

CED009 Council's Response to Issue 4a (Crossrail Corridor – Policy 1B)

Crossrail Corridor – Policy LP1B

i) Is the Crossrail Corridor aptly named?

- 1.1 Yes, the Council believe the Crossrail Corridor is aptly named. The overall vision for the Crossrail Corridor Investment and Growth Area is to deliver significant new homes, jobs and supporting infrastructure, delivering major benefits to the borough.
- 1.2 The arrival of Crossrail will act as a catalyst for economic growth and inward investment, playing a major role in bolstering and further enhancing the area, beyond the Crossrail route itself.
- 1.3 As set out in the Council's Statement to Issue 4, question i) (document, CED007), the boundaries of the Investment and Growth Areas are 'conceptual', specifically to illustrate the overarching strategic approach to development. They are not intended to be prescriptive with definitive boundaries. This reflects paragraph 156 of the NPPF and the need to indicate broad locations for strategic development in the plan.
- 1.4 By naming the area in this way, the Council is recognising the cumulative effect of growth and transformational change anticipated to come forward in this location. Furthermore, the allocation of the three strategic sites to the north represent opportunities for increasing connectivity, by improving the quality of pedestrian and cycle connections linking Goodmayes station to the north of the Corridor.

ii) Are the strategic sites 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? Could they provide the number of dwellings anticipated having regard to the concept masterplans (LBR 2.78)?

- 2.1 Billet Road, King George and Goodmayes and Ford Sports Ground are considered justified when compared to other reasonable alternatives. A range of growth options have been tested through the Sustainability Appraisal process. In 2016, the Local Plan Sustainability Appraisal (LBR1.11.) tested a total of 12 options for growth, including several that excluded any development at these sites. These options can be seen in

table 6.2 and 6.3 of LBR1.11. This appraisal made it clear that some options perform better than others, and informed and supports the Council's preferred strategy. As set out in paragraph 8.2.3 of LBR1.11.2, particular considerations included that:

- 2.2 A lower growth option involving nil growth at the above sites would compromise the achievement of important housing delivery objectives without leading to a plan that performs notably better in terms of other strategic objectives (recognising the merits of this site, and the potential to address issues at the site through policy and committed plan implementation).
- 2.3 A higher growth approach would help to meet objectively assessed housing needs more fully, but would compromise achievement of other important objectives (e.g. higher density development would lead to challenges from a community infrastructure delivery perspective).
- 2.4 In response to representations received on the Pre-Submission Plan, most notably the Mayor that further consideration of town centre intensification was needed before Green Belt release, further reasonable alternatives were assessed in the Local Plan Sustainability Appraisal Interim Report 2017 (LBR1.11.2). As set out in table 2.4 of LBR1.11.2, this tested various combinations of urban densification and Green Belt release, which included one option of no Green Belt release. The findings of this appraisal, as set out on page 33, are that this option performs poorly against the SA Framework on a number of matters; as a result of a shortfall in secondary school provision, lower levels of growth to meet housing needs and support economic growth. Furthermore higher urban densification was identified as having negative implications for townscape and character.
- 2.5 In addition, individual Green Belt parcels, including the above sites, were assessed against the SA Framework in document LBR 1.11.2. This appraisal found the above sites to perform better against the SA Framework than several other Green Belt sites put forward by developers, on account of:
 - excellent access to public transport, town centres and open spaces; and
 - proposed delivery of three new secondary school.
- 2.6 The above sites are considered deliverable within the plan period having regard to constraints and national policy. The Council considers the main constraints covering the sites to be:
 - the presence of existing pitches on Ford Sports Ground; and

- its existing Green Belt designation.
- 2.7 As set out in response to questions (v) below, the Council has identified the potential to reprovide the existing level of sports provision currently located on the Ford Sports Ground to the Goodmayes Park Extension. Proposals set out in LBR 2.44.6 demonstrate how set out the sports provision and facilities at Ford Sports Ground could be replaced by equivalent or better provision in terms of quantity and quality at the Goodmayes Park Extension. This approach would be consistent with NPPF paragraph 74. As the site is identified for development in the final phase of the plan, this constraint can be overcome within the plan period.
- 2.8 Regarding the Green Belt designation, the Local Plan seeks to remove this designation on the basis of:
- the borough having exceptional circumstances for amending Green Belt boundaries; i.e. its development needs and lack of developable land;
 - the site not meeting any NPPF Green Belt purposes; as set out in the Green Belt Addendum (LBR2.41.1); and
 - the need to promote sustainable patterns of development when reviewing Green Belt boundaries; as set out in paragraph 84 of the NPPF.
- 2.9 On this basis, the Council's proposals for the site are consistent with national policy.
- 2.10 Detail about the site allocation is considered adequate for Local Plan purposes. Note the Council's response to Inspector's Preliminary Questions in response to the detail about the site allocations use, form, scale, access and quantum of development (LBR 2.06.1). Details provided in the Billet Road, Ford Sports Ground and King George and Goodmayes Hospital policy box under policy LP1B, C and D, and Revised Appendix 1 (LBR2.06.1), set out detailed requirements for new homes, infrastructure, and open space. This is further supplemented by the Green Belt Conceptual Masterplan (LBR2.78) which sets out:
- broad locations for the different uses anticipated on site, including identifying areas for residential development, new education and open space;
 - access points, both in terms of primary vehicular access, and pedestrian access points and links that will improve site permeability;

- indicative guidance on building form with reference to a mix of housing and flats, and buildings to respect local character; and
- guidance on development quantum – both in terms of residential and social infrastructure requirements .

2.11 The concept masterplan demonstrates that the level of proposed development; with necessary community infrastructure can be accommodated on-site and is deliverable. The masterplans have undertaken a thorough assessment of each Green Belt site, including existing land uses, topography and landscape, ecology and archaeology, access and permeability and character and context. Whilst conceptual, the masterplans seeks to enable the delivery of an appropriate density of development to ensure the design solutions can deliver the density range set out in the London Plan Policy 3.4. Proposals also seek to encourage a mix of housing development in accordance with LP1 - Spatial Development Strategy; LP2 - Delivering Housing Growth; and LP6 - Dwelling Mix.

iii) How would the development of the strategic sites promote sustainable patterns of development?

3.1 As set out in the Local Plan, the Crossrail Corridor Investment and Growth Area includes three distinct centres: at Seven Kings, Goodmayes and Chadwell Heath. Each centre is set to benefit from a new Crossrail station, and includes a range of underutilised sites on and around the High Road that offer scope for new housing and an improved business and retail offer. To the north of these centres, the Corridor also includes larger strategic sites (proposed for release from Green Belt) that offer scope for housing led mixed use development that also incorporates much needed infrastructure such as new schools.

3.2 Paragraph 84 of the NPPF requires that account should be taken of the need to promote sustainable patterns of development when reviewing Green Belt boundaries. Development of the strategic sites therefore seeks to provide a reasonable distribution of growth across the borough, whilst also maximising opportunities to pool contributions towards supporting infrastructure investment. Development in these areas can also help sustain and enhance existing nearby town centres.

3.3 The contribution each individual site can make towards promoting sustainable patterns of development is set out below.

King George and Goodmayes Hospitals

- 3.4 Development of the site would represent an extension of existing urban areas surrounding it within the Crossrail Corridor, and efficient use of brownfield land given the presence of existing hospital buildings. The sites proximity to Goodmayes Local Centre (in comparison to more remote Green Belt parcels proposed for retention such as GB14 Fairlop Plain and GB15 Hainault Country Park) means that residents will be well served by existing amenities, investment and growth planned around the nearby centre, and improved public transport connections to central London.
- 3.5 The Oakfield and Goodmayes Transport Study (LBR2.52.2) details existing nearby cycle routes (figure 2.7), bus routes (figure 2.10), and existing local services (figure 2.22), all of which demonstrate that the site provides a sustainable location. This study concluded at paragraph 7.2.1. that “pedestrian accessibility to the wider area is reasonable and numerous local amenities and facilities including medical, schools, shops and banks located within a considered (east) and acceptable (west) walking distance from the site” and that “many surrounding services, amenities and other settlement areas can safely be accessed by cycle from both sites within a 0-15 minute journey time.” The site can therefore promote a sustainable pattern of development by minimising the need for residents to make car journeys for their day to day needs.
- 3.6 The site has been tested against the Sustainability Appraisal Framework, alongside some other Green Belt parcels put forward for development by landowners. As set out in table 2.3 of the Local Plans Sustainability Appraisal Report 2017 (LBR1.11.2), King George and Goodmayes Hospitals performed favourably against this framework, primarily on account of the intention that the site include on-site education and health uses, which other appraised sites do not offer scope to deliver. This is considered particularly important as alternative appraised sites would increase pressure on existing schools in the west of the borough; where opportunities for new school provision are limited. In this regard, the site helps promote a sustainable pattern of development by matching housing growth with new infrastructure provision.
- 3.7 Site size also means that King George and Goodmayes Hospitals can contribute to a sustainable pattern of development, by:
- accommodating a range of dwelling types and tenures that supports mixed and balanced communities
 - supporting on site open space enhancements

- securing improved site permeability that enhances pedestrian and cycle movement within the site and the wider area, and upgraded links to Seven Kings Park and Goodmayes Local Centre.

3.8 Finally, as set out in the Local Plan, the site also offers potential for the incorporation of a Decentralised Energy Network, which can help contribute to carbon reduction targets, and enhance the sustainability credentials of development.

The Ford Sports Ground

3.9 As the site is adjacent to King George and Goodmayes Hospitals, The Ford Sports Ground offers similar opportunities to promote a sustainable pattern of development.

3.10 Again, development of the site would represent an extension of existing urban areas surrounding it within the Crossrail Corridor. Proximity to Seven Kings and Goodmayes Local Centres means that residents will be well served by existing amenities in these centres, and investment and growth planned around them. They will also benefit from improved public transport connections to central London via Crossrail, and existing connections via the nearby Central Line station at Newbury Park.

3.11 The Oakfield and Goodmayes Transport Study (LBR2.52.2) considered The Ford Sports Ground as part of the wider Goodmayes site, and as such its findings and conclusions about the sustainability credentials of the site apply. In addition, as set out in the Local Plan Sustainability Appraisal Report 2017 (LBR1.11.2), The Ford Sports Ground also performs favourably against the Sustainability Appraisal Framework; primarily on account of the intention that the site include on-site education and health uses, which other appraised sites do not offer scope to deliver. The site therefore helps promote a sustainable pattern of development by matching housing growth with new infrastructure provision.

3.12 Site size also means that the Ford Sports Ground can contribute to a sustainable pattern of development, by:

- accommodating a range of dwelling types and tenures that supports mixed and balanced communities
- supporting on site open space enhancements
- securing improved site permeability that enhances pedestrian and cycle movement within the site and to amenities in the wider area.

Billet Road

- 3.13 Development of the site would represent an extension of existing urban areas surrounding it within the Crossrail Corridor, and beyond the borough boundary to the east. The sites proximity to Chadwell Heath Local Centre (in comparison to more remote Green Belt parcels proposed for retention such as GB14 Fairlop Plain and GB15 Hainault Country Park) means that residents will be well served by existing amenities, investment and growth planned around the nearby centre, and improved public transport connections to central London. The site is also close to existing retail and community facilities at Rose Lane in Barking and Dagenham.
- 3.14 The Billet Road Transport Study (LBR2.52.1) details existing nearby cycle routes (figure 2.4), bus routes (table 2.3), and existing local services (figure 2.18), all of which demonstrate that the site provides a sustainable location. This study concluded at paragraph 7.1. that “pedestrian accessibility to the wider area is reasonable, with numerous local amenities and facilities including medical, schools, and shops within an acceptable (south) distance” and “many surrounding services, amenities and other settlement areas can safely be accessed by cycle from the site within a 0-15 minute journey time”. The site can therefore promote a sustainable pattern of development by minimising the need for residents to make car journeys for their day to day needs.
- 3.15 The site has been tested against the Sustainability Appraisal Framework, alongside some other Green Belt parcels put forward for development by landowners. As set out in Appendix 1 of the Local Plan Sustainability Appraisal Report 2017 (LBR1.11.2), Billet Road performed favourably against this framework, primarily on account of the intention that the site include on-site education and health uses, which other appraised sites do not offer scope to deliver. This is considered particularly important as alternative appraised sites would increase pressure on existing schools in the west of the borough; where opportunities for new school provision are limited. In this regard, the site helps promote a sustainable pattern of development by matching housing growth with new infrastructure provision. In addition the site was also noted to provide opportunities to support regeneration opportunities in adjacent Barking and Dagenham, and secure the provision of publically accessible open space in an area of open space deficiency.
- 3.16 As set out in the Concept Masterplans Green Belt Release Sites (LBR2.78), Billet Road also offers scope for improved permeability to St Marks Gate Estate, where some local services exist. Site size also means that a range of dwelling types and tenures that support mixed and balanced

communities can be provided, further contributing to a sustainable pattern of development.

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

4.1 Through the preparation of the Local Plan, several Green Belt Assessments have been conducted. An initial assessment of all Green Belt in the borough against PPG2 purposes was carried out in 2010. This was then supplemented with additional assessments against the NPPF in 2013 and 2015 of sites that had been subject to representations through Local Plan consultations (including Billet Road). All findings were then collated and updated with a comprehensive review of all Green Belt against NPPF purposes in the 2016 Green Belt Review (LBR2.41). As this included some local interpretation of national policy, it was then supplemented with an Addendum (document LBR2.41.1), which ensured site assessments and conclusions reached were fully grounded in NPPF Green Belt purposes. It also responded to representations received on the Pre-Submission Plan.

4.2 Taking each of the Strategic Sites in turn:

King George and Goodmayes Hospitals

4.3 All site assessments have consistently concluded that the site does not meet any Green Belt purposes. The 2010 study (which is included in Appendix 1 to LBR2.41) noted that the built up nature of the hospitals meant the land is urban in character, and as it is surrounded by development to the east and south. As such it was deemed not to meet any PPG2 purposes.

4.4 The 2016 study (LBR2.41) found that the site did not meet any NPPF tests. Paragraph 3.17.3 of this study sets out that it “does not prevent sprawl nor does it prevent the merging of local centres as it is surrounded by development at all sides. Furthermore, its physical and visual connection to GB14 and the wider Green Belt is weak due to the presence of the A12 and the urbanised nature of the hospital site. In that regard it does not safeguard the countryside from encroachment”.

4.5 The 2017 addendum (LBR2.41.1) also set out that the site does not meet any NPPF tests. As set out in paragraphs 3.17.4 -3.17.7 of that document:

- “the parcel does not represent countryside and its retention within the Green Belt does not fulfil the NPPF Green Belt purpose to assist in safeguarding the countryside from encroachment”;

- it “does not prevent sprawl nor does it prevent the merging of settlements as it is surrounded by development at all sides which comprise the same settlement of Ilford/ Newbury Park/ Aldborough Hatch/ Seven Kings/ Little Heath”; and
- “as the parcel is surrounded by development on all sides the parcel does not fulfil the NPPF purpose to check the unrestricted sprawl of large built-up areas”.

4.6 Finally, as explained in response to Inspector question 6(v), the 2017 Green Belt Addendum (LBR2.41.1), sets out that the following Green Belt tests do not apply to any Green Belt parcels in Redbridge:

- “to preserve the setting and special character of historic towns;
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land”.

4.7 In addition, it is noted that whilst some limited stream side vegetation exists to the west of the site, this is not contiguous with wider countryside, and as such, the site does not assist in safeguarding the countryside from encroachment.

4.8 The ultimate conclusion of the Green Belt assessments is therefore that the site does not meet any Green Belt tests.

The Ford Sports Ground

4.9 All assessments of the site considered it as part of a wider parcel including King George and Goodmayes Hospitals, and reached consistent conclusions.

4.10 The 2010 assessment noted that as a consequence of the urbanised nature of King George and Goodmayes Hospitals, and surrounding development, the remainder of the site (i.e. Ford Sports Ground) is “considered isolated and not part of the wider Green Belt”

4.11 The 2016 review (LBR2.41) reaffirmed this, stating at paragraph 3.17.3 that “if the hospital was released the remainder of the Green Belt land to the west would be isolated from GB14 and therefore any recommendation must be inclusive of the site as a whole.” Finally the 2017 Addendum (LBR2.41.1) also concluded that the site does not fulfil any Green Belt purposes, as it is surrounded by development and isolated from wider Green Belt proposed for retention.

- 4.12 In addition, it is noted that whilst some limited stream side vegetation exists to the east of the site, this is not contiguous with wider countryside, and as such, the site does not assist in safeguarding the countryside from encroachment
- 4.13 The ultimate conclusion of all Green Belt assessments is therefore that the site does not meet any Green Belt tests.

Land South of Billet Road

- 4.14 Land South of Billet Road was initially assessed as part of the wider parcel of Fairlop Plain in 2010 (parcel GB14). As part of this wider parcel, the assessment found the site to meet PPG2 purposes, noting that whilst there were some barriers, the site was “visually connected to Fairlop Plain” and “not disconnected by barriers of significance enough to lead to Green Belt release”.
- 4.15 Part of Billet Road (labelled as Site E on map ST14935-002 in LBR2.41.2) was then assessed in 2013 in response to representations on the Local Plan advocating its release from Green Belt. The results of this in-house assessment are provided in Appendix 2 of the 2016 Green Belt Review (LBR2.41b). This concluded that whilst the site is enclosed by development to the east, southern and western boundaries link up to wider retained Green Belt, and development on Billet Road was not, as a matter of judgment, considered to be of such a significant scale that it separates the site from wider Green Belt to the north. The site was also determined to prevent urban sprawl by preventing the merging of development in Barking and Dagenham, with settlements in Redbridge.
- 4.16 Assessment of a wider parcel (labelled as Site 3 on map ST14935-003 in LBR2.41.2) advocated for release through further Local Plan representations was then conducted in-house in 2015. The findings are presented in Appendix 3 of the 2016 Green Belt Review (LBR2.41c). This reached the same conclusion as the earlier 2013 assessment of the smaller site, again on the basis that it was judged that existing development along Billet Road not being of sufficient scale to separate it from wider Green Belt to the north, but also interpreting the site as being linked to Green Belt to the south and west.
- 4.17 The Council commissioned the 2016 Green Belt Assessment (LBR2.41). This assessment was carried out by Wardell Armstrong as opposed to being carried out in-house, and reached different conclusions in interpreting the land south of Billet Road against national Green Belt tests. As set out in paragraph 5.4.3 of LBR2.41:

- “the site does not prevent urban sprawl as it is surrounded by housing development especially to the east and beyond the A12 to the south”;
- “it does not prevent the merging of local centres as the local centres of Redbridge and Barking and Dagenham have existing physical and visual coalescence to the south east of the site”; and
- “the site is physically isolated from the remainder of GB14 due to the presence of development located along the majority of Billet Road. In that regard the site does not safeguard the countryside from encroachment.”

4.18 The 2017 Addendum (LBR2.41.1) reviewed the conclusions in the 2016 Green Belt Assessment and reached the same conclusions in respect of the Billet Road site, in addition noting at paragraph 3.15.12 that the site “does not prevent the merging of settlements as the settlement of Ilford/ Redbridge / Little Heath/ Chadwell Heath have existing physical and visual coalescence to the south and east of the site.” Furthermore, retained Green Belt to the north and west of Billet Road (i.e. parcel GB14) prevent the merging of Little Heath with Hainault and Barkingside.

4.19 The Council is therefore satisfied that the Billet Road site does not fulfil national Green Belt purposes and therefore the land can be released from the Green Belt without harming the functioning and purposes of the Green Belt.

v) Has there been any material change in circumstances since the original designation of the Green Belt?

5.1 Yes. Current levels of population growth represent a material change in circumstances from when London’s Green Belt was first designated in 1955 and expanded through the 1950s and 1960s.

5.2 When the Green Belt was first designated, London’s population was in steady decline from its previous 1939 peak – a trend to that continued until the early 1990s (Population Growth in London, 1939-2015, GLA – document CED112). There was therefore less pressure to provide land within London to meet its housing and development needs.

5.3 Since the 1990s, London’s population has continued to grow. Based on latest population projections, the North East London SHMA (LBR2.01), and subsequent SHMA update (CED003), identify far higher levels of housing need in Redbridge than has historically been the case; and almost double the minimum requirements set out in the London Plan. This, combined with the resultant need for supporting infrastructure, represents a

material change in circumstances from when the Green Belt was first designated.

5.4 Through the preparation of the Local Plan, the Council has considered all brownfield sites with reasonable prospects of development, and concluded that it is not possible to meet its development needs in a sustainable manner without encroaching onto the Green Belt.

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 quantity and quality in a suitable location?

6.1 The Council has identified the potential to reprovide the existing level of sports provision currently located on the Ford Sports Ground to the Goodmayes Park Extension. Proposals set out in Pitch Relocation and Improvement Feasibility Report (LBR 2.44.6) demonstrate how the sports provision at Ford Sports Ground could be replaced by equivalent or better provision in terms of quantity and quality at the Goodmayes Park Extension. This document sets out the works required to reinstate the provision currently at the Fords Sports Ground along with the likely works required to ensure such facilities can be sustainably managed at the same quality level. Proposed pitch sizes and orientation will meet FA, ECB and Sport England guidelines.

6.2 LBR 2.44.6 demonstrates that the provision of equivalent or better replacement sports provision in respect to pitch numbers, quality and carrying capacity at the Ford site can be re-provided at Goodmayes Park Extension.

6.3 The report sets out two options which could be feasible. Option 1 sets out how equivalent or better replacement could be achieved in terms of number of pitches and quality. Option 2 replaces one of the natural adult pitches with a full-size 3G synthetic pitch. In relation to football, the provision of one full-sized 3G pitch in place of one full size adult pitch will significantly increase the provision for all types of football (above the current provision on Ford Sports Ground) due to the additional carrying capacity, providing up to a maximum of 50 hours extra use.

6.4 The maximum number of games per week that both options will allow, whilst maintaining quality, is summarised in Table 5 (page 16). Option 1 will replicate a similar capacity of games per week as is currently provided on the Ford Sports Ground. However, option 2, with the inclusion of the full-size 3G synthetic pitch (where a maximum of 52 adult games per week of football could be accommodated), would allow a maximum

betterment of 24 games based on that which is currently provided at the Fords Sports Ground. In turn, this would allow for a significant increase in youth and junior football to be played by dividing an adult pitch into smaller junior sized pitches.

- 6.5 The provision for cricket can be provided to an equivalent or better standard in terms of quantity and quality as long as the squares are constructed to a high standard and maintained to a high standard (as proposed). However, it is also noted that the provision of two additional NTP's will add further capacity to support informal cricket, midweek cricket and single wicket competitions on the site.
- 6.6 Proposals also include the provision of a new/improved sports pavilion/changing facility and car parking.
- 6.7 The works proposed in paragraphs 6.2 – 6.4 would enable the same quality of pitches to be re-provided as are currently located on the Fords Sport Ground.
- 6.8 Goodmayes Park Extension is considered to be a suitable location as it is in close proximity to the existing Ford Sports Ground (2.61 km away) meaning minimal disruption from users displaced from the site. The site is also accessible from Goodmayes Station (1.2 km) (indeed closer to Goodmayes Station than the Ford Sports Ground) and is well connected to other bus services. The site would be deliverable as it is in Council ownership and management.
- 6.9 It should also be noted that within the Green Belt Conceptual Masterplan (LBR2.78) provision has been included provision for the inclusion of the retention of on the site for open space/sports pitches on the existing Ford Sports Ground. There is sufficient space to retain one cricket pitch and two adult football pitches within the area allocated for development. This is likely to be related to the proposed education use on the site. This sports provision will be subject to a community use agreement which will ensure local residents can use and access the facilities.
- 6.10 The Ford Sports Ground site has been phased for the final part of the Local Plan period (2025 – 2030) to enable firm proposals to be developed and enable sufficient time for a coordinated relocation. The overall gain from the proposals set out in LBR 2.22.6 and the retention of sports provision at the existing Ford Sports Ground site as set in LBR 2.78 demonstrate the Council's commitment to meeting the requirements of NPPF paragraph 74. The grampian terms of policies LP1 B – Ford Sports Ground and LP35 - Protecting and Enhancing Open Space ensure the requirement to reprovide equivalent or better sports provision is imbedded within the Local Plan and development of Ford Sports Ground should not

happen until this has been achieved at an alternative site. Also note Modification 1.02 (part 1) - Map 2 - Safeguarding for potential re-provision of sports.

vii) How will the cost of re-provision and future maintenance be funded?

- 7.1 The Council expects that the costs of re-providing the playing pitches would be met by any developer seeking to bring the site forward for development and will be secured by way of a s106 obligation or Grampian condition. The Local Plan Viability Study (CED 111) paragraph 4.26 included an indicative cost for the re-provision of pitches and facilities. In general terms this additional cost did not compromise the viability or delivery of the Ford Sports Ground. The Local Plan includes specific policies (LP1 B and LP 35) to secure this re-provision and the failure of any developer to undertake this would be grounds for refusal of any application.
- 7.2 The liability for any future maintenance costs would depend on the ultimate ownership of the playing pitches and any leasing or license arrangements put in place. Given the Ford Sports ground is in private ownership, the liability for meeting these costs would fall to the land owners. It is likely that a commuted sum would also be sought from the developer(s) of the existing pitches to support the maintenance costs.
- 7.3 The Council currently owns and manages Goodmayes Park Extension. There is also the potential for the Council to consider leasing or licensing the pitches to sports clubs who would then take on responsibility for their management and maintenance. It is considered that these are matters of detailed management which are capable of being resolved through the Masterplanning and development control processes.

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

- 8.1 As noted in question iv above, as set out in LBR 2.22.6, there is the potential to re-provide the sports provision existing at Ford Sports Ground with equivalent or better at Goodmayes Park Extension.
- 8.2 Currently no formal sports use exists on Goodmayes Park Extension. No football or cricket pitches (adult or youth) are marked out on the site. No formal cricket use has occurred on the site since approximately 2005, whilst football was last played in 2012/13 season, when only one pitch was hired. Given the above, the Council do not consider it correct to

categorise the plan as seeking to replace an existing sports facility with another one, but rather the plan is relocating sports provision to an alternative site which is not currently in use for sport or recreation and where equivalent or better sports provision can be provided. The Council considers that the relocation of sports provision from Ford Sports Ground to Goodmayes Park Extension will enable a more efficient and effective use of land for sport and recreation purposes, investing in new facilities/pitches at the site and encouraging more people to access this open space.

ix) How will the transition between existing and new facilities be controlled and managed?

9.1 The transition between the facilities would be managed through the planning process with a phasing plan likely to be specifically conditioned which would need to demonstrate that the new facilities were at the required standard and available for use prior to the loss of the existing facilities.

9.2 The Council currently owns and manages the Goodmayes Park Extension which will facilitate transition and delivery.

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

10.1 Yes, schools are required on each of the allocated strategic sites within the Crossrail Corridor.

10.2 The Infrastructure Delivery Plan (2017) (LBR 2.21) identifies the education infrastructure required to support planned growth sustainably, effectively and at the right time in Redbridge.

10.3 The Infrastructure Delivery Plan highlights that even with the planned expansions of existing schools to meet projected demand during Phase 1 of the Local Plan and the temporary provision of additional classes, the Council's Education Department has advised that the most recent projections undertaken suggest that there will likely to be requirement for a further 10 primary school forms of entry – equivalent to 2,100 primary school places and 47 secondary forms of entry – equivalent to 9,870 secondary school places over the life of the plan. The actual number of new schools required will vary depending on the quantum of places delivered through expansions (although opportunities for this are diminishing) and/or the size of schools delivered. Applying the average size of four FE for primary schools and eight for secondary suggests a need for the equivalent of three further primary schools and six secondary schools.

10.4 In response to this level of demand, the Local Plan provides a framework for the delivery of schools to meet demand arising from the growth in housing projected in the plan. In particular, major comprehensive mixed use development of key development opportunity sites including education infrastructure is essential to meet this demand. The IDP identifies the need for each of the three strategic green belt sites of King George and Goodmayes Hospital, the Ford Sports Ground and land at Billet Road to accommodate new secondary school provision, ensuring that infrastructure provision is aligned with demand. This reflects the position in the Cabinet Report (October 2016) on Pupil Place Projections which identified the limited capacity for expansion on existing sites and the need to identify new sites to support future demand.

xi) Is the expectation of a decentralised energy network at King George and Goodmayes Hospitals justified?

11.1 The NPPF sets out, at paragraph 97, that local planning authorities should “have a positive strategy to promote energy from renewable and low carbon sources”. Furthermore, the London Plan sets out in Policy 5.5 an expectation that 25% of heat and power used in London be generated through the use of localised decentralised energy systems by 2025, and that boroughs should “identify decentralised energy network opportunities”.

11.2 King George and Goodmayes Hospitals have been identified through the GLA’s Decentralised Energy Masterplanning (DeMAP) programme, which was developed by the LDA/ GLA to help meet the Mayor of London’s target of providing 25% of London’s energy supply from decentralised sources by 2025 (i.e. London Plan Policy 5.5).

11.3 As part of the programme, the Council undertook a ‘heat mapping’ exercise in 2010 to identify areas of the borough with a high heat demand that may be suitable for decentralised energy networks. Subsequently, the Council commissioned consultants to carry out the London Borough of Redbridge Decentralised Energy Masterplanning Study 2012 (CED102) to provide further analysis of the opportunities within the borough.

11.4 This study identified the site at King George and Goodmayes as one of the most suitable areas in the borough for a Decentralised Energy Network. In light of this evidence, and higher level policy requirements, the expectation for a decentralised energy network as part of the development of the site is justified.

11.5 It is recognised that such provision will come at a financial cost to the developer, which cannot be quantified until precise scheme details are known. For this reason modification number 20 in LBR1.01.2 sets out that the requirement is subject to viability, which is supported by the sites landowners. Nevertheless, it is worth noting that any such provision can make a contribution to meeting the carbon reduction targets required under Policy 5.2 of the London Plan.