



ISSUE 4A

REPRESENTOR: FORD MOTOR COMPANY  
LIMITED & FORD SPORTS & SOCIAL CLUB

REPRESENTOR NUMBER: R01080

AGENT: ICENI PROJECTS LIMITED

# London Borough of Redbridge Local Plan Examination

Hearing Statement – Issue 4a

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ON BEHALF OF FORD  
MOTOR COMPANY LIMITED  
AND FORD SPORTS AND  
SOCIAL CLUB, NEWBURY  
PARK

Iceni Projects Limited on behalf of  
Ford Motor Company Limited and  
Ford Sports and Social Club,  
Newbury Park

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London Borough of Redbridge Local  
Plan Examination  
HEARING STATEMENT – ISSUE 4A

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# 1. INTRODUCTION

- 1.1 This Statement has been prepared by Icen Projects Limited ('Icen') on behalf of Ford Motor Company and Fords Sports and Social Trust (our 'client') in response to 'Issue 4a' of the Inspector's Matters, Issues and Questions (Week 1) for the London Borough of Redbridge ('LB Redbridge') Local Plan Examination. Issue 4a specifically asks:

*"Are the policies for the individual Investment and Growth Area justified, consistent with nation policy and will they be effective (Policies LP1A-LP13)? 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?"*

- 1.2 In particular, this Hearing Statement provides our client's response to Issue 4a, subsection 'Crossrail Corridor – Policy LP1B' (points i-xi) and specifically in relation to Strategic Site 'Ford Sports Ground' which is referenced in Issue 4a.
- 1.3 The enclosed comments build upon our previous representations to the LB Redbridge Local Plan process (December 2014 and September 2016), and in particular, in relation to Ford Sports Ground Strategic Site and what is required to ensure that Policy LP1B and the relevant sub-policies and supporting text is sound.
- 1.4 Previous representations have been recorded as: **R01080/01 – R01080/11.**

## 2. ISSUE 4A – INVESTMENT AND GROWTH AREA POLICIES

### Crossrail Corridor – Policy LP1B

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ii) Is the detail about the site allocations adequate in respect of use, form, scale, access and quantum of development? Could they provide the number of dwellings anticipated having regard to the concept masterplans (LBR 2.78)?

- 2.1 With specific regard to the proposed 'Ford Sports Ground' allocation identified in the draft Local Plan (site no.54, Revised Appendix A1 Development Opportunity Sites – April 2017), in our view the identification of an approximate capacity of 850 dwellings would appear to be broadly reasonable, having regard to the nature of the site and site constraints associated with flood risk mitigation, nature conservation and open space.
- 2.2 It should however be noted that the site area for the 'Ford Sports Ground' allocation as referenced in LBR 2.06.1 (Appendix A1 – Site 54) is incorrect. As noted in previous representations submitted on behalf our client (and indeed other representors) and following clarification sought in our client's September 2016 representations, the Site extends to c.16.0ha, not the 26.8ha referenced by the Council. We believe that this inaccurate calculation is based on the inclusion of the northern part of Seven Kings Park to the south of the Ford Sports Ground which was previously included within the same site allocation in previous iterations of the Local Plan, but does not comprise part of the allocation as now defined. Further, the current allocation at LBR 2.06.1 (Appendix A1 – Site 54) includes the Ilford Ambulance Station which falls outside of Ford's ownership. Clarification on this matter was previously sought under representation number **R01080/01**.
- 2.3 We note that the approximate capacity of 850 dwellings for the site allocation has derived from the Council's own Concept Masterplanning exercise (LBR 2.78), specifically 'Site 2 – Ford Sports Ground'. As detailed in previous representations, our client has carried out its own detailed masterplanning and capacity testing for the Site (2015), and identified the Site as having capacity for c.570 dwellings subject to the provision of 30% flats and 70% houses. It is however understood (as detailed in LBR 1.01.3) that the maximum standards within the London Plan Sustainable Residential Quality ('SRQ') density matrix have been applied to all of the Council's strategic development opportunity sites. The combination of the site area (16.0ha), a PTAL rating of 2 and location within an 'urban' area, the Site could certainly support a density of c.55 dwellings p/ha on the assumption of a higher provision of flats rather than houses.
- 2.4 Our client welcomes and supports the removal of the reference to 'hospital' facilities previously referenced in the modifications detailed in LBR 1.01.3; superseded by LBR 2.06.1 which now makes reference to 'residential' and 'education' land uses only. We also note that there is no longer a

requirement to re-provide the existing sports facilities on-site, or for these to be delivered at an alternative suitable location as per policy LP35.

- 2.5 As noted in paras. 5.39 – 5.4 of our client’s December 2014 representations, initial feasibility work has been carried out in relation to access and circulation. The two access / egress points at Aldborough Road South are within our client’s ownership and the initial feasibility studies, informed by the work of a Transport Consultant, demonstrate that the main access from Aldborough Road could be widened to sufficiently accommodate a development of this quantum. The initial feasibility study identified that the upgrade to the Ford owned element of Aldborough Road could support in the region of 1,000 dwellings at the Ford Sports Ground. Accordingly, on this basis, the access to the Ford Sports Ground should be considered a viable and deliverable option on the basis of the Council’s draft allocation for 850 new homes. On this basis, our client supports the soundness of the query relating to access within Issue 4a-iii.

**iv) Do the strategic sites meet any of the 5 purposes of the Green Belt in para. 80 of the NPPF?**

- 2.6 As detailed within previous representations (September 2016, pg. 3-4), our client supports the Council’s intention to release the land at the Ford Sports Ground from the Green Belt for residential-led development. Our client has reviewed and remains supportive of the ‘Green Belt Review Addendum’ (2017) which defines at paras. 3.17.1 – 3.17.8 that the Ford Sports Ground does not contribute towards the purposes of including land within the Green Belt as defined by para. 80 of the NPPF. Our client is therefore of the view that the Council’s approach to Green Belt review and release in relation to this site is sound when considered against national planning policy.

**vi) Having regard to paragraph 74 of the NPPF, would the loss of existing open space, sports and recreation buildings and land be replaced by equivalent or better provision in terms of quality in a suitable location?**

**viii) In sporting and recreational terms, is it justified to replace an existing established facility with a new one?**

- 2.7 LBR 1.01.2, Modification 23 relating to the Ford Sports Ground states that *‘in accordance with the NPPF, the loss of playing fields resulting from proposed development will be replaced by equivalent or better provision in terms of quantity and quality in a suitable location. Supporting facilities will also be re-provided’*. Policy LP35 states that it will *‘ensure the re-provision of playing pitches and facilities at Oakfield and the Ford Sports Ground to a suitable alternative location within the borough before the sites are redeveloped’*. As noted in our client’s September 2016 representations this wording undermines and potentially jeopardises the delivery / implementation of Policy LP1B – Ford Sports Ground.

- 2.8 We ask that you refer back to our client's representations of December 2014 where it clearly details the decline in use of the sports facilities at the Site over a number of years, this is a trend which has not been reversed since 2014. The representations detail the predominant private membership nature of the site. We therefore contend that the re-provision of the same quantum and quality of sports provision is unsound and in this case unjustified. In response to Issue 4a – viii, on the basis of the existing private membership of the site, we are of the view that it is unjustified to replace an existing established yet woefully underused facility with a new one.
- 2.9 As noted in our client's September 2016 representations, it is noted that the commitment within the Playing Pitch Strategy (2016) (LBR 2.43) to conduct further feasibility work regarding potential alternative locations for the re-provision of sports facilities has been carried out – specifically within 'Alternative Playing Pitch Site Assessment (2016) (LBR 2.44; 2.44.4) and 'The Pitches Replacement Assessment' (2016) (LBR 2.45). LBR 2.44 advises that the Seven Kings Park or Goodmayes Park Extension are the most appropriate locations for the relocation of the Ford Sports Ground facilities. However, the planning and development of the residential element of the Ford Sports Ground will ultimately be the responsibility of a private developer; and as such, the current wording of Policy LP35 would seem unreasonable and could constrain future delivery on the basis that the re-provision of pitches may potentially be the responsibility of a third party / the Council. This is noted at para. 7.7 of the LBR 2.44 which states that a period of 18 months would be required for site preparation of the new pitches and sports facilities prior to use. Our client would welcome further clarification on this matter – principally in relation to the party responsible for delivery of the replacement facilities.

**x) Are schools required on each of the allocated sites?**

- 2.10 Modification 18 of LBR 1.01.2 includes an additional requirement for Policy LP1B, Ford Sports Ground to accommodate a secondary school. This requirement has not previously been raised or discussed with our client as the landowner. The site-specific policy for King George and Goodmayes Hospital (Policy LP1B) also includes a requirement for a secondary school on the neighbouring land.
- 2.11 It is noted that the LBR Infrastructure Delivery Plan ('IDP') (February 2017) identifies a significant shortfall in secondary school provision over the Local Plan period, particularly from 2020 onwards. Para. 6.14 of the IDP states that the actual number of new schools required will vary depending on the quantum of places delivered through expansions and / or the size of schools delivered.
- 2.12 Para. 6.17 highlights four major comprehensive mixed use development sites as 'key opportunity sites' for the delivery of a secondary school (Ford Sports identified at para. 6.17 (2)). Para. 6.18 does however state that the provision of these schools is subject to a detailed masterplanning process as outlined in the Local Plan. As noted in our client's September 2016 representations we remain concerned that the provision of a secondary school has been included at the Site, prior to any detailed masterplanning or feasibility works being undertaken. It should be noted that the Conceptual Masterplan conducted by our client assumed the provision of the secondary school on the land south

of the Ford Sports Ground within Seven Kings Park, which we understand is owned and controlled by Redbridge Council. The provision of the secondary school will also need to be considered within the wider context of the quantum of new homes secured on the site and wider development viability.

### **Summary and proposed amendments**

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2.13 In summary, our client is supportive of the Council's intention to release the Ford Sports Ground from the Green Belt for the purpose of residential-led development, and is therefore broadly supportive of the strategic aspirations of Draft Policy LP1B and sub text for Ford Sports Ground. However, having regard to the above, we consider the following parts of the Local Plan are currently unsound, based on the latest wording of Policy LP1B and subsequent modifications as made by LBR 1.01.2:

- The reference to a need to re-provide the existing sports facilities prior to the commencement of residential development at the Ford Sports Ground and question over timescales and responsibility for delivery.
- The reference to the provision of a secondary school both within the Ford site, and without appropriate masterplanning.

2.14 We consider the Local Plan could be made sound by:

- (i) Including an amendment to the final paragraph of Policy LP1B, sub policy 'The Ford Sports Ground' to include reference to further masterplanning with the existing landowner (our client) on the basis of the independent Conceptual Masterplanning work carried out to date.
- (ii) Including clarification within Policy LP1B, sub policy 'The Ford Sports Ground' that the provision of a new secondary school is subject to identified need at the time of delivery and appropriate Masterplanning, including consideration of the land immediately south of the Site (Seven Kings Park) as a potential location.
- (iii) Removing reference to Modification 23 of LBR 1.01.2 which requires the re-provision of the existing private sports facilities *'before the sites are developed'*.

2.15 In addition, we feel that the Local Plan could be improved by:

- (iv) Including clarification within LP1B and Appendix A1 'Development Opportunity Sites' that the 850 figure detailed is an indicative capacity and subject to appropriate master planning. Appropriate wording could include: *"the exact number of dwellings the site can deliver will be dependent on appropriate masterplanning and technical / feasibility work which is reflective of current market conditions, relevant site constraints and planning policy requirements"*.

2.16 Finally, the site area for the Ford Sports Ground as referenced at LBR 2.06.1 (Appendix A1) requires amending.