

David Smith, Planning Inspector
By email to: copsleyandrea@gmail.com

11 May 2017

Dear Mr Smith,

CPRE London's further representations to the Examination in Public of the Redbridge's Draft Local Plan

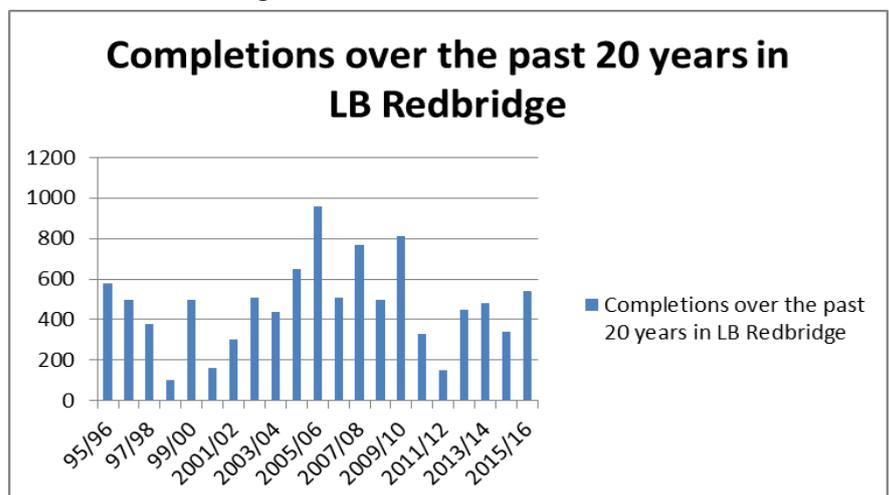
CPRE London is the London branch of the Campaign to Protect Rural England. We are a membership based charity concerned with the protection and enhancement of London's Green Belt, Metropolitan Open Land and urban open and green spaces. We have over 2,700 members. CPRE London members also have a wider interest in parks and open spaces and green infrastructure.

Having considered your questions and the London Borough of Redbridge's initial response and further documents, we would add:

Issues 5 and 6 - No case to remove Green Belt designations

- **Unnecessarily high land supply.** At the 2015/16 build rate (580), LBR is allocating land for a 32 year supply of sites i.e. for 18,936 new dwellings in total. Put another way, to achieve the expectation that 18,936 will be delivered in the plan period, the 580 build rate would need to increase by 2½ times (the plan period running to 2030/for 13 years). Even if build rates were consistently to reach 1,200 pa the plan would provide for a supply of sites for housing for 16 years i.e. well beyond the plan period. The Green Belt sites can be saved without compromising the ability of Redbridge to deliver. More difficult brownfield sites can be tackled in time, while easier sites are brought forward for early delivery.
- **Unrealistic new build targets:** LB Redbridge faces the same issues as the rest of London i.e. that it cannot force higher private sector build rates; and that there is limited funding to support new build in the social housing sector.

Figure 1: Redbridge's Local Plan anticipates a new-build delivery rate of nearly 1500 per year, which would be consistently much higher than that achieved over the past 20 years, even though there are no indications that either the private or social sectors will be able to deliver higher rates.



- **Even if the target of 18,936 is accepted as realistic (which does seem wrong), there are no exceptional circumstances.** Redbridge has argued that its high level of housing and other development needs, heavily constrained land supply and lack of brownfield land represent ‘exceptional circumstances’ however there are clear alternatives to increase densities further on already identified sites, make more use of small sites and densify suburban areas. Additionally the NPPF makes clear that housing need cannot justify the release of green belt (yet Redbridge is allocating green belt sites to support housing targets).
- **Green Belt constraint should have been applied to reduce OAN:** many councils have made a case citing a constraint such as Green Belt and LB Redbridge could easily do this while maintaining a challenging high new build housing target and preserving Green Belt. This would be achievable for the Plan period.
- **The Crossrail Corridor area appears to have been expanded to unfairly justify release of Green Belt areas:** a previous Examination in Public defined the area clearly as only the southerly corridor (excluding green belt sites). We cannot see how a justification can be applied retrospectively to expand this site to the proposed ‘H’ shape.
- **Green Belt areas continue to perform green belt and other vital functions.** The areas identified for housing do continue to perform green belt purposes: nothing has changed at Oakfield/Barkingside since the designation was set. They also perform other vital environmental functions (water, air quality & biodiversity management) and social / social cohesion functions (sports, leisure, community hubs).
- **Proposed Green Belt developments do not represent sustainable development: the harm outweighs the benefits.** Significant harm will be done if the green belt sites are lost because London’s protected green spaces are essential to the long term sustainability of London and as London densifies these sites will become more and more important for its future needs. Social harm will also be done because of the importance of the sports facilities (on two sites) to social sustainability locally and regionally. This harm drastically outweighs whatever marginal benefit might be gained from significantly over-allocating sites for housing, and we cannot see what benefit this achieves.
- **Affordable housing an infrastructure:** unrealistic housing targets are compounding already inadequate affordable housing levels and wider infrastructure provision.

Yours sincerely
 Alice Roberts
 Head of Green Space Campaigns
 CPRE London
 11 May 2017