

Redbridge Local Plan

Further written statements based on issues and questions raised by the Inspector.

Responses by the South Woodford Society:

Pearl Arbennser-Simmonds	Chair
Nicky Tranmer	Vice chair
Tricia Darvell	Secretary
Louise Burgess	Vice-Secretary
Matthew Shaw	Treasurer

Committee Members

Rena Pathak

3rd May 2017

Please see responses in blue:

Issue 3

Is the overall spatial development strategy (Policy LP1) sound having regard to the needs and demands of the Borough; the relationship with national policy and Government objectives; the provisions of The London Plan and the evidence base and preparatory processes? Has the Local Plan been positively prepared?

Questions:

ii) Will the strategy satisfactorily and sustainably deliver the new development and infrastructure needed over the plan period?

In relation to South Woodford we are concerned that the level of infrastructure indicated will not be sufficient to support the level of growth envisaged over the plan period.

iii) Does the Local Plan strike the correct balance between residential and employment uses?

In relation to South Woodford the balance is skewed too much in favour of residential at the expense of existing employment sites. Having more residents and fewer local employment opportunities is only likely to exacerbate the existing imbalance militating against sustainable development.

Issue 4:

Are the Investment and Growth Areas properly defined, do they positively promote the spatial vision and objectives for Redbridge and are the expectations for growth justified and deliverable?

Questions:

ii) Will the infrastructure required for the Investment and Growth Areas be delivered in a timely fashion to keep pace with development? How is it to be funded? Does the Infrastructure Delivery Plan (LBR 2.21) provide sufficient certainty? How and when will the infrastructure be triggered?

In relation to South Woodford the IDP fails to provide the necessary degree of certainty that levels of infrastructure (physical, social and green) will be sufficient to address current deficiencies let alone keep pace with future levels of planned development.

Issue 4a:

Are the policies for the individual Investment and Growth Area justified, consistent with national policy and will they be effective (Policies LP1A-LP1E)? Are the strategic and key sites within each of the Investment and Growth Areas justified when compared to other reasonable alternatives, deliverable within the plan period having regard to any constraints and consistent with national policy? Is the detail about the sites adequate in respect of use, form, scale, access and quantum of development?

Specific questions for each Investment and Growth Area:

South Woodford – Policy LP1D

- i) Given the number of opportunity sites expected to come forward does South Woodford warrant the designation of Investment and Growth Area?

Local residents do not understand why South Woodford is allocated as an Investment and Growth area when the study of Wanstead to Woodford development corridor showed that due to the geographic nature of South Woodford and the volume of development that had already occurred in the area, there were limitations to how much more development would be appropriate bearing in mind the infrastructure limitations.

- ii) Is there a suitable balance between proposed residential and employment uses? How and where are the proposed retail and employment floorspace to be delivered?
- iii) Policy LP22 seeks to resist new development that results in unacceptable adverse impacts on the public transport system unless it incorporates effective mitigation measures. Would the proposals at South Woodford have such an impact due to capacity issues on the Central Line and what mitigation measures might be expected from individual developments? How do TfL intend to take this matter forward? To what extent will Crossrail relieve stress on the Central Line? Alternatively, are public transport capacity issues so serious that the amount of development proposed should be reduced?

South Woodford residents are concerned about the cumulative impact of the proposed housing and population growth when at peak times the Central Line is already operating over capacity. What is of greater concern is that housing on windfall sites will mean far more than the proposed 700 homes will be built during the plan period.

Crossrail is unlikely to alleviate congestion on our part of the Central Line east of Stratford plus increased pressures to build more homes in Epping Forest (Epping Forest District Council's housing requirement is approximately 11,400 new homes over the Local Plan period from 2011 until 2033) are likely to result in trains being more overcrowded before they reach South Woodford and beyond. Already a large number of people drive in to Epping from parts of Essex to pick up Central line as it is cheaper than using the mainline into Liverpool Street.

TfL has previously advised that the Central line has capacity limits which cannot presently be altered. Although beyond the direct scope of this plan, the South Woodford Society would like to take the opportunity to reiterate concerns expressed previously about capacity of the Central Line and the need to ensure that in addition to funding Crossrail 2, future investment in the Central Line is also maintained.

- iv) In response to R00104/02 the Council indicates that a scheme to signalise Charlie Browns roundabout and make improvements is under consideration. What is the latest position and is there adequate transport capacity generally to cope with the development proposed?

There are no considerations for signalisation of Charlie Brown's and no timeline for when TfL would be able to look at improvements. We understand that TfL have agreed to consult publicly about proposed new pedestrian crossings but there are no proposals for signalisation.

- v) Would there be adequate capacity for car parking within the Investment and Growth Area?

The Redbridge Local Plan (RLP) has earmarked 2 car parks as opportunity sites for residential development which would result in the loss of significant amount of car parking space in South Woodford:

Station Estate
South Woodford station car park

There is insufficient car parking in the area at present and any loss of car parking space would put additional burden on residential and high street parking. The council has not provided any supporting evidence of the impact on local businesses, residents and commuters that a reduction in the current level of off-street parking would have.

- vi) Does modification 33 to remove reference to a contemporary landmark within the town centre at Station Estate (site 117) affect the indicative capacity of 120? What is the justification for the change?

Local residents objected to the specification of design attributes in the Local Plan for a large building in Station Estate. It was originally earmarked as a tall building and when the Planners agreed to remove the reference to a tall building it was replaced with "contemporary landmark".

With the removal of a tall building & contemporary landmark it is likely that the capacity would be reduced.

- vii) Should Station Estate be earmarked for specialist accommodation for the elderly? What is the status of the adopted brief?

As mentioned in our representation on the draft Plan; due to the proximity to local shops and the station, a lower height and density proposal on Station Estate could provide much needed housing for the elderly and maybe a pocket park. HOWEVER please see comments to question ix regarding viable business space.

- viii) Would the Local Plan ensure the provision of sufficient and suitable infrastructure required as a result of the proposed growth and regeneration in South Woodford with particular reference to schools, health services, child care and leisure?

The RLP has no firm proposals for new schools, childcare or leisure facilities in South Woodford for the duration of period covered by the plan.

Schools

Of the proposed school expansion mentioned in the RLP:

Nightingale Primary School – 1 additional form of entry – will accommodate current demand.

Woodford & Ilford County High School – proposed additional two forms of entry to each school- these grammar schools are selected entry only and therefore would only benefit the top tier students who can attain the entry requirement. Children from outside the borough are also able to apply.

There are limited opportunities in South Woodford for further school expansions and it is unclear whether there are sufficient school places in the locality to accommodate projected demand (including windfall sites). The majority of new builds in the area are flats and in the past the planning department has **underestimated the amount of families who live in flats** and therefore underestimated the demand for school places. Is the child yield for flats lower than in houses when the majority of proposed housing for South Woodford is flats?

Many local residents in the immediate catchment area for Churchfields Primary School are unable to get their children into the school. When the children are allocated places away from their nearest school, parents are forced to travel greater distances which increases the level of car use; generating traffic, pollution, congestion and more parking pressure as a consequence.

The RLP says

“the local plan provides a supportive policy framework for the delivery of education facilities which are identified as a priority in the growth areas...(LP1D: South Woodford)”

Where will these new education facilities be delivered **in** South Woodford?

Childcare

Some of the comments regarding childcare places in the borough require further investigation. The study says:

“working carers often prefer childcare closer to their places of work so that they can respond quickly in an emergency. Only 17% of residents in work were employed in the borough according to the 2011 census”

Where does this statement come from? Many families use childcare facilities near their homes as it is most convenient for dropping off and picking up, plus, in places such as Canary Wharf and the City, there are very few childcare centres.

This means that there could be a **higher** demand for childcare facilities in South Woodford than what has been estimated by the Council. Without any investment, space or proposals for new nurseries in South Woodford, there will be insufficient provision of early years and childcare provision. Parents will be forced to travel across the borough for nursery places when their workplace could be in the opposite direction. This will generate more traffic and congestion as well as stress for families having to make longer journeys before and after work.

No additional Children's centres/services

South Woodford only has access to a "spoke" childcare centre which provides minimal services such as a weekly weighing session. There are no other children services in South Woodford and in spite of increased residential developments, South Woodford will not get any additional services.

Why is South Woodford an Investment and Growth area when there is no investment? Parents wishing to use the children's hub centres are forced to travel- increasing the level of car use; generating traffic, pollution, congestion and more parking pressure as a consequence.

All the opportunity sites identified in the plan have been earmarked for residential/retail mixed use, so it is unclear where any extra provision for schools, childcare and leisure could be located.

Healthcare

There is a new reference to the expansion of the Health Centre on South Woodford High Road but we question whether anyone from the Healthcare team at this site has been consulted. They were unaware of any proposals when we spoke to them at the time of the RLP consultation. To provide confidence of delivery we would expect to see a firm fully funded timetabled commitment in the IDP.

Leisure

South Woodford has a distinct lack of leisure facilities compared to other parts of the borough. South Woodford residents have to travel greater distances and sometimes outside the borough to access leisure facilities such as swimming pool, cycling centre, climbing wall, golf course, skate park & sports centre. These types of leisure facilities are focussed in the Hainault/Fairlop Waters area. Any potential areas in South Woodford which could accommodate these types of facilities have been earmarked for residential development so in spite of the classification of "investment and growth" area, there no proposals for increased leisure facilities.

Of the school swimming pools mentioned in the RLP (12.4) none are located in South Woodford; one is in a grammar school and the other is in a private school. This is hardly provision of access to swimming pools for local residents.

Not one of the five privately run leisure centres in Redbridge are in South Woodford. Two of them (Virgin Active and Nuffield) are incredibly expensive and out of the affordability of most local people.

Library provision

Can we check whether the 882m² of floorspace for South Woodford library (Table 11A) includes the space allocated to the gym operated by Redbridge Vision?

Community facilities

According to table 13A there are no community facilities in South Woodford.

- ix) Are the key sites identified justified when compared to other reasonable alternatives, deliverable within the plan period having regard to any constraints and consistent with national policy? Is the detail about the site allocations adequate in respect of use, form, scale, access and quantum of development?

All the sites identified for potential development are not vacant brownfield sites. They are economically viable sites that provide employment in the local area as well as a daytime economy for local shops. The proposals to develop these sites will have a hugely detrimental affect on employment opportunities in the area and the mix of employment choices.

There has been no study examining the impact of the loss of office space in South Woodford since the government removed planning restrictions when converting office space to residential. South Woodford has seen a huge loss of office space in sqm terms over the last 2 years and these proposals will further reduce access to affordable office space in local area.

Key sites

115 31 Marlborough Road and South Woodford station car park

As mentioned before, there has been no examination into the impact of the loss of the station car park to local residents and businesses.

Marlborough Road is a viable business space and inclusion of this site in the local plan is evidence of Redbridge council working against local employment opportunities and local businesses in South Woodford.

116 120 Chigwell Road

As mentioned in previous statements, the Environmental Agency noted that this site was NOT appropriate for non-water related developments. The Council has proposed to provide temporary housing on the site for Redbridge residents. Local businesses were served notice on their leases; again, evidence of Redbridge Council working against local employment opportunities and local businesses in South Woodford.

117 Station Estate

The site used to include KGM House which was an economically viable office space that provided local employment opportunities for local residents. The owners of the building applied for conversion into residential space and were granted permission. The businesses were given notice to quit.

The rest of the site is made up of other local businesses including a children's nursery and is an economically viable business area. It is not a derelict brownfield site. However, the Council sees this site as an opportunity for high density housing due to its central location near the high street and accessibility to local transport. Although the new proposals would be for mixed residential/office/business use, this is likely to be at elevated (as opposed to affordable) rents to take into account the new developments. This means access

to affordable business space has all but disappeared in South Woodford and with all the uncertainty, landlords will not offer longer leases on the assumption and hope value that they will be able to sell at a premium to a residential developer. Businesses which could relocate to South Woodford have been unable to do so as the investment in the buildings would be lost without being able to secure longer leases.

This is further evidence of the impact of Redbridge Council policies having the effect of working against local employment opportunities and local businesses in South Woodford.

119 Tesco Store

The South Woodford Society had highlighted the site to be included in a future neighbourhood plan as the site is large and any development would have a material impact on infrastructure in the local area. It is questionable whether the Council would have included this site had the SWS not included it in their Neighbourhood Forum planning area. It is next to the Charlie Brown Roundabout and would suffer from the same negative issues as site 120 Chigwell Road including excess traffic, pollution, increased car use and flooding. It is also juxtaposed against the Woodford Business Area and the inclusion of the Tesco site as a business location would make sense as the area already has, and is therefore well suited, to non-residential uses.