

AECOM on Behalf of East Thames

Response to Hearing Statement submitted by Aldborough Hatch Defence Association to the Examination of Redbridge Local Plan 2015-2030

24th May, 2017

Inspector: David Smith BA (Hons) DMS MRTPI
Programme Officer: Andrea Copsey

Thank you for permitting AECOM on behalf of East Thames to respond to the Hearing Statement submitted by the Aldborough Hatch Defence Association (R01098).

AECOM have been granted permission to respond to R01098 because of its unusual nature. Unlike other Hearing Statements, including AECOM's own (R01104), it did not consist of an appropriately word-limited response to the Inspector's Issues and Questions (IED004), rather consisting of a 79- page document comprising three transport surveys.

This was permitted by the Inspector on the basis that ADHA had, in its Regulation 19 representation, referred to forthcoming transport data, and that in these circumstances, that data could form the ADHA Hearing Statement.

The ADHA Hearing Statement is therefore based entirely on the issue of transport and traffic. A detailed technical rebuttal of the transport and traffic assessment will be made on the Council's behalf by AECOM's transport department, who carried out the Local Plan Transport Assessment (LBR 2.50).

To avoid any perceived or actual conflict of interest, an internal 'Chinese Wall' was created between the AECOM transport department and AECOM's planning policy department at the point when the former were contracted by the Council to carry out the transport assessment (subsequent to our Regulation 19 representation).

It is, however, the planning policy team that is acting on behalf of East Thames in promoting the Billet Road site for development and that is submitting this Response. As such, it would not be appropriate for AECOM's transport department to input into this response and they have not done so.

Notwithstanding this, there are three key points in relation to R01104 to which the part of AECOM advising East Thames would like to draw the attention of the Inspector, as follows:

The first key point is to note the statement (bottom of Page 1) that 'the Billet Road site should not be put forward in the local Plan as a development site because of the long term problems with transport /traffic in the east of the borough'.

This is not consistent with the ADHA's previous Local Plan representations, within which the ADHA pointed to a wide variety of other reasons why, in their view, the site

should not be allocated. ADHA have also in the past submitted arguments against gravel extraction at Billet Road and elsewhere (see COM001 and GEN147).

This all combines to indicate that ADHA in fact oppose the Billet Road allocation for exactly the same overarching reason as they have opposed much other nearby proposed development: namely, because it is located in their local area. This does not comprise consistent or valid planning grounds for opposing the Billet Road allocation.

Secondly, and related to the first point, there is an unremittingly local focus to R01104 and indeed previous ADHA representations. As such, all of the objections to development are absolute rather than relative. Positive suggestions for how/where the Borough's extremely high level of housing need could be met, if not at Billet Road, are conspicuously absent. For the same reason, the performance of land at Billet Road in terms of suitability for development relative to other locations, whether in transport or other terms, has not been addressed.

For example, even in the highly unlikely event that the R01104 transport assessment is considered accurate by all parties, it may still be the case that the transport impacts at Billet Road are more acceptable than the traffic and transport impacts of other comparable alternative locations. Without a full, relative assessment, it is not possible to make such a judgement, and this is why the Council's own suite of transport assessments (LBR 2.50-2.54), which do indeed comprise comprehensive, relative assessments of suitability, should be considered more robust than R01104, which includes no assessment of relative suitability whatsoever.

For this reason, the weight that should be attached to this and the previous ADHA representations that also fail to demonstrate relative suitability or otherwise for development should be limited.

As a final point, R01104 was drafted by transport advisors DCA Monisyst on behalf of ADHA. DCA Monisyst appear to be based at Willow Farm, Billet Road- in other words within the proposed allocation site. As such, development at Billet Road for residential use forms an existential threat to their business. DCA Monisyst therefore has a vested operational interest in the development not proceeding.

Given this, this assessment simply cannot be considered unbiased or impartial.

ADHA could presumably have chosen any independent transport consultant to carry out this study. By selecting probably the only consultant whose business would be threatened by the allocation, it is difficult to avoid the perception that the negative conclusion of the traffic and transport assessment was determined well in advance of the survey being carried out.

Again, this should be seen to significantly limit the weight that can be attached to it.