

AECOM on Behalf of East Thames

**Hearing Statement for London Borough of Redbridge- Examination of Redbridge
Local Plan 2015-2030**

Response to Inspector's Issues and Questions

11th May, 2017

Inspector: David Smith BA (Hons) DMS MRTPI

Programme Officer: Andrea Copsey

**We are responding to Issue 4a, Crossrail Corridor- Policy LP1B, questions i) to v)
inclusive and question x).**

i) Is the Crossrail Corridor aptly named?

AECOM believes that the Crossrail Corridor is aptly named. By naming the area in this way, the Council are recognising the scale of the opportunity Crossrail offers for increasing the sustainability of new and existing development in this location, in line with London Plan Policy 2.8.

To maximise the opportunities available for new sustainable patterns of transport, the Council could commit to work with TfL to improve the quality of bus and cycle connections along Barley Lane as the main north-south connector between Goodmayes station and new development in the north of the Corridor. For example, the 387 bus route, which currently terminates at King George Hospital, could be extended northward along Billet Road to Marks Gate as part of the development of the Billet Road Site (see TfL's North East London Bus Map¹).

Such measures would relate well to the NPPF's aim of promoting sustainable transport and helping in the transition to a low carbon future.

¹ Available at <http://content.tfl.gov.uk/bus-route-maps/north-east-london-bus-map.pdf>

- 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)?**

This comprises three questions in one. We have answered them in order as a), b) and c) as follows in respect of the Billet Road site, within which our client has an interest.

a) AECOM considers that a site allocation at Billet Road would be justified, deliverable with regard to constraints and consistent with national policy.

Justified

In NPPF terms, the question is whether or not Green Belt release at Billet Road is 'the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence' and whether 'exceptional circumstances' exist to justify alteration to the Green Belt. AECOM considers that the answer to these questions is yes.

Redbridge have gathered substantial evidence, including from consultation, on the reasonable alternatives to Green Belt release, as is clear from the evidence base, particularly the Sustainability Appraisal (SA). This forms a powerful case for proportionate, targeted and limited Green Belt release at suitable locations.

The SA, alongside numerous Local Plan committee and cabinet reports to Councillors, demonstrates that Redbridge's planning officers and Councillors have performed their statutory duty contained in Section 39(2) of the Planning and Compulsory Purchase Act 2004 which places a duty on officers, Members (and Inspectors) to contribute to the achievement of sustainable development. The Green Belt alterations proposed are in alignment with the plan's vision, objectives and spatial strategy. This demonstrates officers and members have clearly followed Green Belt policy in the NPPF, including paragraph 84 (sustainable patterns of development), evidencing their consideration of how best to shape development to meet the needs of the 21st century in a Borough constrained by a Green Belt designated in the middle of the 20th century. Officers have justified the necessity for release of Green Belt based upon clear and reasoned planning judgements.

The London SHMA of 2013 indicates a need for 49,000 dwellings per annum across Greater London. On the supply side, the London SHLAA shows capacity in Redbridge for 18,774 homes including windfall. Both the SHMA and SHLAA were endorsed as robust at the Further Alterations to the London Plan (FALP) Examination in Public.

At Preferred Options Report Extension (PORE) consultation and subsequently, the Council investigated thoroughly alternatives to Green Belt release over and above the extensive brownfield development proposed, namely density increases at Goodmayes and in the Woodford-Wanstead corridor. Neither of these proved feasible. In any case, our PORE representation (URS on behalf of East Thames Group) considered that Green Belt release would be required to meet evidenced housing need even had both been implemented (see Pages 2-3) and this remained our position in our Regulation 19 consultation (AECOM for East Thames).

There continues to be strong evidence of exceptionally high housing need; the 2016 Outer North East London SHMA highlighted a need for 2,132 homes per year across Redbridge or 31,977 for the plan period.

The Mayor has not developed a coherent strategy to answer the question of where London's long-term and growing housing need could be accommodated, nor has there been any meaningful pan-London Green Belt review, leaving no alternative but for Boroughs to meet it through Local Plan Green Belt release. Redbridge has one of the highest housing needs and fastest-growing populations in the country, the Borough has successfully developed the majority of its brownfield land and densified where appropriate and in such a context where new development land is scarce, Green Belt release is fully justified. There are no reasonable alternatives.

Once the GLA chooses to develop a coherent, evidenced strategy in agreement with other local planning authorities for distributing London's housing need in appropriate locations across the South East of England beyond the Green Belt in line with its obligation to do so under NPPF paragraph 84, such an approach would form a 'reasonable alternative' to Green Belt release within Greater London.

However, until that time, London Boroughs are fully justified in releasing appropriately-located Green Belt land through their Local Plan process where they can demonstrate they have tested and exhausted the alternatives, as Redbridge does on pages 13-16 of its Duty to Co-Operate statement.

The GLA's statement at Regulation 19 Consultation that the draft Local Plan had not demonstrated exceptional circumstances to amend the Green Belt boundaries should therefore, in our view, carry very little weight.

The Government's Housing White Paper, published subsequently, carries some weight in signalling the potential for a more pragmatic approach to Green Belt in light of the significant housing shortage and thus undermines further the GLA's stated Green Belt position. We believe that the Council can evidence they have examined fully all reasonable options proposed in the White Paper for meeting their identified development requirements, including:

- making effective use of suitable brownfield sites and the opportunities offered by estate regeneration;
- the potential offered by land which is currently underused, including surplus public sector land where appropriate;
- optimising the proposed density of development; and
- exploring whether other authorities can help to meet some of the identified development requirement.

Deliverable

Our client's landholding at Billet Road is free from constraints, available and ready for development now. We understand this also to be the case for the other landholdings across the rest of the strategic site. Our Regulation 19 representation (pages 7-8), thus argued that it could be delivered in an earlier phase.

Though justifiable on the basis of national policy that the Council's proposed housing supply is mainly brownfield, these opportunities may be less deliverable than the

larger greenfield sites as they are small, fragmented, in multiple ownerships, and tend to have relatively more physical constraints.

Our Regulation 19 representation (pages 9-20) comprises a more detailed demonstration of the deliverability of our client's site, complementing the Council's own demonstration of viability (LBR 2.11).

Consistent with national policy

The question here is whether or not the 'exceptional circumstances' required by NPPF paragraph 83 exist to redraft Green Belt boundaries. AECOM's position is that they exist.

The first exceptional circumstance is the unprecedented and unsustainable level of housing need. However, we consider that housing need has only reached the level it has due to the repeated and increasingly unjustifiable failure to plan for, either in London or the South East, the housing supply to meet that need.

AECOM would therefore argue that the long-term failure on the part of both the GLA and national government to address the scale of that need through joint working with appropriate authorities beyond London now itself comprises a second exceptional circumstance over and above the housing need that already existed before it was exacerbated by the failure to deliver. We have set out evidence of the repeated long-term failure to plan for housing growth across London and the South East in our Manifesto for Long-Term Growth of the London City Region².

There is a need for new secondary schools across the Borough, serving existing as well as new residents, with demonstrably no suitable sites other than through Green Belt release. The Borough must also positively seek opportunities to meet the development needs of business and support an economy fit for the 21st century (NPPF paragraph 20), as well as providing sufficient land for social infrastructure to support new housing. This forms a third exceptional circumstance justifying Green Belt boundary revision.

b) AECOM considers that the detail about the Billet Road allocation is adequate in respect of use, form, scale, access and quantum of development

This is because the Council's proposals for the allocation of a residential-led development incorporating a school, open space and a community hub, alongside appropriate access points and an internal movement network are in line with our client's aspirations for their own land, as demonstrated in our previous representations, particularly pages 16-20 of our Regulation 19 representation.

c) AECOM considers that the Billet Road allocation provides the number of dwellings anticipated, having regard to the concept masterplans.

In our Regulation 19 representation (pages 18-19), we argued that the original dwelling capacity proposed at Billet Road of approximately 1100 was likely too high for the site's edge-of-town, suburban context. We made this argument, which we are pleased to note that the Council has now accepted, in order to ensure that the site's indicative density could be considered suitable and deliverable for its context.

² Available at http://www.aecom.com/wp-content/uploads/2015/10/AECOM_Cities_London_2065_Manifesto.pdf

As such, we strongly support the Council's aspiration to deliver 805 dwellings across the wider site, of which our client's site could deliver a minimum of 345 dwellings (page 19 of our Regulation 19 representation).

We note and support the Council's statement on Page 6 of their Concept Masterplans document that at this stage, there is no need to fix any of the development principles and instead it is envisioned that detailed masterplans or planning applications will be prepared by the developers/land owners following the adoption of the Local Plan.

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

AECOM considers that the development of the Billet Road site would promote a sustainable pattern of development in the terms required by the NPPF's paragraphs 84 and 85.

Dealing first with Paragraph 84, as per our answer to ii) above, through the SA, SHLAA work and much subsequent consultation, LB Redbridge have already demonstrated clearly that they have considered the 'consequences of channelling development towards the urban area inside the Green Belt boundary.', most recently in response to the GLA's questioning of the Council's approach in this regard (see LBR 2.06 Local Plan Appendix 1).

Paragraph 84's requirement to consider towns and villages inset within the Green Belt is not applicable in the Redbridge context. Finally, as per our answer to ii), the consideration of locations beyond the outer Green Belt boundary is, for London Boroughs, the responsibility of the GLA³ given the strategic nature of the Metropolitan Green Belt and the two-tier structure of planning in Greater London.

The Duty to Co-Operate Statement (February 2017) demonstrates that LB Redbridge has discharged its own responsibilities by consulting and co-operating fully with the GLA on Green Belt and Objectively Assessed Housing Need during Local Plan development, taking into account (paragraph 4.9) the GLA's view that London should be treated as a single housing market.

A sustainable pattern of development will also result in respect of the local and London Plan context. Releasing Billet Road for residential-led development will:

-support the regeneration of neighbouring Marks Gate, within the 20% most deprived LSOAs in London and as such one of the Mayor's Regeneration Areas (London Plan Policy 2.14- see also our PORE (pages 26-27) and Regulation 19 representations (page 7);

-support nearby Hainault Industrial Estate, zoned as a Strategic Industrial Location (Policy 2.17);

-support growth and development at Ilford Opportunity Area (Policy 2.13); and

-support the growth and development of Stratford as among the most important of the Mayor's Strategic Outer London Development Centres (Policy 2.16).

³ The Greater London Authority is, of course, for the purposes of the NPPF, a local planning authority.

Turning to paragraph 85, the table below sets out AECOM's view of how Green Belt release at Billet Road would meet the requirements of each bullet point.

NPPF Paragraph 85 bullet point	AECOM response in respect of Billet Road strategic site
Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development	This issue has been covered in depth in our representations and our answer to ii) above. It is considered on the basis of the evidence that Green Belt release is the only way in which the Local Plan strategy for meeting identified requirements for sustainable development can be achieved due to a lack of suitable land elsewhere.
Not include land which it is unnecessary to keep permanently open	It is not considered that any redrawn Green Belt boundary at Billet Road would lead to the inclusion of land within the Green Belt which it is unnecessary to keep permanently open.
Where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period	It is not considered, based on the evidence supporting the Local Plan, that there is a need to identify areas of 'safeguarded land' at Billet Road.
Make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development	Not applicable
Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period	It is considered that the extent of Green Belt land being released in response to evidenced housing and infrastructure need will not result in the need for boundaries to be altered at the end (i.e. <i>before</i> the end) of the development plan period.
Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent	The Billet Road site performs extremely well in this regard. All of its boundaries are defined clearly either by existing development or roads. Billet Road and Hainault Road both form recognisable, permanent physical boundaries between the site and the extensive Green Belt of Fairlop Plain to its north and west. Billet Road already performs this role to the north of Marks Gate, making the allocated site simply a logical western extension of existing development. There is more detail on this point in our PORE representation (pages 11-17).

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

We have already made it clear in both of the representations we have submitted to the Council that the Billet Road site does not meet any of the five purposes of the Green Belt in paragraph 80 of the NPPF.

To avoid repetition, please refer to pages 17-21 of our PORE representation and to pages 13-14 of our Regulation 19 representation, which between them provide a full explanation of why we consider the site meets none of the five purposes of the Green Belt in national policy. Our view on this issue remains unchanged since these original representations.

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

There have been six material changes in circumstances since Billet Road was originally designated as Green Belt.

The first material change is an extremely high level of housing need that it is not clear could be met elsewhere (see ii) above, PORE representation pages 2-3 and Regulation 19 representation page 4). Population data shows the level of need is far higher than at the time of Green Belt designation.

The second material change is a long-term failure to address housing need through an appropriate quantum of supply planned at regional or national level (see also ii) above). This failure has been explicitly referenced in recent Government announcements; for example, in November 2016, the Secretary of State Sajid Javid's view on the issue was that "the status quo is simply unsustainable...there's no point denying that successive governments, all the way back to the 1960s, have just not done enough".⁴

The third material change is an evidenced need for significant new education infrastructure in Redbridge for which suitable sites do not exist elsewhere (see ii) above).

The fourth material change is that development locally since Green Belt designation has eroded the Green Belt function of the Billet Road site. Historic mapping demonstrates convincingly that development south of Billet Road and east of Hainault Road has been widespread and sustained. See our PORE representation pages 6-10, in particular Figure 3 contrasted with Figure 6.

The fifth material change is the precedent set by Marks Gate in the 1960s-1980s, as confirmed by historic data and mapping. Land north of Eastern Avenue was removed from the Green Belt and developed in response to high levels of housing need. The proximity of the development and the similarity of circumstances mean Marks Gate should carry weight as a relevant precedent. (PORE representation page 6).

⁴ 'Building the Homes We Need' speech, available at <https://www.gov.uk/government/speeches/building-the-homes-we-need>

The sixth material change is the development of Crossrail and the consequent designation of the Crossrail Corridor; The London Plan (Policy 2.8) now requires boroughs to maximise the development opportunities supported by Crossrail.

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

AECOM can comment only on the Billet Road site.

We are aware that the Infrastructure Delivery Plan has identified, based on robust evidence of population growth, a need for exceptionally high secondary education provision across Redbridge (47 forms of entry), and the Council considers the site can accommodate an eight form of entry school. As such, we support the provision of a new school at the Billet Road site as we agree that the evidence shows that one is required.

Our willingness to help to deliver a new secondary school is further evidenced in our Statement of Common Ground. Should Billet Road be allocated for development, our client is ready, able and willing to start developing a master plan that would make appropriate provision for such a school once funding can be secured.

Provision of a school at Billet Road will also contribute towards growth, development and regeneration at appropriate locations in the local area, including Marks Gate (see iii) above).

(Total word count of AECOM text: 2,971)