



Directorate of Place

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Dear Mayor Khan,

Mayor of London - A City for All Londoners Consultation, December 2016

Thank you for the opportunity to comment on the Mayor's vision for London.

A City for All Londoners sets the direction of travel for a new London Plan. It is the first time that a document of this type looks across a number of different strategies including transport, housing, economic activity, the environment, health inequalities, culture and crime and policing. This coordinated approach is very much welcomed by the Council. The Council notes that the emerging Redbridge Local Plan supports the direction of travel outlined in the Mayor's document.

This letter forms the Council's response to the consultation. We look forward to working with the Mayor and the GLA on the production of the detailed strategies, particularly a new London Plan, which responds to the major challenges that London faces.

Accommodating Growth

It is noted in the consultation document that intensifying development around well-connected transport nodes and existing urban areas is logical from a sustainable transport perspective. However, the Council has concerns that this approach won't be sufficient, particularly when viewed in the context of sustainable development, existing character and creating healthy communities. Land is in high demand for many other competing priorities, including for schools, nurseries, community and health facilities. Therefore, a growth strategy focused so strongly on intensifying existing urban areas and suburbs to deliver housing has the potential of undermining the necessary supporting social and community infrastructure coming forward, creating places that do not function as sustainable places for people to live.

It is imperative that existing communities feel comfortable with local changes and that new developments are desirable places to be. Redbridge has specific experience of this issue, particularly in relation to the quantum of growth proposed in the emerging

Redbridge Local Plan. The densification of suburbs and town centres is a key concern for local communities. To respond to this, the preferred strategy in the draft Plan recognises the need to balance growth whilst recognising context and character. Existing character of areas is valued and important and this needs to be at the centre of the new London Plan's strategy to accommodate future growth.

Taking the above into account, a strategic view to accommodating and managing growth across London is required. The strong focus on increasing density of the suburbs and existing urban areas is at the expense of ruling out other important reasonable alternatives to accommodating growth. The Mayor is explicit about not intruding onto Green Belt land as a means of accommodating growth. This blanket approach to protecting green belt without an assessment of its current value and role will undermine the ability of London to meet its objectively assessed need and infrastructure needs in a sustainable manner.

Population projections necessitate that London look beyond its brownfield sites to accommodate growth and coordinate across the wider region on housing, employment and infrastructure provision. Many organisations, and particularly out of London local authorities, already view this as a key point for engagement and collaborative working.

Some authorities in the South East are already undertaking Green Belt reviews to find sufficient housing sites for their projected population growth. It is fundamental that London undertakes the same exercise. Cooperation on matters like Green Belt will be increasingly important for regional relations and must be undertaken to inform the new London Plan. Again, through work on the Redbridge draft Local Plan, the Council has direct experience in reviewing its Green Belt in order to accommodate housing and social infrastructure over the life of the Plan period.

The Council is very keen to engage with the GLA on the complexities surrounding Green Belt and welcomes joint working on this. We consider that there is no one solution that will meet the growth challenge, everything needs to be looked at in the round, including a pragmatic approach to London's Green Belt.

Redbridge's strategic location in the London-Stansted-Cambridge and Thames Gateway Corridors offers significant growth opportunities, further exploited by the arrival of Crossrail. The Council is a key partner in these initiatives and will play a vital role in the promotion and delivery of the economic growth of these areas. These opportunities need to be reinforced and recognised in the London Plan.

Housing

The Council supports the efforts being suggested by the Mayor to reduce the number of rough sleepers and tackle homelessness and recognise the leadership role he plays in establishing a pan-London approach to these problems.

The strong emphasis on working with the public sector such as the NHS to unlock delivery on surplus publicly owned sites is supported. The principle of 'Inclusive Neighbourhoods' will run throughout the new London Plan which will ensure that places are accessible to all, both young and old and from all backgrounds, imperative for social integration. This is also welcomed.

The Council supports the drive to increase the supply of housing and would support the ambition to deliver the target of 50% of all new homes to be affordable, while recognising that this is subject to viability. We also support the provision of a range of different affordable housing products including low-cost rented, the London Living Rent and shared ownership to meet the needs and aspirations of households on low and medium incomes. The Council is keen to explore this issue with the GLA and housing partners to ensure these products respond to needs at a local level.

The Council supports the intensification of housing development around stations and well-connected town centres to maximise the delivery of housing across all tenures and establish mixed communities in the most sustainable and best connected locations. However, as stated earlier in our response, development must be linked to the provision of sustainable infrastructure. The focus on intensification, including of suburbs, could also undermine opportunities to provide much needed family housing and this must be considered.

Proposals to encourage small and medium sized developers to play a greater part in housing delivery are wholeheartedly supported. The Council would like to see an emphasis on the use of local labour and apprenticeships to address the skills shortage and improve access to construction employment opportunities for local people.

The Council is of the view that a different outlook is needed on the Private Rented Sector particularly looking at ways in which it can be financed as an additional housing offer alongside the existing models of market and affordable housing and improving the quality of accommodation in this sector through licensing. To respond to this issue at a local level, the Council is introducing two selective licensing schemes in respect of privately rented properties in order to proactively manage complex issues such as significant anti-social behaviour and environmental crime.

In relation to innovative housing construction, the Council would like to see an increased focus on more innovative construction methods that will deliver good quality housing that can be delivered more quickly. The Mayor could play a coordinating role in this through the establishment of a contractor/consultancy framework for modular construction.

Employment and Town Centres

The Council is keen to ensure a diverse local economy, focusing on improving existing employment land to attract new investment. Therefore, increasing the capacity, quality, and density of the borough's Strategic Industrial Locations (SILs) is a key objective of the Redbridge Local Plan. It is noted in the document that industrial land within London could be relocated/co-located to deliver potential higher density housing. Given the Council's objective around facilitating economic growth, we would have concerns around the release of SIL for housing and would welcome early discussions with the GLA on this issue.

Through wider visioning work, the Council is committed to enhancing Ilford's profile and performance to ensure it becomes a London town again. The arrival of Crossrail is the major catalyst for investment and change. The Council's vision for Ilford Metropolitan Town Centre needs to be reinforced in the new London Plan. We are keen to explore the potential for joint working with the GLA in preparing an Opportunity Area Planning Framework (OAPF) for Ilford, recognising the wider regeneration work that is underway, as well as its designation as a Housing Zone. An Ilford OAPF would enable the Council and the GLA, in partnership with the private sector, to deliver change, attract investment and provide certainty to key stakeholders and delivery agencies.

The Council supports the Mayor's commitment to protecting the arts/culture/creative sectors as key assets, not just in central London locations, but across the capital. As such, reference to designating Creative Enterprise Zones is welcomed. The cultural diversity of Ilford's community offers an opportunity to create a vibrant and attractive town centre, with clusters of opportunities for high quality leisure and culture uses and a new civic presence. The intention to protect and promote creative workspace is also welcomed.

It is recognised that structural changes in the retail sector provides challenges and opportunities, which will particularly affect District Centres. Therefore, a proactive and strategic approach to London's town centres is required ensuring they continue to thrive and attract investment.

The successful regeneration of our town centres and the health and wellbeing of our residents are key priorities for the Council. The proliferation of uses such as shisha bars is a growing concern among residents' in the borough, particularly from a health and wellbeing perspective. To respond to this, the Council has set up a multi-departmental team consisting of Environmental Health, Consumer Protection and Planning Enforcement to tackle issues associated with shisha bars. There is the potential for the new London Plan to place greater emphasis on the wider cross-cutting issues associated with the clustering of town centre uses, particularly their impact on health and wellbeing.

Environment, Transport and Public Space

Increasing the capacity of London's transport capacity is fundamental to supporting growth. The Council welcomes reference to improvements on the Central Line, with a proposal of running up to 36 trains per hour on the line by the end of 2030. Overcrowding on the Central Line is a significant concern for the borough's residents and the Council is keen to engage early on any planned improvements which can alleviate this pressure. In addition to this, there is the need to look at improving east-west bus route connections. For a borough like Redbridge, improved bus routes are required to connect people better to town centres where many of their jobs are.

The consultation document indicates a stronger stance on environmental protection through reduced car use and tackling air quality. Encouraging more trips on foot or by bike as part of the Mayor's overall plan for 'Healthy Streets' is welcomed. These initiatives, designed to reduce overcrowding, will also be instrumental in improving air quality, reducing health inequality, making the roads safer and contributing to a better quality of life in Redbridge. This effective approach to policy integration is supported and is one which is replicated in the Redbridge Local Plan.

Promoting higher density (including tall buildings in the right locations) whilst recognising the need to respect existing character; including of local neighbourhoods and town centres is welcomed. The location of tall buildings relates back to the wider issue of densification in existing town centres, and one which is of significant concern to many residents' in Redbridge. It is noted that the consultation document states that tall buildings will only be permitted if they can add value to the existing community – in line with the principles of 'good growth'. This is welcomed and the Council's emerging Local Plan policy on tall buildings reflects this approach.

The move towards 'healthy streets' in recognition of limited road space and capacity issues on the Underground is particularly welcomed, both from a health and well-being perspective and promoting more cycling and walking. This initiative envisages a more clean, green, resilient and attractive city which the Council supports.

Further joint-working

Overall, the Mayor's City for all Londoners signals a welcome intention for responding to the significant challenges that London faces.

However, the Council is concerned that the lack of detail could be a concern as a precursor to any draft new London Plan and welcomes further joint-working to explore the issues set out above. More complex discussions are needed, particularly in relation to Green Belt release alongside the impact of more intensification and the implications this will have on quality of life, character and sustainability. These are interrelated issues and must be dealt

with in that way.

The Council looks forward to continuous working with the Mayor throughout the production of a new London Plan.

Yours sincerely,

A handwritten signature in black ink, reading "Joanne Woodward". The signature is written in a cursive style with a large initial 'J' and a trailing flourish.

Joanne Woodward

Strategic Head of Planning and Building Control