

LONDON BOROUGH OF REDBRIDGE
Examination of Redbridge Local Plan 2015-2030

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Dear Ms Whelehan

REDBRIDGE LOCAL PLAN 2015-2030 UPDATE

1. As indicated at the hearing session on 15 June 2017 I am setting out here the current position regarding the examination following completion of weeks 1 and 2 of the hearings. I shall also refer to certain matters where further clarification would be of assistance.
2. I confirm that week 3 of the hearings will commence on 18 July 2017 in line with the hearing programme issued on 6 April 2017 (IED003). Agendas for the hearings in week 3 will be issued by the end of the week commencing 10 July 2017.
3. The Council has previously produced a schedule of modifications to the Local Plan (LBR 1.01.2). It is also proposing further changes to the Plan as indicated in its hearing statements. Furthermore, I understand that it is considering further alterations due to matters that arose during the first two weeks of hearings. In order to assist all participants it has agreed to produce an updated version of this document by 30 June 2017.
4. Matters where it has agreed to look at further revisions to the Plan include wording to ensure that infrastructure provision is undertaken where made necessary by new development; confirming that development capacity in Policy LP3 will be assessed having regard to the matrix in The London Plan; giving clarity that Opportunity Sites will be developed in accordance with Appendix 1 (as revised); setting out how policies will secure, where relevant, mixed use developments and consideration of whether further detail is required about the "compensatory measures" referred to in Policy LP39.
5. In addition, I requested further factual updates regarding the preparation of consultation statements in 2011 and 2013; a response to the housing figures produced by the representative of Crest Nicholson; details of the status of the Old Parkonians Association as a party to a statement of common ground (CED023) and an update of the position regarding a site at Swithin's Farm (R1215). My understanding is that a response to these matters should also be available by 30 June 2017 but could the Council please advise if this is incorrect and indicate when they will be forthcoming.
6. There are three more substantive matters to address.
7. The Council has produced a revised Appendix 1 (LBR 2.06.1) which seeks to give detail about the form, scale, access and quantum of the individual major Opportunity Sites. This is accompanied by updated lists of major sites (CED015) and of allocated smaller sites (CED016) which also briefly explains the reasons for any modifications. Table 5 of the Development Opportunity Sites Review

document (LBR 2.06) sets out, amongst other things, the densities and the “probability” percentages that have been applied to each site in order to arrive at the indicative capacities.

8. In order to ensure that the schedules of sites are robust the Council should review them again in order to address matters raised at the hearings. These include whether sites have been allocated to a suitable phase of the Plan bearing in mind the passage of time and the site circumstances and constraints. In particular, reference was made to 6 unspecified sites in Phase 1 where there is no planning application or developer interest and hence these sites may not be deliverable as referred to by footnote 11 of the National Planning Policy Framework. Sites that do have planning permission should normally be considered deliverable and the Council should also check whether these have been phased appropriately. Furthermore, sites 4, 5 and 7 were highlighted where there would appear to be impediments to delivery in the form of existing uses that need to be re-provided elsewhere. The Council should also check that there are no other sites where similar factors apply and that expectations regarding phasing are therefore realistic.

9. Where no planning permission exists, site capacity has been assessed by applying fixed percentages to any known constraints in order to inform the “probability” of achieving the standard and town centre density assumptions derived from The London Plan. Whilst this method has been taken forward from the London SHLAA (LBR 2.05) it needs to be applied individually based on local site circumstances. To this end, a more sensitive approach than the blanket imposition of a 10% reduction would appear likely to be more realistic in some instances noting that Table 4 of LBR 2.06 refers to reductions of up to 50%. To this end, I ask the Council to justify the percentage reductions that have been used. Furthermore, the Council should reassess the capacity of sites without planning permission where other uses are proposed or required such as education, health, employment or retail. Ideally this should be based on the likely land-take of those non-housing uses and if sites are affected by flooding any calculation of capacity should relate to the extent of the site affected.

10. Sites 5, 36, 38, 39 and 67 were specifically highlighted during the hearing discussion but similar principles apply to the other major sites throughout the Borough. In addition, some sites (such as site 39) appear to have multiple constraints including other site specific factors such as heritage, relationship to neighbours and multiple ownerships that may not all have been taken into account.

11. The Council should also ensure that the site numbering in all current documents refers to the original system used in Appendix 1 of the Local Plan.

12. Secondly, on Day 2 of the hearings the Council indicated that the matter of whether there is spare capacity for development within the adjoining Boroughs within the Outer North East London Housing Market Area had been explored and that the answer was that there was not. Reference was made to the duty to co-operate statement (LBR 1.14). However, could the Council clarify the sections it relies on in this regard? According to Appendix 1 the Boroughs of Barking and Dagenham, Newham and Havering expect to be able to meet their objectively assessed need but there is no indication of how this relates to the London Plan housing target or whether there might be surplus land available for development within the areas of those authorities.

13. Finally, the Playing Pitch Strategy (LBR 2.43) seeks to establish whether there is sufficient playing pitch provision in the Borough currently and also to meet future requirements to 2030. In so doing, the Strategy has looked at the impact of the potential loss of the playing pitch sites at Oakfield and Ford Sports Ground. Whether there would be a deficiency of provision for both adult and junior football and cricket pitches is set out in a series of tables for sub areas and for the Borough as a whole. In various places the Strategy refers to the undertaking of feasibility studies to consider the replacement of the pitches at Oakfield and Ford Sports Ground. However, it is unclear whether the findings about the overall level of provision took into account the loss of those existing pitches and what assumptions were made, if any, about replacement provision.

14. Furthermore, the Action Plan within the Playing Pitch Strategy refers to all the potential replacement sites (Hainault Recreation Ground, Forest Road, Goodmayes Park Extension and Seven Kings Park) as making some kind of provision in their own right. On the face of it, this might not be possible if these sites are required as replacements for Oakfield and Ford Sports Ground.

15. I therefore seek clarification of the overall position regarding the surplus or deficiency of playing pitch provision for football and cricket in the relevant sub area and across the Borough as a whole in the event that:-

- i) Oakfield and Ford Sports Ground are not developed for housing;
- ii) Only Oakfield is developed for housing;
- iii) Only Ford Sports Ground is developed for housing; and
- iv) Both Oakfield and Ford Sports Ground are developed for housing.

16. I appreciate that the first and third of these matters, in particular, will require further work to be undertaken. In the first instance I therefore request that the Council indicates when it might be in a position to respond.

David Smith

INSPECTOR

27 June 2017