Dear Sir/Madam

Preferred Options draft: Core Strategy Review – Representations submitted on behalf of the Barking, Havering and Redbridge (University Hospitals) NHS Trust

Bidwells have been instructed by the Barking, Havering and Redbridge (University Hospitals) NHS Trust (BHRUT or ‘the Trust’) to respond to the London Borough of Redbridge Preferred Options draft of the Core Strategy review document 'Redbridge 2028'.

Growth: The Sustainability Model

Do you agree with the Council's overall approach to managing growth? Are the Investment Areas appropriate? Can you suggest a more sustainable way of managing growth?

My client, BHRUT, generally supports the Council's approach to growth within the Borough in terms of the principle of directing new development to the investment areas. It is clear that these areas have been designated on the basis of their close proximity to public transport connections and therefore also to potential employment, educational and retail opportunities and services, and are therefore the most sustainable growth locations in the Borough.

The Trust does however contend that it would be very useful if there was a policy, or some suitable wording, that encouraged the intensification of uses in Investment Areas where appropriate, to ensure the most efficient use is made of land within these highly sustainable locations. It is the Trust's view that this approach has not been fully explored to date, particularly in relation to their land at King George Hospital, Goodmayes which is located within the Crossrail Corridor Investment Area. The site is identified within Appendix 1 of the review document as being an 11.99 hectare (ha) site which should be retained for healthcare expansion. The freehold ownership of the Trust is closer to 17 hectares, approximately 2.5ha of which is occupied by leasehold tenants, approximately 8.5ha lies within the developed area of the hospital and approximately 6ha is open space (accounting for almost half of the available freehold and a third of the total ownership). BHRUT acknowledge that not all of the 6ha would be suitable for development; however there is nonetheless a large area of land that could be sensitively developed for non-healthcare related uses.

The Trust has confirmed that two areas, labelled Site 1 and Site 2 on the attached site location plan, are surplus to their existing and future requirements. The overall plan for King George Hospital, as part of the Health for North East London proposals, is for the hospital to concentrate on elective clinical work. This means there will be a reduction in emergency care and maternity facilities over the coming years, with the expansion of these services at nearby Queen's Hospital, Romford. These plans have resulted in the opportunity to look at alternative uses for the vacated facilities, including new community health facilities. On this basis the Trust, in collaboration with the local Primary Care Trust, redeveloped the vacated Outpatients area into a brand new Polyclinic. The facility was completed in March 2012 and the PCT are currently
working towards securing a GP practice to move into the facility. The plans, therefore, are not to expand the hospital's functions and services into the surrounding land now or in the future contrary to the recommendations of the London Borough of Redbridge Green Belt Review 2010 (Stage 4: Possible Alternative Uses). These sites have therefore been identified by the Trust as surplus and are available for alternative development.

It is highly unlikely that any new healthcare services at the Hospital would require the undeveloped land that surrounds the hospital to expand into, when large parts of the hospital are currently being vacated. Furthermore the hospital's low density campus-style layout, most likely originating from its Green Belt location, provides an opportunity to significantly improve the efficiency of the site's use in the longer term. The hospital has a number of large surface level car parks and is predominately made up of low-level one and two storey buildings. Therefore if expansion was required in the future it would be better to consolidate and redesign the use of the existing space than continue to expand into the open areas which provide an opportunity to deliver much needed housing.

**Affordable Housing**

*Do you agree with the Council's proposal not to adopt a specific affordable housing target?*

My client, BHRUT supports the principle of the Council's proposal not to adopt a rigid affordable housing target providing the relevant policy wording is sufficiently flexible to allow for development viability and unforeseen market downturns. This recommendation is in accordance with paragraph 21 of the National Planning Policy Framework which states that "Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances".

**New build flats**

*Do you agree with the controls over flat conversions in established areas of family housing should be extended to new build flats as well?*

My client, BHRUT objects to the idea of strong controls over flatted development in established areas of family housing. Whilst it is understandable that the Council wishes to protect its stock of family sized housing it is unreasonable to suggest that flatted development is wholly unsuitable in established areas of family housing.

In the first instance, the Council’s Preferred Options draft: Core Strategy Review document highlights the insatiable need for new housing in the Borough which the Council cannot identify suitable sites to accommodate. It would therefore seem prudent to adopt a more flexible approach which could allow higher density development where it may be suitable. This is particularly relevant given the Council has identified that market sector need focuses on smaller 1 and 2 bedroom units. In addition, flatted development is capable of being family sized.

Secondly, a mix of dwelling sizes in all locations should be encouraged to ensure communities remain sustainable and mixed. Proposing an effective ban on flatted development in family sized housing areas could result in the marginalisation of key sections of the community. For example; older generations are often encouraged to downsize to single level smaller dwellings which are more manageable and accessible, if these alternative dwellings are far from the area they are familiar it is likely to make them feel isolated and deter others who would benefit from downsizing.

Whilst we understand this policy is aimed at preventing family houses being lost in favour of new flatted development when the conversion of those properties is already controlled, however the wording of the policy should more clearly reflect this objective otherwise the Council is at risk of preventing suitable flatted development coming forward.
Additional sites

Are you aware of any additional sites that the Council has overlooked but which are able to make a major contribution to meeting need and are likely to come forward for development within the lifetime of the plan?

As detailed under the heading “Growth: The Sustainability Model” above, my client BHRUT has two sites adjacent to King George Hospital, Goodmayes which we believe are available and suitable for housing development. I have attached a site location plan which highlights the two areas as well as a plan detailing my client's freehold interests for your reference. Please note; both sites have been submitted to the GLA's London-wide Strategic Housing Land Availability Assessment (SHLAA) call for sites.

Site 1

The first site is the larger of the two and comprises approximately 1.94 hectares of overgrown, disused open land to the south of Eastern Avenue (A12) and north-east of the King George Hospital campus. Approximately 1500 square metres in the north west of the site is covered by the concrete foundations of a previous development. The site is currently located within the Green Belt, although as part of the King George Hospital site it is expected to be removed from the Green Belt through this review. The site is well confined by development to three sides; it is bounded in the north by a mature tree line beyond which lies a busy dual carriageway section of the A12, to the east it is bordered by Barley Lane and residential development, to the south the site adjoins a flatted key worker residential development and to the west the site adjoins an area of open space which comprises a public footpath and landscaping bunds. The site is the subject of a Green Corridor designation, although in our view a sensitive development scheme could incorporate a high quality landscape strategy and mitigation package that could ensure the reasons for the designation are upheld and/or mitigated where necessary. The site lies within an area of low flood risk (Environment Agency Flood Zone 1).

The land has been unused for some years, although it had previously accommodated a number of gardener's buildings which after a period of disuse became the subject of anti-social behaviour. The Trust decided to remove the buildings in 2010 in an attempt to address these problems, unaware that doing so removed the site's status as ‘previously developed land in the Green Belt’, despite the fact that the concrete foundations of the buildings remain. The site remains derelict and overgrown, and whilst the security around the site has been somewhat improved the site nonetheless continues to attract unwanted behaviour and detracts from the visual amenity of the area as well as the sense of security of the adjoining pedestrian and cycle paths. As such, whilst this site may appear to be an important greenfield Green Belt site, it has been established by the recent Green Belt review that it no longer performs the functions of Green Belt described at paragraph 80 of the National Planning Policy Framework. Furthermore the site has formerly accommodated built development and currently has a negative impact on feelings of safety and security in the local area.

Site 2

The second site is considerably smaller comprising approximately 0.31 hectares of overgrown and disused land at the south-eastern corner of the Trust's ownership, on the western side of Barley Lane, Goodmayes. The site currently accommodates a series of sheds, greenhouses and a gardener’s shelter.

The site is brownfield land located in the Metropolitan Green Belt, and is recommended for release as part of the King George Hospital land by the Green Belt Review commissioned by the Council. It is well confined by development to all sides; it is bounded in the north by the main exit of the hospital (with key worker accommodation beyond), to the east it is bordered by Barley Lane (beyond which is an established residential neighbourhood), to the south the site adjoins the main entrance to the hospital and to the west the site adjoins the Just Learning nursery with associated outdoor space and car parking. Along the northern and eastern boundaries of the site are established rows of mature trees. Like the first site it is also the subject of a
Green Corridor designation, although it is our view that a sensitive low density development scheme could ensure the reasons for the designation are upheld and/or mitigated where necessary. The site also lies within an area of low flood risk (Environment Agency Flood Zone 1).

The land has been underused for a number of years, although it does still accommodate some storage sheds however these are not currently in use. The site remains derelict and overgrown and detracts from the visual amenity of the area as well as the sense of security of the adjoining nursery. As such, whilst this site is currently within the Green Belt, it has been established by the Council’s own review that it no longer performs the functions of Green Belt described at paragraph 80 of the National Planning Policy Framework, being a small brownfield site which is surrounded by built development on all sides. Moreover its derelict state has a detrimental impact on the street scene and on the amenity of the neighbouring nursery.

In sustainability terms, both sites are close to a number of local schools, services, transport links and other facilities, listed below, and are located within the area covered by the Redbridge Crossrail Corridor Area Action Plan.

- 6 primary schools within 2km, the closest are Grove Primary School and Farnham Green Primary School (with a new primary school expected to be delivered on land adjoining the Goodmayes Hospital).
- 4 secondary schools within 2km and 8 within 3km. The closest are The Chadwell Heath Academy and Oaks Park High School.
- 24-hour Tesco store located approximately 1.5km walk due south adjacent to Goodmayes Train Station
- There are 6 bus routes which stop within very close proximity of both sites which serve mainline and underground train stations as well as other local centres:
  - Goodmayes, Ilford, Chadwell Heath and Romford stations – operated by Greater Anglia with services towards London Liverpool Street, Brentwood, Shenfield, Chelmsford, Basildon, Southend, Colchester, Ipswich and Norwich.
  - Barking Station - mainline services operated by C2C with services to London Fenchurch Street, Dagenham Dock, Upminster, Lakeside Shopping Centre, Basildon and Southend. Also District and Hammersmith & City London Underground services.
  - Newbury Park (Central Line), Gants Hill (Central Line), Redbridge (Central Line), Wanstead (Central Line), Leytonstone (Central Line), Grange Hill (Central Line) and Dagenham Heathway (District Line). Newbury Park is the nearest London Underground Station and is approximately 2-2.5km walk from the sites.
  - Routes also serve University of East London (Barking campus), Barking Reach, Ilford town centre, Chadwell Heath High Road, Goresbrook Leisure Centre (including adjacent cinema & bowling), Beckton (including retail park), Hainault district centre and Romford town centre – Numerous services are located at all of these locations as well as links to more service centres.

As demonstrated the sites already benefit from excellent connectivity to numerous employment, educational, retail and entertainment opportunities, with the delivery of Crossrail it is anticipated that both sites would benefit from further improved connectivity. Both sites are therefore considered suitable for residential development and represent favourable options to address the objectively assessed housing needs of London and the Borough of Redbridge.

As detailed under the ‘Growth: The Sustainability Model’ heading, the Trust has confirmed that there are no expansion plans at King George Hospital for the foreseeable future, and current changes to the operation of the hospital will in fact see a consolidation of existing services. This means that existing space within the hospital has been, and will continue to be made vacant for new community or healthcare related uses. As
such there is no need for the land surrounding the hospital to be protected for healthcare expansion in the short to medium term. In relation to long term healthcare need; it should be noted that the existing hospital layout makes poor use of the site with large areas of surface level car parks and almost all of the buildings being low-level one or two storey buildings. This is most likely a result of its Green Belt setting, however it means the site has the potential to be redesigned to make better use of the space and therefore accommodate considerable expansion in the long term without the need to expand into the adjoining open space.

Parking
Should the Council be able to insist on at least a minimum of off-street car parking in new developments further away from public transport (and not just a maximum amount as at present)?

My client, BHRUT supports the Council’s intention to consider the introduction of minimum parking standards where they are appropriate. However they contend that the approach proposed by the Council only addresses situations where too little parking may be provided and does not address instances where it may be appropriate to provide more than the London Plan maximum. We therefore suggest that suitable wording should also be included to acknowledge the advice contained within Annex 3 of the Mayor’s Housing SPG, which specifically encourages outer London Borough’s to apply a flexible approach to the maximum standards where appropriate to take account of reduced access to public transport in some areas of the Borough.

Conclusion
I trust the above representations will be taken into account by the Council and due consideration will be given to the views of the Barking, Havering and Redbridge (University Hospitals) NHS Trust in relation to their expansion plans and the future use of their land.

I would be grateful if you could confirm receipt of this letter.

Yours faithfully,

Emma Deighan
Principal Planner

Enc  Extract of Housing SPG (November 2012) - Annex 3: Car Parking Provision Guidance
     Site Location Plan (1:5,000 @A4, Reference A.43,339)
     King George Hospital Freehold/Leasehold Plan

Copy  Peter Harris/ BHRUT
      Bernie McGonnell/ BHRUT
King George Hospital, Barley Lane, Goodmayes

Site 1
Area: 1.936ha

Site 2
Area: 0.305ha

Note: This plan is published for convenience only and although believed to be correct its accuracy is not guaranteed and shall not be deemed to be part of the contract.
ANNEX 3 CAR PARKING PROVISION GUIDANCE

A1 Section 1.3 of Part 1 of this SPG addressing implementation of LP Policy 3.4 (optimising housing potential) and Housing Standard 3.3.1 both draw on the Plan’s parking policy 6.13 and in particular the ‘parking for residential development’ Table 6.2 set out below.

LP Table 6.2 “Maximum residential parking standards”

<table>
<thead>
<tr>
<th>Number of beds</th>
<th>4 or more</th>
<th>3</th>
<th>1-2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Parking Spaces</td>
<td>2 – 1.5 per unit</td>
<td>1.5 – 1 per unit</td>
<td>Less than 1 per unit</td>
</tr>
</tbody>
</table>

A2 There is a widespread perception¹ that the Plan’s parking standards above have to be applied mechanically, effectively with little or no regard to other relevant policies. Legally, this is not the case, and the Mayor’s intent comes from reading the Plan as a whole. If this is done it can be seen to provide local flexibility, supporting the NPPF with scope to take account of accessibility; type, mix and use of development; availability of, and opportunities for, public transport; local car ownership; and the overall need to reduce use of high emission vehicles, as well as responding strategically to London’s unique circumstances.

A3 Policy 6.13C states that the “maximum standards set out in Table 6.2 … should be applied to planning applications” should be implemented in the context of the much more broadly based and over-arching Policy 6.13A in which “the Mayor wishes to see an appropriate balance being struck between promoting new development and preventing car parking provision that can undermine cycling, walking and public transport use”. This flexibility is amplified in supporting text where the Mayor “recognises that London is a diverse city that requires a flexible approach to identifying appropriate levels of car parking provision across boundaries. This means ensuring a level of accessibility by private car is consistent with the overall balance of the transport system at local level”.

A4 Compared to inner and central London, outer London displays much more variation in the factors underlying NPPF parking policy - accessibility; type, mix and use of development; availability of, and opportunities for, public transport; and local car ownership levels. Greater flexibility is therefore required in implementing pan London parking policy there, and in particular, its associated parking standards.

A5 LP Table 6.2 on car parking standards above relates dwelling size (in terms of bedrooms) to car parking provision. A footnote to the Table indicates that this Housing SPG “will include a table setting out a matrix of residential parking standards that reflect PTAL levels”. It is difficult to embody the Plan’s flexible approach in a single matrix - at least one that will be easy to apply in practice. Accordingly, two complementary illustrations to guide implementation of the parking standards in relation to public transport accessibility are set out below. Matrix 1 has the virtue of simplicity and only adds PTAL level to the bedroom based standards in LP Table 6.2. Matrix 2 is more sophisticated and provides scope to relate transport and development more

¹ Outer London Commission 2012 ibid
closely by effectively adding the parking standards to LP Table 3.2, the density matrix. These matrices are only indicative and use graduated shading to underscore the flexibility in the Plan’s parking policies. It is intended that they should be used to establish the parameters for a broader appraisal of local circumstances. Mechanistically ‘one size fits all’ planning tools are not appropriate in this context.

A6 The Outer London Commission found that “while over two fifths of Outer London’s population live in areas with low public transport accessibility (PTALs 0 - 1), these areas account for only one fifth of Outer London’s housing output or 9% of the London total. In much of the area a reasonable increase in parking provision above strategic standards for new development might have only a limited effect on local congestion in peak periods… Boroughs are best placed to interpret how the standards should be implemented in low PTAL areas and … the ability to implement policy flexibly is already in their hands2”. In doing this in these areas, boroughs are advised to take account of accessibility to local services and amenities, the availability of local on- and off-street parking; and existing and future highway congestion. They should carefully monitor the impact of a more flexible approach to parking provision on residential development capacity. Outer boroughs are advised to take a firmer approach to implementation of the residential parking standards in major developments, town centres and Opportunity Areas in these areas as they are likely to generate more concentrated traffic flows and congestion.

A7 In some cases mechanistic application of parking policy may be partly a product of development management processes3 – advice on the policy is sometimes developed separately from that on other planning issues and not integrated within it in a balanced way. Thus, for example, the approach to parking provision for smaller dwellings is sometimes literalist in the sense that ‘less than 1 space per unit’ is interpreted as being as far below 1 as possible rather than embracing the flexibility of the Plan to enable provision to be ‘up to 1’. Policy should be applied appropriately in the local circumstances of each case, having regard to the degree of flexibility inherent in strategic policy. More generally, relevant authorities should seek to ensure that a balanced approach, taking proper account of all material considerations, is taken when implementing parking policy.

A8 Car parking is an important land use and design consideration. Particular account should be taken of the impacts that the siting and organisation of car parking could have on the use and appearance of open spaces and access to the home, and their effects on housing delivery.

A9 To secure closer integration between development and public transport accessibility, in appropriate locations with good public transport accessibility boroughs should consider the scope to use planning conditions and planning obligations on whole developments, and covenants on individual dwellings, to manage parking demand. This can include using mechanisms such as reduced car parking standards and, in controlled parking zones, ineligibility for on-street

2 Outer London Commission 2012 ibid paras 4.15 - 16
3 Outer London Commission 2012 ibid
residents parking permits. Account should also be taken of the planned social composition of a development and its bearing on parking demand, more general changing attitudes towards car ownership and use, and the need to coordinate on- and off-street parking provision to address local amenity, congestion and safety concerns. Car-capped and car-free housing, through controls over residents’ parking and permits and encouragement of ‘car clubs’ can allow higher densities to be realised in appropriate locations without compromising residential quality. Car clubs are increasingly proving viable and attractive in areas well served by public transport and with effective on-street parking controls. Car-free developments should allow space for drop-off, emergency access and deliveries, and meet the needs of disabled residents and visitors.

A10 Policy 6.13 requires appropriate provision for parking for disabled people, recognising the LP target that 10% of residential provision should be accessible by wheelchair users. Each designated wheelchair user dwelling should be allocated a designated parking space in line with Standard 3.3.2 and GLA Best Practice Guidance on wheelchair user housing. Where relevant account should be taken of the need for convenient wheelchair access between parking and residential levels of buildings. Disabled persons parking bays and mobility scooter storage/charging points should be located as close as possible to lift cores.

A11 The Plan also encourages more widespread use of innovative energy technologies including hydrogen as an alternative to fossil fuels, by fostering uptake of hydrogen and fuel cell vehicles and provision of infrastructure to support them (Policy 5.8). Policy 6.13 promotes the uptake of electrical vehicles and requires 20 per cent of all parking spaces to provide electric charging points for electric vehicles with an additional 20% ‘passive’ provision for electric vehicles in the future. ‘Passive’ provision means putting in place the cabling and supporting infrastructure to facilitate future installation of charging points.

A12 The LP seeks to improve conditions for cycling, including encouraging adequate, secure cycle parking facilities within new developments, taking account of the cycle parking standards set out in LP Table 6.2 and summarised in Housing Standard 3.4.1 (these are subject to revision).

A13 The Mayor is considering an Alteration to the London Plan to secure a more effective balance and approach in addressing parking related issues.

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4 Urbed for Greater London Authority (GLA), the London Development Agency (LDA), the Association of London Government (ALG) and Transport for London (TfL). Tomorrow’s Suburbs: London Plan toolkit. GLA, June 2006
6 Mayor of London LP 2011 ibid, Policy 3.8

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Matrix 1

<table>
<thead>
<tr>
<th>Number of bedrooms</th>
<th>Indicative maximum spaces per unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>4+</td>
<td>2</td>
</tr>
<tr>
<td>3</td>
<td>1.5</td>
</tr>
<tr>
<td>2-</td>
<td>-1</td>
</tr>
</tbody>
</table>

Matrix 2

<table>
<thead>
<tr>
<th>Suburban</th>
<th>PTAL 0 to 1</th>
<th>Parking provision</th>
<th>PTAL 2 to 4</th>
<th>Parking provision</th>
<th>PTAL 5 to 6</th>
<th>Parking provision</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.8–4.6 hr/unit</td>
<td>35–55 u/ha</td>
<td>Up to 2 spaces per unit</td>
<td>45–90 u/ha</td>
<td>Up to one space per unit</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.1–3.7 hr/unit</td>
<td>40–65 u/ha</td>
<td>Up to 1.5 spaces per unit</td>
<td>45–120 u/ha</td>
<td>Up to one space per unit</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2.7–3.0 hr/unit</td>
<td>50–75 u/ha</td>
<td>Up to 1.5 spaces per unit</td>
<td>55–145 u/ha</td>
<td>Up to one space per unit</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Urban</td>
<td>150–250 hr/ha</td>
<td>Up to 1.5 spaces per unit</td>
<td>65–170 u/ha</td>
<td>Up to one space per unit</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.8–4.6 hr/unit</td>
<td>35–65 u/ha</td>
<td>Up to 1.5 spaces per unit</td>
<td>70–170 u/ha</td>
<td>Up to one space per unit</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.1–3.7 hr/unit</td>
<td>40–80 u/ha</td>
<td>Up to 1.5 spaces per unit</td>
<td>80–210 u/ha</td>
<td>Up to one space per unit</td>
<td></td>
<td></td>
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<tr>
<td>2.7–3.0 hr/unit</td>
<td>50–110 u/ha</td>
<td>Up to one space per unit</td>
<td>100–240 u/ha</td>
<td>Up to one space per unit</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Up to 2 spaces per unit
Up to 1.5 spaces per unit
Up to one space per unit