

## London Borough of Redbridge Local Plan 2015-2030

### Statement Addressing Issues 5, 6 and 11

Statement submitted by DNS Planning and Design on behalf of the

Guide Dogs for the Blind Association

RE: Opportunity for Alteration to Green Belt boundary

to enable the comprehensive redevelopment of the

London Centre Redbridge Training School Site,

Woodford Bridge, Redbridge



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**May 2017**

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### **Appendix 1: Drawings**

**Figure DNS 01: Character Assessment**

**Figure DNS 01: Illustrative Masterplan**

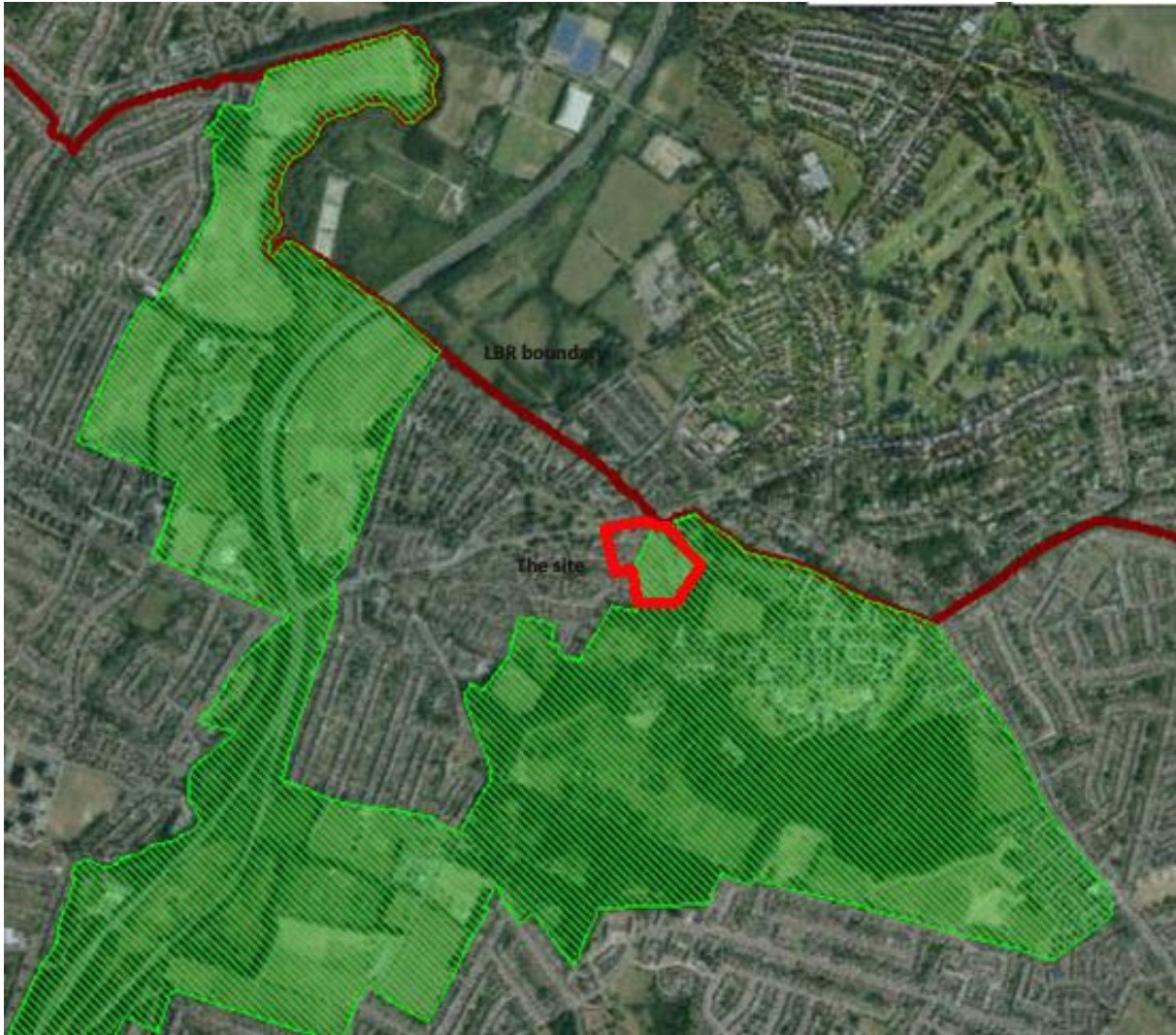
## **1.0 Introduction**

DNS Planning and Design is instructed by the Guide Dogs for the Blind Association (GDBA) to submit statements on Issues 5, 6 and 11 for the the Redbridge Local Plan Examination.

The purpose of these statements is to seek the allocation of the GDBA's London Centre Redbridge Regional Dog Training School site. These statements and previous representations are made against the background of a strategic review of the GDBA's operational activities which has resulted in its decision to close the Training School and to replace it with a network of more local community based dog training facilities and support centres.

The site is situated in the suburban residential area of Woodford Bridge on the south side of Manor Road (B173) in close proximity to the junction with the A113 Chigwell Road. Alongside the site is an area of large detached private houses together with a public house, whilst to the west is an extensive established area of relatively modern housing (refer Figure DNS 01: Character Areas).

The total land comprising the GDBA London Centre is approximately 3.91 ha (9.66 acres) of which 1.1 ha can be regarded as previously developed land within the built up area, whilst the remainder (2.81 ha) is located on the northern edge of the Metropolitan Green Belt. The site currently comprises a complex of relatively modern three and two storey brick built buildings under tiled roofs. These comprise a mix of administrative offices, storage and training rooms, dining room and kitchen, student and staff residential accommodation and laundry (within the built up area). Sited within the adjoining Green Belt land are kennel blocks, maintenance buildings and an isolation block together with external dog runs and exercise areas (refer Figure A1 and Site Photographs below).



Plan A1: Site Location in relation to the Green Belt



Existing kennels in the Green Belt



Urban edge along Manor Road



Woodland edge to the south



Urban edge to the west



Engineered landscape within the Green Belt



Existing admin and accommodation block

The GDBA is seeking a minor amendment to the Green Belt in this location to enable a comprehensive approach to the redevelopment, regeneration and recycling of what is essentially urban land which will become derelict after the facility is closed of this site for residential purposes. Since the previous representations submitted to the pre-submission draft plan, a more detailed master planning exercise has been undertaken showing how the site could be laid out to delivery a policy compliant scheme for 140 dwellings, 40 % green infrastructure and 50% affordable housing (refer Figure DNS 01: Illustrative Masterplan).

If the Inspector agrees to propose this amendment, then the GDBA can confirm that the site will be made available within the first five year period of the plan (ie 2015-2020).

In making a case for a minor amendment to the Green Belt boundary and the allocation of this site for housing we consider that:

- In drawing up its Local Plan that the London Borough of Redbridge has not only failed to meet its objectively assessed housing needs (OAHN), but has failed to demonstrate conclusively with evidence that it can even meet its minimum housing target (based on the London Plan 2015) having regard to the sources of supply set down in Policy LP2 Delivering Housing Growth;
- The Local Plan should be extended from a 15 year (2015 – 2030) time horizon to a 20 year time horizon (2015-2035), which is becoming the standard for other Local Plans throughout the country;
- As the London Borough of Redbridge includes Green Belt, then in drawing up its Local Plan the Council should have regard to the NPPF which states at para 83 that authorities should consider amendments to Green Belt boundaries having regard to their intended permanence in the long term, and that they should be capable of enduring beyond the plan period. The London Borough of Redbridge has failed to do this. In drawing up Green Belt boundaries the NPPF at para 84 also advises authorities to promote sustainable patterns of development by considering channelling development towards urban areas inside the Green Belt boundary;
- Our analysis of the site against the five purposes of the Green Belt (para 8) clearly demonstrates that the development of this site will have a negligible impact on these purposes;
- The site is a sustainable site in a sustainable location well served by public transport with a bus stop adjacent to the main entrance.

DNS Planning and Design on behalf of the GDBA has previously submitted representations to the London Borough of Redbridge Local Plan. We set out our case in more detail below.

## 2. Issue 5 Objection to Policy LP2 Delivering Housing Growth

The London Plan 2015 (Chapter 3 London's People) has based its estimate of London's housing requirements on population growing by 2m by 2036 and household size falling from 2.47 to 2.34. On this basis its estimate of London's objectively assessed housing needs is 49,000-62,000 pa. However, its minimum targets by Borough for the 10 year period 2015-2025 only amount to 42,388 per annum (about 14% less than the lower end of the OAHN range). For Redbridge the minimum target is only 1,123 per annum, which contrasts to an OAHN as calculated in the North East London SHMA (May 2016) of 2,132 pa (2011-2033) – which is nearly double the minimum target set down in the London Plan.

The Redbridge Local Plan proposes to build a minimum of 16,845 units (based on the London Plan minimum target) between 2015 and 2030. This is well short of the OAHN set down in the NE London SHMA. Even if one considers Barking and Dagenham, Havering and Redbridge as one housing market area as per the NE London SHMA there is no indication that the adjoining Boroughs will meet any of Redbridge's shortfall in its OAHN (refer Table 1 below). I note that the London Plan minimum target and NE London SHMA OAHN requirement for Barking and Dagenham and Havering are more or less the same.

	<b>London Plan 2015-2025 Minimum target pa</b>	<b>NE London SHMA 2011-2032 – Annual requirement</b>	<b>Difference (SHMA OAHN - London Plan Min Target)</b>
Barking and Dagenham	1,236	1,264	+28
Havering	1,170	1,145	-25
Redbridge	1,123	2,132	+1,009
<b>Totals</b>		<b>4,541</b>	<b>+1,012</b>

Source: London Plan and NE London OAHN (May 2016)

Thus, in our opinion Policy LP2 Delivering Housing Growth fails significantly to make adequate provision to deliver sufficient houses to meet the Borough's OAHN as required by para 47 of the NPPF, and it is clear that this will not be made up by increased provision in the other Boroughs in the NE London Housing Market Area.

As such the Local Plan cannot be found to be sound, and we therefore propose that Policy LP2 be amended to ensure that the Borough will set out to meet its OAHN. The figure should be calculated on the basis of 2,132 dwellings per annum over the plan period as set down in the NE London SHMA

(May 2016), which is more up to date than the 2015 London Plan. We acknowledge that this target will present a major challenge. However, it is no different to the housing challenges facing other Boroughs in London. It is widely acknowledged that London faces a major housing crisis and that supply needs to be boosted.

With regards to the supply of housing sites, we note that based on its housing capacity work that the London Borough of Redbridge considers that it has a deliverable capacity of 18,774 units over the plan period. This is nearly 2,000 more units (11% higher) than its minimum target of 16,845. The Borough indicates that this capacity will come from the following sources: 5 Investment and Growth Areas (13,447 - 72%), Opportunity sites in the rest of the Borough (2,627 - 14%) and windfalls (2,700 – 14%).

Experience and evidence suggests that these estimates of capacity (supply) are likely to prove extremely optimistic:

- Delivery over recent years has been abysmal. In the period 2010-2015 only 1,756 new homes were built in the Borough, equivalent to 359 per annum, which is less than half the target set down in the adopted Local Plan target of 760 per annum. The new minimum target (1,123) is more than 3 times that figure, and the OAHN requirement (2,132 pa) is nearly 6 times higher. There are no indications that housing land supply and therefore housing delivery can be exponentially increased. Indeed, the housing trajectory is proposing to build more than 20% more homes in the first five year plan period than the minimum target – this is all very aspirational and there is no evidence to show that this increased rate of housing delivery can be achieved;
  
- The housing delivery from the Investment and Growth Areas is very optimistic. Having regard to land take for transport infrastructure, the timing and delivery of infrastructure investment, land ownership issues, land take for new schools and open space, the Borough's past record on housing delivery, and examples from elsewhere where planned housing delivery has rarely matched reality on the ground (with shortfalls of 20%-40% often recorded), then in my opinion delivery from these areas should be discounted by 20%, reducing the capacity over the 15 year plan period to 10,758. I also note that the Borough is indicating that 6,015 new homes (45%) will be built in these areas during phase 1 (2015-2020). This is also very aspirational and in my opinion not deliverable. Phasing should therefore be adjusted to provide a more realistic profile with delivery rates increasing during phases 2 and 3;



- Housing delivery from the opportunity sites from the rest of the Borough is also extremely optimistic for similar reasons, and I therefore consider that it would be appropriate to discount the yield from these sites by 20% to 2,101. The apportionment across three phases would appear to be acceptable;
- With regards to housing delivery from windfall sites (2,700) we note that this is applied to the last 10 years of the plan. It is unclear what has been the previous rate of delivery from windfall sites. However, it is likely to be significantly less than the assumed 270 per annum, given that the Borough has only averaged 359 completions pa for the past 5 years, with most of this supply coming from allocated sites. It is also unclear whether the windfall sites represent double counting as these will presumably have been picked up in the Borough's housing capacity work and its identification of opportunity sites. In our opinion therefore it would be prudent to remove windfalls as a source of housing supply.

Taking these factors together then housing delivery by location and plan phase requires radical adjustment. At most we anticipate delivery of 12,859 dwelling units over the plan period, a reduction of 5,915 on the Borough's supply estimate of 18,774.

This revised total is well below the London Plan's minimum target, and significantly below the supply needed to meet its OAHN. Consequently there is a requirement to identify and allocate further housing sites in the Local Plan Review. This will certainly involve making adjustments to the Green belt boundary where it is justified to deliver sustainable development.

### **3. Local Plan Time Horizon**

The Local Plan Pre Submission Draft 2015-2030 extends over a 15 year period. The majority of Local Plans have a time horizon of 20 years. For sound planning reasons I consider that it would be appropriate to extend the Local Plan period to 2035, or as a minimum to 2033, which would then dovetail with the NE London SHMA. This would require Policy LP2 Delivering Housing Growth to be adjusted to reflect the additional housing requiring of extending the Local Plan over a longer timeframe. It would also enable the Council to take a longer term perspective on Green Belt boundary adjustments to ensure their permanence into the long term in accordance with the NPPF (Section 9). Also, given the inevitable delays in taking a Local Plan through a public examination, consulting on proposed amendments (and possibly reconvening the public examination), the time taken for the Inspector to prepare his report together with time to adopt the plan it would be prudent in any event to consider rolling forward the start date of the plan from say 2015 to 2017, and then extending it to 2035.

#### **4. GDBA Site Assessed against Purpose of the Green Belt**

Green Belt is a strategic policy tool which is used to restrict development around and between Towns and Cities. It has five main purposes which are identified in the National Planning Policy Framework (NPPF).

- Purpose 1: To check the unrestricted sprawl of large built-up areas;
- Purpose 2: To prevent neighbouring towns merging into one another;
- Purpose 3: To assist in safeguarding the countryside from encroachment;
- Purpose 4: To preserve the setting and special character of historic towns; and
- Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The proposed strategy for a development delivering around 140 new dwellings (refer to DNS 01: Illustrative Masterplan) was analysed with regard to the five main purposes of Green Belt as set out in the NPPF as follows and is summarised in Table 1 below:

##### **Purpose 1: To check the unrestricted sprawl of large built-up areas.**

The sense of permanence provided by Green Belt designation is fundamental to the limitation of sprawl and it is the wholesale restriction that the designation places upon development that ensures that the outer expansion of urban areas remains heavily constrained thereby limiting 'sprawl'. However, well located and planned developments are unlikely to constitute 'sprawl' (a term that is based on negativity suggesting the unplanned, uncontrolled spread of development). Small pockets of land within a suburban location adjacent to the urban area and surrounded by residential development, visually isolated from the wider Green Belt designation by well-defined boundaries is less likely to impact on this Purpose than land that is more remote with uncontained with poorly defined boundaries.

On analysis of the site, it is almost entirely contained within the urban area and it lies adjacent to the urban area and has a well-defined boundary by identifiable landscape features. It can be described as a transitional area that relates more with the urban area than the countryside type landscape character to the south. The Green Belt currently has a weak, arbitrary and physically unidentifiable boundary where it currently crosses the site. A well designed and sensitive development in this location would provide a new defensible boundary with the urban area and prevent future sprawl.

### **Purpose 2: To prevent neighbouring towns from merging into one another**

The primary function of this Purpose is clear in that it is to prevent towns merging. However, it raises questions about whether closing the gap between towns without them merging (either physically or visually) would be acceptable, and whether the merger of other smaller settlements is strictly covered by this Purpose. The NPPF makes no mention of minimum distances (para. 2.9 of superseded PPG2 indicated that *“wherever practicable a Green Belt should be several miles wide, so as to ensure an appreciable open zone all around the built-up area concerned”*).

On analysis of the site, there is the potential for the intervening land in this location, which is located on the extreme northern edge of the Green Belt to accommodate residential development without prejudicing the physical and visual distinction between the settlements as the Greenbelt in this location does not lie between two principle settlements. Furthermore there is no intervisibility between the urban edges.

### **Purpose 3: To assist in safeguarding the countryside from encroachment**

Any Green Belt land around the periphery of the town may be said to fulfil this Purpose. It is the overall restrictive nature of Green Belt policy that protects the surrounding countryside by preventing development and directing it towards existing settlements. The former guidance provided in PPG2 made it clear that the quality of the landscape is not a reason for designating land as Green Belt; this is not included in the NPPF.

Where land is identified as possessing a strong unspoilt rural character the land will perform a more critical role in protecting the countryside from encroachment; in such areas any such encroachment is likely to have a far more significant adverse effect on the characteristics of the countryside and its perception compared to land that possesses a much weaker or semi urban character where the influences of development are already apparent and an intrinsic part of the prevailing character, where such areas may be deemed to contribute less to safeguarding land.

On analysis of the site, it has a suburban character heavily eroded by the surrounding urbanism. The wider Green Belt to the south has a much stronger countryside character. However, the site associates more with the urbanism to the north. Development of this pocket of land presents a positive opportunity to create a much stronger defensible boundary with the wider Green Belt and countryside to the south, safeguarding this area from encroachment.

**Purpose 4: To preserve the setting and special character of historic towns**

Woodford Bridge is not considered to be a settlement that has a particularly strong historical character. Whilst it has older parts and a conservation area, there is no strong relationship between these areas and its wider landscape setting provided by surrounding Green Belt land.

On analysis of the site, it was found not to provide any positive contribution to the setting of Woodford Bridge.

**Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict land**

It is the overall restrictive nature of Green Belt that, though its limitation of the supply of other development opportunities encourages regeneration and re-use of land.

On analysis of the site, as a result of a recent review by GDBA the focus of future guide dog training will be at a more local community level within new much smaller purpose built mobility centres. Consequently, this GDBA regional dog training facility will close and become redundant in the near future. This offers an opportunity for a comprehensive approach to be taken to the redevelopment, regeneration and recycling of urban land which will become derelict after the facility is closed. This includes land and buildings/structures which are part within the Green Belt and part within the built up urban area.

Table 1: Summary of Impacts on the Purpose of Green Belt

	Purpose of the Green Belt Designation as per NPPF	Landscape Impact	Visual Impact	Capacity for Change based on sensitivity
1	To check the unrestricted sprawl of large built-up areas.	Negligible	Negligible	Very low importance
2	To prevent neighbouring towns merging into one another.	Beneficial	Beneficial	Beneficial as opportunity to creates a more defensible boundary

3	To assist in safeguarding the countryside from encroachment.	Beneficial	Beneficial	Beneficial as opportunity to creates a more defensible boundary
4	To preserve the setting and special character of historic towns.	Negligible	Negligible	Very low impact
5	To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	Negligible	Negligible	Beneficial as recycling of urban land

## **5. Issue 6 Green Belt Review – Alterations to the Boundary**

The site is largely contained by existing development and already forms part of, and is perceived as, part of the urban area and has no impact on the purpose of Green Belt. The Green Belt boundary crosses the site along an arbitrary none physical boundary that is not definable by actual features on the ground, resulting in a poorly defined edge. A scheme of residential development will allow the opportunity to deliver much needed housing in a highly sustainable location and create a defensible boundary to the Green Belt, preventing the perception of sprawl and encroachment into land with a much stronger countryside character, without detriment to the overall appearance, integrity and openness of the Green Belt.

Moreover, there are no environmental and heritage constraints, the site is in the single ownership of the GDBA who have confirmed that the site is available and deliverable, and the site can make a valuable contribution towards meeting Redbridge's housing requirements without causing any harm.

The three sites in proximately to the GDBA site proposed by the draft submission plan for removal from the Green Belt and within less sustainable locations as compared to the GDBA site are listed as follows.

- Opportunity Site 156 - Repton Court, Claire House and Fullwell Avenue
- Opportunity Site 209 – Site at Roding Lane North, Woodford Green
- Opportunity Site 216 – Ashton Playing Fields, Chigwell Road, Woodford Bridge

The GDBA site is on the extremity of the north west edge of the Green Belt and its removal will result in a lesser impact on the 5 purposes of Greenbelt than the sites listed above that the draft submission plan is proposing to be removed and on balance its removal from the Greenbelt will not significantly outweigh the beenefoits of delivering a policy compliant scheme of 140 dwelling, 50% of which will be affordable. Furthermore, any receipt from the sale of the land will be reinvested directly into the charity reinforcing its vital work improving the lives of 1000's of blind and partially sighted people.

## **6. Issue 11 GDBA Site: Sustainable Site in a Sustainable Location**

The site is located in Woodford Bridge, a suburb of Woodford Green in the London Borough of Redbridge. Woodford Bridge itself has a very wide range of services and facilities including primary and secondary schools (Roding Primary School and West Hatch High School), a doctor's surgery (Roding Lane Surgery), Co-op supermarket, convenience shops, newsagents, specialty shops, hotels, a choice of pubs, restaurants and takeaways, dentists, playing fields and sports facilities, employment opportunities, other cultural activities etc. all located within 500m and easy walking distance of the site.

The site lies on a main bus route and is served by London Buses routes 275 and W14. The 275 (every 10 minutes in peak hours) connects to Barkingside, Woodford Green and Woodford Station, Highams Park and Walthamstow. The W14 (every 10 minutes in peak hours) connects to South Woodford, Snaresbrook, Wanstead, Leytonstone and Leyton. A bus stop is located adjacent to the site entrance on Manor Road.

Due to its location within comfortable walking distance to a wide range of services and facilities and on a main public transport route, the GDBA site can be described as a sustainable site in a highly sustainable location. Therefore, the site presents a very good opportunity to deliver 140 dwellings in a policy compliant manner together with 40% green infrastructure and 50% affordable housing should the inspector find a shortfall within the Plan.



## **7. Request to Attend the Local Plan Examination on Issues 5, 6 and 11**

We respectfully request a seat at the table for the sessions on Issue 5 (housing growth, housing numbers and affordable housing policies LP2), Issue 6 (Green Belt boundaries) and Issue 11 (other opportunity sites) at the local plan examination.

# Appendix 1: Drawings



Site Boundary

Green Belt Boundary

Existing Residential Areas

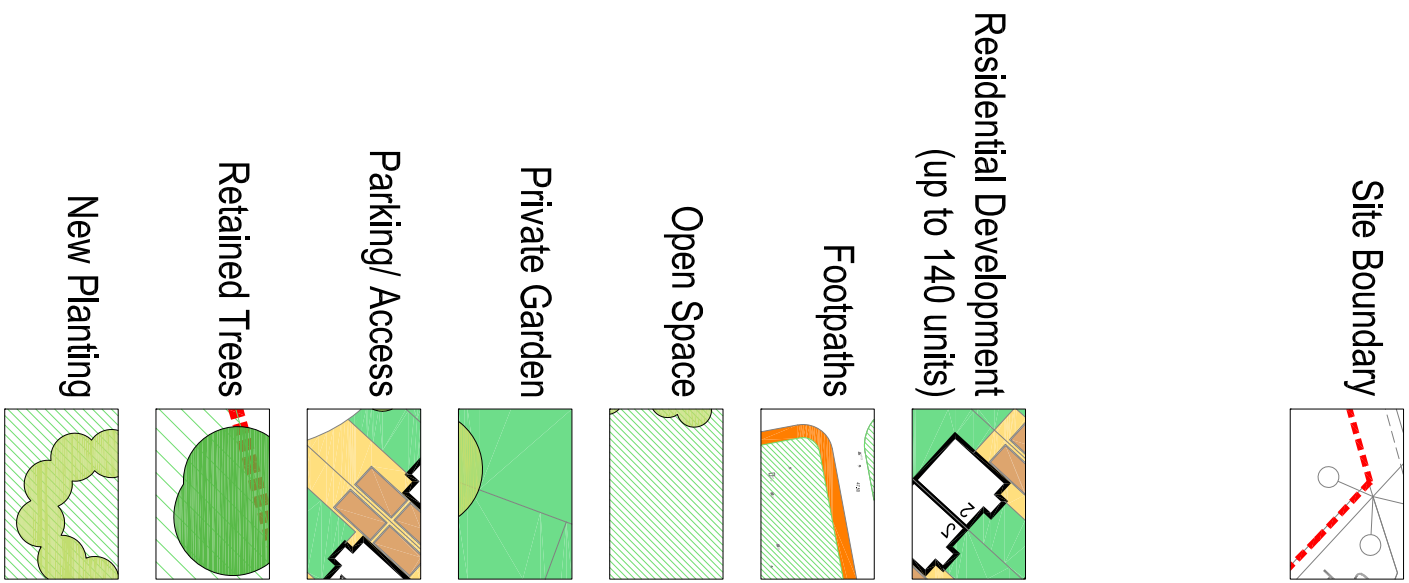
GDBA London Training Centre:  
Alternative Development Strategy

dns: planning|design

Character Areas

December 2014	1:000 at A3	DNS-01	rev.
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for Illustrative Purposes Only

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**GD&A LONDON REDBRIDGE**  
Sketch Proposals  
(for Illustrative Purposes Only)

**Figure:**  
**01. Illustrative Masterplan**

**Notes:**  
Do not scale this drawing. All dimensions are in millimetres unless stated otherwise.  
The client is responsible for checking all dimensions and report all errors and/or omissions to the Architect.  
This drawing is to be read in conjunction with the relevant Engineers' drawings or specifications.

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