

1.
MAJOR MODIFICATIONS TO THE BOROUGH PLAN K1 PAGE
CROSS RAIL CORRIDOR INVESTMENT GROWTH
AREA (IGA) NOVEMBER 2017

MN5/MN6

ON BEHALF OF THE LONDON GREEN BELT COUNCIL, I
WISH TO MAKE THE FOLLOWING OBJECTIONS (COMMENTS TO
THE MAJOR MODIFICATION FOLLOWING THE NOVEMBER
BUDGET AND THE PRESERVATION OF FORDS SPORTS GROUND.
IN RESPECT OF FORDS PRESUMABLY ANY MAJOR RESIDENTIAL
OR RETAIL USE WOULD NOW BE BLOCKED, AND THEREFORE THERE
IS A COMPELLING CASE FOR THE BOUNDARIES OF THIS IGA TO
BE REDRAWN ESPECIALLY NORTH OF MEANSLANDS WHICH AREA
IS CLOSER TO NEWBURY PARK ESPECIALLY THERE IS NO DIRECT
ROUTE BETWEEN SEVEN KINGS & GOOD MANES AND THE CENTRAL
LINE.

IN OUR VIEW THE SAME CORRIDOR SHOULD BE SHUNK ALSO
TO EXCLUDE THE GOOD MANES HOSPITAL PLAYING FIELDS ALSO
SINCE THEY MEET ON SEVERAL GROUNDS TO PRESERVE
THEIR GREEN BELT STATUS ESPECIALLY AS THERE IS A LISTED
SITE, DOZENS OF TREE PRESERVATION ORDERS, AND THE FACT
SEVEN KINGS WATER IS ALREADY PROTECTED BY ITS BLUE
RIBBON STATUS. IN ADDITION THE 2017 BUDGET HAS REVEALED
A SHARP AND ONGOING DECLINE IN ECONOMIC GROWTH. AND
THEREFORE IF ORA RETAIL FLOOR SPACE SHOULD REVERT TO
20,000 SQUARE METRES (P LUS 3000000) PLUS JUST 10K NEW RETAIL
IN THE CROSSRAIL CORRIDOR RED BRIDGE NOW ACCEPTS IT HAS
A 5 YEAR HOUSING SUPPLY (IN OUR VIEW A 10 YR SUPPLY.)

ASSUMING BOTH FORDS SPORTS GROUND AND GOOD MANES
HOSPITAL BOTH PRESERVED ONLY 3,500 HOMES IN CURRENT EXTENSION
SHOULD BE BUILT ESPECIALLY IF BARKING RIVERAINS HAS MANY
AFFORDABLE HOMES IN RESPECT OF PG MNG. ONLY 1 NEW
SECONDARY SCHOOL IS NEEDED ESPECIALLY IF PART OF THE
GOOD MANES HOSPITAL IS CONVERTED INTO A GYM FORM, AND

AN EXISTING HOME ON SITE IS CONVERTED INTO A HEALTH FACILITY. IF KING GEORGE'S HOSPITAL MUCH MORE URBAN IN CHARACTER IS RE-LEASED FROM THE GREENBELT SOME HOUSING COULD BE BUILT ADJOINING THE A12 BUT EXCLUDING THE EXISTING HAPPY VALLEY IN THE DIRECTION OF BILLET ROAD

IN REGARD TO PARAS 3.4.10 & 3.4.11 WITHOUT RAIL FREIGHT FACILITIES OR DIRECT LINKS IN TERMS OF BUSSES WITH CROSSRAIL & NEWBURY PARK, AND THE LATEST POSE BUDGET PROJECTIONS GROWTH IN THIS AREA WILL CONTINUE TO BE LIMITED SINCE NEW BURY PARK AND THE CENTRAL LINE ARE SITUATED MUCH NEARER THAN CROSSRAIL. WITHOUT VIRTUALLY ANY MAJOR INFRASTRUCTURE INCOME OTHER THAN CROSSRAIL (NOW c. 90% COMPLETE) AND THE SHARP DECLINE IN RESPECT OF INCOME OUR REVIEW REMAINS THAT ONLY A SMALLER CORRIDOR WITHOUT LARGE J-PAV BUILDINGS EXCEPT ALONG THE HIGH ROAD ITSELF IS AT ALL JUSTIFIED, ESPECIALLY AS THE HOUSING TARGET HAS BEEN REVISED DOWNWARDS MODESTLY - A MORE ATTAINABLE TARGET WOULD IN OUR VIEW BE UNDER 15 K OVER A15 URBAN REGION UNTIL 2032.

AS THE NEW DRAFT LONDON PLAN WILL CONFIRM THE ONGOING NEED TO PROTECT THE CAPITAL'S GREEN BELT.

MAJOR MODIFICATIONS AND SEVERE RESERVATIONS BY THE LONDON GREEN BELT COUNCIL PARTICULAR IN RESPECT OF THE REDEVELOPED GOOD MAYES HOSPITAL PROPOSALS. DURING THE INSPECTOR'S PUBLIC EXAMINATION WE ADVOCATED IN RESPECT OF POLICY 1.8A THAT THE KING GEORGE HOSPITAL SITES SHOULD BE TREATED AS DIFFERENT ESPECIALLY AS THEY ARE UNDER SEPARATE TRUSTS WHICH COMPLETED AT THE HEARINGS RE-DEVELOPMENT WOULD PROCEED ON DIFFERENT TIMESCALES. MOREOVER, CONTRARY TO ESTABLISHED GREEN BELT PRINCIPLES THE LARGE DISTRICT HOSPITAL, ITS AUXILIARY BUILDINGS AND NURSING ACCOMMODATION STANDS ON FORMER GREEN BELT. BY SHARP CONTRAST GOOD MAYES HOSPITAL (NOT DUE TO CLOSE UNTIL 2019) WAS BUILT WELL BEFORE THE REVIEW OF THE GREEN BELT.

UNLIKE OTHER PARTNERS RED BRIDGE HAS NOT SOUGHT TO ESTABLISH ANY COMMON GROUND WITH THE LONDON GREEN BELT COUNCIL, AND BOTH NELYDOR BURTON HAVE NOT SOUGHT PUBLIC CONSULT^{ATION} IN REGARD TO THE BOROUGH'S LOCAL PLAN WE UNDERSTAND THE INSPECTOR HAS STILL TO MAKE A FINAL DECISION IN RELATION TO OTHER GREEN BELT SITES SUCH AS GOOD MAYES AND BILLET ROAD THOUGH THIS ESSENTIAL POINT IS NOT REFERRED TO DIRECTLY IN THE LIST OF MAJOR MODIFICATIONS. THERE IS DIRECT REFERENCE TO THE CONSIDERABLE CONSTRAINTS RELATING ESPECIALLY TO THE GOOD MAYES HOSPITAL SITE LISTED PARTICULARLY ON PAGE 9 (P. 7) WHICH DO NOT APPLY TO KING GEORGE'S, AND IN THE PAST THE FOOTPRINT OF AN EXISTING HOSPITAL HAS BEEN TREATED DIFFERENTLY TO ITS PLAYING FIELDS (UNDER DIFFERENT OWNERSHIPS) (IN RESPECT OF THE ASYLUM BUILDINGS WHICH HAS BARS BE CONVERTED TO EDUCATIONAL / HEALTH FACILITIES (PAGES 7 & 8). WE WELCOME THE OPEN SPACE PROVIDED AND AN IMMANENT SENSE. HOWEVER GOOD MAYES HOSPITAL SITE IS TOO SMALL TO ACCOMMODATE 500 NEW HOMES UNLESS THE SITE LOCATED ON BROWNFIELD SITES AND / OR TO THE NORTH OF KING GEORGE'S IN THE VICINITY OF THE A12 WHICH HAS DIRECT

MM 7

SUBJECT BUS LINES TO NEWBURY PARK AND THE CENTRAL LINE
 INTERMS OF AN INCREASED TRANSPORT CAPACITY (PAGE 7) THERE
 SHOULD BE A DIRECT BUS LINE TO (FROM NEWBURY PARK STATION)
 VIA ALD BROUGH ROAD AND GOODMAYES HIGH ROAD, WITHOUT THE
 BULK OF HOUSING (LARGELY WAREHOUSES) LOCATED ELSEWHERE THE GOOD-
 MAYES HOSPITAL SITE IS SIMPLY TOO SMALL FOR ^{NEW SPAN AND BLONE} A SECONDARY SCHOOL AS
 OPPOSED TO A GYM FORN FROM CHANELL WORTH USING THE EXISTING PLAYING
 FIELD UNDER ITS PRESENT OWNERSHIP.

ADJACENT TO ITS LARGE SCHOOL SITE PARKMAN GREEN PRIMARY
 HAS ITS OWN PLAYING FIELDS ON EXISTING GREENBELT. IN ADDITION TO THE
 EAST OF THE GOODMAYES HOSPITAL IS THE VERY WELL ESTABLISHED BARLEY LANE
 IN CLOSE PROXIMITY TO NHS YOUTH MENTAL HEALTH CENTRE. THE ABOVE
 PROPOSALS WOULD ALSO FACILITATE (BULLET POINT 6 ON PAGE 8) "ENHANCED
 OPEN SPACE PROVISION... DESIGNATED AS A SITE OF IMPORTANCE FOR
 NATURE CONSERVATION. PLEASE ADD (BOROUGH GRADE 1) LIKE THE
 LONDON CREE AND OTHER ENVIRONMENTAL GROUPS I CANNOT SEE HOW THE
 EXISTING GOODMAYES HOSPITAL OPEN SPACE (SINCE CAN POSSIBLY BE
 ENHANCED IF IT IS TAKEN IN SUBSTANTIALLY BY A LARGE SECONDARY
 SECONDARY SCHOOL, AND A NEW HEALTH HUB UNLESS THE LATTER IS
 SITUATED ON THE KING HOSPITAL (KEH) SITE. THEREFORE WE ADVOCATE
 MM 7 IS REVISED TO ONLY BULLET POINT 1. PAGE 7 IS DELETED UNLESS
 TRANSPOSED TO A SEPARATE KEH POLICY BOX - AT THE END OF THE HEARIN
 IN JULY 17 BRARY EXHIBITED SUCH PROPOSALS WITHOUT ANY PRIOR PUBLIC
 CONSULTATION. SIMILARLY ON THE FOLLOWING PAGE 8. THE SECONDARY
 SCHOOL PROPOSAL BE DELETED WHILE THE NEW HEALTH HUB BE SITUATED
 POSSIBLY IN THE EXISTING ASYLUM BUILDINGS

IN REGARD TO BULLET POINT 7 WE SUGGEST REWORDING UTILISING
 PROPER SPELLING TO READ "CREATE AN ICONIC CENTRE PIECE (MASTERPIECE
 FOR THE SURROUNDING NEIGHBOURHOODS WITH EXTENSIVE COMMUNITY AND
 CULTURAL FACILITIES" (PAGE 8). WHILE BULLET POINT 8 SHOULD BE
 REWORDED AT PM TO READ "2 PLANNING BRIEFS FOR KEH AND GOODMAYES HOSPITAL

NMT

SINCE THE KING GEORGE SITE ESPECIALLY TO ITS NORTH IS MUCH MORE URBANISED, ~~AND THEREFORE~~ ^{THE} KING GEORGE HOSPITAL SITE WHICH INSIDE OF SUPPOSED GREEN BELT PROTECTION HAS A LARGE DISTRICT HOSPITAL AND NURSING ACADEMY. IT SHOULD BE TREATED DIFFERENTLY WITH ITS NEAR NEIGHBOUR GOOD MAYES HOSPITAL. HIS APPOINTMENT RED BRIDGE COUNCIL HAS NOT IDENTIFIED ANY NEW METROPOLITAN OPEN SPACE (NOW) OR A GREEN BELT SHOP. MOREOVER NO RE PROVISION PLANS FOR THE EXISTING PITCHES AT GOOD MAYES.

FOR THE FOLLOWING REASONS A SEPARATE POLICY BOX IS BEING INSPIRED TO BE PLACED THE FORDS SPORTS GROUND FOR WITHOUT COMPREHENSIVE GREEN BELT PROTECTION A STANDARD GOOD MAYES HOSPITAL SITE WOULD BE EXTREMELY VULNERABLE TO COMPREHENSIVE HOUSING DEVELOPMENT.

1. GOOD MAYES HOSPITAL SHARES WITH FORDS THE VERY IMPORTANT ECOLOGICALLY THE UNUSUAL SEVEN KINGS WATER WITH ITS OWN RISK.
2. IT INCLUDES A GRADE 1 SINC OF RED BRIDGE-WIDE SIGNIFICANCE. THE MORE SO THE SINC ADJOINING THE RAILWAY ESPECIALLY AT GOOD MAYES STATION HAS BECOME A VIRTUAL BUSINESS YARD. THE QUALITY OF SINCS SHOULD BE ASSESSED BEFORE ANY DEVELOPMENT.
3. THE RETENTION OF THE GOOD MAYES PLAYING FIELDS AND THE WATER COURSE WILL ENABLE THE COUNCIL TO OFFSET A NEAR AREA OF OPEN SPACE DEFICIENCY, AND WITH FEWER HOUSES RED BRIDGE WITH NOT FALL SO FAR BEHIND ITS OWN STANDARDS AS PER ITS OWN OPEN SPACE STUDY. (AS PER N162 PAGE 85) WE DO NOT SEE THIS MAJOR SHORTFALL CAN BE OFFSET BY "POCKET PARKS" OR BY FINANCIAL CONTRIBUTIONS ETC. OTHER WISE THE COUNCIL IS AHEAD OF THE HOUSING

MM7

could well be reduced to virtually negligible proportions

especially if there are so many high quality family homes

4. Goodnaves Hospital site is surrounded by dozens of trees with y pgs. with a rich bio-diversity of bird and plant life including herons, owls & pheasants

5. These grounds also incorporate 2 sets of playing fields belonging to Farnham Green Primary School and Chadwell Heath Academy with no provision planned if they are developed.

6. In addition to the Barley Lane allotments much of the Brass Lane has not been intensely cultivated for several decades

7. ^{especially} in conclusion if public access to a 12 km or seven kms water looped up (via the happy valley) there are at least 6 major reasons (compared to the roads sports ground why Goodnaves should be treated as a prime runner to preserve its protected green belt status, and its associated s inc

With the attention of Oakfields and even more so for sports ground the planning inspector has already undermined many of the conclusions of Mr Bridge's "Independent" reports ranging from Colin Buchanan and Wardell Associates which have never been put out to public consultation. Moreover the Inspectorate / Redbridge Council should also take into account the loss of open space / green belt at 5 Oaks Lane where no less than 400 homes are being built, and less than 10-15 years ago Chadwell Heath Hospital has also been built over with basic flats, and small homes.

MAJOR MODIFICATIONS TO THE LOCAL PLAN.

AFFORDABLE HOUSING WK 23.

THE LONDON GREEN BELT COUNCIL WELCOMES THE INCREASE OF AFFORDABLE HOUSING IN RED BRIDGE TO 35% INSTEAD OF THE PALTRY 30% OR JUST 336 HOMES P.A. HOWEVER, WITHOUT INCREASED BORROWING ALLOWED ON A SUBSTANTIAL SCALE FOR COUNCIL / PUBLIC SECTOR RENTED HOUSING RED BRIDGE IS UNLIKELY TO ACHIEVE EVEN THIS MODEST INCREASE. IT IS MY VIEW AND THAT OF MANY ENVIRONMENTAL GROUPS THERE IS NO JUSTIFICATION FOR DESTROYING PRECIOUS GREEN BELT AND OTHER IRREPLACEABLE OPEN SPACE UNLESS THERE ARE TRULY EXCEPTIONAL CIRCUMSTANCES, AND THE UNDERPINNING IS RADICALLY CHANGED SO PARA 3.95 IS REVISED TO READ A HOUSING DELIVERY TARGET OF AT LEAST 450 HOMES PER YEAR OR AT LEAST 6700 UNITS OVER A 15 YEAR PERIOD (STARTING IN 2018). THIS HIGHER FIGURE WOULD ALSO ADDRESS THE CURRENT SHORTFALL OF OVER 700 AFFORDABLE HOMES, AND A TOTALLY UNACCEPTABLE DELIVERY OUTCOME CURRENTLY OF JUST 8% WHICH AMPLY DEMONSTRATES THAT EVEN IN OUTER LONDON THE PRIVATE SECTOR HOUSING MARKET HAS FAILED TO DELIVER OVER THE LAST DECADE OR SO. MOREOVER SINCE 2012 JUST OVER 2,400 HOMES HAVE BEEN BUILT SO THE NEW TARGETS ARE:

THE REVISED LOCAL PLAN ENVISAGES OVER 9,000 HOMES BEING BUILT IN JUST 5 YEARS EVEN THOUGH ECONOMISTS ARE NOW PREDICTING A SHARP DECLINE IN ECONOMIC GROWTH AND PERSONAL INCOMES FALLING BEHIND INFLATION FOR THE NEXT 10 YEARS OR SO. THE ABOVE TARGETS IN MY VIEW WILL ONLY BE REALISTICALLY ACHIEVED IF THEY INCLUDE BED ROOM / GARAGE CONVERSIONS, AND OUT OF BOROUGH LARGE-SCALE HOUSING GROWTH.

MM50

AIR POLLUTION MM50 PAGE 59.

FOLLOWING THE SUPREME COURT RULING MM50 NEEDS TO BE REVISED FOR ALL MAJOR NEW DEVELOPMENT SHOULD BE BETTER DEFINED AS INCLUDING ALL MAJOR DEVELOPMENT IN CLAUSE A AS MEANING OVER 10,000 RETAIL FLOOR SPACE OR OVER 100 HOMES TO BE AT LEAST AIR QUALITY NEUTRAL. UNDER CLAUSE II POOR AIR QUALITY AREA SHOULD BE EXPANDED TO INCLUDE ALL THE A12 EASTERN APPROACH FROM BEN BRIDGE TO TWENTY / BARLEY LAKE / LAIN AULTRONWYER REWARDS

MM 61.

6.1.7^{1/2}

GREEN BELT REVIEWS TO THE SOUTH OF THE A12 UNDER PARA 6.1.7 WE DO NOT ACCEPT THE CONCLUSIONS OF THESE REVIEWS, AND WITH THE REMOVAL OF FORDS FOR ALL THE ABOVE REASONS THERE IS A COMPELLING CASE FOR PARCEL GB16 TO BE SPLIT BETWEEN KGH AND GOODMAIES HOSPITAL

6.1.8 INSPECTION LB RED BRIDGE AND DEVELOPMENTS SUCH AS BARLING RIVERSIDE AND RBS FURBY TH NOW HAS BEEN ESTABLISHED THE COUNCIL HAS SUFFICIENT BROWNFIELD SITES (AT WELL OVER 200) TO MEET ITS HOUSING NEEDS FOR THE NEXT 10 YEARS ESPECIALLY IF BEDROOM / GARAGE EXTENSIONS AS PER LP30 ARE TAKEN FULLY INTO CONSIDERATION AT c 1000 EXTENSIONS PER YEAR ARE EASILY (AND CONSISTENTLY) OUSTRIPPING TO JUST c 500 NEW HOUSES PER ANNUAL