

REDBRIDGE LOCAL PLAN 2015- 2030 EXAMINATION IN PUBLIC

Bancroft's School Written Statement

Issue 5: Housing Growth and Affordable Housing

Issue 6: Green Belt

Representor Number: R01079

12 May 2017

CONTENTS

1.0 Introduction 2

2.0 Issues and Questions 3

3.0 Conclusions 7

APPENDICES

APPENDIX A.....9

1.0 Introduction

INTRODUCTION

- 1.1 CBRE Ltd is instructed on behalf of Bancroft's School to submit this written statement in relation to the Redbridge Local Plan 2015-2030 Examination in Public. This statement should be read in conjunction with the representation submitted to the Regulation 19 consultation, the Pre-Submission draft Plan in September 2016 (attached at Appendix A for reference). Bancroft's School wish to exercise the right under section 20(6) of the 2005 Act to make further representations, although they do not wish to appear in front of the Inspector at the hearing session being held for these issues on 7 June 2017.
- 1.2 There has been some confusion regarding the reference to the site which has been clarified with the Inspector. The site which has been promoted by the school is known as West Grove Sports Ground and is located south of Bancroft Rugby Football Club and Whitbread's Sports Ground. This has been recently confirmed to the Inspector and a site plan is enclosed with the representations submitted to the Regulation 19 consultation.
- 1.3 Given the intrinsic nature of the issues, the school's response to questions raised in relation to Issue 5: Are the policies for housing growth and affordable Housing (Policies LP2 and LP3) justified, deliverable and consistent with national policy?, and Issue 6: Are there exceptional circumstances that warrant altering Green Belt boundaries?, are dealt with in this Statement.
- 1.4 This Statement deals with the relevant questions within each topic area that are considered relevant to Bancroft's School and considers the additional and updated evidence which has been published since the Regulation 19 consultation.
- 1.5 This Statement does not consider the nature of the site or the reasons for its release from the Green Belt. These were set out in previous representations to the Local Plan by the School, although comments have been made in relation to further and updated evidence base submitted by LB Redbridge.

Word Count: 2,272

2.0 Issues and Questions

- 2.1 In relation to Issue 5, the pertinent matters relating to Bancroft's School are dealt with in the following questions:
- Is the minimum housing target of 16,845 justified having regard to the aim on the London Plan to 'close the gap' to objectively assessed need and the expectation in Table 3 (as modified) (LBR1.01.3) that 18,936 dwellings will be delivered during the plan period?
 - Are the sites relied upon for the supply of housing deliverable and developable in accordance with paragraph 47 of the NPPF?
- 2.2 In relation to Issue 6, the following questions are relevant:
- Having regard to the NPPF, the housing targets in The London Plan, the policy approach of supporting growth without encroaching on the Green Belt, the identification of Green Belt in the London SHLAA as a policy constraint (paragraph 2.40 of LBR 2.05) and the objectively assessed need for housing in the Borough should Green Belt sites be released for development as a matter of principle?
 - Are there any sites where land has been included in the Green Belt which it is unnecessary to keep permanently open?

ISSUE 5 – HOUSING GROWTH AND AFFORDABLE HOUSING

Question 3: Is the minimum housing target of 16,845 justified having regard to the aim on the London Plan to 'close the gap' to objectively assessed need and the expectation in Table 3 (as modified) (LBR1.01.3) that 18,936 dwellings will be delivered during the plan period?

- 2.3 For the reasons set out at Regulation 19, the Plan in its current form is not sound based on providing a minimum housing target of 16,845. Since the last consultation whilst the Council's anticipated housing delivery has increased from 18,774 new homes to 18,936 new homes, and this is above the London Plan target, the objectively assessed housing need of 34,296 homes (SHMA Update April 2017) is far in excess of the identified sources of housing supply. It is considered the housing target is not justified with the aim within the London Plan to 'close the gap' to objectively assessed need.
- 2.4 The London SHLAA 2013 (LRB 2.05) indicates that Redbridge is amongst the worst performing boroughs in identifying capacity to meeting DCLG household projection figures. The significant shortfall arises from outer London Boroughs. Accordingly, the SHLAA then acknowledges the flawed approach that can result from the SRQ matrix, specifically that it "reinforces low density development in areas which are currently low density", and concludes that therefore "even outer London areas have to encourage higher density development to meet their pressing housing needs."¹ It therefore questions whether densities on brownfield sites could be increased further and whether alternative sites should to be identified for release.
- 2.5 As detailed in previous representations, there is a current shortfall in housing delivery. Within the last monitoring (December 2014) only 204 new homes were delivered against the target of 760. With the London Plan review later this year it is likely that the housing targets for boroughs could increase further and therefore the current Local Plan review

¹ London SHLAA 2013 (LRB 2.05), paragraph 3.84.

2.0 Issues and Questions

should look to maximise opportunities for housing whilst balance other land use requirements, provision of services and infrastructure, and land constraints.

- 2.6 Whilst the purpose of the Examination is not to review the soundness of alternative sites that have not been included by the Council through their review and in the evidence base process, there are existing brownfield sites that could be further intensified and alternative Green Belt options that could be considered.

Question 9: Are the sites relied upon for the supply of housing deliverable and developable in accordance with paragraph 47 of the NPPF?

- 2.7 Paragraph 47 of the NPPF outlines that local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing, with an additional buffer of 5% or 20% depending on recent past housing delivery. For sites that have been identified for development in the medium (6-10 years) to long term (11-15 years) the sites should be, "in a suitable location for housing development and there should be reasonable prospect that the site is available and could viable developed at the point envisaged".
- 2.8 In regards to Green Belt, the Government's White Paper supports the NPPF which outlines that 'exceptional circumstances' should exist to allow land to be released from the Green Belt. It is clear given the land available and constraints on existing brownfield land that Green Belt land will need to be released in order for the borough to deliver its housing targets and other development needs.
- 2.9 As set out in previous representations there are some uncertainties regarding the sites put forward by LB Redbridge to deliver their housing requirements in the latest stages of the Plan. None of the sites GB13b, GB14c and GB16 which have a total identified delivery of 2,765 units, just over 14% of the overall housing provision, have planning permission and therefore there are uncertainties regarding capacities and timescales identified. These sites consist of:
- Site 133 – Oakfield, Forest Road, Barkingside (Hainault Fields) (GB13b) with an indicative capacity of 614 to come forward in Phase 3 (2026-2030)
 - Site 97 - Land at Billet Road and surrounding area (GB14c) with an indicative capacity of 800 to come forward in two phases:
 - 400 units to be delivered in Phase 2 (2021-2025)
 - 400 units to be delivered in Phase 3 (2026-2030)
 - Site 67 - King George and Goodmayes Hospital (GB16) with an indicative capacity of 500 to come forward in Phase 2 (2021-2025)
 - Site 68 – The Ford Sports Grounds with an indicative capacity of 600 to come forward in two phases:
 - 300 units to be delivered in Phase 2 (2021-2025)
 - 551 units to be delivered in Phase 3 (2026-2030)
- 2.10 With uncertainty regarding sites of these scale not coming forward, or not delivering their total identified capacity, it will put further pressure on windfall sites. We note that there has been a modification proposed to policy LP2 that supports the direction of the Housing White Paper which encourages the development on small windfall sites. The annual windfall allowance of 270 homes (as per the London SHLAA) has been attributed to the final 10

2.0 Issues and Questions

years of the plan so they will deliver 2,700 homes during this period from windfall sites. It should be noted that this identified amount is more units delivered in the whole AMR review period and there is acknowledgement in the SHLAA 2013 (LBR 2.05) that dependence on windfall capacity should be minimised. There will be greater pressure for these sites to contribute to the annual delivery should the sites identified in the first five years not come forward or achieve the capacity, and therefore alternative sites and options should be considered.

- 2.11 For the reasons set out above and as detailed in the Statement for Issue 6, the site (part of GB08) being promoted by Bancroft's School should be considered for release from the Green Belt as part of this Local Plan Review and which contribute to the Council's delivery of housing in the short to medium term.

ISSUE 6 – GREEN BELT

Question 1: Having regard to the NPPF, the housing targets in The London Plan, the policy approach of supporting growth without encroaching on the Green Belt, the identification of Green Belt in the London SHLAA as a policy constraint (paragraph 2.40 of LBR 2.05) and the objectively assessed need for housing in the Borough should Green Belt sites be released for development as a matter of principle?

- 2.12 The Pre-Submission Draft Plan recognises that the London Borough of Redbridge (LB Redbridge) cannot meet the objectively assessed need of 34,296 homes dwellings. The Housing White Paper continues to support the principles of the NPPF which states that Green Belt boundaries should only be amended in exceptional circumstances where local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements.
- 2.13 The Options report provided by the Council demonstrates that even with increasing the density of opportunity areas and brownfield sites, and through exploring opportunities whether other authorities can help to meet some of the identified development requirement, LB Redbridge will need to release Green Belt sites to deliver their housing requirements.
- 2.14 We therefore agree with the approach that has been taken by the authority and land in the Green Belt should be released in order for the Council to meet their future development needs.

Question 8: Are there any sites where land has been included in the Green Belt which it is unnecessary to keep permanently open?

- 2.15 As set out in the NPPF, "the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open(...)" (paragraph 79). Green Belt Review 2016 (LBR 2.41) concluded that the land currently in ownership by Bancroft's does stop the unrestricted sprawl of large built-up areas and assists in safeguarding the countryside from encroachment. In the addendum report (LBR 2.41.1) similar conclusions are drawn that the parcel as a whole fulfils the requirements of Green Belt. In relation to the site it is concluded that the parcel remain in the Green Belt and it is not sub-divided. Through previous representations we have demonstrated that the land which forms part of a wider parcel GB08 (Ray Park) could be considered for release from the Green Belt without impacting on the overall openness of the Green Belt.

2.0 Issues and Questions

- 2.16 The Addendum Green Belt Review sets out given the generally urbanised nature of Redbridge that 'countryside' comprises small areas, and land uses including sports pitches/amenity grassland areas, where they are contiguous or connected to more conventional countryside, can be considered as 'countryside'.
- 2.17 The site, however, could come forward for redevelopment without comprising the principles of the Green Belt for the remaining land within parcel GB08 which connects to 'countryside'. As detailed in previous representations, the land is currently used by Bancroft's School and is not open for general public use. The provision of the sporting facilities would be re-provided in enhanced facilities on existing sites owned by the school. The remaining land within GB08 would still fulfil the purpose of Green Belt, "to assist in safeguarding the countryside from encroachment".

3.0 Conclusions

- 3.1 In conclusion we would like to bring to the attention the following concerns with the above Issues:
- There are uncertainties regarding the deliverability of some of the opportunity sites identified in Appendix 1 which could put further pressure on windfall sites coming forward in order to deliver the Council's housing targets.
 - There are alternative smaller sites which should be released from the Green Belt that are more sustainable.
 - The site can be considered for release from the Green Belt and would be able to contribute to the Borough's housing need in the short to medium term. Whilst the site has been considered in the updated evidence base (February 2017) that it should remain in the Green Belt, it could be released without harming the functions of the remainder of the parcel of GB08 as the northern part of this parcel will still be connected to countryside. In previous representations, we have set out the reasons for how the site does not meet the function of what it is designated for, and how the site would be deliverable in line with the tests of the NPPF.

APPENDICES

Appendix A

Appendix A

Redbridge Local Plan
Planning and Regeneration Service
London Borough of Redbridge
Freepost RSLR-JACE-HSUG
Ilford
IG1 1DD

28 September 2016

By Email – dpd@redbridge.gov.uk

Dear Sir or Madam

REDBRIDGE LOCAL PLAN – PRE-SUBMISSION DRAFT CONSULTATION - BANCROFT'S REPRESENTATIONS

CBRE Ltd is instructed by Bancroft's School to submit the following representations to the current Pre-Submission Draft consultation of the emerging Redbridge Local Plan.

BACKGROUND

Bancroft's School

Bancroft's School are a key employer and landholder in LB Redbridge. These representations are submitted in relation to one of their existing sports grounds (see enclosed site plan). The school is looking to consolidate and improve some of the existing sporting facilities. The land in question will therefore be surplus to requirements and available for redevelopment. Releasing the land will ultimately raise capital for reinvestment in the school.

The site is located south of Bancroft Rugby Football Club and the Whitbread's Sports Ground. It is bounded to the west and south by residential properties. Beyond the open space to the east is the M11 Motorway.

It is located approximately 0.5 miles from Woodford Underground Station, which forms part of the Central line and 0.5 miles west of Woodford Bridge. Access to the site is provided by Ray Lodge Road, a small residential road which connects to Snakes Lane East, a main road which links to Woodford Underground Station. The site has a PTAL rating of 3 which means it has a 'Moderate' public transport accessibility level.

Discussions with LB Redbridge

Whilst representations have not previously been submitted to the Plan, discussions have been undertaken with the Council regarding the proposals and options to release the site from the Green Belt. A

discussion was held with the Council regarding the opportunity to consolidate and enhance the existing sporting and playing fields provision, and therefore release the site to assist the Council meet some of its short and long term housing requirements.

Development Plan Context

The site is allocated the adopted and emerging Local Plan as Green Belt. Other designations in close proximity to the site which will need to be taken into consideration should development come forward on the site in the future are:

- Immediately west of an area of archaeological interest;
- West of the site is the Grade II listed garden walls at Ray House; and
- West of the site is the locally listed Ray House.

The site sits away from the River Roding and therefore does not sit within a flood risk zone.

In preparing these representations, regard has been paid to the following supporting Evidence Base of the Plan:

- Redbridge Housing Strategy 2014-2019;
- Draft Green Belt Review 2016;
- Draft Open Spaces Assessment 2016; and,
- Redbridge Playing Pitches Strategy 2016.

EMERGING LOCAL PLAN

The emerging Local Plan in its current form is not legally compliant or sound, which is a requirement of National Policy under NPPF paragraph 182. NPPF paragraph 182 sets out the 'soundness test' for which Plans must be prepared. They must be:

- Positively Prepared;
- Justified;
- Effective; and
- Consistent with National Policy.

The Plan is not 'Justified' in so much that there are alternative sites that could be released from the Green Belt to allow the Council to deliver on its objectively assessed housing need.

Delivering Housing Growth and Green Belt Release

The Housing Strategy Report details the current picture:

- LB Redbridge is the 3rd most under-supplied Borough in London and the 6th highest area of projected household growth to 2021 in London.
- There has been a decline in the supply of affordable housing. Since 2008/2009, 667 affordable homes have been delivered, a 49% reduction from supply in the previous 5 years.

- The Strategic Housing Market Assessment identified a requirement of 9,230 (3,895 social rent, 5,335 intermediate) units between 2010 and 2015. However, new supply since 2010/2011 has only met 3% (281) of the requirement.

Emerging Policy LP2 (Delivering Housing Growth) outlines the Council's minimum target for 2015-2030 is 16,845 new dwellings. This is based on the minimum housing target of 1,123 dwellings from the London Plan, the additional 20% buffer and also including the shortfall of 2,004 homes between 2010-2015. The objectively assessed housing need has been identified as 31,977 homes which equates to an average of 2,123 units per year, almost double the target which is set in the London Plan. The potential housing sites that have been identified through the SHLAA, plus additional sites identified by the Council has established that the borough can accommodate up to 18,774 new homes. The objectively assessed housing need is far in excess of the identified sources of housing capacity, although the Council consider the proposed strategy as the most sustainable approach.

The latest AMR (December 2014) outlines the detail of the shortfall in housing delivery the Council. In the last monitoring period, only 204 new homes were delivered against the target of 760. The report comments that, "there continue to be problems with housing delivery in the Borough. It was the lowest level of completion since the monitoring of housing delivery through the AMR (2003/2004)". With this target increased further, it shows the need for the Council to identify sites to come forward to meet the challenging targets within the Plan period.

Whilst some of the requirement will be delivered on Investment Areas (Ilford Town Centre, Gants Hill, Crossrail Corridor, South Woodford and Barkingside) and brownfield derelict land, it is acknowledged that the Green Belt boundaries do need to be reviewed to release sites for development. The Council previously consulted on the Alternative Development Strategies document which looked at alternative options for the release of land instead of the current proposals for Oakfields Playing Fields. This document outlined that, "even with the inclusion of Oakfields (or an alternative/s) the Council will not be able to identify sufficient housing land to provide for full need, but including Oakfields (or an alternative/s) will add significantly to capacity and help demonstrate that the Council is doing everything it can to meet demand". The Council have undertaken a review of the existing Green Belt and identified a number of strategic sites ('Opportunity Sites') to be released. These include:

- Hainault Fields (GB13b) with an indicative capacity of 614 to come forward in Phase 3 (2026-2030)
- Land at Billet Road and surrounding area (GB14c) with an indicative capacity of 1109 to come forward in Phase 3 (2026-2030)
- King George and Goodmayes Hospital (GB16b) with an indicative capacity of 500 to come forward in Phase 1 (2015-2020)

None of the above sites have planning permissions or applications submitted and therefore there are uncertainties about the delivery of these sites for the capacities and timescales identified. Not achieving the targets identified for these sites will only add further pressure on windfall sites to deliver the Council's need.

Emerging Policy LP34 (Managing and Protecting the Borough's Green Belt and Metropolitan Land) refers to the management and protection of the Green Belt and Metropolitan Land, with purposes including the prevention of the merging of Woodford Green and Woodford Bridge. The policy outlines that the Council will protect the openness with resisting new development which is considered as inappropriate in accordance with the NPPF and will support development such as outdoor sport and recreation to improve access to Green Belt areas where there is no conflict with protecting the openness of the land.

We are aware of the Green Belt Review (2016) (update on the 2010 report) which has been undertaken by the Council in relation to the emerging Local Plan. The report split the Green Belt of the District into sixteen parcels, with the site forming part of a wider designation of land (GB08 Ray Park and surrounding playing fields). It concludes the land does stop the unrestricted sprawl of large built-up areas and assists in safeguarding the countryside from encroachment. The report recommends that the site should not be released from the Green Belt and against its sub-division. However, we would seek the Council to review this recommendation in line with the impact that releasing this parcel will have against other parcels of land which have been earmarked for release in the Plan. The Green Belt review did not consider the release of smaller sites within the sixteen main parcels of land. Paragraph 80 of the NPPF outlines that the five purposes of Green Belt:

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

In relation to the above criteria, the site does not fall into categories 1, 2, 3 and arguable not 4, therefore the site does not meet the function of what it is designated for.

Paragraph 6.1.8 of the Plan details the areas of Green Belt in the District which did meet the Green Belt requirements. The site (part of GB08) was not identified in this list. It was also not identified in the Alternative Development Strategies report; however, it would be deliverable in line with the tests of the NPPF. It is:

- Available – the school plans to reallocate and improve the existing sporting facilities on nearby sites, thereby releasing the site for redevelopment.
- Suitable location for development – it is in a sustainable location located near to public transport and facilities. It is also bounded on two sides by residential properties.
- Achievable – housing could be delivered on the site within five years.
- Viable – the site would be delivered by a housing developer.

By releasing the site from the Green Belt for housing, it will take some pressure off the delivery of the quantities identified for strategic sites and also the reliance on windfall sites. From 2020, the Council have identified that 270 units per year will come from windfall sites. This is more than what was delivered in the whole period of the last AMR review period.

Very special circumstances would justify the release of the site from the Green Belt. The capital generated from the sale would be reinvested back into Bancroft's School for its ongoing upkeep, improvements and future expansion of facilities. There would be no net loss of playing fields or facilities as these will be redistributed, and the development would not undermine the communities open space assets. Opportunities for wildlife creation and accessible open space as part of any redevelopment could be considered. Given the current housing targets for the Borough releasing the site from the Green Belt for residential development is logical.

Open Space

It is acknowledged that the increased housing growth will have an added pressure on the Borough's open space resource. The site does not sit within an area of open space deficiency. The Playing Pitches Strategy (June 2016) outlines the Bancroft's Schools Sports Ground does not offer certain sports and it is not available for community use. Whilst the report "identifies a need, based on its analysis to retain all current existing playing field provision", the report does outline the difference that the school sports grounds contribute to this need. The school can demonstrate that the facilities can be provided elsewhere. Allowing them to do so will also enable the school to reinvest and enhance the facilities for future generations.

Furthermore, the site is not protected by Emerging Policy LP35 (Protecting and Enhancing Open Spaces) which seeks to protect and enhance open spaces, where identified as open space and play space on the policies map. The re-provision and enhancement of existing facilities through its release will be supported by the policy, which states that multifunctional and shared use of existing open space including school and private facilities will be promoted. The policy outlines that "inappropriate development will be resisted unless the proposal is supportive of an ancillary to the purpose of that open space and the proposal is to enhance the quality or accessibility of the open space". It should be noted that both Oakfield Playing Fields and the Ford Sports Ground identified for 600 and 850 new homes respectively would result in loss of open space provision and facilities for sports from 2215ha to 2174ha. Given the Bancroft's site was not included in the Open Space Study, the loss of the site would not impact on the current and future open space requirements. Nevertheless, the facilities will be provided elsewhere within the schools landholdings so that there is no impact on the offer and opportunities for children.

SUMMARY

In summary, we do not consider the Plan as currently drafted to be sound in so much that there are alternative smaller sites which should be released from the Green Belt that are more sustainable, and would assist the Council in meeting its challenging housing targets. We have demonstrated that the site does not meet the requirements of what Green Belt land should be designated for. By releasing the site from the Green Belt it would contribute to the Council's overall housing requirement and also release necessary capital for reinvestment back into a locally important school. There would also be no impact on the open space provision, the site has a different offer than other areas of open space and it has not been identified for protection under Emerging Policy LP35.

We hope the above representations are helpful and would welcome further dialogue with the Council to discuss the site and their development potential, and how it could become part of the solution for Redbridge. We request to remain informed of the Local Plan's progression. Should you have any queries or would like to discuss the representations and the site in further detail, please do not hesitate to contact me or my colleague Hannah Blunstone [REDACTED]

Yours sincerely

[REDACTED]

JONATHAN STODDART
SENIOR DIRECTOR

cc. Mr L Green – Bancroft's School

Bancroft's School - Site Boundary

