LOCAL GOVERNMENT BOUNDARY COMMISSION FOR ENGLAND

REVIEW OF GREATER LONDON, THE LONDON BOROUGHS AND THE CITY OF LONDON

LONDON BOROUGH OF REDBRIDGE

Boundaries with: WALTHAM FOREST LB and EPPING FOREST DISTRICT in ESSEX

REPORT NO. 648
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BOUNDARY COMMISSION
FOR ENGLAND
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1. This report contains our final proposals for the London Borough of Redbridge's boundaries with the London Borough of Waltham Forest and the District of Epping Forest, in Essex. We are making the major proposal that Buckhurst Hill and Grange Hill be brought within Greater London; and we are recommending that two residential areas, together with the western section of Wanstead Flats, should be transferred from Waltham Forest to Redbridge. We are also making a series of more minor proposals to remove anomalies, for example, where properties are divided by local authority boundaries. Our report explains how we arrived at our proposals.

2. On 1 April 1987 we announced the start of a review of Greater London, the London boroughs and the City of London as part of the programme of reviews we are required to undertake by virtue of section 48(1) of the Local Government Act 1972. We wrote to each of the local authorities concerned.

3. Copies of our letter were sent to the adjoining London boroughs; the appropriate county, district and parish councils bordering Greater London; the local authority associations; Members of Parliament with constituency interests; and the headquarters of the main political parties. In addition, copies were sent to the Metropolitan Police and to those government departments, regional health authorities, electricity, gas and water undertakings which might have an interest, as well as to
local television and radio stations serving the Greater London area, and to a number of other interested persons and organisations.

4. The London boroughs and the City of London were requested to assist us in publicising the start of the review by inserting a notice for two successive weeks in local newspapers so as to give a wide coverage in the areas concerned.

5. A period of seven months from the date of our letter was allowed for all local authorities and any person or body interested in the review to send us their views on whether changes to the boundaries of Greater London authorities were desirable and, if so, what those changes should be and how they would serve the interests of effective and convenient local government, the criterion laid down in the 1972 Act.

OUR APPROACH TO THE REVIEW OF GREATER LONDON

General

6. As with our previous London borough reports, we have thought it appropriate to commence with some relevant general considerations on the Review of London which have been raised by our examination of this and other London borough areas.

7. We took the opportunity in our Report No 550, "People and Places", to explain in some detail the approach we take to our work and the factors which we take into consideration when conducting reviews, including the guidelines given to us by the Secretary of State (set out in Department of the Environment Circular 20/86 in the case of the reviews of London).

8. Subsequently, in July 1988, we issued a press notice, copies of which were sent to London boroughs, explaining the manner in which we proposed to conduct the review of London boundaries. In the notice we said that, from the evidence seen so far, this was unlikely to be the right time to advocate comprehensive change in the pattern of London government - although the notice listed a number of submissions for major changes to particular
boundaries which had been made to the Commission, some of which the Commission had itself foreseen in "People and Places". These and other major changes to particular boundaries are being considered by the Commission as part of its Review.

Wider London Issues

9. Our review of the London boroughs and the City of London is the first such review to have been undertaken since the creation of the present London boroughs in 1965, under the provisions of the London Government Act 1963. Although our view remains that this review is not the right occasion for a fundamental reappraisal of the extent of London or the pattern of London boroughs, which would inevitably raise questions about the nature and structure of London government, we do see it as very much part of our role to identify and record any general issues which arise and which may need to be considered in any more fundamental review of London in the future.

The outer boundary of London

10. In his guidelines, the Secretary of State said that special care would be required in considering changes to the outer boundary of Greater London, because the distribution of functions is different within and without that boundary. The Commission's press notice also referred to the particular problems presented by the outer London boundary, which does not always follow the edge of the built-up area and where the relevance of the M25 and the Green Belt would need to be considered. We have borne in mind the need to find, if possible, a clear boundary for outer London which will not be rapidly overlaid by development. On the other hand, where continuous development already spills over the outer London boundary, we may not necessarily seek to extend the boundary up to the limit of that development. Indeed, the conurbation of London has in some places already stretched far into the countryside along salients of development. We have to reach a balanced view as to where the boundary should lie, taking account of shape, community ties and the impact of major and new infrastructure, as well as the extent of development.
11. The outer London boundary has proved to be a particularly difficult and contentious issue in the context of this review. Given the recommendations of the Royal Commission on Local Government in Greater London (the Herbert Commission), which in 1963 proposed that the former London County Council's Debden Estate, Loughton, should be brought within Greater London, we have felt it necessary to consider the extent to which the Redbridge/Epping Forest boundary provides a durable and recognisable outer London boundary, taking account of community ties. We have concluded that to bring Loughton within Greater London would raise questions about the future viability of the District of Epping Forest. However, we have made proposals for the transfer of other areas of Epping Forest (Buckhurst Hill and Grange Hill) which appear to look towards, and form part of, the Greater London conurbation.

The M25

12. Early in our deliberations we acknowledged that, with a few exceptions, the M25 encompasses the continuous built up area of London. We took the view that the capital's boundary should not normally extend beyond it. On the other hand, it could not be regarded as a satisfactory boundary for Greater London as a whole, particularly in the south, where it encompasses substantial areas of open countryside, including parts of the North Downs. Nevertheless, there are parts of the M25 which are close to the present outer boundary of London. As we indicated in "People and Places", we recognise the need to consider each one of these stretches to see whether it offers a better boundary for the future, taking into account the effect of the motorway itself on local ties in the vicinity.

London's Green Belt

13. There is a presumption against development in the green belt. Again, as we indicated in "People and Places", fears are often expressed to us that an urban authority will more readily seek to extend its built-up areas into green belt than will a rural authority. We do not accept this as a general premise: once an area of green belt has been defined, its status should
not be affected by a change in the authority in which it lies. Nor is there any reason to suppose that London boroughs are any less able to preserve and maintain green belt than shire districts and counties. There are already significant tracts of green belt within the existing boundaries of Greater London and we have seen no evidence to suggest that they are under any greater threat than green belt land lying immediately beyond the boundaries of the capital. Indeed, policies for the protection and improvement of green belt are advocated in the Department of the Environment's Strategic Planning Guidance for London and will form part of boroughs' Unitary Development Plans. We have therefore taken the approach that, while the relevance of the green belt needs to be taken into account as we look at each section of the outer London boundary, it would be inappropriate to consider excluding green belt land from London solely on the misplaced grounds that London boroughs are unsuitable custodians of it.

THE INITIAL SUBMISSIONS MADE TO US

14. In response to our letter of 1 April 1987, we received submissions from the London Boroughs of Redbridge and Waltham Forest, and from Epping Forest District Council. Responses were also received from 69 interested groups, organisations and members of the public.

OUR DRAFT AND FURTHER DRAFT PROPOSALS AND THE RESPONSES TO THEM

15. In addition to our letter of 1 April 1987, we published two further consultation letters in connection with this review of Redbridge’s boundaries with Waltham Forest and Epping Forest. The first, announcing our draft proposals and interim decisions to make no proposals, was published on 31 May 1989. Copies were sent to all the local authorities concerned and to all those who had submitted representations to us. Redbridge, Waltham Forest and Epping Forest were asked to publish a notice advertising our draft proposals and interim decision. In addition, they and Essex County Council were requested to post copies of the notice at places where public notices are customarily displayed. They were also asked to place copies of our letter on deposit for
inspection at their main offices for a period of eight weeks. Comments were invited by 26 July 1989.

16. We received a total of 170 individual representations in response to our draft proposals and interim decisions. They included comments from Redbridge, Waltham Forest, Epping Forest, Essex County Council, Lambourne Parish Council, Mr James Arbuthnot MP, Mr Steven Norris MP, and Mr Robert McCrindle MP. The remainder were from local residents and organisations. In addition, Epping Forest conducted a questionnaire survey in the Buckhurst Hill/Chigwell/Grange Hill area, and forwarded 607 completed forms to us.

17. We also received a submission from Forest School, suggesting a number of major and minor realignments along Redbridge's boundary with Waltham Forest. The school had originally submitted its suggestions at the commencement of this review, but we have no record of having received them.

18. Our second letter, announcing our further draft proposals, was issued on 14 December 1990, and received similar publicity. Copies were sent to all the local authorities concerned and to all those who had made representations to us. Comments were invited by 15 February 1991.

19. In response to our further draft proposal letter, we received a total of 252 individual responses, including comments from Redbridge, Waltham Forest, Epping Forest and Essex County Council. In addition, we received 1,406 proforma postcards and a petition bearing 590 signatures.

SUGGESTIONS FOR CHANGE AND OUR CONCLUSIONS

THE BOUNDARY BETWEEN REDBRIDGE AND WALTHAM FOREST

(a) M11 Motorway and the River Roding

20. We noted that, taken together, the M11 Motorway and the River Roding form a major barrier to the west of Redbridge, and considered whether these features would make a good natural
boundary should radical change to the Borough's boundary with Waltham Forest be shown to be necessary. However, we took the view that change on such a scale would have significant effects on both Redbridge and Waltham Forest. In fact, we had received no submissions addressing this issue. In the circumstances, but without prejudice to any representations we might receive during the subsequent stages of our review, we took an interim decision to make no proposals for radical change, and to confine ourselves to addressing the anomalies in the existing boundary.

21. Our interim decision was published as part of our draft proposals letter of 31 May 1989. We received no comments. Accordingly, in the absence of opposition, or any suggestions for change in this area, we have decided to confirm as final our interim decision to propose no radical change in the vicinity of the M11 Motorway and the River Roding.

(b) Bush Wood to Woodford New Road

22. In response to our draft proposals letter of 31 May 1989, Forest School submitted two alternative suggestions for boundary realignments between Bush Wood, in the northern part of Wanstead Flats, and Woodford New Road, both intended to transfer the school and its playing fields to Redbridge. The school referred to its strong historical links with Snaresbrook, in Redbridge. The first suggestion involved a realignment along Bushwood, Whipps Cross Road and Woodford New Road, and the second a realignment along Snaresbrook Road and Woodford New Road. In addition to transferring the school, both suggestions would have had the effect of transferring a large part of Epping Forest, a conservation area and several roads to Redbridge.

23. We noted that the existing boundary splits one of Forest School's playing fields, and that either of the school's suggestions would unite it with the school in Redbridge. However, while acknowledging the historic ties that were said to exist between the school and the Snaresbrook area of Redbridge, it appeared to us to be more closely associated with Waltham Forest. Nor did we feel that unifying the school with its playing field justified the transfer of such a large area from Waltham
Forest to Redbridge. Accordingly, we decided not to pursue the suggestion. We did, however, agree that the boundary is defaced, and decided to consider the minor suggestions for change submitted by the school and by Waltham Forest. These are discussed in paragraphs 39-41 below.

(c) Cambridge Road/Wanstead Flats

Draft proposal

24. Redbridge suggested a realignment of the boundary along Hollybush Hill Road, the North Circular Road and Cambridge Park Road, to unite the Cambridge Road residential area in its authority. Waltham Forest submitted an alternative suggestion, to unite the area in Waltham Forest by a realignment along Hollybush Road, the rear of properties on the south west side of Cambridge Road and then along Lonsdale Road, to meet the existing boundary on Cambridge Park Road.

25. We noted that the existing boundary is defaced and splits many properties, and that the suggestions from both Boroughs would resolve these anomalies. However, we took the view that the Cambridge Road area should be united in one authority, and that it appeared to look more to Redbridge than to Waltham Forest, from which it is separated by a major roundabout, known as the Green Man roundabout, and a network of approach roads, including the A406 North Circular Road. We therefore decided to adopt Redbridge's suggestion as our draft proposal.

Further draft proposal

26. In response to our draft proposals letter, Redbridge supported the Cambridge Road area being united in its authority. However, our draft proposal was opposed by Waltham Forest, on the grounds that such a realignment went beyond what was strictly necessary to rectify the anomalies of divided properties. Nevertheless, the Council commented that, if we were minded to confirm our draft proposal, we should adopt a side of road alignment. We received no comments from residents.
27. We reaffirmed our view that the Cambridge Road area should be united in a single authority, and that, given the barrier effect of the network of roads in the vicinity, it appeared to look more to Redbridge than to Waltham Forest. We considered Waltham Forest's suggestion for a side of road alignment in Hollybush Hill, but concluded that there was insufficient justification for this.

28. However, as part of its suggestion for the boundary between Bush Wood and Woodford New Road, Forest School had proposed an eastern side of road alignment along Bushwood, south of the Cambridge Road area. We noted that the boundary is tied to no ground detail between Harrow Road in the south and Cambridge Park Road in the north, running arbitrarily across Wanstead Flats.

29. We felt that the Flats in this area clearly delimited Redbridge and Waltham Forest, and that a well-defined and identifiable boundary could be found by a realignment along the edge of Wanstead Flats, between Harrow Road and Cambridge Park Road. We therefore decided to issue a further draft proposal to that effect.

Final proposal

30. Our further draft proposal was supported by Redbridge, but opposed by Waltham Forest and two members of the public.

31. Redbridge welcomed our further draft proposal, on the grounds that uniting the Flats in its area would facilitate trading and environmental controls.

32. Waltham Forest commented that the western side of the Flats is primarily used by residents from its authority, who ought (through their local authority) to retain a consultative role in the management of the open space. The Council expressed the view that the existing boundary provides it with an opportunity to liaise with the Epping Forest Conservators, who maintain the Flats on behalf of the City of London Corporation. It also commented that Waltham Forest clears litter from its part of the
Flats, thereby preserving their amenity value for residents, and has provided funding for a children's playground north of Harrow Road.

33. The Council also pointed out that, as a result of a planned upgrading of the A12 by the Department of Transport, the layout of the Green Man roundabout is to be altered. This, in the Council's view, would make our proposed realignments at Wanstead Flats and Cambridge Road redundant. It also sought the retention in Waltham Forest of the whole of the junction between Bush Road and Browning Road, on the grounds that both roads provide access to housing in the Borough. Also, the Council again suggested that we modify our proposal for Cambridge Road to provide a side of road alignment along Hollybush Hill, thereby making Redbridge solely responsible for the road's maintenance.

34. We acknowledged that the western part of Wanstead Flats is probably used as an amenity area by Waltham Forest residents. However, we noted that the Council's input to the area's management is limited, and considered that such responsibilities as it had taken upon itself, with the agreement of the Epping Forest Conservators, could be carried out no less effectively by Redbridge. We also noted Redbridge's comment that the existing boundary had resulted in difficulties over the enforcement of environmental and trading controls. We therefore concluded that it would be in the interests of effective and convenient local government to unite this part of Wanstead Flats in Redbridge.

35. We considered Waltham Forest's request for a side of road realignment along Hollybush Hill, but reaffirmed our view that insufficient justification had been given for the Council's suggestion.

36. However, we noted Waltham Forest's comment in respect of the major road works that are to take place at the Green Man roundabout, and its request that the junction between Bush Road and Browning Road should be retained in its authority. We recognised that our proposal for Cambridge Road would be defaced by the Department of Transport's upgrading of the A12. However, we considered that this could be avoided by realigning the
boundary to the north eastern side of Holly Road, retaining the present boundary across Wanstead Flats as far as Bush Road, then following the southern side of Bush Road westwards, to rejoin our further draft proposal for Wanstead Flats at the junction with Browning Road. We noted that such a realignment would also retain the Bush Road/Browning Road junction in Waltham Forest. We have therefore decided to confirm as final our draft proposal for the Cambridge Road area, and further draft proposal for Wanstead Flats, subject to this modification.

(d) Snaresbrook Crown Court, Rivenhall Gardens and Forest School Sports Ground

Maps 3/4

Draft proposal

37. Redbridge suggested a number of minor realignments to unite Snaresbrook Crown Court and properties in the Rivenhall Gardens area in its authority. We received no suggestions for change from Waltham Forest.

38. We noted that Redbridge's suggestions would unite a number of split properties and rectify stretches of defaced boundary. We therefore decided to adopt them as our draft proposal for this area.

Further draft proposal

39. Redbridge supported our draft proposal. Waltham Forest did not oppose it, but suggested a modification, to unite Forest School's Sports Ground in Redbridge. We received a similar suggestion from Forest School, as an alternative to its suggestions for more substantial change, which are discussed in paragraphs 22 and 23 above. The school proposed a realignment following Snaresbrook Road west from the existing boundary and then north along a wall, to rejoin our draft proposal at the north west corner of the sports ground.

40. We agreed that Forest School's suggestion would tie the boundary in this area to clearly identifiable ground detail, while satisfactorily unifying the sports ground in Redbridge. We
therefore decided to adopt the school's suggestion as our further draft proposal, together with a realignment to a drainage channel adjoining the western side of Eagle Pond, which we felt would rectify a small stretch of defaced boundary to the south of Snaresbrook Road.

Final proposal

41. Redbridge supported our further draft proposal to realign the boundary along a wall running north from Snaresbrook Road, and along the western perimeter of the Forest School sports ground. We received no other representations, and have decided to confirm our draft proposal, as modified by our further draft proposal, as final.

(e) Woodford Green

Draft proposal

42. The existing boundary in this area divides the community of Woodford Green, splits a number of properties and is defaced.

43. Redbridge suggested realigning the boundary along a break in development to the west of Woodford Green, following a line through part of Epping Forest and the eastern curtilage of Highams Park, thereby uniting the community in its authority. The Council commented that its suggestion would recognise the community of interest which residents of the area have with the larger part of Woodford Green, in Redbridge. Other reasons given for the suggestion included rectifying the division of properties and uniting the whole of Woodford Green Golf Course in one authority.

44. Redbridge's suggestion was opposed by Waltham Forest, on the grounds that the area in question has always been administered from Walthamstow which, it said, is geographically more convenient to residents than Redbridge's administrative centre, in Ilford. The Council commented that the location of, and the distance to, administrative centres was particularly relevant, given that approximately 20% of the electors who would be
affected by Redbridge's suggestion lived in Waltham Forest-owned properties. As an alternative, Waltham Forest suggested realigning the boundary along Woodford New Road and High Road Woodford Green, then west along Links Road and High Elms.

45. The suggestions from Redbridge and Waltham Forest aroused significant public interest; we received 56 letters from residents and local firms commenting on the suggestions, 55 of which supported uniting Woodford Green in Redbridge. We were informed that there is a strong community of interest between the two parts of Woodford Green, and that residents look to Redbridge for shopping, libraries and other services. A number of respondents commented that the effect of Waltham Forest's suggestion would be to divide further what is essentially a single community.

46. We noted that Redbridge's suggestion had the support of a number of residents. In the light of the representations we had received, we agreed that Woodford Green appeared to be a single settlement with a strong community of interest which should be united in one authority. We therefore decided to adopt Redbridge's suggestion as our draft proposal.

Final proposal

47. Redbridge supported our draft proposal. However, it was opposed by Waltham Forest, which also submitted suggestions for a number of minor modifications, should we be minded to confirm our draft proposal. In addition, we received representations from 13 residents and local organisations; six supporting our draft proposal, four opposing it, and three proposing further boundary changes. It was also supported by Mr James Arbuthnot MP.

48. Waltham Forest commented that our draft proposal was more sweeping than was necessary to rectify the anomalies along this stretch of boundary, and expressed the view that it would have an adverse effect on the Borough, both in terms of the number of electors that would be lost to Redbridge and the number of Council-owned properties. The Council also commented that
Woodford Green is closer to its administrative centre, in Walthamstow, than to Redbridge's, in Ilford, and that its education facilities are also closer, and more accessible.

49. The Council expressed the view that there has always been a distinct barrier between the two parts of Woodford Green, created by the High Road and by the area of open space known as Woodford Green. It did not consider that the High Road acted as a focus for the community, as it contained relatively few shops and facilities. Rather, Waltham Forest considered that residents of the area tended to look westwards, to the Highams Park Station area in its authority, where a number of shops, services, a school and recreational facilities are located.

50. We received similar comments from a local resident, who said that our draft proposal would still leave Woodford Green split between two boroughs, and that Woodford New Road and the High Road created a significant barrier. The Chingford Labour Party expressed the view that there appeared to be no strong community of interest between the two parts of Woodford Green, and suggested that a realignment along Woodford New Road and Chingford Lane would provide a clear boundary, and be less divisive. The Chingford Conservative Association supported Waltham Forest's original suggestion that the boundary be realigned along Woodford New Road, expressing concern over the number of Waltham Forest-owned properties which would be transferred to Redbridge under our draft proposal. The Association considered that the western part of Woodford Green could not easily be serviced by Redbridge.

51. The Highams Residents' Association supported our draft proposal, with the exception of that part of it in the vicinity of The Highams Park. The Association commented that the park had always been an integral part of the Highams Estate, in Redbridge, and that it would be unsatisfactory to unite Woodford Green in Redbridge while leaving the park in Waltham Forest. The Association therefore suggested that, as a modification to our draft proposal, the boundary should be realigned along the course of the River Ching.
52. We noted that Waltham Forest had opposed our draft proposal on a number of grounds. We acknowledged that uniting Woodford Green in Redbridge would result in the transfer of over 2,000 electors and a proportion of council-owned housing from Waltham Forest. However, we considered that change on such a scale was unlikely to have any significant impact on the future viability of the Borough, either in terms of population or in revenue receipts.

53. In considering Waltham Forest's views on the community of interest within Woodford Green, we noted its assertion that the main shopping centre for the area is in the vicinity of Highams Park Station, rather than along the High Road, and that residents have greater affinity with Highams Park, which is also the location of schools and recreational facilities. We acknowledged that there are more small shops and facilities in the Highams Park area, but considered that it is more likely that, for the bulk of their shopping needs, residents look more to South Woodford, to the south east of Woodford Green in Redbridge, where there is a large selection of national chain stores and a wider range of services.

54. We agreed that Woodford New Road and High Road do, to an extent, form a barrier to movement between the two parts of Woodford Green. However, we felt that the area is more clearly delimited by The Highams Park and Epping Forest to the west, which provide a break in urban development. We also noted that there are conservation areas on both sides of the existing boundary, which our draft proposal would have the effect of uniting. This tended to reinforce our view that Woodford Green is a single community divided by the existing boundary.

55. We considered the suggestion by the Highams Residents' Association that Woodford Green should be united by realigning the boundary along the River Ching. However, we noted that this would split The Highams Park between the two authorities, which we considered would not be in the interests of effective and convenient local government. Accordingly, we have decided to confirm our draft proposal as final, subject to the adoption of Waltham Forest's suggestions for minor modifications.
Further draft proposal

56. North east of Woodford Green, Chingford Football Ground is split by the existing boundary. In response to our draft proposals letter, Waltham Forest submitted a new suggestion to unite the ground in its authority. We received a similar suggestion from a resident, who proposed realigning the boundary in a northerly direction from the junction of Chingford Lane and Lichfield Road to the eastern side of the football ground.

57. We considered that Waltham Forest's suggestion, to realign the boundary round the southern and eastern sides of the ground, was the more appropriate and made better use of ground detail. We therefore decided to adopt it as our further draft proposal.

Final proposal

58. Our further draft proposal was supported by Redbridge, Mr James Arbuthnot MP and by one member of the public. We received no other representations, and have decided to confirm it as final.

THE BOUNDARY BETWEEN REDBRIDGE AND EPPING FOREST, IN ESSEX

59. In addressing Redbridge's boundary with Epping Forest, we felt it necessary to consider whether there was a case for transferring the Loughton area to Redbridge, especially as the Herbert Commission had recommended that the London County Council's Debden Estate should be brought within the Greater London boundary. We noted that the M25 Motorway might provide the basis of a suitable boundary should such change be thought appropriate.

60. However, we also noted that the transfer of Loughton from Epping Forest would have serious repercussions on that authority, and might bring into question its future viability. Accordingly, and in the absence of any representations proposing major change
in this area, we took an interim decision to propose no radical realignments, and to consider only the lesser boundary anomalies.

61. In the event, we received no suggestions for major change in response to our interim decision, and have decided to confirm it as final.

(a) Beech Avenue; High Road, Buckhurst Hill; Knighton Lane; and Beresford Drive

Draft proposal

62. Both Redbridge and Epping Forest submitted a number of similar suggestions to rectify stretches of defaced boundary in this area, and to unite properties which are split by the boundary.

63. We agreed that the suggestions from both authorities would resolve the anomalies in the existing boundary, but felt that the side of road realignments proposed by Epping Forest would facilitate highway maintenance. We therefore decided to adopt Epping Forest's suggestions as our draft proposal.

Final proposal

64. Both Redbridge and Epping Forest supported our draft proposal. Essex County Council did not comment. We have decided to confirm it as final.

(b) The Buckhurst Hill/Chigwell/Grange Hill area

Draft proposal

65. Redbridge proposed realigning the boundary along the Roding Valley branch of the LT Central Line. This would have the effect of transferring parts of Buckhurst Hill and Chigwell, and all of Grange Hill, to Redbridge. In support of its suggestion, the Council commented that the branch line would form a more natural physical boundary which would take account of the community of
interest in the area, and that management responsibilities for services and facilities would be simplified.

66. Epping Forest strongly opposed Redbridge's suggestion. The Council raised a number of objections, commenting that the suggested realignment would sever communities at Buckhurst Hill and Chigwell; adversely affect the viability of the Council; create uncertainty over development control and strategic planning policies in the area; and run counter to the principle it said was established by the Herbert Commission, that the Greater London boundary should not extend into the Metropolitan Green Belt. Similar objections were received from Essex County Council. As an alternative, Epping Forest submitted a number of suggestions for minor realignments, intended to overcome specific anomalies.

67. We also received 15 representations from residents and local organisations. Of these, four supported Redbridge's suggestion, while eleven opposed it.

68. In considering the suggestions for change submitted to us, we felt that, in principle, Grange Hill looks more to London than it does to Essex, with strong ties to the City of London and beyond through its road and rail commuter links. We also agreed with Redbridge that the outer London boundary is poor in this area, running through continuous urban development which is of a similar character on both sides of the boundary, and that the branch line of the LT Central Line would provide a clear and well-defined boundary, particularly in the east, where it formed a break between Grange Hill and open land.

69. However, we recognised that such a realignment would split the community of Chigwell, which is wholly in Essex, between Epping Forest and Redbridge. Despite its good access to London commuter routes, it appeared to us that this particular area is detached from London, looking more to Essex, and is different in character to the development to the south. We therefore concluded that it would not be in the interests of effective and convenient local government to split the community. Accordingly, we decided to adopt Redbridge's suggestion for a general
realignment of the boundary to the branch line of the LT Central Line as our draft proposal, subject to a departure from the railway in the vicinity of Chigwell, to leave that community united in Epping Forest.

Final proposal

70. Our draft proposal for this area elicited a considerable number of representations on two, quite separate, occasions; first, in response to our draft proposals letter of 31 May 1989, and then again in response to our further draft proposals letter of 14 December 1990, in which we gave details of our proposals for electoral changes in the Buckhurst Hill/Chigwell/Grange Hill area. On both occasions the representations addressed the same issue, namely the transfer of Buckhurst Hill and Grange Hill to Redbridge, and were similar in content. We have therefore felt it appropriate to give details of our consideration of both sets of representations in this part of the report.

(i) Response to our draft proposals letter of 31 May 1989

71. Redbridge supported our draft proposal which, in part, followed its original suggestion to transfer parts of Buckhurst Hill and Grange Hill to its authority, using the Roding Valley Branch of the LT Central Line. Our draft proposal diverted from the railway in the vicinity of Chigwell, to keep the village united in Epping Forest by following the M11 Motorway, Luxborough Lane and Chigwell High Road.

72. However, Epping Forest and Essex County Council both objected strongly to our draft proposal, suggesting the adoption of the former's original submission to us for minor boundary realignments. It was also opposed by Lambourne Parish Council, Mr Robert McCrindle MP, Mr Steven Norris MP and by 141 local residents and organisations who wrote to us. In addition, we received 607 completed questionnaires, forwarded to us either individually or from Epping Forest, and four petitions. Our draft proposal was opposed by 574 of the questionnaires and three of the petitions, containing 407 signatures. It was supported by 33 of the questionnaires and one of the petitions, bearing 18 signatures.
signatures. We also received 10 letters from local residents supporting our draft proposal, and a number of suggestions for modifications.

(ii) Response to our further draft proposals letter of 14 December 1990

73. Our draft proposal was again opposed by Epping Forest, Essex County Council and by Mr Steven Norris MP. We also received 210 individual letters from local residents, councillors and organisations, and a petition bearing 590 signatures, forwarded by Mr Norris' Constituency Office, all opposing the area's transfer to Redbridge. However, it was supported by Redbridge, and by 34 residents who wrote to us. In addition, Epping Forest undertook a questionnaire survey of residents, and subsequently submitted a total of 1,406 pre-paid postcards; 1,235 of the cards opposed the transfer of Grange Hill and part of Buckhurst Hill to Redbridge, while 171 supported it. (In its response, Epping Forest commented that it had submitted a total of 2,358 pre-paid postcards, and that further postcards had subsequently been forwarded to us. However, the figures given above are an accurate record of the responses actually received.)

74. Epping Forest opposed our draft proposal on a number of grounds, including education, highway maintenance, land ownership and health service provision. The Council also referred to the effect which it would have in terms of population transferred to Redbridge, the loss of revenue income, council-owned housing, and electoral representation, which it considered might call its future viability into question. It considered that we had not appeared to have taken this factor into account in adopting our draft proposal. The Council pointed out that the former Chigwell Urban District Council had successfully opposed its area being brought into Greater London at the time of London government re-organisation in 1965, and commented that circumstances had not changed in the intervening period.

75. The Council also contested the appropriateness of the branch line as a boundary. It expressed the view that it is not a barrier to movement, and that a community of interest extends
across it, between Chigwell Village, Buckhurst Hill and Grange Hill, referring to the local shops, services, churches and social activities which link the areas. In addition, it commented that our draft proposal would sever an area of green belt which, it contended, requires a co-ordinated management approach, and referred to the need to contain the outward expansion of London by preventing inroads into the green belt.

76. Essex County Council supported Epping Forest's grounds of objection, commenting that Grange Hill is closely connected to Chigwell, and that the loss of West Hatch County High School would disrupt education provision within the County. It pointed out that education provision in Epping Forest had recently been re-organised, and that West Hatch County High School had, together with two other large secondary schools, been given a key role in feeding a tertiary college. The Council expressed the view that the loss of the high school and other feeder primary schools to Redbridge would cause severe disruption to the education system.

77. The County Council also commented that our draft proposal would affect library provision in Epping Forest. While the library at Chigwell was not being transferred, Grange Hill residents constituted some 71% of its users. The Council therefore considered that the transfer of the residents to Redbridge could jeopardise the future viability of the library. It also felt that the loss of a civic amenity point at Luxborough Lane could create difficulties, as an alternative site would be difficult to find.

78. Essex County Council also considered that Epping Forest could be severely disabled by the loss of population to Redbridge, and the resultant reduction in its revenue base. The Council expressed the view that the extent of our draft proposal was incompatible with our guidelines from the Secretary of State (contained in Department of the Environment Circular 20/86), and disputed whether it would lead to more effective and convenient local government. Both Epping Forest and the County Council commented that our guidelines could be interpreted as containing presumption against major change to the Greater London boundary.
Both Epping Forest and Essex County Council emphasised the volume and strength of public opposition to the transfer of Buckhurst Hill and Grange Hill, and sought a public inquiry in order that residents might have the opportunity to voice their views in a public forum. A similar request was made by Mr Steven Norris MP and several residents, who felt that we had given inadequate weight to the wishes of the people.

By far the majority of representations we received were from residents of the Buckhurst Hill and Grange Hill areas. Many of those who objected to our draft proposal focused on the potential disruption to education which might result from the transfer of West Hatch County High School to Redbridge. A number of respondents felt that the school was of central importance to Epping Forest's education system, and referred to the different system operating in Redbridge.

We received 15 representations from residents of Chigwell, in the area between the branch line and our proposed realignment to the south. They opposed our draft proposal on the grounds that it left them in Epping Forest. Those residents expressed the view that there is no affinity between the parts of Chigwell on either side of the railway, that the railway does divide the area, and that the southern part of Chigwell could be more conveniently and efficiently serviced by Redbridge.

We received a number of other representations, including from a local Epping Forest councillor, the Epping Forest Conservative Association and the Buckhurst Hill Residents' Society, expressing the view that Epping Forest's housing stock would be severely depleted as a result of the transfer; that council house waiting lists would be lengthened; and that a supply of cheap accommodation in the District for homeless and single people would be lost. Respondents also referred to Epping Forest as having a better record than Redbridge in the management of the green belt, and that the transfer of the areas in question would contribute to the expansion of urban London.

Respondents also considered that Chigwell forms the centre of a community to which Buckhurst Hill and Grange Hill both look,
and expressed the view that our draft proposal would divide this community of interest, destroying the area's "village-like atmosphere". Others commented that there are few links between Grange Hill and Hainault to the south, in Redbridge, and that, other than at Fencepiece Road, the general line of the existing boundary runs along roads which provide no vehicular access between the two authorities.

84. A number of respondents who supported our draft proposal expressed the view that the area is urban rather than rural in character, looks to Redbridge for shopping facilities, and is isolated from Epping Forest's administrative centre in Epping. Others commented that services were more easily or readily available from Redbridge than from Epping Forest, and that Chigwell and Grange Hill look towards the urban environment of Greater London, with Ilford in particular acting as a magnet. The benefits to pensioners from free bus travel within Greater London were also referred to. One resident advocated the break up of Epping Forest, which he considered to be an artificial amalgam of disparate communities.

85. We received three other suggestions for modifications to our draft proposal. One respondent suggested that, to retain Epping Forest's education facilities, the boundary should be realigned along the River Roding, the Roding Valley branch line, the M11 Motorway, Luxborough Lane, Forest Lane and Manor Road. This would transfer development to the east of Buckhurst Hill and south of Chigwell to Redbridge. Another suggestion was to realign the boundary along Fencepiece Road, Limes Avenue and Copperfields, transferring only a part of Grange Hill.

86. We also received suggestions from two firms for extensions to our draft proposal, to transfer parts of Chigwell Row ward to Redbridge. The first sought to bring Chigwell Row, to the east of Chigwell, within Redbridge, on the grounds that such a realignment would best represent both the limit of Greater London and of the green belt. The second commented that the existing boundary is drawn too closely around the built-up area of Hainault. It suggested the transfer to Redbridge of an area to
the south of Lambourne Road bounded by Romford Road and the
northern part of Hainault.

Buckhurst Hill and Grange Hill: our conclusions

87. We have a statutory duty to make proposals to you for
boundary changes which appear desirable to us in the interests
of effective and convenient local government. Our guidelines,
contained in Department of the Environment Circular 20/86 in
respect of our review of London, advise us that, in conducting
boundary reviews, we should have regard to three criteria:
"whether or not an area or boundary accords with the wishes of
the people, reflects the pattern of community life, and is
conducive to the effective and convenient operation of local
government and associated services." The guidelines also advise
us to examine "the need for the adjustment of local authority
boundaries to overcome specific problems arising from historic
anomalies or from subsequent changes in the pattern of
development."

88. We are further advised that special care should be taken in
considering changes to the Greater London boundary, since the
distribution of functions is substantially different between
shire counties and districts and London boroughs. However, where
the boundary has been overlaid by development, we are advised
that some changes may be necessary.

89. We reassessed our draft proposal in the light of all the
responses, and acknowledged the strength of feeling expressed by
the considerable number of Buckhurst Hill and Grange Hill
residents who made their views known to us - that they have no
wish for their areas to be united in Redbridge. In taking
account of the representations received, we have had to bear in
mind that, in addition to the wishes of the people, we must also
consider the pattern of community life and the effective
operation of local authority services.

90. We considered many of the arguments against our draft
proposal to be unconvincing. In particular, we found no
substance in Epping Forest's claim that the transfer of Grange
Hill and parts of Buckhurst Hill would threaten its future viability as a local authority. Indeed, we noted that, in terms of population, Epping Forest is significantly larger than either of the adjoining districts of Brentwood and Broxbourne, and that the implementation of our draft proposal would barely dent that numerical superiority. We had separately decided not to pursue radical change in the Loughton area, which would have affected the viability of Epping Forest.

91. Nor could we find any evidence for the claims that Redbridge would be a poor custodian of green belt. A considerable amount of green belt was brought under the management of London boroughs in 1965, and remains so today. As discussed in paragraph 13 above, under planning legislation, the protection afforded to areas of green belt is the same regardless of authority type.

92. Similarly, we considered Epping Forest's and Essex County Council's comments regarding the effects of our draft proposal on education provision within the County as being unduly alarmist. The concept of feeder schools, where a number of schools have specific, close links with another school to which the majority of their pupils will move at a given age, is a matter for local arrangements. They can, and frequently do, link schools in different authorities. We are also aware that initiatives such as the local management of schools and grant maintained status, introduced by the Education Reform Act 1988, together with the recent reinforcement of parental choice by the Courts, have much reduced the effect of boundary changes on education provision within an authority's area.

93. Our guidelines from the Secretary of State advise us of the need to correct boundaries which are overlain by development, and concluded that the suggestions for minor change submitted by Epping Forest and others took insufficient account of patterns of development and community ties in the area. We remain of the opinion that the Greater London boundary should be based on clearly defined, long-lasting features. The current boundary passes arbitrarily through an area of continuous urban development in Grange Hill and Buckhurst Hill; divides property; is undefined; is difficult to identify on the ground; and is poor
in detail. In the absence of radical change, which we have
discounted in this review, our view remains that the Roding
Valley branch line, despite lying in a cutting, is the most
significant physical feature in the area, forming a considerable
obstacle to movement, and would provide a clearly defined
boundary.

94. We considered that Grange Hill and the southern part of
Buckhurst Hill are more closely linked with Hainault and the
Woodford Green area in Redbridge than with Chigwell in Essex, and
reaffirmed our view that they are northern extensions of that
Borough; realistically, they could only be regarded as part of
the London conurbation. In terms of effective and convenient
local government, it could be said that they belong with
Redbridge, whose administrative facilities are closer and more
accessible than those of Epping Forest. We also noted that far
more services and facilities are available locally in Redbridge;
that there are good transport links between the area and the
Borough; and that the nature of development in Buckhurst Hill and
Grange Hill is consistent with that in Hainault and Woodford
Green.

95. Conversely, we considered that Chigwell has more in common
with rural Essex, and looks less to London. We took the view
that Chigwell is an homogeneous area, and felt that to use the
Roding Valley branch line in the vicinity of Chigwell would be
to divide a community rather than to unite one. Nor did we feel
that a case had been made, in terms of effective and convenient
local government, for the transfer to Redbridge of areas of green
belt land to the north of Grange Hill and Hainault, which, in any
event, appeared to relate more to Chigwell Village and Chigwell
Row.

96. We have taken full account of the strongly held views of
those who wrote to us, signed petitions or completed
questionnaires. We are grateful to all who took the trouble to
submit their observations. However, we have felt bound to
conclude that Buckhurst Hill and Grange Hill form part of the
urban fabric of Greater London, that the pattern of community
life looks more to Redbridge and Greater London than to Epping
and Essex, and that it would be in the interests of effective and convenient local government for these areas to be united in Redbridge. We have therefore decided to confirm our draft proposal as final.

97. We considered whether there was a need to hold a local meeting or public local inquiry into the issues raised by our draft proposal, as suggested by Mr Steven Norris MP and a number of other respondents. However, it is our practice to hold local meetings only when there is a clear need to seek further information which we cannot obtain by any other means. In this case, we are of the view that the responses to our letters of 31 May 1989 and 14 December 1990 provided sufficient information on the views of local residents to make a local meeting unnecessary.

(c) Buckhurst Hill, Chigwell and Grange Hill: Electoral consequences

Further draft proposal

98. Having decided to confirm our draft proposal for these areas, we were aware that it would result in significant electoral consequences, involving the transfer of 6,450 electors from the Epping Forest wards of Buckhurst Hill East, Chigwell Village and Grange Hill to Redbridge. As a full electoral review of England is likely to take place within a few years, we decided to adopt as our further draft proposal such arrangements as would, in the meantime, result in the most satisfactory level of electoral representation. These are detailed in the following paragraphs.

99. We noted that our draft proposal would transfer Grange Hill as a whole ward to Redbridge. This is currently a three member ward in Essex. However, we considered that, to achieve a level of electoral equality compatible with the level of representation in existing Redbridge wards, it should be transferred to that authority as a two member ward. We noted that this would still leave Grange Hill ward with a generous level of representation.
100. We also considered that Redbridge's Bridge ward should be divided to form two new wards, with the boundary running north-south along the River Roding from the existing Bridge ward boundary in the south, to our proposed boundary at the Roding Valley branch of the Central Line. We considered that that part of Bridge ward east of the River Roding should be amalgamated with that part of Chigwell Village ward to be transferred to Redbridge, thereby forming a new ward with the suggested name of 'East Bridge'. We also considered that that part of Bridge ward west of the River Roding should be amalgamated with that part of Buckhurst Hill East ward to be transferred to Redbridge, to form a new ward provisionally called 'West Bridge'. We proposed that each new ward should have two members.

Final proposal

101. Our further draft proposal was supported by Redbridge, as an interim measure pending a full electoral review, but opposed by Epping Forest.

102. Epping Forest commented that it would prefer any new warding arrangements to be deferred until our full electoral review. In addition to being concerned over the loss of population to Redbridge, the Council criticised the transfer of the whole of Grange Hill ward, and questioned how the southern boundary of that ward could be left intact when we had already judged it to be unacceptable as an administrative boundary.

103. We also received comments from Mr James Arbuthnot MP and Mr Vivian Bendall MP. Both doubted whether splitting Redbridge's Bridge ward was a good proposal, and suggested linking Grange Hill ward with that part of Chigwell Village ward which we had proposed be transferred to Redbridge, to form a new, two-member ward in that authority. Mr Arbuthnot also suggested increasing the size of Bridge ward by amalgamating it with that part of Buckhurst Hill East ward which we had proposed to be transferred. In addition, a number of more radical re-warding arrangements were suggested which, Mr Bendall commented, might be more appropriate to a full electoral review.
104. We considered the comments and suggestions submitted to us, but concluded that, in advance of a full electoral review, our further draft proposal offered the most equitable arrangements in terms of electoral representation. We have therefore decided to confirm it as final.

**ELECTORAL CONSEQUENCES**

105. In addition to the changes to electoral arrangements referred to in paragraphs 98-104 above, there are other electoral consequences for the local authorities affected by this review. The details of these are described in Annex B to this report.

**CONCLUSIONS**

106. We believe that our final proposals, which are summarised in Annex C to this report, are in the interests of effective and convenient local government and we commend them to you accordingly.

**PUBLICATION**

107. A separate letter is being sent to the London Boroughs of Redbridge and Waltham Forest, Epping Forest District Council, and Essex County Council, asking them to deposit copies of this report at their main offices for inspection for a period of six months. They are also being asked to put notices to that effect on public notice boards. Arrangements have been made for similar notices to be inserted in the local press. The text of the notice will explain that the Commission has fulfilled its statutory role in this matter and that it now falls to you to make an Order implementing the proposals, if you think fit, though not earlier than six weeks from the date our final proposals are submitted to you. Copies of this report, with the maps attached at Annex A illustrating the proposed changes, are being sent to all those who received our draft and further draft proposals letters of 31 May 1989 and 14 December 1990, and to those who made written representations to us.
Signed

G J ELLERTON (Chairman)

K F J ENNALS

G R PRENTICE

HELEN SARKANY

C W SMITH

K YOUNG

R D COMPTON
Secretary
19 March 1992
LOCAL GOVERNMENT BOUNDARY COMMISSION FOR ENGLAND

REVIEWS OF GREATER LONDON, THE LONDON BOROUGHS
AND THE CITY OF LONDON

REDBRIDGE LB

AFFECTING WALTHAM FOREST LB AND ESSEX COUNTY

FINAL PROPOSALS

Existing LB Boundary _______________________
Proposed LB Boundary __ __ __ __ __ __
Existing Ward Boundary_____________________
Proposed Ward Boundary____________________

Produced by Ordnance Survey for the
Local Government Boundary Commission for England
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SUMMARY OF PROPOSED BOUNDARY CHANGES

**Boundary between Redbridge and Waltham Forest**

- **Cambridge Road/Wanstead Flats**
  - Realignment to Hollybush Hill/Holly Road, and to western perimeter of Wanstead Flats south of North Circular
  - Paragraphs 24-36, Maps 1/2

- **Snaresbrook Crown Court/Rivenhall Gardens and Forest School sports ground**
  - Realignment to unite sports ground, Rivenhall Gardens and Crown Court in Redbridge
  - Paragraphs 37-41, Maps 3/4

- **Woodford Green**
  - Realignment to unite Woodford Green in Redbridge
  - Paragraphs 42-55, Map 5

- **Chingford Football Ground**
  - Realignment to unite football ground in Waltham Forest
  - Paragraphs 56-58, Map 6

**Boundary Between Redbridge and Epping Forest**

- **Beech Avenue/High Road, Buckhurst Hill/Knighton Lane/Beresford Drive**
  - Realignments to unite properties
  - Paragraphs 62-64, Maps 7/8

- **The Buckhurst Hill/Chigwell/Grange Hill area**
  - Realignment to unite Grange Hill and southern part of Buckhurst Hill in Redbridge
  - Transfer Grange Hill Ward to Redbridge; create East Bridge and West Bridge Wards in Redbridge
  - Paragraphs 65-97, Maps 8/9

- ****
  - Paragraphs 98-104, Maps 8/9

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