

# Statement Regarding Wardell Armstrong Report Green Belt Review Addendum – LBR 2441 – Feb 2017

## 1.0 INTRODUCTION

- 1.1 My name is Howard Berlin. I practice under the name of Howard Berlin Chartered Surveyors. I give my professional qualifications as a Member of the Royal Institution of Chartered Surveyors. I am a RICS Registered Valuer. I am also a Member of the Institute of Revenues Rating and Valuation (Honours) and a Member of the Chartered Institute of Building.
- 1.2 I specialise primarily in valuation but part of my work involves planning issues.
- 1.3 I was instructed on behalf of Save Oakfield Society on the 22nd July 2016 to prepare a Green Belt Review into the London Borough of Redbridge plans to declassify Oakfield Playing Fields from the Green Belt (Metropolitan Open Land). Wardell Armstrong have prepared a new report (February 2017) and I make the following points by way of rebuttal.

## 2.0 PPG2 / NPPF ASSESSMENT

- 2.1 It should be noted that the original Green Belt review carried out in 2010 (Stage 3 PPG2 Assessment dated May 2010, (LBR 2.4.1.a) (4.1.1 Page 9) stated that both Hainault Fields (GB13) and Fairlop Plain (GB14) scored 12 points. This is the correct methodology in advising if green belt land should be declassified. It should be noted that nothing has happened in the location to alter the score. Neither has there been any change to this in NPPF Policy. There is no evidence of any material change from Wardell Armstrong (WA) or London Borough of Redbridge. It should be further noted that 12 points is the highest score for any Green Belt land in London Borough of Redbridge.
- 2.2 Fairlop Plain and Hainault Plain are the largest green belt parcels in Redbridge. The Green Belt designation should be viewed as a necessary protection to ensure continuing openness and prevention of urban sprawl.
- 2.3 Oakfield Playing Fields as part of GB 13 stops the merging of Barkingside and Hainault. Please see LBR 2.41.3 (Addendum Appendix) which is a map of Redbridge and shows the location of Barkingside and Hainault. In response to WA 2.1.7 you will note that WA have grouped Barkingside as one settlement with Ilford, Redbridge, Gants Hill, Clayhall, Grange Hill, Newbury Park, Aldborough Hatch, Seven Kings, Goodmayes, Little Heath, and Chadwell Heath.

This is a clear case of lack of understanding of the locality as how is it possible to link Seven Kings with Grange Hill (please see the location map)?

- 2.4** The Council's own consultants identified that development of Oakfield "would break the current urban edge" back in 2010. Therefore, Oakfield checks unrestricted sprawl all the way east to Hainault Forest Country Park and beyond and assists in safeguarding the countryside from encroachment. Set on the urban edge it assists in regeneration (e.g. Redbridge Sports Centre) as well as preserving the character of Barkingside, Fairlop and Hainault as the gateway to the countryside. A view of a map clearly shows that Oakfield prevents the merging of Hainault with Fullwell Cross and Barkingside beyond.
- 2.5** An argument for sub division of Oakfield Playing is based on housing in Forest Road and Fencepiece Road and the railway line that marks the border between Oakfield Playing Fields and the adjoining Green Belt land. This is a point raised in WA 3.4.7. By way of rebuttal there have been no "mapping errors" as indicated by WA. The fact is that they (WA) have not been provided of any evidence by Redbridge of the dates of the construction of the housing on Forest Road and Fencepiece Road. Oakfield's designation goes back to 1938 and all these houses were constructed prior to 1935. In fact, there was some housing pre 20<sup>th</sup> Century. As for the railway line this was constructed in 1902. As you can see WA have omitted this relevant evidence because they have neither researched nor have been provided correct evidence by Redbridge. The evidence therefore shows that there have been no changes in the location to demonstrate "exceptional circumstances".
- 2.6** It is disappointing to note that bearing in mind the importance of this issue, and that this matter is to be resolved by a Planning Inspector, that no information has ever been provided by Wardell Armstrong into the history of the housing and the railway line in this location.
- 2.7** There are no circumstances or even exceptional circumstances which prevail to give any basis for Oakfield Playing Fields or any Part of GB 13 to be released from its established green belt status.
- 2.8** Oakfield Playing Fields meet three criteria. They are:-
- 1) Urban sprawl;
  - 2) Merging of towns;
  - 3) Safeguarding of countryside. It should be noted that open land sports amenity fits the definition of countryside.

### **3.0 MAYOR OF LONDON REPRESENTATION**

- 3.1 It should be noted that the London Mayor (Greater London Authority) submission supports the contention that Oakfield Playing should remain as Metropolitan Open Land. It is the London Mayors declared policy not to build homes on the London Green Belt. This Submission is dated 11<sup>th</sup> Oct 2016.
- 3.2 This submission is consistent with the conclusion of the London Mayor in that Oakfield Playing Fields Green Belt and Metropolitan Open Space status should remain unchanged.
- 3.3 The London Assembly Planning Committee has produced a brief which reflects the Assembly's agreed position on the London Green Belt. This refers to Redbride and to Oakfield. It is attached as an Appendix.

### **4.0 LONDON BOROUGH OF REDBRIDGE**

- 4.1 Redbride Council in response to the campaign group Save Oakfield Site (SOS) Redbride have been rewriting their evidence base to support their plans to sell the land to a property developer. This includes removing evidence and previous reports produced by the Council and its consultants (including Wardell Armstrong) that undermines their own case on Oakfield. The latest February 2017 addendum is one of many. As an example, it reduces Oakfield to a single paragraph statement with a very narrow focus.
- 4.2 WA latest review, together with the previous reviews, are highly questionable and have been written for the sole purpose of finding Green Belt development sites for housing development. A Green Belt review should be independently written with the clear intention of assessing sites in terms of their importance for Green Belt. WA have failed to advise of the importance of Oakfield Playing Fields. Oakfield is part of the Barkingside community. A map of the location shows that Oakfield Playing Fields forms part of the Hainault Field. It is open and hold backs Barkingside merging with Hainault. Oakfield therefore contains urban sprawl.
- 4.3 Oakfield separates Barkingside from Hainault as per the LBR Local Plan Policy LP34(c).

## **5.0 SUPPLEMENTARY COMMENT**

- 5.1** We refer you to our own representation and evidence, which includes the Council's current and previous evidence base. We have been consistent throughout and clearly show that Oakfield meets NPPF and PPG2 requirements for Green Belt, locally important open green space, as well as Metropolitan Open Land, and should therefore be protected from development. In addition, there are no exceptional circumstances and no material change since designation. This has enhanced the land for sport and recreation.
- 5.2** A more detailed critique of earlier Green Belt Reviews was contained in the Save Oakfield Society Representation.

## **6.0 CONCLUSION**

- 6.1** There is no case for Oakfield Playing Fields to be declassified from its established designated Metropolitan Open Land (London Green Belt) status.

**Howard Berlin MRICS IRRV(Hons) MCIOB**  
**RICS Registered Valuer**

**11th May 2017**

## APPENDIX

### **Redbridge Review: Green Belt release – exceptional circumstances**

**The points made here reflect the London Assembly’s agreed position on the London Green Belt.**

National policy sets out that Green Belt boundaries should only be amended in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements.

Redbridge maintains the Council has demonstrated exceptional circumstances for altering the Green Belt - its high levels of housing and other development needs, heavily constrained land supply and lack of brownfield land represent ‘exceptional circumstances’.

As well as clarifications on the exceptions test, the HWP considers various changes to green belt policy, particularly around encouraging local planning authorities to look first at using any green belt land which has been previously developed and/or which surrounds transport hubs in Green Belt reviews. Again, the Council believes the Local Plan reflects this approach, with the proposed green belt release sites being located on previously developed land as well as in sustainable locations, close to public transport.

The Mayor’s letter (11 October 2016) challenges Redbridge’s assertion that it has insufficient sites to accommodate its objectively assessed housing need. Specifically:

- The Mayor suggests that through ‘Investment and Growth Areas’, the Crossrail Corridor, Ilford Opportunity Area and the borough’s Housing Zone should be able to accommodate the objectively assessed demand for housing in the borough.  
\* NB see note at end of this briefing.
- Moreover, the Mayor points to evidence in other Opportunity Areas that have delivered significantly higher housing capacity through densities at the higher end of the density matrix, particularly in areas of good public transport accessibility.
- Furthermore, the Mayor points to the emerging Strategic Housing Land Availability Assessment (SHLAA) as part of the current London Plan review. The SHLAA is a technical exercise to determine the quantity and suitability of land potentially available for housing development. It is a required part of the evidence base needed for the London Plan borough housing targets. The findings from the 2017 London SHLAA are expected to be published in the Autumn of 2017. The Mayor suggests he is optimistic this will identify new and additional housing sites.

### **Accommodating growth through small sites**

Moreover, more and more boroughs are realising the potential of small sites (0.25 hectares and under) which can deliver up to 50 homes. The current SHLAA says that small sites can deliver 100,000 homes. One of the options from the emerging new SHLAA might be a new focus on small sites which will also be present in Redbridge.

Smaller scale and infill schemes are less intrusive for existing residents and mean that residents can feel part of the regeneration process. They allow for a net gain in the number of homes without the need for disruptive 'decanting'. Furthermore, this approach can often be delivered relatively quickly.

The previous London administration's SHLAA also signalled that Redbridge could be doing more to deliver housing in Opportunity Areas and Town Centres. 2013 SHLAA, in terms of increasing densities in Opportunity Areas and Town centres, said "a number of ...boroughs also have potential for significant proportionate increases in capacity based on this scenario, such as Bexley, Enfield and Redbridge, which could help reduce the gap between need and capacity in these boroughs."<sup>1</sup>

## **Accommodating growth through selective intensification**

The Mayor highlights London Plan policy 3.3 (E) which identifies the types of locations anticipated to provide significant additional increment to housing supply – town centres, surplus non-residential land, general intensification and selective intensification of residential areas especially in areas with good public transport activity.

The overall thrust of the London Plan seeks to accommodate growth within London's boundaries without encroaching on open space or the Green Belt. The London Assembly's Planning Committee reviewed the Mayor's approach to accommodating London's growth in January 2016<sup>2</sup>. The Committee concluded that the existing policy of seeking extra housing capacity on brownfield sites, Opportunity Areas, town centres and suburban intensification was still a sound approach. It also concluded that higher densities could also be delivered sustainably if sufficient supporting infrastructure was co-ordinated with this intensification.

## **Sustainable development**

The NPPF is clear that Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

*Significant harm will be done by removing areas of Green Belt in Redbridge.*

The Green Belt areas in Redbridge proposed for release continue to perform important Green Belt functions. Local representations show that nothing has changed at the Oakfield Site, for example, since the designation was established. The Mayor supports the extent of Green Belt at other sites and suggests any boundary change should be "drawn tight around the developed land." For Fords he suggests a scheme which retains green space as MOL or 'open space re-provision.'

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<sup>1</sup> Paragraph 4.15, Strategic Housing Land Availability Assessment, Mayor of London 2013

<sup>2</sup> Up or Out: A false choice. Options for London's growth  
[https://www.london.gov.uk/sites/default/files/up\\_or\\_out\\_report.pdf](https://www.london.gov.uk/sites/default/files/up_or_out_report.pdf)

**Additionally, London's Green Belt performs many functions outside the five set out in paragraph 80 of the NPPF:**

- **It provides the locations for a large number of accessible sports sites supporting local and regional sports.** Oakfields which hosts a number of cricket and football clubs, and Ford Sports Ground which hosts the children's football East London and Essex League, are examples of Green Belt sites identified for housing in Redbridge's Local Plan that currently provide accessible sports to local people but also to Londoners from far outside the borough boundaries. This should be set against the context of a long-established loss of playing fields in the capital. Active Places Power (Sport England, October 2016) records a loss of football, cricket and hockey pitches in London since 1990 of 28 per cent, 42 per cent and 86 per cent respectively. The London Playing Fields Foundation has linked these losses with reductions in participation in sports, especially among London's school children.
- **Sport brings communities together and make a major contribution to community cohesion** Sports clubs and leagues are rooted in local and regional communities, often taking a long time to establish. Uprooting clubs from the local community, as is proposed in Redbridge, ignores the fact that they perform much wider functions than simply providing sports facilities. Sport England has shown this in 'How does sport bring communities together?'<sup>3</sup>
- **Accessible Green Belt benefits all Londoners:** 13 per cent of London's Green Belt is accessible to the public and London First's 2015 report shows that around 60 per cent of London's Green Belt is within 2km of an existing rail or tube station.<sup>4</sup>

**In February 2017 the Assembly's Planning Committee hosted a seminar on London's Green Belt where the further benefits of Green Belt, in particular potential future benefits, were discussed.**<sup>5</sup> Topics included the economics of the green belt, urban sprawl, intensification, brownfield and 'greening cities'. Speakers, panellists and delegates reaffirmed a commitment to protect the green belt and share ideas about how we can improve the value of London's green belt land so that its benefits are shared by all Londoners. Presentation topics included:

- As London grows in population and density there will be a huge premium on green belt in the future.
- Access to Green Belt land can be improved through new transport schemes
- Green Belt can be marketed for increased recreational use
- Market gardening ventures in the Green Belt can bring food production closer to consumers
- The green belt already plays and will in future play an even more vital role in environmental protection, acting as London's 'green lung' to improve air quality, increase biodiversity, and contribute to flood and water management.
- Green Belt's role in relation to climate change adaptation and mitigation, is becoming more and more important

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<sup>3</sup> <https://www.sportengland.org/our-work/partnering-local-government/scenarios/how-does-sport-bring-communities-together/>

<sup>4</sup> <http://londonfirst.co.uk/wp-content/uploads/2015/02/Green-Belt-Report-February-2015.pdf>

<sup>5</sup> The Green Belt of the future seminar <https://www.london.gov.uk/about-us/london-assembly/london-assembly-publications/green-belt-future-seminar>

- The Assembly recognises that a 21st Century Green Belt could offer more strategic benefits to London and explored options for enhancing the Green Belt and widening its purpose.<sup>6</sup>

\* Note on Crossrail corridor: Redbridge is now justifying release of Green Belt sites as part of Crossrail corridor.

The sites to the South have now been included in the Crossrail Corridor Investment and Growth Area. This is inconsistent with the iteration of Redbridge's original adopted 'Crossrail Corridor Area Action Plan 2011' which was formally adopted by the council following an Examination in Public. Why go through all that if the area can then be expanded substantially, as it has been, to include Fords, King George/Goodmayes and Billet Road sites. This does not seem justified. The local campaigner feels that Redbridge Council has just done this to justify the removal of Green Belt. The Inspector has asked an interesting question which is 'whether this should be called a corridor'. He is referring to the fact that it is no longer a corridor but an 'H' shape.

**Nicky Gavron,**

**Chair of the London Assembly Planning Committee.**

(Received by email 11<sup>TH</sup> May 2017)

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<sup>6</sup> Up or Out: A false choice. Options for London's growth  
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