

## ISSUE 10 MANAGING AND ENHANCING THE BOROUGH'S ASSETS IN SECTION 6

Since c2000 L.B Redbridge has consistently respected and valued the existing Green Belt but suddenly without any prior consultation with Area Committees or the Sustainability Forum or the general public the Council appointed Colin Buchanan c 2010 the well known traffic engineers to review partially in our view the Green Belt in Redbridge. Significantly, in advance of at least 2 revisions of the Brownfield Sites in 2014 and again in 2016-7 Colin Buchanan then Wardell Armstrong both concluded prematurely that there were insufficient brownfield sites for housing in Redbridge even though according to my calculations the borough already has 7-8 years housing supply and since the Council has added Billet Road to the list in addition to c 15% more brownfield housing sites with the rapid closure of many independent pubs and garages/filling stations .

In the last 10 years we are only aware of 2 Green Belt sites being released for development King Georges Hospital ( KGH ) and 5 Oaks Lane where no less 400 houses are currently being built with very little infrastructure provided in spite of its distance from tube stations. The NPPF refers to exceptional circumstances and boundary changes which may well apply to the footprint of the existing Victorian Hospital built well before the 1938 Green Belt Act. By sharp contrast the Council is now intending to dispose of no less than 7 Green Belt sites in spite of Policy 34, Policy 35 and the representations by Oakfields, London Wildlife Trust, London CPRE London Green Belt Council and The London Mayor whose office declared the Redbridge Plan is incompatible with the London Plan.

Since the Council has agreed to several modifications submitted by the London Wildlife Trust especially in respect of the Goodmayes Hospital site and Fords and in view of the Supreme Court ruling on urgent action to improve Air Quality we *wish* to stress the importance of enhancing the Borough's biodiversity particularly in respect of SINCS and the invaluable Seven Kings water. In addition to these factors Goodmayes Hospital should be regarded as an important heritage asset as outside Ilford there are few historic building south of the A 12.

In respect of this hospital site the submission by Ingleton Wood LLP SEPT 2016<sup>1</sup> the consultants to the Mental Health Trust revealed from a 2015 ecological survey that there was a well established colony of bats (A PROTECTED SPECIES) in the main hospital buildings, Another reason why the Local Plan should

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<sup>1</sup> APPENDIX 1 PAGE 11 & PETER BRETT TRAFFIC/ HOUSING SURVEY PARAS 2.3 AND 2.4

following our suggested amendments and the modifications following the London Wildlife Plan adopted by the Council prioritise biodiversity especially in the south of the borough.

Well after the closing date for our submissions in September 2016 both the Council and Wardell Armstrong in 2017 produced 2 key documents which could well have far reaching bearings on the ecological value of both Fords and the Goodmayes hospital sites in regard to "inappropriate development". One of the main changes in the Redbridge Concept Master Plan Feb 2017 is in line with modification 150 p129 which we support for it appears to advocate the whole of the hospital site is designated as a SINC Grade 1 a very important factor especially if the Goodmayes site loses its Green Belt status and the huge Crossrail Corridor IGA remains in place for it is difficult to envisage how this important nature conservation site would survive in tact in the middle of a major Growth and *Investment area*. Moreover, reports like the 2017 Wardell Armstrong overlooked inexplicably 2 schools have c3 playing pitches well established on this Hospital site and especially for primary school children Goodmayes Park extension would be too far to travel regularly and contrary perhaps to the principle of their welfare being paramount. This being the case we feel strongly a standalone secondary school on Fords would constitute in appropriate development ; instead a medium/large site should be reserved for additional playing pitches on Fords or even on Seven Kings Park to accommodate those forced to leave the Hospital site.

10 ii From the above 2017 reports it is far from clear whether or not the existing Barley Lane allotments at Goodmayes can stay put for they are certainly needed especially as under 6.3.4 p129 Redbridge Local Plan demand is increasing in line with the rising population, and as they are situated on Green Belt with no re-provision plans it seems the presumption must be against any development on this key southern site, LP 36 is amended under para a) resisting development on allotments **especially in the south of the borough adjoining an area of open space deficiency and no less than c.150 TPOs**. In June 2017 Redbridge Council has announced that in conjunction with Trees for Cities it has secured a 3 year partnership through CIL funding—hopefully the south of the Borough will be prioritised though there is still no news about funding for other aspects of the huge Crossrail IGA infrastructure.

In terms of open space deficiency there is no simple answer for if Fords and Goodmayes are both built upon in all probability the whole area south of the

A12 will become 1 mega area of space deficiency, and the simpler solution is for all the above reasons at least 1 if not both sites remain Green Belt with only limited development confined to Goodmayes Hospital itself. In our view there are several substantial recent reasons to treat Goodmayes differently from KGH for the latter is now primarily a SINC site with 2 school playing fields but no reprovision plans and doubts if the 30 playing pitches can be accommodated on the Goodmayes Park extension which currently has plenty of access to the general public for informal recreation. About 3-4 years ago there was considerable opposition to a scheme for an Asian sports club to take over virtually the whole of the extension in return for a peppercorn rent for c.99 years. Since the extension is essential under the Council's reprovision plans to accommodate the Fords sports clubs etc we are recommending the Park Extension with GLA support becomes under the Local Plan p169 given enhanced protection by being assigned possibly with Goodmayes Park itself MOL or Green Belt status under the 1938 Act. Wherein Appendix 3 Monitoring Framework p169 also asserts under LP 34-40 optimistically that there should be no net loss of SINC's but the Council has not identified apparently any alternative sites as per existing playing fields at Goodmayes. Since the Council has the extremely ambitious target of no net loss of Green Belt If as Redbridge intends to dispose of no less than 6 other Green Belt sites LP 35 would become largely meaningless rhetoric which is why under ii the word **quantity** should be inserted to include the irreplaceable Green Belt if it is lost especially as the Council refers to acquiring new ( protected? ) Open Space. ( Para 6.1.10 ). If both Fords and Goodmayes/KGH sites are lost the only other sound option would be to extend South Kings Park northwards at least to the south of the proposed A12 link road p17 and to the secondary school site which should be reserved as spare capacity for the unaccounted playing pitches from Goodmayes Hospital which remains open for the time being and why the hospital trust(s) are against the simultaneous release of both sites run by separate boards. As early as 2010 Redbridge came to the dogmatic conclusion that virtually all the Green Belt land in Southern Redbridge had to go with Fords and Billet Road added to the list of biased reports

In terms of public accessibility LP 35 ii Happy Valley should be opened up so the A12 can be easily traversed especially if a footpath is installed towards Billet Road assuming this is possible with yet more housing proposed !

Similarly the proposed A12 link road on Fords should not be allowed even if remedial measures are taken to prevent it becoming an environmentally

damaging rat run in unacceptably close proximity to the Blue Ribbon Seven Kings Water.

The London Green Belt Council believes it is highly unsound and unjustified for either any of these green belt sites to be removed even if as part of mitigation absent by Redbridge from these proposals that alternative sites were offered in addition to severe diminution of the so-called Crossrail **Corridor Investment and Growth** Area. If the Inspector rules in our favour of NPPF and ourselves surely it would be appropriate for the above sites to remain in Section 3 as part of a huge IGA; instead they should be regarded as an integral part of the Borough's assets as per this Section and safeguarded on an amended Policies Map as an integral part of LP 34. In addition if Goodmayes Park extension is protected by MOL, and development at KGH is limited to the **outside** with a separate policy for Goodmayes Hospital then these modifications together with boundary revisions to Seven Kings Park should all be recorded on a modified Policies Map. For the avoidance of doubt can the Council make clear in all their documents and their associates Wardell & Armstrong that in the case of the Goodmayes Hospital sizeable parts of the playing fields are no longer in NHS ownership ( LBR Email 2/5/17 ) and the Barley Lane Allotments are also excluded from housing development. As there appears to be confusion about the precise extent of NHS land ownership I suggested a site visit '

## CONCLUSION

The London Green Belt Council representing c10,000 group members broadly welcomes the submission by the London Wildlife Trust and are pleased that several of its positive representations notably for the Goodmayes Hospital site to become a SINC Grade 1. have been accepted by the Council. Currently as the Sinc Grade 2 site adjacent to the Ilford – Chadwell Heath rail sides have become a large building site other SINCs it important to safeguard them robustly during construction work.

AECOM in their Sustainability Appraisal March 2017 on p11 Para 2.4.14 quotes the Mayor objecting to all 6 proposed release sites naming the hospital sites and Fords. And notably to all 3 sites within the huge Crossrail Corridor IGA. In reply we are not aware of any comprehensive masterplan resulting from extensive public consultation covering all 3/4 sites in my view the KGH site needs to be detached from the Goodmayes Hospital site for all the reasons stated above. Moreover, the consultants to the Mental Health trust appear to accept the hospital sites will if developed be released in stages and they on lines of the

Claybury Hospital site could restrict building to the footprint of the existing Victorian site. We would like the Inspector / Council to examine this option so the main hospital buildings could provide c 200 homes plus health infrastructure etc. to help close the gap in terms of affordable units . The NE London Mental Health Trust have suggested the proceeds could be ploughed back into patients services- did this happen in regard to the nearby Chadwell Heath geriatric hospital site before it closed about 10 years ago ?

In view of recent events in Kensington & Chelsea all Redbridge IGAs should have robustly constrained boundaries so they are readily deliverable when there is no extra funding readily available for such ambitious projects.

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Whilst a Site of Nature Conservation Importance is located to the west of Site A, 'Plan B – Illustrative Masterplan' demonstrates that no development would be required in this area in order to deliver the proposed residential development.

An Ecological Survey was undertaken by Indigo Surveys on behalf of NELFT in 2015. A survey found that with the exception of bats, there is no evidence of European Protected Species or Notable Protected Habitats within the site. In relation to bats, a Nocturnal Bat Survey found that the main bat roosting points were contained within the existing hospital buildings. Whilst some of these may be removed as part of any proposal, mitigation measures can be put in place to ensure bats are adequately protected.

As detailed above, a number of buildings on the site are locally listed. The proposals prepared by NELFT have been informed by a Heritage Assessment, prepared by CgMS, and which has concluded that any proposal that retains and converts the echelon buildings would protect the site's heritage by securing the built fabric of the original hospital buildings, ensuring no further degradation occurs. Therefore, any impact caused by the part demolition of the hospital buildings would be offset.

In relation to the other land within NELFT's ownership, only Site D is, at this moment in time, considered to be available for development. Whilst the site, in the main, comprises a playing field (marked out as a football pitch) it is not subject to a Protected Open Space and Play Space designation on the Policies Map that accompanies the draft Local Plan. The London Borough of Redbridge Playing Pitch Strategy (2016), which forms part of the evidence base for the draft Local Plan, does not identify Goodmayes as an area where there is a lack of provision of such facilities. In addition, Site C, located to the north of Site D, is, as detailed above, not available for development of residential uses. However, Site C could be used to provide enhanced open space / sports facilities as part of any wider redevelopment of the Goodmayes Hospital Site.

Initial work undertaken by Ingleton Wood, and which is detailed on Plan B – Illustrative Masterplan demonstrates that Site D has capacity to provide at least 200 residential units. This would comprise new build development, which having regard to the context of the surrounding area, is likely to be circa 2-3 storeys in height.

With regard to highways, work undertaken by Peter Brett Associates has demonstrated that safe vehicular access to Site D could be provided via a safeguarded access on to Barley Lane via Medici Close. NELFT has retained access rights following a past disposal of land to Bellway Homes. The work undertaken by Peter Brett Associates also concludes that the local highway network can accommodate in excess of 500 units and that the site presents opportunities to provide more sustainable journey patterns to and from the local area.

It is strongly requested that this information is used by the Council to prepare a robust evidence base to justify the proposed allocation and demonstrate that objectively assessed development needs can be met during the plan period. This approach will ensure that the Local Plan is 'sound'.

As detailed on Plan A – Constraints Plan and Plan B – Illustrative Masterplan, land within the ownership of NELFT has capacity to accommodate, as a minimum, the scale of residential development proposed by the draft Local Plan. In addition, the work prepared on behalf of BHRUT, owners of the King George Hospital, demonstrates that approximately 187 residential units can be accommodated on the northern part of the Opportunity. The two sites within the Opportunity Site therefore have the potential to exceed the 500 dwellings envisaged by the draft policy. Accordingly, to ensure that the opportunities

- A permeable design – a walkable neighbourhood with routes and spaces defined by buildings and landscape;
- 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. 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
- Development of this site should be considered in the context of a Masterplan for the site as a whole.

## 2.3 High Level Transport Study (TS) Report

2.3.1 This report was undertaken by Atkins on behalf of LBR and provided a review and feasibility study of two sites for potential Local Plan Allocation. The two key opportunity sites that were tested in this high level transport study were Oakfields Playing Fields (Site One) to the north of Barkingside Town Centre and land in and around King George and Goodmayes Hospitals, including the Ford Sports Ground (Site Two). Location plans for both Site One and Two are included within **Appendix C**.

2.3.2 Early-stage indicative site assessments show that the two opportunity sites could yield between 1,474 and 2,849 new homes (between 614 – 899 for Site One depending on Site Development Yield, and between 860 and 1950 for Site Two depending on Yield) with supporting community infrastructure such as new schools also provided.

2.3.3 The scenarios tested for the King George and Goodmayes Hospitals, including the Ford Sports Ground (Site Two) site are as follows:

### Low Yield Scenario

2.3.4 The Low Yield Scenario for Site Two comprises approximately 900 new homes with an overall mix of 41% flats and 59% houses.

- Potential Access Point A - housing plus a new 4FE Primary School and a new 10FE Secondary School - accessed via Aldborough Road South;
- Potential Access Point B – housing – accessed via the A12 Eastern Avenue and the B177 Barley Lane;
- Potential Access Point C – housing – accessed via the B177 Barley Lane; and
- Potential Access Point D – housing – accessed via the B177 Barley Lane.

### Medium Yield Scenario

2.3.5 The Medium Yield Scenario for Site Two comprises approximately 1,100 new homes with an overall mix of 49% flats and 51% houses.

- Potential Access Point A - housing plus a new 4FE Primary School and a new 10FE Secondary School - accessed via Aldborough Road South;
- Potential Access Point B – housing – accessed via the A12 Eastern Avenue and the B177 Barley Lane;
- Potential Access Point C – housing – accessed via the B177 Barley Lane; and
- Potential Access Point D – housing – accessed via the B177 Barley Lane.

### High Yield Scenario

2.3.6 The High Yield Scenario for Site Two comprises approximately 2,000 new homes with an overall mix of 77% flats and 23% houses.

- Potential Access Point A - housing plus a new 4FE Primary School and a new 10FE Secondary School - accessed via Aldborough Road South;
- Potential Access Point B – housing – accessed via the A12 Eastern Avenue and the B177 Barley Lane;
- Potential Access Point C – housing – accessed via the B177 Barley Lane; and
- Potential Access Point D – housing plus a new 4FE Primary School – accessed via the B177 Barley Lane.

2.3.7 The High Level Transport Study concludes that for Site 2:

*'It is considered that with suitable provision of infrastructure to access the sites, the proposed site offer the opportunity to deliver development that is sustainable in transport terms in accordance with NPPF.'*

*'The assessment has identified that in Plan Year 2030, irrespective of yield development at Site Two is likely to have will have a Major Impact on the A118 High Road and Moderate Impacts on the B117 and Aldborough Road South.'*

## 2.4 Section Summary

- The local plan includes for LP1B: Crossrail Corridor Investment and Growth Area which includes the proposed development site.
- High level Transport Study identifies Opportunity Site 46, which includes King George and Goodmayes Hospitals and the Ford Sports Ground, as being suitable to accommodate between 860 and 1950 units.
- The Local Plan suggests that specifically the land in and around King George and Goodmayes Hospitals will be developed to provide around 500 high quality new homes (including affordable) and an on-site provision for a new primary and secondary school;
- High level Transport Study indicates that irrespective of yield development at Site Two is likely to have will have a Major Impact on the A118 High Road and Moderate Impacts on the B117 and Aldborough Road South.