

**Additional Response to issues raised by the Inspector of Redbridge Local Plan****Issue 3****i) Is the Local Plan in conformity with the London Plan?**

The Local plan does not reflect the London Local Plan or current Mayor's concerns so it is therefore not in conformity with it. Indeed the mayor's response says it is not in conformity since it doesn't demonstrate 'exceptional circumstances' to support the proposed release of the green belt. In addition in terms of housing he states: in terms of addressing the London Plan's policy 3.3 the housing proposed is significantly below the boroughs objectively assessed need for 2132 homes per year. On affordable housing (3.11 of London Plan) he states given his strategic target for affordable homes will be working towards 50% so the target for affordable homes should be higher than 30%. Despite his comments the Council has not increased the no of homes proposed and still stuck with 30% target although under the Mayor's affordable SPG this means all schemes will automatically be called in wasting time and money. The Mayor has also introduced a London Affordable rent and a London Living rent. Neither of these are reflected in the Local Plan so overall it is therefore not compliant.

**iv ) Is the location justified given most of the property is in Ilford S**

11,000 homes ie the majority are being built in Ilford S mainly in the form of tower blocks which the Council itself admits in the Plan are unsuitable for families (para 5.4 LP26.27 & 29 ) so these will be mainly 1 and 2 bed flats bringing in professional singles and/or couples who are commuters driven out of central London by high prices. Properties won't be affordable to local people and newcomers will have no loyalty to the area. Besides being contrary to the identified need for family accommodation of 3 beds plus, the location is unsuitable for so many new properties since the area is already densely populated with few facilities and parking, pollution and congestion a real problem. There is no proposal for more health facilities to accompany this massive population growth and I can only conclude that this area is being overdeveloped because it's one of the poorest parts of the borough with fewer middle class voters to object. When there are as few as 800 odd properties proposed for South Woodford locals organised a meeting to object which was attended by the leader of the Council. No consultation meetings were held over this plan which means people are living in ignorance of its implications for their lives.

**Issue 5****ii) Should housing need be assessed on a London wide basis or within the Outer NE housing market area?**

I believe it should be the latter as we need to prioritise and serve the needs of the local population in order to maintain sustainable communities. With this plan locals will be driven further out of London and incomers from central London or overseas buyers will be the only people who can afford the proposed housing developments.

**iii) Is the minimum housing target of 16,845 justified having regard to the aim in The London Plan to “close the gap” to objectively assessed need and the expectation in Table 3 (as modified) (LBR 1.01.3) that 18,936 dwellings will be delivered during the plan period?**

This target is unjustified as much too low as it doesn't nearly go anywhere near 'closing the gap' when the identified need is for nearly double the no of homes i.e. 31,997 identified in the outer NE strategic housing market plan. The 54,768 Million provided by the GLA could be used to build many more homes if it were used to build ready assembled green homes on council land instead of the Council using this land for its own housing company to build non affordable homes to make a profit and not provide for local people whom the council has a duty towards (see Newham Recorder article April 14<sup>th</sup> 2016). This is a waste of council resources since these people have to be housed elsewhere at great cost .

**xii What is the rationale for the minimum strategic affordable housing target of 30%? Does this respond adequately to the objectively assessed need for affordable housing, the Viability Assessment (LBR 2.11), The London Plan and the aspirations of the Mayor of London?**

It is clear that the 30% target is totally inadequate and doesn't respond to the objectively assessed need for affordable housing or the mayor's expectations as outlined in the Mayor's affordable housing SPG for a minimum of 35% genuinely affordable housing. I believe the rationale is based on ensuring developers getting a decent profit margin for each scheme. The Viability Assessment used doesn't reflect best practice being developed by the GLA's viability unit or boroughs like Islington who have a robust viability assessment.

Even this 30% target is worthless since the Local Plan says different levels can be negotiated on a site by site basis. As mentioned in response to Issue 3 it makes no mention of the new London affordable rent or London Living rent based on a third of local incomes which would make housing genuinely affordable to the 2 K plus homeless people the Council has in temporary accommodation.

**Xvi) Does the Local Plan adequately address the needs for all types of housing (excluding affordable housing) and the needs of different groups in the community as set out in paragraph 159 of the National Planning Policy Framework?**

The Plan doesn't address the need for supported housing for vulnerable groups like people with mental health issues, BME elders or LGBT people or DV victims. There are now 60 rough sleepers locally which is the 8<sup>th</sup> highest no in the country and there is only one small hostel for them which is silted up. Many have drug and alcohol issues yet there is no provision. They are regularly turned away being told the Council has no duty towards them .There is no provision for 'move on' from supported housing even though the Mayor has set aside funding for this and supported housing . There are lots of creative models for cheap single person homes ( YMCA's one click ) which could be delivered. There had been a plan to build a village for older people where they could progress from low to higher care but this was abandoned and given the increase of people with dementia this is a real . Self builders are also neglected as are low cost family housing solutions .