

# Sustainability Appraisal (SA) of the Redbridge Local Plan

SA Statement

February 2018

REVISION SCHEDULE					
Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	Feb 2018	SA Statement published alongside the adopted version of the Redbridge Local Plan	Mark Fessey Principal Consultant	Steve Smith Technical Director	Steve Smith Technical Director

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## 1 INTRODUCTION

### Background

- 1.1.1 The Redbridge Local Plan was submitted to Government, for Examination by an appointed Planning Inspector, on 3<sup>rd</sup> March 2017. Examination hearings were held between 6<sup>th</sup> June and 21<sup>st</sup> July 2017, subsequent to which the Council held a consultation on Main Modifications (to the submitted plan) in October and November 2017.
- 1.1.2 The Inspector published a report into the Plan's legal compliance and soundness on 24<sup>th</sup> January 2018. The Inspector concluded that the Plan is legally compliant and sound, subject to a series of modifications being made. The Local Plan, incorporating modifications, is recommended for adoption at a Full Council meeting on 15<sup>th</sup> March 2018.
- 1.1.3 A parallel process of Sustainability Appraisal (SA) was undertaken alongside plan-making, led by consultants AECOM (from 2016 onwards; with earlier SA having been led by the Council). SA is a mechanism for considering and communicating the likely effects of an emerging plan, and reasonable alternatives, with a view to achieving sustainable development.

### SA explained

- 1.1.4 It is a requirement that SA involves a series of procedural steps. The final step in the process involves preparing a 'statement' at the time of plan adoption.
- 1.1.5 The aim of the SA Statement is to present –
- 1) the 'story' of plan-making / SA up to the point of adoption; specifically, the Regulations<sup>1</sup> establish a requirement to: *“summaris[e] how environmental considerations have been integrated into the plan or programme and how the environmental report... the opinions expressed... and the results of consultations... have been taken into account... and the reasons for choosing the plan... as adopted, in the light of the other reasonable alternatives dealt with”*; and
  - 2) *“measures decided concerning the monitoring of plan implementation”*.

### This SA Statement

- 1.1.6 This is the Redbridge Local Plan SA Statement, and hence considers **(1)** and **(2)** in turn. This Statement concludes by presenting a checklist of legal requirements, with a view to demonstrating legal compliance.

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<sup>1</sup> The information to be provided in the Statement is listed in Article 9 of the SEA Directive / Regulation 16 of the Regulations.

## 2 THE PLAN-MAKING / SEA 'STORY'

### 2.1 Introduction

2.1.1 Essentially, SA must feed-into and inform plan-making in two ways:

- 1) Appraisal of alternatives informs preparation of the Draft Plan.
- 2) The SA Report, and consultation responses received during the Draft Plan / SA Report consultation, informs plan finalisation.

2.1.2 However, it is typical for a Local Plan-making / SA process to involve more than two steps and this was the case with the Redbridge Local Plan.

2.1.3 This section gives consideration to each of the main plan-making / SA steps in turn:

- Preferred Options Report (POR) consultation (2013)
- Preferred Options Report Extension (PORE) consultation (2014)
- Publication of the Pre-Submission Plan (2016)
- Further work post publication (2016/17)
- Consultation on Proposed Modifications (2017)
- Plan finalisation (2017)

2.1.4 In line with regulatory requirements, there is a focus on explaining how sustainability considerations have been taken into account and influenced plan-making, including as a result of alternatives appraisal and other SA work, and consultation on plan / SA documents.

N.B. steps are covered in an increasing amount of detail, for the simple reason that findings from early plan-making / SA steps are now dated, and somewhat superseded.

### 2.2 Preferred Options Report consultation (2013)

2.2.1 Understanding at the time was that the Borough must make provision for 760 dwellings per annum (dpa), or 11,400 homes over the period 2013-2028, in order to comply with the London Plan of 2011. The Council recognised that making provision for this number of homes would not meet full housing needs – understood to be at least 2,000 dpa - but providing for 11,400 new homes was understood to reflect a pragmatic assessment of land availability/suitability, drawing on the London-wide Strategic Housing Land Availability Assessment (SHLAA, 2009) and Redbridge Green Belt Review (2010).

2.2.2 The Preferred Options Report proposed to make provision for 11,400 homes across a series of **Opportunity Sites** (Map 1 of the consultation document), and sought to achieve a particular focus within five **Investment Areas** (Map 2 of the consultation document).

## 2.3 The Preferred Options Report Extension consultation (2014)

### The consultation document

2.3.1 The document explained that, whilst a preferred broad growth strategy had been identified and published for consultation in 2013 (i.e. within the Preferred Options Report, see above), by 2014 the Council had identified a need to give further consideration to alternative spatial approaches to distributing the required housing. Specifically, the report stated on page 1 that:

*“This report stems from a statement made by the Cabinet Member for Planning and Public Protection at full Council in September 2013. The statement was made in the context of opposition to proposals to develop land at Oakfield, Barkingside for housing and community infrastructure in a garden suburb setting. The statement committed the Council to consider alternative strategies to meet the Borough’s housing and infrastructure needs, should it be decided that Oakfield will not be designated as a development opportunity site... **This report therefore presents a number of possible strategies for discussion and debate** so that the final choice is fully informed by the views of residents and other stakeholders and allows the Borough to grow sustainably that is in a way that balances the long term social, economic and environmental needs of the Borough.” [emphasis added]*

2.3.2 The consultation document identified four spatial strategy alternatives:

- 1) Proceed with the proposals as per the POR, including Oakfield
- 2) Proceed with the proposals as per the POR, except with higher density redevelopment of King George/Goodmayes Hospitals and Fords Sports Ground (to enable no Oakfield)
- 3) Proceed with the proposals as per the POR, except with higher density redevelopment within the Woodford to Wanstead ‘Western Corridor’ (to enable no Oakfield)
- 4) Proceed with the proposals as per the POR, except with additional development at unspecified sites in the Green Belt (to enable no Oakfield).

### Sustainability Appraisal

2.3.3 An appraisal of the four alternatives was presented within Appendix B of the consultation document. The appraisal identified all options to be associated with pros and cons, i.e. the choice of option would involve a need to ‘trade-off’ between competing strategic objectives.

2.3.4 Specifically, the appraisal found Option 1 (the preferred option) to perform best in terms of: delivering community facilities; protecting the character of residential areas and conserving heritage assets; meeting housing need (on a par with Option 4, which would involve additional Green Belt allocation(s) in place of Oakfield); and ensuring good access / supporting sustainable travel choices (on a par with Option 3, which would involve additional development within the Borough’s western corridor, in place of Oakfield). However, the appraisal found Option 1 to perform least well in terms of preserving open spaces / natural areas and making best use of brownfield land (on a par with Option 2, which would involve doubling the density of redevelopment at the Goodmayes site, in place of Oakfield; and Option 4). The appraisal also highlighted that Option 1 performed best in terms of ‘deliverability’, given that the whole of the Oakfield site is owned by the Council, and whilst there are some leases to the sporting clubs that currently occupy the site, there are no major impediments to bringing it forward for redevelopment.

### Consultation responses

2.3.5 Many important issues were raised through the consultation, including the following:

- Historic England suggested that Option 1 would cause least harm to the historic environment, although noted the need to further consider archaeology. Other findings were: Option 2 requires further details about the impact on the Little Heath Conservation Area and how it will inform development, but support is given to retaining the locally listed Goodmayes Hospitals, and a heritage led approach to the development of the site; Option 3 could involve piecemeal intensification of the western corridor, which could result in adverse impacts upon the historic environment; recognising the extent of Conservation Areas; Option 4 could lead to issues in respect of the Green Belt purpose to 'preserve the setting and special character of historic towns'; and more generally there is a risk of impacts to heritage assets.
- The Environment Agency highlighted that Option 2 would require the sequential test to be passed, a Level 2 Flood Strategic Flood Risk Assessment to be undertaken, and the exceptions test to be passed, due to the risk of flooding from Seven Kings water. Also highlighted was the need to consider the flood storage role of Green Belt sites, particularly within the Roding Valley.
- Natural England had no substantive comments to make in relation to the alternatives, but highlighted Hainault Forest and Epping Forest as particularly sensitive assets; and highlighted the need to enforce accessible natural green-space standards.
- Sport England objected to Options 1 and 2 on the basis that there were no details of supply and demand in relation to playing pitches, nor details regarding what land would be used to replace lost playing pitches. Overall the suggestion was that either option would result in the unacceptable loss of playing field land and sports provision. Similar responses were also received from the London Playing Field Association and other organisations.
- The Highways Agency (now Highways England) had no substantive comments on the alternatives, but highlighted the need to reduce the need to travel, with infrastructure improvements on the Strategic Road Network only considered as a last resort.
- The Greater London Authority (GLA) had no substantive comments to make in relation to the alternatives, but highlighted that the level of public transport accessibility (both current and planned) should be a key factor in determining a site's allocation for future development.
- Transport for London acknowledged that Options 1, 2 and 3 would all ensure good accessibility to existing and proposed rail corridors. In respect of Option 4 concern was expressed that there is generally an existing lack of public transport provision.
- The London Wildlife Trust supported the brownfield focus of Option 3, with a second preference for Option 1 so long as the playing fields are not relocated to Sites of Nature Conservation Importance on Fairlop Plain. Concern was expressed about Option 2.

2.3.6 It is also important to note that a large number of representations were received in relation to **Oakfield Playing Fields** (Option 1), from organisations currently using the site and from local residents. Representations overwhelmingly objected to the Council's proposals on the grounds that Oakfield provides a valuable regional facility for sporting clubs (notably football and cricket) and that recreational open space for local residents that should not be lost. A number of petitions were prepared, and notably Lee Scott MP presented to Parliament on 10<sup>th</sup> February 2015 a petition of the Save Oakfield Site (SOS) Campaign signed by approximately 5,000 people. The petitioners referred to the importance of the extensive facilities at Oakfield to a wide range of users, and suggested that loss would be contrary to the spirit of the Olympic Legacy and the objective of reducing obesity.

**2.4 Publication of the Pre-Submission Plan (2016)**

Introduction

2.4.1 The aim here is to –

- explain the process of developing the spatial strategy alternatives in 2016;
- present a summary of spatial strategy-related appraisal findings from the SA Report; and
- summarise key representations received in relation to the spatial strategy.

Developing spatial strategy alternatives (2016)

2.4.2 Subsequent to the Preferred Options Extension Consultation (see above), the London Plan (2016) set a housing target for Redbridge of 1,123 dpa, or 16,845 homes over the plan period, having taken into account capacity as identified through the London-wide SHLAA of 2013.

2.4.3 Understanding of housing needs was then updated in 2016, on the basis of a new Strategic Housing Market Assessment (SHMA) for the North London Housing Market Area (covering the London Boroughs of Barking and Dagenham, Havering and Redbridge) finding Objectively Assessed Housing Need (OAHN) to equate to 2,132 dpa, or 31,977 dwellings over the plan period, i.e. a figure almost double the target set by the London Plan (2016).

2.4.4 Given the London Plan housing target, the up-to-date understanding of housing needs and the range of potential development sites in the Borough, it was recognised that there was a need to develop, appraise and consult-on alternative spatial strategies that varied in terms of both ‘quantum’ (level of growth) and ‘distribution’ (location of growth) - see **Table 2.1**. For further explanation of the reasonable alternatives (2016), please see Chapter 6 of the SA Report (2016) and/or Section 2.4 of the Interim SA Report (2017).

Table 2.1: Reasonable spatial strategy alternatives 2016 (summary)

Option	Quantum	Distribution <i>As per the Preferred Option (PO), but with...</i>
1	Minimum growth (16,750 homes)	No Oakfield or Billet Rd
2	Lower growth 1 (17,350 homes)	No Billet Rd
3	Lower growth 2 (17,850 homes)	No Oakfield
<b>4</b>	<b>PO (18,450 homes)</b>	-
5	Variation on PO 1 (18,450 homes)	No Oakfield; Higher density at G'mayes/King George/Ford
6	Variation on PO 2 (18,450 homes)	No Oakfield; Higher density in Western Corridor
7	Variation on PO 3 (18,450 homes)	No Oakfield; Higher density at G'mayes/King George/Ford and Billet Rd
8	Variation on PO 4 (18,450 homes)	No Oakfield; Extra Green Belt
9	Higher growth 1 (19,050 homes)	Higher density at G'mayes/King George/Ford
10	Higher growth 2 (19,050 homes)	Higher density in Western Corridor
11	Higher growth 3 (19,050 homes)	Extra Green Belt (Fairlop Plain; undefined site(s))
12	High growth (19,650 homes)	Extra Green Belt (Fairlop Plain; undefined site(s))



Spatial-strategy-related appraisal findings (2016)

- 2.4.5 The SA Report published for consultation alongside the Pre-submission Plan presented information on the spatial strategy alternatives within ‘Part 1’ (“What has plan-making / SA involved up to this point?”). Specifically, within Part 1 of the SA Report: Chapter 6 explained the process of developing the reasonable alternatives; Chapter 7 presented an appraisal of the reasonable alternatives; and Chapter 8 presented the Council’s response to the appraisal of reasonable alternatives (i.e. the Council’s reasons for supporting the preferred approach, in light of alternatives).
- 2.4.6 Part 2 of the SA Report (“What are appraisal findings at this current stage”) then presented an appraisal of the Pre-Submission Plan as a whole.
- 2.4.7 Key findings from the SA Report, in respect of the spatial strategy, are summarised below. Specifically: **Box 2.1** presents the alternatives appraisal conclusions; **Box 2.2** presents the Council’s response to the alternatives appraisal / their reasons for supporting the preferred approach; and **Box 2.3** presents conclusions from the Pre-submission Plan appraisal. Also, for ease of reference, **Figure 2.1** presents the Pre-Submission Plan Key Diagram.

Figure 2.1: The Pre-submission Plan Key Diagram



*Box 2.1: Reasonable spatial strategy alternatives appraisal (2016)*

“In conclusion, it is apparent that some options perform better than others, but that there is no obviously best performing / ‘most sustainable’ option. Key considerations are as follows:

- **Poverty** - The alternatives perform on a par. Whilst certain options are better suited to the delivery of community infrastructure (see discussion below), it is not clear that there will be implications for poverty and social exclusion (recognising that the alternatives do not vary in terms of approach to growth in the south of the Borough; where major benefits are set to be realised, most notably at Ilford). King George/Goodmayes Hospitals and the Ford Sports Ground are notable for being well linked to the Crossrail corridor, but it is not clear that this will translate into ‘poverty and social exclusion’ benefits.
- **Crime** - The alternatives perform on a par. Whilst certain options are better suited to the delivery of a high quality and legible urban realm (see discussion below, under ‘townscape’), it is not clear that there will be implications for crime.
- **Housing** - In general, there is a need to deliver higher growth in order to more fully ‘close the gap’ between land supply and objectively assessed housing needs; also, there is a need to deliver an appropriate housing mix, in terms of type (family housing is needed) and tenure (affordable housing is needed). Options involving higher growth at ‘King George/Goodmayes Hospitals and the Ford Sports Ground’ or in the Western Corridor (Options 5, 6, 8 and 9) perform relatively poorly, given implications for the desired housing mix.
- **Education, services and health** - Oakfield is a growth location that performs well given its location (good access to Barkingside, public transport, leisure facilities and open space) and given potential to deliver a new school and health facility; albeit there remain some uncertainties in respect of re-providing for lost sports pitches (with no net loss in the quality of provision locally). Options involving higher growth at ‘King George/Goodmayes Hospitals and the Ford Sports Ground’ or in the Western Corridor (Options 5, 6, 8 and 9) perform relatively poorly, given issues around delivering community infrastructure.
- **Landscape/townscape** - There are clear sensitivities locally, and so lower growth performs well. Billet Road is assumed to be sensitive from a landscape perspective, given that past Green Belt Reviews have found the area to contribute to Green Belt purposes; the Borough’s Western Corridor is highly sensitive from a heritage perspective; higher density growth at ‘King George/Goodmayes Hospitals and the Ford Sports Ground’ would compromise design / urban realm objectives; and additional Green Belt development would clearly impact significantly on Fairlop Plain’s characteristic openness.
- **Biodiversity** - Higher density development at ‘King George/Goodmayes Hospitals and the Ford Sports Ground’ could place pressure on Seven Kings Water, which is an important ecological corridor (given potential for deculverting and restoration). Also, whilst much of the Fairlop Plain area comprises arable farmland likely to be of limited biodiversity value, it is noted that a significant area is farmed under an agri-environment agreement, plus there is a need to consider the possibility of growth in proximity to Hainault Forest SSSI impacting on the site’s condition (which is ‘unfavourable recovering’).<sup>2</sup>
- **Transport and traffic** - Whilst it is difficult to draw strong conclusions in the absence of detailed assessment, it is apparent that certain locations - notably Billet Road and Fairlop Plain, and to a lesser extent ‘King George/Goodmayes Hospitals and the Ford Sports Ground’ - are less well linked to existing centres and public transport.
- **Climate change** - There are a number of opportunities to deliver district heating infrastructure, and thereby minimise per capita greenhouse gas emissions from the built environment. One area where there is an identified opportunity is ‘King George/Goodmayes Hospitals and the Ford Sports Ground’, and hence it is assumed that options involving higher density at this site (Options 5 and 8) perform relatively well (as higher density development supports district heating viability).”

<sup>2</sup> The appraisal should also have highlighted that all of Fairlop Plain is designated as a Site of Importance for Nature Conservation.

*Box 2.2: The Council's response to the alternatives appraisal (2016)*

The following text is the Council's response to the alternatives appraisal / reasons for supporting the preferred approach (Option 4) -

"The Council's preferred spatial approach to growth and change aims to respond to the key planning challenges since the adoption of the Core Strategy and Borough Wide Primary Policies (2008), representations received through consultations, and a suite of technical evidence base. There is a need to develop a positive strategy to enable the delivery of successful places and a thriving economy, taking into account other Council plans and strategies that influence the Borough; and ultimately provide a robust planning framework against which the aspirations of the Council can be successfully delivered.

The preferred spatial approach is to direct growth to the Borough's Investment and Growth Areas and town centres. These areas are highly accessible locations, well connected to the Borough's public transport network. They offer a range of investment opportunities with substantial capacity to accommodate new homes, jobs and infrastructure. It is considered that the preferred approach is the most sustainable and will achieve the London Plan housing target of 1,123 homes and help close the gap between it and the objectively assessed housing need. The Council's decision to proceed with Oakfield as an opportunity site and the other sites of Goodmayes and King George Hospitals and the Ford Sports Ground and land at Billet Road will significantly contribute towards the Council meeting its housing need.

The SA process has informed the Local Plan and in general supports the preferred strategy. Whilst the alternatives appraisal process has highlighted that there are draw-backs to the preferred approach, it has enabled the Council to reach a conclusion that it is, on-balance, the most sustainable option. In particular, the Council is of a view that:

- A lower growth option involving nil growth at Oakfield would compromise the achievement of important housing delivery objectives without leading to a plan that performs notably better in terms of other strategic objectives (recognising the merits of this site, and the potential to address issues at the site through policy and committed plan implementation).
- A higher growth approach would help to meet objectively assessed housing needs more fully, but would compromise achievement of other important objectives (e.g. higher density development would lead to challenges from a community infrastructure delivery perspective, impact on character and quality of life)."

*Box 2.3: Pre-Submission Plan appraisal (2016)*

"The appraisal of the draft (Pre-Submission) plan... does not highlight the likelihood of significant negative effects in terms of any objective, and suggests the likelihood of significant positive effects predicted in terms of 'the economy' - a matter at the heart of the plan, as reflected in the clear focus on five Investment and Growth Areas. A focus on supporting growth within certain areas and corridors could also lead to significant positive effects in terms of transport and community objectives; however, there is more uncertainty. With regards to 'housing', the plan performs well in that the aim is to meet and exceed the London Plan target, and also deliver a housing mix that responds to needs; however, the evidence provided by the Strategic Housing Market Assessment (SHMA) suggests that some housing needs will remain unmet.<sup>3</sup> Relatively few strategic tensions / trade-offs are highlighted through the draft plan appraisal, recognising that the preferred approach is something of a balancing act, arrived at subsequent to appraisal of more extreme options (e.g. higher growth options that would perform well in terms of socio economic objectives, but perform poorly in terms of environmental objectives; and vice versa lower growth options - see discussion of alternatives in Part 1 of this report). There will, of course, be localised negative effects of growth to contend with - e.g. in respect of landscape and heritage - but a stringent set of development management policies is set to be put in place to ensure that effects are mitigated as far as possible. A small number of recommendations are included within the above appraisal, which can be discussed during the plan's examination."

<sup>3</sup> To be clear, the Pre-Submission Plan housing strategy (18,774 homes) involved exceeding the London Plan target (16,845 homes), but not providing for full objectively assessed needs (31,977 homes). This approach reflected: A) National policy (NPPF para 47), which establishes that objectively assessed need must be met within the Housing Market Area (HMA); and B) the London Plan, which treats London as one HMA, and anticipates unmet need being absorbed across the HMA.

## Representations received on the spatial strategy (2016)

- 2.4.8 A large number of representations were received on the Pre-Submission Plan, with many issues raised in relation to the spatial strategy.
- 2.4.9 Most notably, the **GLA** submitted a letter raising concerns in respect of the Pre-submission Plan, with the following specific points made –
- *“... it is the Mayor’s opinion that whilst he supports many aspects of the plan it is not in conformity with the London Plan, as it has not demonstrated “exceptional circumstances” to support the proposed release of Green Belt.”*
  - *“In more general terms, the Mayor recognises that protecting the Green Belt is a challenge facing many boroughs, but considers that they must seek capacity to address housing need without intruding upon it.”*
  - There is a need for further work to explore means of releasing additional capacity, with the example given of proposed sites within the Crossrail Corridor, which *“appear large enough to be able to result in a neighbourhood with a distinctive character at a higher density in line with London Plan Policy 3.7.”*
  - Also in relation to additional capacity, the letter goes on to explain that: *“Other Opportunity Areas in London have shown that they can provide much higher numbers of new homes than indicated in Annex 1 of the London Plan and it is likely that Ilford and other ‘Investment and Growth’ areas [proposed by the plan] have capacity for more housing...”*
  - The letter objects to all six proposed Green Belt release sites, most notably objecting to the following three –
    - Billet Rd – on the basis that the site meets Green Belt and open space tests.
    - King George/Goodmayes Hospitals and Ford Sports Ground – in advance of a comprehensive masterplan any release of Green Belt would be premature.
    - Oakfield – mostly likely meets the criteria to be designated as Metropolitan Open Land, and the All London Green Grid Supplementary Planning Document shows the site to have potential to form part of a Metropolitan Park.
  - Other spatial strategy related matters raised by the letter include –
    - The Council should seek to provide for more affordable homes than the number envisaged by the Pre- Submission Plan (336 per year), which the letter describes as ‘very low’.
    - The Mayor welcomes the general approach of supporting a wide range of housing needs.
    - The Mayor welcomes the commitment to mitigating climate change, and especially welcomes the approach to improving air quality across the Borough.
  - The representation submitted on behalf of the Mayor did not make reference to the findings of alternatives appraisal, although did acknowledge that the Council had explored opportunities and ‘consulted widely on approaches’.



- 2.4.10 The GLA's position was supported by the **Oakfield Society**, whose position was one of opposition to release of Green Belt at Oakfield for a number of reasons, including: *"Amenity: the part of Oakfield that would be developed is 45 acres of high amenity value open space, 17 adult and youth football pitches, four cricket ovals and two large, modern pavilions. The grass roots sports ground is rated the best in LBR and probably East London. Over 1,000 people use these facilities for sport, recreation and community social activity every week of the year."* Oakfield Society questioned the detailed analysis underpinning the LBR Playing Pitch Strategy and Alternative Playing Pitch Sites Assessment, e.g. suggesting that insufficient consideration had been given to the quality of sports facilities needed for top amateur cricket and football. The Oakfield Society concluded that:
- "There are insufficient exceptional circumstances that outweigh the undoubted benefits of Oakfield such that LBR can claim that there is a necessity to develop it for housing. Housing on Oakfield would amount to less than 3% of the Borough's objectively assessed need in the Plan period. The amount of social and affordable housing would be inconsequential. On the other hand the immense amenity value for the community will be sustained if the well organised, volunteer led sports & social clubs on Oakfield are allowed to continue on site." There is also the suggestion that: "LBR has not meaningfully cooperated with other Boroughs to identify brownfield sites elsewhere to help meet its objectively assessed housing needs."*
- 2.4.11 Conversely, there was opposition to the view of the GLA, in particular from **NOISE** (Neighbourhoods of Ilford South Engage) and the **South Woodford Society** –
- NOISE submitted a lengthy representation giving numerous reasons why Ilford is not suited for the level of growth proposed by the Pre-Submission Plan, and certainly would not be suited to a higher level of growth (as proposed by the GLA). The group concluded that: *"We feel this Plan will only exacerbate the current problems in Ilford South."*
  - South Woodford Society concluded that proposed housing growth within the South Woodford Investment and Growth Area cannot be accommodated, given constraints including –
    - Transport - South Woodford is heavily reliant on the Central Line, which is not coping with the current footfall, and it is difficult to see how its potential could be improved. The footfall at South Woodford station is significantly higher than the stations along the Hainault branch where attention for further housing growth should focus.
    - Schools - There are no proposals for new schools in South Woodford so new homes will increase demand for school places in the local area. The school expansion schemes already in place are unprecedented, e.g. sports grounds have been lost.
    - Other infrastructure - The only site which will potentially provide some leisure facility is site 122 which would only be able to accommodate a small scale proposal.
    - Business - The plan allocates all business sites in South Woodford for residential.
- 2.4.12 There was also potentially some conflict with GLA's position evident in the detailed representations received from **Historic England**. A high level statement is made that: *"The Investment and Growth Areas extend outside the boundaries of the centres... In the case of some centres the indicative areas encompass conservation areas and listed buildings. The plan should be clear that the expectations should take account of the need to reconcile growth ambitions with heritage assets to ensure that development is sustainable in the manner required by the NPPF (para 8), and with the local plan objectives for celebrating and enhancing Redbridge's heritage."*

**2.5 Further work post publication (2016/17)**

**Introduction**

2.5.1 The aim here is to:

- explain the process of developing refined spatial strategy alternatives; and
- present a summary of spatial strategy-related appraisal findings from the 2017 Interim SA Report.

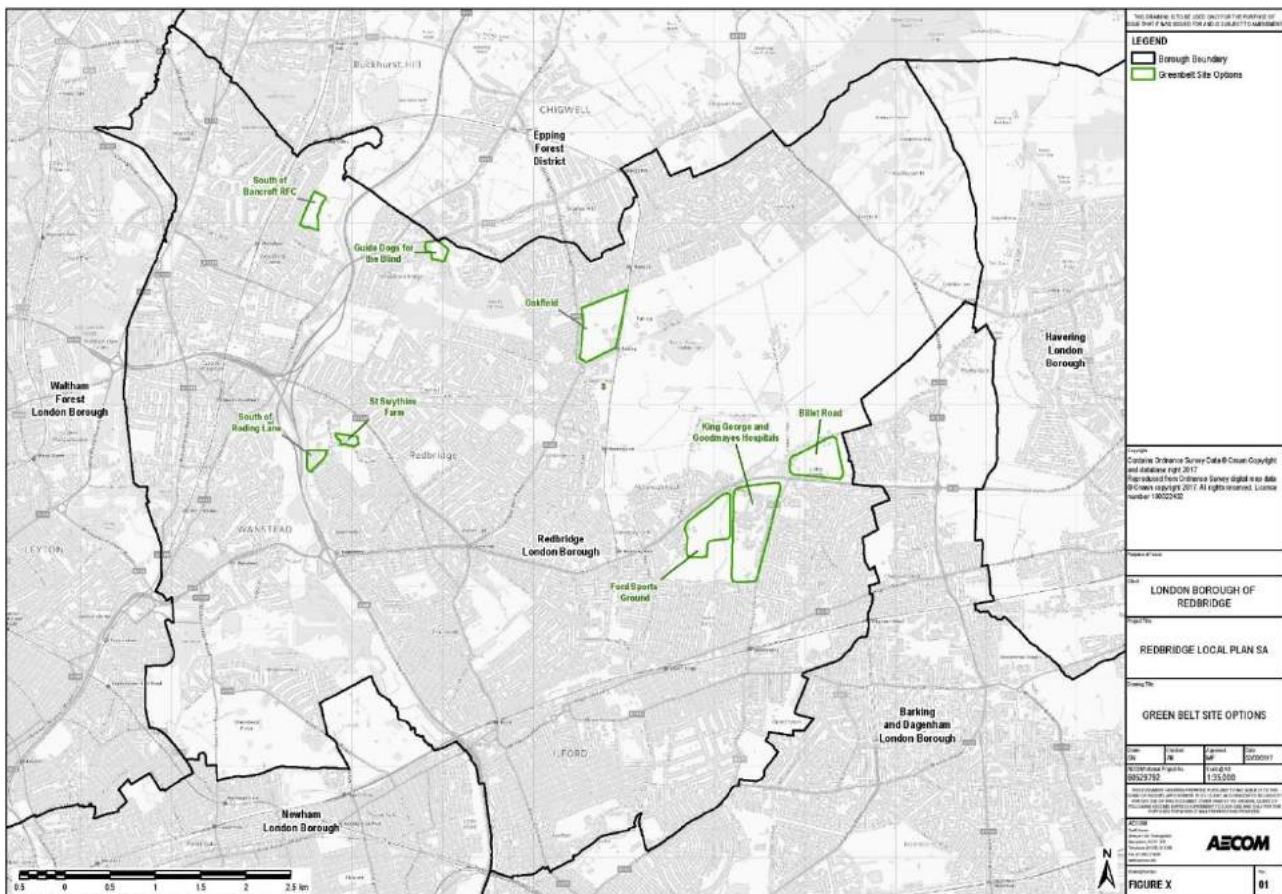
**Developing refined spatial strategy alternatives (2016/17)**

2.5.2 In light of the representations received, and in particular the representation submitted on behalf of the London Mayor, the Council recognised a need to undertake some further evidence-gathering work, to feed into further consideration of spatial strategy alternatives. Five work-initial streams were progressed -

- 1) Development Opportunity Sites Update (i.e. update to Appendix 1 of the Local Plan)
- 2) Transport Study
- 3) Playing Fields Feasibility Study (for Oakfield and the Ford Sports Ground)
- 4) Green Belt Review Addendum
- 5) Appraisal of Green Belt sites (as part of the SA process).

2.5.3 With regards to (5), the sites subjected to appraisal can be seen in the figure below.

*Figure 2.2: Green Belt site options subject to appraisal*



2.5.4 In light of these five work-streams, the Council (in discussion with AECOM) was able to arrive at a set of refined spatial strategy alternatives (i.e. a refinement of those previously considered within the SA Report in 2016). The 2017 reasonable alternatives are presented below in **Table 2.2**. Explanatory text is then presented in **Box 2.4**.

*Spatial-strategy-related appraisal findings (2017)*

2.5.5 Appraisal findings, in relation to the refined spatial strategy alternatives introduced above, were presented within the Interim SA Report (2017) presented to the Council ahead of submission, and then submitted alongside the plan and SA Report (LBR 1.11.2) to the Secretary of State. **Table 2.3** presents summary appraisal findings.

*Table 2.2: The reasonable alternatives (2017)*

		Option 1 – Higher urban densification / no GB release	Option 2 – Urban densification / GB release	Option 3 – Higher urban densification / GB release	Option 4 – Higher urban densification / higher GB release
Windfall		2,700	2,700	2,700	2,700
Investment and Growth Areas	Ilford	6,623	6,063	6,623	6,623
	Crossrail Corridor	3,502	2,897	3,502	3,502
	Gants Hill	634	573	634	634
	South Woodford	596	487	596	596
	Barkingside	593	514	593	593
Rest of the Borough		3,965	2,938	3,965	3,965
Green Belt	King George/Goodmayes	0	500	500	500
	Fords Sports Ground	0	851	851	851
	Billet Road	0	800	800	800
	Oakfield	0	614	614	614
	Omission sites x4	0	0	0	728
<b>Total</b>		<b>18,613</b>	<b>18,937</b>	<b>21,378</b>	<b>23,106</b>
<b>% above LP target</b>		<b>10.5</b>	<b>12.4</b>	<b>26.9</b>	<b>31.2</b>

*Box 2.4: Further explanation of the 2017 reasonable alternatives***Option 1 - Higher urban densification / no GB release**

A key consideration, when developing reasonable alternatives for appraisal in late 2016 /early 2017, was a desire to test the option advocated by the GLA, which is an approach that seeks to exhaust all densification opportunities and avoid removing land from the Green Belt. The London Plan target would be exceeded by 10.5%.

**Option 2 - Urban densification / GB release**

This option comprised the Pre-Submission strategy (2016) modified to account for revised densities, several new sites and lower yield from Billet Road. It involved taking a 'balanced' approach to urban densification, with the corollary that Green Belt release is necessary. The London Plan target would be exceeded by 12.4%.

N.B. An option involving this approach to densification plus nil Green Belt release would fall 673 homes (4%) short of the London Plan target, and hence was deemed an unreasonable option.

**Option 3 - Higher urban densification / GB release**

Numerous other options for meeting / exceeding the London Plan housing target could be envisaged. Indeed, it was recognised that all of the options appraised in 2016 (see Table 2.1, above) remained *potentially* reasonable.

However, given a desire to reduce the number of alternatives to a reasonable and manageable level, the decision was taken in early 2017 not to explore options involving different combinations of sites, in the manner of the 2016 alternatives. Rather, it was determined appropriate and reasonable to assume a binary choice to be made in respect of the Pre-Submission Green Belt housing sites: 1) allocate all four sites to deliver 2,765 homes; or 2) allocate none of the sites. This decision was taken in light of the additional evidence-gathering work completed in late 2016 / early 2017, which did not serve to assign a clear order of preference to the sites.

This assumption led to Option 3, which would involve both maximum urban densification (as per Option 1) plus allocation of the Pre-Submission Green Belt sites (as per Option 2). The London Plan target would be exceeded by 26.9%.

**Option 4 - Higher urban densification / higher GB release**

Finally, it was determined appropriate to define a higher growth option, which would involve further seeking to close the gap between housing supply and housing needs. Given the findings of the Council's work to review density at Development Opportunity Sites there was no potential for additional homes on non-Green Belt sites (i.e. a quantum over-and-above Options 1 and 3), hence the only option would be to find additional capacity from Green Belt sites. These considerations led to the definition of Option 4. The London Plan target would be exceeded by 31.2%.

As for the choice of Green Belt sites, it was determined reasonable to assume that the four omission sites that were being actively promoted would be allocated.<sup>4</sup> Again, given a desire to reduce the number of alternatives to a reasonable and manageable level, the decision was taken not to explore options involving different combinations of sites. Rather, it was deemed reasonable to assume a binary choice to be made in respect of the omission sites, i.e. either 1) allocate all four to deliver 728 homes; or 2) allocate none.<sup>5</sup>

**Other options?**

The Council and AECOM recognise that a further option could have been considered, namely the option of "Urban densification / higher GB release".

<sup>4</sup> GB08 (part) S of Bancroft Rugby Football Club, Woodford; GB11b (part) St Swythin's Farm; GB11 (part) S of Roding Spire Hospital; GB12 (part) Guide Dogs for the Blind. N.B. this approach was a departure from that taken in 2016, when it was assumed that Green Belt sites in contention, other than the four proposed for release/development through the Plan, would likely fall within the Fairlop Plan.

<sup>5</sup> This decision was taken despite St. Swythin's Farm standing-out as not meeting the Green Belt purposes.



Table 2.3: Summary alternatives appraisal findings (2017)

SA topic	Reasonable alternatives ranked and with significant effects highlighted			
	Option 1) Higher urban densification / no GB release = 18,613 homes	Option 2) Urban densification / GB release = 18,937 homes	Option 3) Higher urban densification / GB release = 21,378 homes	Option 4) Higher urban densification / higher GB release = 23,106 homes
Poverty	4	★1	2	3
Crime	=	=	=	=
Housing	4	3	2	★1
Education	4	★1	2	3
Services	4	★1	2	3
Healthy lifestyles	=	=	=	=
Landscapes/ townscapes	2	★1	2	4
Biodiversity	★1	★1	★1	4
Traffic	★1	★1	3	4
Climate change	2	2	★1	2
Waste	=	=	=	=
Economic growth	4	3	2	★1
Incomes	=	=	=	=
Business	=	=	=	=
Transport	★1	★1	★1	4

In **conclusion**, the appraisal finds **Option 2** to perform well in terms of the greatest number of objectives; however, this options performs less well – relative to the two higher growth options - in respect of housing and economic growth. **Option 3** also performs quite well, with no significant negative effects predicted; however, higher urban densification would have implications for townscape/character, and also access to services/facilities. Options 1 and 4 are the more extreme options, and this is reflected in the appraisal. **Option 1** would result in significant negative effects in terms of ‘education’ as nil Green Belt release would result in a shortfall in secondary school provision; however, lower growth in Redbridge is potentially to be supported from a ‘biodiversity’ and ‘traffic’ perspective. **Option 4** is a high growth option that would result in significant negative effects in terms of ‘landscape/townscape’; however, higher growth is potentially to be supported from a ‘housing’ and ‘economic growth’ perspective (albeit there is uncertainty, e.g. given traffic).

**2.6 Proposed Modifications (2017)**

2.6.1 Examination hearings were held between 6<sup>th</sup> June and 20<sup>th</sup> July 2017, subsequent to which the Inspector wrote to the Council, providing ‘post hearing advice’ in two parts -

- Post Hearing Advice: Part 1 (IED011) - provided advice in respect of “certain individual policies within the RLP”.
- Post Hearing Advice: Part 2 (IED012) - dealt with two Green Belt ‘Opportunity Sites’ proposed for allocation by the Local Plan; namely Oakfield and Ford Sports Grounds. The Inspector stated -

*“From the evidence provided I am not satisfied that there are exceptional circumstances to warrant altering the Green Belt boundary so as to allocate these sites as Opportunity Sites. As part of this finding my view is that it has not been demonstrated that playing pitch provision would meet estimated demand across the Borough in 2030 if Oakfield and Ford were developed. Overall this part of the plan would not achieve sustainable development and so is potentially unsound... My advice is therefore that the Council includes main modifications to omit Oakfield and Ford Sports Ground as Opportunity Sites in the RLP.”*

2.6.2 Following receipt of post hearing advice, the Council prepared a list of Proposed Modifications to the submitted plan, and agreed these with the Planning Inspector. Proposed Modifications were then published for consultation alongside an **SA Report Addendum**. Proposed Modifications relating to the spatial strategy are summarised in **Table 2.4**.

Table 2.4: Summary of changes to the spatial strategy (2017)

Investment and growth area	Homes	Empoym’t (m <sub>2</sub> )	Jobs	Retail (m <sup>2</sup> )
Ilford	-700 [through accommodating mixed use]	-1,000	+1,000	+15,000
Crossrail Corridor	+150 [-850 through loss of Ford Sport Ground; +1,000 at remaining sites through some higher density & accommodating mixed use]	-12,700	-400	+5,000
Gants Hill	No change	-7,400	+100	+3,000
South Woodford	-220 [through accommodating employment]	+1,100	+500	+1,500
Barkingside	-900 [- 600 through loss of Oakfield and then - 300 at remaining sites through accommodating mixed use]	-5,000	-75	-3,000
<b>Total</b>	<b>-1,670</b> [-1,450 through loss of Oakfield and Ford; and -220 at remaining sites through accommodating mixed use]	<b>-25,000</b>	<b>+1,125</b>	<b>+21,500</b>

- 2.6.3 The aim of the SA Report Addendum was essentially to present an appraisal of the Proposed Modifications, with a view to informing the consultation. It is worth noting that the SA Report Addendum did not include information on 'reasonable alternatives', with the following explanation presented -

*"When developing proposed modifications the Council (working with the Inspector) was not presented with a need to appraise alternatives, given: A) alternatives appraisal work completed prior to submission; and B) understanding generated through the Examination, as reflected within the Inspector's post hearing advice notes (IED011/12)... Whilst alternatives to... [removal of the Oakfield and Ford Sports Grounds Opportunity Sites from the RLP] can be envisaged, there is little reason to identify any alternative strategy as 'reasonable' and hence warranting detailed examination."*

- 2.6.4 The appraisal conclusions are presented in **Box 2.5**. N.B. the appraisal sought to cover both *the Proposed Modifications* (recognising that only Proposed Modifications were the subject of the consultation) and also *the Plan as modified by Proposed Modifications* (thereby updating the appraisal findings presented within the SA Report).

*Box 2.4: Conclusion of the appraisal of Proposed Modifications (2017)*

"The proposal to remove the Oakfield and Ford Sports Ground Opportunity Sites, and thereby follow a lower housing growth strategy (exceeding the London Plan housing target by 2%), is supported in terms of 'Health' objectives in particular, as the result will be confidence regarding the capacity of sports pitch provision in the Borough. The proposal has positive implications for a range of specific groups, including the South Asian community (South Asian League cricket is growing and currently accounts for at least 35% of the cricket playing population); and, more broadly, is supportive of work to promote social cohesion and inclusion, such as the significant Inter Faith work being undertaken by Essex Cricket in Redbridge. As such, the proposal has positive implications from an Equalities perspective.

However, the proposal has drawbacks in terms of other objectives, with higher housing growth supported in terms of 'Housing' and (to a lesser extent) 'Economy' objectives. Both sites are suitable for development in some respects. Notably, Oakfield benefits from proximity to Barkingside District Centre, Fairlop underground station, leisure facilities, and open space at Fairlop Country Park. It is also the case that both sites would have delivered new community infrastructure, to include two new secondary schools and a health facility; however, there is little reason to suggest that removing these sites from the strategy will lead to a shortfall in infrastructure capacity. This is particularly the case given the proposal to strengthen site specific and development management policy relating to infrastructure delivery.

Another important matter is the proposal to adjust the housing density/yield at various Opportunity Sites, and in turn adjust the amount of employment and retail supported, following the Council's "Review of Appendix 1: Development Opportunity Sites" (LBR 2.06). Most notable are the proposals to: A) decrease housing units / increase retail floorspace within Ilford Town Centre; and B) increase housing units / decrease employment floorspace within the Crossrail Corridor. The changes in housing numbers / floorspace respond to the re-assessment of all individual site capacities and fuller consideration of non-residential uses. As such, it is difficult to conclude on strategic implications for sustainability objectives. The decrease in employment floorspace is notable; however, any concerns are somewhat allayed by the proposal to bolster Policy LP14 (Stimulating Business and the Local Economy). The effect of proposed modifications to LP1 (Spatial Development Strategy) will be to support 1,125 additional jobs overall (albeit reduced jobs are supported in the Crossrail Corridor and Barkingside Investment and Growth Areas), despite the reduced area of employment floorspace.

With regards to 'submission plan plus proposed modifications', the overall conclusions presented within the 2016 SA Report (see Box 2.3, above) broadly holds true for 'the submission plan plus proposed modifications'. The strategy can still be described as 'positive', e.g. recognising the proposed approach of increasing housing delivery in the urban areas; however, it is the case that the Oakfield and Ford Sports Ground Opportunity Sites are no longer proposed for release from the Green Belt, and, in turn, there is less of a focus of growth within the Crossrail Corridor and Barkingside Investment and Growth Areas. Concerns regarding the achievement of housing objectives are allayed by the Inspector's conclusion that it is appropriate to provide for a total quantum of homes 2% above the London Plan target, and also given proposed strengthening of site-specific and development management policy wording, in particular in respect of delivering affordable housing, family housing and social infrastructure."

## 2.7 Plan finalisation (2018)

- 2.7.1 The Inspector's report into the soundness of the Local Plan was received on 24<sup>th</sup> January 2018. The report concludes that the plan is sound, provided that modifications are made.
- 2.7.2 The Inspector's Report concludes that the modifications that should be made to the plan are broadly those published for consultation in 2017 (see para 2.6.2, above).
- 2.7.3 The Inspector's Report goes on to discuss 13 key issues, including the following, which are of particular note as they were a focus of SA work over the years (including as reported in the 2016 SA Report, the 2017 Interim SA Report and the 2017 SA Report Addendum, all of which the Inspector had before him when writing his report) -
- 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?
    - *“... 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 4 - Is the **housing requirement** justified, will there be a sufficient supply of housing over the plan period, will there be a five year supply of housing sites and is the overall target for affordable housing and the type of tenure justified?
    - *“An increase in densities in suburban areas is not supported by the London Plan... Furthermore, the option of higher density in the Western Corridor was considered as part of the SA process and discounted... 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...”*
  - 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?
  - Issue 6 - Are there **exceptional circumstances** that warrant altering the Green Belt boundary?
    - *“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.”*
  - Issue 7 – What is the effect of deleting the strategic allocations at **Oakfield and Ford Sports Ground**?
    - *“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...”*

- 2.7.4 The Inspector's Report also includes a short section presenting a commentary on the SA process, finding that -

*"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. 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'.*

*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."*

### 3 MEASURES DECIDED CONCERNING MONITORING

- 3.1.1 In accordance with the SEA Regulations, this SA Statement must present 'measures **decided** concerning monitoring', building on the 'measures **envisaged** concerning monitoring' presented within the SA Report (2016) and SA Report Addendum (2017).

- 3.1.2 The SA Report (2016) stated the following, in respect of the monitoring indicators proposed within the Proposed Submission Plan (2016) -

*"From an SA perspective, in light of the draft plan appraisal presented in Part 2 of this report, it is good to see that there is a focus on monitoring not just via analysis of planning applications, but also monitoring of the environmental and socio-economic baseline itself. For example, there is a commitment to monitor: "Change in areas and populations of biodiversity importance, including... Change in priority habitats and species (by type)". One additional issue that could benefit from monitoring, given the likely effects of the plan (or at least given the uncertainties) is the matter of playing pitch and sports facility provision, taking into account quality as well as quantity."*

- 3.1.3 Issue 13 dealt with within the Inspector's Report relates to the question: *Does the Local Plan have clear and effective mechanisms for implementation, delivery and monitoring?* The Inspector reaches the following conclusion -

*"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."*

- 3.1.4 Appendix 3 ("Monitoring Framework") is repeated below, as **Appendix I**.



**4 CONCLUSIONS ON THE SA PROCESS**

- 4.1.1 This SA Statement demonstrates that a robust SA process has been progressed alongside plan-making, with appraisal findings feeding in to decision-making at numerous junctures, and several reports having been published for consultation alongside plan documents, in order to help ensure informed and effective consultation.
- 4.1.2 In summary, the following reports were published as part of the SA process -
  - One Interim SA Report under Regulation 18 (2013)
  - The SA Report published under Regulation 19 (2016)
  - An Interim SA Report post publication / prior to submission (2017)
  - The SA Report Addendum (2017) published alongside Proposed Modifications
- 4.1.3 This SA Statement is the final step in the SA process. Its aim is to explain the ‘story’ of the plan-making / SA process, and also present measures decided concerning monitoring. Also, this report is prepared for the benefit of Elected Members of the London Borough of Redbridge, who are tasked with making a decision regarding adoption of the Plan.
- 4.1.4 The Regulations require that this report presents certain information. **Table 4.1** serves to demonstrate that this report does present the required information.

*Table 4.1: Regulatory checklist*

The SA Statement must...	How has this report presented the required information?
Summarise how environmental (and wider sustainability) considerations have been integrated into the plan	This report has sought to provide examples of key sustainability considerations that have been highlighted through appraisal and consultation at each of the main stages of the plan-making / SA process. The appraisal of spatial strategy alternatives, in particular, served to highlight a range of significant negative effects, enabling the Council to then take steps to avoid (by selecting a better performing strategy) or mitigate the effect (through development management and/or site specific policy).
Summarise how the SA Report and consultation responses received, as part of the Draft Plan / SA Report consultation, have been taken into account when finalising the plan.	<p>Examples of key messages received through consultation responses in 2014 and 2016 are presented above. Issues raised through the 2014 consultation, and the Council’s response, are summarised in the Council’s Consultation Statement (see <a href="https://www.redbridge.gov.uk/media/3042/lbr-113-consultation-statement-22-1-c-feb-2017.pdf">https://www.redbridge.gov.uk/media/3042/lbr-113-consultation-statement-22-1-c-feb-2017.pdf</a>). Also, issues raised through representations in 2016 are summarised here: <a href="https://www.redbridge.gov.uk/media/3313/lbr-1011-redbridge-local-plan-reg-19-representations.pdf">https://www.redbridge.gov.uk/media/3313/lbr-1011-redbridge-local-plan-reg-19-representations.pdf</a>.</p> <p>Consultation responses received in 2014 were taken into account when preparing the Proposed Submission Plan, whilst 2016 consultation responses were taken into account by the Inspector (also alongside points raised during the examination, and consultation responses received on Proposed Modifications / the 2017 SA Report Addendum) when deciding on necessary modifications to the plan as submitted.</p>
Summarise the reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with.”	<p>The SA Report (2016) presented the Council’s reasons for supporting the Proposed Submission Plan (see Box 2.2, above).</p> <p>The Inspector’s Report (2018) presents the Inspector’s reasons for supporting the final plan (see Section 2.7, above).</p>

**APPENDIX I - THE MONITORING FRAMEWORK**

Presented below is Appendix 3 of the Local Plan, which presents the agreed Monitoring Framework.

Strategic Objective	Local Plan Policy (LP)	Local Plan Indicator	Target	Delivery Agency
<b>Theme 1 – Promoting and Managing Growth</b>				
SO1	LP1 – LP 17	<p>1a – Amount of floorspace developed for employment by type</p> <p>1b – Amount of floorspace developed for employment by type, by Investment and Growth Area.</p> <p>1c - Amount of floorspace by employment type, which is on previously developed land.</p> <p>1d – Employment land available by type</p> <p>1e - Losses of employment land in (i) development/regeneration areas and (ii) town centres.</p> <p>1f - Amount of employment land lost to residential development.</p> <p>1g Numbers of hot food takeaways, betting shops, shisha bars, and payday lenders within each local / town centre.</p> <p>1h Number of hotels in borough.</p> <p>2a (i) Net additional dwellings over the previous five year period or since the start of the relevant Local Plan period, whichever is the longer;</p>	<p>Protecting existing employment land for a full range of business and commercial activities.</p> <p>Facilitating business growth in the borough with the provision of a minimum of 21,206m2 of new B1 space for SME's</p> <p>Making provision for a minimum of 23,911sqm of comparison retail floorspace by 2030.</p> <p>Making provision for a minimum of 8,562sqm of convenience retail floorspace by 2030.</p> <p>Enhancing the quality of Ilford's retail offer more benefitting its Metropolitan Town Centre Status</p> <p>Delivering a minimum of 1,123 new dwellings per year.</p> <p>Delivering at least 35% or 393 new affordable homes per year.</p> <p>Delivering all new build housing as M4(2) or M4(3) accessible dwellings.</p>	<p>LBR Planning &amp; Regeneration Service</p> <p>LBR Property Service</p> <p>Development industry</p> <p>Registered Providers</p> <p>Private Landlords</p> <p>GLA</p> <p>Land Owners</p> <p>LBR Housing Service</p> <p>Town Centre Management</p> <p>Business</p>



Strategic Objective	Local Plan Policy (LP)	Local Plan Indicator	Target	Delivery Agency
		<p>(ii) Net additional dwellings for the current year;</p> <p>(iii) Projected net additional dwellings up to the end of the relevant Local Plan period or over a ten year period from its adoption, whichever is the longer;</p> <p>(iv) The annual net additional dwelling requirement; and</p> <p>(v) Annual average number of net additional dwellings needed to meet overall housing requirements, having regard to the previous year's performances.</p> <p>2b - Percentage of new and converted dwellings on previously developed land.</p> <p>2c - Percentage of new dwellings completed with densities in dwellings per hectare:            (i) Below the London Plan density range;            (ii) Within the London Plan density range; and            (iii) Above the London Plan density range.</p> <p>2d Number of Affordable housing completions in all new developments.</p> <p>2e – Number of M4(2) accessible dwelling completions (new build and overall).</p>	<p>Delivering at least 10% of new build housing as M4(3) wheelchair user dwellings per year.</p> <p>No more than 14.45 hectares of industrial land to be released from employment use over the plan period.</p> <p>Making provision for all housing needs including the provision of 7 additional Gypsies and Traveller pitches to 2030.</p> <p>Net reduction in the number of empty properties</p> <p>At least 50% of housing completions to have 3 or more bedrooms. Resisting the loss of larger family sized housing in the boroughs housing stock</p> <p>Increasing the numbers of bedspaces (visitor accommodation) in the borough to help promote Redbridge as a destination for leisure and tourism</p> <p>Provision of new community infrastructure in a timely and efficient manner in appropriate locations to support population,</p>	<p>Partnership</p> <p>Local Business</p> <p>Local Quarry Operators</p> <p>LBR Children's Services</p> <p>LBR Library Service</p> <p>Public Health Authority</p>

Strategic Objective	Local Plan Policy (LP)	Local Plan Indicator	Target	Delivery Agency
		<p>2f – Number of M4(3) accessible wheelchair user dwelling completions (new build and overall).</p> <p>2g – Number of non-commenced dwelling approvals</p> <p>2h – Number of dwelling units under construction</p> <p>2i – Number of dwelling units started</p> <p>2j – Dwelling completions by tenure and number of bedrooms</p> <p>2k(i) Average density of residential approvals (ii) Average density of residential completions</p> <p>2l – Number of empty properties brought back into use</p> <p>2m Number of specialist accommodation units (i) approved and (ii) completed by type</p> <p>2n Number of dwellings conversions</p> <p>2o Number of new Buildings in Multiple Occupation</p> <p>2p Number of new hotel, guest house bed spaces</p>	<p>housing, employment and economic growth, in accordance with Appendix 2 of the Local Plan and the Infrastructure Delivery Plan.</p> <p>Tenure - 60% social rented/affordable rented and 40% Intermediate</p>	

Strategic Objective	Local Plan Policy (LP)	Local Plan Indicator	Target	Delivery Agency
		<p>4a - Amount of completed retail, office and leisure development.</p> <p>4b - Amount of completed retail, office and leisure development in town centres.</p>		
<b>Theme 2 – Promoting a Green Environment</b>				
SO2	LP19–LP 25	<p>3a - Amount of completed non-residential development within UCOs A, B and D complying with car-parking standards set out in the local Plan.</p> <p>3b - Amount of new residential development within 30 minutes public transport time of: a GP; an A&amp;E department; a primary school; a secondary school; areas of employment; and a major retail centre(s).</p> <p>3c – Number of jobs within a 45 minute public transport journey of each local centre and town centre (as measured in the AM peak).</p> <p>4c - Amount of eligible open spaces managed to Green Flag Award standard.</p> <p>7 - Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality.</p> <p>8- Change in areas and populations of biodiversity importance, including: (i) Change in priority habitats and species (by type); and (ii)Change in</p>	<p>Maintain 2.9ha of green space per 1000 persons in Redbridge to ensure residents quality of life and access to open space.</p> <p>Maintain at least 50 per cent of net B1 additional floorspace in PTAL Zones 5-6</p> <p>Annual average % carbon dioxide emissions savings for strategic development proposals progressing towards zero carbon in residential developments by 2020 and in all developments by 2022</p> <p>No net loss of Sites of Importance for Nature Conservation</p> <p>No net loss of open space designated for protection in the Local Plan due to new development</p> <p>Provide an annual increase in the number of jobs available within 45 minutes of each</p>	<p>LBR Planning &amp; Regeneration Service</p> <p>LBR Nature Conservation Team</p> <p>RSP Environment Partnership</p> <p>Crossrail</p> <p>GLA/TfL</p> <p>Environment Agency</p> <p>Thames Water</p> <p>Sustrans</p>

Strategic Objective	Local Plan Policy (LP)	Local Plan Indicator	Target	Delivery Agency
		<p>areas designated for their intrinsic environmental value including sites of international, national, regional, sub-regional or local significance.</p> <p>9 - Renewable energy capacity installed by type.</p> <p>10 - Levels of the following pollutants: PM2.5 particulates, PM10 particulates, Carbon Monoxide, Nitrogen Dioxide, Oxone, Sulphur Dioxide.</p>	<p>local centre and town centre.</p> <p>Reduce dependence on the private car, minimising greenhouse gases from vehicle emissions and improving air quality</p> <p>Promoting walking, cycling, and use of public transport</p> <p>Maintaining tree coverage within the borough is maintained and in areas of deficiency, increased.</p> <p>Net reduction in annual average, hourly peak, and daily peak readings of all monitored pollutants.</p>	<p>Network Rail</p> <p>City of London as the Conservators of Epping Forest</p> <p>Corporation of London</p> <p>London Air Quality Network &amp; LBR Community Safety Service Pollution &amp; Public Health Team</p>
<b>Theme 3 – Achieving Design Quality</b>				
SO3	LP26-LP33	<p>Delivery of high quality mixed-use developments</p> <p>Number and location of tall buildings</p> <p>Number of all assets on the Heritage at Risk</p>	<p>Promoting good design in all new development schemes.</p> <p>Review of quality of tall buildings provided within the borough, undertaking Building for</p>	LBR Planning & Regeneration Service

Strategic Objective	Local Plan Policy (LP)	Local Plan Indicator	Target	Delivery Agency
		<p>Register.</p> <p>Number of conservation areas with up to date character appraisals and management plans.</p> <p>Number and location of tall buildings approved.</p> <p>Planning/Listed Building Consent applications for Listed Buildings approved in accordance with the advice of Historic England</p> <p>Number of basement applications</p>	<p>Life assessments.</p> <p>Review of design quality through assessment of completed schemes, including Building for Life assessments and monitoring of active ground floor uses within major developments over 50 units.</p> <p>Heritage assets within the borough are conserved and enhanced in a manner appropriate to their special interest, character or appearance and significance.</p> <p>Annual reduction in the number of assets on the Heritage at Risk Register.</p> <p>Ensuring development makes a positive contribution to place making and local distinctiveness.</p> <p>Tall buildings are appropriately located and well integrated into the urban fabric and are suitable to their location.</p> <p>Shopfronts and signage respects the overall character and appearance of the building and the street scene generally.</p> <p>Sustainable design and construction</p>	<p>Development Industry</p> <p>GLA</p>

Strategic Objective	Local Plan Policy (LP)	Local Plan Indicator	Target	Delivery Agency
			techniques are used in all new developments.	
<b>Theme 4 – Protecting and Enhancing the Borough’s Assets</b>				
SO4	LP34-LP40	<p>8 - Change in areas and populations of biodiversity importance, including: (i) Change in priority habitats and species (by type); and (ii) Change in areas designated for their intrinsic environmental value including sites of international, national, regional, sub-regional or local significance.</p> <p>Number of Planning applications affecting sites of biodiversity importance.</p>	<p>No net loss of Green Belt and Metropolitan Open Land.</p> <p>No net loss of allotment sites.</p> <p>No net loss of international, national and local sites of nature conservation importance including SSSIs covering Epping Forest, Wanstead Flats and Hainault Forest.</p> <p>Protection of Sites of Metropolitan Importance for Nature Conservation (SMI's) covering the River Roding and Seven Kings Water Corridor.</p> <p>The quality of open spaces and public access to them is improved through new development opportunities and as part of the wider All London Green Grid network.</p> <p>No net loss of open spaces in areas of high open space deficiency.</p> <p>Promotion of a quality network of accessible</p>	<p>LBR Planning &amp; Regeneration Service</p> <p>LBR Leisure Services Sport England</p> <p>Natural England</p> <p>Historic England</p> <p>City of London as the Conservators of Epping Forest</p> <p>Corporation of London</p>

Strategic Objective	Local Plan Policy (LP)	Local Plan Indicator	Target	Delivery Agency
			<p>green spaces across the borough to benefit biodiversity and provide opportunities for outdoor recreation for residents.</p> <p>Maintain tree coverage in the borough and increase provision in areas of deficiencies.</p>	
<b>LP41 – Monitoring and Delivery</b>				
		<p>Number of relevant new infrastructure programmes completed</p> <p>Amount of Planning Obligations/CIL secured and spent, and by type</p> <p>Percentage of planning applications processed in 8 weeks (Minor)</p> <p>Percentage of planning applications processed in 8 weeks (Other)</p> <p>Percentage of major planning applications determined within 13 weeks</p> <p>Number of enforcement notices issued</p> <p>Number of appeals against non-determination made</p> <p>Number of appeals against non-determination upheld</p>	<p>65% of major planning applications to be determined within 13 weeks</p> <p>65% of minor planning application to be determined within 8 weeks</p> <p>80% of other planning applications to be determined within 8 weeks</p> <p>Delivery of key infrastructure programmes as set out in the Infrastructure Delivery Plan</p> <p>Continuous partnership working and cross-boundary working</p> <p>Production of Authority Monitoring Report to measure the effectiveness of the Local Plan.</p>	

Strategic Objective	Local Plan Policy (LP)	Local Plan Indicator	Target	Delivery Agency
		<p>Number of appeals against refusals made</p> <p>Number of appeals against refusals that are upheld</p> <p>Completion of Annual Monitoring Report (including review of LDS milestones)</p> <p>Numbers of apprenticeships, job brokerage agreements, and contributions relating to skills and training through Section 106 agreements</p>		