

Meenakshi Sharma (on behalf of NOISE)
Neighbourhoods of Ilford South Engage
ID No: R00468

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

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?

1. The information in the various appendices for Site 2 'The Exchange Shopping Centre' has been extremely misleading. Site 2 has an increase in site area from 1.34 to 2.5ha after submission of the Plan. The housing units are reduced from 388 to 214 with the reason given as 'factual update of indicative development capacity in line with planning application'. If this is the case, the site size should reduce to 0.5ha which is the site size of the development not 2.5ha. The whole of the Exchange site has now become an opportunity site, not just one part of it.

2. The proposed uses for the Exchange have been changed after submission from employment, retail and housing to: employment, housing, retail, leisure including restaurant, beverage and cafe uses and hotel. No reason is given for this modification in the appendix but in the schedule of modifications it is shown to be responding to Matthew Sobic of Savills. He states that: 'In order to respond to changing customer habits and digital technology and provide a wider offer and increase attraction, it is proposed that the proposed uses on the site are widened to include leisure, restaurants and hotels'.

3. The Councillor and Council Officer who have been given delegated powers to decide on modifications have deemed this to be appropriate. With such huge changes being proposed in the Ilford Town Centre and with many retail establishments being part of the opportunity sites, this decision has been taken without any thought of the whole context of the Town Centre, and with a complete disregard for the people who live and shop in the area.

4. The whole issue of what the Town Centre is for is in question here. The people who live here need to be involved. The Council is making deals with the developers and bypassing the residents they purport to represent. This has been done in a most underhand way, through representation at very late stages in the Plan making process. For the Council to have accepted these modifications at this stage is shocking and disappointing in equal measure.

5. Savills are now wishing to make further amendments and we question whether that is procedurally proper. They wish to further specify the uses of the Exchange to cinema, bowling, trampoline park, children's activity centre and similar leisure uses compatible with a town centre location.

6. With the third floor of the Exchange being completely occupied by a gym, with these other uses, the retail function will be reduced to a fraction of its current level, which has already depreciated in recent years. The Exchange is inextricably linked with the surrounding retail, commercial and leisure units of the Town Centre. There will be knock on effects on the whole area. There is currently a cinema in the town centre. Bowling establishments are also located in the centre but are currently not in use. Savills statement refers to market demand for its proposals. Where is the evidence for this?

7. There is currently a huge overconcentration of hotels within Ilford South and particularly within and near Ilford Town Centre. Numbers of establishments and numbers of rooms available and occupied is a simple

and easy way to establish the extent of this issue. We believe there are at least 45 establishments acting as hotels in Ilford South, many of them near Ilford Town Centre. The use of the Exchange as a hotel, in these circumstances, has no rationality to it, when actually hotels need to be closed down in the area rather than opened up.

8. With proposals to demolish the Kenneth Moore Theatre and not replace it also in the Plan, there are huge questions about the whole nature of the Town Centre. Floorspace for Community infrastructure and what that community infrastructure should be is something the Council should consult on as a stand alone consultation. There needs to be in the policies an acknowledgement that community facilities may not be being used because the Council has not promoted or supported them. Lack of use should not, by itself, be reason to remove and not replace the facility.

9. By consulting on a multitude of issues at the same time, the Council overwhelms residents ability to understand the key, important points. The change in uses at the Exchange should not go through on modification in the Plan, but should be part of a consultation on the whole Town Centre Area. Questions about what residents really want from their Town Centre need to be at the heart of it.

10. The dwelling mix set out in Table 4 is not justified given the recognised need for more family housing. The locating of much of the housing in areas which cannot support family housing makes the Plan Unsound. There is no quantitative analysis of what the dwelling mix will likely to be using this Plan.

11. There are no policies for Waste within the Local Plan and there need to be. Ilford Town Centre in particular suffers from rubbish bags which are dumped, and the overflow of bins because there has been no adequate assessment of the waste disposable needs with increased housing and hotel development.