

REDBRIDGE LOCAL PLAN 2015-30

On behalf of the London Green Belt Council LGBC we are making further submissions particularly in respect ISSUE 4a, Policy 1B ISSUE 5 and above all ISSUE 6 relating to the loss of Green Belt. Bearing in mind L.B REDBRIDGE has identified no less than 200 Brownfield Sites in 2016 with no update collectively how many are being actively developed for housing and yet it claims without raising housing densities they are insufficient to produce at least a 5 year housing supply. The borough in 2016 declined my suggestion at full Council to appoint 1/2 progress officers to fast track the current dismal delivery of just 370 housing units p.a. , but inexplicably this sensible suggestion was turned down even though currently at a total of 338 every house virtually in Redbridge would have to be affordable! To avoid duplication within a very tight timetable I have concentrated on the severe threats to the Green Belt south of the A12 bordering a large area of Open Space deficiency, with no reference under the London and Home Counties Act to mitigate the loss of Green Belt by arranging a land exchange to protect the 30 or so playing fields/pitches displaced by the Councils wholesale land grab. The Green Belt Council is also very concerned that organisations like Wardell Armstrong have been allowed to produce biased and factually flawed 2017 reports which have not gone through the democratic committee process and made no reference to the representations by ourselves , London CPRE, Playing Fields Foundation etc.; but public bodies like the 2 hospital trusts have been included without any declaration of any vested interest like Fords even though they stand to make millions of pounds from the Green Belt declassification surely essential if Redbridge Council is claiming falsely in our view that such reports are independent.

In regard to the Inspectors 40 plus questions I shall start with the Crossrail Corridor Policy LP 1b ii except for Crossrail multi-billion pound programme Redbridge Council has produced virtually no evidence as a severely cash-strapped local authority or on behalf of the GLA there are any readily available funds for even modest investments in local highways, polyclinics/health facilities, or even schools. On the contrary it has taken over 9 years to replace one of its own swimming pools previously on a freehold site and rapidly expanding recent primary schools like Farnham Green have had to relocate their playing fields onto the Goodmayes Hospital Green Belt which could be lost under this Review without any re-provision plans?

ISSUE 4a Crossrail Corridor Policy LPID

1/2 No it should be named the Mega South Redbridge Growth Area as it is double the size of the Ilford IGA, and when Crossrail is complete in 2/3 years' time there appears to be very little money available other for schools and largely unaffordable housing - the official figure for Redbridge for affordable units is just 8%! Under the draft Local Plan 2015-30 the original narrow linear corridor hugging Crossrail itself has been replaced by of disproportionate huge dimensions for so called IGA in addition to 4 other IGAs which is at least twice the size of Ilford Town Centre which is far more likely to attract investment funds and has sufficient brown field sites for housing like Sainsbury's and TfL station car parks. The local authority has provided no explanation as to why it has suddenly repudiated its own sound Crossrail Corridor Action adopted in 2011 after extensive public consultation and a Public Examination. As queried under ISSUE 1v there has been no public consultation about these fundamental changes which will so adversely affect nearly all of the Green Belt south of the A12 without any financial gain to the Council to build new affordable housing to meet those in greatest need for example why is the Council so keen to line Fords ample pockets when there is so little mention of CIL to pay for extra traffic generation or health/social care when

hospitals like KGH could close – the Local Plan refers to building even inside the district general hospital surely unsustainable if hospital beds are further reduced .

iv In our view all 3 Strategic sites meet at least 2 of the 5 purposes of the Green Belt i.e. checking the unrestricted sprawl of large built up areas and they prevent neighbouring suburbs merging one into another. In addition the Council has itself recognised the special ecological value of the Seven Kings Water which traverses the A12 via the wide Happy Valley to the very large area of Green Belt to the north so this land is **Not** completely cut off as Colin Buchanan Reports have wrongly assumed; in addition Redbridge has now assigned in terms of nature conservation Grade 1 status to the whole of the Goodmayes site.

v) To our knowledge with the possible exception of the KGH site where exceptionally they have built on Green Belt a major district hospital and vital nurses' accommodation there have been few significant changes since its original designation. In addition on the Goodmayes site there are the very valuable allotments (Barley Lane)-where are they going to be transferred under the 1922 Act? In addition for the last 10 years 2 Redbridge schools 1 at primary and secondary level are using regularly the Goodmayes Hospital Green Belt which has survived for nearly 100 years.

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vii)-ix) The London Green Belt Council is of the view that given its Green Belt status and following the representations from the London Wildlife Trust L.B. Redbridge has belatedly recognised the whole Goodmayes site as a Grade 1 Site of Important Nature Conservation there are overriding biodiversity grounds to retain this site in tact especially as it adjoins the Blue Ribbon Seven Kings Water. We do not think a ten year bond is of sufficient duration and as developers have become very skilful in evading their affordable housing obligations in Redbridge the Council has enough robust powers as part of the integral planning process to ensure any bond is adequately funded to cover all reasonable/contingency expenses especially if there is no independent monitoring system which like Oakfield's Society and the London Playing Fields Foundation which we feel strongly is essential to deliver a fair system acceptable to all parties including individual clubs.

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In conclusion the London Green Belt Council requests in view of the representations above and those from London CPRE, Wildlife Trust, Aldborough Hatch Defence Assn. etc. this IGA is contracted substantially as per P 60 of the adopted Crossrail Action Plan (CCAAP) Sept 2011.

ISSUE 4 contd.

This option will respect the current Green Belt land at the Hospital sites and Fords and Seven Kings Park and the Blue Ribbon Seven Kings Water in addition to the existing large Open Space Deficiency not having to be expanded as a result of all the new housing.

ISSUE 6 Are there exceptional circumstances that warrant altering Green Belt boundaries?

On behalf of the London Green Belt Council in regard to the NPPF policies Redbridge Council like virtually all London boroughs has a major shortage of affordable housing as exemplified by the fact that since c2010 the % of such rented / social housing has steadily declined to just 8% while the number of brownfield sites has steadily grown to well over 200 and in late 2016/17 TfL just added a further 6 underground station car parks for residential purposes. In spite of the supposed objectively assessed housing need at least 3 local organisations and the LGBC have queried why the housing targets for Oakfields, the Crossrail Corridor itself and Billet Road have changed at least twice and the local Council has altered several times the housing targets for both Ilford and the former Crossrail Corridor without any explanation or widespread public consultation.

6 i- iii) The housing reports cited here have not revised their definition of affordability to well below 70% to offset the astronomical rise in house prices of over 300% since c2000 while average wages in east London have increased by less than 15%-20%. In this context there is virtually no evidence the release of Green Belt will solve the affordable housing shortage contrary to the principles of consistent Government policies as per the NPPF guidelines, moreover the GLA and Redbridge have given widely different housing targets but in any case the borough has already a ten year supply especially if household extensions c 1000 per annum are taken into consideration, and Redbridge having given the green light in this very plan to tall buildings in Ilford and even Goodmayes has not made the case to reduce retail space in view of nearby Westfield and the internet but sensibly reduced its employment space targets and declined at full Council our suggestion to increase the affordable housing target to c 45% and appoint 1/2 dedicated officers to tackle the brownfield sites mountain (full Council June 2016)

iv) As already established Redbridge (and the GLA?) have no dedicated budgets for large scale infrastructure, but it does have plenty of brownfield sites for schools/GP surgeries as per the Isaac Newton Academy on the Seven Kings High Road. Again the local Council has not provided any concrete/sound evidence why Green Belt has to be used at all; in fact it has rightly ruled out a road bridge across Seven Kings Water.

v) In regard to the latest Wardell Armstrong Feb 2017 report it is seriously flawed particularly in respect of the Goodmayes Hospital site which I understand has not closed;

Moreover, due to 2016 representations from the London Wildlife Trust the whole Hospital site is now a Grade 1 Site of Important Nature Conservation, and together with Fords and the Hospital sites and the non-culverted Seven Kings the Goodmayes site does have a country feel with a rich biodiversity. All these factors have been left out of even the latest Wardell Armstrong Report (2017) together with the fact the original 19th century hospital site footprint being used possibly for affordable housing and health infrastructure such as a polyclinic. Why if as politicians have repeatedly claimed these reports are truly independent when there is still countryside close to Willow Farm which we understand is still operating as an agricultural unit within the strategic Billet Road site accessible via Happy Valley from the hospital sites south of the A12 these beneficial factors have all been consistently left out. If Wardell Armstrong's definitions held sway then presumably very little of the Green Belt within the M 25 would remain especially if our powerful arguments are all rejected by the Inspectorate ; for instance, all Green Belt land south of the A 12 would be wiped out with no Epping Forest land in reserve so essential if developers all over the Greater London Region regard the extensive loss of Green Belt in Redbridge as a heaven sent opportunity/precedence.

6vi-vii) The impact of housing on the Redbridge Green Belt would cause irreparable and lasting damage for example even in the South of the borough the Council has not advocated any land swaps/exchange as per the 193 London & Home Counties Act; surely an essential move to protect the Goodmayes Park extension unless the Council strives as its 2nd Option for otherwise an unscrupulous developer could well duct out of their reprovision / maintenance obligations by trying to build on Goodmayes Park itself.to pay for a hefty CIL contribution The considerable harm of such housing would be exacerbated further by a staggering omission by Wardell Armstrong in their belated 2017 Report to include 2 large playing fields i.e. Farnham Green primary school and Chadwell Heath Academy which means the Goodmayes Extension could now be too small to accommodate 3 extra pitches. How can the Inspectorate ensure this shortfall is remedied on the Goodmayes Hospital site except by retaining its Green Belt status for presumably Redbridge is too late to commission yet another report which if at all independent will have to be carried out by a firm other than Wardell Armstrong especially if the quality of these pitches and at Oakfield have not been assessed let alone costed! This omission is even more incomprehensible given Collins A to Z Greater London map p126 marks it clearly as a large playing field which indicates how sloppy Wardell/Armstrong were given the Chadwell Heath Academy a large secondary school outside the Council's control has I believe either a long lease or even the freehold presumably negotiated by its legal department –why given the importance of the NPPF no-one from the consultancy picked this up especially as Farnham Green is a large primary school with no grass playing fields—surely in their case the Goodmayes Park extension is too far for young children to travel to even during the summer months.

Particularly these additional beneficial and other outside uses of the Goodmayes Hospital site and those on Fords to combat obesity left out of the above reports should be taken

fully into account especially unlike L. B Havering Redbridge has no plans currently to acquire any additional green spaces in the south.

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Issue 6 v

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ix)-x) Earlier as I suggested if the proposed infrastructure is scaled back particularly

in regard to retail and employment usage in the Crossrail Corridor while increasing the housing density on Brownfield sites such as Sainsbury's in Ilford, and taking into consideration out of borough sites such as Barking Riverside and Ebbsfleet we cannot foresee the need to alter the boundaries before the 2030s which are currently very robust especially in the south of the borough. In summary there are several sound reasons consistent with the NPPF policies to retain the existing Green Belt without constraining housing growth as Redbridge has failed to demonstrate virtually all c200 brownfield sites are accounted for in terms of planning permission and increased housing densities. Consequently, in July 2016 we advocated unsuccessfully for the Council to bring forward windfall sites and household extensions c1500 p.a. in addition to fast tracking all suitable residential sites by 1 or 2 dedicated progress officers as for the last 5 years there have been consistently well under 400 dwellings per annum – how without huge public subsidies how is Redbridge going to double its woefully inadequate delivery record?. Hopefully the Inspector will support our justified request for the original ^{15.4} so that Crossrail Corridor to be restored to the 2011 sensible/proportionate boundaries. In addition if the Green Belts especially in the south retain their protected status. Surely there is a compelling case to transfer this section to the chapter in the Local Plan on managing and enhancing the Borough's very precious environmental assets, moreover, it may also incorporate my suggested modification that Goodmayes Park extension is afforded extra protection via the 1938 Green Belt Act or the GLA accords this extension MOL status.

APPENDICES ISSUE 4

1. Text of Question to Redbridge Full Council and Response to Kevin Page 21st July 2016.
2. WARDELL ARMSTRONG Report Feb 2017 Green Belt Addendum Paras 1.16 Para 1.18 Para 3.17.1 Para 3.17.2 Para 3.17.3
3. REDBRIDGE LIFE SPRING/SUMMER 2016 Crossrail Corridor IGA Annotated to include existing Green Belt and existing residential areas
4. CROSSRAIL CORRIDOR AREA ACTION PLAN Foreword Sept 2011
Map 5.3 Original Size Map 5.4 Open Space Deficiency
5. London Wildlife Trust representations P 559 Redbridge Local Plan 2015-30 P 559
LP 39 New Bullet point 6
6. GREEN BELT (LONDON & HOME COUNTIES) ACT 1938
SECTION 15.

proposed target was a minimum target and that the Council was committed to maximising the level of affordable housing on all sites in the Borough.

By way of a supplementary question, Mr. Page asked, given that the Council had all these brownfield sites, the public wanted to know on a regular basis, and perhaps the planning inspector, how the Council were going to chase up developments of those sites rather than they becoming a brownfield site mountain as in the old days of the EU when we had butter mountains?

Councillor Coomb replied that she attended Duty to Cooperate meetings with other London Boroughs, and Boroughs which were outside the London area. She found that every Borough had the same problem with finding sites for houses and so sometimes, it was not possible for other Boroughs to accommodate the needs that we might have. As had already been said, we did have many brownfield sites, but were they all built on and delivered, they would still not deliver the number of homes needed. Regarding the final point about appointing officers to chase these things up, in the Local Plan was a whole section about the implementation and the monitoring of the Local Plan which would also include delivery.

Dear Mr. Page,

TEXT OF COUNCIL QUESTION AND RESPONSE - 21ST JULY 2016

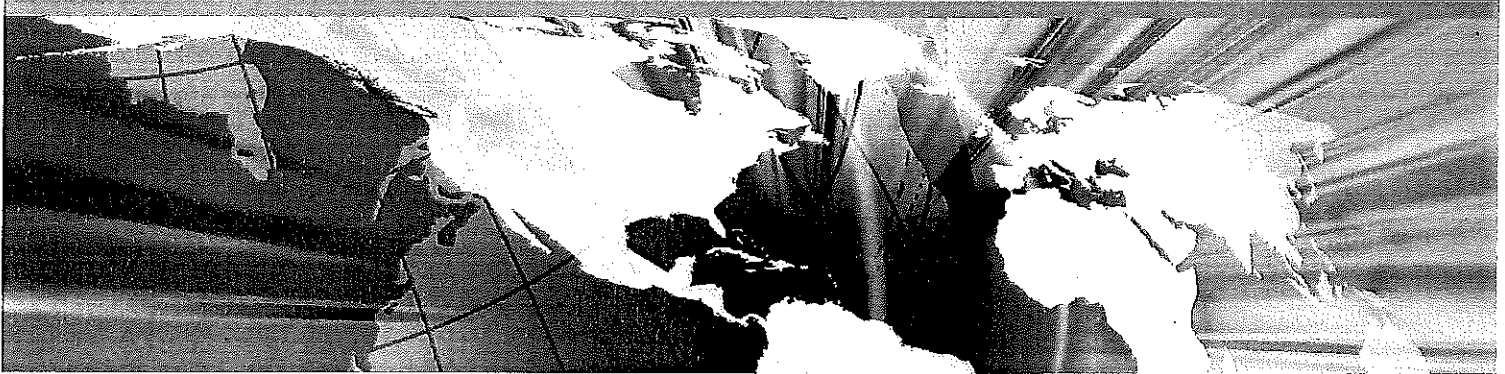
Please see below the text in respect of your question to the Cabinet Member for Regeneration, Property and Planning, Councillor Coomb, at the Council Meeting on 21st July 2016:-

Mr. Page asked the Cabinet Member for Regeneration, Property & Planning, Councillor Coomb, in respect of the draft Borough Plan and in regard to Policy LP3, will the Cabinet Member increase the amount of affordable housing target to 45%, instead of 30% (in line with GLA policies) and amend the draft Plan to at least 500 affordable homes per annum, instead of the woefully inadequate 336 as it stands, given that the Council, and most Councillors should know this, has no less than 214 brownfield sites which without touching the green belt could deliver at least 12,000 new homes?

Councillor Coomb replied that the London Plan 2015 sought to ensure an average of at least 17,000 more affordable homes per year are built in London. This was a London-wide target which all Boroughs will contribute towards achieving. The London Plan did not set individual affordable housing targets for Boroughs, rather it stated that, "Boroughs should set an overall target in LDFs (Local Development Frameworks) for the amount of affordable housing provision needed over the plan period in their areas." As stated in London Plan policy 3.11 C (f), when setting affordable housing targets, Boroughs should consider a range of factors including, the viability of future development, taking into account future resources as far as possible. In addition to this, paragraph 174 of the National Planning Policy Framework 2012 also stated that, in relation to Local Plans, the cumulative impact of policies should not put implementation of the plan at serious risk, so in order to address this, the Council had undertaken a Local Plan Viability Assessment and Community Infrastructure Levy Review in 2016 to inform the level of affordable housing which would be generally viable and deliverable in the Borough. This assessment found that, in most cases, housing schemes across the Borough could accommodate a level of affordable housing of between 20% to 40%. In order to address the acute level of housing need in the Borough, whilst also seeking to ensure that housing development remained viable, the Council proposed to adopt a Borough-wide affordable housing target of 30% in Policy LP3 and it should be noted, however, that the

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LAND AND PROPERTY
MINING AND MINERAL PROCESSING
MINERAL ESTATES
WASTE RESOURCE MANAGEMENT



LONDON BOROUGH OF REDBRIDGE

GREEN BELT REVIEW ADDENDUM

FEBRUARY 2017

your earth our world



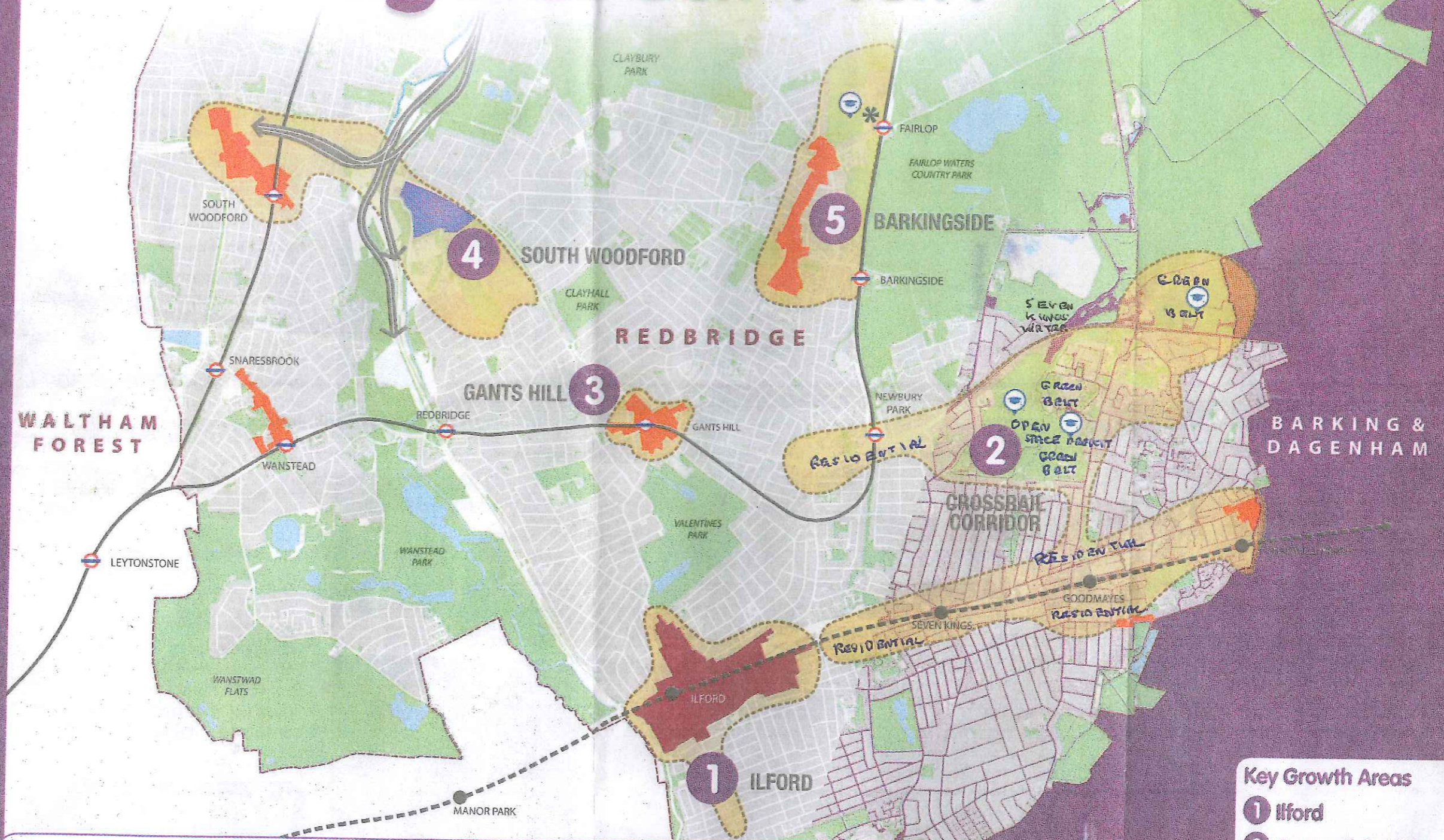
1.1.8 The Mayor's letter states: -

"The Mayor notes Redbridge's commitment to protecting designated Green Belt and Metropolitan Open Land (MOL); however Redbridge is proposing to release six Green Belt sites. The Mayor has made clear that in line with his manifesto pledge, he wishes to protect Green Belt land.

The NPPF seeks to protect the Green Belt and paragraph 83 states the Green Belt boundaries should only be altered in "exceptional circumstances" through the preparation or review of the Local Plan. The London Plan is clear that growth will be supported, but without encroaching on the Green Belt (policy 1.1 B a) and that Green Belt should be protected from "inappropriate development" (policy 7.16 A). The Mayor strongly supports the current extent of London's Green Belt. He believes that "exceptional circumstances" for the release of these sites has not been demonstrated."

- WB COLLISION NON CONFORMITY OF REDBRIDGE PLAN WITH LONDON
- 1.1.9 The Council is aware that some recent green belt reviews carried out by other local authorities have been criticised for focusing, solely or in large measure, on local interpretations and applications of the Green Belt purposes set out in the NPPF. The Council therefore has requested Wardell Armstrong to revisit and review the approach taken to the Green Belt purposes in earlier assessments of the Green Belt in Redbridge, to ensure that the assessment and conclusions are fully grounded in the Green Belt purposes as set out in the NPPF. The Green Belt within Redbridge, together with the conclusions of earlier assessments, has been reviewed in this context.
- 1.1.10 In the light of this and the representations and responses received in relation to the draft Local Plan, this addendum report, which should be read in conjunction in particular with the January 2016 Green Belt Review, provides further clarification of how the Green Belt parcels within Redbridge contribute to the five purposes set out by the NPPF.

Share your views on the Redbridge Local Plan



As well as looking at how we deliver housing and community facilities, the Plan also looks at wider planning policy challenges and addresses issues such as:

- requiring new housing developments to provide a minimum of 30 per cent affordable housing, with priority for the delivery of family sized homes
- improving existing employment land to ensure it is attractive to investors in order to maximise employment opportunities across the Borough
- maximising the benefits of Crossrail and promoting sustainable
- introducing new policies to manage housing conversions and Houses in Multiple Occupation and basement developments
- managing the clustering of the same types of shops in our Town Centres such as hot food takeaways and betting shops
- improving existing open spaces and protecting heritage assets
- promoting high quality design of buildings that respond

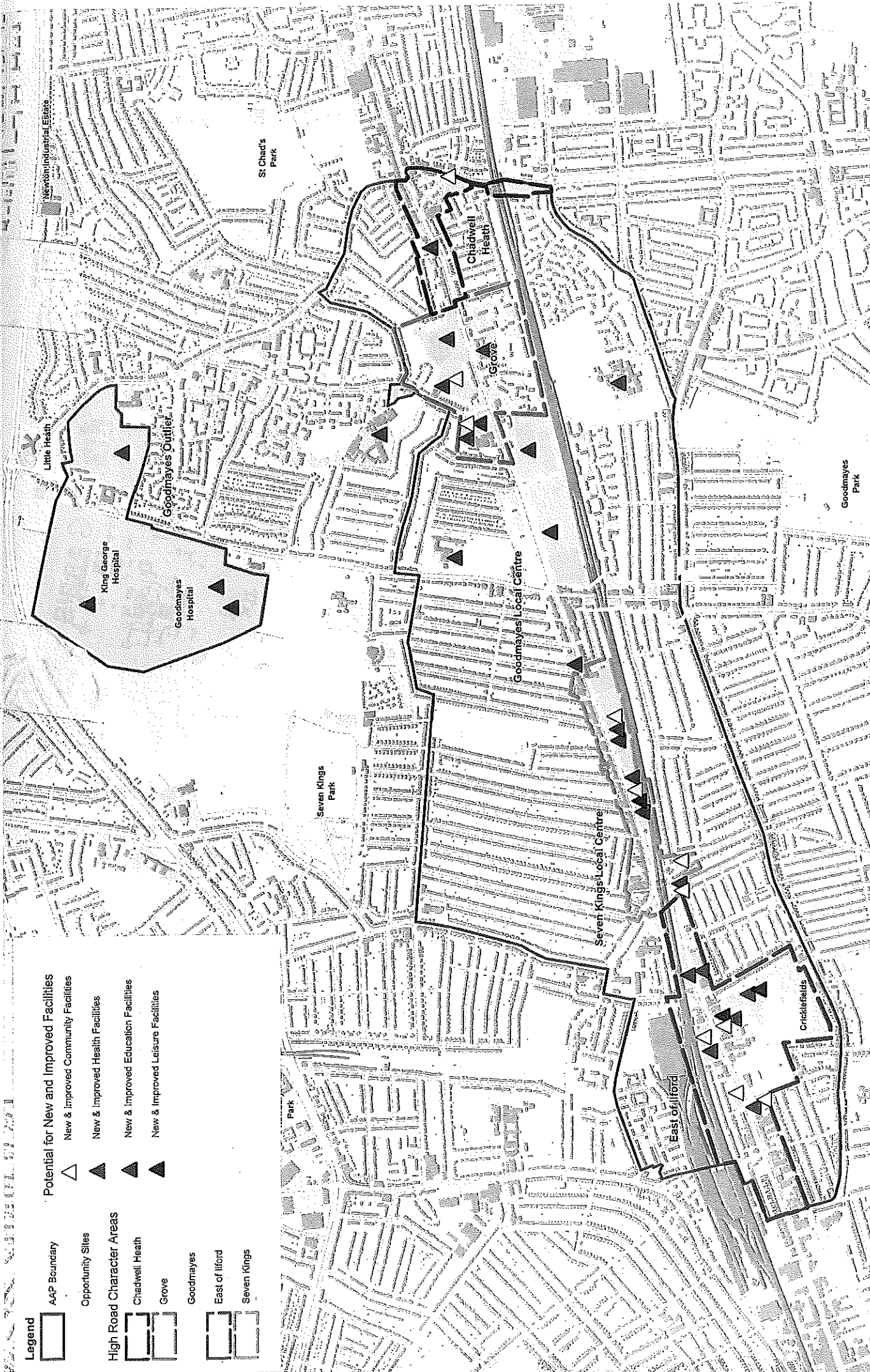
Key Growth Areas

- 1 Ilford
- 2 Crossrail Corridor
- 3 Gants Hill
- 4 South Woodford
- 5 Barkingside

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APPENDIX 4

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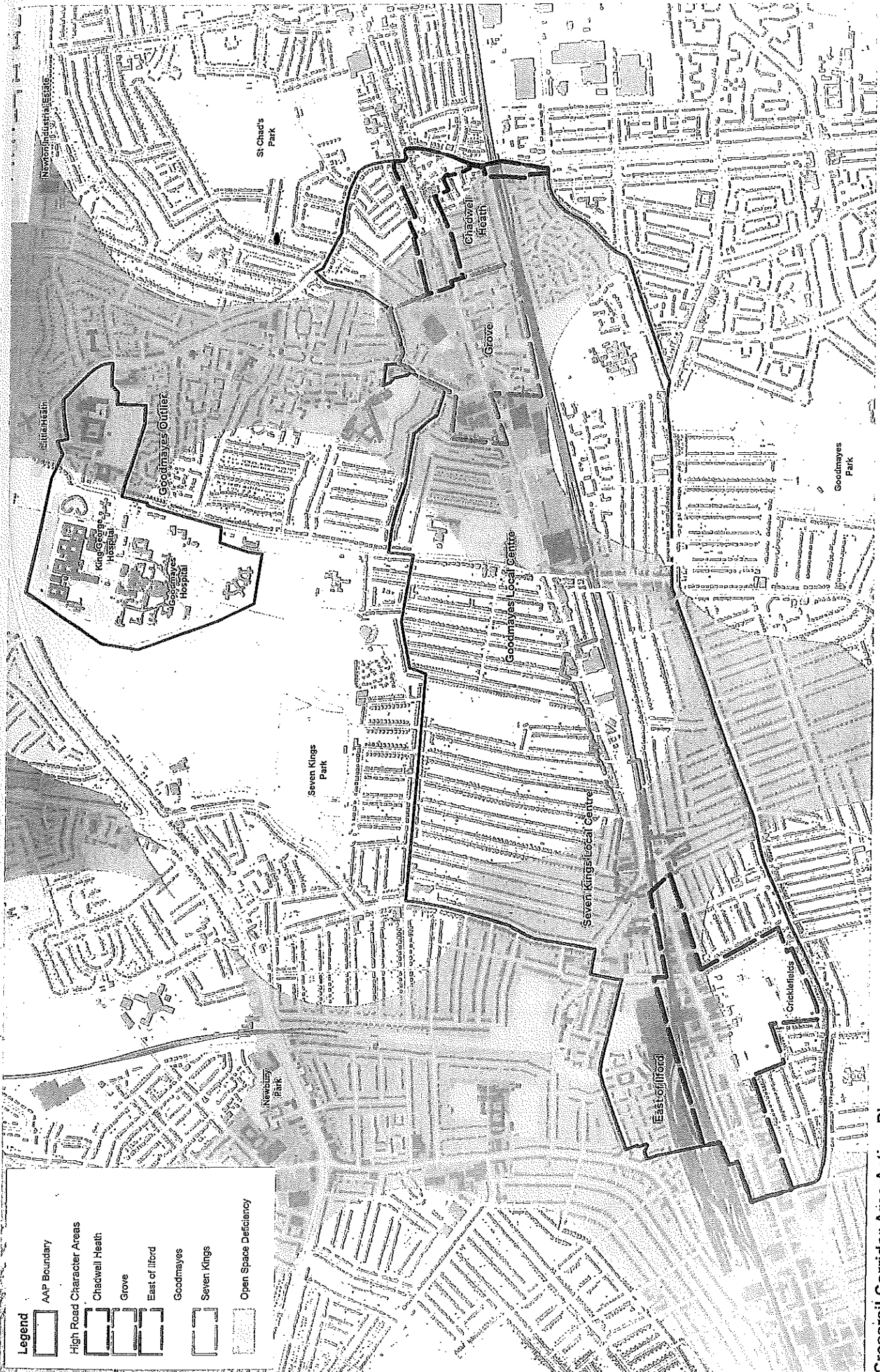
- Legend**
- AAP Boundary
 - Opportunity Sites
 - High Road Character Areas
 - Chadwell Heath
 - Grove
 - Goodmayes
 - East of Ilford
 - Seven Kings
-
- Potential for New and Improved Facilities
 - New & Improved Community Facilities
 - New & Improved Health Facilities
 - New & Improved Education Facilities
 - New & Improved Leisure Facilities

Crossrail Corridor Area Action Plan









Map 5.3 - Location of potential opportunities for new and improved community facilities within the Crossrail Corridor

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APPENDIX 4
ISSUE 4



Legend

-  AAP Boundary
-  High Road Character Areas
-  Chadwell Heath
-  Grove
-  East of Ilford
-  Goodmayes
-  Seven Kings
-  Open Space Deficiency



Scale 1: 11,000 @ A3

[1 & 2 GEO. 6.] *Green Belt (London and Home Counties) Act, 1938.* [Ch. xciii.]



CHAPTER xciii.

An Act to make provision for the preservation from industrial or building development of areas of land in and around the administrative county of London to confer powers for that purpose upon the London County Council and certain other authorities and persons and for other purposes. A.D. 1938.
[29th July 1938.]

WHEREAS with the object of enhancing the amenities of the administrative county of London and in the interests of the health of the inhabitants of that county it is expedient that provision should be made for preserving from industrial or building development areas of land in and around the said county :

And whereas the preservation as aforesaid of such areas of land (commonly referred to as "the Green Belt round London") would also be beneficial to the amenities of the localities in and near to which those areas are situate and to the health of the inhabitants of those localities :

And whereas it is expedient that for the purposes aforesaid such powers as are contained in this Act should be conferred upon the several local authorities referred to in this Act and upon the owners of land and the parish councils of parishes within the area defined by this Act :

- (a) to the erection of buildings on land acquired or proposed to be acquired under powers conferred or to be conferred by any enactment which specifies or specifically refers to the particular land to be acquired; or
- (b) to the construction or improvement of a road where the provisions of section 8 (Saving for highway authorities) of this Act apply; or
- (c) to the erection of a building under the powers preserved by section 11 (Saving for lines pipes sewers &c.) of this Act.

14. Where by reason only of a declaration made by a lessee for a term of years the provisions of this Act apply to any land those provisions shall cease to apply to that land on the expiration or earlier determination of that term. Leasehold land.

15.—(1) It shall be lawful for any local authority or parish council to exchange Green Belt land vested in them for any land within the area which is agreed by every contributing local authority and by the county council to be suitable for the purposes of this Act and of which the area is equal to or greater than the area of the land given in exchange: Power to local authorities to exchange land.

Provided that any such exchange shall be subject to the consent of the Minister—

- (i) where the land proposed to be given in exchange was acquired under the powers of section 3 (Acquisition of and covenants relating to land and contributions to cost) of this Act; or
- (ii) where such consent is required under any other enactment.