

Development, Enterprise and Environment

Ciara Whelehan

Planning Policy Manager
London Borough of Redbridge
Redbridge Town Hall
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Our ref: LDF26LDD15/BS

Date: 17 November 2017

Dear Ciara,

**Planning and Compulsory Purchase Act 2004 (as amended);
Greater London Authority Acts 1999 and 2007;
Town and Country Planning (Local Development) (England) Regulations 2012**

Re: Redbridge Local Plan 2015 – 2030 Proposed Main Modifications

Thank you for consulting the Mayor on the proposed main modifications to the Redbridge draft Local Plan 2015 – 2030. As you are aware, all development plan documents must be in general conformity with the London Plan under section 24 (1) (b) of the Planning and Compulsory Purchase Act 2004. The Mayor provided comments on the Submission version of the draft Redbridge Plan on 11 October 2016 (reference: LDF26LDD15/BS).

The Mayor has carefully considered the proposed main modifications and is of the opinion that the proposed de-designation of two strategic sites located within Green Belt (King George and Goodmayes Hospitals and Land at Billet Road) are not in conformity with the London Plan. The Mayor has afforded me delegated authority to make more detailed comments on his behalf as set out below.

Key Issue – housing

The Mayor welcomes the review of the borough's Site Allocations, however he is concerned about the decrease in the proposed housing supply figure. Although the borough is still meeting its housing supply target set out in the London Plan, the proposed amendment to the housing figure means the gap has increased between its identified housing capacity and need. The borough has recently been inputting data into the London SHLAA in order to find additional capacity for housing without reliance on the Green Belt. This exercise will inform its housing target to be included the new London Plan. Redbridge should assure itself that it has explored all options for housing supply in order to reduce the gap between need and supply. It is noted that the supply capacity falls significantly in the last phase (years 11-15) of the housing trajectory. The Mayor recommends Redbridge commit to an early review of the plan following its adoption to find additional supply beyond 10 years and to take into account the new housing targets which will be published at the end of November 2017.

Key Issue – de-designation of Green Belt land

The Mayor objects to the de-designation of King George and Goodmayes Hospital Site and Land at Billet Road Site from the Green Belt.

Billet Road

Of all the sites proposed for de-designation from Green Belt in the Redbridge Local Plan Submission document, Land at Billet Road Site meets the most tests for Green Belt. Paragraph 4.62 of the Redbridge Green Belt Review January 2016 (LBR 241) sets out the findings of the 2013 Green Belt Review which says that the Billet Road site fulfils Green Belt purposes and in particular “does to a limited extent prevent urban sprawl from the housing to the east and it prevents the merging of development in Barking and Dagenham with development in Redbridge. The release of the site would isolate areas of GB14 to the south of the site from the wider Green Belt”. The 2013 Review recommends that the “site be retained in the Green Belt and that it is not sub-divided (paragraph 4.6.3). The Mayor’s concurs with 2013 Review and is of the opinion that Billet Road meets the following Green Belt purposes listed in paragraph 80 of the NPPF:

- To check unrestricted sprawl of large built-up areas
- To prevent neighbouring towns merging into one another
- To assist in safeguarding the countryside from encroachment

The Redbridge 2015 Green Belt Review Addendum provides a different assessment of the Billet Road site even though none of the physical characteristics of the site or surrounding land have changed. Table 5.2 Summary of the 2015 Green Belt Review Addendum in the 2016 Green Belt Review recommends in the first column that the site should not be released from the Green Belt or sub-divided. However, the second column recommends that the site should be released from the Green Belt and that the boundary be amended to extend along Billet Road to the junction with Hainault Road. It is the Mayor’s opinion that no compelling evidence has been provided for the site to be released from the Green Belt and he therefore objects to MM61, paragraph 6.1.8 which makes reference to Billet Road as a site identified as a Development Opportunity Site in Appendix 1.

King George and Goodmayes Hospitals

The Mayor objects to the de-designation of the above site from Green Belt Land as detailed in the representation made at the submission stage of the plan (letter dated 11 October 2016). At that time, the Mayor stated that a significant portion of the site could be justified for Green Belt release, but felt that in advance of a comprehensive masterplan or framework, any release of Green Belt would be premature. Redbridge has provided a concept masterplan for the site which shows a significant amount of development proposed beyond the previously developed footprint. The Mayor urges Redbridge to produce a detailed masterplan for the site and consider whether the land meets the tests for designation as Metropolitan Open Land. This will ensure that open space is afforded the highest possible protection from inappropriate development and that a proactive approach is taken to addressing Redbridge’s identified open space deficiency.

Responses to proposed main modifications

Modification Number	Mayor’s response
MM5	Object to lower housing numbers (see Key Issue – housing, above) Support the inclusion of a new Cultural Quarter in Ilford.
MM6	Support higher housing numbers but see Key Issue – housing, above.

MM7	Object, see Key Issue – de-designation of Green Belt land, above
MM8	Support removal of The Ford Sports Ground Policy
MM9	Object to inclusion of Land at Billet Road and lower housing number (see Key Issue – housing and Key Issue – de-designation of Green Belt land, above)
MM11	Object to lower housing number – see Key Issue – housing, above
MM15	Object to lower housing number – see Key Issue – housing, above
MM16 & MM17	Support the removal of Oakfield as a site for development
MM19	Object to the lower housing target and query the loss of capacity. The Mayor’s recent SHLAA exercise show Redbridge has increased capacity to meet and exceed the 2013 SHLAA (see Key Issue – housing, above).
MM23 & MM24	Support the change to the affordable housing policy to include a minimum strategic affordable housing target of 35% which is in line with the Mayor’s Affordable Housing and Viability SPG (as per the GLA and Council’s Statement of Common Ground). Support the approach to affordable housing and reference to the Mayor’s Affordable Housing and Viability SPG. It should be noted that the SPG is dated 2017 and not 2016 (as per the GLA and Council’s Statement of Common Ground).
MM25 & MM26	Support the new section on Student Accommodation made in response to the GLA and Council’s Statement of Common Ground).
MM31	Like Chadwell Heath, Green Lane District Centre is partly located within the London Borough of Barking and Dagenham. For consistency, it would be useful to add <u>(part)</u> after Green Lane in bullet point ii).
MM41	Support the proposed amendments and welcome the reference to London Plan policy 5.2
MM42	Feel wording could be clearer. Add the word ‘turbine’ after ‘wind’ and ‘therefore’ after ‘that could compromise’.
MM44	Delete ‘possible’ before ‘overall’ (grammar)
MM48	Support the references to the London Plan minimum and maximum parking standards in place of Appendix 7.
MM49 & MM50	Support the proposed additions to the supporting text on air pollution and air quality and to Policy LP24.
MM53 & MM54	Support amendments to the tall buildings policy and references to London Plan Policy 7.7
MM59	Support the reference to the London Plan

MM61	Object to the identification of King George and Goodmayes Hospitals and Billet Road as Development Opportunity Sites in Appendix 1 (see Key Issue – de-designation of Green Belt land, above).
MM72	Support the amendment to include the requirement for masterplans for key strategic sites, particularly for the King George and Goodmayes Hospital Site (see Key Issue
MM74	Comment – there was no indication in Appendix 1 of amendments to the sites. A tracked change document would have been useful.

If you would like to discuss any of my representations in more detail, please contact Brianne Stolper [REDACTED] who will be happy to discuss any of the issues raised.

Yours sincerely,



Juliemma McLoughlin
Chief Planner

cc Keith Prince, London Assembly Constituency Member
Nicky Gavron, Chair of London Assembly Planning Committee
National Planning Casework Unit, DCLG
Lucinda Turner, TfL