

We believe the Plan is not legally compliant because:

CONSULTATION ON THE PLAN AND CONSIDERATION OF ALTERNATIVES HAS BEEN EXTREMELY POOR

Paragraphs 1.7 LOCAL PLAN CONSULTATION STATEMENT

It is stated that the Redbridge Local Plan has been shaped by ongoing consultation and engagement involving local people, businesses, community groups and external partners. Public consultations in 2011, 2013 and 2014 have informed the key issues and those places in the borough where change and development could be accommodated, whilst recognising that the borough must also be protected from inappropriate development. However, in Ilford South this has simply not been the case.

In Ilford South, residents have only become aware of the Local Plan in the last few months of this year. This has meant considering a Plan in the last stage of its development with virtually no room for change.

Awareness raising has been through the work of some residents who found out quite by chance about the existence of the Plan and not by the Council. None of the preceding consultations were known about by the vast majority of people in Ilford South. 1,500 people have signed a petition against the Plan in the last few months so it is obvious that they would have been involved earlier in the process had they known about it.

We find very little evidence of any engagement in Ilford South from 2011 onwards. The Statement of Community Involvement has been on paper only, not in practice. Which minority, black and ethnic, senior citizens, youth, faith-based, community and voluntary sector, and organizations representing people with disabilities were spoken to in Ilford South?

What effort was made to engage with hard to reach groups, given Ilford South is the most deprived part of the borough? Who was the leaflet produced in 2011 given to? How? Did anyone take up the offer of free translation of the 2011 leaflet?

The leaflet itself, looking at it now, is totally confusing, with a huge amount of text and a myriad of questions. Is this the plain English the Council advocates? There are very few responses to this 2011 consultation, which illustrates the lack of engagement. The only consultation with resident groups is Area Committees. It is not known how many people attended these committees. Was it a once off consultation?

However even so, the few responses still indicate the concern about the polarisation between North and South of the borough; the small size of new dwellings with the preponderance of flats; the desire not to have high density, high rise buildings; concerns about infrastructure; population density; affordable housing. However, it appears none of these concerns were taken on board.

After 2011, we have a long period where there is no further progress. Then in 2013, a Preferred Options report of 79 very dense pages is produced. Who was it designed for? Hidden amongst the copious words are the following options:

The current policy of concentrating growth on town centres has not identified sufficient sites to meet the need for appropriate new homes and community facilities, based on the most recent projections. Leaving things as they are will result in a future which is less and less sustainable because overcrowding and problems such as unlawful occupation of outbuildings will increase, homes in multiple occupation will proliferate, the quality of schools will begin to suffer and much-needed sporting, leisure and other community facilities will not be provided. New sources of supply must be found. One possible option would be to concentrate even more development in the town centres. This could be done by raising densities and building heights of new development and allowing for more growth by preparing Area Action Plans for the smaller District and Local Centres. It may also require a relaxation of standards for the provision of car parking and amenity space to allow enough housing to be delivered.

However, in reality there are a limited number of town centre sites available and these lack the space for the range of land uses required, including schools, family housing and accessible open spaces. Such an approach may give rise to a proliferation of tall blocks of flats across the Borough's town centres at a time of growing community concern about the number of flatted developments. It may also inappropriately alter the character of some centres (for instance Wanstead Town Centre is a Conservation Area) and may lead to a trade-off of housing quality for housing quantity. Even if sufficient sites could be found through this approach, the Council does not believe it would deliver sustainable development because the character of many places would be diminished. In addition, the living conditions of residents would suffer as the accommodation options of families were increasingly restricted to smaller apartments with inadequate access to amenity space and play areas for children. Another option would be to make a complete break with the "town-centre first" approach to growth and allow for major new settlement of the Borough's extensive open spaces. But that is really not an option at all. Most large tracts of open space are protected by insurmountable policy obstacles (e.g. Green Belt, Special Areas of Conservation, Sites of Special Scientific Interest, flood prone land). In addition, development which compromised the community's ability to enjoy outdoor recreation and nature and was distant from shops and services would diminish quality of life and would not be sustainable.'

The Council states that there are 'insurmountable policy obstacles' to building on Greenbelt. It has already decided this without any consultation with residents. Perhaps the insurmountable obstacles are the Council themselves.

It then states its preferred option:

Growth will be concentrated in the most accessible locations with available sites, the best public transport options and where the services

and facilities of town centres are readily available to support new residents and in turn to be reinvigorated by them. This will enable established residential areas and Redbridge's heritage assets to be protected from excessive development, to preserve their character and the identity of neighbourhoods. Areas at risk of flooding must be avoided.

The problems within Town Centre now seem suddenly to have disappeared. It states that: 'It is not intended that large parts of each Investment Area would be built on. The need to achieve a balance of uses and not focus exclusively on housing delivery was an important concern of the LDF Advisory Committee. The provision of safeguarded and enhanced parks and open recreation areas would be a critical resource and ingredient of the mix, along with sports, health, schools and other facilities. Indeed, some of the largest sites within the Investment Areas may present the opportunity to develop low density Garden Suburbs, closely combining family accommodation with parks, gardens and recreational opportunities.'

Hidden away on page 19 of the report are some questions:

- 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?

Who did they think would respond? People who had managed to get to the bottom of page 19 of their report.

Did they want a debate about the Greenbelt or do they want to avoid it?

On page 25 the Report actually states some minimum housing targets of 11,400 new dwellings in Redbridge between 2013 and 2028 in order to comply with the London Plan. It states that 'Redbridge will have input to the Mayor's review of housing in 2015/16 and this will be an opportunity

to ensure the target remains realistic. The Council will seek to exceed the minimum target to better address full housing need where this can be achieved in a sustainable way without compromising the character of residential areas or building on environmentally sensitive land. The Investment Areas identified in the Sustainable Growth Model are likely to play a key role in achieving that.' However, no specific housing unit numbers by wards or investment areas are given.

Further questions are embedded within the text:

- Do you agree with the Council's proposal not to adopt a specific affordable housing target?
- Do you agree that the controls over flat conversions in established areas of family housing should be extended to new build flats as well?
- Is it appropriate that additional flat conversions should be allowed in areas where flats already dominate neighbourhood character?

Where have the intentions of the Statement of Involvement gone? Who does the Council think will engage with this consultation, even if they know about it? The leaflet that accompanies the Report is also extremely misleading and simply does not mention housing density. It appears there's hardly any housing they are proposing but mainly infrastructure.

A lot of this is academic because this Report was not known about by the vast majority of Ilford South residents. How this report was communicated to the residents is very unclear.

On the back of the report it states that:

'How to comment: Copies of the report and details about the process, can be found at all Redbridge libraries, and the One Stop Shop at Lynton House in High Road, Ilford. You can also download a copy from Redbridge i, visit www.redbridge.gov.uk/ldf

Consultation closes at 5pm on 22 February 2013 and the Council invites written responses to its proposals.'

This report was not given the exposure it should have had, being such an important document. The policies of the Statement of Involvement are simply not being followed. There would have been many more responses had people known about the consultation, such as the following, which was actually given at the time by someone who thankfully knew about the consultation and had the time to read the report:

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'Montrose House and Commercial House at Gants Hill already overlook the back of my house and my back garden and Wentworth House overlooks my property from the front. Anything higher along the Eastern Avenue will detract from the amenity at the back of my house and my back garden. I will be overlooked and this will be obtrusive. Building heights along the Eastern Avenue and Clarence Avenue should be no higher than three storeys at the very most (Montrose House and Commercial House are currently five storeys). New buildings should be in keeping with the original character of the area rather than the many so-called "landmarks" of several storey-high buildings that local residents now have to suffer. This means that I want a reduction in the height of existing tall buildings along the Eastern Avenue. I certainly do not want an increase in height of the new buildings on or around the footprint of Montrose House and Commercial House or the Big Yellow storage building or Wentworth House. When the area around Gants Hill was developed in the early part of the last century the character of the developments was set as a series of low-rise estates. There are now too many buildings greater than three storeys high (NB This comment relates to other parts of the borough as well as Gants Hill). Buildings more than three storeys high are ugly and unsightly however they are described. (Likewise if redeveloped and if the Wentworth House site is demolished and redeveloped, the new building

should be reduced in height. Such buildings definitely do not "enhance the skyline". They detract from the enjoyment of my view from the rear of my house and the enjoyment of my garden. The existence of City Gate House should not have been used as a precedent for other tall buildings around Gants Hill. When City Gate house was built (I believe in the early 1960s) there was little or no consultation with residents who would now have that building in sight from their house or garden. I am not in favour of a policy that says an area can have more development or buildings higher than two storeys because development already exists and buildings higher than two storeys already exist. (NB This comment relates to other parts of the borough as well as Gants Hill). Character of Gants Hill It is unforgivable that the character of the area has been encroached upon by ugly tall buildings such as City Gate House, Invito House, Jasmine House, Carmel House and Gabrielle House. I do not want the character of Gants Hill to be changed further. Why should the character of places such as Wanstead be preserved to the detriment of areas such as Gants Hill, simply because 50 years ago or so an effective consultation system was more or less non-existent and the then Ilford man in the street did not have the information with which to lobby or have the tools to preserve the character of Gants Hill? I am concerned about the number of flatted developments. Flatted developments are impersonal and do not produce a community. I am also concerned that Gants Hill has been targeted whereas it looks as though Wanstead Town Centre is unlikely to be targeted for flatted developments because it will "alter its character". Gants Hill has much character. Why should Gants Hill have to suffer more "flatted developments" just because LBR has allowed tall buildings to be developed or redeveloped in Gants Hill over the past few years? It is inequitable.'

There are responses that echo the above in the consultation, however the vast majority of responses are from residents of Wanstead stating their opposition to development on 'Evergreen Field'. This shows clearly how

residents in certain areas were informed about the report and others were not.

This report is then followed a year later by a Preferred Options Report Extension, which is a much easier read and much clearer in the questions it is asking. It asks for opinions about 4 options where a small fraction of the housing units may be placed, and by this time the Ilford, Crossrail Corridor and Gants Hill options are not mentioned at all. The 4 options are: land around King George/Goodmayes hospital and Fords Sports Ground; the Wanstead and Woodford Corridor; the Oakfield site in Barkingside; and additional Greenbelt land. It makes absolutely no sense to have this consultation which ignores the vast majority of the housing location assigned in the borough. Why was the presumption made that the development in Ilford South was already the preferred option? There is no reason why it should simply have been accepted. Why were the numbers and density proposed not considered now, just like the other options? Why were the use of empty properties; how to maximize purchase and repair of properties; using council land to build social housing; using a cross-borough approach not presented as options to consider?

This time the council has a different approach to consultation to the much more important earlier Report. It seems this consultation is far more important than the previous one:

'The Council will be consulting with residents during a number of events in November and December 2014 to enable people to discuss the potential options in greater detail and to express their views directly to us. Details of these events can be found on Redbridge i www.redbridge.gov.uk/ldf or by phoning 020 8708 2748. You can also let us know your general views on the options online or by using the following form. This includes a number of questions that the Council is especially keen to hear views about, but you are welcome to include comments about any other aspects

of these proposals that you think are relevant. Please return the form to the Planning Policy Team on the address stated by freepost or email the completed survey to dpd@redbridge.gov.uk It is also available online at www.redbridge.gov.uk/ldf Responses should be received by 22 December 2014'

Which residents did the Council consult with in Ilford South about this? Despite the above declaration of wanting involvement, residents in Ilford South were completely unaware of this consultation. Even if they had been, they would not have known the fact that the vast majority of housing units had already been allocated to Ilford South. It is not mentioned once in this report where the majority of housing units will be situated.

Petitions were received regarding all 3 options not in Ilford South. The Ilford South option is only one not to have any objections. In consequence, the Ilford South option of land around King George Hospital and Fords Sports Ground was fully accepted into phase 1 and 2 of the Plan, the Wanstead and Woodford corridor option was rejected, the reason given as lack of infrastructure; building on Greenbelt was rejected and building on Oakfields was put into phase 3 of the Plan.

After this, two years later in 2016, the draft Local Plan was produced, and it is at this point one of the Ilford South residents involved in this campaign group came to know of it. The pre-Submission Plan proceeded through Neighbourhoods Service Committee on the 26th May 2016, Cabinet on the 7th June 2016 and Full Council on 21st July 2016. It has now become a document with precise numbers of units and is totally positive about placing 75% of all the development in Ilford South, with no consideration of any of the negative aspects, such as lack of infrastructure, similar to the reason the Wanstead and Woodford corridor option was rejected. There is no consideration of any of issues spoken about within the Preferred Option Report 2013 - the lack of open space,

population density issues, levels of deprivation. It is presented as a totally positive 'regeneration'.

When we came to know about the proposals in the Plan, we were dismayed by the complete lack of consideration for the quality of life of the existing residents in Ilford South shown by the policies. In order to consult now we have been advised to complete an online response or download a representation form. It has proved extremely difficult for residents to respond on an individual basis in this way. The technical terms and requirement for evidence is a huge hurdle for most people. It is not reasonable to expect that residents, who have little time to look at the myriad of documents and absorb complex information to come up with solutions to problems. If the consultation process had been properly carried out, this state of affairs would not have arisen.

It states on the Redbridge website: Representations not made online **must** be on a 'representation' form, which is available to download from the council's website or upon request from the Planning Policy Team. However in a question posed on the 15th of September 2016 at the Full Council meeting it was accepted by the Councillor for Planning that using the representation form for consultation was not a legal requirement and other means of responding were equally valid. Why is the opposite stated on the website?

Our residents group NOISE (Neighbourhoods of Ilford South Engage) was formed recently to campaign on this issue and took a deputation of 7 people to the Full Council meeting in July, to express our concerns. We have a petition of over 1,500 people, which we presented to the Council on the 15th of September, again highlighting our concerns, which triggered a debate at Council. Of course this should have been done much, much earlier in the consultation process, and would have been, had we known.

We simply have not had time to get even more people to respond to the Plan because of having to concentrate on preparing the response. We firmly believe the vast majority of residents in Ilford, particularly those who see their home and future here, are in agreement with our views. Thus to aid residents we have provided a synopsis of this report, which residents have been able to submit for consultation. The over 1,000 people who signed but did not give us an email address, we have not had time to make aware about the consultation.

In Appendix 21 of the Statement of Consultation, all consultees invited to comment on the plan to date are listed. It would be prudent to analyse exactly where these consultees are based and their ethnicity in order to assess how representative of the borough they are.

THE LOCAL PLAN COULD BE CHANGED IN ORDER TO MAKE IT LEGALLY COMPLIANT BY:

HAVING A REAL CONSULTATION ABOUT ALTERNATIVES TO PUTTING 75% OF ALL HOUSING IN ILFORD SOUTH WHICH HAS NEVER BEEN DONE. INCLUDING ALL AREAS OF THE BOROUGH IN THIS CONSULTATION.

We believe the Plan is not sound. It is not positively prepared, justified, effective or consistent with National Policy because:

THE PLAN DOES NOT FULFILL ITS OBJECTIVES OF INCREASING FAIRNESS AND QUALITY OF LIFE FOR ALL RESIDENTS

PARAGRAPHS 1.13, 1.14.4; 1.174; 1.20; 2.1; 3.22

LP1 (Spatial Development Strategy) ; LP1A (Ilford Investment and Growth Area); LP1B (Crossrail Corridor Investment and Growth Area); LP1C (Gants Hill Investment and Growth Area); LP2 (Delivering Housing Growth); LP3 (Affordable Housing); LP6 (Dwelling Conversions); LP7 (Back Gardens); LP13 (Hotels and

Tourist Accomodation); LP18 (Health and Wellbeing); LP22 (Promoting Sustainable Transport); LP23 Cycle and Car Parking; LP24 (Pollution); LP27 (Tall Buildings); LP34 (Managing and Protecting the Borough's Green Belt and Metropolitan Land; LP27 (Tall Buildings); LP37 (Green Infrastructure and Blue Ribbon Network);

Table 2 Strategic Objectives

Redbridge Council does not set out a clear vision for the Local Plan, which, we believe, is lacking in joined up thinking. We have been told that one of the many priorities of the Plan is to facilitate and deliver the regeneration of Ilford and address many of the issues it faces. Significant investment will create this improvement, we are told. This vision is a bland statement, which actually ignores the real issues of the borough and thereby produces objectives which are not clearly targeted at dealing with these issues.

The vagueness of the vision leads, in practice, to the priorities for the Plan being simply to meet housing targets and to generate income for the Council. The Plan fails take into account the current and future demographic and market trends and the needs of different groups, by a distorted focus on high density flatted developments.

Ilford South MP Mike Gapes has said, 'We have a large number of people who are living in overcrowded, inadequate or unsatisfactory private rented accommodation.' However, this Plan will do nothing to remedy this situation. The so called 'affordable' housing offer is not linked to the average incomes of the local people in a borough with the second lowest social housing stock in the whole of London and the highest house prices in outer London. Thus the affordable housing offer in the Plan will not achieve very much for local residents, as it will be well out of their reach.

Disappointingly, there is no mention of the implications of the Council using council owned land for private, market rate housing rather than for affordable housing within the vision.

The Plan proposes that 11,000 units of housing be constructed in Ilford South in the next 10 years. This the Council sees as the answer to the problems of the area. The 11,000 figure may well be even higher due to the fact that indicative housing unit numbers in the Plan are mid range. The fact that Ilford is a small town centre and not on the scale of a Romford or a Stratford, which are also designated Metropolitan Centres is not mentioned.

Redbridge has 11 neighbourhoods amongst the 20% most deprived in England and another 11 amongst the 20% least deprived. The assumption throughout the Plan is that population density does not matter. However, this is simply not justified because all the deprivation indicators for Redbridge are highly correlated with areas of high population density.

From the GLA projected data for 2015, the 4 wards in Redbridge with the highest population density are all in Ilford South, Loxford at 140 per hectare, Clementswood at 133 per hectare, Valentines at 102 per hectare and Chadwell at 103 per hectare. These levels are already high for an Outer London borough. The GLA average for Redbridge as a whole is 53 per hectare. Adding 6,000 units to the 3 wards of Loxford, Clementswood and Valentines would lead to population densities approaching 200 per hectare. This would be 4 times the average for the borough and in the wards with the greatest deprivation. These figures could be even higher as many illegal dwellings are present in these areas. How will this huge increase in population not exacerbate the problems that already exist in these wards?

Another objective is stated to be to improve the health and well-being of residents and to close the health inequalities within the borough. The Plan states that health inequalities are most pronounced between the borough's more prosperous north west and its southern wards. The reasoning in the Plan is that high density, high-rise housing 'regeneration' in the most deprived areas will be the answer to this health inequality. However, there is much research evidence that would indicate this is a simple inversion of the truth.

Professor Robert Gifford, Professor at the University of Victoria, British Columbia, carried out a comprehensive survey of the literature on high rise living. His findings strongly suggest that high-rises are less satisfactory than other housing forms for most people, that they are not optimal for children, that social relations are more impersonal and helping behaviour is less than in other housing forms, that crime and fear of crime are greater, and that they may independently account for some suicides. Living in high-density restricts children's physical activity, independent mobility and active play. Many studies find that child development, mental health and physical health are affected. They also find a likely association of high-rise living with behavioural problems. A lack of green space is also very much correlated with poor mental health outcomes. This Plan will, therefore rather than reduce, will exacerbate health inequalities in Redbridge to even higher levels than at present.

The vision does not mention the proliferation of illegal flat conversions; beds in sheds; and sub-standard, overcrowded Houses of Multiple Occupation in Ilford South. These have proliferated because people simply cannot afford anything better. The fact that Redbridge and Ilford South in particular has seen a huge increase in inward international migration, much higher than other areas of the country, has contributed to the stress on housing. Between July 2004 and June 2014, international migration contributed to over 46% of the borough's population increase.

The Redbridge Selective Licensing report (April 2016) details clearly the issues in Ilford South linked to this increase in migration.

In addition the placing of homeless individuals from outside of the borough into Ilford South by other councils is not mentioned. Often these homeless people have associated problems, which strain the already stretched services of the borough. There are many homeless people within the borough itself that need support but are being pushed out of the area due to lack of housing provision. The number of homeless households was a total of 2,304 at the end of March 2016 and the Council is currently spending huge amounts on temporary accommodation. 876 of the homeless are in out of borough housing, a 600 per cent rise on five years previously. These issues should have been important points in the vision.

The objective of encouraging cleaner air is advocated and yet pollution surveys in many of the hotspots for development in Ilford South have not even been carried out to inform the evidence base.

The vision seeks to encourage and maintain an appropriate mix of town centre uses and yet this is contradicted by the fact that huge numbers of housing units are assigned to town centres in Ilford South. The Plan states that the investment and group areas offer a range of investment opportunities with substantial capacity to accommodate new homes, jobs and much needed infrastructure such as schools and health facilities. This is simply not true. Where is the evidence that in all the areas of Ilford South earmarked for substantial housing that there is the ability to accommodate all these aspects alongside all the housing? There is little mention of where real jobs will be created and in which industries. Only 17% of residents work in the borough currently, thus we believe, Ilford South will become even more of a dormitory area and this strategy will not reduce but will increase the need for residents to travel to find work.

We feel this Plan will only exacerbate the current problems in Ilford South and force owner occupiers who can, to leave the area and thereby reduce even further community feeling.

THE LOCAL PLAN COULD BE CHANGED IN ORDER TO MAKE IT SOUND BY:

REDUCING THE NUMBER OF HOUSING UNITS IN ILFORD SOUTH AND
USING ALTERNATIVES WITHIN THE BOROUGH OR FORMALLY
REQUESTING THAT ADJACENT AUTHORITIES MEET THOSE NEEDS

UTILIZING EMPTY PROPERTIES FOR HOUSING NEEDS

EXPANDING PURCHASE AND REPAIR OF PROPERTIES

USING COUNCIL LAND TO BUILD TRULY AFFORDABLE HOUSING FOR
RESIDENTS

BUILDING MORE HOUSES AND LESS FLATS

THE EVIDENCE BASE IS POOR

PARAGRAPH 1.8;

LP1 (Spatial Development Strategy) ; LP1A (Ilford Investment and Growth Area); LP1B (Crossrail Corridor Investment and Growth Area); LP1C (Gants Hill Investment and Growth Area); LP2 (Delivering Housing Growth); LP3 (Affordable Housing); LP6 (Dwelling Conversions); LP7 (Back Gardens); LP13 (Hotels and Tourist Accommodation); LP18 (Health and Wellbeing); LP22 (Promoting Sustainable Transport); LP23 Cycle and Car Parking; LP24 (Pollution); LP34 (Managing and Protecting the Borough's Green Belt and Metropolitan Land; LP37 (Green Infrastructure and Blue Ribbon Network;

There are 22 sources of evidence listed on page 184 of the Local Plan. However on the Redbridge Local Plan Evidence Base online webpage, there are, today, 41 sources of evidence. This is a disparity which has caused much confusion for residents. It has been difficult to know what

to look at and where. Many of these documents have been uploaded very recently and it has made it extremely difficult in the 6 week consultation period to absorb the immense of information produced.

The Plan states that population estimates for the Plan period are approximately 293,000 (ONS 2014 mid-year estimate, updated figures for 2015 estimate the population to be 296,800). Based on the GLA population projections (short term migration scenario, 2014) the borough's population will grow by 65,000 to reach 362,000 by 2030 (mid year 2015 estimates suggest a slightly lower 360,882 by 2031). Some of this will be from natural population growth (e.g. associated with increased birth-rate and higher occupancy of housing) and some from construction of new homes.

These population projections do not take into account the effect of Britain leaving the European Union, given that Ilford South has seen huge increase in population due to inward international migration in the recent past. Between July 2004 and June 2014. international migration contributed to over 46% of the borough's population increase. The Redbridge Selective Licensing report (April 2016) details clearly the issues in Ilford South linked to this increase in migration, where much of this population has been accommodated. The projected population figures are, therefore, in a state of flux at the moment with the effects of Brexit difficult to predict but a reduction in inward immigration is a very possible outcome. The exact number will be difficult to say. This has not been taken into account within the evidence on population growth.

There are also significant discrepancies in housing data in terms of how many housing units have been produced in preceding years. We have been informed that there is no information for Street Naming and Numbering before 2010. Why this should be the case, we are not sure. The following table illustrates what housing data we have been able to collate.

YEAR	NUMBER OF HOUSING COMPLETIONS (from Preferred Options Report 2014)	NUMBER OF PROPERTIES (from Street Naming and Numbering) SNN	NUMBER OF POSTAL ADDRESSES (from Local Land and Property Gazetteer) LLPG	FROM GLA MONITORING REPORTS
2003/4	247			
2004/5	1351			
2005/6	794			
2006/7	1333			124
2007/8	607		2890 (first maintained)	122
2008/9	618		1043	110
2009/10	885		1349	100
2010/11	348	529 (no data before this date)	646	348
2011/2012	515	283	553	583
2012/13	271	231	652	301
2013/14	239	462	789	306
2014/15	No AMR report yet	308	563	
2015/16		559	921	

Thus as can be seen there is a great discrepancy between the SNN figures and the LLPG figures.

We were told that the SNN figures were for new builds and when we asked for a breakdown of the wards in which new builds had been situated from 2010/11-2015/16 we got the following information:

Ward	No. Properties SNN
Aldborough	188
Barkingside	50
Bridge	51
Chadwell	145
Church End	78
Clayhall	29
Clementswood	441
Cranbrook	93
Fairlop	33
Fullwell	117
Goodmayes	93
Hainault	172
Loxford	269
Mayfield	22
Monkhams	78
Newbury	95
Roding	108
Seven Kings	75
Snaresbrook	86
Valentines	112
Wanstead	37

We strongly feel there are many such discrepancies within the housing data, which we have not had time to investigate fully.

A question was posed at the Full Council meeting in September as follows: in the period 2007/08-2015/16, 9,406 new addresses had been incorporated into the Council's land and property gazetteer, but it is understood that, as well as new builds, there were also a large number of illegal flat conversions and 'beds in sheds' within this number. What was the number of these illegal flat conversions and 'beds in sheds' broken

down by wards? The answer received was: 'given the fact that such flat conversions and 'beds in sheds' developments were illegal and frequently occurring, it was very difficult to determine the exact number which had taken place in the Borough since 2007.' We strongly suspect that the vast majority of these illegal dwellings are in Ilford South. Without these figures, we have a poor analysis of population densities. In fact we cannot find any evidence relating to densities within the evidence base.

Another question was posed at the same meeting as to how many people who were homeless from both from inside and outside of the Borough reside in bed & breakfast or hotel accommodation within Redbridge? We know this to be a substantial number. The answer we received was that the Councillor in question did not have those numbers to hand but the questioner would be provided with a written response. We have, to date, not received this information. This information should be forming part of the evidence base. We know again that the majority of homeless people are placed in Ilford South.

Car parking stress surveys in areas of proposed dense development in Ilford South have not been carried out. We have been told that they are doing so now. The surveys are meant to inform the Plan. What use will they be at this juncture?

Pollution monitoring, in areas which have a history of having the most polluted streets in the whole of London ie in Ilford South, has not been done. A question was put to Council as follows: 'what were the current pollution levels of NO₂ for Ilford High Road, which was deemed in 2013 to be the second most polluted street in the whole of London; Chapel Road and Cranbrook Road, which were also found to have high levels of pollutants?'

The Councillor responsible replied that the Council did not currently have any air quality monitoring stations in Ilford High Road, Chapel Road or

Cranbrook Road, so was unable to provide precise figures for NO2 or any other pollutants in these roads. Modelled data indicated that there was an exceedance of 76 micrograms per cubic metre for NO2 on the centre of the traffic island of Cranbrook Road and High Road.

We feel modelled data is simply not enough. Air quality reports have been produced for the Oakfield, King George Hospital, Goodmayes Hospital, Ford Sports Ground and Billet Road sites but there are no air quality reports for any of the areas with less green and open spaces, such as Ilford Town Centre and the roads radiating from it.

There have been huge assumptions made in terms of Crossrail. There has been no real analysis of how much extra capacity there will be. No quantifying of numbers; no consideration of the extra demand further up the line up to Shenfield, where housing developments are being promoted. Developers are taking advantage of the Crossrail phenomenon by building housing units near stations along the line including Shenfield, Brentwood, Harold Wood, Gidea Park and Romford. This will obviously add to the passenger load. Chadwell Heath, Goodmayes and Seven Kings also have huge amount of development proposed near the stations. This will also add to passenger load. When Crossrail reaches Ilford, how much extra capacity will it have?

The Open Space Assessment (2016) has not been completed and is currently being done. This assessment should have been done before the Plan was completed. The Affordable Housing assessment has flaws as described in the section on affordable housing.

THE LOCAL PLAN COULD BE CHANGED IN ORDER TO MAKE IT SOUND BY:
DOING DETAILED, ROBUST ANALYSES OF POPULATION, HOUSING,
PARKING AND POLLUTION LEVELS IN ILFORD SOUTH AND BY
SCRUTINIZING THE TRUE IMPACT OF CROSSRAIL

THE DWELLING MIX WILL NOT ADDRESS LOCAL NEEDS

PARAGRAPHS 1.15, 3.11, 3.12, 7.7

LP5 (Dwelling Mix)

The Outer North East London Strategic Housing Market Assessment (2016) has identified a significant need for larger homes in the borough. Of the total Objectively Assessed Housing Need for market housing over the plan period 2015-2030 (21,545 homes) approximately 84% (18,203 homes) are for homes over 3 bedrooms or more. In addition, of the total Objectively Assessed Housing Need for affordable housing over the plan period (10,432 homes) approximately 64% (6,680 homes) are for homes over 3 bedrooms or more. The level of need for family housing is further demonstrated by the fact that the borough has the joint 2nd highest average household size in England and Wales of 2.8 making overcrowding a real issue. 23% of households consist of a couple with dependent children, higher than the London average of 17%, with the majority of these households in the south of the borough.

In light of this, the tenure mix table does not make sense. If 84% of housing needs are for units of 3 bedrooms or more, this would imply that only 16% are for homes of less than 3 bedrooms. Policy LP5 states that the Council will seek all housing developments to provide a range of dwelling sizes and tenures particularly focusing on the provision of larger family sized homes. It is highly problematic, therefore, that the Council bid for housing zone status was focused on Ilford Town Centre. The location of high numbers of housing units within small areas of land in the town centres can only result in high-rise 1 and 2 bedroom flats. These high-density, high rise units will simply not be able to provide the dwelling mix required.

The London Plan states that we need genuine housing choice. A vast majority of the new housing in Ilford South in the last 10 years has been

for small flatted developments. Redbridge councillor Paul Canal stated in the Ilford Recorder recently regarding developments in the town centre that he was concerned that the new units would not be appropriate for young families. "The vast majority are going to be one beds – buy to let. It will not provide the homes that our young families need to buy".

We feel the finance afforded by the Housing Zone bid should have been used to unlock a real Housing Zone in the borough, providing the houses identified as the major need for the demographic. The Local Plan is an extension of this seemingly senseless strategy and does not address the specific housing needs in the borough, particularly for families, but appears simply to be trying to meet housing unit numbers and to generate revenue for the council. If, as the council says, larger family homes are more conducive to more suburban environments, then surely we need to build more in the suburban environments than in the town centres.

THE LOCAL PLAN COULD BE CHANGED IN ORDER TO MAKE IT SOUND BY:
MORE UNITS NEED TO BE FAMILY AND ELDERLY FRIENDLY. IT NEEDS TO ADDRESS THE DWELLING MIX IDENTIFIED IN THE ASSESSMENT

IT DOES NOT DEMONSTRATE SOUND INFRASTRUCTURE DELIVERY PLANNING.

PARAGRAPHS 1.18.5; 3.24; 6.23;

LP1 (Spatial Development Strategy) ; LP1A (Ilford Investment and Growth Area); LP1B (Crossrail Corridor Investment and Growth Area); LP1C (Gants Hill Investment and Growth Area); LP2 (Delivering Housing Growth); LP10 (Managing Town Centres and Retail Uses); LP14 (Stimulating Business and the Local Economy); LP 17 (Delivering Community Infrastructure); LP18 (Health and Wellbeing); LP22 (Promoting Sustainable Transport); LP23 Cycle

and Car Parking; LP24 (Pollution); LP34 (Managing and Protecting the Borough's Green Belt and Metropolitan Land; LP35 (Protecting and Enhancing Open Spaces); LP37 (Green Infrastructure and Blue Ribbon Network;

APPENDIX 2; EVIDENCE BASE REPORT

The Preferred Options Report 2013 states that: The Council is also proposing that housing delivery will be firmly linked to the provision of new community facilities. New homes should not be built where an adequate supply of essential community facilities cannot be demonstrated, or where the Council does not have confidence that those facilities can be delivered in tandem with new homes.

In Ilford South there are already problems with the traffic congestion on roads, parking and overcrowding on public transport. The schools are also overcrowded and are being expanded, with loss of open space. This is making them too large and impersonal, detrimentally affecting children's wellbeing. There has been a 3 year downward trend of 7% in GCSE outcomes in Redbridge High Schools. There are huge catchments for doctors and there is already a deficiency of open space in the area. Where is the space for employment in the midst of all the housing. Where can leisure facilities be situated in an area of such open space lack?

In the Redbridge Local Plan it is not clear who is going to deliver the required infrastructure to support the proposed developments and there is a lack of a clear and detailed strategy for its implementation. What we have is extremely sketchy and unclear with no real dates of delivery and how it will integrate with delivery of housing. Too much infrastructure is labelled as borough wide, when the majority of housing development is very specifically allocated to the wards of Ilford South. Open space improvements, access to allotments, community, sports and library

facilities have all yet to be confirmed, are allocated borough wide and have no associated costs allocated in Appendix 2.

The Evidence Report states that the associated infrastructure costs have been calculated at £389,993,956.00. This is focused on known costs in Phase 1 of the plan (2015/6– 2020/21). This represents minimum costs as the costs of delivery at later plan stages, for example in relation to ongoing open space and community facility provision, are unknown at this time. Furthermore land costs in relation to schools provision have not been factored in as they will be highly variable depending on the mode of delivery. In addition, total costs of the Crossrail project have been excluded. Therefore costs over the life of the plan will be significantly higher.

This is extremely worrying. With so much of the education, health and community infrastructure in later phases of the Plan, will there be any finance for it. Thus, the housing will be in place in Ilford South, but the infrastructure to support it may not.

The Core Strategy 2008 Strategic Policy 10(b) states that: 'ensuring that large developments generating additional demand, only occur where adequate provision of schools, health, police and emergency and other support services can be made for new and existing communities. In particular, the anticipated growth of housing in Ilford Town Centre requires careful planning and co-ordinated support service delivery to keep pace with population growth. Growth will be phased and monitored to allow infrastructure to be put in place ahead of development'.

We have much empirical evidence that despite these reasonable words, this has not been taken place in Ilford South. In 2012, Cllr Jas Athwal, the current leader of the Council, expressed his concern stating that: 'Poor infrastructure planning is creating the "slums of the future" with too much strain being placed on hospitals, schools and drainage systems'.

Where are the youth clubs and hospitals? What we are doing is building the slums of the future.'

The developments in this period, such as the Icon Building and Raphael House were meant to provide money for highways, education, healthcare, social services, conservation and CCTV. The £877,748. and £598,487 for this from these developments has simply never materialized. The new Local Plan will, we fear, will build on the inadequate infrastructure of the past 10 years and multiply this deficit in Ilford South.

There are no visual plans of the infrastructure. We feel it is not advisable to have such a detailed plan for housing sites in Ilford South for all phases before having an equally detailed and robust plan for infrastructure for the same time scale.

The London Plan Policy 3.18 states that development proposals that co-locate schools with housing should be encouraged in order to maximise land use and reduce costs. Much of the proposed development in Ilford South simply does not have the space for this, thus where possible, schools are being 'expanded'. It has been reported that Redbridge has some of the most over-capacity schools in London. We know that super-sized primaries are clustered in the most deprived parts of the country, in particular east London and inner-city Birmingham and Redbridge is part of this. Many primary schools in Ilford South are now approaching pupil numbers of 1,000 with 4, 5 and even 6 forms of entry. Constantly expanding schools is making them overcrowded, with loss of precious, open space. This is making them too large and impersonal, detrimentally affecting children's wellbeing. There is a divide within the borough with these large primary schools nearly all situated in the South and smaller schools elsewhere. Where there are large numbers in other parts of the borough, there is both an infants and a junior school.

The Evidence Report states (6.11): feasibility studies are being undertaken on a number of other primary schools but the Council will need to wait until the outcome of these studies are known before they can advise on likelihood of expansions and the quantum of places arising. The Cabinet Update (October 2015) on Pupil Place Projections identified the limited capacity for expansion on existing sites and need to identify new sites to support future demand. Even with the delivery of schools identified above in Phase 1 of the Local Plan period and the temporary provision of additional classes, the actual number of new schools required will vary depending on the quantum of places delivered through either expansions (although opportunities for this are diminishing) and the size of schools delivered. Redbridge primary schools range from two to six forms of entry and secondary schools from six to twelve forms. But applying the average size of four FE for primary schools and eight for secondary suggests a need for the equivalent of four further primary schools and six secondary schools.'

It further states (5.23): 'the Council commissioned Cognisant Research to undertake the Redbridge Pupil Forecasting Study in 2013 to establish the Population Forecasts for new housing developments across the Borough. Based on the child yield for flats (likely to be the primary housing development type in the plan period) this would lead to an additional requirement for 7,157 pre-school places in total.

It is unclear what figure has been used for child yield for flats. Is it based on any survey work done within the area? Due to the very high costs of housing, more and more families are living in flatted developments. One only has to look at the Ilford Town Centre flatted developments to see this clearly. As 75% of the development in the plan period will be in Ilford South, it is reasonable to assume most of the demand for pre-school places will be in this area.

The report goes on to state that: (5.24) 'demand for early years and childcare provision in an area is generated by both new housing development and levels of local employment. The economically active population in Redbridge is 74%¹. In addition, working and careers often prefer childcare closer to their places of work so that they can respond quickly in an emergency. Only 17% of residents in work were employed in the borough according to the 2011. This means that not all of the pre-school places projected based on housing delivery will be required and this makes modelling future demand difficult.'

This is a puzzling statement. There is a huge focus on encouraging residents in new developments to use public transport. Do the authors of the report really believe parents will take their pre-school children on public transport to their place of work outside of the borough, without their own personal transport? It seems to us completely obvious that future demand for pre-school places will be very substantial.

The report continues by saying: 'there are no further plans for Children's centres and increased demand from new development will be met through the existing hub and spoke model. This is likely to mean an intensification of delivery in existing and new community facilities rather than bespoke children's centres.' This obviously assumes that the large influx of residents will have little impact on requirements for Children Centres. Can that really be the case?

The Local Plan identifies strategic sites for mixed use development, including education infrastructure this includes: (1) Crossrail corridor: Land around King George and Goodmayes has been identified for mixed use redevelopment including secondary school provision (site 46 in Local Plan Phase 1 2015 – 2020) (2) Crossrail corridor: Ford Sports Ground has been identified for mixed use redevelopment including secondary school provision (site 66 in Local Plan Phase 2 2015 – 2020) (3) Crossrail corridor: Land at Billet Road has been identified for mixed use

redevelopment including secondary school provision (site 99, phase 3) (4) Oakfield Forest Road, Barkingside has been identified for mixed use redevelopment including primary and secondary/ all through school provision (Site 123, Phase 3 2021-2025)

We feel, this reflects very poor phasing of the developments. When it is known that there is already such a huge need for school places, to place the developments with education infrastructure potential in phases 2 and 3 is puzzling. Surely, they should be at the forefront of the delivery, in order to install the vital educational infrastructure required.

As regards funding of the education infrastructure (6.28) states that: the costs of delivery of primary and secondary schools identified above will be met through Department for Education/ Free School funding and Redbridge's own budget. Delivery in the early phase of the Local Plan will be enabled by DFE allocation of £25,920,233.17 (this recent allocation is highest in London reflecting the level of demand). As identified in Section 3 of this report Redbridge CIL receipts have been applied to fund capital expansions to education facilities and this should remain a priority use.'

There is no quantification of how much will accrue from CIL receipts in the Plan period and where exactly they will be allocated. The cost of funding of Further Education is also unclear.

In terms of health infrastructure the Plan states that the Council is taking a proactive approach, actively engaging with Redbridge CCG which is committed to closer working to ensure health needs are met. Redbridge CCG will be working with the Council over the second half of 2016 to carry out detailed modelling clinical demand and activity against the projected housing growth areas to develop new models of care for service delivery across Redbridge. This work will be linked to the emerging clinical transformation strategies, in particular the Primary Care Transformation Strategy which will develop the 'locality clinical model' for the areas.

This is again very worrying. We have no trust that in this current climate of constraints on the funding of the health service, that adequate health facilities will be provided to cope with the additional population density. A&E services at King George Hospital are currently under threat of closure. A question was asked at the Full Council meeting on 15th September 2016 regarding health services in Redbridge. It pointed out that the A&E waiting figures for King George and Queens hospitals were at 82% for July, way below the safety target of 95%. The questioner suggested that part of the reason for failing to hit the targets is a shortage of GPs and urged the Council to write to Redbridge CCG asking them to provide a figure of how many GPs the borough is short of together with a plan to make good the shortfall. The response from the Council acknowledged the problems but stated that the problems were complex and in the whole health and social care system.

A new, untried 'locality clinical model' is not reassuring for residents. It seems irresponsible to situate such huge levels of housing without a tried and tested system for health service provision. If the model has teething or funding problems, what then?

The Evidence Report states that: health facilities identified as a priority for delivery in the growth areas (LP1A: Ilford, LP1B: Crossrail Corridor, LP1C Gants Hill, LP1D: South Woodford, and LP1E Barkingside) and a number of sites allocations identify health facilities as appropriate uses (Appendix 2, sites: 47, 65, 66, 67, 70,72, 80, 81,82, 133, 189, 191, 201, 208 (existing centre) and 217.

In Ilford South, 5 of these sites are in Seven Kings; 1 in Chadwell; 2 in Goodmayes and 1 in Newbury; the other 6 are in other parts of the borough. This is a ratio of 3:2 Ilford South to the rest of the borough. However the housing allocation is 3:1 Ilford South to the rest of the borough. Thus shouldn't a greater allocation be given to Ilford South?

When we look at the sites allocated, it becomes even more problematic.

Site 47 in Seven Kings is earmarked for:

retail/community/business/leisure/healthcare/residential/education

(primary school) on 0.62 hectares of land. Will all these uses be possible in this space? How big will the healthcare facilities be? Will there be any at all? The Pioneer Point development was meant to deliver a health centre which never materialized.

Site 65 in Chadwell has the uses of: retail/housing/healthcare on 0.15 hectares. What will be the quality and scope of this provision?

The rest of the sites are in phase 2. Site 66 in Newbury ward the Ford's Sports Ground, site 67, 72 and 82 in Seven Kings ward and sites 70, 80, 81 in Goodmayes ward. This, in our opinion, is poor infrastructure planning. These sites with health facilities should come in phase 1 in order to have the infrastructure in place for the incoming residents.

It seems to have been missed in the planning process that the vast majority of the developments in phase 1 are proposed for the wards of Loxford, Clementswood and Valentines, for which no medical facilities are indicated. Why is this? Will they be expected to go to Seven Kings?

The transport infrastructure programme is also very vague. The Evidence Report states that: 'capital investment from the Mayor of London/ GLA towards highway and public transport accessibility improvements in the Ilford Hill western gyratory area in connection with the Council's Ilford Town Centre area Housing Zone bid has been secured in principle and initial feasibility studies are currently being progressed to identify preferred scheme options and costs. Fully sourced funding packages to implement these measures will take some time yet to be worked up'. Yet the Council is happy to commit huge housing units to this area in the first phase. What if the funding is not secured? Or other problems arise?

The transport improvements are extremely opaque. They are very difficult to understand and there appears to be a great deal of repetition with public realm improvements cited over and over again.

It is also not at all clear what the cycling infrastructure will look like in the borough. £2,500,000 is allocated for a 'greenway connection' and yet the location appears to be the Roding Valley. Yet the River Roding Leisure Route Bridge giving access from Ilford Town Centre to the Greenway has yet to be confirmed. It is stated that: 'It is likely additional funding will be required to install cycle route linkages between the core Quietway (formerly Greenway) route and the council growth areas. In particular the possibility of securing sustainable access to the River Roding leisure route via a new connection towards Ilford Town Centre is also being explored. There is no confirmed funding yet to take forward this project.'

£917,000 is allocated for the Quietway cycle route, however, this is borough wide. There are no visuals to accompany the transport or cycling infrastructure proposals, which gives residents very little understanding of where road improvements and cycle paths are located. Thus, we fear, money for infrastructure will go to other parts of the borough while Ilford South will not have the transport improvements it so desperately needs and no real, safe cycling infrastructure as there simply won't be the room.

In the External Scrutiny Panel report of 22nd March 2016, overcrowding at bus stops in Ilford Town Centre near to Ilford Station was discussed. This was a particular issue for passengers with mobility issues or visual impairments. Even though, apparently £2m has been secured from Crossrail to be spent at Ilford, no real answer to the problem was forthcoming because it was stated by the Council that 'this was a very difficult issue to address'. Lack of land availability and funding were cited as issues. The only action was going to be that the footway was being widened slightly and the position of the two bus shelters would be altered

as space was limited due the proximity of the Ilford Hill junction.

Regarding the bus stop in the High Road outside Iceland, 'there was scope to widen the footway here but this would likely have implications for the taxi rank opposite. This would be examined further if additional funding could be secure in future.' This is the very area where huge amounts of housing development are proposed, with the concomitant increase in population.

The Evidence Report states that: the Council has secured in principle additional external funding from Transport for London (via the Crossrail Complementary Measures fund). Over the next three or four years, these funding combinations should enable substantial streetscape and pedestrian or car park enhancements in the close proximity of Ilford, Seven Kings, Goodmayes and Chadwell Heath stations. Even with this funding from Crossrail, overcrowding at bus stops near to stations apparently cannot be prevented. Thus, it appears, funding is not fully secure yet and the term enhancements could mean many things.

Woodford and Snaresbrook stations have over £300,000 allocated to them. Developments in theses area are not mentioned in the Plan and they are not part of the Crossrail route. It is unclear why they have been allocated this money.

The car parking standards are based on the assumption that the vast majority of people living in the new housing units in Ilford South will not own cars. This is a not a justified assumption, as can be seen in the car parking problems of residents in and around the recent town centre developments. No parking stress surveys have been carried out in Ilford South. We have been told by the Council that they are now doing so but the Plan is in its final stage. We feel that this is too late in the day. The Council states that the parking crises will be solved by people cycling, using public transport and hiring cars. This is a huge cultural shift which will take many years to come to fruition and, at the current time, an

unrealistic expectation of the residents. This change will need to be done slowly through education. The provision of adequate and safe infrastructure needs to be in place before people will be willing to make this change.

The Berkeley Group commissioned WSP to prepare a study which considers the use of car parking within residential schemes in London. Their conclusions were:

This research has found no relationship between car ownership and peak hour car use, and this is consistent with the findings from TfL's "Travel in London" report finding of stable car ownership levels but declining car use.

It suggests that many London residents who own cars decide not to use them for peak hour travel and will instead walk, cycle or use public transport. There appears to be no simple relationship between car ownership and car use, and anecdotal feedback from residents and car park managers confirms that many vehicles are stored by their owners for use in the evenings or at weekends.

A further positive outcome is that residential car parking can be provided in order to meet the level of car ownership, without generating significant traffic flows. This means that the problems associated with under-provision of car parking can be avoided, without undermining the cycling, walking and public transport use. This reflects the "appropriate balance" between development viability and excessive car parking provision being sought by the Mayor in London Plan 2011 Policy 6.13.

It has been found in many developments that an under-provision of residential parking results in overspill parking pressures and adverse impact on the surrounding community. Community consultations have highlighted this concern, such that proposals for low parking provision sometimes make it more difficult to gain local support for developments.

TfL's "Travel in London" report has identified that forecasting levels of car ownership involves a complex range of variables. There is a need for additional research to improve the understanding of residential car ownership so that future developments can be planned so as to avoid under-provision or over-provision.

The Evidence Report (9.13) states that: 'the Council has allocated £12m for improvements in Ilford Town Centre. The council is bidding for a further £10 million from TfL (Major Schemes) over several years to upgrade significantly the High Road 33 corridor between Cranbrook Road and Clements Road (east), and its Oakfield Road, Chadwick Road and Clements Road linkages. The Council has already secured £100,000 from Transport for London to progress the first stage of the project (design works).'

It is not clear what this £12m will be for. We know that the Council wants to build on Council owned land in Ilford Town Centre. Will this money be used to buy up land in order to build market rate housing?

The Report states that the revenue obtainable from CIL will be insufficient on its own to fund significant new major capital infrastructure items such as schools or area wide public realm schemes. The Mayor of London's Community Infrastructure Levy is purely for Crossrail and so cannot be used for other purposes. New Homes Bonus and the retention of business rates are also sources of funding. However, there is no quantification of how much New Homes Bonus and retention of business rates will yield to support infrastructure delivery. Relying on grant sources such as Heritage Lottery Fund, the GLA Outer London Fund will not be reliable.

The Open Space Assessment (2012) assessed that the NPFA standard is being met Borough wide; there are 4.54 hectares of recreation space per 1,000 population. However, this varies within the Borough. The Ilford South wards of Loxford, Clementswood, Mayfield, Seven Kings, Goodmayes and Chadwell have open space provision below the NPFA 36

standards. The most concentrated areas of deficiency are found around the Ilford Metropolitan centre; along the High Road; and around Newbury Park Tube station. All areas ear-marked for large amounts of housing development in this Plan.

The Evidence Report states that: 'in practical terms in a densely developed borough such as Redbridge, there are very limited opportunities to provide new open spaces of significant size.' This statement avoids the obvious point that Redbridge is only densely populated in certain areas, other areas are quite sparsely populated.

Redbridge contains 2000 ha of Green Belt which is 30% of the borough. Ilford South has an area just over 1,500 ha, with no Green Belt, as the last Green Belt areas in Ilford South have just been de-classified. The rest of the borough occupies an area of over 4000 ha, half of which is Green Belt. This should be stated within the evidence base.

The Plan hopes to mitigate the problem of lack of open space by seeking on-site provision of publicly accessible open space in areas of deficiency. Looking at what has been provided to date, we are dismayed to see there is hardly any. The concept of urban spaces is hard to visualize. Children, in particular, need real open space, where they can run and scooter and cycle. The obesity figures for children in Ilford South show the need for provision of open space for exercise. The Council is now undertaking an Open Space Assessment, after the Plan has been completed. Why not before?

London Plan Policy states that the Council should ensure that all children and young people have safe access to good quality, well-designed, secure and stimulating play and informal recreation provision, incorporating trees and greenery wherever possible. In preparation of the Local plan there should have been audits of existing play and informal recreation provision and assessments of need in their areas, considering the qualitative, quantitative and accessibility elements of play and informal recreation facilities. This has not been done.

It is stated that no new libraries will be created and investment is to be focused on intensification of existing uses and increasing access to this provision. This can only mean more people accessing the same provision. Thus where the population increases, there will be more demand for the same resources.

In responses to the Local Plan the Metropolitan Police have not identified the need for significant expanded facilities. This is surprising when we know from a recent local ward panel, local officers confirm that they are completely stretched in Ilford South, which has the greatest rates of crime and antisocial behaviour in the borough. There has been no stability in the staffing, with officers being redeployed to other areas within the borough. In fact the External Scrutiny panel on 22nd of September 2016 was a Community Safety themed meeting following on from a similar meeting on 22nd March. This was convened to discuss issues around Ilford Town Centre. For years the public has been reporting issues of anti-social behaviour with gangs of young people, drinking, taking drugs, fighting and playing loud music. The Police had made crowd dispersal attempts but the problems continued, often with the same individuals. Drug dealing was quite openly being carried out and the police did not seem to be taking it seriously when this was reported to them. Bag snatching and cash machine crime were also reported in the area.

The Borough Commander commented that: 'the police were aware of the problem. A lot of work had already been undertaken within limited resources to deal with the issues eg dispersal zones, but these could not be sustained on a long term basis. The Metropolitan and Transport Police did carry out an operation recently where they arrested some of the individuals involved. However this is an ongoing problem and often when one area is dealt with, the problems simply move to another one in nearby. Thus, even though, the Police may not think they need to expand their facilities, the residents would certainly want more police officers to cope with the current levels of crime, let alone any increase that may arise with the increase in population.

Thames Water confirmed to the Council in January 2014 that there is limited capacity within the existing sewers and there will be a need for network upgrades in order to service the planned developments in the Borough. However, due to the complexities of sewerage networks, they have been unable to determine the infrastructure needs at this stage. Engagement with Thames water will have to continue over the life of the Plan, but where there is a capacity problem and no improvements are programmed by the statutory undertaker, then the developer will need to contact the water authority to agree what improvements are required and how they will be funded and delivered. Any upgrades required will need to be delivered prior to any occupation of the development.

This will be a very piecemeal approach. What if the sewage infrastructure cannot cope? It does not make sense to us to put so much housing in one area maximising, the demand. We feel spreading out the demand would be a more reasonable option.

Iford is the 47th busiest station in the whole country, with 7.6 million entries and exits, up 11% on the previous year. We question how many extra passengers Crossrail will be able to carry, particularly at peak times. Trains are currently grossly overcrowded during the rush hour. We

question the benefits for commuters, if thousands more people from the proposed new developments, also use Ilford station. It is also anticipated that people from Gants Hill and Newbury Park will be arriving at Ilford to take advantage of Crossrail.

There have been huge assumptions made in terms of Crossrail and no real analysis of how much extra capacity there will be. No real quantifying of numbers; no consideration of the extra demand further up the line as developers take advantage of the Crossrail phenomenon by building housing units near stations along the line including Shenfield, Brentwood, Harold Wood, Gidea Park and Romford. This will obviously add to the passenger load. Chadwell Heath, Goodmayes and Seven Kings also have large amounts of development proposed near the stations. This will also add to passenger load. When Crossrail reaches Ilford, how much extra capacity will it have? Will it have enough to accommodate such huge increases in population?

We feel there is no flexibility in the Plan if it turns out, as is thought by many, that the extra capacity will simply help the overloaded trains to cope better with the current population level but will not have any great additional capacity.

THE LOCAL PLAN COULD BE CHANGED IN ORDER TO MAKE IT SOUND BY:

LOCATING HOUSING UNITS IN AREAS WHICH HAVE THE SPACE TO ACCOMMODATE THE INFRASTRUCTURE REQUIRED

GIVING MUCH GREATER DETAIL WITH INFRASTRUCTURE TIMESCALES LINKED TO HOUSING TRAJECTORIES. DETAILED VISUAL PLANS REQUIRED.

NEEDS TO HAVE INFRASTRUCTURE IN THE FIRST PHASE

THE POLICY ON AFFORDABLE HOUSING WILL NOT ADDRESS THE HUGE CRISIS OF AFFORDABILITY IN THE BOROUGH

PARAGRAPH 3.91; 3.94; 3.10.5;

LP3 (Affordable Housing); Local Plan Viability Assessment and Community Infrastructure Levy Review (2015)

It is stated in the Plan that building new homes that are genuinely affordable for residents is a key priority for the council. We are glad to hear this as Redbridge unfortunately is a borough in which: homelessness is increasing and is at one of the highest levels in London; it currently has the second lowest level of affordable housing provision in London; it has the highest average prices for housing of the outer London boroughs. This is despite Redbridge having a 50% affordable housing target in its current planning policy.

For the Council to state that it has undertaken a Local Plan Viability Assessment and Community Infrastructure Levy Review (2015) which shows only 30% 'affordable housing' is possible at 80% of market rate, is very worrying. With the rent for a 2 bedroom new build flat at around £2,000 per month, it will be £1,600 at 80%. How will this help the affordability crisis? A commercial firm was used for this analysis; this was not an in-house piece of research.

Even with finance from the Mayor's Housing Zone fund, the Council reports that the Housing Zone will provide 500 housing units by March 2021. This is just 25% of the total housing units. 25% is half of the level of affordable housing advocated in the Core Strategy 2008, which is the current planning document. Why has this level of affordable housing been accepted for the Housing Zone when the current policy is 50%? Furthermore, the vast majority of the housing units in the Housing Zone will be in the form of small flats, which we know are not the main need in the borough. The Sainsbury development of 700 flats which is part of

the Housing Zone was offering 4% affordable units at 80% of market rate in their application. This was rejected at the Council planning meeting earlier this year but only by a very narrow margin of 6 councillors to 5. Of course, Sainsbury are very likely to appeal this decision.

The Plan states that meeting the level of genuine affordable housing need in the borough would severely undermine the viability of the majority of housing developments and thus undermine the overall housing delivery. Thus it seems the priority for the Council is to meet housing unit numbers, and not to provide affordable housing for the residents.

In response to a question at the Full Council meeting in July it was stated that family social rented, family affordable rented and family intermediate rented units would be in the new builds. We asked for clarification of what these definitions meant at the September Full Council meeting?

We were told that social rented housing was owned by local authorities or private registered providers, for which guideline target rents were determined through the national rent regime. It might also be owned by other persons and provided under equivalent rental arrangements, as agreed with by the Council.

Affordable rented housing was let by local authorities or private registered providers of social housing to households who were eligible for social rented housing. Affordable Rent was subject to rent controls that required a rent of no more than 80% of the local market rent (including service charges, where applicable).

Intermediate housing included homes available for sale or rent at a cost above social rent, but below market levels. These could include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rent.

We find this information very confusing. There is no information about social rent within the Plan, yet it is stated that family social rented units

will be in the new builds. How is that possible, when the only target in the Plan is 30% affordable housing defined as 80% of market rate? The definition for intermediate housing rent is also extremely confusing. What level is it set at and what percentage of it will be in the new builds?

We also challenge the methodology and conclusions of the Viability Assessment and find it to be grossly inaccurate. 21 sites have been chosen which the Council says are a representative sample of the identified 173 sites in the document; however there are actually 217 sites in the document. One of the representative sites, we cannot actually find in Appendix 1 at all - site no. 10, 187-207 Ilford Lane. In addition site no. 17 is stated as being one site when actually 245-247 Cranbrook Road is Wycliffe House which is a listed building and has been given planning permission for 19 residential flats. To put 245-275 as one application is misleading. 248-275 must be one or more other sites. Surely all sites should have been considered on an individual basis?

In the key findings of the Viability Report, it states that the results of this study are reflective of current market conditions, which will inevitably change over the medium term. Why then, are the vast majority of these 'representative' sites in phase 2 of the Plan and even include Oakfield, which is in phase 3 of the Plan. There are a mere 3 sites which are in phase 1.

In an answer to a question about phases at the Full Council meeting in September, the answer was given that sites in phases 2 and 3 of the Plan were those that the Council believed held potential for development, but current use, development constraints, or liaison with landowners, indicated they were less likely to come forward in the short term. Generally, they included sites where acceptable development proposals had not come forward to date. Therefore, surely phase 1 developments should have been used to make this study as accurate as possible?

We believe the sites chosen skew the findings and the housing mix. They include the very large sites in more open areas, which are more likely to provide houses instead of flats. This, thus skews the findings to enable the report to state that: our appraisals incorporate sufficient floor space to accommodate the council's emerging housing mix in full. This is simply not the case in reality. Most of the developments proposed will be in the form of 1-2 bedroom flats in Ilford South, not in open areas, especially in phase 1. These are areas where the accommodation prices are currently soaring due to the 'Crossrail' effect, which must have a huge impact on profit margins.

Pioneer Point built in 2009, which is put forward as a successful development in the Plan and a model to follow has not yielded any affordable housing or money in lieu. In 2014, the Council agreed that the Pioneer Point developers could delay payment of £5m for affordable homes, 10 years after the site was given planning permission. Surely, we should learn from the past and not repeat the same mistakes. The company which was responsible for the Pioneer Point application, Montagu Evans, is the same company now handling the current Harrison Gibson proposal for over 300 flats in Ilford High Road. We wonder how many affordable units will be offered this time? In 2014, figures obtained by the Ilford Recorder also showed that the Council is still awaiting £3,441,597 in Section 106 payments from the past decade, from high rise developments such as Raphael House and the Icon Building.

Even with the 30% at 80% of market rate 'affordable housing' level proposed, there still 'get out' clauses in the Plan. It states that: 'there will be assessment on the level of affordable housing on a site by site basis. Proposals will need to provide a viability assessment in order to justify the level of affordable provision on each site should proposals be below the 30% policy requirement.'

THE LOCAL PLAN COULD BE CHANGED IN ORDER TO MAKE IT SOUND BY:

HAVING A HIGHER AFFORDABLE HOUSING TARGET LINKED TO AVERAGE INCOMES – WITH NO GET OUT CLAUSES, AS THE MAYOR OF LONDON ENCOURAGES

THE COUNCIL SHOULD ENGAGE ROBUSTLY WITH THE NEW MAYOR OF LONDON'S 'HOMES FOR LONDONERS' PROPOSALS.

COUNCIL LAND SHOULD BE USED TO BUILD AFFORDABLE HOUSING FOR LOCAL PEOPLE, NOT FOR PRIVATE, MARKET RATE HOUSING

ALLOWING HMOs (HOUSES OF MULTIPLE OCCUPATION) AND CONVERSION OF HOMES TO HOTELS IN ILFORD SOUTH WILL LEAD TO FURTHER DECREASE IN THE HOUSING STOCK AVAILABLE FOR LOCAL NEEDS

Paragraphs 3.8.14

LP6 (Dwelling Conversions), LP7 (Back Gardens), LP13 (Hotels and Tourist Accommodation)

Huge numbers of illegal flat conversions, 'beds in sheds' and HMOs have been allowed to proliferate over the last ten years in Ilford South, adding greatly to the problems of overcrowding, anti-social behaviour, drugs, crime and fly-tipping, changing the character of the area. This situation has arisen due to unscrupulous landlords profiteering from the shortage of affordable accommodation and the weakness on the behalf of Redbridge Council to challenge and enforce planning law. This is the only affordable housing available for a great number of people. It is affordable only by being illegal, sub-standard and overcrowded. The housing in the Plan will not be affordable for people living in these conditions. Allowing the further conversion of houses to HMOs and hotels and allowing the use of buildings in gardens for housing in Ilford South, which the Plan does not prohibit, will continue to lead to the degradation of the area.

As of Oct 2013 1,500 properties in Redbridge were empty. The small amount allocated by the Council for purchase and repair of properties was not even spent last year. The Council appears to have a very narrow focus on new builds which cannot seem to provide any real affordable housing and overlooks other ways which may achieve a better outcome.

The Council states that for 2014/15, 28 affordable homes were delivered. In the Full Council meeting in September, the question was asked about how residents come to know about the affordable housing available in order to buy it. The reply was that when a development started, their advertising would tell everyone exactly what they needed to know. However, when we have tried to ask developers about any affordable housing provision, we have found it extremely difficult to know who to contact and if we finally do manage to do so, we have been told that this information will be given at a later date. Thus, we question whether any housing at 80% of market rate has been delivered at all as we have no evidence of this. The Council does not monitor who has obtained this housing. It appears they have left this issue to the developers, who, we fear may not have taken this issue very seriously.

THE LOCAL PLAN COULD BE CHANGED IN ORDER TO MAKE IT SOUND BY:

NOT ALLOWING ANY FURTHER HMOS, BEDS IN SHEDS AND
CONVERSIONS TO HOTELS IN ILFORD SOUTH

FOCUS MORE ATTENTION ON BRINGING EMPTY PROPERTIES INTO USE,
THEREBY UTILIZING EXISTING RESOURCES.

WIDENING PURCHASE AND REPAIR.

THE TALL BUILDINGS STRATEGY IS POORLY THOUGHT THROUGH

PARAGRAPHS 3.3.3; 5.2, 5.4; LP26 (ACHIEVING QUALITY DEISIGN); LP27 TALL BUILDINGS, LP29 (AMENITY AND INTERNAL SPACE STANDARDS)

The Plan states that the setting of new homes is also important. Homes should not be crammed in at such high densities that people feel overcrowded. The public realm must not become a concrete jungle. However it then contradicts itself completely by advocating policies which will do just that. Many residents in Ilford South, particularly those in flatted developments in Ilford Town centre, already do feel they live in a concrete jungle. The addition of the development proposed in the Plan will exacerbate this situation to intolerable levels.

The Plan states that town centres are more conducive to higher density and flatted development as they are highly accessible and provide a range of local services. However, if they are already highly densely populated, a saturation point will be reached and we feel in Ilford Town Centre this point has been reached.

In 2008 Redbridge Council published a planning document called the Core Strategy setting a target of building 9,050 new homes over a 10 year period. Ilford was again to bear up to 50% of these new homes. The new builds included Icon Tower, Spectrum Tower, Pioneer Point, Raphael House, Roden Mansions, Centreways, Invito House – all large tower block developments. There has been no onsite provision of accessible open space in these developments where many families live. They are simply not suitable housing for families or the elderly. Pioneer Point, Gabrielle House and Invito House have huge structural issues and will have scaffolding erected around them for years to come, as repairs are being carried out. The reasons for the repairs are not clear, speculation ranges from sinking foundations, to leaking roofs, windows and doors, to unsuitable glass in windows shattering.



GABRIELLE HOUSE

The Plan states that 'tall buildings improve the built environment within the centre, the most notable example being Pioneer Point'. To our knowledge, Pioneer Point is a building which is almost universally disliked by the residents for being overbearing and out of character with its surroundings in terms of scale, massing and height. It had a wind tunnelling study done at the time when its application was being considered, which reported it would not have an adverse affect on the environment. However, in reality, it has a huge adverse wind tunnelling affect, with particularly the elderly, scared at times to be near the building for fear of being swept away. We feel we should not use Pioneer Point as a precedence for more 30 storey tower blocks in the town centre.

Unfortunately, many of the Ilford sites identified for development in the draft plan, are said to be suitable for dense, high-rise accommodation.

Many of these developments, like Pioneer Point will be overbearing and out of character with the surrounding buildings in terms of scale, massing and height. This approach we believe will exacerbate the many existing problems of an already crowded environment, along with the associated problems relating to the amenities of local residents, in terms of overshadowing, overlooking, and wind tunnelling. The policy standards of LP26 have been and, we fear, will continue to be flouted in planning decisions with little regard to the amenity of existing residents.

The Plan states that the council is currently developing an Ilford Town Centre framework. We feel the framework should be in place before the details of this Plan are hung onto it? A public realm improvement is also meant to start this year. We feel this should have been integrated into the plan and this approach is far too piecemeal.

The policies for the town centres do not focus on the range of activities there should be. The emphasis on housing is overwhelming. Retail, leisure, commercial, office, tourism, cultural and community services are mentioned very briefly. Using the Icon Tower and Pioneer Point as examples, it can be seen how the ground floor services do not provide the vibrant outlets for other uses they are supposed to.

THE LOCAL PLAN COULD BE CHANGED IN ORDER TO MAKE IT SOUND BY:
JUSTIFYING THE REASON FOR A TALL BUILDING ON A CASE BY CASE BASIS – NOT SPECIFYING A PARTICULAR AREA FOR THEIR LOCATION.
HAVING ADDITIONAL SAFEGUARDS TO ENSURE QUALITY DESIGN IS ADHERED TO.

THE TIMESCALES ARE NOT DELIVERABLE

LP1 (Spatial Development Strategy) ; LP1A (Ilford Investment and Growth Area); LP1B (Crossrail Corridor Investment and Growth Area); LP1C (Gants Hill Investment and Growth Area); LP2 (Delivering Housing Growth); LP9 (Ensuring the Future Vitality and Viability of Town Centres); LP10 (Managing Town Centres and Retail Uses); LP11 (Managing Clustering of Town Centre Uses); LP41 (Delivery and Monitoring)

APPENDIX 3

The Council states that a range of factors have been used to determine the phasing periods in the Draft Redbridge Local Plan. Sites included in phase 1 of the Plan are those that the Council considered to have a reasonable prospect of being developed by 2020. It therefore included sites with planning permission, sites where planning applications had been registered, and sites where Housing Zone funding was helping unlock delivery.

Sites 4, 5, 6, 7, 8, 9, 14, 15, 17, 18, 19, 20, 23, 27, 46, 47, 51, 58, 64, 65, 138, 139, 141 are in Ilford South wards with no current planning application or new permission, which have been placed in phase 1. There is 1 site in Hainault - site 163 and 1 in Bridge - site 171 which also do not have planning permission and have been placed in phase 1.

Ilford South is already allocated the bulk of the housing in phase 1, with 45 sites with consent granted, including one which is erroneously allocated to Fulwell ward in Appendix A when it is actually in Valentines ward – site 176 and one placed under the Barkingside area when it is actually in Mayfield ward – site 127. These 45 sites account for 2,649 of the housing units. 37 sites with consent granted in the whole of the rest of the borough, account for 1,298 units in phase 1. Thus looking at the sites with consent granted, Ilford South is accounting for twice as many units as the whole of the rest of the borough. Housing Zone funding is for

2,000 units. These units are already accounted for within the 45 sites with consent granted.

It seems to us that it would make sense for sites outside of Ilford South without current planning permission to be placed in phase 1 rather than the 23 cited above within Ilford South. This would bring a little equity to this allocation and produce a more realistic timescale for delivery.

The timescales advocated within the current Plan are not practicable. The Plan proposes a high concentration of building sites in a number of limited areas, coming on stream at the same time. We fear, it will turn certain areas into permanent building sites for years. The phases give large amounts of development to Ilford South in phases 1 and 2 and very little in phase 3, while the rest of the borough has more even numbers in each phase including phase 3. There is no housing trajectory within phase 1 indicating which developments will be first and which later.

There is also no risk analysis of the strategy and policies to demonstrate robustness and to show how the plan could cope with changing circumstances. eg. if:

- The timescales for Crossrail slip
- The developments occurring at the same time have a negative effect on one another in terms of restricting movement and access.
- There is a catastrophic negative effect on the retail function of the town centres caused by the multiple building works
- Money for infrastructure does not materialize

No remedial actions appear to have been reflected upon, if the policies need adjustment.

The monitoring framework linked to timescales is also very vague, apart from the numbers of new dwellings per year. It is not clear how targets related to employment; empty properties; providing a range of housing choice; resisting the loss of larger family sized housing; provision of new community infrastructure in a timely and efficient manner in appropriate locations to support population will be measured (by when, how and by whom).

In promoting a green environment 3b in Appendix 3 states: amount of new residential development within 30 minutes public transport time of: a GP; a hospital; a primary school; a secondary school; areas of employment; and a major retail centre.

It is not very clear how the 30 minutes public transport time will be measured. Does it matter if: the GP, schools and hospitals are oversubscribed; there are areas of employment but no jobs? It is not clear what counts as a major retail centre.

Also the target: 'maintain 2.69ha of green space per 1,000 persons in Redbridge to ensure residents quality of life and access to open space' is confusing. Is this an average over the whole of Redbridge? If so, it is a meaningless target, given there is a great expanse of Greenbelt in certain parts of the borough, which leads to high average green space per person levels within the borough as a whole. The low levels in certain areas will not be discernible through this approach.

The target of 'providing an excellent transport network to enable local residents to access jobs locally and within London and Essex' is also very vague as is 'reducing dependence on the private car, promoting walking, cycling and use of public transport.' How will these be measured?

THE LOCAL PLAN COULD BE CHANGED IN ORDER TO MAKE IT SOUND BY:

CHANGING THE PHASING ALLOCATIONS FOR DEVELOPMENTS, WITH THOSE IN ILFORD SOUTH, PARTICULARLY THOSE WITHOUT PLANNING PERMISSION, PLACED IN LATER PHASES TO ALLOW THE INFRASTRUCTURE AND PUBLIC SERVICES TO BE IN PLACE TO SUPPORT THEM.

HAVE MEASURABLE MONITORING TARGETS