

**Issue: 11**

**Policy number: LP34**

Representor: Todcharm Limited

Representor number: RO/1083

Representor Agent: James Blake Associates Ltd.

## Examination of Redbridge Local Plan 2015-2030

### HEARING STATEMENT: ISSUE 11

Land at Roding Lane South, Redbridge

**Are the other development opportunity sites in Appendix 1 justified when compared to other reasonable alternatives, deliverable within the plan period having regard to any constraints and consistent with national policy?**

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The Black Barn, Hall Road, Lavenham, Suffolk CO10 9QX  
tel: **01787 248216** fax: **01787 247264** email: [jamesblake@jba-landmarc.com](mailto:jamesblake@jba-landmarc.com)

**Chairman:** James Blake - BA (Hons) Dip LA (Hons) CMLJ

**Company Secretary:** Louise Blake - BSc PGCE

**Directors:** Rachel Bodiam - BSc (Hons) Dip LA CMLJ ; Elzbieta Zebrowska MSc Eng LArch MScEnvSc CMLJ

**Associate Directors:** Mary Power BSc MSc MCIEEM ; Vivienne Jackson ; Kevin Slezacek DipArb MArborA

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Registration no. 8169866 VAT no. 512 4127 91

## **EXAMINATION OF REDBRIDGE LOCAL PLAN 2015-2030**

### **HEARING STATEMENT: ISSUE 11**

#### **Land at Roding Lane South, Redbridge**

- 1.1 This Hearing Statement on behalf of Todcharm Ltd. has been prepared in respect of Issue 11: Are the other development opportunity sites in Appendix 1 justified when compared to other reasonable alternatives, deliverable within the plan period having regard to any constraints and consistent with national policy?
- 1.2 The Inspector will note that the Todcharm pre-submission (i.e. Regulation 19) representation is found in the document "Bidwells for Todcharm Ltd" which can be found on the Council's website at [www.redbridge.gov.uk/media/3074/bidwells\\_todcharm-for-web\\_redacted.pdf](http://www.redbridge.gov.uk/media/3074/bidwells_todcharm-for-web_redacted.pdf). Those pre-submission representations were jointly prepared by Bidwells and James Blake Associates. James Blake Associates are now instructed by Todcharm Ltd. as their agent for the Hearing. Bidwells is no longer instructed, but James Blake Associates are being assisted by Andrew Blackwell, formerly of Bidwells but now at Wessex Environment Planning Limited.

#### **STATEMENT**

- 1.3 As the Council recognises in LBR1.04, the projected population growth in the Borough will generate significant development needs over the Plan period. Indeed, the objectively assessed housing need is nearly double that of the London Plan (2015) minimum housing target. However, the available non-Green Belt land is wholly insufficient to meet more than a fraction of development needs. There is therefore an acute need for development opportunity sites in both non-Green Belt and Green Belt locations, and exceptional circumstances justify Green Belt releases for the purposes of NPPF paragraph 83. Paragraph 85 encourages the release of Green Belt which is unnecessary to keep permanently open and this should be the first resort in development site selection.
- 1.4 Within Appendix 1 LBR2.06.1 there is significant reliance on the delivery of high density development, some of which is coupled with mixed development schemes to meet housing need. The cumulative unit total for sites in Appendix 1 is still far short of the full objectively assessed housing need. But even with the low target set in the Plan, such high density reliance means the total housing provision is at significant risk from the possible non-commencement or delay of a relatively small number of sites.

- 1.5 It is noted how LBR2.06 carries a 100% delivery probability of housing numbers from many sites based on broad masterplan assumptions. For Oakfield, Forest Road, Barkingside (“Oakfields”) (LP Site Number 103 in LBR2.06.1) this confidence is offered before any clarity has been given to alternative recreation provision.
- 1.6 An inconsistency with the application of NPPF paragraph 81 applies where Redbridge have allocated development on land at Oakfields. Paragraph 81 sees outdoor sport as a beneficial use of Green Belt. The London Borough of Redbridge should therefore first look to sites which are poor in their Green Belt function before losing well used recreation land to development. The amenity deficit from the loss of playing fields counts against the social role required of sustainable development and therefore the soundness of planning policies (NPPF paragraph 7). Its community value has been underestimated by the draft Local Plan.
- 1.7 Table 4 to LBR2.06 provides detail on how constraints to the capacity of sites have been assessed by the Council. However, it does not appear that the loss and reliable replacement of playing fields has been factored in to the constraint assumptions of Oakfields, which astonishingly has a 100% probability of delivery under Table 5. The extent of contractual periods for Oakfields and other development opportunity sites in the public sector are also not explained.
- 1.8 As far as mixed development sites are concerned, LBR2.06 invites scrutiny of Table 5 as to how constraints have been considered. However, that table is not remotely clear on the constraint assessment, which appears highly optimistic.
- 1.9 Appendix 1 relies on many sites with high densities and high dependency of near 100% delivery. Some are assumed early in the development process although not seemingly part of any certain planning application process. In addition, 2700 windfall sites are assumed within the total. The latter is a high windfall dependency.
- 1.10 The Inspector is invited to consider the dependency on this intense density of homes, particularly where some sites are not matched by SHLAA evidence. Table 5 to LBR2.06 confirms a “hike” between the 2013 SHLAA estimates and the housing numbers now attributed to the development opportunity sites. The most minor discounting of these sites would allow scope to consider other, more easily developed sites, such as Land at Roding Lane South (the representation site) as a reasonable alternative.
- 1.11 For the reasons offered in the Todcharm Ltd. pre-submission representations and Issues statements, confident delivery of some sites within Appendix 1 is not justified compared to the representation land. Its release from the Green Belt, and as an allocation for new homes, is however justified. It offers certain delivery for at least 60 homes as part of a sustainable pattern of development.

- 1.12 Todcharm Ltd have provided evidence elsewhere (including in its Hearing Statement for Issue 6) that the representation site would not impact on any of the purposes of the Green Belt, given its contained and "isolated" nature. The latter characteristic was recognised in an earlier Green Belt appraisal by Buchanan in May 2010.
- 1.13 The representation site is well placed to take advantage of public transport and easy pedestrian access to community facilities. The Inspector is invited to view the representation site, and to note the benefits of its location, including its juxtaposition to the local bus service route and short walking distance to the London Underground network.
- 1.14 The proposed amendments required to make the Plan sound are set out in the Bidwells response to the Local Plan Regulation 19 Consultation. These are reproduced for the Inspector in **Appendix A**. These proposed amendments relate to the pre-submission version of the plan, and may require adjustment if other modifications to the Plan are made. In this regard, Todcharm Ltd. notes the Revised Appendix 1 (LBR 2.06.1). A proposed entry in that Appendix for the representation site is provided at **Appendix B** to this Hearing Statement.

## **Appendix A**

Extract from Todcharm Ltd. Publication Stage  
Representation Form (Regulation 19)

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Extract from Todcharm Ltd. Publication Stage Representation Form (Regulation 19)

### **Contents**

- 1.0 Local Plan - Unsound
- 2.0 Proposed Solution and Modifications Necessary to Make the Local Plan Sound

## Appendix A

**These details accompany, and should therefore be read with, the full report of representation submitted on behalf of Todcharm Ltd.  
Objection is made to the retention of land at Roding Lane South within the Green Belt and failure to identify the land as suitable for residential development and public open space.**

### 1.0 Local Plan - Unsound

With a flawed approach to the Green Belt analysis the Council **do not have a sound plan basis** for the emerging Local Plan.

By choosing to dismiss the sustainable merits of the Representation Site (housing and public open space on a good public transport route) the plan has failed the four tests for soundness (paragraph 182 of the NPPF) as:

- 1) It has not been positively prepared
  - The scope to achieve development from a despoiled site (former landfill workings) that offers public open space with landscape / ecological improvements has been overlooked.
- 2) It is not justified
  - The Council have sought to place reliance on a wrongly applied Green Belt assessment and have not directly responded to the full counter evidence provided. Occasions to meet and discuss evidence issues with the authors of the Green Belt studies have been denied to test consistency with emerging policy for housing and open space.
  - There is insufficient recreational support from recognised sport and leisure consultees to justify another Green Belt release at Oakfield, Fairlop. This is an example where the Local Plan has leapt to a significant allocation prior to full engagement with consultees and the public and before properly testing reasonable alternative allocations.
  - As a result of these issues, the emerging Local Plan is not the most appropriate strategy and is based on defective evidence.
- 3) It is not effective
  - There is an urgent housing need and also policy encouragement for more open space. Delivery of houses in sustainable locations, and which are available, is key to this aim. The Plan is ineffective if it excludes such locations that are ideal for housing release incorporating (as in the case of the Masterplan proposals for the Representation Site) tree protection within significant proposed new open space.
  - To allocate land that is not available without known replacement of playing fields, such as at Oakfield, offers uncertainty of housing delivery.

## Appendix A

### 4) It is not consistent with national policy

- As set out in the attached Green Belt Statement, the Council's Green Belt assessment is flawed and inconsistent with the NPPF. In particular:

- The Representation Site serves none of the paragraph 80 Green Belt purposes.
- The inclusion of the Representation Site in the Green Belt is unjustified having regard to the paragraph 85 criteria:
  - The inclusion risks the Plan failing to meet identified requirements for sustainable development;
  - The Representation Site is not needed to be kept permanently open (and open space can in any event be provided in conjunction with housing development on the Site without a Green Belt designation); and
  - The inclusion of the Representation Site does not define a clear boundary, using physical features that are readily recognisable and likely to be permanent. On the contrary, it ignores the obvious boundary formed by the eastern bank to the River Roding. By contrast, the enclosed Green Belt Statement's suggested amended boundary in this location is logical and fully consistent with paragraph 85.
- The manner in which the plan has assessed the site is also contrary to a core principle established in the NPPF paragraph 17 i.e.

"not simply about scrutiny but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives".

- The 'consequences' of retaining the Council's proposed Green Belt boundary in this location are the loss of much needed homes (which would incorporate the protection of trees and ancillary public open space). That is inconsistent with the principles of sustainable development.

## 2.0 Proposed Solution and Modifications Necessary to Make the Local Plan Sound

As set out above and in the enclosed Green Belt Statement, the Representation Site should not be included in the Green Belt. Furthermore, to remove it from the Green Belt would allow a sustainable housing development to come forward without removing the presence of trees on the western boundary of the Representation Site.

Any concerns about the impacts of development on the Representation Site on the GB09 area to its west do not require a Green Belt designation, but may simply be addressed through:

- Tree protection through management;
- Creation of functioning public open space; and

## Appendix A

- Ecological management through legal agreement.

The retention of Green Belt only leaves the Representation Site as it is i.e. vacant with poor ground conditions and private. With a development proposal, as provided in the March 2015 Masterplan (Appendix 3 to the attached regulation 19 report of representations with 2016 Green Belt Statement), there is consistency with the aims of:

- Policy LP 2 Delivering Housing Growth
  - the Representation Site makes effective use for housing and public open space of an otherwise vacant area of land.
- Policy LP35 Protecting and Enhancing Open Spaces
  - new publicly accessible open space is provided
- Policy LP 37 Green Infrastructure and Blue Ribbon Network
  - this is particularly germane as the policy seeks measures to enhance green infrastructure, the biodiversity and water quality of the River Roding (it is to be noted that these very measures have repeatedly been offered in representations made to the Council in connection with the Representation Site since December 2014).
- Policy LP 39 Nature Conservation and Biodiversity
  - measures have been promoted as part of the Roding Land South redevelopment that meet this policy aim through enhancement measures for local habitats including along the River Roding.

In order to render the emerging Local Plan sound, the following modifications are proposed:

- Paragraph 6.1.7 should be amended to include reference to the Representation Site.

*"The borough's Green Belt was last reviewed in the 1990s. To inform this Local Plan, the Council undertook a number of Green Belt reviews, to assess if areas of the borough's existing Green Belt still meet the purposes as set out in paragraph 80 of the NPPF. As Figure 22 shows, the 2015 Green Belt Review identified that the following areas of the Borough's Green Belt do not meet the NPPF purposes:*

  - *Roding Hospital and Surrounding Area (parcels **GB11a**, GB11b and GB11c);"*

## Appendix A

- Paragraph 6.1.8 should be amended to remove the final bullet:  
*“However, it also identified that the following additional areas and boundary amendments did meet the purposes of Green Belt:*
  - *Land between Woodford Green (GB04) and Epping Forest Hatch and Woodford*
  - *Golf Course (GB05);*
  - *Boundary changes are recommended within Snaresbrook Crown Court and Walthamstow Forest (GB05) and Claybury Hospital (GB06);*
  - *The area of the land within of Hainault Fields (GB13) comprising Forest Park Cemetery and Crematorium.”*
- Figures 22 and 23 and the Policies Map should be amended to bring them into line with the Suggested Amendments Plan in the enclosed Green Belt Statement.
- The Representation Site should be included as a Development Opportunity Site (for housing within Phase 1 and with an indicative development capacity of 60) within **Appendix 1** to the Plan.

### **Inclusion within Appendix 1 of the Redbridge Local Plan 2015-2030**

*Site address: Land south of Roding Hospital*

*Size: 2.8Ha    Ward: Clayhall*

*Current use: Vacant*

*Proposed Use: Housing with public open space*

*Indicative Development Capacity: 60 dwellings*

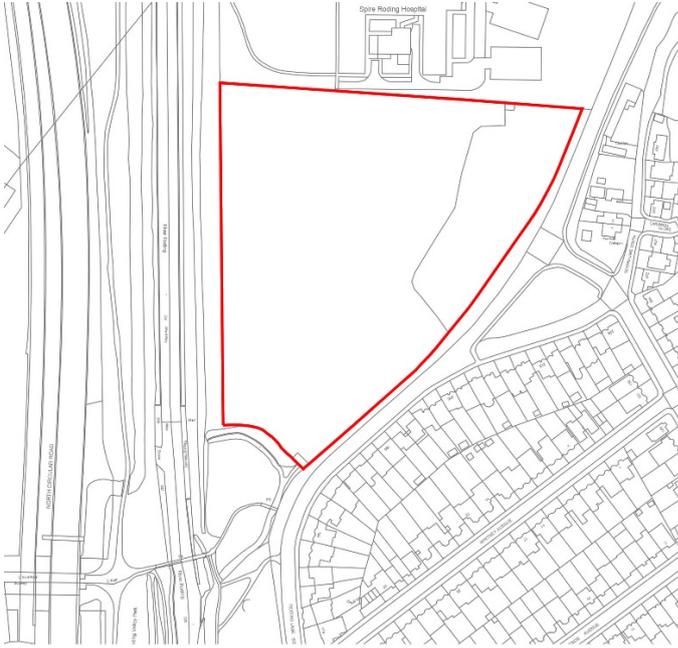
*Phasing Period: 2015-2020*

*Planning Status: No current planning application or new permission*

## **Appendix B**

Entry within Revised Appendix 1 of the Redbridge Local Plan 2015-2030 –  
Development Opportunity Sites (LBR2.06.1)  
Land south of Spire Roding Hospital, Roding Lane South

Land south of Spire Roding Hospital, Roding Lane South



**LP Site Number:** xxx

**Site Name:** Land south of Spire Roding Hospital, Roding Lane South

**Investment and Growth Area:** South Woodford

**Site Area (ha):** 2.8ha

**PTAL:** TBC

**Ownership:** Private

**How site was identified:** Representations

**Existing/Previous Use:** Vacant

**Proposed Use:** Housing and public open space

**New Homes:** 60

**Retail Floorspace:** 0

**Employment Floorspace:** 0

**Proposed Site Allocation Description:**

The site is proposed to deliver a new housing scheme of 60 dwellings with areas of open space.

Proposals should address distribution of open space to enhance existing green infrastructure and upgrade access to the River Roding.

The site is close to existing housing areas that are small in scale and new buildings will need to be sensitive to the amenity of neighbouring properties.

The site is located within a Site of Importance for Nature Conservation necessitating an appropriate design response to ensure biodiversity issues are properly addressed.

The site should be comprehensively masterplanned.

**Social Infrastructure:** None

**Planning Designations:**  
 Sites of Importance for Nature Conservation  
 Archaeological Priority Area

**Plan Phase:** Phase 1 – 2015-2020

**Planning Status:** No Current Planning application or new Permission