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ID No: R00468

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

**Issue 2**

**Are the spatial vision and objectives for Redbridge (Section 2) sound having regard to the presumption in favour of sustainable development?**

**Issue 3**

**Is the overall spatial development strategy (Policy LP1) sound having regard to the needs and demands of the Borough; the relationship with national policy and Government objectives; the provisions of The London Plan and the evidence base and preparatory processes? Has the Local Plan been positively prepared?**

**Issue 4:**

**Are the Investment and Growth Areas properly defined, do they positively promote the spatial vision and objectives for Redbridge and are the expectations for growth justified and deliverable?**

## **1. THE PLAN IS NOT ADHERING TO THE FOLLOWING POLICIES AND OBJECTIVES**

1.1 The Redbridge Local Plan does not promote sustainable development and therefore contravenes National Planning Practice Framework (NPPF) paragraph 7 particularly in regard to:

- a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being

1.2 It also does not fulfil NPPF para 50 - To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should:

- plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes)
- identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand

1.3 In addition, it does not fulfil London Plan policy 2.6B

- The Mayor will, and boroughs and other stakeholders should, enhance the quality of life in outer London for present and future residents as one of its key contributions to London as a whole.

1.4 It also fails to meet London plan policy 2.7p

- ensuring the availability of an adequate number and appropriate range of homes to help attract and retain employees and enable them to live closer to their place of work in outer London.

1.5 Further, it falls short of Redbridge's own objectives in the Local Plan:

Objective 1: Promoting and Managing Growth

- To improve the health and well-being of Redbridge's population and reduce health inequalities through good spatial planning, supporting healthier lifestyles and environmental improvements, as well as ensuring appropriate access to health facilities
- Ensure diversity in the type, size and tenure of housing, including affordable housing to meet local needs
- Respect and enhance the character of the borough's established residential neighbourhoods

Objective 3: Promoting High Quality Design

- To promote high quality, safe and sustainably designed buildings, places and streets
- To promote and protect the high levels of amenity and quality of life to make Redbridge an attractive, successful and vibrant place for residents, workers and visitors

Objective 4: Protecting and Enhancing Redbridge's Assets

- Improve existing open spaces and manage open space deficiency;

## **2. WHY THE SPATIAL VISION IS NOT SUSTAINABLE**

2.1 The spatial vision as presented by the Council is ostensibly 5

Investment and Growth Areas (IGAs) but this is very disingenuous, as it implies an equitable distribution of housing in the 5 areas. This is far from

what is advocated in the Plan. As it currently stands, The Local Plan is proposing 6,063 units in the wards of Clementswood, Loxford and Valentines and Mayfield, 5,048 units in Goodmayes, Seven Kings and Chadwell Heath, and 573 in Cranbrook and Newbury. This is a total of 11,684 within the Ilford South area and covers the three IGAs of Ilford, the 'Crossrail Corridor' and Gants Hill. The IVG area of South Woodford has 487 units and the IVG area of Barkingside has 1,127. This means that 88% of the housing in the 5 investment and growth areas is in Ilford South. It would have been more accurate, therefore, to state that the spatial vision for Redbridge is to put the housing in Ilford South as the vast majority of the area has become the IGA site of choice. This is simply not sustainable.

2.2 Expectations for the effects of the growth within Ilford South in the Plan are overly optimistic, always focusing on the possible positive effects and avoiding analysis of the negative. There is an over- concentration of housing in the form of high-rise flatted developments, which will put a strain on the already stretched infrastructure and the inadequate new infrastructure proposed will not address the huge needs caused by the developments. The strategy will further deteriorate the quality of life and health and wellbeing of the residents, by causing further decline in green open space, play and informal recreation provision and by increasing congestion. In addition, it will not provide the housing mix required as identified in the Outer North East London Strategic Housing Market Assessment and will lead to families living in overcrowded high rise flats as there will be no other type of affordable housing available.

2.3 The IGA, or as it is sometimes called Opportunity Area (OA), approach has been found, in practice, to have many problems associated with it highlighted by Just Space. Just Space is an informal alliance of community groups, formed in 2006 to act as a voice for Londoners at grass-roots level, which consults with the Greater London Council. Just Space has identified significant problems in using the IGA designation for

spatial planning. There has not, to date, been a comprehensive documentation, review and assessment of the impact of IGAs on London's development against the principles of the London Plan but Community based evidence suggests overwhelmingly negative effects and indicates that in their current form they should be reconsidered. These negative effects are material considerations that should be taken into account in evaluating the spatial vision in the Redbridge Local Plan.

2.4 Just Space state that given the impact of these IGAs on the city, the highest standards of public participation should be expected, including early and full public information and consultation prior to their designation and effective participation early in the planning process. This has certainly not been the case in Ilford South.

2.5 Ilford has also been designated as a Housing Zone. Housing Zones attract Mayor of London funding to accelerate the construction of new homes. Housing Zones were meant to be adaptable to suit circumstances in each individual borough. It is disappointing, therefore, that Redbridge Council chose, within their spatial strategy, to designate Ilford Town Centre as the Housing Zone, where little family or affordable housing can result. They have been content to take 55 million pounds, for 2,189 homes, nearly all of which will be part of high-rise small flatted developments. They have also accepted an affordable housing level in the Housing Zone of only 25%, despite the funding allocation.

2.6 Just Space report that using the IGA approach leads to vulnerabilities which developers can exploit to put pressure on Boroughs to grant consent for planning which should, by all reasonable standards, not be acceptable. It has also become clear that the kind of development being delivered within the IGAs and Housing Zones is having a disproportionately negative impact on poorer communities. They encourage the provision of expensive, high density housing which does

not meet the needs of local communities, especially of families, as family housing tends to be discouraged.

2.7 The current financial and planning models in IGAs also encourages the continuing role of a limited number of favoured Volume Developers who require large cleared sites, entailing clearance of existing housing and businesses and the decanting of communities. High profit expectations and secret viability reports lead to agreements which drive down the delivery of social and affordable housing, and in some cases have led to the suspension of CIL charges. This again has been the case in Ilford South in preceding years. Surely, we need to learn the lessons from the past.

2.8 Just Space report that there is no consistency as to what an IGA is within London. The designations are given from above without informing, let alone ensuring the effective participation of the people who already live and work in the area. The IGAs are deemed to be areas which are capable of accommodating substantial new jobs and or/homes along with the provision of other uses such as retail, leisure and community facilities. The evidence base for this assumption is suspect on many levels within the Redbridge Local Plan.

### **3. EVIDENCE BASE FOR THE DESIGNATION OF IGAs AND THEIR HOUSING CAPACITY**

3.1 It does not seem that population projections for the Redbridge area have been adjusted in the light of Britain leaving the European Union. It seems likely that there will be less population growth as it is known that long term international migration has contributed to over 46% of the Borough's population increase between July 1<sup>st</sup> 2004 and June 30<sup>th</sup> 2014, with the majority increase occurring in Ilford South. This should,

therefore, affect the projections for population growth in the Borough and the targets for housing.

3.2 The evidence base for the level of housing capacity within the individual IGAs lacks robust analyses of many factors. This has particularly been the case in the early stages, when the spatial vision was first formulated. These factors include population densities; how much new housing has already been developed in the specific areas in the preceding years; the numbers of legal and illegal flat conversions, 'beds in sheds' and Houses of Multiple Occupation (HMO) in the area, which, obviously, increases population levels.

3.3 The amount of housing allocated to the Ilford Housing Zone is quoted by the Council as 4,000 units. However, we understand the Housing Zone bid was for 2189 units covering an area of 55ha. This is a huge discrepancy. How the Housing Zone meshes with the IGA and affects the number of units is not clearly explained.

3.4 The evidence base for the assertions that each individual area can accommodate the infrastructure required is very superficial. There have been no properly audited infrastructure needs specific to the Ilford South area. There has not been an adequate taking into account of the effects of the real population increase, if the quantum of housing as proposed takes place.

3.5 Schools in Ilford South are already having to be expanded to cope with the current population, which is leading to the further loss of open space. There is simply not the room for extra buildings on the scale required, leading to any new school in Ilford South being on a smaller 'footprint' of land than desired, with children having less space to move around and little access to outside green and play areas. Open Space levels are already well below acceptable levels in Ilford South, yet further open space will be lost through this Plan. This will add to the health and

well-being inequalities in the borough, which is already very divided in terms of deprivation.

3.6 Public Transport Accessibility Level (PTAL) is used repeatedly to justify high density levels of housing in Ilford South. The use of PTAL on its own is not a useful indicator of housing capacity as, obviously, it needs to be used in conjunction with current and projected levels of transport saturation, particularly at peak times. The true extra capacity that Crossrail will bring to the stations at Chadwell Heath, Goodmayes, Seven Kings and Ilford has not been analyzed in a comprehensive way, yet Crossrail is constantly used as the driver of this housing growth. In addition, there have been no parking stress surveys carried out in Ilford South when it is known that parking is already a huge issue, causing much conflict.

3.7 It is also not clear which jobs are envisaged for Ilford South with this spatial approach. The emphasis on entrepreneurial space appears to indicate that self-employment rather than sources of employment may be the strategy, which may not bear very much fruit and a 'dormitory' culture may well predominate.

3.8 Just Space highlight the issue of the sustainability of large transport investments such as Crossrail, which produce dense, high rise housing around well-connected nodes. They say this creates 'dormitory' neighbourhoods and generates additional travel requirements. In addition, it elevates the costs of housing to unaffordable levels, which has already been the case in Ilford South and which will continue unabated under this spatial strategy. Just Space advocate alternatives which encourage a more mixed-use, live-work environment, which builds on, rather than eradicates the existing qualities and diversity of London's neighbourhoods.

#### **4. OTHER ISSUES WHICH IMPINGE ON THE SPATIAL STRATEGY**

4.1 There are some questions about the spatial strategy that we feel cannot be answered until there is further input from the other issues identified by the Inspector:

**4.2 Issue 3 question (ii) - Will the strategy satisfactorily and sustainably deliver the new development and infrastructure needed over the plan.**

**4.3. And 4 (i) - Will the infrastructure required for the Investment and Growth Areas be delivered in a timely fashion to keep pace with development? How is it to be funded? Does the Infrastructure Delivery Plan (LBR 2.21) provide sufficient certainty? How and when will the infrastructure be triggered?**

4.4 These need input from **issue 12 - 'Does the Local Plan have clear and effective mechanisms for implementation, delivery and monitoring (LP41)'**, with an interrogation of Appendix 2.

4.5 Additional questions we have for issue 12 are:

- Is the phasing of developments with the frontloading of those in Ilford South a reasonable and prudent option?
- Has there been a risk analysis of the strategy and policies to demonstrate robustness and to show how the plan could cope with changing circumstances?
- What may be the effect on the retail function of the town centres caused by multiple building works happening concurrently?

**4.6 Issue 3 (iii) - Does the Local Plan strike the correct balance between residential and employment issues?**

4.7 This needs analysis from **issue 7 – 'Are the policies relating to town centres and employment (Policies LP9, LP10, LP11 and**

**LP14), and the other policies relating to promoting and managing growth in Section 3 justified, consistent with national policy and will they be effective?’**

4.8 Additional questions for issue 7 are:

- How will the increase in population impact on the vitality of Ilford town centre as a retail destination?
- What evidence has been used to elucidate the current numbers of hotels, flat conversions; ‘beds in sheds’ and HMOs within the different areas of Redbridge? What are the current effects of these type of dwellings on different areas and how can any negative effects be ameliorated?
- As there are at least 23 bed and breakfast hotels in and around Ilford Town Centre, with whole streets being used for this purpose, should LP7 state that Ilford Town Centre will not permit any more bed and breakfast hotels in the Plan period and LP6 3 also altered to reflect this?

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