



The Planning Inspectorate

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# **Report to the Council of the London Borough of Redbridge**

**by David Smith BA(Hons) DMS MRTPI**  
**an Inspector appointed by the Secretary of State**  
**Date 24 January 2018**

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Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

## **Report on the Examination of the Redbridge Local Plan 2015-2030**

The Plan was submitted for examination on 3 March 2017

The examination hearings were held between 6 June and 20 July 2017

File Ref: PINS/W5780/429/10

## **Abbreviations used in this report**

AAP	Area Action Plan
AQAP	Air Quality Action Plan
AQMA	Air Quality Management Area
GLA	Greater London Authority
HRA	Habitats Regulations Assessment
IDP	Infrastructure Delivery Plan
IGA	Investment and Growth Area
LDS	Local Development Scheme
MALP	Minor Alterations to The London Plan
MM	Main Modification
NPPF	National Planning Policy Framework
PPG	Planning Practice Guidance
PPS	Playing Pitch Strategy
PTAL	Public Transport Accessibility Level
RLP	Redbridge Local Plan 2015-2030
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SCI	Statement of Community Involvement
SHLA	Strategic Housing and Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SINC	Site of Importance for Nature Conservation
SPG	Supplementary Planning Guidance
WMS	Written Ministerial Statement

## **Non-Technical Summary**

This report concludes that the Redbridge Local Plan 2015-2030 provides an appropriate basis for the planning of the Borough provided that a number of main modifications are made to it. The Council has specifically requested me to recommend any main modifications necessary to enable the plan to be adopted.

All the main modifications were proposed by the Council and were subject to public consultation over a six-week period. Their inclusion in the plan is recommended after considering all the representations made in response to the consultation on them.

The main modifications can be summarised as follows:

- Deleting the strategic housing allocations at Oakfield and Ford Sports Ground as, having particular regard to playing pitch provision, exceptional circumstances do not exist to warrant altering the Green Belt boundary;
- Updating the information on housing supply and the detail about Opportunity Sites to reflect further work undertaken by the Council;
- Confirming the status of the indicative housing capacities for individual Opportunity Sites;
- Increasing the target for affordable housing to 35%; and
- Changing detailed policies relating to town centres and employment, promoting and managing growth, the green environment, achieving quality design and managing and enhancing assets so that they are justified, consistent with national policy and effective.

## Introduction

1. This report contains my assessment of the Redbridge Local Plan 2015-2030 (RLP) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the plan's preparation has complied with the duty to co-operate. It then considers whether the plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (NPPF) (paragraph 182) makes it clear that in order to be sound, a local plan should be positively prepared, justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the Council has submitted what it considers to be a sound plan. The Pre-Submission Draft of the RLP is the basis for my examination. This is the same document as that published for consultation in July 2016 under Regulation 19 of the Town and Country Planning (Local Planning)(England) Regulations 2012 (as amended).

## Main Modifications

3. In accordance with Section 20(7C) of the 2004 Act the Council requested that I should recommend any main modifications (MMs) necessary to rectify matters that make the plan unsound and thus incapable of being adopted. This report explains why the recommended MMs are necessary. All of them relate to matters that were discussed at the hearings or raised during the examination process. They are referenced in bold in the report and are set out in full in the Appendix.
4. Following the examination hearings, the Council prepared a schedule of proposed MMs and carried out sustainability appraisal of them. The MM schedule was subject to public consultation between 16 October and 27 November 2017. I have taken account of the consultation responses in coming to my conclusions in this report and have adjusted the wording of some of the main modifications in the interests of clarity. One of them is not being recommended. None of these changes significantly alters the content of the modifications as published for consultation or undermines the participatory processes and sustainability appraisal that has been undertaken.

## Policies Map

5. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting the RLP for examination, the Council provided a policies map (LBR1.03) and a schedule of policies map modifications (LBR1.02) showing the changes that would result from the proposals in the plan. An updated written schedule of modifications to the policies map to reflect the proposed MMs was published in October 2017.
6. The policies map is not defined as a development plan document in statute and so I do not have the power to recommend main modifications to it. However, some of the MMs recommended in the report require corresponding changes to be made to the policies map. Therefore in order to comply with the legislation and give effect to the plan's policies, the Council will need to update the policies map on adoption so that it includes all the alterations within the recommended MMs.

## **Consultation**

7. Section 20(5)(a) of the 2004 Act requires that I consider whether the Council has complied with their statement of community involvement as set out in Section 19(3). In addition, Regulation 18 of the 2012 Regulations states that local planning authorities must take into account any representation made to them during the preparation of a local plan.
8. The Statement of Community Involvement (SCI) was adopted in May 2006 (LBR1.15) and its objectives are in paragraph 1.4. Preferred engagement techniques for development plan documents are set out in Figure 1. Whatever other statements are made in the SCI, paragraph 2.2.3 confirms that this is the community engagement proposed to be undertaken for local plans. It involves a range of methods rather than an expectation that every one of them will be used. Nevertheless, the evidence in the Consultation Statement (LBR1.13) indicates that the relevant actions listed were taken during milestones 1-5 in Figure 1. Whilst no separate consultation statements were produced in 2011 and 2013 the Council has confirmed (CED035) that the outcomes were reported to the LDF Advisory Committee and published online.
9. The main complaint is that the majority of residents in south Ilford were unaware of the emerging plan until late in the day in 2016 and that concerns from those in that area have been deliberately downplayed. There is also criticism of the content and wording of some of the media used. Whilst the public notices in the press are unlikely to have caught people's attention the leaflets are plain that views are sought about the future of Redbridge. The Consultation Statement also explains how the various comments made have informed the plan. Whilst ultimately this process may not have produced the desired result as far as some are concerned this does not mean that those views were ignored. The Council has simply reached a different view having gone through a long process of assessing various options.
10. Every consultation process could be improved upon and it is clearly unfortunate if some people feel that they have been by-passed or were unaware of the plan and its specific proposals. This is particularly difficult in Redbridge where there are 'hard to reach' groups and those requiring translation services. However, there is no requirement to consult with everyone likely to be affected by a local plan in a certain way. Consequently I am satisfied that the broad expectations of the SCI and the Regulations have been complied with.

## **Sustainability Appraisal**

11. There is a requirement in Section 19(5) of the 2004 Act for local authorities to carry out Sustainability Appraisal (SA) as part of the preparation of a local plan. This is a systematic process to identify, describe and evaluate the likely significant effects of the plan and reasonable alternatives in order to promote sustainable development. The NPPF says that SAs should be proportionate.
12. The SA process is iterative. The SA Report (LBR1.11) explains how reasonable alternatives were developed to arrive at 12 alternatives in terms of both the quantum and distribution of development and also the reasons for selecting the preferred option. The further Interim Report (LBR1.11.2) assessed 4 specific options involving different rates of urban densification and Green Belt

release. Appendix 1 also contains a site options appraisal of sites in the Green Belt. Having regard to the NPPF and The London Plan it was reasonable for the concentration of growth in the Investment and Growth Areas to be treated as a 'given'.

13. It is to be expected that there will be disputes about some findings such as the scoring of topics like traffic and biodiversity. However, these come down to differences in planning judgement or opinion rather than undermining the SA undertaken. All options have been assessed against the same sustainability objectives on a like-for-like basis so as to provide a meaningful guide to the Council about the strategy that it should pursue. Overall the SA is suitably comprehensive, satisfactory and legally compliant.

## **Assessment of Duty to Co-operate**

14. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by Section 33A in respect of the plan's preparation. The Duty to Co-operate Statement (LBR1.14) set out how relevant bodies prescribed in Regulation 4 of the 2012 Regulations have been involved in the evolution of the RLP and how this involvement has helped to shape the emerging proposals.
15. The Council is, and has been, an active participant in regional, sub-regional and London-wide partnerships and groups. Strategic cross boundary matters have been identified. Furthermore, the steps taken to co-operate with, amongst others, the Greater London Authority (GLA), neighbouring Boroughs and Epping Forest District Council have been detailed. Statements of Common Ground have also been completed between the Council and the Environment Agency (LBR4.01), Newham (LBR4.02), Waltham Forest (LBR4.03), Havering (CED002), the GLA (CED019) and Historic England (CED042).
16. No adverse comments or objections have been made by any organisation in this respect. Overall I am satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the plan and that the duty to co-operate has therefore been met.

## **Assessment of Soundness**

### **Background and Evidence Base**

17. The RLP will replace the suite of existing development plan documents comprising the Core Strategy and Borough Wide Primary Policies, Area Action Plans (AAP) for Ilford, the Crossrail Corridor and Gants Hill as well as Development Sites with Housing Capacity and Development Opportunity Sites. In order to comply with Regulation 8(5) this should be confirmed and a schedule of superseded policies set out in an Appendix (**MM78**). There is also a duty under Section 24(1) of the 2004 Act for the RLP to be in general conformity with The London Plan.
18. Section 13 of the 2004 Act also requires the local planning authority to keep under review the matters which may be expected to affect the development of its area or the planning of its development. However, it is not one of the purposes of the independent examination, as set out in section 20(5), to determine whether this has been done.

19. Paragraph 158 of the NPPF refers to adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. The Planning Practice Guidance (PPG) on *Local Plans* at paragraph 014 also provides that appropriate evidence is essential but there is no prescriptive list. Rather the evidence should be focussed tightly on supporting and justifying the policies in the Local Plan having regard to paragraphs 159-177 of the NPPF.
20. There is a comprehensive and extensive evidence base which has been updated in the light of more recent information and the comments received at Regulation 19 stage. A combination of sources cover the matters of population, density, housing completions, air quality and the impact of Crossrail. It is sometimes going to be possible to claim that relevant matters should have been investigated more thoroughly. Evidence should nevertheless be proportionate. Whilst no separate parking survey has been undertaken the Council has produced a Parking Strategy (CED105) following consultation and is therefore likely to be aware of prevailing conditions for on-street parking. This is not a pre-requisite in the NPPF in any event. Overall there are no omissions in the evidence base such as to undermine the RLP.

### **Main Issues**

21. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings I have identified 13 main issues upon which the soundness of the plan depends. These are different from those used during the hearings since they have been modified in the light of the verbal contributions made and so that the report is structured in a logical fashion. Under these headings the report deals with the main matters of soundness rather than responding to every point raised by representors. In particular, the past performance of the Council in determining planning applications and how it might interpret the wording of policies in the future are distinct from matters of soundness.

### **Issue 1 - Are the vision and objectives for Redbridge sound having regard to the presumption in favour of sustainable development? Has the Local Plan been positively prepared?**

22. The population of Redbridge is growing at a fast pace. The RLP seeks to set out how this can be managed in a sustainable manner. The vision is therefore concerned with managing growth and investment, economic vitality and prosperity for all, connectivity and celebrating open spaces and enhancing historic assets. The strategic objectives have been developed to ensure that the vision can be achieved and are related to the 4 main sections of the RLP and the individual policies. Collectively they reflect the economic, social and environmental dimensions of sustainable development set out in the NPPF.
23. Overall I am satisfied that in broad terms the RLP has the presumption in favour of sustainable development at its heart and the vision and strategic objectives are accordingly sound. To the extent that it seeks to meet the need for development and infrastructure as opposed to prevent or severely restrict growth, the RLP has been positively prepared.

**Issue 2 - Is the overall spatial development strategy justified having regard to the needs and demands of the Borough, the relationship with national policy and Government objectives and the provisions of The London Plan?**

24. Policy LP1 establishes that new development will be directed to the Investment and Growth Areas (IGA), the main town centres and other identified Opportunity Sites. This is fully in line with the NPPF which provides that plan-making should focus significant development in locations which are or can be made sustainable (paragraph 17). Moreover, it accords with the potential identified in Policy 3.3 of The London Plan to realise brownfield housing capacity by various means including town centre renewal and in opportunity and intensification areas and growth corridors. However, Policy LP1 omits an overarching principle that development on Opportunity Sites will be considered favourably and this should be included for effectiveness (**MM2**).
25. The distribution of development would be concentrated in the south of the Borough. For example, 32% of the total planned housing delivery is proposed in the Ilford IGA and this figure reaches 60% if the Crossrail Corridor and Gants Hill IGAs are included. A high proportion of any windfall development may also take place in this wider area. However, this is hardly surprising given the national and London-wide policies referred to above. Ilford is the largest town centre in Redbridge and designated as an Opportunity Area and Metropolitan Town Centre in The London Plan with Housing Zone status. Together with the District and Local Centres of Seven Kings, Goodmayes and Chadwell Heath which are within the Crossrail Corridor IGA, it is due to benefit from the completion of the Elizabeth Line in 2019 which will be a catalyst for change. Gants Hill is a District Centre at a major transport node where re-development around the roundabout has already taken place.
26. Furthermore, some 30% of the Borough is Green Belt to which the Government attaches great importance and this, together with other environmental designations, limits the scope for development to take place on greenfield sites. Therefore, having been considered through the SA process, the broad spatial development strategy is an entirely understandable response to the nature of the Borough and to the policy position.

**Issue 3 - Are the Investment and Growth Areas justified and properly defined and will they positively promote the spatial vision and objectives for Redbridge? Are the policies for the individual Investment and Growth Areas justified, consistent with national policy and will they be effective?**

27. The 5 IGAs all have their own distinctive characteristics. Those located in Ilford, the Crossrail Corridor and Gants Hill have been rolled forward, at least in part, from areas covered by the existing AAPs. They and the IGAs at Barkingside and South Woodford are all in highly accessible locations, well-connected to the transport network. Furthermore, these areas also offer a range of identified deliverable and developable sites and therefore have substantial capacity between them to accommodate new homes, jobs and infrastructure. In different ways they will act as a focus for development and allow for growth to occur in a coherent fashion although the importance of designated heritage assets within and adjacent to them should be stressed in the text in order to fully reflect national policy (**MM3**).



28. The IGA boundaries are indicative rather than precise. However, the policies of the RLP relating to IGAs do not rely upon exactitude to be effective. It is something of a misnomer to describe the northern, outlying part of the Crossrail Corridor as a 'corridor' but this term is primarily a matter of convenience and not critical for soundness. Overall the IGAs have been properly defined. The relevant policies (LP1A – LP1E) set out the expectations for growth as well as the key infrastructure that will be required. As such they will positively promote the spatial vision and objectives for Redbridge. However, the detailed policy boxes need to be adjusted for accuracy to reflect later findings in the report about numbers of homes and jobs and the amount of retail and employment floorspace (**MM5, MM6, MM10, MM11 & MM15**).
29. The expectation is that there will be a mix of new residential and employment development for each of the IGAs thereby achieving a balance between living and working. To provide clarity this should be explained more fully in relation to South Woodford (**MM12 & MM14**). Given the availability of parking and the provisions of Policy LP23 there is no reason to preclude development at the IGAs on these grounds. Similarly growth in these areas should not be prevented due to concerns about excessive traffic given public transport connections and the intentions of the transport policies to encourage modal shift. The Central Line is fully stretched but it is proposed to increase capacity by 25% and the TfL Business Plan refers to improvements (CED113). Given that the scale of growth at South Woodford amounts to about 450 homes there is no reason to find this designation unsound. Whether infrastructure would be adequate and whether individual sites are justified will be considered later in the report. However, with certain changes the policies for the IGAs are justified, consistent with national policy and likely to be effective.

**Issue 4 - Is the housing requirement justified, will there be a sufficient supply of housing over the plan period, will there be a 5 year supply of housing sites and is the overall target for affordable housing and the type of tenure justified?**

*Housing requirement*

30. The NPPF provides that to boost significantly the supply of housing, local planning authorities should ensure that their local plans meet the full, objectively assessed needs for market and affordable housing in the housing market area as far as is consistent with its policies. However, The London Plan 2015 does not expect Boroughs to identify their own objectively assessed needs. Rather Policy 3.3 provides that Boroughs should seek to achieve and exceed the relevant minimum annual average housing target in Table 3.1. Where possible this should be augmented with extra housing capacity to close the gap between identified housing need and supply.
31. For Redbridge the annual monitoring target to 2025 is 1,123. By rolling this figure forward Policy LP2 indicates that the Council will deliver a minimum of 16,845 new dwellings over the plan period. This is consistent with The London Plan and can be taken to be the housing requirement for Redbridge.
32. If completions across the capital for 2013-2015 have fallen below those assumed in the London Strategic Housing and Land Availability Assessment

(SHLAA) then this backlog will presumably be 'captured' in the next London-wide assessment of housing need. In this regard a revised draft of The London Plan was published for consultation in December 2017. The final version of that document is some way off and, in particular, the housing target for Redbridge has not been settled. There is still too much uncertainty about this and over the implications of Brexit to warrant any adjustment to the current London Plan target. Policy LP2 is accordingly justified.

### *Housing supply*

33. Appendix 1 of the RLP gives details of the Development Opportunity Sites, Table 3 shows housing delivery by location and plan phase and Figure 12 sets out the housing trajectory. However, Appendix 1 provides insufficient detail on form, scale, access and quantum of development in line with paragraph 157 of the NPPF and paragraph 010 of the PPG on *Local Plans*. In addition, the Council undertook a review of the indicative development capacity of the sites (LBR2.06) following Regulation 19 representations from the GLA. Following the hearings a further review of capacity and phasing was undertaken to take account of that discussion and matters set out in my update of 27 June 2017 (IED007). This took on board the latest planning application information, recent discussions with landowners and developers and the constraints affecting some sites. That exercise led to a revised Appendix 1 (LBR2.06.1) which provides information about, and a description of, the major sites capable of accommodating 10 units or more as well as a list of allocated smaller sites (CED016).
34. The identified sites have been drawn from a variety of sources over time including existing allocations, the London SHLAA and the consultation undertaken for the RLP. The Council has deliberately spread the net wide for brownfield sites before narrowing down those that are suitable. All sites have been visited and there has been contact with the promoter or developer of those in Phase 1. Having regard to public transport accessibility levels (PTAL) and the identified character areas across the Borough, the density matrix at Table 3.2 of The London Plan has been applied to both town centre and other locations. Net site areas have been reduced to reflect the developable area having regard, for example, to flood risk zones and sites where education uses are also proposed. Capacity has also been modified as necessary to reflect heritage and townscape impacts and to allow for the provision of mixed use developments. The likely phasing has been updated to reflect the latest planning circumstances and sites where there are barriers to development.
35. As far as is possible this work provides a realistic basis for quantifying housing supply within the existing built-up area. As a result Appendix 1 and associated Table 3 and Figure 12 are inaccurate and should be replaced (**MM19, MM20, MM21 & MM74**). From now on, the report will use the updated information.

### *Housing deliverability*

36. The RLP housing requirement of 1,123 would be a major increase on the previous London Plan target of 760 dwellings per annum. Furthermore, housing completions were as low as 258 in 2014/15. Whilst no doubt affected by the recession the Council considers that past delivery was also due to a general lack of proactivity on its part as well as insufficient resourcing in the

face of competition from other areas. It is seeking to remedy these matters by establishing a development company; by making greater use of the Housing Revenue Account self-financing agenda; by greater partnership working; by promoting Ilford in a Prospectus (CED052) and by improving its development management service.

37. More tangibly the Council secured Housing Zone status for Ilford in 2015. Two schemes in Ilford Hill totalling 266 units were nearing completion at the time of the hearings and construction of a scheme for 354 units commenced in July 2017 at the Britannia Music site. This significant development activity 'on the ground' suggests that confidence in new housing coming to fruition in Redbridge and at Ilford in particular is not misplaced. This is also borne out by the increase in completions to 685 in 2015/16 and 818 in 2016/17.
38. Further grounds for optimism surround the completion of the Elizabeth Line in 2019 which will provide improved connections from Ilford and other stations within the Borough to central London and beyond. There were a number of discussions at the hearings about what the actual effect of the Crossrail project would be but, of course, the exact impact is difficult to predict. Some take a rosy view whilst others are more pessimistic in view of existing levels of overcrowding and as those living in Essex would be able to board trains from Shenfield before they come into Redbridge.
39. It would be futile to try and express the consequences of the Elizabeth Line as an exact percentage. What can be said is that the capacity of the trains would be significantly increased and that the rolling stock would be new. Moreover it would highlight to people the potential of this part of London and so act as a focus for investment as well as giving rise to public realm improvements. In turn, it is likely to stimulate the rate at which housing comes forward especially in the Ilford and Crossrail Corridor IGAs. There is also no evidence that the sites and scale of development identified in the RLP will be subject to obligations and policy burdens such that their viability is threatened. Consequently, whilst the requirement is ambitious, the housing proposed on previously-developed land in the RLP is deliverable in the plan period.
40. Some 500 dwellings are proposed within the 2km buffer zone around the Epping Forest Special Area of Conservation (SAC) including those within the South Woodford IGA. The Habitats Regulations Assessment (LBR1.12) and subsequent update (CED033) confirms that the RLP would not have a likely significant effect on this European conservation site either alone or in combination with other plans or projects. This is with particular reference to air quality and recreational pressure. Natural England concurs with this assessment and has no objection. Having regard to the judgment in *Wealden District Council v SSCLG and others* [2017] EWHC 351 (Admin) and the qualitative approach taken, the Assessment is adequate and reliable. The detail about assessment and mitigation of future proposals is covered in Policy LP39 but at this stage it can be established that the SAC does not form an overriding obstacle to housing delivery.

#### *Green Belt allocations*

41. The capacity for new housing from 'brownfield' sources over the plan period is 15,937. This is significantly below The London Plan target which is enshrined

in Policy LP2 as the housing requirement. As a result the Council has undertaken a review of potential Green Belt sites and the RLP proposes to allocate land for development at Oakfield (600 homes), King George and Goodmayes Hospitals (500 homes), Ford Sports Ground (850 homes) and Billet Road (1100 homes). However, having regard to the nature of its surroundings the density proposed at Billet Road is excessive. As a result it is recommended that the indicative capacity is reduced to 800 homes and this figure will be substituted in the report from now on. Each of these sites is covered by a separate policy 'box' in the RLP and concept masterplans have been produced for them (LBR2.78).

42. Paragraph 83 of the NPPF provides that, once established, Green Belt boundaries should only be altered in exceptional circumstances through the preparation of the Local Plan. The report will consider this question on a site by site basis in due course but there are some general considerations relating to housing delivery that affect the proposed releases.
43. The first is that without Green Belt sites the relevant housing requirement would not be met contrary to the aims of the NPPF and that there would not be general conformity with The London Plan. As explained above the yield envisaged from within the built-up area is realistic and there is no suggestion that obvious candidates for development have been omitted. Furthermore, the estimates of capacity have sought to maximise densities as far as possible.
44. Other ways of increasing brownfield housing capacity are referred to in Policy 3.3E of The London Plan. However, by means of its Employment Land Review (LBR2.33) the Council has assessed the scope for the managed release of employment land and some are included as Opportunity Sites often as part of mixed use developments. Small sites have been specifically allocated. An increase in densities in suburban areas is not supported by The London Plan and the matrix at Table 3.2. Furthermore, the option of higher density in the Western Corridor was considered as part of the SA process and discounted. There is insufficient evidence that including residential accommodation within new school sites would constitute a meaningful source of additional supply.
45. In theory more work could be done in an attempt to identify additional capacity within the built-up area. However, the exercise undertaken to date has been thorough and there is little evidence to indicate that other sources might bear fruit. Moreover, further intensification could have a significant impact on transport junctions and links and the character and townscape of the Borough. In short, the Council has done all it reasonably can to meet its housing requirement from existing 'brownfield' sites and to optimise potential but the result is that a shortfall of just over 900 dwellings would occur.
46. There are two further factors that support the release of Green Belt sites. The first is that the recent record of housing delivery in Redbridge has been poor. In the five years from 2010-2015 the average number of completions was 359 per annum. Compared to the relevant housing requirements for those years there has been a shortfall of 2,149 units. Furthermore, the objectively assessed need for Redbridge is 34,296 over the plan period according to the updated Outer North East London Strategic Housing Market Assessment (SHMA) (CED003). The housing required by Policy LP1 equates to only 51% of the objectively assessed need so that the "gap" between supply and need is a

substantial one. Without greenfield allocations this position would be even worse. These considerations mean that it is important for the Council to 'up its game' in terms of housing delivery as far as possible.

47. Paragraph 3.15 of The London Plan confirms that the capital should be treated as a single housing market for planning purposes. Therefore adjoining Boroughs are not expected to meet unmet requirements from neighbouring authorities. However, before releasing Green Belt land it is reasonable to enquire whether part of the housing requirement in Redbridge could be accommodated elsewhere within the outer north east London sub area. In this respect the Boroughs of Barking and Dagenham, Newham and Havering expect to be able to achieve their respective London Plan targets on brownfield land. It is inconclusive as to whether there is spare capacity but no evidence exists regarding deliverability or viability of sites. Any surplus in those Boroughs would help to reduce the overall housing shortage across London. So this matter does not weaken the case for the greenfield allocations.

#### *Five year housing land supply*

48. The NPPF expects that there should be a supply of specific deliverable sites sufficient to provide five years worth of housing against local requirements with an additional buffer. Owing to the persistent under delivery of housing in the past the Council has justifiably included a buffer of 20% in order to provide a realistic prospect of achieving the planned supply and to ensure choice and competition.
49. Of the sites included in Phase 1 (2015-2020) some 3,200 units are either completed, under construction or have planning permission. To achieve a five year housing land supply between 2017 and 2022 with a 20% buffer the requirement is for 6,738 units. If the shortfall from completions in the first two years of the plan period is included this figure rises to 7,481. Excluding windfalls the Council estimates that almost 8,800 units will be completed from 2017 to 2022 which allows for some degree of tolerance should any individual site not be progressed. This includes 29 sites where there is developer interest or sites that have been promoted at Regulation 19 stage and 12 Council owned sites which it is intending to bring forward soon.
50. The level of completions envisaged is unprecedented compared to those in recent years although a reasonable proportion of homes are already 'in the pipeline'. However, as outlined earlier, the various initiatives being pursued by the Council and the impetus given by the completion of the Elizabeth Line give cause for optimism about the pace of future housing delivery. No major impediments have been highlighted and there is no evidence that development of any site would be unviable. Overall the policies in the RLP should ensure the delivery of a five year housing land supply with flexibility to respond to changing circumstances.

#### *Later stages of plan period*

51. The housing trajectory indicates that the main 'spike' in housing delivery will be at the end of phase 1 of the plan period and the start of phase 2. As part of this and in assessing housing supply from phase 2 onwards the Council includes an allowance of 270 dwellings from windfall sites. This is a reasonable figure given that there has been an average of 332 such units

completed each year between 2015-2017, the general signs that delivery is increasing and the policy support for growth in the RLP.

52. The NPPF expects local planning authorities to describe how they will maintain delivery of a five year supply of housing land. The position in this respect is less certain in phase 3 of the plan period. However, the NPPF also refers to identifying a supply of deliverable sites, where possible, in years 11-15. Housing supply is expected to be strongest in the early years of the plan so any sites that 'slip' could contribute in later years without affecting the ability to meet the annual requirement in the earlier ones. Furthermore, the existence of a five year supply is a critical matter that would be monitored by the Council in any event. Indeed, across the 15 year plan period as a whole the evidence is that the overall requirement for dwellings would be met.

### *Affordable housing*

53. Policy LP3 seeks to maximise the provision of affordable housing by setting a strategic target of 30%. This would deliver, on average, a minimum of 336 additional affordable homes per year. However, the level of objectively assessed affordable housing need over the plan period equates to 833 homes per year according to the SHMA Update. Given this gap it follows that the target should be set at the highest possible level in order to address the need for this type of housing in line with paragraph 159 of the NPPF.
54. In this respect the Viability Assessment (LBR2.11) did not test the impact of setting the target at 35%. This percentage tallies with the threshold advocated in the Mayor of London's *Affordable Housing and Viability Supplementary Planning Guidance (SPG)*. The appraisals in the revised Viability Assessment (CED111) indicate that the 35% target should be deliverable on some sites that are expected to come forward during the life of the RLP. The studies were based on 21 sites which comprise a representative sample in terms of size and location. In view of these results the target in Policy LP3 is not justified as it has been set too low.
55. The proposed revised target of 35% is not an upper limit. It should assist in bringing about an increase in affordable housing delivery. Over the 3 years from 2013-2016 average completions have been 126 units per annum or 19% of the total number of new dwellings completed. However, the viability evidence does not support raising the target further bearing in mind the provisions of paragraph 173 of the NPPF. In conclusion a change to the policy is required for soundness and an affordable housing target of 35% would achieve this.
56. Policy 3.13 of The London Plan refers to the provision of affordable housing on sites with a capacity to provide 10 or more homes. Policy LP3 is expressed in similar terms to ensure consistency across London and it is viable to seek affordable housing contributions from sites yielding this number of units. There is no evidence that applying a threshold of 10 as opposed to 11 has been a burden for smaller developments. It is therefore justifiable to depart from national policy in the Written Ministerial Statement (WMS) of 28 November 2014. However, it is not clear how capacity will be assessed and to be effective reference should be made to the matrix at Table 3.2 of The London Plan (**MM23** & **MM24**).

57. The Council has considered increasing the total housing figures in order to help deliver the required number of affordable homes in line with the PPG. However, the housing requirement is derived from The London Plan and the RLP seeks to maximise both overall and affordable provision in any event. Furthermore, increasing housing supply to meet all affordable housing need would be unrealistic given the constraints on the Borough and previous delivery rates.
58. There are various policies in the RLP that seek to address the needs for all types of housing and the needs of different groups in the community. In particular, Policy LP4 aims to support older, vulnerable and homeless residents. If there is more that could be done to assist other groups in practical ways this is a matter for the Council's Housing Strategy.

#### *Conclusion on Issue 4*

59. Whether exceptional circumstances exist to warrant developing sites in the Green Belt will be considered in due course. Subject to this and the main modifications identified, the housing requirement is justified and there is a sufficient supply of housing over the plan period. The RLP also provides for a 5 year supply of housing sites and the amended target for affordable housing and the type of tenure is justified.

#### **Issue 5 – Does the RLP plan positively for the infrastructure required across the Borough and in Investment and Growth Areas by identifying what is required and how it can be funded and is it deliverable in timely fashion?**

60. In accordance with paragraph 162 of the NPPF the Council has worked with other authorities and providers to assess the quality and capacity of infrastructure and its ability to meet forecast demands. This has culminated in the completion of the Infrastructure Delivery Plan (IDP) (LBR2.21) which identifies the infrastructure needed to deliver planned growth sustainably, effectively and at the right time. This is to be treated as a 'live' document as it will be updated as new information becomes available. Appendix 2 of the RLP gives a detailed schedule of projects. In broad terms the IDP forms a comprehensive and sound basis for the future planning of the Borough.
61. Education provision is in hand for 1,470 additional primary school places and 420 secondary school places. Coupled with the on-going work with free-school providers there will be sufficient school places for Phase 1 of the RLP. In the longer-term there is expected to be a need for a further 10 primary school forms of entry and 47 secondary school forms of entry. This is due to the high child yield in the Borough and the pace of population growth. The intention is to meet this need largely through the provision of new schools on the 4 greenfield allocations in the east of the Borough, other Opportunity Sites within the urban area as well as the expansion of existing sites.
62. The Redbridge Primary Care Capacity Plan (LBR2.22) addresses the primary health care space requirements over the plan period. This will require some new health care facilities to be provided given the limited scope for greater utilisation of the existing estate. The identified requirements therefore comprise a mix of the reconfiguration of existing health centres and new

provision within each of the four localities of Cranbrook and Loxford, Seven Kings, Fairlop and Wanstead and Woodford.

63. Detail has been given about other types of infrastructure provision including hub and spoke children's centres and sources of funding. Policies LP17 and LP41 together give effect to the intentions of the IDP and are dealt with later. Subject to modifications the policies of the RLP as a whole will ensure that there is a reasonable prospect that planned infrastructure will be deliverable in a timely fashion in accordance with paragraph 177 of the NPPF. Furthermore, it makes clear, for at least the first five years, what infrastructure is required, who is going to fund and provide it and how it relates to the anticipated rate and phasing of development in line with paragraph 018 of the *Local Plans* PPG.
64. Therefore the RLP plans positively for the infrastructure required across the Borough and in IGAs.

### **Issue 6 - Are there exceptional circumstances that warrant altering the Green Belt boundary?**

#### *Green Belt Review and Addendum*

65. A series of Green Belt assessments have been conducted in connection with the RLP. These were comprehensively collated in the 2016 Review (LBR2.41) which considers all the Green Belt in the Borough against the 5 purposes identified in the NPPF. A Review Addendum (LBR2.41.1) provides further clarity and responds to Regulation 19 representations including those regarding 'omission' sites. Inevitably there are discrepancies and differences between this evidence and the earlier work that goes back to 2010. However, the two latest reviews are the 'final word' and provide the evidence that the Council relies upon. Therefore very detailed comparisons with what has gone before serve no real utility.
66. The methodology of the Review and Addendum properly focusses on the purposes in paragraph 80 of the NPPF. They have not made any assessment of the preservation of historic towns as there are none in Redbridge. The assistance the Green Belt gives to urban regeneration is assumed to be nil because all brownfield sites with reasonable prospects of development have been identified. That view is flawed as a matter of principle because the aims of the Green Belt are long-term but as this purpose applies to most land it does not form a particularly useful means of evaluating sites. Nevertheless the interpretation of "town" to refer to all settlements and "countryside" to refer to undeveloped land that is contiguous with or connected to other countryside is reasonable in the local context. Generally the Review and Addendum are robust and logical in their approach although clearly there is scope for disagreement about the individual judgements made.
67. In the light of the evidence the RLP proposes to both include and exclude small parcels of land (GB03b, GB04a, GB12e and GB12f) in order to create coherent boundaries and to take account of changes in land use or apparent mapping errors. These practical considerations comprise exceptional circumstances such as to warrant these modest changes. A further category of sites are those which are now developed and consequently meet none of the Green Belt purposes (GB11c, GB12b, GB12c and GB12d). There are



therefore exceptional circumstances to justify removing this land around Roding Hospital and Claybury Hospital from the Green Belt.

68. The larger parcel of land at Roding Hospital and surrounding area (GB11b) also contains built development. The Review and Addendum conclude that none of the Green Belt purposes are met here. It makes a very limited contribution to the purpose of encouraging urban regeneration and is largely surrounded by existing development. Because of its location the land does not fulfil the purposes in relation to sprawl, merging or encroachment and its open parts are separated from the Green Belt designation along the Roding Valley such that their retention as Green Belt would give rise to an illogical boundary. These considerations are sufficient to amount to the exceptional circumstances required to alter the Green Belt boundary.

### *Strategic sites*

69. As far as the 4 strategic allocation sites are concerned the Green Belt Review and Addendum deals with King George and Goodmayes Hospitals and Ford Sports Ground together (GB16b). This parcel also includes Seven Kings Park. The hospitals site is already quite heavily built on. The land as a whole is surrounded by housing and the A12 forms a very clear demarcation to the north. Whilst, as indicated above, part of the site serves some long-term function in assisting urban regeneration it contributes little to the overall purposes in NPPF paragraph 80.
70. Billet Road (GB14c) includes Little Heath School which is not allocated for housing. It is bounded by residential development to the east at Marks Gate and there is scattered development immediately to the west and along part of Billet Road. Hainault House within the site is also developed. Its function in preventing sprawl or the merging of settlements is limited. However, there are fields to the north and given the extent of undeveloped frontage to Billet Road there is a visual connection with the land opposite. The A12 runs to the south and is an enclosing feature but from this direction it is apparent that the open parts of the site are contiguous with the countryside. Therefore the land does assist in preventing encroachment.
71. Oakfield (GB13b) is divided from the rest of Fairlop Plain by the railway embankment and is largely enclosed by housing. Whilst the position on the ground may not have changed since the original designation this does not preclude a review being undertaken now against Green Belt purposes. Because it is more or less surrounded by development and the railway line and due to its function the land cannot be categorised as countryside. Neither does it check sprawl or prevent the merging of Barkingside with Hainault. Oakfield therefore performs poorly against the five Green Belt purposes.
72. All 4 of these sites have some Green Belt value in terms of the fifth bullet point of paragraph 80 of the NPPF. Billet Road also assists in safeguarding the countryside from encroachment. But just because a site contributes in some way to Green Belt purposes does not mean it cannot be released. Indeed, there are other factors to put into the equation.
73. The need for Green Belt releases if the housing requirement in Policy LP2 is to be met has been referred to previously. In short, there is insufficient deliverable or developable 'brownfield' land to meet the requirement. This is

also in the context of a recent under delivery of housing and an objectively assessed need that is much higher than the target in The London Plan. In combination these factors are of very significant weight in favour of developing Green Belt sites.

74. Furthermore, the sites are important in meeting the infrastructure needs of the Borough. Schools are proposed on all 4 of them and community hubs on all bar Ford Sports Ground. The concept masterplans show that this is feasible although provision is unlikely to be required until the later stages of the plan period. Adjustments may be required if more places become available through free school providers and the locality hub at Oakfield is an alternative to the modernisation of the Fullwell Cross Health Centre. Notwithstanding these caveats the ability to provide accessible local services that reflect the community's needs and support its health, social and cultural wellbeing is one of the dimensions of sustainable development. Accordingly this is also a matter of significant weight.
75. In general terms all of the sites are reasonably suited to housing. That is particularly the case for Oakfield given the close proximity to Fairlop underground station and the services and facilities at Barkingside District Centre. The other 3 sites all adjoin existing housing but are further from Goodmayes Local Centre and the stations along the Elizabeth Line. However, the A12 is a public transport corridor allowing links to Newbury Park underground station. So these 3 sites do not have the highest credentials in terms of an accessible location but neither are they places where new housing would be unacceptable.
76. As far as site specific matters are concerned the concept masterplans show how issues of flooding, protected trees and the Site of Importance for Nature Conservation (SINC) could be taken into account at King George and Goodmayes Hospitals and Ford Sports Ground. Suitable access can be devised and detailed matters would be dealt with at planning application stage. To ensure that phased development at the hospitals site is co-ordinated a further planning brief is required. Furthermore, for clarity some adjustment to the detailed criteria is necessary including reference to family housing and the potential to re-use existing non-designated heritage assets if this is feasible and practical (**MM7 & MM9**).
77. At Billet Road traffic in the surrounding area is increasing and there is evidence of long tailbacks on Hainault Road/Billet Road, congestion and difficulties at the roundabout and additional traffic along Painters Road and Aldborough Road North. These problems are acknowledged but the impact of any specific proposals could be mitigated following detailed studies. Given this, there is insufficient evidence that the residual cumulative impacts of development would be severe. No adverse transport impacts have been identified at any of the other sites and the consequences for air quality have been assessed and would be within relevant limits.

*Replacement sports pitch provision for Oakfield and Ford Sports Ground*

78. Oakfield and Ford Sports Ground are in use as sports pitches. The intention is for these to be replaced at Hainault Recreation Ground, Forest Road and Goodmayes Park Extension. To accord with paragraph 74 of the NPPF this

should be done by equivalent or better provision in terms of quantity and quality in suitable locations.

79. Feasibility reports for the re-provision of these facilities (LBR2.44.1 & LBR2.44.6) indicate that the soil is such that this can be achieved to the requisite quality. It is also possible to tackle any issues with stones satisfactorily. On-going maintenance is a key consideration but the Council outlined various options for this. The layouts show how the number of pitches for football and cricket would be provided and that there is scope for pavilions and parking. Funding for the entirety of the works and any transitional arrangements could be secured through the planning application process. Whilst both proposed locations are some way from the existing pitches they are not so remote as to be unsuitable.
80. As land owner of Oakfield and of the proposed replacement sites the Council is well placed to ensure a smooth transfer and that both capital and on-going costs can be met. The policy provisions could give certainty that new housing development and replacement sports provision would go hand-in-hand. Furthermore, the development of Oakfield and Ford Sports Ground is expected at the end of the plan period so there will be time for the specific actions to be undertaken.
81. As accepted by Sport England at the hearings the re-location of the pitches is technically feasible. Issues of future management of the sites and of security are not so insuperable as to preclude the allocations. Nevertheless the upheaval that would be caused would be considerable and the disruption may last for some while during a 'settling in' period. Furthermore, there is an especially strong affinity with the land at Oakfield given the investment made in terms of both time and finance. However, the new pitches would develop their own identity and it is not unknown for clubs and players at all levels of sport to move their 'home' from one place to another. The listing of Oakfield as an Asset of Community Value is due to expire in 2021. This and the lifting of covenants do not materially affect whether the allocation is justified. Hainault is within an area safeguarded for mineral extraction but the risks to future displacement of any new facility are very low.
82. However, paragraph 73 of the NPPF stresses that access to opportunities for sport and recreation can make an important contribution to the health and well-being of communities. The Playing Pitch Strategy (PPS)(LBR2.43) is somewhat contradictory in that it identifies a need to retain all current existing playing field provision yet, at the same time, refers to feasibility studies being undertaken in relation to the re-provision elsewhere of the Oakfield and Ford facilities. A further complication is that the PPS envisages replacing the existing pitches at Ford at sites other than Goodmayes Park Extension.
83. The PPS uses sub-areas to provide a good 'fit' between facilities and demand. However, across the Borough there is projected to be a deficiency of junior and mini football pitches to 2030 and whilst there would be a surplus of cricket pitches there would be a deficiency in two of the sub-areas. The question is whether, in providing replacement facilities, overall provision across the Borough and the respective sub-areas would remain adequate. This is particularly as Hainault Recreation Ground is currently in use and also because Goodmayes Park Extension is earmarked for new provision in any event.

84. In response the Council has sought to provide clarification of the overall position regarding playing pitch provision for football and cricket in the relevant sub-area and across the Borough as a whole in four different scenarios (CED050). Whilst the PPS has not been updated this note refers to the pitches identified within the 4 strategic sites that were not previously taken into account as well as the development of 3G rubber crumb pitches which will have the effect of increasing capacity.
85. Sport England raises a number of detailed concerns about factors such as the growth of south Asian league cricket; securing community use for some sites; intentions and locations of certain clubs; the practicality of retaining small pitch areas at the strategic sites and whether 3G pitches would impact on the use of grass ones. Indeed, there is no clear statement of how pitch provision would meet estimated demand across the Borough in 2030 if Oakfield and Ford are developed. The same applies if only one of them were built on and not the other. One of the elements of the social dimension of sustainable development therefore would be jeopardised by the RLP allocations.

#### *Conclusions on the strategic sites*

86. There are exceptional circumstances to warrant altering the Green Belt boundary to allow housing development at Billet Road and King George and Goodmayes Hospital sites. This is because of the limited contributions they make to Green Belt purposes, locational and site specific matters, the provision of new education and health facilities and the need for releases to meet the requirement for housing. These sites would promote sustainable patterns of development as referred to in paragraph 84 of the NPPF. However, when the overall loss of playing pitch provision is added into the balance that is not the case for Oakfield and Ford Sports Ground. Once spaces of this nature are gone they are gone for good. In response to my advice (IED012) the Council proposes to remove these allocations from the RLP.

#### *Green Belt boundaries*

87. The Council is satisfied that the Green Belt boundaries will not need to be altered at the end of the development plan period. Furthermore, the new boundaries have been defined clearly using readily recognisable physical features that are likely to be permanent such as roads, fences, building footprints and railway embankments. Having regard to the other sites put forward through the examination process, particularly those in Roding Lane South, Tomswood Hill and Woodford Bridge and paragraph 85 of the NPPF, the detailed boundaries are justified.

### **Issue 7 – What is the effect of deleting the strategic allocations at Oakfield and Ford Sports Ground?**

88. Removing these sites from the RLP would reduce the number of housing units by 1,450. This would have a significant impact on supply but the total expected housing delivery to 2030 from all sources would be 17,237 which would exceed the minimum requirement in Policy LP2. The Council has attempted to close the gap between identified housing need and supply in accordance with The London Plan as far as possible. However, the Green Belt

and the provision of playing pitches are important considerations that prevent the target being further exceeded.

89. It was anticipated that these sites would be delivered in the later stages of the plan so that the 5 year supply would not be affected. Some secondary school provision could be made at the other strategic sites and is required at the end of the plan period in any event. The Redbridge Clinical Commissioning Group is undertaking a feasibility study into primary health care at Fullwell Cross as an alternative to Oakfield and is confident that sufficient capacity will be delivered. Consequently the 'knock on' effects of de-allocating these sites would not jeopardise the overall soundness of the RLP and do not warrant the allocation of replacement or further sites in the Green Belt. Furthermore, there is no case for requiring this as a means of 'future proofing' given that the new London Plan is in its early stages and as the RLP is so far advanced.
90. A request has been made for an extension of time to test the principle of relocating the pitch provision at Ford Sports Ground to an area encompassing its southern part, Seven Kings Park and the land between. However, it is not obvious how this would overcome the issue of ensuring that overall pitch demand is met over the plan period. Furthermore, the Council was given an opportunity after the close of the hearings to provide further evidence about playing pitch provision and to respond to the further observations of Sport England (IED007 & IED011). In any case, it would not be in the interests of effective plan-making in the Borough to delay the progress of the RLP.
91. Oakfield and Ford Sports Ground have an existing function as playing pitches. Because of this they can be distinguished from the two other strategic housing sites that are to be released from the Green Belt. Having considered the wider implications of not developing those sites it is concluded that exceptional circumstances do not exist to alter the Green Belt boundaries as shown in the RLP. Accordingly to achieve soundness these allocations should be removed and consequential changes made to reflect this including the adjusted housing numbers (**MM1, MM8, MM16 & MM17**). Given its relationship with the Ford Sports Ground the proposed removal of Seven Kings Park and the Barley Lane allotments from the Green Belt should also not proceed. Furthermore, to provide a consistent boundary with Oakfield there is no compelling reason to remove the school playing fields at Fairlop Plan (GB14b) from the Green Belt.

**Issue 8 - Are the other development Opportunity Sites in Appendix 1 justified, deliverable within the plan period having regard to any constraints and consistent with national policy?**

92. Planning permission has been given for 214 new homes at The Exchange Shopping Centre in Ilford (Site 2) and it is justifiable to reflect this extant permission in the allocation. Given that the proposed uses are wide ranging it is reasonable for the allocation to cover the entire site area. The reference to leisure uses is consistent with the NPPF definition of main town centre uses.
93. The area for housing and education at the Newton Industrial Estate (site 139) in the revised Appendix 1 has been reduced to reflect the retention of part of the site as a Local Business Area. This is supported by the Employment Land Review. There is insufficient evidence to show that the present need for secondary schools is so acute that employment uses should not be protected.

94. Station Estate at South Woodford (site 117) is allocated for 120 dwellings and commercial uses. It is within the IGA close to the underground station and was selected by the Tall Buildings Study (LBR2.77) for scenario testing. This concludes that a notional scheme for 149 dwellings would have no significant townscape or heritage impact. However, that illustrative proposal included no non-residential floorspace and as this is an important part of the allocation an adjustment to the indicative capacity is not warranted. Whilst there may be scope for a tall building the reference to a "contemporary landmark" in paragraph 3.6.5 of the RLP is not justified and should be omitted (**MM13**).
95. Following the changes to Appendix 1 the detail about the Opportunity Sites within and outside IGAs is adequate. Those in the revised schedule are justified, deliverable and consistent with national policy. Furthermore, the indicative housing capacity figures are just that and not a cap. However, for clarity Policy LP2 and the text needs to confirm this and that the quantum of new homes specified is subject to other RLP policies (**MM4, MM18 & MM22**).

**Issue 9 - Are the policies relating to town centres and employment and promoting and managing growth justified, consistent with national policy and will they be effective?**

*Town centres and employment*

96. To ensure the future vitality and viability of town centres Policy LP9 seeks to retain a strong hierarchy. However, to be effective the policy should be more explicit that town centre uses are to be directed there, that the scale of development should be proportionate and that proposals outside town centres should have assessed all other options first. The policy also sets minimum targets for comparison and convenience floorspace of over 32,000 sq m in total based on the findings of the Retail Capacity Assessment (LBR2.34). Whilst no specific designations are proposed, the Opportunity Sites have scope to provide over 68,000 sq m of floorspace, often as part of mixed use developments, thereby meeting the identified retail needs with something to spare. Subject to confirming the figures for net and gross floorspace this policy is justified. Inaccuracies in the listing of some centres and the status of Newbury Park also need to be addressed (**MM31 & MM77**).
97. The NPPF refers to defining primary and secondary frontages in designated centres and also to setting policies that make clear which uses will be permitted in such locations. Policy LP10 is concerned with managing town centres and retail uses and seeks to strike a balance between protecting core retail functions whilst allowing for flexibility and diversity where this would be suitable. The 70% threshold for retail uses in primary shopping frontages represents a continuation of previous adopted policy. Having regard to the existing percentages of Class A1 uses across the centres in the Borough there is no overwhelming evidence that this should be adjusted.
98. However, the policy seeks to maintain 50% of retail uses in secondary frontages. This threshold is currently only exceeded in one centre in the Borough and would be unduly prohibitive. Based on the evidence provided a figure of 40% is more realistic and justified and should be inserted. The policy also needs to explain how the expectations regarding the amount of retail uses will be applied in decision-making in order to be effective. Some centres are

under the relevant thresholds so exception provisions are also required to avoid units becoming unoccupied for lengthy periods (**MM32**).

99. In order to manage clustering Policy LP11 seeks to resist the proliferation and over concentration of hot food takeaways, betting/gambling shops, money lenders and shisha bars for reasons of health and amenity. There is no evidence to justify the preclusion of further uses of a similar type within 50m of an existing unit or the 400m limitation on shisha bars and these criteria should be removed.
100. For hot food takeaways the policy seeks to permit no more than 5% of units within the primary and secondary frontages as Class A5. There is some public unease about the number of such uses and the PPG on *Health and Wellbeing* indicates that policies can be brought forward which limit the proliferation of certain use classes in identified areas. However, there is no clear evidence that saturation point has been reached in any centre or that adverse planning consequences would inevitably result if that proportion or a higher one were breached. Overall criterion (a) in relation to hot food takeaways is unsound and should be omitted.
101. Levels of obesity amongst children in Redbridge are higher than the national average and are increasing for year 6 children. Although by no means the only factor contributing to poor diet and obesity the evidence provided by the Council, particularly the responses to the Great Weight Debate, indicates that in Redbridge the presence of hot food takeaways in close proximity to schools encourages and enables children to eat takeaway food. Wider studies also support this. The proposed criterion to resist proposals for Class A5 uses within 400m of schools or youth centres would not prevent the consumption of high fat and high sugar food by young people. Nonetheless planning can assist in creating healthier consumption choices and the PPG encourages local planning authorities to have particular regard to the proximity to locations where young people congregate. The restriction is therefore a justified policy response to address this issue based on the specific local circumstances. Whilst this might inhibit individual businesses there is no evidence that the modified policy would be detrimental to the local economy as a whole.
102. It is unreasonable to expect betting/gambling shops, money lenders and shisha bars to demonstrate how they will promote the health and well-being of Borough residents on an individual basis. Furthermore, referring to environmental health provisions for shisha bars in the policy is not sound as it duplicates other legislation (**MM33**).
103. To stimulate business and the local economy, Policy LP14 envisages the managed release of over 14 ha of outdated, underutilised or poorly performing employment land. Criterion (d) nevertheless places undue constraints on Opportunity Sites where re-development is proposed and should be adjusted for effectiveness. At the same time and in light of the Employment Land Review the designated industrial and business areas are to be protected.
104. Furthermore, the policy supports the provision of a minimum of over 21,000 sq m of new, purpose built modern office and business accommodation. This is a mixture of both extra and replacement floorspace and will be provided at Opportunity Sites and by intensification of existing industrial and business

areas. As over 40,000 sq m can be provided at the former alone there is clear scope to meet this target and so ensure that the supply of land available for economic development is sufficient and suitable in accordance with the NPPF. However, specific provision should be made for live/work units and detailed adjustments are required for effectiveness (**MM35**). A change is also required to Policy LP15 to clarify how managed workspace is to be achieved (**MM36**).

*Promoting and managing growth*

105. The Outer North East London SHMA refers to a concentration of students in Redbridge and Policy 3.8 of The London Plan refers to planning for their needs. Consequently the omission of any such reference from Policy LP4 on specialist accommodation is unsound and should be rectified (**MM25 & MM26**).

106. The preferred housing mix in Table 4 of the RLP is for 50% of new market and social/affordable rented housing to be large homes of 3 bedrooms or more and 40% of intermediate housing. However, this is below the need for 75% of total objectively assessed need to comprise homes of this size. Policy LP5 focuses on the provision of family sized homes but meeting the need in full is nonetheless unrealistic given the expectation that much new development will be flatted and not necessarily suitable as family housing. That said, the policy approach represents a 'step change' away from the existing priority for smaller units and is broadly justified as it will go some way towards providing greater housing choice as sought by the NPPF.

107. Nevertheless based on the work done in connection with the concept masterplans it would be reasonable to expect that any greenfield allocations achieve the preferred mix in full. Given the significant identified need for larger homes in the Borough the policy should be more prescriptive in this respect rather than rely on site-by-site assessments alone. The factors that will be taken into account in conducting these exercises should also be set out to provide certainty (**MM27**).

108. Policy LP6 on dwelling conversions is not worded positively and should allow for some sub-division. Nevertheless the provision of a larger ground floor flat should be required having regard to the considerable need for family housing outlined above. Clarification is also needed about cumulative impacts and internal space. With these recommended modifications the policy is justified and effective (**MM28**). The increase in unauthorised accommodation within domestic outbuildings ('beds in sheds') in Redbridge has been problematic due to the poor standard and quality of the accommodation, health and safety issues and effect on amenity. A strong policy restriction on such development is therefore justified based on experience. However, changes are needed to the wording of Policy LP7 in the interests of effectiveness. Clarification is also required about when back garden development will be supported as otherwise the policy would be silent on that matter (**MM29**).

109. The Gypsy and Traveller Accommodation Assessment Update (LBR2.02) concludes that the existing site at Northview Caravan Site, Forest Road has the capacity to accommodate the identified need for 7 pitches over the plan period. Policy LP8 therefore provides a basis for decisions in case applications come forward in line with paragraph 11 of the Planning Policy for Traveller Sites. However, changes are required to the criteria to ensure that they are



fair and would facilitate the traditional and nomadic way of life of travellers whilst respecting the interests of the settled community (**MM30**).

110. Evidence was given to the effect that there is a preponderance of hotels and bed and breakfasts in Ilford. However, based on planning application data the growth in hotel bedrooms over the last 5 years has been small. Consequently the criterion preventing an over-concentration of such uses has not been supported by the Council and is not justified. Otherwise Policy LP13 allows for new tourist accommodation in line with the aspirations of Policy 4.5 of The London Plan to increase hotel bedrooms by 2036. However, to dovetail with other policies and to be sound, the loss of residential accommodation should be avoided. A clause to this effect is therefore necessary (**MM34**).
111. Policy LP17 is about delivering community infrastructure. This term should be clearly defined in the supporting text and the IGAs referenced. Moreover, the policy lacks an overarching requirement for new development to be accompanied by infrastructure provision to meet the needs arising from that development. This should be remedied to ensure effectiveness. Therefore, whatever the existing stresses and strains in the system, new development will not be permitted unless suitable supporting provision either is, or will be, in place. The NPPF indicates that policies should guard against the unnecessary loss of valued facilities and services and criterion (g) gives effect to that intention. However, the requirement to re-provide facilities elsewhere if there is no need for them is unreasonable and so this section of the policy should be modified in order to be justified (**MM37, MM38 & MM39**).
112. Policy 3.2 of The London Plan encourages consideration of the use of health impact assessments. Policy LP18 is unclear as to when these will be sought and the PPG on *Health and well-being* refers to them being a useful tool when the impacts are expected to be significant. They should therefore only be required on strategic sites of over 150 units. With this change the policy is justified (**MM40**).

### **Issue 10 - Are the policies relating to promoting a green environment justified, consistent with national policy and will they be effective?**

113. Climate change mitigation and low carbon and renewable energy are covered by policies in the RLP. Together with the requirements for sustainable design and construction in section 5, climate change issues are adequately addressed in line with Section 19(1A) of the 2004 Act. However, clarity is required about the operation of the energy hierarchy in Policy LP19 and the positive stance the Council takes on on-site renewable energy opportunities in Policy LP20 (**MM41, MM42 & MM43**).
114. The RLP has been prepared in accordance with Diagrams 2 and 3 of the PPG on *Flood Risk and Coastal Change*. The majority of Opportunity Sites are within Flood Zone 1. For those sites identified in Zones 2 or 3 by the Strategic Flood Risk Assessment (LBR2.61.2) the sequential and exception tests have been applied and passed. The wording of Policy LP21 and the accompanying text nevertheless needs reinforcing to underline the importance of minimising flood risk and for clarity about various detailed matters (**MM44 & MM45**).

115. Policy LP22 seeks to promote sustainable transport in line with one of the core planning principles of the NPPF of making the fullest possible use of public transport, walking and cycling. Modal shift away from the car is to be encouraged by various 'soft' means and evidence was given about some of the steps taken although many of these are beyond the ambit of the RLP. In addition, the overall strategy is to direct new development to highly accessible locations. A pattern of development that supports the use of sustainable modes of transport is supported by paragraph 30 of the NPPF. Major developments will also be expected to provide Green Travel Plans.
116. Nevertheless the Transport Assessment (LBR2.50) forecasts that 7 junctions and 3 links will experience a net increase in traffic of more than 20% over the life of the RLP. The Supplementary Technical Note (CED117) provides a high level review of the types of mitigation measures that may be considered and provides a useful basis for future considerations. Referring to this work will provide clarity about the application of criterion (i) which otherwise stipulates that new development with an unacceptable adverse impact on traffic congestion will be resisted. All major developments will be expected to provide Transport Impact Assessments to detail the particular implications of individual schemes.
117. It is to be expected that traffic will grow over the years until 2030 and part of this will be attributable to the new developments identified in the RLP. There are bound to be localised impacts across the Borough but there is no evidence that the residual cumulative impacts will be severe. There is also no clear indication that the consequences of additional traffic will be such that deliverability will inevitably be prevented. For effectiveness the reference to a servicing and delivery plan in Policy LP22 should be corrected but proposed MM47 imposes a more stringent test than the policy itself and is therefore not recommended. Subject to the necessary change identified the overall approach to promoting sustainable transport is justified (**MM46**).
118. Appendix 7 of the RLP sets out minimum and maximum parking standards. Whilst allowed for in the Minor Alterations to The London Plan (MALP) on *Parking Standards* the Council has provided no evidence to support higher levels of provision within the parts of the Borough with the lowest public transport accessibility. Consequently the use of minimum standards for residential uses in PTALs 0-1 is not justified and should be replaced by reliance on The London Plan parking standards. The size required for disabled parking bays should be corrected (**MM48**).
119. The MALP confirms that some operational parking is required on site for functional reasons and adequate disabled parking spaces must also be provided. These provisions should provide suitable safeguards when future applications are considered under Policy LP23. Concern was raised about levels of car ownership as opposed to car use - especially for families - and examples were also given of parking difficulties and obstruction. However, there is no overriding reason to set aside the use of the adopted London-wide policies in Redbridge.
120. Policy LP24 seeks to protect the health of residents from pollution. The entire Borough is within an Air Quality Management Area (AQMA) and the Action Plan (AQAP) of 2007 is in the process of being revised in line with the UK Air

Quality Plan published in July 2017. The current position is that parts of the Borough near busy roads including the A12 are not in compliance with the statutory limits for nitrogen dioxide.

121. The policy does not adequately contribute towards the aims of paragraph 124 of the NPPF in relation to compliance. Neither does it identify offsetting measures in support of an air quality action plan in line with the PPG on *Air Quality*. As a consequence modifications are recommended to include a link with the measures in the forthcoming AQAP, to specify the locations which are of poor air quality and to stipulate that permission will be refused where air quality exposure is not reduced to an acceptable level. These will combine with other criteria which require that major development should be air quality neutral in line with Policy 7.14 of The London Plan and that air quality assessments be provided for certain schemes (**MM49 & MM50**).
122. On the wider issue of air quality in the AQMA a range of steps are being pursued. Some of these are led by the Mayor of London including the proposed extension of the Ultra Low Emission Zone to the North Circular Road. At a local level the Ilford Garden Junction initiative is a Low Emission Neighbourhood funded scheme. Furthermore, other policies in the RLP collectively seek to support modal shift away from the car by promoting development close to public transport facilities and also encourage 'greening' as part and parcel of new development. Given that much development will be on previously-developed land the impact on emissions is also likely to be no greater than that caused by previous uses. The air quality assessments undertaken for the greenfield Opportunity Sites (LBR2.62 & LBR2.63) conclude that there are unlikely to be significant adverse effects on local air quality over the plan period arising from them.
123. As modified, Policy LP24 would complement the future AQAP and assist in its implementation. Having regard to cumulative impacts, the RLP would not delay or jeopardise compliance with the statutory limits. As such it is justified and consistent with national policy in relation to air quality considerations.
124. The NPPF refers to the vital role of the development of high speed broadband in enhancing the provision of local services and facilities. In order to keep pace with technological changes Policy LP25 should therefore include a provision aimed at advancing digital infrastructure (**MM51**).

**Issue 11 - Are the policies relating to achieving quality design justified, consistent with national policy and will they be effective?**

125. In promoting high quality design Policy LP26 is nevertheless unreasonable in its expectation for improvements and overly prescriptive regarding the need for a high degree of compatibility. Modifications are therefore required for effectiveness and to be consistent with national policy so as to allow for innovation, originality and initiative. The NPPF seeks to achieve a good standard of amenity but the requirements of criterion (m) are excessive as they would preclude development that has any impact on amenity.
126. Paragraphs 57, 58, 61 and 69 of the NPPF make specific reference to inclusive design and accessible environments. However, this matter is missing from Policy LP26 and should be added to achieve soundness. Together with other

policies regarding accessibility and health and well-being, sufficient positive provision would be made within the RLP so that this important aspect of design is recognised and can be secured (**MM52**).

127. Policy LP27 identifies Tall Building Zones which are derived from the existing AAPs for Ilford, Gants Hill and the Crossrail Corridor. These zones are a 'starting point' for the identification of areas that are appropriate, sensitive or inappropriate for tall buildings in line with Policy 7.7 of The London Plan. Although the Tall Buildings Study recommends the consideration of an alternative spatial hierarchy it does not establish that the Zones are fundamentally flawed. Rather it corroborates their locations. Hence the Study does not show conclusively that the policy approach should be jettisoned and the concept of the Tall Building Zones is therefore justified and sound. In other respects modifications are necessary to ensure that the policy is properly aligned with the London Plan so that it is effective (**MM53 & MM54**).
128. Powers under the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 to control advertisements may only be exercised in the interests of amenity and public safety. Policy LP28 refers to other matters and seeks to prevent signage in conservation areas outside town centres without justification. Modifications are therefore required to achieve soundness (**MM55**).
129. National policy refers to a good standard of amenity for future occupants of buildings. Given the value of private amenity space and the pressure on land it is reasonable for the RLP to require provision of outdoor areas. However there is no basis for the minimum sizes sought so that Policy LP29 is not justified in this respect. Changes are therefore recommended to bring these into line with the Mayor of London's *Housing* SPG for flats and with an adjoining Borough following a benchmarking exercise (**MM56**). Given the range of housing required in Redbridge, existing London Plan provisions and the lack of evidence about an adverse impact on viability, the implementation of the nationally described internal space standards is justified.
130. The lengthy explanation of the operation of the prior approval system for large household extensions in Policy LP30 is unnecessary and should be deleted (**MM57**). Basement development is a growing trend across the Borough and Policy LP31 sets out criteria for considering such proposals including the submission of an impact assessment and a construction management plan. In broad terms these are justified in order to allow for such proposals to be controlled having regard to the potential impact on the environment and the living conditions of those nearby. However, to be effective and to avoid duplication the detailed wording should be adjusted (**MM58**).
131. Redbridge is within an area of severe water stress. In view of the clear local need and the provisions of paragraph 5.61 of The London Plan it is necessary for Policy LP32 to include the optional Building Regulation requirement for water use of 110 litres/person/day. The WMS of March 2015 makes clear that no additional local technical standards should be set for new dwellings. Consequently the reference to the BREEAM domestic refurbishment scheme should be deleted from criterion 4(a). Greater clarity is required about the application of the BREEAM ratings for non-domestic buildings but seeking the Excellent standard is consistent with the aspirations of The London Plan. The

need for sustainable statements has been superseded and this should be removed (**MM59**). Due to the similar provisions in The London Plan, the evidence base and having regard to paragraphs 005 – 012 of the PPG on *Housing: optional technical standards*, the requirements for wheelchair accessibility in the RLP are justified.

132. Policy LP33 does not expressly make it clear that harm to heritage assets will be weighed against any public benefits in line with the NPPF and nor does it adequately cover archaeological interests. These omissions should be rectified to ensure consistency with national policy (**MM60**).

**Issue 12 - Are the policies relating to managing and enhancing the Borough's assets justified, consistent with national policy and will they be effective?**

133. Policy LP34 on managing and protecting the Green Belt and Metropolitan Open Land refers to the provisions within the NPPF and is therefore consistent with national policy.

134. Quite large swathes of the southern half of the Borough are within areas of open space deficiency as shown in Figure 24. However, this is not uncommon in London. Most residents are at least within the catchment area of a metropolitan scale open space and there are other important areas of open space beyond the Borough boundaries. However, given the location of most of the Opportunity Sites the provisions of Policy LP35 regarding protecting and enhancing open spaces should be strengthened for effectiveness. This is to confirm the types of new space that should be considered in dense urban areas and that any off-site provision should be nearby rather than remote. The reference to resisting "inappropriate development" on protected spaces is unclear and should be clarified. Both these policies, the associated text and Figure 22 also require consequential changes to reflect the modifications in relation to Oakfield, Ford Sports Ground, Seven Kings Park and Fairlop Plain (**MM61, MM62 & MM63**).

135. Specific reference should be made to local food growing in Policy LP36 on allotments having regard to the PPG on *Health and Wellbeing*. This refers to ensuring the provision of adequate space for such opportunities. The protection of agricultural land should accord with national policy (**MM64**). Local plans should contain a clear strategy for enhancing the natural environment and consequently various additional references are required in this section of the RLP regarding biodiversity and wildlife (**MM65 & MM66**). There is no evidence to justify the clause regarding the over-concentration of burial facilities which should therefore be omitted from Policy LP40 (**MM70**).

136. Policy LP39 on nature conservation and biodiversity reflects the provisions of the Conservation of Habitats and Species Regulations 2017 in relation to the Epping Forest SAC. The initial results of the visitors' survey review on behalf of the Conservators do not undermine the appropriateness of the 2km buffer zone in considering the effects of recreational pressures. However, the policy lacks an explicit explanation of the types of mitigation solutions required. These are likely to be the provision of, or contribution towards, Suitable Alternative Natural Greenspace and/or a contribution to Strategic Management and Monitoring Measures. To provide certainty such references should be

included together with the Council's intention to provide further guidance on the application of the policy and payment levels in a Supplementary Planning Document. Furthermore, reference should be made to the possibility of air quality impacts from developments generating significant additional traffic beyond 2km. All of these changes are necessary to protect the integrity of this European site (**MM67, MM68 & MM69**).

137. Whilst the SINCs in the Borough have not been reviewed for some time (CED021) there is no requirement for this to be done in order for the RLP to be found sound. On the contrary it has identified and mapped this component of the local ecological network in accordance with NPPF paragraph 117 and Policy LP39 establishes that they should be protected.

#### *Conclusion on issues 9-12*

138. Subject to the recommended main modifications referred to above the development management policies of the RLP are justified, consistent with national policy and effective.

#### **Issue 13 - Does the Local Plan have clear and effective mechanisms for implementation, delivery and monitoring?**

139. Policy LP41 sets out a range of means by which the Council will deliver the vision, objectives and policies of the RLP. In working with relevant providers it is necessary that infrastructure is secured at the appropriate time in accordance with the masterplans and this stipulation should be inserted for effectiveness. A comprehensive set of relevant indicators with targets is included in Appendix 3 for monitoring purposes. This should be updated to reflect the passage of time and the IDP (**MM71, MM72, MM73 & MM75**). Subject to these changes, the mechanisms for implementation, delivery and monitoring are clear and effective.

#### **General conformity with The London Plan**

140. The GLA objects to the de-designation of two sites from the Green Belt. However, The London Plan does not wholly preclude such steps being taken and there are exceptional circumstances to justify this. Furthermore, many of the policies of the RLP fully reflect the spatial development strategy. Indeed, when looked at as a whole, I am satisfied that, as modified, there would be general conformity with The London Plan.

141. There is no need for the Council to give a specific commitment to an early review of the RLP. No doubt it will consider this after the final publication of the new London Plan and the amended Regulations of 2017 will require this to be completed every 5 years in any event.

#### **Public Sector Equality Duty**

142. In undertaking the examination I have had due regard to the equality impacts of the RLP in accordance with the Public Sector Equality Duty, contained in Section 149 of the Equality Act 2010. This, amongst other matters, sets out the need to advance equality of opportunity and foster good relations between people who share a protected characteristic and people who do not share it.

143. There are specific policies concerning specialist accommodation for the elderly, gypsies and travellers and accessible environments that should directly benefit those with protected characteristics. In this way the disadvantages that they suffer would be minimised and their needs met in so far as they are different to those without a relevant protected characteristic. There is also no compelling evidence that the RLP as a whole would bear disproportionately or negatively on them or others in this category.

## Assessment of Legal Compliance

144. My examination of the compliance of the RLP with the legal requirements is summarised in the table below. I conclude that the plan meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The RLP has been prepared in accordance with the Council's LDS of February 2017.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in May 2006. Consultation on the RLP and the MMs has been in compliance with it.
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Habitats Regulations Assessment (HRA)	The HRA screening report and its update conclude that there will be no likely significant effect on European conservation sites. Natural England supports this and has no objection.
National Policy	The RLP is consistent with national policy except where indicated and MMs are recommended.
2004 Act (as amended) and 2012 Regulations.	The RLP complies with the Act and the Regulations.

## Overall Conclusion and Recommendation

145. The plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.

146. The Council has requested that I recommend MMs to make the plan sound and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix the Redbridge Local Plan 2015-2030 satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

*David Smith*

INSPECTOR

This report is accompanied by an Appendix containing the Main Modifications.