



Issue 4a (Crossrail Corridor IGA,
Policy LP1B)

LBR Rep ID: R01087

Mr Simon Jones - NELFT

Mr Iain Hill - Ingleton Wood LLP (Agent)

London Borough of Redbridge

Examination of Redbridge Local Plan 2015 - 2030

Hearing Statement on behalf the North-East London NHS Foundation Trust (NELFT)

Background

1. This Hearing Statement has been prepared on behalf the North-East London NHS Foundation Trust (NELFT) in support of representations to the Redbridge Local Plan 2015-2030 Pre- Submission Draft (July 2016). The Statement seeks to address Issues and Questions raised by the Inspector, specifically Issue 4a (Crossrail Corridor - Policy LP1B), based on the additional and updated evidence produced by the London Borough of Redbridge (the Council).
- 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. As detailed in the representation submitted on behalf of NELFT (R01087) the identification of land in and around King George and Goodmayes Hospital as a Development Opportunity Site within the Crossrail Corridor Investment and Growth Area is fully supported.
3. Having reviewed the Local Plan Spatial Strategy Topic Paper (LBR1.04), it is evident that in order to strike a balance between its Objectively Assessed Housing Need and the identified constraints, the Council's preferred approach of a combination of urban densification and the release of Green Belt land is appropriate.
4. The Sustainability Appraisal (LBR 1.11.2) further demonstrates that the release of the King George and Goodmayes Hospital site would, in accordance with the NPPF, help deliver sustainable patterns of development.
5. Whilst the site is currently designated as Green Belt, the Green Belt Review Addendum (LBR 2.41.1) and Green Belt Review Addendum Appendix 1 (LBR 2.41.2) confirm that the King George and Goodmayes Hospital sites do not satisfy any of the 5 purposes of the Green Belt (paragraphs 3.17.4 to 3.17.8 of LBR 2.41.1) as identified at paragraph 80 of the NPPF. Accordingly, the release of the site from the Green Belt and identification as a Development Opportunity Site within the Crossrail Corridor Investment and Growth Area is fully in accordance with the NPPF.

6. The part of the proposed Development Opportunity Site covering Goodmayes Hospital is considered deliverable having regard to paragraph 47 of the NPPF. As detailed in the representation submitted on behalf of NELFT (R01087), the site is due to become vacant within the next 18-24 months and, accordingly, will be available for development. The site constitutes a suitable location for development (for reasons outlined elsewhere in this Statement and the representation) and provides a realistic prospect that residential development will be provided within 5 years. In respect of the latter, it is noted that the Council's Schedule of Modifications to Appendix 1 Development Opportunity Sites, March 2017 (LBR 1.01.3) states that the site is now likely to be delivered in Phasing Period 2 (2021-2025). Whilst a planning application is yet to be submitted, as detailed in the representation, NELFT's intention is to submit a planning application for the redevelopment of the site in the near future. Based on an approximate timescale to secure planning permission, it is envisaged that the site will come forward in advance of Phasing Period 2. The site is, therefore, considered viable, subject to the assessment of detailed planning considerations at the planning application stage.
7. Since the submission of representations, the Council have produced a Concept Masterplans Greenbelt Release Sites (LBR 2.78). The document, so far as it relates to the Goodmayes and King George Hospital site is, in principle, supported. The document, along with the revised version of Policy LP1B as contained within the Schedule of Modifications to Redbridge Local Plan (LBR 1.01.2), provides sufficient detail in respect of use, form and scale of development. To provide any further detail would result in the policy being too prescriptive for the allocation of a strategic site. As drafted the Policy and Concept Masterplan provide a clear indication of how the site should be developed, whilst, importantly, allowing development proposals to respond to changing circumstances.
8. Notwithstanding the foregoing, it is requested that further information / clarification is provided in either the Policy or the Concept Masterplan in relation to the quantum, form and phasing of development.
9. The representations submitted on behalf of NELFT (R01087) and subsequent work undertaken by BHRUT (RO1090) demonstrate that the site has an indicative development capacity to deliver approximately 500 residential units. Accordingly, whilst the indicative figure is supported, the policy should state that, subject to detailed design considerations at the planning application stage, it may be possible to accommodate more units on the site.
10. Draft Policy LP1B has been updated, as detailed within the Schedule of Modifications to Redbridge Local Plan (LBR 1.01.2), to recognise that the development of the King George and Goodmayes Hospital site can come forward in a phased manner, reflecting the fact the land is in separate ownership, in the context of a Planning Brief / Masterplan for the site as a whole.
11. Whilst the principle of this amendment is supported, it is requested that the Policy also recognises that land within an individual landowner's ownership is likely to be delivered in a phased manner i.e. the main Goodmayes Hospital site is likely to be delivered separately from land to the south (referred to as Site D in the representations – RO1087).
12. Given the Council have produced a Concept Masterplan for the site (LBR 2.78), it is requested that the policy is revised to state that the sites will be expected to be delivered within the context of that document. As drafted, the policy provides a degree of ambiguity given the reference to a Planning Brief / Masterplan for the whole site.

The Concept Masterplan provides an overarching framework for the site as a whole, which can be used to inform the preparation of subsequent planning applications. The requirement for a further Planning Brief / Masterplan would potentially delay the delivery of the site and, therefore, compromise the effectiveness of the policy.

13. The Schedule of Modifications to the Redbridge Local Plan (LBR 1.01.2) seeks to revise Policy LP1B to state:

“The conversion and reuse of non-designated historic assets will enable provision of new homes. This will include conversion of the former mental health asylum buildings.”

14. Whilst NELFT’s intention is to retain and convert the former mental health asylum buildings, in order to ensure that the policy is not overly prescriptive and is positively prepared, it should recognise that, in certain cases, it may not be feasible or viable to retain the existing buildings. It is acknowledged that an applicant will be required to demonstrate why a building cannot be retained.
15. The Policy identifies the need to provide an 8 FE Secondary School and an indicative area is identified on the Concept Masterplan. Whilst recognising that the Concept Masterplan is indicative, further information is required on the potential land take of a Secondary School to fully understand the implications of the identified education requirements, having regard to, amongst other things, Building Bulletin 103: Area Guidelines for Mainstream Schools (June 2014). Details of the assumptions made in respect of the provision of a Secondary School within the Council-led Concept Masterplan are requested. This information is key in order to fully understand the capacity of the site and potential implications for the deliverability (viability) of the proposed allocation.
16. In relation to the Secondary School, further clarity is also requested on the intended mechanisms to deliver the facility if required. The Council’s Infrastructure Delivery Plan (LBR 2.21) (and CIL Regulation 123 List) make reference to the use of CIL receipts to fund education facilities. The policy should be amended to confirm that, if required, the construction of the new Secondary School would be funded by CIL and that the Council will also give consideration to a ‘payment in kind’ in accordance with CIL Regulation 73 (a process that allows the value of land to be offset against all, or part, of the CIL liability of a development). These are considered to be particularly relevant given that it is likely that land within the ownership of NELFT will be required to deliver the Secondary School.
17. On the basis of the foregoing, the approach adopted by the Council in relation to the Crossrail Corridor and specifically the King George and Goodmayes Hospital Development Opportunity Site is ‘generally’ considered sound. However, to ensure that the Local Plan is both effective and justified, further clarity is required in relation to the quantum and form of development, notably the secondary school, and the phasing of development.
18. In light of the aforementioned comments, the following revised wording for Policy LP1B, which has regard to The Schedule of Modifications to the Redbridge Local Plan (LBR 1.01.2), is suggested:

King George & Goodmayes Hospital

The Council expects a coordinated mixed use development to come forward at King George and Goodmayes Hospitals in accordance with the following criteria:

- *Land in and around King George and Goodmayes Hospitals will be delivered to provide around 500 high quality new homes (including affordable);*
- *Optimising densities compatible with local context, sustainable design principles and public transport capacity, in line with the Density Matrix of the London Plan;*
- *The conversion and reuse of non-designated historic assets will enable provision of new homes. This will include, where feasible and viable, the conversion of the former mental health asylum buildings;*
- *On site provision for a new secondary school, subject to feasibility and viability considerations, to be funded by CIL. The Council will consider payment in kind as a means of delivery;*
- *Permeable design – walkable neighbourhoods with routes and spaces defined by buildings and landscape;*
- *Enhanced open space provision, including the protection and enhancement of land designated as a Site of Importance for Nature Conservation;*
- *Improved east-west pedestrian and cycle routes to link the new neighbourhoods together;*
- *Development to be of the highest quality design, respecting the nature and character of the area;*
- *At Goodmayes development should maximise the opportunity to create a centrepiece for the new neighbourhood with opportunities to enhance the setting of the former mental health asylum;*
- *The provision for decentralised energy networks, subject to feasibility and viability. Any provision that is secured on this site must comply with policy LP29 in order to limit impacts on residential amenity.*
- *Development of this site should also comply with all other relevant policy requirements of this plan; and*
- *The development can be delivered in phases in the context of the Concept Masterplan prepared for the site.*

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

19. As detailed in the representation submitted on behalf of NELFT (R01087), work has been undertaken to demonstrate how the site can be delivered to provide 450-500 residential units as part of a mixed-use development having regard to various matters

including highways, flooding, trees, ecology, visual impact, residential amenity, heritage and social infrastructure (Refer to The Constraints Plan and Indicative Masterplan attached as Appendices to representation RO1087).

20. Whilst the site is within close proximity of the strategic road network and provides easy access to a range of bus services, the sustainability of the site, a large part of which constitutes previously developed land, will be significantly enhanced by the imminent opening of Crossrail. This will ensure that the site is within easy reach of a range of amenities by a range of modes of transport other than the private car. The Concept Masterplans Greenbelt Release Sites (LBR2.78) also highlights how the development of the site provides an opportunity to increase permeability across the site, connecting the site with existing and proposed infrastructure.
21. The suitability of the site and the contribution it can make to sustainable patterns of development is confirmed by the Redbridge Local Plan Sustainability Appraisal (LBR1.11.2).
22. On this basis, the approach adopted by the Council is considered sound.

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

23. As detailed above under question 4a (ii), the Green Belt Review Addendum (LBR 2.41.1) confirms that the King George and Goodmayes Hospital sites do not satisfy any of the 5 purposes of the Green Belt (paragraphs 3.17.4 to 3.17.8 of LBR 2.41.1) as identified at paragraph 80 of the NPPF. Accordingly, the release of the site from the Green Belt and identification as a Development Opportunity Site within the Crossrail Corridor Investment and Growth Area is fully in accordance with the NPPF and the Local Plan is, therefore, sound.

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

24. Draft Policy LP1B has been updated, as detailed within the Schedule of Modifications to Redbridge Local Plan (LBR 1.01.2), to recognise that the provision of a decentralised energy network will be subject to viability.
25. Whilst this approach is, in principle, supported, in order to ensure that the proposed policy is both justified and effective, it is requested that the policy reinstates reference to the provision of decentralised energy network also being subject to feasibility considerations.