

ISSUE 5 Housing Growth and Affordable Housing.

It is the considered view of the Green Belt Council that especially in London the private housing sector is almost completely dysfunctional for it has only delivered since 2010 a miniscule amount of affordable housing of c. 40 new units p.a. when Redbridge's total stock is c.100,000 ! --no wonder the no. of brownfield sites continued to grow so rapidly. In our opinion the inner London market has become in the last decade essentially a global investment market i.e. instead of meeting any indigenous housing needs they are with notable exceptions in the rented social housing market they have become investment commodities.

5i-ii) As is already well known that Epping Forest District is severely constrained by 2 main factors i.e. the very large amount of forest land protected by statute (1878 Epping Forest Act) and an extensive Green Belt . We understand L.B. Havering is still to complete its Green Belt Review although it has already purchased/acquired quite a few acres to add to its total. Besides Ebbsfleet which has huge potential for housing growth with c 150 units already built --why is Redbridge being so parochial in its vision? There is the Barking Riverside target of 10,000 homes with at least 40% affordable matched by the necessary infrastructure in the form of an extended Gospel Oak--Barking line paid for by public funds in excess of makes it a regional resource like the Olympic Park appealing to Redbridge residents as part of an East London market. Indeed the L.B Barking & Dagenham has described it as a key growth area to meet Redbridge's unmet needs. 1 We have already established there are already 2 Housing Markets in London and East London and the post BREXIT downturn needs to be factored in which may well slow down economic growth and reverse the very large immigration particularly from Eastern Europe. Moreover, in the early 2020s the continual increases in longevity may well start to plateau through rapidly increasing levels of obesity and diabetes taking a heavy toll.

iii-iv) Although there has already been " objectively assessed housing need" figures for the main Green Belt sites have like Oakfields and Billet Road the number of housing units have changed upwards and downwards at least twice and the amount of available land outside former pubs and garages and similar brownfield sites is uncertain. In respect of southern Redbridge the amount of land availability cannot be properly assessed until how much Green Belt land is released in part or wholly. To make good the shortfall is the Council proposing to increase the number of housing units at Sainsbury's and other major town centre site and utilise fully for Housing/Cultural Infrastructure on the footprint of Goodmayes Hospital site? There appears to be some considerable doubt also as to whether or not fields the existing land users e.g. Chadwell Heath Academy playing fields the existing Allotments and Brookside have all been factored in fully in addition to an enlarged Site of Important Nature Conservation.

v) According to my calculations made in 2016 the brownfield sites in Redbridge could yield according to their own figures up to 8-9000 housing units sufficient for at least 8 years

current financial year producing at least another 1500 units over a c 13 years ; and as Redbridge has much higher average for household size (Redbridge Local Plan p11 in 2011 of 2.82 up from 2.56 in 2001) there is a compelling case to include c. 750 completed household extensions p.a to accommodate extended Asian and Eastern European families. These additions could amount to the equivalent of over 11,000 units nearly all of which will be affordable unlike the unacceptable 8% at present thereby “making a major contribution to meeting strategic housing need “ In our view this statistic should have been highlighted in the various housing studies especially as p11 of the 2016 version states Redbridge has the 4th largest household size in the whole of England and Wales. Moreover, has the effect of amended permitted development rights to allow 6 metre extensions been fully evaluated from 2013? In summary, Redbridge has an adequate supply of brownfield sites suitable for housing particularly if the Council reduces the amount of new retail units in ILFORD town centre as it has already lost at least 4 flagship stores e.g. BHS, Littlewoods, Fairheads and Woolworths just in the last 7-8 years with the advent of nearby Westfield with over 150 stores .

vi) The Mayor of London refers to low housing densities in Redbridge especially in areas like Seven Kings and Goodmayes and in our view where there are an excessive no of takeaways fuelling more cases of both child and adult obesity exist surely on the grounds of improving public health there is a compelling case for a moratorium on all new fast food outlets; and where possible resist their continuance ;also replace commercial/ retail units by 3/4storey housing units especially within town centres and the original linear Crossrail Corridor i.e. as per 2011 report.

Vii-ix) In 2015 we calculated the number of housing units on c. 200 brownfield sites in Redbridge sites could yield up to 12,000 housing units but since then the list has been comprehensively revised (after a Freedom of Information request) downwards to yield under 9000 units excluding the proposed mayor Green Belt sites and new sites like Barking Riverside where there are likely to be at least 3000 affordable homes many of which could well serve the housing needs of Redbridge 's poorer/middle incomes so the comment by H Coomb every outer London Borough being in the same boat to Full Council July 2016 is very misleading especially as Redbridge is claiming it has now fulfilled its Duty to Cooperate so surely another 1000 plus units(does L.B. Havering have any spare housing capacity?—if not why not since it covers such a large land area should be added to the total from c 2021 onwards possibly as part of the inflated windfall housing figures. In short the 2017 list (apparently too long for a hard copy) is at its 3rd revision more up to date, realistic and deliverable than its 2014 counterparts.

In view of the above factors and the Mayor's October 2016 observations and the sizeable ongoing affordable housing deficit in Redbridge since 2010 the Green Belt Council feels strongly the policy under LP 3 under 1a Should be amended to 500 units a year particularly if somehow LB Redbridge starts to build over500 units in one year (compared to under 400 homes at present) with at least a regular affordable housing target of at least 40% rising to 45% when Barking Riverside and Government/GLA money comes regularly on stream from c 2022 onwards. Figure 12 P 39 Redbridge Plan 2016 Version. In view of its very poor record the Council requires a dedicated mini affordable housing team to realise its ambitious targets.

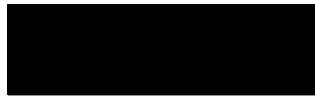
2022 onwards. Figure 12 P 39 Redbridge Plan(2016 Version) 1. In view of its very poor record the Council requires a dedicated mini affordable housing team to realise its ambitious targets.

END OF REPRESENTATIONS LONDON GREEN BELT COUNCIL IN RELATION TO:
REDBRIDGE LOCAL PLAN ISSUE 4 A CROSSRAIL CORRIDOR

ISSUE 6 EXCEPTIONAL CIRCUMSTANCES & THE GREEN BELT

ISSUE 5 HOUSING GROWTH AND AFFORDABLE HOUSING .

Appendix 1. LB Redbridge Fig 12 Housing Trajectory 2015-2030.



9th May 2017

3.8.9 The NPPF requires the Council to identify a supply of specific deliverable sites to demonstrate a 5 year housing supply. As Figure 12 shows, from 2010 to 2015, a total of 1,796 homes were built in the borough which resulted in a shortfall of 2,004 homes based on the Council's previous housing target (760 homes per year) set out in the London Plan (2011). In accordance with paragraph 47 of the NPPF, in order to make up this previous shortfall, the Council has sought to deliver 20% more homes in the first five years of the Plan. In addition, the Council places no reliance on windfall as a source of housing supply in the first 5 years of the plan period and focuses solely on the delivery of allocated Opportunity Sites. The windfall allowance of 2,700 homes is applied to the latter 10 years of the plan period (270 per annum for years 6-15).

3.8.10 Paragraph 47 of the NPPF aims to 'boost significantly the supply of housing', and in order to demonstrate the Council's ambition and commitment to achieving this, it has developed the Housing Sites Implementation Strategy (2016). This document sets out a strategy and the mechanisms through which the Council will seek to ensure a high level of housing delivery in the borough particularly over the first five years of the Plan.

FIGURE 12: Redbridge Housing Trajectory 2015 - 2030

