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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 8: Are the policies relating to promoting sustainable transport and cycle and car parking (Policies LP22 & LP23) and the other policies relating to promoting a green environment in Section 4 justified, consistent with national policy and will they be effective?

1. The Local Plan is promoting policies which disregard the reality of people's lives on the ground. For instance, the Council has allowed a proliferation of developments in the last 5 years next to Westside Apartments, with scant parking provision, which is making the situation for residents progressively worse. This situation needs to be dealt with, not by saying residents shouldn't have cars but by the provision of adequate parking. This situation is simply not sustainable, healthy or safe, as outlined in the statement on tall buildings. The parking situation in the location has got even worse recently due to the development at the Britannia Music site which has reduced the road width for its Works Access.

2. There are cars parked on both sides of the road leading up to the flats. This is because residents have no choice. Particularly families with children and those with disabilities as there are simply insufficient places in the vicinity. The Plan encourages residents to use sustainable modes of transport, like walking, cycling and hiring cars. This is simply not

possible for everyone's circumstances or for every trip and where are the working services to provide cars easily for hire? How can families be expected to hire a car for every trip? Taking their car seat down each time from their flat, along with their children. This is simply not workable.

3. The lack of parking space has led to delivery vans parking in the middle of the road leading up to the flats, as they simply have nowhere else to park. Cars are thus stuck for long periods at a time unable to get in or out of the lower part of Roden Street. There is an office at the end of Roden Street, which has a constant movement of vehicles in and out, which also get stuck.

4. The policy of not providing parking in sites with high PTAL is short sighted and ignores the reality on the ground. Cars have got more affordable and homes less. Unless there is a legal requirement which prevents car ownership for people in flats, the current severe car parking problems in Ilford South will be severely exacerbated.

5. 6.48 of the Mayor's Parking Standards Minor Alterations to the London Plan March 2016 states that operational parking for maintenance, servicing and deliveries is required to enable a development to function. Some operational parking is likely to be required on site and should be included in the calculation of total parking supply. This is simply being ignored.

6. It further states that all developments in areas of good public transport accessibility should aim for significantly less than 1 space per unit. However, with the reality on the ground, the Plan has to recognise that significantly less has to take account of the local circumstances otherwise there will be chaos and conflict.

7. It further states that adequate parking spaces for disabled people must be provided preferably on-site and this is not being achieved.

Table 5-12 in LBR 2.50 Net Increase in Traffic Flow (Vehicle) by Junction and Link shows that if the proposals in the Plan are implemented, every single increase in traffic flow will be in Ilford South, whereas many area in the rest of the borough will experience an actual decrease in traffic flow.

8. Junctions and links within Ilford are indicated to experience high levels of traffic growth. LBR 2.50 then states: 'From this, LBR may wish to consider further assessment of the various junctions and links to assess how much spare capacity they currently have and whether mitigation measures and improvements to infrastructure are required. In the first instance, an assessment of the impact could be undertaken to understand the likely significance of the effect. This will determine whether the existing infrastructure can accommodate the additional forecast demand. Should a significant effect be identified, for example in the form of additional delay or queuing, it may be appropriate for mitigation measures to be considered.'

9. Table 5-14 presents the bus stops forecast to experience the highest additional demand. As expected, the locations experiencing the most demand are those with origins in Ilford. Table 5-15 presents the rail / underground stations in order of those forecast to experience the highest demand. The stations in Ilford South of Ilford, Seven Kings, Goodmayes Chadwell Heath and Newbury Park are expected to experience the highest levels of increased demand. As with the additional traffic demand, the consultants advise, in the first instance, an assessment of the impact of additional public transport demand in this case could be undertaken to understand the likely significance of the effect. This will determine whether the existing services and infrastructure (for example, a bus service) can accommodate the additional forecast demand. Should a significant effect be identified, for example in the form of excess demand for a service, it may be appropriate for mitigation measures to be considered.

10. Appendix J shows the huge increase in demand for both bus and rail services. Yet there is no baseline evidence to show current usage, when it has been reported repeatedly in the local press how overburdened Ilford station is, with people having to queue outside the station due to system overload and the overcrowding at bus stops.

11. All of this is extremely worrying. This shows that the Plan has not assessed the current capacity of the network to know what improvements to infrastructure will be required. The transport evidence was produced in March 2017, well after the Plan had been submitted. It is incomprehensible that crucial evidence that should have been used to inform the Plan is simply gathered for no apparent use. On this basis, The Plan cannot be considered to be Sound in any capacity.

12. In addition, the figures the Council quote for the extra capacity Crossrail will bring are erroneous. We calculate a 20% extra capacity per train as evidenced by the current numbers on trains, not 70% as they claim. In addition, they have not factored in two crucial elements: current undercapacity on the line; developments being constructed at stations along the Crossrail line at Shenfield, Brentwood, Harold Wood, Gidea Park, Romford and then within Redbridge itself Chadwell Heath, Goodmayes, Seven Kings before reaching Ilford which will have the greatest extra demand. This is simply not sustainable.