

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

Issue 9

Are the policies relating to achieving quality design and to tall buildings in Section 5 (policies LP26-LP33) justified, consistent with national policy and will they be effective?

1. LBR 2.77 Tall buildings study dated April 2017 was not available until this month, yet Regulation 19 submission closed on 30/9/2016. This suggests that the Council is seeking to bolster its evidence base in the wake of opposition to 30 storey buildings, rather than through open consultation. The purpose of LBR2.77's preparation is therefore questionable and it would not appear to fulfil NPPF paragraph 69- 'local planning authorities should aim to involve all sections of the community in the development of Local Plans and in planning decisions'.

2. Tall buildings are disliked by the majority of residents in all parts of the borough. The benefits of tall buildings appear to be density matrix issues and developer's viability concerns not aesthetic considerations, using the tall buildings definition of being over 30 metres primarily to meet London Plan targets and ignore local need which favours other typologies.

3. The Local Plan is written with a bias to emphasize the urban nature of Ilford South and to avoid stating that other areas such as South Woodford, Barkingside, Wanstead and Snarebrook can also be considered to be urban. It is only in the Council's response to the Housing Growth issue Appendix 1 'Justification for general 'settings' in application of densities on Development Opportunity sites', where the urban nature of the other areas is stated clearly.

4. The discrimination already referred to in previous statements by NOISE is clear to see in the policy on tall buildings. Only areas in Ilford South are named and designated for tall buildings. This is purely an arbitrary process, with no clear rationale for the selection, other than the areas in Ilford South are in the more deprived and ethnically more diverse part of the borough. LBR 2.77 uses sightlines taken from vantage points where tall buildings have the least impact. Ilford's heritage buildings risk being engulfed and not contributing to place-making.

5. Up until the submission of the Plan, the designation of Seven Kings, Goodmayes and Chadwell Heath were as District Centres. Thus, a designation has been erroneously given in order to facilitate the imposition of tall buildings on Local Areas. The designation has only been changed after submission of a modification by a councillor. The one 'landmark' building designation for South Woodford District Centre in the Plan has been removed by modification, yet those in Ilford South Local Areas remain.

6. The Tall Buildings in Redbridge evidence base document (3.7.6) states: "While Ilford is a natural centre of intensification and redevelopment on the basis of the facilities available and the high level of public transport accessibility, proposals do need to have due regard to the surrounding

low density residential and also the listed and locally listed buildings threaded throughout the area." Also (3.7.3) " Local views should be selected and analysed in relation to specific proposed development locations, taking into consideration: relationship to neighbouring building heights.

7. Local planning policies are expected to align with the principles of NPPF Section 7 "Requiring Good Design", within which building height is a key consideration; however BD2 – Tall Buildings of the existing Borough wide Primary Policy Development Plan Document gives little weight to the unacceptable harmful impact of tall buildings on their surroundings, with little or no concern for the privacy and amenity of adjoining residents in established residential areas. The recently approved Exchange car park development has shown complete disdain for the amenity and well-being of local residents. The bulk and height of the proposal is totally incongruous with the surrounding area and yet it has been positioned at the rear of the Exchange on the edge of a residential housing area, where it will dominate the skyline and severely impact on the privacy and overshadowing of the local residents, due to the overlooking nature of the scheme.

8. The Council wishes to downplay the fact that tall buildings' planning applications have been challenged and gives false and misleading data in its appendices. It does not state the fact that site 1, the application for the 30 storey Sainsbury development was rejected and that the case will be going to inquiry. It also implies that site 149 has been granted planning status, when actually it was turned down on the basis of the impact of the development in terms of massing and bulk, amongst other things. The GLA, itself, is challenging LBR on tall buildings, as the recent criticism of the Harrison Gibson development shows. The effects on residents' amenity and pedestrian use is shown to be not acceptable.

9. The recent Grenfell Tower tragedy is a stark reminder that the health and safety of residents must be of paramount importance in tall buildings. In the Ilford Recorder of 14th June 2017 there is a statement from the Council: 'Redbridge Council has 18 housing blocks above 5 stories and we have fire risk assessments in place for all our housing stock including the taller blocks. We will be carrying out a review of these along with reviewing our fire compartmentation reports, which relate to restricting the spread of fires within buildings. Councillor Athwal said the council would be taking guidance from the London Fire Brigade, and advised residents to check their escape plans. However, in Redbridge, it is not only Council stock but increasingly private housing that is the issue. The Council cannot just focus on Council housing, having so little of it, but needs to look at the whole of the sector. We need robust policies in the Plan that take into account the recommendations of the report into the Lakanal House fire and ensure they are implemented for all tall buildings.

10. Recent tall buildings in Ilford South have poor compliance issues for various reasons that do not inspire confidence e.g. Gabrielle House, Pioneer Point. Scaffolding was erected around Pioneer Point for years with no clear explanation as to the cause but rumours that the wrong type of glass, which shatters had been installed. After the Grenfell fire Kennedy Wilson, the owners of Pioneer Point, said it recently invested in the skyscrapers' fire safety. A spokeswoman said: "Pioneer Point was fire compliant at the time of our acquisition and we invested a further £7m of capital expenditure into the building, which included a full Health & Safety programme and further enhancing the building's fire safety. "We have worked in detail on the fire strategy with third parties and are confident that we have a robust fire strategy in place.

11. Not only do they need to be confident but so do the residents and this can only be done by having policies to ensure detailed information on

health and fire safety in private high rise buildings is made public. The issues with Gabrielle House which has had a web of scaffolding and netting surrounding it to this day have never been disclosed. People including children, have been living in dark, unhealthy conditions and it has been a blight on the landscape for years.

12. We also have evidence that care for residents has sadly been lacking in the way private management companies deal with the issues of living in tall buildings in Ilford South. There was a fire on the third floor of Westside Apartments, a tall building in the heart of Ilford Town Centre on Friday 30th November 2016 and the third floor was evacuated. However, there were no fire alarms in the communal areas to notify residents of the issue. Due to the horrendous parking issues, the fire engines couldn't get through to the back of the building and had to take the fire hose up the stairs directly to the fire. A resident who has serious mobility issues, on the second floor, had to go down wet stairs, luckily with help from other residents because the firemen could not access her flat from outside. The residents are very worried about incidents like this in the future, which could be even more serious. There has been no communication from the company who are meant to manage the apartments (L&Q) to the residents since that incident to reassure all residents of their safety within the building.

13. Policies need to give residents a voice and the right to be provided information when they ask for it eg L&Q should have provided a copy of the report by the London Fire Brigade following their inspection of the building on 1st October 2016 to all residents but have not done so. They need to answer residents' concerns such as clarifying and communicating how the communal fire alarms are supposed to work in case of a fire. They need to acknowledge risks to personal safety that present in the event of fire, such as parking issues blocking access for the fire engine and outline how they propose to rectify this situation within a specified

timescale to avoid similar risks occurring in the future. LBR 2.77.1.4
NPPF does not provide guidance on tall buildings policy other than
through 'a presumption in favour of sustainable development'. This needs
to be comprehensibly defined in the Plan.