

Ms Meenakshi Sharma comments

Page: [Foreword](#)

Section: [N/A](#)

p xiv para 'Some of the very richest and poorest people in the country live in London, with life expectancy differing by up to 19 years between boroughs.

It is very important to note that this inequality is also within boroughs and some boroughs in particular have a very marked difference between wards, with some neighbourhoods in the top 20% of affluence and some in the 20% of most deprived.

This Plan will, we fear, exacerbate these inequalities by the spatial strategies it advocates.

Page: [Policy GG2 Making the best use of land](#)

Section: [N/A](#)

Policy GG2 A, B, D

This spatial strategy of Opportunity Areas is oppressive to the poorer residents of London and affects the ethnic minority population to a greater degree as they are proportionately poorer than the indigenous population.

The 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 OA designation for spatial planning. There has not, to date, been a comprehensive documentation, review and assessment of the impact of OAs 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.

Just Space state that given the impact of these OAs 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 OA.

Just Space report that using the OA 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 OAs 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.

The current financial and planning models in OAs 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.

Just Space report that there is no consistency as to what an OA 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 OAs 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 certainly within the Redbridge Local Plan.

The evidence base for the level of housing capacity within the individual OAs 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.

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.

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.

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.

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.

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.

Thus, this policy is already being instigated in the London Borough of Redbridge with devastating consequences for the residents of Ilford South. The concentration on high density developments is leading to small 1-2 bed high rise flats with little amenity space and which are totally unaffordable for the local population. If that is what you want for London then please be open about it. It is not what the majority of residents, especially those with families, who are struggling to find accommodation want.

The green areas, including Green Belt need to be considered on a site by site basis just like brownfield sites should. Brownfield cannot simply mean anywhere that has been built on, as what is happening in Redbridge is that anything and everything is up for grabs for the developers. Density is an issue and density guidelines should not be taken away and in fact should be greatly strengthened. There needs to be safeguards because it appears brownfield sites only seem to exist in the poorer areas, as the planning system is inherently biased in favour of the more affluent. Conservation area designation and the fact the more affluent have the social capital and skills to navigate the Planning system to stop planning applications, leaves the poor and vulnerable open for exploitation.

Page: [Policy SD1 Opportunity Areas](#)

Section: [N/A](#)

5)

How will you ensure the OAs maximise the delivery of affordable housing. Just look at what is happening currently with Ilford OA. A Sainsbury development of 700 flats offered 4% affordable housing which the Council accepted. Review mechanisms don't work - they are a game developers play. Look at what has happened and learn from the past.

6) OAs are themselves the creators of spatial inequalities so how can they possibly reduce inequalities. This is an oxymoron.

10) What are these new jobs? Are these the construction jobs that are mostly filled by migrant workers? This needs to be clarified.

This spatial strategy is how the oppression of the poorer and residents of London is being instigated. This affects the ethnic minority population of London to a greater degree as they are proportionately poorer than the indigenous population. This is exemplified in the case of Ilford. Crossrail is being used as an excuse to dump all the housing that other areas in the borough do not want without any due regard for population density, context, character, levels of infrastructure. There has been no modelling to show how much capacity on the rail network there will be, given there is no new line, only the trains will be different. Current marked undercapacity and the developments on the line from Shenfield onwards which will impact on passenger demand have not been considered. This, we are sure, will lead to a crisis in the ability of the Crossrail line to cope with the increasing population.

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Page: [Policy SD6 Town centres](#)

Section: [N/A](#)

G

In Ilford South we have a huge number of hotels and b&bs in the area. This should not be clustered in this way, leading to a huge reduction in the amount of residential property available. Policies to keep numbers to a reasonable level and to ensure they are distributed around the borough are essential so that the poorer wards are not used as a dumping ground for these establishments.

Page: [Policy SD8 Town centres: development principles and Development Plan Documents](#)

Section: [N/A](#)

Object -

B5a)

There should be parity within the borough to ensure that the supermarket/retail/leisure sites are not just focused on one area, as this will inevitably be the poorer areas. Density needs to be the same whether the development is in a congested poor ward or in a leafy, affluent one. If density is to be different, the poor ward should have lower density due to its congested nature. The height of buildings should also be the same in both areas or less high in the more congested areas.

C3)

Support is an inadequate word and open to interpretation. **There must be** efficient delivery and servicing in town centres is more appropriate, otherwise what is happening currently with so many problems with servicing and delivery will continue.

C4)

A range of unit sizes is also open to interpretation. Sizes and a range of how many units, depending on the size of the development should be stipulated.

Page: [Policy D4 Housing quality and standards](#)

Section: [N/A](#)

3.4.2

The space standards are minimums which applicants are encouraged to exceed. However, due to the level of housing need and the requirement to make the best use of land, boroughs are encouraged to resist dwellings with floor areas significantly above those set out in Table 3.1 as they do not constitute an **efficient use of land**. The standards apply to all new self-contained dwellings of any tenure. The provision of additional services and spaces as part of a housing development, such as building management and communal amenity space, is not a justification for failing to deliver these minimum standards.

This is a contradictory statement. It is basically saying that these dwellings should be as small as possible within the standards so why say applicants are encouraged to exceed. It does not make sense.

D6 A

Development proposals must make the most efficient use of land and be developed at the optimum density. The optimum density of a development should result from a design-led approach to determine the capacity of the site. Particular consideration should be given to:

1. the site context
2. its connectivity and accessibility by walking and cycling, and existing and planned public transport (including PTAL)
3. the capacity of surrounding infrastructure

PTAL on its own is not a good indicator of the optimum density. Current saturation levels on the transport network need to be considered. What constitutes a safe cycling network that local people would be happy to use needs to be clearly defined. Population density in the area should be a factor to be considered.

B

1. The density of development proposals should be based on, and linked to, the provision of future planned levels of infrastructure rather than existing levels.

These need to be costed and have dates of implementation. The infrastructure should come before the development is constructed.

Definition

1. Based on local context, Development Plans should define what is considered a tall building, the height of which may vary in different parts of London.

Tall building locations

1. Tall buildings should be part of a plan-led approach to changing or developing an area. Boroughs should identify on maps in Development Plans the locations where tall buildings will be an appropriate form of development in principle, and should indicate the general building heights that would be appropriate, taking account of:
 1. the visual, functional, environmental and cumulative impacts of tall buildings (set out in part C below)
 2. their potential contribution to new homes, economic growth and regeneration
 3. the public transport connectivity of different locations.

This is open to discrimination, where tall buildings are placed in poorer wards. There needs to be some parity throughout a borough. Residents generally do not want tall buildings, thus if they are to be constructed in town centres, retail parks etc; they need to be in all the town centres and all the retail parks not just those in the poorer wards.

Page: [Policy H1 Increasing housing supply](#)

Section: [N/A](#)

1. Table 4.1 sets the ten-year targets for net housing completions which each local planning authority should plan for. Boroughs must include these targets in their Development Plan documents.

Redbridge is in the last stages of its Local Plan (2015-2030). It has allocated 15,000 of its 17,230 units to wards in Ilford South. This is exacerbating a crisis of infrastructure in the Ilford South area. The more affluent areas of the Borough were listened to and had their allocations reduced. Pressure from the GLA target numbers along with a refusal to consider Green Belt release in a Borough which is a third Green Belt is leading to the well-being and quality of life of people in Ilford South being degraded. This is not the professed aim of this London Plan but that is what the outcome will be. This is both a class and a race issue.

What does a ten year housing target mean of 19,790. How much more in addition to the 17,230 does the Borough have to create? Where will this be given the constraints of the more affluent areas and the Green Belt. Will Ilford South simply have to absorb more. This London Plan, without safeguards for the poorer areas, is iniquitous and should be reconsidered.

Page: [Policy H2 Small sites](#)

Section: [N/A](#)

To deliver the small sites targets in Table 4.2, boroughs should apply a presumption in favour of the following types of small housing development which provide between one and 25 homes:

1. infill development on vacant or underused sites

2. proposals to increase the density of existing residential homes within PTALs 3-6 or within 800m of a Tube station, rail station or town centre boundary through:
 1. residential conversions
 2. residential extensions
 3. the demolition and redevelopment of existing buildings
 4. infill development within the curtilage of a house
3. the redevelopment or upward extension of flats and non-residential buildings to provide additional housing.

We have this going on apace in Ilford South currently. Family dwellings are being converted to smaller and smaller units. Rear garden outbuildings are being used as dwellings, with consequent degreening of gardens. This policy pays no heed to infrastructure requirements of the increased population, waste management, car parking. What these unregulated developments have hitherto created are slums with poor quality housing which poor overcrowded households occupy. Is this the aim of the London Plan? Strong safeguards, such as those given to conservation areas need to be in place not this presumption in favour of development. This is an example of the discrimination in the planning system.

4.2.7 Special attention will be required within **conservation areas** to ensure that increased housing provision is accommodated in a way that also complements and enhances an area, taking into account conservation area character appraisals and management plans.

Page: [Policy H4 Meanwhile use](#)

Section: [N/A](#)

H4

1. Boroughs are encouraged to identify opportunities for the meanwhile use of sites for housing to make efficient use of land while it is awaiting longer-term development.

Meanwhile uses will lead to areas that have been identified for housing in the Local Plan, such as Ilford South, where 15,000 of 17,230 units have been allocated, becoming a place for temporary housing, particularly in our town centres. The effects of the increased population and infrastructure requirements will be ignored. The other areas of the Borough will remain untouched. We will not have any town centres of any substance.

Page: [Policy H5 Delivering affordable housing](#)

Section: [N/A](#)

H5

The strategic target is for 50 per cent of all new homes delivered across London to be affordable. Specific measures to achieve this aim include:

4.5.5 Affordable housing should be delivered on site to help deliver mixed and inclusive communities. Affordable housing should only be accepted as an **off-site** contribution in exceptional circumstances where it can be robustly demonstrated that affordable housing cannot be delivered on-site or where an off-site contribution would better deliver mixed and inclusive communities than an on-site contribution.

4.5.9 To avoid incentivising off-site provision or in lieu contributions, agreements for this should provide no financial benefit to the applicant relative to on-site provision and should include **review mechanisms** in line with the Viability Tested Route. The policy target for schemes delivering off-site affordable housing or in lieu contributions is 50 per cent affordable housing provided across the main site and any linked sites when considered as a whole.

These strategic targets mean nothing if the viability assessment 'get out' clause remains. We have not achieved any meaningful housing during the last London Plan and this London Plan has no 'teeth' to change the situation. Viability needs to be challenged at the outset. If a development is not 50% affordable viable - don't do it. It does more harm than good. Where is the GLA analysis of what has happened in the last 10 years borough by borough? Where has the money in lieu gone? We have found in Redbridge, off-site contributions are a deal stitched up by the developers and the Councils, with little benefit for the residents. These sort of developments with money in lieu should not be allowed. We want affordable housing not money for basic services the government should be funding.

We have experience of the review mechanisms, which are a toothless irrelevance. A Sainsbury development for 700 flats with 4% affordable housing was agreed by Redbridge Council with a review mechanism. Even the consultant for Sainsbury at the appeal enquiry admitted, it was highly unlikely that any further affordable housing would be forthcoming, given the low profit they were making and that their 20% profit margin would have to be met before any other commitment could be considered.

Page: [Policy H6 Threshold approach to applications](#)

Section: [N/A](#)

E 1)

Where an application does not meet the requirements set out in part C it must follow the **Viability Tested Route**. This requires detailed supporting viability evidence to be submitted in a standardised and accessible format as part of the application:

1. the borough, and where relevant the Mayor, should scrutinise the viability information to ascertain the maximum level of affordable housing using the methodology and assumptions set out in this Plan and the Affordable Housing and Viability SPG

Viability assessments are the weak link in the chain. If a development cannot give the required affordable contribution, don't allow it to go ahead. Learn from the last 10 years. Stop the developers holding us to ransom.

Page: [Policy H6 Threshold approach to applications](#)

Section: [4.6.13](#)

4.6.2

The **Viability Tested Route** will assess the maximum level of affordable housing that a scheme can deliver in cases where the threshold level of affordable housing cannot be met and where fixed or minimum affordable housing requirements are not in place. It is possible that, via the viability assessment using the detailed methodology in the SPG, a greater affordable housing contribution than the threshold level will be found to be viable and thus will be required.

What is the detailed methodology in the SPG. Will it differ from the national planning guidance. Which will have precedence? There is a whole industry which has been created to prove the case for the developers that a project is not viable. The national planning policies support this. How will you deal with this?

Page: [Policy H6 Threshold approach to applications](#)

Section: [4.6.13](#)

4.6.13

In Opportunity Areas, boroughs may want to consider applying a **localised affordable housing threshold** for the Fast Track Route or fixed affordable housing requirements. This approach could help provide certainty to developers and land owners and help prevent land price rises based on hope value. Localised affordable housing thresholds, or fixed affordable housing requirements should increase the affordable housing provision beyond 35 per cent where possible. Boroughs may also consider a local approach in terms of tenure mix. The London Plan threshold approach will apply in Opportunity Areas where a local approach has not been progressed.

This should state clearly that the threshold will be above 35%. If these are the areas where most of the housing will be, surely you should state it should be 50% or there is no chance at all of achieving the 50% target overall. Tenure mix should state clearly that it should be reflective of local needs. Because most of the units in Redbridge are 1-2 bed flats and the need is for 3 beds, there is no way that an appropriate tenure mix will be achieved, so isn't this 'lip service'.

Page: [Policy H7 Affordable housing tenure](#)

Section: [4.7.2](#)

4.7.2

There is a presumption that the **40 per cent to be decided by the borough** will focus on Social Rent/ London Affordable Rent given the level of need for this type of tenure across London. However, it is recognised that for some boroughs a broader mix of affordable housing tenures will be more appropriate either because of viability constraints or because they would deliver a more mixed and inclusive community. The appropriate tenure split should be determined through the Development Plan process or through supplementary guidance.

This is much too low. The other types of tenure such as shared ownership and 'help to buy' have been prioritized in the past. They help people who already have the ability to save for a deposit. There is a huge need for the lower income people who are being evicted at an alarming rate because of the unaffordable rents. I would suggest 80 per cent affordable rent, if not 100%. If this cannot be achieved, then a totally different model is needed ie council housing funded by the state for the people.

4.7.4

London Affordable Rent is rent for households on low income with the rent level based on social rent levels. The NPPF defines affordable rent as up to 80 per cent of market rent, however, to ensure rents in London are genuinely affordable, the Mayor expects rents charged for homes let for London Affordable Rent to be set at benchmarks substantially below this level, based on traditional social rents. More detail is contained within the Mayor's Homes for Londoners Affordable Homes Programme 2016-21 funding guidance. These homes will be allocated in accordance with need (based on the borough's allocations policy).

Where is the Equalities Impact Assessment that should have informed this Plan? Many people in dire need cannot get onto the housing list. This means they cannot access these products. What is to be done for them?

If practically all the new units are 1-2 bed flats and the greatest need is for 3-bed, how will this help the people actually on the list?

'Expects' is not a good word to use. It should be 'demands the same level as traditional social rents'. These 'get out' clauses are peppered throughout this Plan.

A

To determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, applicants and decision-makers should have regard to:

A 6)

the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in more central or urban locations

If everything is situated in the areas where 1-2 bed units are appropriate then how can an appropriate mix of unit sizes be achieved. The spatial strategy mitigates against this. It is disingenuous to think this is meeting the need in London.

C

1. Boroughs should not set prescriptive dwelling size mix requirements (in terms of number of bedrooms) for market and intermediate homes.

Why not? Such a huge proportion will still be in these tenures. Should they not also meet the need for the local population or is it taken 'as read' that these are for buy to let investors?

Page: [Policy H12 Housing size mix](#)

Section: [4.12.7](#)

4.12.7

Houses in multiple occupation (HMOs) are an important part of London's housing offer, reducing pressure on other elements of the housing stock. Their quality can, however, give rise to concern. Where they are of a reasonable standard they should generally be protected and the net effects of any loss should be reflected in Annual Monitoring Reports. In considering proposals which might constrain this provision, including Article 4 Directions affecting changes between Use Classes C3 and C4, boroughs should take into account the strategic as well as local importance of HMOs.

This is a very opaque comment. What does it mean? Most HMOs, at least in Redbridge, are in the poorer wards. Is that what you mean by strategic? Whose strategy does it serve? If this is to stop Article 4 directions in areas with high numbers of HMOs, this is an example of the discrimination within the planning system. The policy should clearly state a limit to the numbers within any ward of this type of tenure.

Page: [Policy H13 Build to Rent](#)

Section: [H13](#)

1. For Build to Rent schemes to follow the Fast Track Route they must deliver at least 35 per cent affordable housing, of which at least 30 per cent should be at London Living Rent Level, with the remainder being at a range of discounts below market rent to be agreed with the borough and/or the Mayor where relevant. Schemes must also meet all other requirements of part C of Policy H6 Threshold approach to applications. This threshold and affordable housing tenure split, will be reviewed and if necessary updated in 2021, through Supplementary Planning Guidance.

Why isn't this set for the whole of London? Is it to protect the more affluent boroughs from less affluent people? It is said that each borough is planning for the whole of London, then surely we need a London-wide stipulation on these discounts.

Page: [Policy H13 Build to Rent](#)

Section: [4.13.4](#)

4.13.4

The Mayor's strong preference is for DMR homes to be let at **London Living Rent** level, to ensure city-wide consistency in approach.

'Strong preference' should be changed to 'Mayor insists that DMR homes....

Page: [Policy H13 Build to Rent](#)

Section: [4.13.6](#)

4.13.6

To follow the **Fast Track Route** at least 30 per cent of the affordable housing must be let at London Living Rent levels. The remainder should be provided at a range of discounts below market rent based on local need to be agreed with the borough and Mayor where relevant, for example with half of remaining units at 50 per cent and half at 70 per cent of market rents.

This is so complicated. It gives the developers and councils lots of ways to reduce the amount of real affordable housing. This should be a lot simpler so ordinary people can challenge it if their councils don't.

Page: [Policy H14 Supported and specialised accommodation](#)

Section: [H14](#)

A The delivery, retention and refurbishment of supported and specialised housing which meets an identified need should be supported.

This needs safeguards. Wording needs to be included to ensure each type of specialized housing is distributed throughout the borough, rich wards and poor wards alike. This will truly make mixed communities and will not strain the services of the poor wards and create conditions where people in the richer wards are unaware that society has any problems.

Page: [Policy H14 Supported and specialised accommodation](#)

Section: [4.14.1](#)

4.14.1

Boroughs should undertake **assessments of the short and long-term needs for supported and specialised accommodation** within their borough. Existing accommodation options available within boroughs should be audited identifying any shortages in capacity or potential extra capacity within schemes, as well as accommodation in need of refurbishment. Boroughs should then use this information to plan to meet identified need, working with relevant authorities, such as children's and adult services, the NHS and relevant charities. For some groups, need may be best met on a multi-borough or pan-London basis.

This has been misused by the richer boroughs sending their residents to the poorer boroughs who in turn situate these types of accommodation within their poorer wards. Such types of accommodation should be situated in each borough, even the richer ones and in the richer wards as well. This creates inclusive mixed communities not this hiving off of people who have additional needs.

The boroughs should also have to meet their homeless residents' needs within the borough and not sent them out of borough. This has created a domino effect with the richer London boroughs sending their homeless people to the poorer ones who then send their homeless people outside of their borough taking up valuable housing from the local people. It is a very iniquitous and counter-productive system and should be stopped.

Page: [Policy H18 Large-scale purpose-built shared living](#)

Section: [4.18.2](#)

Large scale purpose built shared living.

4.18.2 Development proposals for such schemes should only be supported where they meet an **identified market need**.

How is this need going to be identified? Is it pan London or specific to the borough? Safeguards are needed that all parts of the borough will have such accomodation not just the poorer areas.

Page: [Policy H18 Large-scale purpose-built shared living](#)

Section: [4.18.6](#)

4.18.6

The **private units** should be appropriately sized to be comfortable and functional for a tenant's needs and may include facilities such as en-suite bathrooms and kitchenettes. There are currently no minimum space standards for these units. Given the generally small size of the private space in these developments, the communal amenity spaces are important elements in ensuring the quality of the overall residential amenity is acceptable. If deemed necessary, the Mayor will produce planning guidance, including space standards, for this form of accommodation.

The planning guidance is absolutely crucial. Is the Mayor not aware of the overcrowding that is going on in the poorer parts of London and the advantage developers big and small are taking of the inflated prices to justify unhealthy small living spaces?

Page: [Policy E3 Affordable workspace](#)

Section: [E3](#)

A In defined circumstances, planning obligations may be used to secure affordable workspace at rents maintained below the market rate for that space for a specific social, cultural or economic development purpose. Such circumstances include workspace that is:

1. dedicated for specific sectors that have social value such as charities or social enterprises
2. dedicated for specific sectors that have cultural value such as artists' studios and designer-maker spaces
3. dedicated for disadvantaged groups starting up in any sector

Please define what you mean by disadvantaged groups

E9 C

1. Development proposals containing A5 hot food takeaway uses should not be permitted where these are within 400 metres walking distance of an existing or proposed primary or secondary school. Boroughs that wish to set a locally-determined boundary from schools must ensure this is sufficiently justified. Boroughs should also consider whether it is appropriate to manage an over-concentration of A5 hot food takeaway uses within Local, District and other town centres through the use of locally-defined thresholds in Development Plans.

What about areas which already have lots of A5 within 400m of a school. Where is the policy to state that they need to be moved away? The problem has already become established. What is the Mayor going to do? The obesity problems of children in these areas, mostly the poorest, is acute. An upper limit in the London Plan should be specified and not left to councils to argue with Local Plan Inspectors about. The Inspectors, as was the case with Redbridge, may actually want an increase in the number from the previous Plan!

E

1. Large-scale commercial development proposals (containing over 2,500 sqm gross A Class floorspace) should support the provision of small shops and other commercial units (including affordable units where there is evidence of local need).

The floorspace for the small shops should be specified as often the units available are too big. What is the evidence required to show local need? Is there is not other business of the type in the area?

Page: [Policy E10 Visitor Infrastructure](#)

Section: [E10](#)

F

1. The role of apart-hotels and short-term lettings should be supported whilst ensuring that they do not compromise housing provision (see Policy H11 Ensuring the best use of stock).

This does not make sense. Of course they will compromise housing provision. It is obvious if something is used for one purpose it cannot be used for another.

Page: [Policy E10 Visitor Infrastructure](#)

Section: [6.10.3](#)

6.10.3

Boroughs in the CAZ are encouraged to direct strategically-significant serviced accommodation (defined as more than 20,000 sqm in the CAZ) towards the CAZ Opportunity Areas with smaller-scale provision in other commercial core areas of the CAZ. Concentrations of serviced accommodation within parts of the CAZ that might constrain other important strategic activities and land uses (for example offices and other commercial, cultural and leisure uses) or erode the mixed-use character of an area should be avoided. **Boroughs in outer and inner London beyond the CAZ** are encouraged to plan proactively for new serviced accommodation in town centres to help spread the benefits of tourism to the whole of the capital.

We need this to be specified for each Borough, so that certain boroughs, whose councils want the money rather than caring about providing housing for their population do not prioritize this type of accommodation.

B

1. Development proposals should seek to support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases, including through Section 106 obligations where appropriate. Boroughs should ensure these are implemented in ways that (a) enable trainees to complete their training and apprenticeships, (b) ensure the greatest level of take-up possible by Londoners of the training, apprenticeship and employment opportunities created and (c) increase the proportion of under-represented groups within the construction industry workforce. In partnership with the Mayor, boroughs are encouraged to consider cross-borough working to open up opportunities, including those created via Section 106 obligations, on a reciprocal basis, to residents from adjacent boroughs and across London.

To actually do something concrete about inequality within London, these apprenticeships, should be focused on the young people of the OA particularly if they are in the poorer wards. The Mayor should include a policy that there needs to be a joined up effort to do this with the schools in the area and the developers. He should take an audit of how many apprenticeships have been taken up by local people in the last 10 years and how many in the poorer wards.

7.7.6

When **assessing whether a pub has heritage, cultural, economic or social value**, boroughs should take into consideration a broad range of characteristics, including whether the pub:

1. is in a Conservation Area

Given all the other criteria, why should this make a difference? This is discrimination between richer and poorer areas.

Page: [Policy G2 London's Green Belt](#)

Section: [G2](#)

A

1. The Green Belt should be protected from inappropriate development:
 1. development proposals that would harm the Green Belt should be refused
 2. the enhancement of the Green Belt to provide appropriate multi-functional uses for Londoners should be supported.

B

1. The extension of the Green Belt will be supported, where appropriate. Its de-designation will not.

This is an extremely short-sighted approach which panders to the affluent who live near the Green Belt and have no empathy for those who are living in the highly dense, congested, under-resourced and unhealthy environments that this spatial strategy is creating. There has been no proper debate on this issue with the ordinary Londoner. It has been hijacked by the elite to protect their interests. This is totally ideologically driven.

It the Green Belt is not to be used, then the richer wards need to take their fair share of the housing and not just put it all in the poorer areas. This is creating an unsustainable environment, where people cannot afford the huge uplift in prices in the poorer areas, leading to overcrowding, poor standards, debt and homelessness.

Page: [Policy G2 London's Green Belt](#)

Section: [8.2.2](#)

8.2.2

Openness and permanence are essential characteristics of the Green Belt, but despite being open in character, some parts of the Green Belt do not provide significant benefits to Londoners as they have become derelict and unsightly. This is not, however, an acceptable reason to allow development to take place. These derelict sites may be making positive contributions to biodiversity, flood prevention, and reducing the urban heat island effect. The Mayor will work with boroughs and other strategic partners to **enhance access** to the Green Belt and to **improve the quality** of these areas in ways that are appropriate within the Green Belt.

These are ridiculous statements and are made as if there is no housing crisis in London. We do not have the luxury of these statements, which are made by people who are not having to face the crisis on a daily basis.

Page: [Policy G4 Local green and open space](#)

Section: [G4](#)

B

1. The creation of new areas of publicly-accessible green and open space should be supported, especially in areas of deficiency in access to public open space

These are fine words but where is the money for it? Redbridge Council, at least, much prefers the money to be gained from tower blocks than from using the land to create green and open space, even with Council land. Where are some quantitative targets to be achieved in the Plan? If there are none then these are empty words.

Page: [Policy SI1 Improving air quality](#)

Section: [9.1.1](#)

9.1.1

Poor air quality is a major issue for London which is failing to meet requirements under legislation. Poor air quality has direct impacts on the health, quality of life and life expectancy of Londoners. The impacts tend to be most heavily felt in some of London's most deprived neighbourhoods, and by people who are most vulnerable to the impacts.

Yes but the spatial strategy in the Plan will affect the most deprived neighbourhoods, at least in Redbridge. All the increased transport congestion will be in Ilford South, while the rest of the Borough will actually see a decrease. It is the spatial strategy that is creating the inequality.

Page: [Policy SI7 Reducing waste and supporting the circular economy](#)

Section: [SI7](#)

?A 5)

1. designing developments with adequate and easily accessible storage space that supports the separate collection of dry recyclables (at least card, paper, mixed plastics, metals, glass) and food.

This is not possible in a lot of high-rise, highly dense developments as the Sainsbury proposal in Ilford for 700 flats showed clearly.

Page: [Policy SI8 Waste capacity and net waste self sufficiency](#)

Section: [Table 9.1](#)

Table 9.1 shows some figures. Redbridge has 196 tonnes in 2021 and 216 in 2041. Given that at the moment rubbish in and around Ilford lies on our streets on a daily basis and the problems with rats have grown to be one of the greatest in London, what does 196 mean. Where is anything in the London Plan about councils making sure streets are clear of waste. There needs to be a firm policy about this, otherwise the new developments will simply add to this waste on our streets with all the concomitant problems.

10.3.3

The Elizabeth Line, due to open in 2019, will increase capacity within central London by about ten per cent, relieving crowding on the Tube network, reducing journey times from east and west London to central London and the Isle of Dogs, and reducing congestion at Paddington, Liverpool Street and in the West End. This will mean that an extra 1.5 million people will be within 45 minutes' commuting distance of central London. The Elizabeth Line has been designed to allow for future increases in capacity, given the expected demand associated with an increasing population and growing employment in the areas it serves.

There has been no proper modelling to show how much extra capacity there will be for stations on the Elizabeth Line as this line already exists and is not new. There is a huge undercapacity at the moment with people at Ilford having to queue outside the station because of system overload. In addition there are developments all the way down the line from Shenfield onwards which will obviously add to passenger load. This is a recipe for disaster, as the line will simply not be able to cope with all the extra load.

C

1. Where it is not possible to provide adequate cycle parking within residential developments, boroughs must work with developers to propose alternative solutions which meet the objectives of the standards. These may include options such as providing spaces in secure, conveniently-located, on-street parking facilities such as bicycle hangers.

This is presuming that there is plenty of space around on the public realm. The spatial strategy creates highly dense areas with very little space for these parking facilities for the huge number of cycles. People do have to walk as well. The minimum cycle standards also need to take the above into account. If there was a sensible spatial strategy where there was the room, these standards would be ideal. However, this is not the case.

Page: [Policy T6 Car parking](#)

Section: [10.6.2](#)

10.6.2

Maximum standards for car parking take account of PTAL[145] as well as London Plan spatial designations and land use. Developments in town centres generally have good access to a range of services within walking distance, and so car-free lifestyles are a realistic option for many people living there. Opportunity Areas offer the potential to coordinate new transport investment with development proposals to embed car-free or car-lite lifestyles from the outset. Differences in car use and ownership between inner and outer London are recognised, with trip distances and trip patterns sometimes making walking and cycling difficult in outer London.

This is a view which is not based in reality. We have a huge problem with parking conflicts, delivery vans unable to find a parking place, cars being parked in front of houses with very little space. To achieve this policy there needs to be some legislation about car ownership at the same time. Otherwise, people do have cars, for holidays, because of children, because they want to visit relatives easily; socialize easily etc. It is not just for commuting to work. They will park these cars somewhere and it is the areas around the town centres that suffer. Until there is some legislation about ownership, this policy will just create more problems. It needs to take account of the reality of the situation and put in some parking. In Redbridge it will be the poorer wards that suffer as most of the housing is allocated there, which are already the most stressed in terms of parking.

12.1.3

A comprehensive set of complementary and more detailed data and performance measures sits alongside the KPIs in the AMR. Some of the KPIs from the previous Plan are included and those time series are therefore retained. Specific other policy areas that are not covered by KPIs but where measuring trends – in particular on monitoring key planning-related social issues - is important include:

- delivery of homes and jobs in Opportunity Areas
- delivery of primary healthcare floorspace
- provision of school places
- delivery of floorspace for childcare facilities
- provision of sports facilities
- reduction of London's digital 'Not Spots'
- change in overall green cover
- delivery of sustainable drainage.

It needs to be more fine-grained. Specific numbers need to be included for healthcare and education; space for sports facilities and green cover and where it is situated; homes and jobs in OAs for whom, what type of homes? It needs to have an equalities framework. Who is this benefitting; is there anyone who is being disadvantaged by it.

Where are any quantitative targets used. For the supply of new homes the monitoring is very vague. Words like increase, towards meeting are 'get out' clauses. We need numbers. The same for affordable homes. Numbers of each type of tenure should be included.

Transport

Increasing mode share of walking etc. should have a % attached to it. By how much.

Health

How does provision of cycle parking monitor how much Londoners engage in active travel? It doesn't

Air Quality

There are no measurements to be taken at various places in London and monitored to see what the pollution levels are across time. To monitor certain new developments to see if they are air quality neutral does not show how the air quality in London is changing.

Culture

You are monitoring no net loss of cultural venues. This is not fine-grained enough. This can mean certain areas can lose cultural venues if other areas gain them. This needs to be looked at so that poorer areas are not the ones that are losing and the richer areas gaining so it looks like net neutral.