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Dear Mayor Khan,

Draft New London Plan

Thank you for consulting the London Borough of Redbridge on the draft New London Plan, which the Council welcomes the opportunity to comment on. The New London Plan represents a significant step change in the Mayor's approach to strategic planning. It looks across a number of different strategies including transport, housing, economic activity, the environment, health inequalities, culture and crime and policing. This coordinated approach is very much welcomed by the Council.

Following a significant period of preparation, consultation and examination, the Council will be presenting its Local Plan to Full Council for adoption at its meeting on 15th March. Having an up to date Local Plan is key to delivering sustainable development that reflects the vision and aspirations of the Council and its communities, ensuring the right type of development is delivered, at the right time and in the right place. Through the development of our Local Plan we have developed a keen understanding of many of the issues highlighted within the London Plan and we have drawn upon this experience in developing our response to the consultation.

The Mayor's overall approach is similar to our new Local Plan which seeks to set out how growth can be managed in a sustainable manner. Our vision is concerned with managing growth and investment, economic vitality and prosperity for all, connectivity, celebrating open spaces and enhancing historic assets. We have developed objectives and policies to ensure that the vision can be achieved, and collectively they reflect the economic, social and environmental dimensions of sustainable development set out in the NPPF.

Overall the Council welcomes the Mayor's ambitious London Plan which will serve as a blueprint for the future development and sustainable, inclusive growth of London.

We particularly welcome the good growth principles, the continued focus on Opportunity Areas reflecting our own ambitious plans for the regeneration of Ilford, the range of housing policies to address London's housing crisis, strong town centre first policies, the continued protection of strategic industrial land, an increased emphasis on training and skills and the strong sustainability and transport policies to help make London more efficient and resilient.

This letter forms the Council's response to the consultation.

Part one focuses on the issues of strategic importance to Redbridge, namely the draft Plan's spatial development strategy, the Mayor's approach to green belt, the impact of small sites intensification, the provision of infrastructure and overall delivery of the Plan's policies and proposals. Detailed comments in relation to specific policies are set out in Part 2.

We welcome the opportunity to engage further with the GLA on the matters raised in our submission prior to examination of the New London Plan. Finally, I would note that we would like to participate in the examination hearings anticipated to take place later in the year.

If you would like to discuss any aspect of the submission or require further information please don't hesitate to contact my officers on the above details.

Yours sincerely,

Cllr Helen Coomb

Cabinet Member for Regeneration Property and Planning

1. Key issues for Redbridge

The Council supports and welcomes the concept of 'Good Growth' - planning for growth on the basis of its potential to improve the health and quality of life of all Londoners, to reduce inequalities and to make the city a better place to live, work and visit. We believe that adopting such cross cutting growth principles are fundamental in managing the substantial growth expected over the London Plan period.

The concept of good growth accords with our Local Plan vision and objectives of inclusive and sustainable growth. Our Local Plan recognises that Redbridge is growing at a fast pace and as such we have developed a spatial strategy that sets out how this can be proactively managed in a sustainable manner.

We support Policies GG1 to GG6 which set out the broad policy approach to achieving 'Good Growth'. However, there is the potential for conflict between these and some policies relating to housing growth, transport and employment. In particular, there is tension between delivering the high housing targets whilst maintaining the quality of life of existing residents as well as maintaining the position on no net loss of industrial land across London.

Spatial Development Patterns

The draft London Plan places a renewed focus on Opportunity Areas linked together by transport corridors which is welcomed and supported. The Mayor expects delivery of substantial numbers of new homes including affordable housing and jobs in these areas. Further, representing a particular step change, the plan gives explicit reference to outer London where the suburban pattern of development is considered to have significant potential for appropriate intensification over time, particularly for housing. The Council is concerned that a growth strategy focused so strongly on intensifying existing urban areas and suburbs to deliver housing has the potential to undermine efforts to secure the necessary supporting social and community infrastructure, creating places that do not function as sustainable places for people to live. It is difficult to see how these ambitions will be achieved without very high levels of intervention in these areas e.g. large site assembly efforts to secure school sites.

Paragraph 2.03 of this section needs to recognise that the changing nature of the suburbs continues to be a key concern for communities. It is imperative that existing communities feel comfortable with local changes and that new developments are desirable places to live and work. This is a particular issue which the Council has had to manage in the development of its own Local Plan. The level of growth proposed within Redbridge is of concern to our residents and what is being proposed in the London Plan will further exacerbate this, particularly from an infrastructure perspective. Existing character of areas is valued and important and the Council believes the new London Plan needs to have this at the centre of the strategy to accommodate future growth.

In the examination of our Local Plan, the Inspector acknowledges that the Council's vision of managing growth and investment and overall spatial strategy is supported by comprehensive evidence of the needs and opportunities facing the borough. Directing investment and growth to Ilford, the wider Crossrail Corridor, Gants Hill, Barkingside and South Woodford, the main town centres and other identified Opportunity Sites is fully in line with the NPPF. Overall he concludes that the strategy set out in the Plan of focusing development in Investment and Growth Areas across the borough with some release of green belt land is sound and appropriate for the future of Redbridge. Our comments on the draft London Plan are made within this context.

Various options to help meet the borough's minimum housing target to help close the gap were looked at as part of the Local Plan sustainability appraisal work. This involved testing various growth options or reasonable alternatives to arrive at the most sustainable option for the borough. One of the options considered was higher intensification and no green belt release which sought to exhaust all densification opportunities and avoid removing land from the green belt. It is considered that this option essentially reflects the Mayor's proposal in the draft London Plan. Whilst it performed well against housing objectives, this option showed a negative impact upon townscape, character and the ability to deliver much needed infrastructure. The Council's preferred strategy, densification in appropriate locations alongside managed release of green belt, was considered to be a more balanced approach.

Opportunity Areas

Policy SD1 sets the Mayor's spatial direction for how London is going to grow. Ilford Opportunity Area (OA) is located within the Elizabeth Line East Growth Corridor with the capacity to deliver 6,000 new homes and 500 new jobs. The status given to Ilford within the Elizabeth Line East Corridor is that it's ready to grow, its development potential has been identified and approved and the infrastructure is planned.

The Council fully supports the Mayor's vision for Ilford and is already working to bring this growth forward at pace. Alongside the efforts to get an up-to-date Local Plan in place, the Council has worked with local stakeholders to develop the Ilford Manifesto and subsequent Ilford Development Prospectus which both provide a strong message that the borough is open for business. Alongside this we are proactively working with landowners to bring sites forward, including Council owned, to increase the supply of much needed housing. The impact of this focus is clear to see with housing delivery rates across the town rising sharply.

Figure 2.2 within the London Plan explains the OAPF process grouping the opportunity areas into different categories according to their stage of delivery. It is not clear from the policy or supporting text whether all of the opportunity areas,

or those with the same status, progressing at once would generate unsustainable competition for limited resources. As such, we believe the policy could be strengthened to provide a greater understanding of which bits of London come first. Furthermore, there is no detail on delivery phasing or how the GLA will actually support Redbridge in realising its full growth potential. This level of information would be welcomed by the Council.

The Council fully supports the Mayor's agencies adopting a combined approach to support delivery of the overall vision for Ilford in particular, and help unlocking funding routes to removing barriers to growth and releasing land for redevelopment (e.g. the remodelling of key pieces of infrastructure such as the Ilford gyratory).

However, in relation to criteria A (4) it is not clear how the Mayor will ensure that this partnership approach to promoting the Opportunity Areas will actually work in practice? This is particularly relevant to the Ilford Station Entrance and the issues the Council has had in trying to deliver it. Most critical is aligning funding streams to avoid the need for multiple funding bids that may or may not prove successful. The Council is keen to work with the Mayor and the wider GLA family to ensure necessary joint working is in place to unlock such infrastructure projects required to support growth.

In conjunction with the above, policy SD1 needs to be more specific as to which growth areas come first and how they will be supported and what those areas not in the first phase should do as they await support. It would be helpful for the Mayor to be more explicit that priority is given to acknowledged opportunity areas. Outer London boroughs such as Redbridge need proportionately more support as we do not have the advantage of inner London land values. The lower values represent a direct challenge for the Council to meet the six good growth principles which underpin the London Plan.

Section B, criteria 10 of the policy states that boroughs should work with the Mayor and other stakeholders to identify new opportunity areas. However there isn't anything in the policy which allows for the development of area planning frameworks for existing opportunity areas. Given that the Council has already made considerable progress in delivering the Ilford Opportunity Area through the Ilford Manifesto, the Delivery Prospectus, accelerated housing as part of the Housing Zone and getting an up to date planning framework in place, we are keen to explore the potential for closer joint working with the GLA and other stakeholders in preparing an Opportunity Area Planning Framework (OAPF) for Ilford, recognising the wider regeneration work that is underway.

An Ilford OAPF would enable the Council and the GLA, in partnership with the private sector, to deliver change, attract investment and provide certainty to key stakeholders and delivery agencies. Through the implementation of the London Plan, the Council would welcome an opportunity for further dialogue with the GLA

on this matter.

Further, section B (7) states that boroughs, when making decisions and plan production, should '*include ambitious transport mode share targets*'. Are these the same ambitious targets as the Plan's overarching one of 80% of trips to be made by walking, cycling and public transport by 2040?

London's Green Belt

The draft London Plan supports the continued protection of the Green Belt from inappropriate development. It aims to accommodate all of London's growth within the capital's boundaries and without 'intruding on its Green Belt'. Policy G2 London's Green Belt supports the continued protection of the Green Belt from inappropriate development, although it supports the enhancement of green spaces to provide multi-functional uses where appropriate. It also does not support the de-designation of Green Belt.

As drafted, policy G2 does not refer to NPPF policy regarding development in the Green Belt. Instead the policy includes more simplified wording that seems to offer less scope than at present to consider individual proposals, or 'very special circumstances'. Until the NPPF is amended, the Council considers that the Mayor's 'absolutely no de-designation' stance is contrary to national policy.

Linked to the continued protection of the green belt is the impact of intensification on existing character of areas and the borough's established residential neighbourhoods. This is valued and important and further densification of the borough's town centres will continue to be a key concern for local communities, something which has been played out extensively during the Redbridge Local Plan hearings. Therefore we believe that not considering the green belt as a means of meeting some of London's unmet need potentially undermines the GLA's overall growth strategy.

As the GLA will be aware, the Council considered it had "exceptional circumstances" to release green belt to meet its housing need. This was demonstrated during the recent examination of the Local Plan.

To support this case, we carried out a series of Green Belt assessments which considered all the Green Belt in the borough against the 5 purposes identified in the NPPF. Various conclusions were made around altering the boundary of the green belt in the borough including a recommendation to release a number of sites because they no longer meet some or all of green belt purposes set out in the NPPF. This approach was endorsed by the Local Plan Inspector, which was made clear in his report, "*...that just because a site contributes in some way to Green Belt purposes does not mean it cannot be released. There are other factors that need to be put into the equation*". These other factors include closing the gap between need and supply and the need to find land for infrastructure.

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 Inspector considered whether these existed for Redbridge by looking at a number of factors including:

- The ability to meet the relevant housing requirement set out in the London Plan - As part of the evidence base, the Council carried out a substantial review of the indicative development capacity of the plan's opportunity sites. This took on board the latest planning application information, recent discussions with landowners and developers and the constraints affecting some sites, and application of the London Plan density matrix. This resulted in capacity for new housing from 'brownfield' sources over the plan period to be 15,937, approximately 900 units below the London Plan minimum housing target. Therefore it was quite clear that without Green Belt sites the London Plan minimum housing target would not be met. This would be contrary to the aims of the NPPF as well as result in non-general conformity with the London Plan.

On this issue the Inspector concluded that "*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*". He goes on to say that the work undertaken to establish housing capacity on brownfield sites was thorough and that further intensification could have a significant impact on transport junctions and links and the character and townscape of the borough.

In addition, the Inspector fully recognised that there are of other ways of increasing brownfield housing capacity, as set out in policy 3.3E of The London Plan. However, by means of the Employment Land Review the Council did assess the scope for the managed release of employment land, some of which are included as Opportunity Sites often as part of mixed use developments. Small sites have also 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.

- The Council's poor recent record of housing delivery - 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. Given that the housing need identified by the SHMA and the housing required by the Local Plan only equates to around 50% of the overall need, the gap between

need and supply is a substantial one. Therefore without green belt allocations this position would be even worse.

- The need to meet the infrastructure needs of the borough - The Council's Infrastructure Delivery Plan identified the need for additional primary and secondary schools as well as new health facilities over the plan period. The strategic sites within the green belt offered the capacity to absorb some of this need. As such the Council allocated them for mixed use development including education and health/community uses. Concept masterplans show that this is feasible. 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. Therefore the Inspector accorded this matter to be of significant weight.

Given the above factors and the evidence put forward by the Council to support its strategy, the Inspector concluded that there are exceptional circumstances to warrant altering the Green Belt boundary in the borough to meet housing and infrastructure needs, specifically at Billet Road and the 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.

The Council clearly followed the approach set out in the NPPF and current London Plan in terms of assessing green belt. An approach fully endorsed by the Inspector.

As such, until the NPPF is changed, then draft policy G2 must replicate the essence of national policy in relation to green belt. If boroughs can demonstrate exceptional circumstances and have a robust green belt assessment in place which shows some parcels no longer meet the five purposes set out in the NPPF, then a sound approach has been taken. The Council concludes that the approach to Green Belt in policy G2 is, in effect, accepted as being at odds with national policy. We therefore suggest that "exceptional circumstances" is reinstated in policy.

Wider collaboration with the south east

Policy SD3 recognises the growth locations in the wider south east and beyond and states that the London Plan aims to accommodate all of London's growth within its boundaries without intruding into the Green Belt or other protected open spaces. The SHMA identifies a need for 66,000 homes a year whilst the SHLAA identifies capacity for around 65,000 additional homes a year. Acknowledging the shortfall in capacity, the Mayor will need to work with partners beyond London to

explore if there is potential to accommodate more growth in sustainable locations outside the capital.

The Council is of the view that if the Mayor was to consider a review of green belt to ascertain whether some parcels of land within London no longer meet the NPPF purposes of green belt then some of this shortfall could be met within London's boundaries. Authorities outside of London are already releasing green belt to meet their unmet need. By asking them to meet London's need without having fully considered all alternatives including a review of green belt potentially undermines the GLA's strategy and their ability to meet in full duty to cooperate requirements.

There are existing previously developed sites within the Green Belt that could potentially be identified to meet capacity across London. As such there needs to be greater flexibility to adopt tailored approaches where locations are of poor quality, have low environmental importance and are not accessible for leisure use and no longer serve the purposes of Green Belt.

This is particularly relevant to two specific sites in our Local Plan. Through the green belt review and the housing capacity work we were able to demonstrate 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.

Housing

We welcome the Plan's aspiration to achieve a level of housing supply that broadly meets London's needs. The level of housing need in the borough is high, both as illustrated in the London Plan SHMA and in local data in terms of homelessness and the housing register.

Policy H1 sets a very challenging housing target for Redbridge. Over the next ten years, Redbridge will be required to provide a minimum 19,790 homes. This is a significant increase of 76% on the current minimum target of 11,230 homes (ten year period). In contrast, our emerging Local Plan proposes a capacity of 17,237 homes over 15 years or 1,149 pa. Outer London is supporting a proportionately greater share of development proposed in the London Plan.

The Council generally supports the methodology and process undertaken to develop the 'large site' (10,380 homes) element of the proposed housing target having worked closely with the GLA on the SHLAA process. It is the small sites target set out in policy H2 which raises more significant concerns.

Redbridge has been set a new ten year small sites target to provide a minimum

9,380 (938 p.a) new homes. This is just under the borough's existing minimum housing target for all sites (1,123pa) which is a considerable challenge in the borough's suburban context as well as the fact that we have struggled to meet our minimum target in recent years.

In addition, the plan's proposal to increase housing density of existing residential homes within PTALs 3-6 or within 800m of a tube station, rail station or town centre boundary is of significant concern to the Council.

Small sites are defined as development providing 1 – 25 new homes. This definition is contrary to the NPPF development thresholds. Within the context of Redbridge a development of 10 or more units would be considered 'major' development. The Council considers that the Mayor's definition of a 'small site' should accord with the NPPF and be redefined as development of 9 or less units. The implications of the Mayor's small sites policy will be significant. Indeed, approximately 82% of all new homes are delivered on sites which are between 1 – 25 units.

Small sites methodology

The Mayor proposes that 9,380 homes are delivered on such sites. Essentially this means that approximately 47% of all new homes in the borough will be delivered on 'small sites'. This is in contrast to the 7% of all new homes in the emerging Local Plan, this is partly because of how we define major sites as set out above.

We are disappointed that we were not consulted on the small sites element of the methodology. Consultation would have enabled a more collaborative approach and the ability to ensure general consensus on the borough's small site target. The Council considers the lack of co-operation on this matter is a flaw in the development of the SHLAA.

A number of concerns with regards to the methodology used to calculate the 'small sites' element of the borough's housing target are set out below:

- In estimating housing capacity on small sites the GLA considered two approaches. Approach A follows a traditional windfall approach using past housing completions. Under Approach A, the Council's total 10 year windfall figure is 2,060 new homes. The Council generally supports this figure which broadly accords with the Council's assessment established through the emerging Local Plan. The Council has assumed that allowance for 'small sites' (windfall) should be 2,700 (270 per year) homes over a ten year period. The Council would support the Council's small site housing target being calculated using Approach A.

- However, Approach B has been used to calculate the Council's small site contribution. Approach B makes use of modelling carried out by the GLA to estimate the potential for increased housing delivery within existing residential areas as a result of policy changes in the new London Plan. Under this methodology the Council's housing small sites target would be 9,380 new homes.

The modelling behind Approach B assumes that 1% of the existing stock of houses in areas with a PTAL of 3-6 or within 800m of a station will be 'densified' each year. Again, the methodology does not set out the justification for this figure. The Council is keen to work with the Mayor to fully understand the assumptions used and whether other ones were tested.

The methodology sets out that the growth assumptions in the model are applied to houses as recorded in the 2011 census. It is the Council's view that the borough's housing stock has changed significantly since 2011 and therefore this data is not reflective of the borough's housing stock today and therefore dated. In particular, due to the changes by central Government in 2010 to give permitted development rights for a change of use from C3 - Housing to C4 - House in Multiple Occupation, the borough has seen a significant rise in the number of such units in the intervening years. This will not be reflected in the 2011 Census data.

The Council suggests that the use of Local Land and Property Gazetteer (LLPG) data would provide a more up-to-date reflection of the borough's existing housing stock. A LLPG is an address database maintained by local authorities, who are responsible for creating all addresses. This data set is updated regularly by Council and therefore can provide a more up-to-date picture of the borough's housing stock. The Council has undertaken its own modelling using LLPG data in relation to the small sites methodology approach B. Discounting properties which have been converted into HMOs results in a significant reduction in the overall small sites target.

Finally, in accordance with the GLA's methodology, net additional growth assumption of 2.2 is applied to semi and detached houses and 1.3 for terraced houses. This is based on London-wide trends in development on small sites between financial years 2008/9 and 2015/16. Applying this London average inflates the Redbridge small sites contribution.

Based on the above assessment, the Council considers that past borough trends should be used to calculate borough targets. The data is readily available to the Mayor and application of such data would ensure the methodology is more locally specific.

The Council's overriding concern is that the number of homes proposed is undeliverable. For example, over the last five years, the Council has delivered

2,234 homes of the minimum 4,526, which is approximately half of the cumulative target for that period. In the last five years, 2016/17 was the best performing year but only 818 new homes (from all sites) were delivered, which is less than half of the 1,979 homes required by the London Plan and less than just the small sites target. While the Council is proactively seeking to increase housing supply in the borough and seeking to optimise all opportunities to encourage more housing development, the levels of housing delivery required by the Mayor are significantly higher than the Council has ever achieved.

Linked to this is maintaining delivery of small sites which will be extremely challenging. The risks of downturn, skills shortage and the challenge of affordable housing on small sites will all need to be considered.

In light of the above, we would welcome a further opportunity to engage with the GLA on this matter prior to examination.

Infrastructure

The Council is concerned that the cumulative impact of small sites intensification in town centres and other locations will have a significant impact on local infrastructure provision such as access to GPs, schools, leisure and recreational facilities and local transport.

It will be crucial that this increase of overall housing supply is supported by the right infrastructure in the right place at the right time. If the need for such infrastructure isn't already identified by the Council, through the Community Infrastructure Levy Regulation 123 List, and funded through planning agreements, the provision will lag considerably behind the pace of development. This is because the Council will need to aggregate contributions from a series of developments over time in order to secure the significant pots of funds necessary to provide new facilities.

Given the significant emphasis on the contribution of small sites to housing delivery, in a borough like Redbridge, many of these small developments are expected to be of 10 units or less. The Council is unable to seek S106 contributions for affordable housing or to pooled funding 'pots' intended to fund the provision of general infrastructure in the wider area from such schemes. This will impact on our ability to mitigate for the environmental impacts of the proposed scale of housing and population growth. In turn, this will adversely impact on the general health and wellbeing of the community and will inhibit and work against the achievement of the Plan's policies on 'Good Growth'.

To support the development of our Local Plan, 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 allowed us to identify the infrastructure needed to deliver planned growth sustainably, effectively and at the

right time.

The Council is confident that sufficient capacity exists or is planned to provide the necessary additional primary and secondary school places. Coupled with the on-going work with free- school providers there will be sufficient school places for Phase 1 of the Local Plan. 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.

However, the proposals for increased housing from small sites will present particular difficulties with pupil place planning and educational provision. Much of the demand for pupil places in recent years has been met through expansions of existing schools on their existing sites. This option is virtually exhausted. Apart from the capacity which has already been identified through the Local Plan process, an additional number of smaller size developments is increasingly likely to result in pupils either having to travel longer distances to access a school place or schools having to admit over 30 pupils per class where legislation and accommodation allows.

To ensure we retain childcare sufficiency levels, we support policy proposals that encourage co-location of uses that would enable either co-located early years settings on ground floors in conjunction with libraries and other community spaces or the provision of specialist accommodation for early years settings on the ground floor of a number of the proposed housing developments.

Design and character

Of most concern is the potential impact that this increase in small site delivery will have on the on the character of the borough. The built up area of the borough is predominantly of a low density suburban residential character. The Characterisation Study (2014) shows that that approximately 80% of built up areas are residential. Furthermore, 71% forms suburban development, suburban terracing and urban terracing which are generally lower density housing and two to three storeys in height. Given this and the impact increased density development will have on such areas it is the Council's view that the Mayor's approach does not, "respond to local character and history, and reflect the identity of local surroundings and materials" and will not secure good design quality in accordance with NPPF paragraph 58.

Whilst the draft London Plan contains a number of policies which aim to make the most efficient use of land, the criteria set out in Policy D2 for a presumption in favour are too broad and will have the potential to adversely impact on the character and environmental quality of very suburban, low density, locations which happen to be within 800m of a tube or rail station and where higher density development would be inappropriate.

In addition to this, whilst the strong emphasis on high quality design is welcomed

and supported, there is some concern over how Design Codes will work in practice; in particular the resource implications of properly managing Policy H2 through the use of 'area wide design codes' and the timing of the implementation of the policy. The Council considers that early conversations and engagement with the GLA will be crucial to fully understand what will be acceptable in terms of design and how we accommodate growth.

As part of developing its own Local Plan, the Council considered a range of 'reasonable alternatives' within the Sustainability Appraisal (SA) (2017). The SA assessed a range of options to increase the level of housing in the borough. This included greater densification of the urban area as is proposed by the draft London Plan. The SA found that this option would be beneficial in terms of impact on biodiversity, traffic environment and providing a reliable transport network, however it would provide the least number of new homes, be less sustainable in terms of addressing poverty, promoting economic growth, providing community services and have a significant negative effect on education provision. Overall, the SA found that greater intensification of the borough's urban area, beyond what is proposed in the Council Local Plan would be unsustainable and therefore not pursued as a development option for the borough. Instead the Local Plan provides a balanced approach to managing growth with managed green belt release and intensification in appropriate locations given the borough's context, constraints and opportunities.

Funding the London Plan

It is clear that the draft Plan is ambitious and requires a significant level of funding and investment. As such it will be important that the Mayor continues to lobby government to secure the funding to meet the large anticipated shortfall.

Whilst we appreciate the need to deliver higher housing targets, more certainty is needed that the current mechanisms for securing funding towards social infrastructure is sufficient to meet the needs of a rising population. Whilst the Mayor is explicit that everyone has a part to play in implementing the London Plan, it would be beneficial for the London Plan to provide more guidance on how the GLA is planning to work with boroughs and other key stakeholders to ensure that an adequate level of social infrastructure is funded and provided alongside housing growth. Redbridge is very keen to work with the GLA on this from an early stage ensuring the right mechanisms are in place to secure sustainable development for our residents.

Policy DF1 pushes back against viability objections to planning gain, and notes the community infrastructure levy which is welcome. The accompanying text sets out in detail the funding gap for London, the Mayor's desire for devolution of fiscal powers, and the alternatives to greater public sector funding, namely land value capture, private sector investment, and variously reducing demand.

While the plan supports borough involvement in the direct delivery of housing, it does not make a London specific case for the devolution of national policy and funding to support local authorities to build more housing. Joint GLA/borough lobbying around flexibilities on right to buy receipts and Housing Revenue Account (HRA) borrowing would be powerful in enabling boroughs to become key providers of affordable housing in the city.

The London Plan process

The Council notes the proposed timetable in place between now and formal publication of the London Plan in 2019. Whilst it recognises there is only one formal stage of consultation prior to examination taking place, the Council is concerned that there isn't a further opportunity to discuss in detail our comments and concerns prior to formal examination. The timescales set by the Mayor don't allow for these discussions to take place with the boroughs. In particular, the Council would welcome the opportunity to engage with the GLA on the small sites methodology for the reasons set out above.

The GLA have signalled that some 'early suggested changes' are likely to be proposed to the Inspector, but these will only be for comment and not consultation. This means it is very limited as to how far the actual policies can change.

It is standard practice in plan-making, and in particular as the Plan is reaching examination stage, for parties to engage in discussions with a view to reaching some common ground on policy matters before progressing to examination. Doing this would reduce the number of objections that would need to be discussed during the examination hearings.

With the significant step change being proposed in the London Plan, and in particular the changing emphasis on the suburban pattern in Outer London, and in the interest of on-going dialogue, the Council is disappointed that the Mayor has not allowed more time for boroughs to engage in a more collaborative way.

2. Detailed comments on London Plan policies

Good Growth

Policy GG1 is welcomed but to be fully inclusive criteria (f) needs to include gypsies and travellers. The policy should also be strengthened to prioritise affordable housing delivery. For Redbridge building strong and inclusive communities means the delivery of essential affordable housing.

Policy GG3 is welcomed, the principles of which are broadly reflected in the Council's Local Plan and health strategies. However, there needs to be a recognition that the GLA and relevant partners will need to work harder to get certain groups to feel the benefit – targeted effort is needed to get the fairness and equality we are striving for.

Overall we support the Plan's aspiration to deliver new homes and the principles of GG4. However it is also important that this overarching policy recognises the need for infrastructure, social and physical, to be provided alongside housing growth to meet the needs of a growing population. It is essential that the London Plan puts in place the mechanisms to ensure that adequate social infrastructure is provided alongside housing. We would also like to see more guidance from the GLA on how criteria E on incentivising build out milestones would work.

We support Policy GG5, however more emphasis should be given to promoting the right types of employment sectors in outer London.

The Plan contains very ambitious targets in terms of London becoming more efficient and resilient. The principles of policy GG6 are supported.

Spatial development patterns

SD6 Town centres

We strongly support policy SD6. Digital infrastructure should be included in the policy recognising the importance of such infrastructure in attracting investment to town centres. We would also like to see more of an emphasis on the need for mixed use town centres including affordable workspace.

SD7 Town centre network

The town centre hierarchy set out in policy SD7 is supported and reflects what's identified in our Local Plan. Ilford remains a metropolitan town centre, has medium commercial growth potential (moderate levels of demand for retail, leisure, office or leisure office floorspace), high residential growth potential, is within a strategic area for regeneration, has a regional or sub-regional significance night time economy classification. Through wider visioning work, the

Council is committed to enhancing Ilford's profile and performance to ensure it becomes a London town again. The arrival of Crossrail is the major catalyst for investment and change. We would like to see the Council's vision for Ilford Metropolitan Town Centre reinforced in the new London Plan.

SD8 Town centres: development principles and Development Plan Documents

The Council strongly supports this policy and the "town centres first" approach, and in particular is actively pursuing the designation of land within criteria B 5) for residential led mixed use developments. The Council would support active collaboration between the GLA and major retail and leisure operators / landowners to encourage and facilitate the residential-led redevelopment of low density supermarkets, car parks, and leisure / retail parks, whilst retaining and providing for identified needs in commercial floorspace.

Section 4 of the policy needs to include a criterion on the availability of social infrastructure to support intensification in town centres. This is essential if sustainable neighbourhoods are to be secured for our residents. It's an existing concern only to be heightened if the borough's town centres are expected to deliver the growth targets identified in this plan.

However, the policy is silent on waste collection servicing and how this would work given the proposals to intensify town centres and the contribution small sites will play in increasing housing delivery. As the majority of the Plan's proposed growth will be located within town centres, the policy needs to address essential issues such as waste collection and broader site servicing.

SD9 Town centres: local partnerships and implementation

The Council strongly supports Policy SD9 and the statement that each town centre needs a 'Town Centre Strategy produced in partnership at the local level in a way that is inclusive and representative of the local community'. The policy however needs to go further and set out how these strategies will be financed. Although the policy states all town centres, the Council is keen to explore in more detail how feasible it would be to look at some of the borough's district centres, in particular those that may not be performing as well as they should. The Council welcomes further guidance on how these strategies will be produced.

We also welcome the statement that boroughs should consider Article 4 Directions to remove permitted development rights for office, light industrial and retail to residential in order to sustain town centre vitality and viability. Whilst we support this intention, it could be interpreted as a policy conflict or tension particularly if boroughs need to be exploring opportunities to intensify residential development.

SD10 Strategic and local regeneration

We support the policy intent of SD10. Although Ilford's growth potential is recognised through its Opportunity Area status, the London Plan could be more supportive of the ambitions set out in the Ilford Prospectus. As set out earlier, we are happy to work more closely with the GLA on how this can be achieved, recognising the regeneration activity that is currently underway in Ilford.

The policy refers to the importance of development plans and opportunity area planning frameworks in taking an integrated spatial approach to wide a range of issues which exist within strategic and local areas for regeneration. Whilst we support this intention we consider this reinforces the need for an OAPF to come forward for Ilford to enable the Council to deliver change, attract investment and provide certainty to stakeholders and delivery agencies.

Design

D2 Delivering good design

Providing a presumption in favour of certain types of small sites development as sites come forward is in principle a workable approach, but some of what is proposed in H2, such as proposals to increase residential density through '...infill development within the curtilage of a house..' is highly questionable considering the national drive to stamp out overcrowding and unlawful back-land development.

The Mayor's draft Environment Strategy assigns an important role to private garden space to protect London's wildlife and help achieve the Mayor's target of a 50% green London. The Environment Strategy states that the Mayor will '...provide advice to householders about how gardens contribute to improving green infrastructure at a local level...' (proposal 5.1.1b) to encourage them not to develop their private garden space. Based on this, we consider criteria 2d) in policy H2 appears to take a directly opposite approach, again having an impact on the ability to deliver on the Plan's good growth principles.

D3 Inclusive design

The Council welcomes section A which seeks development that attains the highest standard of accessibility ensuring independent access and dignified emergency evacuation for all users. In addition, we strongly support the policy requiring the provision of a fire evacuation lift suitable to evacuate people who require level access. The policy could be strengthened by requiring details of engagement with stakeholders (including disability organisations) on large developments. The Council is also pleased to see that the Mayor will assist boroughs in implementing inclusive design measures.

D4 Housing quality and standards

Policy D4 is welcomed as it provides the strategic approach to ensuring housing quality and standards are met. The policy is not prescriptive in relation to external space and merely stipulates basic standards. The Council's Local Plan provides the detail for amenity space, and together with policy D4, both provide sufficient steer to encourage a range of housing typologies to be built. The Council welcomes reference to the Mayor producing guidance on the implementation of this policy for all housing tenures.

D5 Accessible housing

The Council strongly supports provision of suitable housing for Redbridge residents including wheelchair users and ensuring independent living and compliance with the Building Regulation. The Council suggests combining policies D5 and D6 to become a single policy on inclusive design and accessible housing.

D6 Optimising housing density

Policy D6 requires development proposals to maximise the most efficient use of land; and that residential development that does not demonstrably optimise density should be refused. This approach is generally supported. However whilst the policy provides a number of qualifiable considerations of density, there is very little guidance to clarify the types of development which would/would not 'optimise density' or to assist boroughs in justifying the refusal of schemes which are considered not to represent the efficient use of land.

Without such guidance the policy would have very limited benefit to boroughs in promoting higher density solutions and/or resisting proposals. Inclusion of a density matrix as a quantifiable benchmark of density, as is the case in earlier versions of the London Plan would be helpful in this regard. Given that such a density matrix is already included in the draft London SHLAA Methodology (2017) it would be beneficial if this matrix were to be included as an additional consideration of part A of this policy.

This approach would when considered alongside the other Design policies provide a more successful balance of qualifiable and quantifiable elements to consider future proposals and planning applications for residential development.

D8 Tall buildings

The overall policy approach of the policy essentially reflects considerations already highlighted in the Council's Local Plan tall buildings policy (LP27). However, policy LP27 does not contain indicative building heights for tall buildings to guide developers, as advocated in section B of the London Plan. The

Council believes that each application should be considered in the context of the surrounding area on a case-by-case basis. By including this criteria in the London Plan, the Council considers this reduces its own grounds for discussion and negotiation with developers.

To support the Local Plan, the Council carried out a robust up-to-date tall buildings assessment (2017) which provides a guide for developers on issues such as key views and areas appropriate for tall buildings. It includes sufficient detail for applicants to understand the scale of development in different locations that may be acceptable in principle, forgoing the need to state what scale and heights might be appropriate in specific locations within policy. We consider this to be a better approach than that outlined in Policy D8, which states that the development plan should ‘...indicate the general building heights that would be appropriate’.

A further concern is the sentence at criteria B2) ‘...their potential contribution to new homes, economic growth and regeneration’. The economic/regeneration benefits of a tall building should be considered separately to delivery of new homes, rather than the balanced approach suggested in the policy. It would be helpful to split this section, to give boroughs greater opportunity to seek more commitment to regeneration outcomes.

Housing

H4 Meanwhile use

We support the proposals on meanwhile use in policy H4 which will enable the authority to develop options such as modular housing as temporary accommodation, meeting a need for good quality local accommodation to respond to levels of homelessness in the area and prevent the need to use so much accommodation out of borough. Two sites are already proceeding in the borough and we support a proposal that makes these schemes work well.

H5 Delivering affordable housing & H7 Affordable housing tenure

The Council supports the drive to increase the supply of housing and would support the ambition to deliver the target of 50% of all new homes to be affordable, while recognising that this is subject to viability. We also support the provision of a range of different affordable housing products including low-cost rented, the London Living Rent and shared ownership to meet the needs and aspirations of households on low and medium incomes. The Council is keen to explore this issue with the GLA and housing partners to ensure these products respond to needs at a local level.

Redbridge has 5,271 households on the housing register and 4,468 of whom have a level of housing need sufficient to meet the high thresholds in the Housing Allocations policy for an award of priority. The remaining group are households wanting to move into sheltered housing (approximately 160 households) and Redbridge council tenants seeking transfer with no recognised housing need. The highest priority group on the register are homeless households with over 2,500 households registered as homeless home seekers. 1,500 households have been awarded priority because their current home is overcrowded; of which 158 were Redbridge council tenants who have outgrown their existing accommodation. There are currently 2,269 households in temporary accommodation, over 1,000 of whom are placed outside of the borough because the lack of supply in Redbridge. Rehousing times from the housing register are long, with households requiring 3 bedroom accommodation for example waiting on average over 13 years.

Given this level of need we welcome targets to deliver new homes in the borough and any mechanisms to make this easier. However what is clear is that the need for housing in the borough is concentrated in the group that need affordable accommodation and in family sizes. In particular, three bedroom accommodation where levels of need are acute and the ability to secure supply to meet that need is constrained, both in terms of the small supply of affordable homes becoming available and the limited availability of homes of that size available in the private market at or close to local housing allowance rates. The focus in the supply targets on the contribution from small sites give rise to a concern that these will not deliver the scale of affordable housing that is needed or the bed sizes which would most alleviate our acute levels of need for family sized accommodation. Given the scale of affordable need we would welcome any strengthening in the ability to secure higher proportions of affordable homes on private developer schemes than is often possible at the moment.

H10 Redevelopment of existing housing and estate regeneration

Estate regeneration in Redbridge presents an opportunity in to provide more affordable housing, but the plans in the Mayors Housing Strategy to require the ballot tenants may make the delivery of effective estate regeneration impossible to achieve, even where it is delivering increased affordable supply and improvements for existing residents. Where there is redevelopment on an existing estate, we are committed to engagement with existing communities as it is fundamental to ensure cohesive development takes place and demonstrates best practise.

The Council has carried out a review of its housing portfolio to identify potential opportunities for additional affordable housing delivery. Such opportunities include intensification of existing sites by building additional homes on underutilised areas, through infilling or additional floors on existing buildings and comprehensive redevelopment of estates to maximise affordable housing

delivery. This also includes the Housing Capital Programme for HRA Stock geared towards refurbishment over next 5 years as opposed to regeneration.

H11 Ensuring the best use of stock

We broadly support policy H11. Redbridge has no significant issues currently within its council housing stock in terms of long term voids and is proactive in trying to bring empty homes back into use. A reliance on measures such as Empty Dwelling Management Orders as an effective method to produce any significant impact on empty properties however does not recognise the reality that they are only a suitable option in a very small number of cases and are often not financially viable options for the authority.

H12 Housing size mix

Policy H12 and corresponding Table 4.3 shows the SHMA findings and the need for more 1 and 2 bed units. Local assessments of bed size need have to be the pre-eminent factor in affordable schemes and provide the most appropriate measure of the stock that the borough needs to see developed. We support a range of tenure mixes and mixed use schemes, which would respond to the range of different housing needs in the borough. Locally there is a strongly evidenced need for homes of 3 bedrooms or more (3 in particular). An over-supply of one bed units would not be the most effective way to respond to need locally for affordable housing.

H14 Supported and specialised accommodation

In relation to supported and specialised accommodation in policy H14, the Council is particularly concerned around the issue of priority housing prioritisation for our care leavers under our corporate parenting responsibilities. The shortage of housing is a key concern for young people moving through transition from being looked after to becoming a care leaver. The lack of available housing and cost of renting PR properties is a significant drain on our budgets so rents that are affordable within housing benefit limits and for young people on low wages needs to be a key consideration.

H15 Specialist older persons housing

We welcome the Mayor's proposals around specialist older person housing set out in policy H15 and the Council has recently undertaken the conversion of an office within one of our two sheltered units into a new residential unit. The indicative benchmark to provide 155 units per year is achievable.

H16 Gypsy and Traveller accommodation

The Council notes the Mayor's new definition for Gypsies and Travellers in policy H16. Whilst this new definition goes further than the government's definition in relation to not recognising many Gypsies and Travellers, it will be important that government endorse this definition. This change in policy has the potential to cause soundness issues for boroughs when developing their plans and being in conformity with the London Plan on the definition but not in line with government guidance.

The policy provides a transitional type arrangement for how boroughs should now properly assess the needs for Gypsies and Travellers and undertake a needs assessment. The Redbridge Local Plan is supported by an up-to-date Gypsies and Travellers Needs Assessment (2016) that overall illustrated a slight increase in the number of pitches required over the next 15 years. It concluded that the identified need could be met on the existing site in the borough. CLG needs to endorse this definition.

The policy needs to go further and reflect that typically most gypsy and traveller sites are quite often in outer London and on the green belt. As such "exceptional circumstances" will need to exist for land to be released from the green belt in order to meet the need for Gypsies and Travellers. Some flexibility within the policy in relation to green belt is required. Fixed wording that alteration to the green belt as set out in policy G2 isn't supported and as a result will impact on the ability for outer London boroughs to find additional sites to meet the needs for Gypsies and Travellers.

Further to the issue about need and capacity, one of the really difficult issues is around inclusion. Local experience as well as expressed views suggests that various groups generically identified as travellers (i.e. English gypsies, Irish travellers and Roma gypsies) experience tensions when on the same sites. This suggests a difficulty in achieving a "wider inclusive neighbourhood" and more research around this is welcomed.

H18 Large-scale purpose-built shared living

This policy is supported and we welcome the acknowledgement that this type of accommodation is seen as providing an alternative to traditional flat shares. The Council strongly suggests clause A (4) on tenancies is amended to "no less than six months" to ensure that this form of accommodation is meeting its specific housing need and that it does not effectively become a hostel.

Economy

Policy E1 Offices

We support this policy. However, we have concerns about E1(b) where evidence of demand is referenced. Part of regeneration is to reverse current trends and 'create demand'.

The Council also recognises that office to residential conversions should be managed, and that the use of PD rights can effectively neuter the opportunity for a more comprehensive redevelopment that can yield more, higher quality housing.

Policy E2 Low-cost business space

The Council strongly supports this policy. Redbridge is a borough of start-ups and micro-businesses, and providing suitable space for businesses to grow is important, especially where those businesses cater to the specific needs of diverse local communities.

Policy E3 Affordable workspace

The Council strongly supports this policy. Affordable workspace can provide opportunities for new business clusters to emerge, as well as opportunities for collaboration and agglomeration in fields such as the creative sector. Affordable workspace is being actively supported by the Council with the provision of permanent and meantime uses as affordable workspace.

Policy E5 Strategic Industrial Locations (SIL)

The Council supports this policy and is keen to ensure a diverse local economy, focusing on improving existing employment land to attract new investment. Therefore, increasing the capacity, quality, and density of the borough's Strategic Industrial Locations (SILs) is a key objective of the Redbridge Local Plan; the essence of which is replicated in policy E5.

Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function

The Council is concerned about the implications of this policy in regards to the design and amenity implications for residential development, in addition to its accessibility to nearby neighbourhood facilities, given the nature of SIL within Redbridge. It would prefer to match the release of smaller industrial sites for housing with a corresponding intensification of its preferred SIL.

Policy E8 Sector growth opportunities and clusters

The Council supports this policy and welcomes the recognition of the Thames Estuary Production Corridor. We will seek to actively benefit from it, with its proximity to the East London creative industry and Barking and Dagenham film studios.

Policy E9 Retail, markets and hot food takeaways

The Council supports this policy and welcomes the policy wording in parts C and D on hot food takeaways, which is similar to its policy around managing takeaways in close proximity to schools.

The Council also supports part B 8) of the policy, and has allocated several edge of centre and out of centre retail / leisure “sheds” and associated parking for residential led mixed use development in its own Local Plan; and would welcome additional working between the GLA and major retail and leisure operators in this regard.

Policy E10 Visitor Infrastructure

The Council supports this policy and seeks to create a visitor economy, particularly in Ilford with access to the Elizabeth Line.

Heritage and Culture

HC1 Heritage conservation and growth

The Council supports and welcomes this policy overall. The policy reflects a considered and good practice approach to the protection of heritage assets and archaeologically. However the policy does not go far enough in stating explicit consideration of undesignated assets, which make up large areas of important local character.

On a separate issue figure 7.2 shows an earlier boundary of the Woodford Broadway Conservation Area. This has been extended to include the wider residential area of Monkams. The Council can provide updated mapping to assist the GLA on this.

HC5 Supporting London’s culture and creative industries

The Council strongly supports this policy. This is evidenced in the Ilford Delivery Prospects and helps provide some planning weight to the ambitions of the Prospectus. The Council supports the Mayor’s commitment to protecting the arts/culture/creative sectors as key assets, not just in central London locations, but across the capital. As such, reference to designating Creative Enterprise

Zones is welcomed. The cultural diversity of Ilford's community offers an opportunity to create a vibrant and attractive town centre, with clusters of opportunities for high quality leisure and culture uses and a new civic presence. The intention to protect and promote creative workspace is also welcomed.

Policy HC6 Supporting the night-time economy

The Council strongly supports this policy. Applications in Ilford Town centre should state how they are making a positive contribution to the night-time economy.

Policy HC7 Protecting Public Houses

We support this policy, which broadly accords with our on protecting community facilities. Outer London has particular challenges in this respect, partly because of demographic reasons and partially because of the suitability of many pubs as housing sites when the existing use value may be low. It would be useful for the supporting text to provide more guidance on what timescale is meant by "foreseeable future".

Green infrastructure and natural environment

G4 Local green and open space

The Council supports the overall aims of policy G4 but considers that the proposed approach to development set out in the London Plan could increase demand on existing open spaces, both to build on and also in regard to demand. This is especially true as areas of the borough with the highest projected population growth are generally those with the least access to green space. In addition these areas would also see the highest levels of development within the existing and new London Plan.

Creative solutions, in the spirit of the borough's own "Ilford Garden Junction" proposal, for the co-location of green space with other facilities should be supported in areas of deficiency, for example by providing a vegetated cover to open road or railway cuttings, or providing utilities underneath public squares.

Releasing low quality green belt would allow for previously inaccessible land to be made accessible for leisure and recreational uses, and for new housing to be located with good access to that land. For example, land at Five Oaks Lane, Chigwell had a history of unregulated and inappropriate uses in the Green Belt, most of them no longer subject to planning enforcement due to the passage of time. The redevelopment of this site enabled the built area of the site to be consolidated and densified within part of the site, delivering new housing and facilities, with the remainder released as publically accessible open space to provide ecological corridors and serve the new development.

This approach could be applied to other previously developed land in the Green Belt, whereby inaccessible land is made accessible as part of a new development and improved through a master planned approach, thereby contributing towards part B of Policy G1.

SI Protecting London's Waterways

The Council supports this policy as the main River Roding is somewhat under-appreciated, in no small part because of how it relates spatially to the A406 and M11 running alongside or above it. It believes that waterways can be a suitable magnet for investment and development, whilst also offering access to nature. The River Roding runs very close to Ilford town centre but currently has a low profile and is relatively inaccessible. Through the Ilford Delivery Prospectus the Council will encourage new development in certain areas to respond to the river and provide access to it.

Sustainable Infrastructure

SI1 Improving air quality

This policy is welcomed and the Council agrees with and supports the overall objectives and the general approach being taken by the Mayor.

The draft Redbridge Air Quality Action Plan (2017-2023) relies partly on the mayor's plans for the inner London Ultra Low Emissions Zone (ULEZ), which includes the south west area of the borough up to the north circular. The ULEZ has not been mentioned in Policy SI1 although the plans for its roll-out are made clear in the Mayor's draft Environment Strategy. It would be useful if the ULEZ was included in the supporting text of this policy.

SI2 Minimising greenhouse gas emissions

The Council supports the overall objective of zero carbon development in Policy SI2.

In relation to the carbon off-set fund, there is a concern that it could be more of a preferable option for developers when faced with the more expensive costs of meeting over 35% carbon reductions and increased energy efficiencies. The policy could be made clearer on this point.

Part A of Policy SI2 focuses only on major development with regard to zero-carbon requirements, and makes no reference to small sites. This may be an oversight, considering the hugely increased level of housing development planned for small sites in London. As the Council has seen its target increase by 76% from 1,123 to 1,979 homes per year, with small sites contributing 938 homes, this means that close to half of the homes planned will not be required to

meet zero carbon-emissions targets. Has this been factored into the overall objective of making London a zero-carbon city?

If this is not the case, it is suggested that policy SI2 is amended to include all development is required to achieve zero carbon targets. However, the text must also recognise that it may not always be feasible to meet these targets. As such a flexible approach must be applied.

SI Energy infrastructure

The Council supports the overall aims of this policy which is a good basis for the development of more effective and efficient energy sources. In relation to establishing effective energy supply options it is important that the commercial conditions exist for this to happen. The Council has undertaken studies for a Decentralised Energy Master-plan, and whilst there is potential for decentralised energy in key growth areas mainly in the south of the borough], further feasibility work has shown that the economic viability of Decentralised Energy Networks (DEN) is highly dependent on reaching the right commercial agreement with key stakeholders in the area (major developers). Economic performance assessments for potential development schemes found that revenues were insufficient, anticipated heat loads unfavourable, and the overall financial performance insufficient to attract private sector funding.

SI10 Aggregates

The Council supports comments made by the London Aggregate Working Party (LAWP) in relation to policy SI10.

SI18 Waste capacity and net waste self-sufficiency

When taken together, the Council is concerned that the Mayor wants to achieve too much in the Plan. The apportionment targets set out in Table 9.2 have increased for the outer boroughs. Without updating the respective sub-regions waste plans, boroughs will struggle to find capacity considering the huge amount of development planned for, as well as hitting all the targets, particularly for landfill. As the London Plan doesn't actually identify sites for waste facilities just search areas, the Council, as part of its membership of the East London Waste Authority will need to consider in more detail the apportionment targets and explore ways in which capacity can be met. The Council would like to see more up-to-date data on waste arisings, as current data is old and not reliable.

Transport

Policy T1 Strategic approach to transport

The Council supports the strategic approach to transport and the schemes considered included within the policies. However, we reiterate our comments made to the Mayor's Transport, particularly in relation to meeting the challenging strategic target of 80% of all journeys using sustainable travel by 2041. The Council would support a change in approaches to transport modelling to better enable the GLA and TfL to deliver the objectives of the London Plan and MTS.

In relation to policy T1, the Council is disappointed that within the identified schemes in Table 10.1, little consideration to orbital transport links in Outer London has been given, as transport links from the borough into central London are far stronger than those to some adjoining boroughs, or even between the south of the borough and the northern and western areas.

The Council does however note that reference has been given in paragraph 10.3.6 to orbital bus routes. We are keen to work with TfL and operators to improve the frequency, speed, and reliability of these services which are vital in connecting local communities and town centres.

T2 Healthy streets

The Mayor's integrated approach to planning and health through the Healthy Streets initiative is supported. However, the policy needs to be more explicit and recognise the challenges outer London face in meeting the ambitious 80% target to increase levels of walking, cycling and public transport by 2041. This target requires behavioural change from both existing and new residents. The Healthy Streets approach is beneficial and already in use to varying extents by many boroughs. It would be helpful if the policy was more flexible on this approach as not all the indicators are always relevant.

T3 Transport capacity, connectivity and safeguarding

In policy T3 there is no reference to transport schemes in the east London sub-region. Given the level of growth proposed for the sub-region there needs to be more on the outer London proposals, funding and phasing. We are also concerned that whilst orbital links are referenced, there are no real solutions to introduce them, except the West London orbital line. We want to see more orbital links in east London to reflect the planned growth in this region to ensure it is 'good growth' developed to a sustainable masterplan.

Also, given our Local Plan strategic allocations at King George/Goodmayes Hospitals and land at Billet Road (collectively allocated for 1300 homes) the Council would like to see more emphasis on investment in buses –

improvements to existing routes and introduction of new ones, investment in walking and cycling infrastructure linking to Crossrail stations.

Policy T5 Cycling

The Council supports this policy and looks forward to further opportunities to enhance cycling in outer London, such as on the proposed cycle route from Ilford to Dagenham Dock. We also believe that Ilford has greater potential for cycling, however this will require significant funding.

The Council also considers that the approach taken to developer contributions means that the genuine enablement of cycling can significantly increase the quantum of housing that can be delivered in a given area, by reducing the land take of private motor traffic, and reducing the amount of demand on modes that are more capital intensive to provide additional capacity for.

Development proposals should provide improvements to cycling conditions in their immediate vicinity, proportionate to the scale of development and tied in with Policy T4, should be provided. This could comprise alterations to turning restrictions, cycle contra-flows, cycle lanes, or cycle permeability into or through larger developments.

The Council supports references in the supporting text (paragraph 10.5.5) to facilities for disabled cyclists and non-standard cycles. However it needs to be stated within the policy itself that internal cycle parking should be accessible to such vehicles, as many major schemes will include basement cycle parking with constrained routes to enter. Where viable, strategic schemes could include cycle parking accessible via a ramp that avoids the need to dismount and push, which may be difficult for some disabled cyclists.

Policy T6 Parking

The Council understands the need to reduce the reliance on the private car to tackle climate change and deal with the land take of car related infrastructure including parking and highways (which can reduce housing capacity). However it is concerned, especially in the case of Policy T6.1, that inadequate parking will cause overspill with resultant issues, and that insufficient consideration has been given to the specific issues in outer London of the orbital journey which is poorly served by public transport.

The Council supports the provision of car club bays or car sharing arrangements, as it believes it provides flexibility for some of the more poorly served journeys, and believes they should be more proactively required for outer London on major developments.

The Council supports and welcomes the acknowledgement that industrial uses

can have different trip generating characteristics (such as shift work).

T7 Freight and servicing

The Council supports this policy, however (especially for commercial development) it is concerned at how part G may conflict with the London Lorry Control Scheme which explicitly seeks to restrict lorry access and use during the evening and night time (and at weekends). The Council also believes more explicit reference should be given to the role of Network Rail in enabling the use of rail freight.

Policy T9 Funding transport infrastructure through planning

The Council supports this policy, particularly parts B and C, which will be necessary to help deliver the infrastructure needed to enact modal shift in outer London. However the scale of the change to the built environment needed in outer London to enable the ambitious modal shift envisaged to be met will require increased LIP funding as well, with planning gain being focussed in areas of high growth.

Transport infrastructure requires a significant financial commitment. Policy T9 needs to provide a greater level of detail. The policy identifies that Mayoral Community Infrastructure 2 (MCIL2) will be introduced in April 2019 for Crossrail 2, but if no agreement on Crossrail 2 funding is agreed then the funding is to be used for non-specified strategic transport projects. The Mayor needs to be open about what these alternative transport projects would in order to justify the implementation of MCIL2 particularly for Redbridge where we will not see direct benefits of Crossrail 2 or the Bakerloo Line Extension.