen very occasionally).</p> <p>Gants Hill has taller and denser built</p>	Gants Hill is designated as a District centre.	Sites in Gants Hill are therefore generally considered 'urban' in character.

	<p>form than the majority of the surrounding context, focused entirely around the junction and along the main roads.</p>		
<p>South Woodford</p>	<p>Core (relatively intense development. Development is almost always denser within the core than the surrounding hinterland).</p> <p>Flats (There are a variety of forms and no dominant architecture. Blocks are typically 3 or 4 storeys in height).</p> <p>Urban Terrance (the houses are arranged in long linear terraces of up to 20 or more unit, and are typically two storey, very occasionally two and half or three storeys in height).</p> <p>Suburban (Building heights are almost completely two storeys, groups of bungalows are relatively common and three storey units are seen very occasionally).</p> <p>South Woodford has some locally</p>	<p>South Woodford is designated as a District centre.</p>	<p>Sites in South Woodford are therefore generally considered 'urban' in character.</p>

	tall buildings along the North Circular, and some larger shed developments in the south-east of the area.		
Barkingside	<p>Core (relatively intense development. Development is almost always denser within the core than the surrounding hinterland).</p> <p>Campus (Generally low to medium intensity, but can vary. Buildings typically contained within landscape.)</p> <p>Suburban (Building heights are almost completely two storeys, groups of bungalows are relatively common and three storey units are seen very occasionally).</p> <p>A concentration of slightly taller (generally no more than four storeys) buildings along the High Street with retail and commercial uses.</p>	Barkingside is designated as a District centre.	Sites in Barkingside are therefore generally considered 'urban' in character.
Wanstead	Core (relatively intense development. Development is	Wanstead is designated as a District centre.	Sites in Wanstead are therefore generally

	<p>almost always denser within the core than the surrounding hinterland).</p> <p>Suburban (Building heights are almost completely two storeys, groups of bungalows are relatively common and three storey units are seen very occasionally).</p>		<p>considered 'urban' in character.</p>
Snaresbrook	<p>Flats (There are a variety of forms and no dominant architecture. Blocks are typically 3 or 4 storeys in height).</p> <p>Urban Terrance (the houses are arranged in long linear terraces of up to 20 or more unit, and are typically two storey, very occasionally two and half or three storeys in height).</p>	<p>Snaresbrook is located within 800m of Wanstead District Centre.</p>	<p>Sites in Snaresbrook are therefore generally considered 'urban' in character.</p>
Hainaut	<p>Suburban (Building heights are almost completely two storeys, groups of bungalows are relatively common and three storey units are seen very occasionally).</p> <p>Suburban Terrace (suburban terrace streets are usually terraced houses,</p>	<p>Not within 800 metres of Metropolitan, Major or District Centre.</p>	<p>Sites in Hainault are therefore generally considered 'suburban' in character.</p>

	the vast majority of which are two storeys high).		
Woodford Green	<p>Grand Suburbs (Grand suburbs almost entirely contain detached houses which vary from 2 – 3 storeys in height).</p> <p>Suburban (Building heights are almost completely two storeys, groups of bungalows are relatively common and three storey units are seen very occasionally).</p>	Not within 800 metres of Metropolitan, Major or District Centre.	Sites in Woodford Green are therefore generally considered 'suburban' in character.