

## CED030 Council's Response to Issue 9

### **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?**

- i) **In Policy LP26 is it reasonable to expect development to improve the character and quality of an area and the way it functions? Does the policy sufficiently allow for innovation, originality or initiative or are criteria (d) and (g) overly prescriptive? Is criterion (j) clear or necessary? Are the provisions of criterion (m) justified or are its requirements excessive bearing in mind that Policy LP30 (f) seeks to avoid adverse impacts and Policy LP30 (i) refers to respecting privacy for household extensions?**

- 1.1 The aim of Policy LP26 is to positively encourage good design within the borough, as advised at section 7 paragraphs 56 to 68 of the National Planning Policy Framework (NPPF). It is reasonable to expect development to take the '*opportunities available*' to improve the character and quality of an area and the way it functions, as stated in national policy; however Policy LP26 as drafted suggests that all development in all circumstances should achieve these aims in order to receive planning permission; the policy should be modified to clarify that this is not the case. **Suggested modification:** change the first paragraph of Policy LP26 as follow:

*The Council will require good design and 'place making', and will seek high quality design in all development within the borough. Innovative and good design will be encouraged and promoted, and development of poor design, that does not take available opportunities to improve an area's character and quality, and the way it functions ,~~that does not improve the character and quality of the area and the way the area functions,~~ will be refused planning permission.*

- 1.2 Criteria in Policy LP26 has been drafted to express overall national policy with regard to design (section 7, NPPF paragraphs 56-68). The policy clearly states in the first paragraph that '*...Innovative and good design will be encouraged...*' and the objective is to allow developers to bring their own expertise to new development in this regard. The Council considers that innovation and integration with the surrounding context is a challenge that good design should rise to, and that LP26 as drafted represents a strong policy approach. However in recognition that strong policies need to reach a balance in consideration of a number of issues, and to make Policy LP26 less prescriptive, the policy will be modified to better reflect the aim of encouraging innovation and initiative from the developer. **Suggested modification:** make the following changes to criteria d) and g) in Policy LP26, as follows:

*d) ~~Is well integrated to a high degree of compatibility with the surrounding area, and has regard to and respect for the surrounding area, in terms of: layout, form, style, massing, scale, density, orientation, materials,~~*

*and design, in order to reinforce the positive and distinctive local character and amenity as described in the Redbridge Urban Characterisation Study (2014), or its updated equivalent;*

*g) ~~Responds correctly to, and is completely integrated with~~ Respects the existing layout of buildings, surrounding streets, open spaces and patterns of development. The layout of new development should create direct, recognisable, through routes that improve legibility and movement through places, and positively contribute to street frontages;*

- 1.3 It is clear that criterion J refers to the appropriate provision of amenity space for development, and that policy LP29 'Amenity and Internal Space Standards' should be considered in this regard. This criterion has been included to encourage developers to cross refer to LP29 when considering the design of their proposals. However, criterion J does not add anything to Policy LP26 that should be given further consideration beyond what is already outlined in LP29, and is not an essential part of Policy LP26.

**Suggested modification:** delete criterion J from Policy LP26.

***LP26: Promoting High Quality Design....***

*...(i) Is designed to minimise crime and anti-social behaviour, creating safe and secure environments;*

*~~(j) Provide an appropriate level of amenity for buildings, as outlined in LP29;~~*

- 1.4 Criterion m) has been included in Policy LP26 to consider the effect that all development could have on sites with neighbouring occupiers, seeking to avoid any negative impacts. It is considered that its provisions are justified and provide clarity that the protection of neighbouring amenity will form part of the assessment of planning applications submitted to the Council for determination. Policy LP30 is related specifically to household extensions, and the effect that householder development can have on neighbouring development, and the provisions within its criteria are far more specific to this type of development.

*5.1.13. The Redbridge Characterisation Study illustrates that the character and context of localities varies significantly throughout the borough. Consequently new development in the borough should respond positively to and respect local character and context, make positive architectural and urban design contributions to locations, must be well integrated with the surrounding area, and should preserve or enhance the special character of areas of historic and architectural value. Policy LP26 relates to all development, regardless of scale and form. The policy seeks to direct residents and developers to consider the impact of proposals upon the character and amenity of existing developments and neighbouring properties. The Council seeks to protect residential amenity and privacy throughout the borough. Policy LP30 provides additional guidance in relation to household extensions.*

**ii) What is the justification for modifications 124 and 125 (LBR 1.01.2)? Where is Figure 21? Have the recommendations of the Tall Buildings Study (LBR 2.77) been incorporated? Is the Tall Buildings Study adequate and robust?**

- 2.1 Modifications 124 and 125 were made in response to the updated evidence base regarding tall buildings in the borough, (LBR 2.77, Tall buildings in Redbridge: Evidence Base 2017) and in response to a number of representations received through the Regulation 19 consultation process, (in particular R01208/01, LBR 1.01.1 Redbridge Local Plan Representations).
- 2.2 Representation R01208/01 stated that Policy LP27 'Tall Buildings' does not comply with the Mayor's London Plan, in particular Policy 7.7 'Location and Design of Tall and Large Buildings'. The representation suggested changes to strengthen links to London Plan Policy, which the Council sought to do and considered would strengthen Policy LP27.
- 2.3 Policy LP27 Tall Buildings takes a new approach for managing tall buildings in Redbridge in light of new evidence. Document LBR 2.77 reviewed and updated evidence for tall buildings, including an assessment of existing/consented tall buildings in the borough, and sought to test where new tall and large buildings would be most appropriately located; including an appraisal of options. The document also updated evidence on current tall buildings policy implementation, and made recommendations for modifications to Policy LP27 to make it more effective in the assessment and determination of future planning applications proposing tall buildings.
- 2.4 Modification 125 was made by the Council specifically to make the definition of tall buildings in the Local Plan more prominent in the supporting text of Policy LP27; this was one of the recommendations within LBR 2.77.
- 2.5 Figure 21 is the Building Height Gradient Map for Redbridge (attached as Annex 1 to this Statement), and is Figure 163 on page 129 of LBR 2.77. The map indicates where tall building clusters and tall buildings suitable for the local context can be accommodated in the borough and it will be inserted into the Local Plan as a new figure.
- 2.6 The recommendations put forward in LBR 2.77 have been incorporated where the modifications would have a positive effect on Policy LP27 as a whole. In particular key recommended modifications have been made with regard to:
- the borough's spatial hierarchy, linked to the building height gradient map;
  - explicit referencing of London Plan Policy 7.7 in relation to assessing development proposals;
  - sign-posting of other relevant Local Plan policies that tall buildings will be assessed against, within the text of Policy LP27;

- supplementing criteria within the policy and supporting text with further criteria relevant to tall buildings, sourced from the application reviews in Section A of the document;
  - updating the local validation checklist to require additional supporting documents for tall buildings applications.
- 2.7 It is considered that these and other modifications strengthen Policy LP27 and respond to supporting evidence regarding tall buildings in the borough.
- 2.8 The Tall Buildings Study is considered to be a robust document that adequately supports the policy position in Policy LP27. The study considers the provision of tall buildings within the borough at both a strategic level and through detailed consideration as to how policy should inform the assessment and deliverability of individual developments proposing tall buildings. To deliver this outcome the study includes a comparison of tall building policies and policy implementation in other Outer London areas with a similar development context to Redbridge. Scenario testing has also been developed to assess the impact of developments including tall buildings at a number of key opportunity sites assessing these options against the key policy criterion of LP27 including:
- townscape and visual analysis;
  - analysis of impacts on local townscape, key views and heritage assets; and
  - analysis of the microclimate impact.
- 2.9 The study has informed modifications to the approach of Policy LP27. In particular these modifications have introduced a gradient map to provide greater flexibility to the designation of areas within which tall buildings may be considered in principle to be acceptable; subject to further assessment in accordance with London Plan Policy 7.7 and Local Plan Policy LP27. The Council considers the evidence justifies the policy approach set out in LP27.
- iii) Is modification 126 (LBR 1.01.2) to Policy LP28 on advertising and shopfronts consistent with the Advertisement Regulations and are its restrictions on advertisements in certain locations justified***
- 3.1 Modification 126 to Policy LP28 requires a further modification to bring it in line with The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (as amended). The regulations on advertising are comprehensive and policies should outline general principles in terms of the Council's objectives in relation to amenity and public safety only, with any applications that need the express consent of the Council determined by Development Management case officers, applying the amended regulations and using the Communities and Local Government guidance. **Suggested modification:** make changes to the section on advertising in Policy LP28 as follows:

## **LP28: Advertising and Shop Fronts**

1. The Council will support signage in designated town centres and key retail parades that:

- a) Ensure that shopfronts and signs placed on buildings respect the overall character and appearance of the building and the street scene;
- b) Demonstrate in planning applications for advertisement consent in Conservation Areas, a respect for the local historic and architectural character. ~~Applications for advertisement consent in Conservation Areas that are not part of a town centre will be refused permission~~

~~Outside of these locations, advertisements will generally not be supported unless it can be demonstrated that they are necessary for the use of the premises on which they are located.~~

2. For proposals to be acceptable ~~in principle~~ the following requirements must be adhered to:

- a) Advertisements must respect the design of the building on which they are erected and the character and amenity of the surrounding area;
- b) The scale, colour, materials, ~~content~~, illumination and siting of an advertisement must be appropriate to their location;
- c) ~~Supporting~~ Fascia signs and projecting signs must respect the architectural and design features of the host building. ~~are must be of an appropriate height relative to overall height of the shop front, and not intrude above ground floor levels. Fascia and projecting signs should adhere to height stipulations referred to in the 'Outdoor advertisements and signs: a guide for advertisers' (DCLG 2007), guidance in order to benefit from deemed consent;~~
- d) Large poster hoardings must screen a vacant site, a temporary use or an unsightly building or feature. Their design, means of support and illumination (if provided) should not detract from the building, or site or character of the area.
- e) Small poster panels must:
  - i. ~~Relate to an existing building or its forecourt~~ and not detract from the appearance of a street;
  - ii. Be in proportionate to the site and surrounding area; and
  - iii. Not detract from the character and amenity of the surrounding area.

3. The Council will resist advertisements that:

- a) Obscure or are likely to be confused with traffic signs or signals; and
- b) Impede the visibility or distract the attention of drivers or pedestrians at any access road, junction or point where special care is needed.

All advertisements should be maintained in a condition that does not threaten public safety in any way.

**iv) What is the justification and the evidence for the imposition of detailed standards for amenity space in Policy LP29 and modification 128 (LBR 1.01.2)? Is modification 128 in accordance with the Mayor of London's Housing SPG? Paragraph 020 of the PPG on Housing: optional technical standards indicates that adopting the nationally described space standards should be justified in terms of need, viability and timing. In relation to internal space what evidence is there in this respect?**

- 4.1. The external space standards referenced in Policy LP29 and modification 128 have been developed in accordance with sections 2.2.9 (Communal and Public Open space) and 2.3.31-2.3.33 (Private Open Space) of the Mayor of London's Housing SPG. For flatted development, Policy LP29 seeks to reinforce Standard 26 of the SPG. For housing developments, in order to ensure that private open space is of a practical shape and utility, provision for outdoor gardens and communal amenity has been set through provision of a flexible local space standard.
- 4.2. Through the Redbridge Local Development Framework (2008) the Council sought provision of private amenity space and communal amenity space on the basis of a quantifiable standard based upon numbers of habitable rooms. Following implementation of the LDF (2008) and the pursuit of higher density development in accordance with the London Plan 2016, these standards were considered to be difficult to achieve in practice.
- 4.3. The Council has undertaken a benchmarking exercise with comparable boroughs, a key example being London Borough of Waltham Forest. The Council considers that the updated standard approach to meet minimum amounts of external amenity space as specified within modification 128 provides a more appropriate mechanism to secure such infrastructure and enable deliverability of individual sites. The provisions of part 2 of Policy LP29 provide additional flexibility to this approach where this can be justified.
- 4.4. In applying the nationally described space standards within Policy LP29, the Council has had due regard to the consideration of Paragraph 020 of the PPG Housing: optional technical standards. In regard to the need to adopt these standards, the Outer North East London Strategic Housing Market Assessment, September 2016, identifies a need to deliver a range of housing types throughout the borough. Therefore, application of the national standards is considered necessary to deliver homes which are of a size and type to meet this need.
- 4.5. Considering viability, the Local Plan Viability Assessment and Community Infrastructure Levy Review (May 2016) (LBR 2.11) considered the impact of the nationally described space standards upon the viability of the Local Plan and considered that these standards would not impact upon land supply or the provision of affordable housing. (Local Plan Viability Assessment and Community Infrastructure Levy Review updated as CED111 May 2017, includes 35% affordable housing target).

4.6. In terms of timing, the Council does not consider that a transitional period is required to adopt the national standards, given that new housing developments within the borough were previously subject to larger internal space requirements under the provisions of Policy 3.5 of the London Plan 2016. Given that the national standards require a lesser amount of internal space than the previous policy, the Council considers the national standards to enable of sites in a timely manner.

**v) In Policy LP30 is section 2 relating to prior approval applications justified and necessary given the provisions of the General Permitted Development Order?**

5.1 Section 2 of Policy LP30 was included as a means of informing the public of the Council's approach to the implementation of planning regulations relating to prior approval applications. The justification for including section 2 in the policy was to increase the efficiency of the process for prior approval applications by eliminating delays with individual cases as far as possible. However, it is accepted that as with permitted development for household alterations the regulations in the Town and Country Planning (General Permitted Development) (England) Order 2015 includes prior approval applications, and therefore section 2 of Policy 30 is not essential and can be removed. **Suggested modification:** delete section 2 of Policy LP30: Household Extensions:

***LP30: Household Extensions...***

~~...2 For single storey rear extensions of 3–6m depth for attached/terraced houses, and 4–8m depth for detached houses, the Council will refuse Prior Approval applications if:~~

- ~~a) Any part of the submission requirements for Prior Approval applications, as outlined on the Council's planning website, have not been satisfactorily met~~
- ~~b) Following submission of a Prior Approval application the proposed development does not meet with Class A of the Town & Country Planning (General Permitted Development) Order 2015~~
- ~~c) Following validation of the submitted Prior Approval application, further information regarding the proposed development requested by the Council is not submitted within 10 working day~~
- ~~d) Following the completion of neighbourhood consultation, further information regarding the proposed development requested by the Council is not submitted within 10 working days.~~

~~Such information as required for criteria c and d above may include site photography and details of matching materials.~~

~~Further to the above:~~

- ~~i. Any Prior Approval given will be subject to other requirements being met, for example Building Regulations and Party Wall agreements.~~
- ~~ii. The developer must notify the local authority of the completion of the development in writing, and submit photography of the property at pre-commencement and post-completion stages~~

~~iii. The proposed development must be completed on or before 30 May 2019.~~

**vi) What is the justification for the specific restrictions on basement development in Policy LP31 within criteria 2-5 and the requirement for a Basement Impact Assessment and Construction Management Plan?**

- 6.1 Basement development is a rising trend with planning applications increasing in London. Between 2016 and 2017, approximately 30 applications involving basement extensions and new basement development have been submitted. LP31 is a new policy formulated to tackle the specific planning issues, associated with basement developments.
- 6.2 The justification for the restrictions on basement development to only a single storey is that larger basement development can have an impact on water run-off, and the capacity of the garden to support plant life and trees, which is essential to maintaining the amenity of properties and local character. Larger basement development that extends to more than a single storey can also have an effect on neighbouring properties, with potential to damage neighbouring buildings.
- 6.3 It is considered that a basement development proposal covering the entire garden space of a property, at the rear and front garden, could not be acceptable, partly for the reasons outlined above at 6.1, with regard to water run-off and the garden's ability to support trees/plant life. The purpose of garden space for all properties is to contribute to the natural environment and biodiversity of the area, to encourage species migration, and in part to enhance local amenity and character - with no restriction on development this would be severely inhibited. A further factor is the effect larger schemes might have on ground water and ground stability, and the impact this will have on neighbouring properties.
- 6.4 Basement development should provide at least 1 metre depth of permeable soil above the building as a mitigation measure enabling water absorption from fresh planting schemes, replacing species lost through development and the subsequent reduction in a permeable surface. This measure also limits rain water run-off through water absorption. Sustainable urban drainage systems have been highlighted in Policy LP31 as they are a mitigating measure where development has reduced the area of permeable soil in the garden space.
- 6.5 The justification for the requirement of a Basement Impact Assessments (BIA) is that it will provide the Council with information that will enable it to decide if the proposal or any aspects of it will be harmful to the local built or natural environment, local character and/or amenity, or neighbouring properties. The BIA will inform the Council of the implications of proposals for basement developments, and allow decision makers to suggest mitigation measures against highlighted areas of risk. Basement Impact Assessments (BIA) should contain all the information

needed by the Council to reach a decision on the planning application it supports. However on reflection it is considered that the policy could be less restrictive in part, and changes should be made to its content.

**Suggested Modification:** make the following changes to Policy LP31: 'Basement Development'.

Combine criteria 2 and 3 of Policy LP31 in the following way:

**LP31: Basement Development...**

2. ~~Does not comprise of more than one storey~~ 3-Is not built or be under an existing basement, subject to the findings of a Basement Impact Assessment (BIA):

Make changes to criterion 9 of Policy LP31 in the following way:

9 ~~Includes a Basement Impact Assessment (BIA), appropriate to the scale of the proposal that carries out assesses geotechnical structural engineering and hydrological investigations impacts. The assessment should also include modelling to ensure that basement developments will not harm the local environment and local amenity.~~

- 6.6 It is also suggested to delete the final paragraph of LP31 as Construction Management Plans (CMP) will be addressed by means of planning conditions on individual applications. The final sentence of the paragraph duplicates criteria 8 of the Policy and needs to be deleted.

Delete the last paragraph of Policy LP31 as follows:

~~The Council will also require Construction Management Plans for all basement development. Basement development or extensions that include habitable rooms and other sensitive uses in areas prone to flooding will be refused planning permission.~~

Change policy criteria to be listed in alphabetical format.

- vii) **What is the justification for the thresholds for the submission of a Sustainable Statement in criteria 3(e) of Policy LP32 regarding sustainable design and construction? Having regard to paragraphs 013-017 of the PPG on Housing: optional technical standards what is the clear local need for modification 132 (LBR 1.01.2)? In any event, why is the water consumption figure of 105 litres/person/day used rather than the optional Building Regulation requirement for water use of 110 litres/person/day?**

- 7.1 The thresholds for the submission of a Sustainable Statement contained within criteria 3(e) Policy LP32 'Sustainable Design and Construction' relate to the Council's own requirements for refurbishments, which have now been superseded. National validation lists no longer require sustainable statements for new development as this information is now contained within design and access statements and any necessary

Environmental Impact Assessments (EIAs) submitted with planning applications for major development schemes. Criteria 3(e) can be deleted from the policy. **Suggested modification:** delete criteria 3(e) from Policy LP32 'Sustainable Design and Construction'.

**LP32: Sustainable Design and Construction...**

~~... (e) submitting a Sustainable Statement including the above measures for the development of 5 or more residential units, or 500m<sup>2</sup> or more of additional floorspace.~~

7.2 Paragraphs 013-017 of the PPG on Housing: optional technical standards, set out a mandatory national standard of 125 litres/person/day, but states that where there is a clear local need, local plan policies can require tighter standards of 110 litres per day.

7.3 The Environment Agency Water Stressed Areas Classification 2013 ([https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/244333/water-stressed-classification-2013.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/244333/water-stressed-classification-2013.pdf)) is cited within the PPG as a primary source of evidence for supporting a tighter water efficiency standard. As the borough is covered by Thames Water and Essex and Suffolk Water, this demonstrates at page 7 that the entire borough is within areas of serious water stress. Furthermore, paragraph 5.61 of the London Plan also sets out that "all water companies that serve London are located in areas classified as seriously water stressed" and that "the optional requirement should be applied across London". This therefore justifies the use of the optional Building Regulation requirement of 110 litres/person/day.

7.4 Modification 132 as set out in LBR1.01.2 is consistent with London Plan Policy 5.5. wording of "mains water consumption of 105 litres"... "excluding an allowance of 5 litres per head per day for external water consumption". However, to avoid confusion it is suggested that modification 132 is further amended to read as follows:

*"minimising water consumption in accordance with the London Plan by incorporating water saving measures and equipment into new developments, and designing residential development so that mains water consumption does not exceed 110~~05~~ litres per head per day."*

**viii) The Written Ministerial Statement of March 2015 makes clear that no additional local technical standards should be set for new dwellings. In relation to modification 133 (LBR 1.01.2) to Policy LP32 as BREEAM is a technical standard it should not be applied to new housing including domestic refurbishment. Therefore should 4(a) be deleted as inconsistent with national policy? What is the rationale for seeking Excellent ratings for non-domestic buildings and why does the water efficiency category need strengthening?**

8.1 It is acknowledged that the application of BREEAM standards to domestic refurbishment schemes would represent a technical standard contrary to the advice in the Written Ministerial Statement of March 2015, and as

such it should be deleted. Modification 133 from LBR1.01.2 should therefore be further amended to read as follows:

~~"(a) For existing development involving more than one dwelling, or where one or more dwellings are created:~~

~~• Supporting domestic refurbishments (alterations and extensions to existing dwellings, and conversions and change of use projects to residential use), where the development achieves an 'Excellent' rating against the BREEAM Domestic Refurbishment scheme. Seeking the achievement of BREEAM 'Excellent' ratings, including specifically within the water efficiency category, where viable on:~~

- ~~• The refurbishment of non-domestic buildings~~
- ~~• New non-domestic buildings over 1000m<sup>2</sup> in size~~
- ~~• Extensions to non-domestic buildings where the proposed extension is equal to or greater than 50% of the existing building floorspace".~~

~~(b) For existing non-residential development, where the resultant development (including any proposed extension) is over 1,000sqm in floorspace, and if an extension is proposed that is equal to or greater than 50% of the existing building floorspace: supporting refurbishments and/or extensions to non-domestic buildings where the development achieves an 'Excellent' rating against the BREEAM Non-Domestic Refurbishment scheme (or other more appropriate BREEAM scheme); and~~

8.2 In terms of BREEAM Excellent ratings, these have been sought in Redbridge since the adoption of the Sustainable Design and Construction SPD in January 2012, in order to encourage best practice in responding to climate change. Since this was introduced, there is limited evidence of approved schemes achieving this standard, and several schemes have demonstrated that only BREEAM "Very Good" standard was achievable. Nevertheless the London Plan provides a steer at Policy 5.3 that "the highest standards of sustainable design and construction should be achieved in London to improve the environmental performance of new developments and to adapt to the effects of climate change over their lifetime." It is recognised that the standard referred to in Policy LP32 of the Local Plan is aspirational, hence the use of the terminology "seeking".

8.3 Specific references to the water efficiency category was included in response to Environment Agency concerns that schemes can sometimes achieve an overall "Excellent" rating despite performing poorly in the water efficiency category. It was therefore included on the basis of the entire borough being in a water stress area, as referred to in response to question (vii) above. In addition, as set out in table 1.1 of the GLAs Sustainable Design and Construction SPG, it is a Mayoral priority that "new non-residential developments achieve the maximum number of water credits in a BREEAM assessment".

**ix) With regard to paragraphs 005-012 of the PPG on Housing: optional technical standards, are the requirements in criterion 4(c) of Policy LP32 regarding accessibility justified?**

9.1 Paragraphs 005-012 of the PPG states that in line with the NPPF ‘...Local Planning Authorities should take account of evidence that demonstrates a clear need for housing for people with specific housing needs and plan to meet this need...’ and that they should ‘...rely predominantly on secondary data (e.g. Census, national surveys) to inform their assessment.’...’Based on their housing needs assessment and other available datasets it will be for local planning authorities to set out how they intend to approach demonstrating the need for Requirement M4(2) (accessible and adaptable dwellings), and/or M4(3) (wheelchair user dwellings), in Building Regulations.’

9.2 The requirements in criterion 4(c) of Policy LP32 ‘Sustainable Design and Construction’ are supported by the housing needs assessment for Redbridge in the Outer North East London Strategic Housing Market Assessment (SHMA) 2016 (LBR 2.01). Pages 15 and 16 discusses specific housing needs, and in reference to Building Regulations Approved Document M (2015) categories 2 and 3, it states at paragraph 28:

*‘Overall, in terms of the need for adapted or wheelchair adapted dwellings for households with specific needs, the evidence supports:*

- *The need for all dwellings to meet Category 2 requirements, providing that this does not compromise viability.*
- *The need for 10% of market housing and 15% of affordable housing to meet Category 3 requirements.’*

9.3 Considering these findings in the SHMA (LBR 2.01), the Council has reflected the requirements in Policy 3.8 ‘Housing Choice’ of the Mayor’s London Plan (2016) in criterion 4(c) in Local Plan Policy LP32, as they are considered to adequately meet the need for adapted or wheelchair adapted dwellings outlined in the SHMA (LBR 2.01).

**x) In Policy LP33 on heritage should criterion (d) include reference to weighing against any public benefits to be consistent with national policy in the NPPF?**

10.1 Paragraph 133 of the NPPF is already referenced within this criterion of Policy LP33, however the Council would support the modification of the policy to be clearer that it would refuse applications, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss of designated heritage assets, in accordance with the policy tests of Paragraph 133 of the NPPF. **Suggested modification:** add text referring to paragraph 133 in the NPPF.

Make changes to criteria (d) Policy LP33 ‘Heritage’, in the following manner:

*(d) Resisting development that does not preserve or enhance the character of designated heritage assets and refusing planning permission for development proposals that will result in harm to or the loss of the significance of a designated heritage asset, unless the developer can demonstrate that the proposal achieves an overriding*

*community benefit that outweighs any harm to or loss of the heritage asset in accordance with the criterion of paragraph 133 of the NPPF. (The Council will observe criteria set out in paragraphs 131-134 of the NPPF when considering development proposals);*

**xi) Does the Local Plan make sufficient provision for inclusive design and accessible environments in accordance with paragraphs 57, 58, 61 and 69 of the NPPF?**

- 11.1 In line with paragraph 57 of the National Planning Policy Framework (NPPF) Local Plan Policy LP26 'Promoting High Quality Design' contains criteria promoting high quality urban design that contributes to its context and location, and good design for individual buildings that incorporates accessible design features that are adaptable to different activities and the changing needs of everyone, including disabled and older people (LP26, criterion (e)).
- 11.2 Policy LP32 'Sustainable Design and Construction' contains criterion 4(c) which incorporates Building Regulations M4(2) and M4(3) regarding Accessible and Adaptable and Wheelchair User dwellings for new build housing, responding directly to access and inclusive design. The policy discusses the creation of high quality design throughout, with regard to architecture, urban and landscape design and materials that integrate with and respond positively to local character.
- 11.3 In terms of responding to paragraphs 58 and 61 of the NPPF, again Policy LP26 contains criteria regarding the creation of well functioning development; promoting high quality architectural and urban and landscape design that integrates well with existing development; creating recognisable routes that improve legibility; promoting energy efficiency; creating clear and distinct public and private spaces; and providing appropriate facilities for refuse and recycling.
- 11.4 The policy also requires development to respect the local character of the area, and preserve its special character in relation to heritage; to reinforce the positive, distinctive local identity of areas, as described in the Redbridge Urban Characterisation Study (2014, LBR 2.75.1, 2.75.2 and 2.75.3); and minimise crime and create safe and secure environments. Policy LP33 Heritage more explicitly promotes development that respects and integrates with the historic environment, protecting historic buildings and their settings, which includes natural environments such as historic parks and gardens.
- 11.5 In response to paragraph 69 in the NPPF, Local Plan Policy LP18 'Health and Well-Being', promotes strong, vibrant, healthy communities, with a high quality environment and development, to contribute to the creation of active, safe and accessible places, with access to healthcare services, social and cultural facilities, open space and nature, and measures to reduce crime and improve community safety. Proposals for major development schemes are required to include Health Impact Assessments (HIA). The supporting text of the policy outlines an integrated approach within the Local Plan to promote health and well-being, measures for

housing quality, access to healthcare services and other infrastructure, access to open space and nature, crime reduction and community safety etc.

- 11.6 Collectively policies in the Local Plan make provision for issues relating to inclusive design and accessible environments in accordance with the NPPF, although specific and explicit references to 'access and inclusive design' should be included. **Suggested modification:** incorporate text in the Local Plan specifically related to access and inclusive design.

Make the following changes to the first paragraph to Policy LP26:

***LP26: Promoting High Quality Design***

*The Council will require good design and 'place making', and will seek high quality design in all development within the borough. Innovative and good design will be encouraged and promoted, and development of poor design, that does not improve the character and quality of the area and the way the area functions, will be refused planning permission. The Council will expect developers to show how their proposals will achieve high quality inclusive design to ensure an accessible environment, and how they have engaged with users in their Design and Access Statements. The Council will promote high quality design in the borough by requiring that development:*

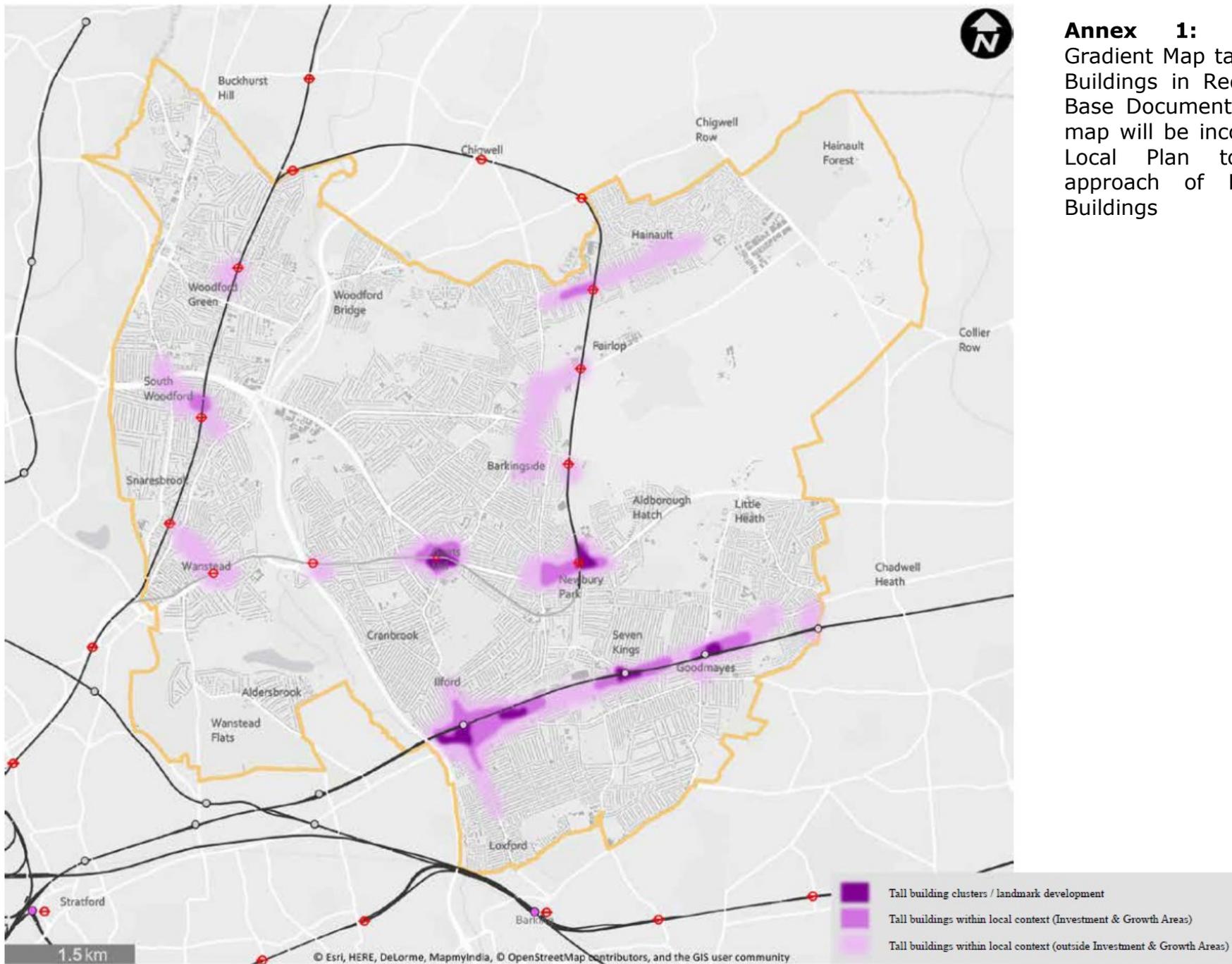
Make the following changes to Policy LP26 criterion (e):

- (e) *Incorporates sustainable design and durable construction, observing best practice in energy efficiency and climate change mitigation, and is incorporates the highest standards of accessible and inclusive design that is ~~and~~ adaptable to different activities and land uses and the changing needs of all, including disabled and older people;*

Add the following to the supporting text of Policy LP26, after paragraph 5.1.14:

Access and Inclusive Design

5.1.15 Inclusive Design ensures that the needs of all people are considered at an early stage and incorporated into development proposals from the outset. The aim is to achieve the highest standards of accessible and inclusive design in all new development schemes, and ensure that the built environment is safe, convenient and accessible to everyone, including disabled and vulnerable groups. All new development in the borough should achieve the highest standards of accessible and inclusive design. The Council will assess all new development proposals considering the Mayor's London Plan Policy 7.2 'An Inclusive Environment', alongside other design policies in the Local Plan.



**Annex 1:** Building Height Gradient Map taken from The Tall Buildings in Redbridge: Evidence Base Document (LBR 2.77). This map will be incorporated into the Local Plan to illustrate the approach of Policy LP27 Tall Buildings