

Friends Of Riverside Gardens Erith

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**Response to Local Development Framework
Supplementary Planning Document
Erith Western Gateway Development Framework
Draft for consultation February 2011**

Introduction:

The membership of FORGE now stands at 600 and is increasing every day. We object to the proposal to build a multi-storey block of flats on the Flagpole Site on the Erith Riverside Gardens as outlined in the Draft Erith Western Gateway Development Framework document.

Supporting our society includes the following:

Teresa Pearce MP for Erith and Thamesmead.
Councillor C. Ball – Erith Ward
Councillor Margaret O’Neill – Erith Ward
Councillor Edward Boateng – Erith Ward
The Bishop of Tonbridge
Erith Town Forum
Open Spaces Society
Friends of the Earth Bexley
Bexley Civic Society
Erith & Belvedere History Society
Erith Rotary Club
Members of the Erith Yacht Club
Members of the Erith Rowing Club
Members of Erith Theatre
Members of Erith Women’s Institute

Long-standing residents of the Erith Community
 New residents of numerous European, African, Asian and West Indian nationality in
 our Central Erith community.

Comments on the Draft Erith Western Gateway Development Framework February 2011

This proposal would mean we lose approximately one quarter of the relatively small open space that is unique to Erith and, therefore, the whole Borough, in having a frontage to the River Thames. There is no other such open space from Greenwich to Gravesend. We should be proud of this area not bury it under concrete!

It is stated that this building is required in order for the developer to landscape the remaining area of the Gardens. This is nonsense; The Mayor of London has over £180 million to fund such schemes. Indeed, Bexley has applied and been granted funds for four projects in Bexley. i.e. Lesnes Abbey Wood; Parish Wood Park; The River Shuttle; and Erith Marshes and Belvedere Links. Surely, this would have been a golden opportunity for Bexley Council to have ensured the funding for the re-landscaping of the Erith Riverside Gardens without having recourse to a developer. Was this an oversight or deliberate? It is not too late to apply now - this money is stated to be available for the three years from 2009.

It is stated in the Sustainability Appraisal Report for the EWGDF that Erith Riverside is a Conservation Area (one of only two Conservation Areas in Erith out of 23 Conservation Areas in Bexley Borough). Where is the justification in building on this unique Conservation Area? Would this be allowed in any of the other 21 Conservation Areas in the Borough?

The Flagpole Site (formerly known as Railway Wharf) on which it is proposed to put a multi-storey building is land which was gifted to the people of Erith in 1967 by Wm. Cory & Sons to Bexley Council in order that this land could be added to the Riverside Gardens open space acquired in 1936 which abuts the Flagpole Site. If the Erith Urban District Council recognised in 1936 and the London Borough of Bexley recognised in 1967 that Erith needed open space – how much more is this open space required considering the increase in population since the 1990s? The new EWGDF proposals to build over 340 new housing units, magnified by the proposal to relocate Bexley College on the old Tram Shed Site, means the Riverside Gardens needs to be retained in their entirety as an open space.

It is illegal and, indeed, immoral for the Council to seek to rob Erith of this Flagpole Site gifted in 1967 - the Erith Riverside Gardens in their entirety are an integral part of our Erith identity. We intend to do all in our power to prevent this from happening.

Throughout the Sustainability Appraisal Report Erith is stated as having the worst air pollution, the most shop vacancies, and the lowest incomes, is second in having the most unemployed and is generally the most deprived region in the Borough. These Gardens are a respite for the population of Erith who suffer from many health problems and, in particular, respiratory conditions closely allied to the recognised poor air quality here. In particular Manor Road and Bronze Age Way (A206/A2016) have ever increasing diesel driven HGV vehicles.

Even without a building on the Flagpole Site, the Riverside Gardens will still be dominated by over-development as the whole length of Erith High Street North will be totally developed with multi-storey blocks of flats from the old Swimming Pool site right up to the Post Office on the corner of Bexley Road according to the proposed planning document. Therefore there will also be loss of further open space along the opposite side of Erith High Street North where at present there exists the open space of the former Swimming Pool to one side of the Running Horses Public House and a green lawn, a play space and a terraced rose garden on the other side of the Running Horses

All this open space will disappear under brick and concrete.

THIS IS NOT TOWN PLANNING, IT IS TOWN CRAMMING.

The ridiculous suggestion by the Planners that the proposed “Station Square” could compensate for the loss of riverside open space is frankly laughable. Station Square (see LDF document page 19) is a concreted car park with a few trees dotted around.

The proposal to build on open space is in Breach of Government “Planning Policy Guidance 17: Planning for open space, sport and recreation.”

According to the above guidelines:-

Panning Objectives:

“Open spaces, sport and recreation all underpin people’s quality of life.”

“Open spaces and recreational facilities have a vital role to play in promoting healthy living and preventing illness, and in the social development of children of all ages through play and interaction with others.” - Children living in Central Erith have no gardens or play space.

“.....can play a major part in improving people’s sense of well-being in the place they live.....a focal point for community activities, they can bring together members of deprived communities and provide opportunities for people for social interaction”

“Open spaces, sports and recreational facilities have a vital role to play in promoting healthy living and preventing illness.”

“Open spaces underpin people’s quality of life. Green Spaces in urban areas act as “green lungs” and improve people’s sense of well-being in the place they live.” - In the deprived area of Erith the Gardens open space gives children and adults living in flats a chance to play and interact with others.

10. *“Existing open space should not be built on unless it is shown to be surplus to requirements.....Developers will need to consult the local community and demonstrate that their proposals are widely supported by them”. - We maintain that the Gardens are not surplus to requirements, they are well used at present and are an*

integral part of Erith. If the proposed development goes ahead there will be an increased requirement for this open space.

11. “Open space, sports and recreational facilities that are of high quality, or of particular value to a local community, should be recognised and given protection by the local authorities through appropriate policies in plans.” - These Gardens are of particular value to our local community and have been loved and used by the local community since 1936 and 1967 respectively.

Time and again in the Sustainability Appraisal Report produced to accompany the Erith Western Gateway Development Framework it is stated that Erith has the worst air quality. We need this green lung.

The issues:

Again we have the planning department proposing substantive changes to central Erith based predominantly on their consultations with the Home & Communities Agency and Orbit South and again styled by the same design teams of architects all previously engaged with giving directions for the Crest Nicholson developers resulting then, as it has now, in giving rebirth to strong, inimical feelings of the Erith community to the current EWG draft proposals. They reveal a poor planning relationship and a lack of real understanding, an indifferent and dismissive attitude, to the wishes and aspirations of Erith people.

Although the current draft plans indicate partially limited in height high-rise flats, they are largely unacceptable to the community. This is partly due to the failure of the planning department to meaningfully engage the local Erith community in the first place and in their terms. It is likewise due to the failure to consult with them at the beginning of the regurgitation of the Crest Nicholson plans at the same time as they began their meetings and discussions with their chosen principal development partners.

The failure to give any real, and on-going consultative time and opportunities to the Erith community to do so, has severely limited any accord with those affected by these major plans of upheaval for the town and its people that could last for a number of years.

The EWG proposals are inevitably largely unacceptable. The position subsequently taken by the planners and their outside partners (whose primacy of purpose is possibly seeking economic spoils) are unbalanced, disproportionate and lacking in harmony with all of us who live here.

Erith: New Build

Central Erith has been heavily targeted with multi-storey new build over the last decade and a half. This is unfairly disproportionate to other wards in the Borough. Many wards have scarcely contributed to Greater London housing need at all.

The new build in Erith has concentrated on developer priorities for building one and two bedroom multi-storey blocks of flats off West Street, along High Street South and in Erith Town Centre:-

Chandlers Wharf – 235 units (adjacent to the Gardens)

Wharf House – 30 units (adjacent to the Gardens)

Tramway House – 23 units (adjacent to the Gardens)

Ocean Park 1 and 2 – 172 units

Galleons Close – 95 units

Corinthian Way – 16 units

St. Fidelis Road – 93 units

Stonewood Road – 36 units

Cricketers Close – 84 units

Waterside Close – 30 units

Waters Edge Court – 66 units

Pier Road (above shops) – 45 units

Atrium Court – 23 Units

Park Spring Court – 83 units

James Watt Way - 20

Totalling 1,051 + new build units

All these new build blocks of flats with their tenants are in addition to Bosworth and Carrack Houses, the existing high rise flats (14 storeys each) that dominate the Erith skyline and overlook the Riverside Gardens. For all these blocks of multi-storey flats the Riverside Gardens are their only open green space. They have no gardens of their own. All those residents who currently enjoy panoramic views will lose them.

We were assured at the time that all this concentration of new build would bring regeneration, jobs and a measure of prosperity. Developers, however, have confined their construction to one and two bedroom flats (and a few town houses) to the exclusion of the real housing needs of Erith Town. Our count of such new housing units in central Erith is over 1,051 in number.

The take-up of all of this new build has not been in the main to fulfil Bexley's needs. It has occasioned an influx of new residents from other London areas and many from overseas. The consequence has been a disjointed, unsettled "new society" of transient tenants. An example of this is one tower block of 26 flats where only 7 out of the 26 are owner occupied and most of the other 17 flats have had multiple tenancy changes in a period of just seven years. Hardly creating a stable, integrated community!

The EWG proposal is now to build a further 340 housing units in addition to the above numbers. This is a "densification" too far so far as Erith is concerned. We understand that the majority of these housing units will be even more one and two bedroom flats.

This may be at the behest of the London Plan but in the context of the real needs of the Erith Western Gateway draft proposals we submit is inappropriate. In the light of what has previously been stated of the over build of existing new build flats. We

believe that these proposed new EWG housing units will not attract an appropriate mix of occupants and will do little to provide regeneration as well as social cohesion.

Such is the intensity of this proposed EWG development that disregards the wishes of the established Erith community it is doggedly proposed for the third time to steal land from the Riverside Gardens to build a multi-storey edifice of even more two bedroom flats.

Seemingly, we have a Planning Department and Council that ignores and passes over and ultimately rejects the communities' wishes and resolve. Perhaps a referendum, worded to the satisfaction of the people of Erith, might convince those who still continue to make these unwelcome, unwanted and un-needed densification proposals for more two-bedroom flats on the Erith Riverside Gardens.

Under the former Mayor of London's administration a London-wide programme for "100 Open Spaces" included high on that list "A production of Town Centre Framework and Public Realm Strategy for Erith". This Strategy identified the Erith Western Gateway as a two-phase public space project.

Phase 1 was to develop a package of streetscape enhancements; which phase, we believe, has been completed and most would agree is a happy improvement.

Phase 2 was to focus on the redesign of "Erith Riverside Park". There was no mention of any blocks of flats on Central Erith's only open green space in that programme.

The present Mayor of London's publications, "London's Great Outdoors" and "Better Green and Water Spaces", secure four improvement schemes for Bexley but omit the welcome proposal previously made for the Riverside Gardens in the aforementioned "100 Open Spaces" document. Would this have been a real opportunity for Bexley Council to have ensured the funding for the re-landscaping of the Erith Riverside Gardens without having recourse to a developer?

Conclusion:

We find the draft EWGDF proposals unacceptable.

To propose to reduce in size the Erith Riverside Gardens, a much-valued amenity; a convenience; a comfort and a benefit for young and old alike, recognised by some as Erith's "precious jewel" demonstrates a callous disregard for the existing Erith residents living in flats and town houses nearby, for the wider Erith community and for all visitors and tourists from Bexley and beyond, greatly reducing and diminishing currently enjoyed open views of the Gardens, the River and of light from panoramic views and the open skies.

The draft planning proposals should provide a positive and protective opportunity to enhance the conservation of **all** of the Riverside Gardens and definitely include the Flagpole Site gifted to the people of Erith.

The whole of our riverside green open space does really matter to us as a community.

Joan McCarthy

Secretary

For and on behalf of Friends Of Erith Riverside Gardens.