

**Consultation Response to the Inspector of the Redbridge Local
Plan (2015-2030) on the Following Issue**

Issue 1

**Have the relevant procedural and legal requirements been met,
including the duty to co-operate and those required by the Conservation
of Habitats and Species Regulations 2010?**

**1. WHY THE REDBRIDGE LOCAL PLAN IS NOT LEGALLY
COMPLIANT?**

- 1.1 The Planning and Compulsory Purchase Act 2004 (as amended) section 19(3) Regulation 18 states that all Local Development Scheme (LDS) documents must be produced in accordance with the Statement of Community Involvement (SCI). The Redbridge Local Plan consultations have not done so. The Consultation Statement deliberately downplays the concerns of Ilford South whilst highlighting the concerns of other areas.
- 1.2 For consultation to be meaningful the Supreme Court has stated that the consultation must be at a time when proposals are still at a formative stage; that the proposer must give sufficient reasons for any proposal to permit intelligent consideration and response; and that adequate time is given for consideration and response. This has not been done in relation to Ilford South.

- 1.3 The Sustainability Appraisal (SA) process has been deeply flawed and does not show that the plan rests on a credible evidence base, including meeting the Planning and Compulsory Purchase Act 2004 (as amended) requirement for keeping matters affecting the development of the area under review. The consideration of alternatives has lacked robustness, with several SAs carried out to justify the Plan, not to inform it.
- 1.4 There is a lack of Equalities and Health Impact Assessments leading to the Council not fulfilling its public sector equality duty. Redbridge is a highly unequal borough in terms of affluence, with 11 neighbourhoods categorized as some of the most deprived in England and 11 neighbourhoods in the least deprived. The wards in Ilford South are those which are the most deprived and this also correlates with a greater concentration of people from the ethnic minorities. This Plan will adversely affect mostly residents of Ilford South.
- 1.5 There has been procedural irregularity (The Act Section 24 Regulation 21). Redbridge Council should have confirmed that the representations submitted with the plan are legally compliant with the Regulations, i.e. have been made within the dates set out by the LPA for receipt of consultation responses. However we do not believe this has been done, in relation to representation by the GLA. The response received from the GLA to the regulation 19 consultation was outside the 6 week deadline, nearly two weeks late. The fact that the respondent was Mr Stewart Murray is also troubling, as he was the Chief Planning Officer for Redbridge when the first unsatisfactory consultation on the Local Plan in 2011 took place. We are also concerned that Mr Murray left the GLA at the end of October 2016, two weeks after submitting his response, to

join G.L. Hearn, a development company. We feel there is a substantial conflict of interests as G.L. Hearn are interested parties in the development of Tesco at Goodmayes.

2. CONSULTATION

2.1 The SCI(1.2.2) states that: 'In terms of the Local Development Framework, the involvement of communities should be front-loaded, which means there should be more active involvement of communities earlier in the plan preparation process. It also states SCI (1.5.2): 'The Council needs to ensure that all of the community have the opportunity to help shape the area they live in'. The SCI (2.3.3) goes on to further state that: 'Consultation will be 'fit for purpose'. The Council will ensure that appropriate levels of resources are allocated to involve the community'.

2.2 In Ilford South, the vast majority of residents only become aware of the Local Plan in 2016. The Plan, as currently constituted, will affect this area most with at least 70% of the housing units being allocated to it. Consultation with residents in the area where the vast majority of the units are to be situated should have been an absolute priority. This lack of meaningful consultation has meant the majority of Ilford South residents have had to consider a Plan in the last stage of its development. It is obvious that they would have been involved much earlier in the process had they known about the Plan and its immense implications. Residents in more affluent areas with greater owner occupancy and supportive councillors have been involved in the consultation process much earlier and have managed to draw attention to their site specific issues, while the main thrust of the Plan has been devoid of scrutiny. Numbers of respondents seem to be more important to the Council than the issues that are brought up.

3. INITIAL CONSULTATION (2011)

3.1 This was a very superficial consultation, designed to give the Council the answers they wanted rather than to actively engage with the views of residents. There are very few responses to the 2011 consultation, with only 33 separate consultees responding with 89 comments. It is not clear who these consultees were and how many were residents of Ilford South. The only consultation with resident groups appears to be 1 presentation to each Area Committee. It is not reported how many people attended these committees or who they were.

3.2 The extensive engagement techniques mentioned in the SCI, particularly for Hard to Reach groups were not carried out at all. Ilford South, as being the area primarily affected by the Plan and with a concentration of Hard to Reach Groups, should have been a focus of engagement. Issues of language would have obviously arisen. However, there were no public meetings or one to one meetings with Key Stakeholders of Hard to Reach Groups. There were no surveys/questionnaires/interviews to measure attitudes and opinions and to collect facts and statistics to provide qualitative information of what people think and why. There were no focus groups, workshops or Redbridge Citizens Panels to represent a cross section of the community on particular issues. It is clear the Council did not want a wide-ranging consultation contrary to the professed aims within the SCI.

3.3 The publicity for the 2011 consultation was primarily a leaflet which was apparently distributed to everyone on the Council's Planning Policy Consultation database and placed in all the libraries in the borough. The Consultation Statement (CS) does not state who was on this database and how many of these were residents of Ilford South, apart from the Area Committees. We do not believe any black and minority ethnic, senior citizens, youth, faith-based, community and voluntary sector

groups, and organizations representing people with disabilities based in Ilford South were contacted? We also do not believe that anyone took up the offer of free translation of the 2011 leaflet.

3.4 The SCI states that 'the Council will produce planning documents and consultation materials in plain English, avoid the use of jargon and provide concise summaries of longer documents as appropriate'. The SCI also states that it will avoid the use of excessively small type print in published materials and make use of coloured graphs and diagrams where this will simplify communication. The materials utilised in the consultation such as the leaflet, newspaper notification and letter are of a very poor standard in relation to these criteria. The public notice in the Yellow Advertiser is totally inadequate both in terms of the paper not being read by anyone and the layout of the notice. It is highly unlikely any of the residents of Ilford South saw it and if, by chance they did, would understand what it was about. Even the website entry shows a total lack of commitment to communicate the essential meaning of the consultation and the information sought.

3.5 The leaflet was the major document giving information and was not fit for purpose for many reasons. On one side of the leaflet, the Council omits the use of the word housing and instead uses the word growth, which is a confusing term, unlike the word housing which is clear to all. The leaflet states that it is reviewing its local plan which sets out where, when and how growth may take place across the borough. It wants to find out what new issues are emerging, which existing policies are important to residents and which ones need changing and which ones are working well and can be left alone. This presumes that the people reading the leaflet will know what the term 'growth' means and have a knowledge of what policies the Council has. These are totally unjustified assumptions.

3.6 The other side of the leaflet gives lots of technical information and there is so much unnecessary detail that it is not clear what the essential points of discussion are within the text. It is designed to confuse people and uses leading, closed questions which avoid the main issues. The issue of where to place housing is not mentioned, when it is the single most important and contentious part of the Local Plan.

3.7 The 2011 consultation responses are not given on the current Redbridge website. Fortunately we have print outs of some of the 2011 responses.

3.8 There are repeated concerns about the preponderance of new build high rise and densely built 1 and 2 bedroom flats. Issues include the effect of the high rises on population density and structure, traffic congestion, lack of amenity land and social problems. There are also repeated concerns about the conversions of larger family houses into flats. The response to this from the Council is: **'Reference made under 'Meeting Housing Need' to the potential to limit new flats to town centre locations'**. This is not a meaningful response. The respondents were not specifying any particular part of the Borough where flats had been erected. They were stating their concern at all high rise flat building. In fact most of the flat building that had hitherto taken place in the preceding years had already been in Ilford Town Centre. This issue should have triggered baseline evidence gathering about where the new builds were situated; population density; traffic congestion; rates and locations of conversions; and open space requirements to inform the SA. This did not take place.

3.9 Another response states that: 'In-fill development should be located in areas where the infrastructure could be provided. Is there potential for higher density residential development around Hainault, Fairlop and Barkingside stations?' This has no response given. Another respondent identifies land to the north of Forest Road that he considers should not be

classified as greenbelt and would, therefore, be available for housing. The response from the Council is: **'Investment Areas identified that included some release of green belt that would not harm green belt purposes'**. The areas that have been proposed by the consultees are not directly addressed in the response. Instead the Council goes on to state: **'Policies to be developed on protecting remaining green belt under the theme of Protecting and Enhancing Boroughs Assets'**. The Council is more concerned with protecting the green belt rather than using the responses to consider other areas it has not hitherto known about. These should have been part of an alternative at least to be weighed up impartially against other choices in the 2013 SA.

3.10 The issue of schools being too big and the need for new ones to be co-located with housing is brought up as an infrastructure issue. The response from the Council is very bland: **Reference made to supporting new and expanded community facilities at a variety of locations under 'Delivering Community Infrastructure'**. **Recognition that housing delivery is firmly linked to the provision of new community facilities under 'Meeting Housing Need'**. This issue should have triggered some recognition of the need to collect some baseline evidence regarding infrastructure provision to inform the SA.

3.11 The response asking: 'Can Councillors in one part of a borough vote through a development in another part of a borough that solves a problem in their wards but is detrimental to the interests of residents in the other part (much as it is perceived happens at present)' has no response. This should have triggered an understanding that baseline evidence needed to be focused at the intra-borough level of wards to ensure biases were not taking place.

3.12 The responses by the Council as shown in the CS, where given, do not address the issues and do not feed into a consideration of alternatives.

3.13 In addition SCI (5.1.3.) states that: following each formal period of community engagement, a Consultation Statement will be prepared. The Consultation Statement will include details of who was consulted, how the consultation was undertaken, a summary of the main issues raised and how the Council used the comments to help shape the Document. The Consultation Statement will be available for public inspection as soon as is practicable after the formal period of engagement has ended. In terms of Development Plan Documents, the consultation Statement will be updated and republished with the Preferred Options Report and a Statement of Compliance will accompany each submission of the DPD to indicate how the Council has responded to the issues raised.

3.14 SCI (5.1.5) states that; 'All comments received will be reported to the relevant committee or full Council, along with an officer recommendation on the action to be taken to address the issue raised. The Committee will then make its decision'.

3.15 SCI (5.1.6) states: 'All those who made representations will be advised in writing of the Committee's decision and how their views were taken into account'.

3.16 SCI (5.2.1) states: 'a statement on the overall level and methods of public engagement and consultation will be made in relation to each milestone'.

3.17 SCI (5.2.1) states: 'stakeholders will be consulted on their level of satisfaction with the engagement process'

We have no evidence to indicate that any of this happened.

4. PREFERRED OPTION 2013 CONSULTATION

4.1 After 2011, we have a long period where there is no further progress. Then in 2013, a Preferred Options report and Sustainability Appraisal Scoping Report 2013 are produced.

4.2 The SA (2013) should have outlined the reasons the alternatives were selected, the reasons the rejected options were not taken forward and the reasons for selecting the preferred approach in light of the alternatives. It should have provided conclusions on the overall sustainability of the different alternatives, including those selected as the preferred approach in the Local Plan. Any assumptions used in assessing the significance of effects of the Local Plan should also have been documented.

4.3 In fact the SA (2013) document is one which displays a complete lack of depth, analysis and rigour. It is not even clear what, if any, alternatives are being considered. The various investment areas are not named, the amount of housing allocated to each one not mentioned, strategic sites not referenced, baseline evidence not referred to and a completely 'broad brush' approach adopted. It implies that all the investment and growth areas will be affected equally. The findings of this report cannot be held to be valid, as it has made no acceptable attempt to identify, describe and/or evaluate the likely significant effects on the environment of implementing the preferred option/or any reasonable alternatives. Given this, the conclusion that the preferred option of concentrating growth in the town centres would be unlikely to have any sustainability implications cannot be relied upon.

4.4 This Preferred Options Report is also a very dense document making it very difficult for residents to understand. There is no synopsis of the major points about housing allocation and very little support to engage with the consultation.

4.5 However, there are some responses related to Ilford South, which again like the 2011 consultation are completely ignored. The SCI procedures are again not followed. The issues identified are: a bias in placing development in the south of the Borough leading to reduction in the quality of life; Ilford especially suffering from overcrowding and traffic congestion and general decay; lack of open space which will get worse; the preponderance of poor quality, high rise flats which are an overdevelopment causing problems; the need for a mix of dwellings particularly family sized housing; concern about the proliferation of hotels in residential roads; strain on infrastructure including transport; impact of school expansions and shortfall of play space; size of flats not being adequate; flat conversion need to be controlled; problems with HMOs; need for cultural, community, health, youth and leisure facilities and secular meeting rooms; need for car parking even if near to public transport; Council should review occupancy and child yield from high density flatted developments as it is higher than they think; future housing need and infrastructure requirements calculated incorrectly which needs review and surveys done; empty properties need to be brought into use; King Georg Hospital and Redbridge College sites should be designated as special health/leisure areas to address existing deficiencies.

4.6 The Consultation Statement responses again show a downplaying of these concerns by the Council and none of these issues feed into any further consultation the Council does. In fact Ilford South is not mentioned at all in the next SA in 2014. It has been accepted by the Council that development in Ilford South is the preferred option and the concerns of residents can be totally ignored.

5. THE 2014 CONSULTATION

5.1 The 2014 consultation is a complete travesty, with the SA excluding the area which has the majority of the housing allocated. Only strategic

sites in Ilford South are considered, with the rest unacknowledged. Thus a SA of the implications of placing the quantum of housing proposed in Ilford South has never been properly carried out.

6. SUBSEQUENT CONSULTATIONS

6.1 The 2016 and 2017 SA documents have been developed to justify the preferred option approach. The representations to the 2016 consultation from residents concerned about the quantum of development in Ilford South have again been ignored, alongside an apparent disregard for the resulting effects of high rise developments on the amenities and well-being of residents in adjacent and established residential neighbourhoods.

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