

CED029 Council's Response to Issue 8

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?

i) Do the policies in the Local Plan adequately address climate change issues having regard to section 19(1A) of the 2004 Act?

- 1.1 The Council considers policies in the Local Plan do adequately address climate change issues having regard to section 19 (1A) of the 2004 Act. The Plan's objective 'Promoting a Green Environment' alongside policies within Section 4 of the Plan as well as policy LP32 are all designed to secure that the development and use of land in the borough contributes to the mitigation of, and adaptation to climate change. The approach is also in line with paragraphs 94, 95 and 97 of the NPPF. Furthermore, the approach to climate change in the Local Plan is in conformity with the suite of London Plan policies.
- 1.2 The Council aims to tackle the causes of climate change in the borough by ensuring developments use less energy and assess the feasibility of decentralised energy and renewable energy technologies. It is important that planning policy limits carbon dioxide emissions from new development wherever possible and supports sensitive energy efficiency improvements to existing buildings.
- 1.3 Policies LP19 and LP20 set out the Council's approach to addressing climate change mitigation and promoting low carbon and renewable energy. Policy LP32 further seeks to manage the effects of climate change by requiring sustainable design and construction methods in development proposals.

ii) In Policy LP19 is reference to the energy hierarchy in criterion (a) sufficiently clear? Is it reasonable to apply this provision to "all development"? In what circumstances will criterion (b) apply?

- 2.1 The Council considers criterion (a) in LP19 could be made clearer. The energy hierarchy comes from London Plan policy 5.2 which states that development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the energy hierarchy.
- 2.2 The Council proposes the following modification to criterion (a):

"Promoting zero carbon development and requiring all developments to reduce carbon dioxide emissions through following the steps in **line with the London Plan policy 5.2** energy hierarchy"

- 2.3 To provide further clarification delete first sentence of supporting text in paragraph 4.3.2 and replace with:

New developments in Redbridge will be expected to be designed to minimise energy use and CO2 emission in operation through the application of the energy hierarchy set out in London Plan Policy 5.2. It states that development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the energy hierarchy, as follows:

Insert a new paragraph after 4.3.3 to read:

Be Lean

Proposals should demonstrate how passive design measures including the development orientation, form, mass, and window sizes and positions have been taken into consideration to reduce energy demand, demonstrating that the minimum energy efficiency requirements required under building regulations will be met and where possible exceeded. This is in line with stage one of the energy hierarchy 'Be lean'.

Be clean

The second stage of the energy hierarchy 'Be clean' should demonstrate how the development will supply energy efficiently through decentralised energy.

Be green

All major developments will also be expected to demonstrate how relevant London Plan targets for CO2 reduction, including targets for renewable energy, have been met.

- 2.4 The Council considers it is reasonable to apply criterion a) to all major development as it accords with the three step approach set out in the energy hierarchy. The first step in the hierarchy, to reduce energy demand, should be met through adopting sustainable design principles outlined in Policy 5.3 of the London Plan. The second step, to supply energy efficiently, should be met by prioritising decentralised energy, as outlined in Policies 5.5 and 5.6 of the London Plan and Local Plan policy LP20. The third step, to use renewable energy, is outlined in Policy 5.7 of the London Plan and Local Plan policy LP20.
- 2.5 By including reference to the energy hierarchy in criterion a) and inserting further supporting text to provide clarification, it is considered that Criterion b) is no longer required and should be deleted.

~~b) requiring development to incorporate renewable energy and low carbon technologies;~~

iii) In paragraph 4.3.7 there is reference to the potential for large scale renewable energy in the north-east corner of the borough. Having regard to the Written Ministerial Statement of 18 June 2015 and paragraph 97 of the NPPF is the Council intending to identify any sites as suitable for wind energy in the Local Plan?

3.1 The Council is not intending to identify any sites for wind energy in the Local Plan. No planning applications or pre-application enquiries have been forthcoming or subject to consultation with affected local communities, as would have been required having regard to the Written Ministerial Statement of 18th June 2015.

3.2 Modification number 80 in the Schedule of Modifications (LBR1.01.2) makes clear that large scale wind energy proposals could compromise the openness of the Green Belt. For this reason, the potential referred to in paragraph 4.3.7 of the Local Plan has been discounted. This approach is considered consistent with the NPPF, which notes at paragraph 91 that *"when located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development"* and paragraph 97, which refers to the need to consider adverse impacts *"including cumulative landscape and visual impacts"*.

iv) Has potential flood risk been adequately addressed by Policy LP21? Has the Local Plan been prepared in accordance with Diagrams 2 and 3 of the PPG on Flood Risk and Coastal Change?

4.1 Subject to modifications 86 – 91 in the Schedule of Modifications (LBR1.01.2), which have been agreed with the Environment Agency as set out in LBR4.01, Policy LP21 adequately addresses flood risk. As amended, the policy seeks to protect the functional flood plain, direct vulnerable uses away from areas of highest flood risk, and require site specific Flood Risk Assessments and mitigation measures such as flood resistant and resilient design, and the incorporation of SuDS into new developments, where appropriate.

4.2 The majority of Development Opportunity Sites identified in Appendix 1 of the Local Plan fall within Flood Zone 1, and as such the sequential and exceptions test do not apply to their allocation.

4.3 Where sites included in Appendix 1 have been identified through the Level 2 Strategic Flood Risk Assessment (LBR2.61.2) as falling in flood zones 2 or 3, or medium to high surface water flood risk, diagrams 2 and 3 of the PPG on Flood Risk and Coastal Change have been applied. This is documented in the Flood Risk Sequential and Exception Test (LBR2.60) – the conclusions of which are supported by the Environment Agency.

v) *In promoting sustainable transport has the Local Plan made adequate allowance for the likely impact of Crossrail?*

- 5.1 The Local Plan has identified the potential of Crossrail, now called the Elizabeth Line. In recognition of this, the plan includes Policy LP1B Crossrail Corridor Investment and Growth Area in order to maximise the enhanced accessibility and improved connectivity that Crossrail will bring. This is one of five Investment and Growth areas identified within the borough. The Local Plan will direct and facilitate significant investment and growth within the Crossrail Corridor. The Council is working in partnership with the strategic transport authorities and is investing in renewing transport infrastructure and the complementary public realm.
- 5.2 These improvements will support the development of 5,000 high quality new homes; approximately 7,500 m² of retail floorspace, 3,500 m² of office and commercial floorspace, which will further diversify the range of uses and jobs within the corridor. In relation to community infrastructure, the Plan identifies the need for 3 new minimum 8 form entry secondary schools, a health hub as part of the proposed redevelopment at King George and Goodmayes Hospitals and investment in Newbury Park Health Centre.
- 5.3 The Council's overall development strategy is to locate new homes (including tall building zones), jobs and other high trip generating uses such as large retail and community facilities within the five Investment and Growth Areas. Locating such uses in these accessible locations will not only generally reduce the need to travel in the borough but also enable high trip generating uses to benefit from the most sustainable forms of transport. The Council will therefore seek to improve links and connectivity between and within the five Investment and Growth Areas.
- 5.4 Redbridge Local Plan Objective 2: Promoting a Green Environment covers sustainable transport. The objective states;
- Encourage sustainable patterns of transport by improving walking and cycling routes;
- 5.5 Local Plan policy LP22: Promoting Sustainable Transport outlines the sustainable transport measures that will be implemented within the borough. It makes specific reference to the implementation of Crossrail and the delivery of public realm station improvements in the Ilford and Crossrail Corridor Investment and Growth Areas.

- 5.6 With respect to promoting sustainable transport in the Crossrail Corridor Policy LP1B makes specific reference to;
- Key Crossrail infrastructure – Seven Kings, Goodmayes and Chadwell Heath station improvements.
 - The complementary public realm improvements in the vicinity of the stations
 - The existing good system of public transport within the corridor (3.4.12)
 - Further improvements to cycling and walking routes to improve access to the stations and other key destinations in the corridor (3.4.12).
- 5.7 Furthermore, policy LP22 1(c) and supporting paragraph 4.9.2 explains how important the implementation of Crossrail is as an essential component of the growth strategy articulated in the Local Plan. Creating and improving access and links within and between growth areas is also essential to the delivery of successful places. This is reflected in LP1B and LP22.
- vi) *Does the Local Plan adequately address the impact on vehicular transport? The Transport Assessment (LBR 2.50) forecasts in section 5.7 that 7 junctions and 3 links will experience a net increase in traffic of over 20%. Will this have a significant effect in terms of delays and/or queuing and, if so, what mitigation measures might realistically be undertaken?***
- 6.1 The Transport Assessment (LBR 2.50) has assessed the impact on vehicular transport. The Transport Assessment modelling tool has been used to forecast increases in traffic volumes at a number of key junctions and links arising from the cumulative effect of all the proposed development in the Local Plan. This is the first step in understanding if the transport network can cope with additional traffic volumes and where the pressures are greatest. The model allows each site to be assessed individually or in combination with other sites to test capacity increases at each of the key junctions and links.
- 6.2 Where demand is greater than 20% of existing flow some mitigation is expected but any increase in traffic loads could be potentially significant. The next step in quantifying the mitigation works is to establish the spare capacity at each key junction and link. This work will be linked to the next round of modelling that considers the major regeneration sites in greater detail and the costs of the mitigation works will be assigned to the contributing sites from the Transport Assessment modelling tool.
- 6.3 Consideration will be given as to when any mitigation measures are required to be implemented to allow for combinations of development coming forward that will require specific junction / link improvements to

be advanced. As each site comes forward, its specific impacts will be assessed and suitable local and strategic mitigation measures determined as part of the incremental delivery of the wider network improvements. These studies may be funded by the developer themselves, or from the Council's Community Infrastructure Levy (CIL) funding pot.

- 6.4 Mitigation may be required to be implemented before, during or after completion of a development and may be completed in incremental stages as development takes place. Mitigation measures can include both 'soft' and 'hard' interventions and indeed, may include a mix of both. Examples of potential mitigation measures are set out in section 7 of the Transport Assessment.
- 6.5 Planning conditions can be used to dictate what development can take place e.g. car free development, and via a Grampian condition, when development can take place with respect to any mitigation measures required.
- 6.6 To further supplement the findings of the Transport Assessment, some additional work has been undertaken to identify the junctions and links that are likely to become saturated from the proposed Local Plan allocation sites and the proportional impact of the allocation sites at these junctions and links. Please see CED117 Transport Assessment Supplementary Technical Note (2017) for more detail.
- 6.7 The Transport Assessment (LBR 2.50) identified 22 key junctions and 7 key links within the borough based on the core growth areas. Of these, 7 junctions and 3 links were forecast to experience a 20-30% net increase in traffic arising from Local Plan site allocations.
- 6.8 In order to understand the significance of the forecast net increases in the Transport Assessment in more detail, in the context of forecast capacity and delay in 2031, TfL's East London Highway Assignment Model (ELHAM) was reviewed to determine the junctions and links that are expected to be operating over capacity by 2031. As a result of this analysis, potential mitigation measures have been suggested. In particular, Table 5 of the Technical Note provides a high level review of the types of hard measures that may be considered, based on the junction type. The Council considers this level of assessment justifies future application assessment work on these specific areas, so that targeted mitigation can be designed and funded fairly.
- 6.9 To align the evidence base findings with the Local Plan, particularly policy LP22, the following modification is suggested to criterion (i):

"resist new development that results in an unacceptable adverse impact on traffic congestion within the Local and Strategic Road Network at key

junctions and links or public transport system unless it incorporates effective mitigation measures, as listed in the Transport Assessment Supplementary Technical Note (2017)

- 6.10 To provide further guidance on what potential mitigation measures could realistically be undertaken, include a new paragraph in the supporting text after paragraph 4.9.5 as follows:

Vehicular Transport

The Transport Assessment (2017) forecasts that 7 junctions and 3 links will experience a net increase in traffic of over 20% as a result of the borough's proposed growth. As such, where a significant impact has been identified, for example where significant delay or capacity issues have been identified and where the net increase in traffic arising from developments is expected to be significant, it may be appropriate for mitigation measures to be considered. These could include both 'soft' and 'hard' interventions and indeed, may include a mix of both measures.

Further evidence set out in Local Plan Transport Assessment Technical Note (2017), in particular based on the junctions and links that have a high or medium potential for requiring mitigation measures by 2030, includes a high level review of the types of 'hard' measures that may be considered, based on the junction type. These do not represent a definitive set of mitigation measures, and the Council will expect, as part of any future planning application, that further work is undertaken to consider local impacts and cumulative effects of other development.

Appendix C of the Technical Note includes a map showing the junctions and links and corresponding mitigation potential categories.

- vii) In modification 97 (LBR 1.01.2) to Policy LP22 is the reference to a "construction logistics plan" in criteria k) correct?**

- 7.1 Modification 79 to criteria k) is incorrect. It should read "Delivery and Servicing Plan".

k) Require new development to provide a ~~Service Management Plan~~ Servicing and Delivery Plan to ensure that development can be adequately serviced within the site, to encourage shared servicing arrangements and ~~timing~~ consolidation of deliveries;

viii) In modification 108 (LBR 1.01.2) why are London Plan parking standards not to be used in all PTAL areas? Which section of The London Plan justifies the use of minimum parking standards in outer London boroughs? Is modification 109 to criterion 7 regarding the dimensions of disabled parking bays correct? Should it be 6m by 3.6m in accordance with R1213/26a?

8.1 Following further clarification, it is proposed to apply London Plan parking standards in all PTAL areas.

8.2 As such it is suggested that modification 108 is further modified as follows:

Amend Policy LP23 as follows:

"1. The Council will ensure new development provides sufficient cycle and car parking by:

(a) Seeking new development to meet the minimum and maximum parking standards set out in Appendix 7. For residential development, London Plan Parking Standards will apply.

Where a lower provision of parking is proposed than that indicated as a maximum standard and where no minimum standards apply, proposals will be considered on the basis of the following:

i Transport Assessment, which indicates adherence to Green Travel Plan ~~planning~~ measures and contribution to local sustainable transport schemes;

ii Levels of public transport accessibility; and

iii Availability of public on-street parking and the outcomes of any parking stress survey."

Amend policy wording as follows:

"2. Supporting residential development within Growth and Investment Areas that are in close proximity to public transport nodes to be low parking development in line with the London Plan standards

6. Requiring secure accessible and sheltered cycle parking in accordance with the London Plan; and

7. Regular car parking spaces should achieve a minimum size of 4.8m by 2.4m. Those intended for use by disabled people should be at least 6m by 3.6m ~~4.8m by 2.7m~~; and;

Amend para 4.13.3 as follows:

The Council's approach to off-street car parking standards is to ensure

that parking is not over-provided at destinations served by good public transport (maximum levels of provision), but to recognise and respect the decision many residents make to continue to own a car and ensure that adequate levels of off-street parking are provided. ~~in new residential development in areas with lower levels of PTAL. The provision of minimum standards for residential development in areas of low PTAL is consistent with London Plan guidance that outer London boroughs should consider higher levels of provision in low PTAL areas to address 'overspill' parking pressures.~~

- 8.3 It is acknowledged that modification 109 is incorrect and should read 6m by 3.6m in accordance with R1213/26a:

7. Regular car parking spaces should achieve a minimum size of 4.8m by 2.4m. Those intended for use by disabled people should be at least 6m by 3.6m ~~4.8m by 2.7m~~; and

ix) *The Air Quality Report (LBR 2.51) indicates that the overall impact of the proposed development sites is likely to be negligible. In view of this would Policy LP24 be effective when assessing individual proposals?*

- 9.1 The rationale behind policy LP24 is to mitigate the impact of development on air quality and other pollutants, and to ensure exposure to poor air quality is reduced. The policy will be effective when assessing individual proposals for air quality neutrality, because it allows the Council to evaluate whether statutory prescribed air quality neutral benchmarks and air quality objectives are being achieved, and to determine which remediation is appropriate.

- 9.2 Policy LP24 requires that an air quality assessment is undertaken for all major development schemes in all parts of the borough, that are likely to increase pollutant concentrations. Such an assessment will provide more detail than what is set out in document LBR 2.51 as it will be based on a detailed planning application with far more specifics about the number of homes proposed, or the mix of uses, proposed parking provision, which will better inform air quality assessments.

- 9.3 It should also be considered that the entire borough has been designated as a Local Air Quality Management Area (LAQMA) and is monitored for nitrogen dioxide and other more harmful particulate matter, with annual status reports produced by the Community Safety Service Pollution & Public Health Team. This information is readily available and can usefully aid Policy LP24 by providing a data baseline against which planning applications can be considered, adding to the effectiveness of the policy.

x) *Modification 119 (LBR 1.01.2) refers to digital infrastructure but should its provisions relate to all new development proposals? How should development be designed to facilitate delivery? How will a planning policy deliver "ultrafast" connections?*

- 10.1 The rationale behind this modification is to encourage developers to co-operate and contribute to the provision of high quality broadband connections, particularly in Investment and Growth Areas to attract investment and new business.
- 10.2 Upon reflection, it is recognised that the two policy requirements set out in modification 119 are overly prescriptive. However, the Council still considers they are important, particularly to help facilitate telecommunications development like high speed broadband technology as being essential for sustainable economic growth and in enhancing the provision of local community facilities and services. As such, it is therefore suggested that policy LP25 is further reworded as follows:
- 10.3 Delete two policy criteria from new criteria h) and replace under the Implementation section as follows:

~~This will be achieved by requiring new development proposals to:~~

~~Be designed in such a way as to be capable of facilitating delivery of high speed broadband technology; and~~

~~Deliver “ultrafast” connections in Investment and Growth Areas.~~

Implementation

3. Through pre-application discussions, the Council will encourage applicants to consider how new developments can be designed in such a way that would assist with the delivery of high speed broadband technology.