

**Schedule of Proposed Main Modifications to Redbridge Local Plan**

**Consultation: 16<sup>th</sup> October – 27<sup>th</sup> November 2017**

***The Schedule includes modifications that arose through Regulation 19 consultation, Statements of Common Ground and discussions during the hearing sessions.***

All Local Plan shown in *italics*.

Deletions shown as ~~strikethrough~~

Additions shown as underline

## Main Modifications (MM)

Modification Number	Page	Para/ Policy/ Section	Detail of Modification	Source/ Reason of Modification
MM1	16	Vision, paragraph 2	<p>Delete site references as follows:</p> <p>Residents will share in the social and community infrastructure, access to a range of housing types, new schools at Oakfield and Goodmayes, improved health and wellbeing....</p>	In response to Inspector's Post Hearing Advice Part 2 (IED012).
MM2	20	Policy LP1	<p>Insert new criteria into Policy LP1 as follows:</p> <p><i>1. The Council will promote growth to deliver the Council's vision by directing new development including new homes, shops, <u>businesses</u>, leisure facilities and infrastructure to:</i></p> <p><i>(a) The borough's Investment and Growth Areas of:</i></p> <p><i>i. Ilford;</i></p> <p><i>ii. Crossrail Corridor;</i></p> <p><i>iii. Grants Hill;</i></p> <p><i>iv. South Woodford; and</i></p> <p><i>v. Barkingside.</i></p> <p><i>(b) The borough's main town centres, with proposed development compatible with their character, function and scale; and</i></p> <p><i>(c) Other identified Opportunity Sites (set out in Appendix 1) outside of Investment and Growth Areas and town centres, with proposed development protecting and enhancing the existing neighbourhood character of the surrounding area.</i></p>	In response to discussions arising from Day 2 of the hearing sessions

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			<p>2. <u>Subject to meeting all other relevant policies within the Local Plan, the Council will consider favourably development proposals on Opportunity Sites (set out in Appendix 1) which deliver the proposed use or mix of uses identified for each Site within Appendix 1. Development proposals for Opportunity Sites should seek to deliver the indicative quantum of new homes and other non-residential floorspace, and deliver the social infrastructure, set out for each Site in Appendix 1.</u></p>	
MM3	21	Para 3.2.4	<p>Amend the last sentence of paragraph 3.2.4, and insert additional text as follows:</p> <p><u>“Development within Investment and Growth Areas, but which fall outside of designated town centres should respond to the character and context of surrounding areas, including without limitation, respecting and enhancing the character of the established residential neighbourhoods, and the character of designated heritage assets. New development should also conserve and enhance the character and setting of conservation areas and heritage assets within Investment and Growth Areas, as part of a balanced approach towards growth and the preservation of the borough’s historic character.”</u></p>	In response to R01218/06 and R01218/03
MM4	21	Para 3.2.5	<p>Insert additional paragraph 3.2.5:</p> <p><u>“Within Appendix 1 to the Plan a quantum is given for new homes and other non-residential floorspace to be delivered on each of the Opportunity Sites. Development on each Opportunity Site should seek to deliver this indicative quantum of development. Any development on Opportunity Sites will be required to secure the highest quality in terms of design, in accordance with the policies of this plan, and be</u></p>	In response to discussions arising from Day 2 of the hearing sessions

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			<u>appropriate to its setting.</u>	
MM5	22/ 24/ 25	Policy LP1A and Paras 3.3.5 - 3.3.7	<p>Update contents of policy box LP1A as follows:</p> <p><b><i>"New homes – <del>6,000</del> 5,300</i></b>  <b><i>New (gross) retail floorspace – <del>15,000</del> 30,000 sq.m</i></b>  <b><i>New (gross) employment floorspace – <del>20,000</del> 19,000 sq.m</i></b>  <b><i>New jobs – <del>2,000</del> 3,000</i></b></p> <p><b><i><u>Key Infrastructure – Education and health infrastructure (Appendix 2) education facilities (Appendix 1) and health infrastructure including Investment in Loxford Polyclinic (Appendix 2) Education (including two new primary schools and primary and secondary school expansions) and health (improvements to Loxford Polyclinic and a new health hub in Ilford Town Centre), delivery of a new Cultural Quarter in Ilford Town Centre including civic, leisure and retail uses."</u></i></b></p> <p>Amend first sentence of 3.3.5 to read:</p> <p><b><i>"Ilford has an important role to play in meeting housing need in the borough. A number of key Opportunity Sites (Appendix 1) are located within the Investment and Growth Area which provides the opportunity to build approximately <del>6,000</del> 5,300 new high quality homes across the full range of private and affordable housing sectors (Policies LP2, LP3 and LP5)."</i></b></p>	In response to R01213/02 (for consistency with policies LP9 and LP14, and site development capacities included in Appendix 1) and Council clarification reflecting updated Infrastructure Delivery Plan (2017) and discussions during Day 8 of the hearing sessions.

Modification Number	Page	Para/ Policy/ Section	Detail of Modification	Source/ Reason of Modification
			<p>Update paragraph 3.3.6 to read:</p> <p><i>“The creation of a strong, efficient local economy, providing a diverse range of commercial uses and delivering over <del>2,000</del> <u>3,000</u> new jobs that are accessible to local residents is key to regenerating Ilford (Policy LP14, 15, 16). The town centre has the capacity to provide approximately <del>20,000</del> <u>19,000</u> sq.m of new employment space <del>office and commercial floorspace</del>. This will further diversify the range of uses and jobs in the town centre broadening its appeal. The need to harness growth to create jobs has additional importance, because the wards in and to the south of the town centre are among the 20% most deprived in London. New modern purpose <u>employment</u> <del>built commercial and office</del> space will be provided in <u>the</u> mixed use redevelopment of vacant and underused low grade office accommodation to provide for new flexible office/studio space which will further support local business and enhance job growth.”</i></p> <p>Update 2<sup>nd</sup> sentence of paragraph 3.3.7 to read:</p> <p><i>“Ilford has the potential to accommodate approximately <del>15,000</del> <u>30,000</u> sq.m of <u>new</u> retail floorspace”</i></p>	
MM6	26/ 27/ 29	Policy LP1B and Paras 3.4.7 and 3.4.10 - 3.4.11	<p>Update content of policy box LP1B as follows:</p> <p><b><i>“New homes <del>4,700</del> <u>4,850</u></i></b>  <b><i>New (gross) retail floorspace – <del>15,000</del> <u>20,000</u> sq.m</i></b>  <b><i>New (gross) employment floorspace – <del>20,000</del> <u>7,300</u> sq.m</i></b>  <b><i>New Jobs – <del>2,000</del> <u>1,600</u></i></b></p> <p><b><i>Key infrastructure - Crossrail - Seven Kings, Goodmayes and Chadwell Heath Station</i></b></p>	In response to R01213/02 (for consistency with policies LP9 and LP14, and site development capacities included in Appendix 1) and Council clarification reflecting updated Infrastructure

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			<p><i>Improvements - Public realm improvements – <del>Two</del> <u>3</u> new minimum 8 form <u>of</u> entry secondary schools and one new primary school - Health <u>infrastructure including investment in Newbury Park Health Centre -clinic- and two new health hubs (See Appendix 2) - Installation of a Decentralised Energy Network – Improvement to Seven Kings Park and Goodmayes Park Extension and –loss of playing fields resulting from proposed development will be replaced by equivalent or better provision in terms of quantity and quality in a suitable location-</u> Improved cycling infrastructure.”</i></p> <p>Amend paragraph 3.4.7 as follows:</p> <p><i>“There are a number of key Opportunity Sites (Appendix 1) located within the Crossrail Corridor which provide the opportunity to build approximately <del>4,700</del> <u>4, 850</u> high quality new homes (Policies LP2, LP3 and LP5). The Council has identified <del>three</del> <u>two</u> strategic sites to the north of the Corridor that are capable of accommodating housing led mixed use development during the plan period. These are:</i></p> <ul style="list-style-type: none"> <li><i>• <del>Land in and around</del> King George and Goodmayes Hospitals; <u>and</u></i></li> <li><i>• <del>The Ford Sports</del> Ground; and</i></li> <li><i>• Land at Billet Road.</i></li> </ul> <p>Amend 3.4.10 and 3.4.11 to read:</p> <p><i>“Crossrail will act as a catalyst for economic growth attracting <u>both residential growth and supporting</u> new businesses looking for a location with excellent transport links (Policy LP14). The Corridor has the capacity to provide approximately <del>20,000</del></i></p>	<p>Delivery Plan (2017).</p> <p>In response Inspector’s Post Hearing Advice Part 2 (IED012).</p>

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			<p><del>7,300 sq.m of new <u>employment office and commercial</u> floorspace and 20,000 sq.m of new retail space alongside new residential development and supporting infrastructure. This will help further diversify the range of uses and jobs in the Corridor broadening its appeal; New modern purpose built commercial and office space will be provided through the redevelopment of vacant and underused low grade office accommodation to provide new flexible office/ studio space as part of mixed use development, further supporting local business and enhancing job growth. Making Seven Kings, Goodmayes and Chadwell Heath more vibrant and attractive places, with an improved commercial and retail offer, new high quality buildings, and new public spaces that will enhance the Corridor (Policy LP14). The Crossrail Corridor has the opportunity to provide approximately 15,000 sq.m of retail floorspace."</del></p>	
MM7	28	King George and Goodmayes Hospitals Policy box	<p>Amend policy title and bullet points to read:</p> <p><b><u>LP1Ba King George and Goodmayes Hospitals</u></b></p> <p><i>The Council expects a comprehensive housing led mixed use development at King George and Goodmayes Hospitals in accordance with the following criteria:</i></p> <ul style="list-style-type: none"> <li>• <i>Land in and around King George and Goodmayes Hospitals will be developed to provide around 500 high quality new homes (including affordable <u>and family housing</u>);</i></li> <li>• <del>Maximising</del> <i>Optimising densities compatible with local context, sustainable design principles and public transport capacity, in line with the Density Matrix of the London Plan;</i></li> <li>• <i><u>The conversion and reuse of non-designated historic assets will enable provision of new homes. This will include conversion of the former mental</u></i></li> </ul>	In response to R01087/03, R01087/06, R01087/10, R01090/08, R01258/02, updates made through Statement of Common Ground with NELFT and BHRUT (CED025), and Council clarification and consistency

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			<p><u>health asylum buildings;</u></p> <ul style="list-style-type: none"> <li>• <del>On site provision for a new primary and secondary school;</del></li> <li>• <u>Delivery of a new health hub;</u></li> <li>• <i>A permeable design – a walkable neighbourhood with routes and spaces defined by buildings and landscape;</i></li> <li>• <u>Enhanced open space provision, including the protection and enhancement of land designated as a Site of Importance for Nature Conservation</u></li> <li>• <i>Improved east-west pedestrian and cycle routes to link the new neighbourhoods together;</i></li> <li>• <i>Development to be of the highest quality design, respecting the nature and character of the area;</i></li> <li>• <i>At Goodmayes development should maximise the opportunity to create a centerpiece for the new neighbourhood with opportunities to enhance the setting of the former mental health asylum;</i></li> <li>• <i>The provision for decentralised energy networks, subject to <del>feasibility</del> <u>technical feasibility and viability</u>. Any provision that is secured on this site must comply with policy LP29 in order to limit impacts on residential amenity;</i></li> <li>• <i>Development of this site should also comply with all other relevant policy requirements of this plan; and</i></li> <li>• <i><u>The phased development of land in separate ownership</u> <del>Development of this site should be considered in the context of a Planning Brief/ Masterplan for the site as a whole”.</del></i></li> </ul>	
MM8	28	The Ford Sports Ground Policy box	<p>Delete policy box as follows:</p> <p><del>The Council expects a comprehensive housing led mixed use development at the Ford</del></p>	In response to Inspector’s Post Hearing Advice Part 2 (IED012).



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			<p><del><i>Sports Ground:</i></del></p> <p><del><i>Land at the Ford Sports Ground will be developed to provide around 850 high quality new homes, in line with the Density Matrix of the London Plan;</i></del></p> <p><del><i>Re-provision of existing playing pitches;</i></del></p> <p><del><i>Ensure the appropriate levels of open space provision;</i></del></p> <p><del><i>The creation of a new green neighbourhood of good quality homes linked by well landscaped space; with good access to sports, recreation, education and community/health facilities; and</i></del></p> <p><del><i>Existing neighbourhoods may be extended into the site and linked to form a cohesive whole.</i></del></p> <p><del><i>Further detail and guidance in relation to detailed design and concept masterplanning will be set out in a Planning Brief/Masterplan.</i></del></p>	
MM9	29	Land at Billet Road Policy box	<p>Amend policy name and introductory sentence to read:</p> <p><b><u>LP1Bc Land at Billet Road</u></b></p> <p><i>“Land at Billet Road will be developed to provide around <del>1100</del> <u>800</u> high quality new homes <u>(including affordable and family housing)</u> in accordance with the following criteria:</i></p>	In response to R01087/06 and R01258/02, and for consistency with the recommendations of the Open Spaces Study, proposed modifications to Appendix 1 and Council

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			<p>Amend first bullet point, and add additional subsequent bullet points to read:</p> <ul style="list-style-type: none"> <li>• <i><del>“Maximising</del> <u>Optimising</u> densities compatible with local context, sustainable design principles and public transport capacity, in line with the Density Matrix of the London Plan;</i></li> <li>• <i><u>Enhanced open space provision</u></i></li> <li>• <i><u>On site provision of a new secondary school”</u></i></li> </ul>	clarification and consistency
MM10	30	Policy LP1C and Para 3.5.6	<p>Update content of policy box LP1C as follows:</p> <p><b><i>“New Homes – 500</i></b>  <b><i>New (<u>gross</u>) retail floorspace – <del>5,000</del> <u>8,000</u> sq.m</i></b>  <b><i>New (<u>gross</u>) employment floorspace – <del>10,000</del> <u>2,600</u> sq.m</i></b>  <b><i>New Jobs – <del>500</del> <u>600</u>”</i></b></p> <p>Update penultimate sentence in paragraph 3.5.6 to read:</p> <p><b><i>“The town centre has the capacity to provide approximately <del>10,000</del> <u>8,000</u> sq.m of new retail floorspace (Policy LP9). <u>As reflected in Policy LP17 the Council will support growth with appropriate community infrastructure for mixed use development, supporting the expansion of facilities for schools and healthcare, and revisiting the loss of existing facilities”</u></i></b></p>	<p>In response to R01213/02 and R01213/12 - for consistency with policies LP9 and LP14, and site development capacities included in Appendix 1.</p> <p>Updated to reflect discussions during Day 8 of the hearing sessions.</p>
MM11	32	Policy LP1D	Update text in policy box LP1D to read as follows:	In response to R01213/02 and R01206 - for

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			<p><b><i><u>“New homes – <del>650</del> 430</u></i></b>  <b><i><u>New (gross) retail floorspace – <del>2,000</del> 3,500 sq.m</u></i></b>  <b><i><u>New (gross) employment floorspace – <del>5,000</del> 6,100 sq.m</u></i></b>  <b><i><u>New Jobs – <del>100</del> 600</u></i></b></p> <p><b><i><u>Key infrastructure/Projects – High Street and public realm improvements – Education including planned school expansions and Health infrastructure including investment in South Woodford Health Centre and redevelopment of Wanstead Hospital as a locality hub (Appendix 2) – Improved cycling infrastructure – Preserve and enhance the George Lane and South Woodford Conservation Areas. As reflected in Policy LP17 the Council will support growth with appropriate community infrastructure for mixed use development, supporting the expansion of facilities for schools and healthcare, and revisiting the loss of existing facilities”</u></i></b></p>	<p>consistency with policies LP9 and LP14, site development capacities included in Appendix 1, and updated Infrastructure Delivery Plan (2017)</p> <p>In response to R01206/07 and Council clarification reflecting updated Infrastructure Delivery Plan (2017).</p>
MM12	32	Para 3.6.4	<p>Amend paragraph 3.6.4 to read as follows:</p> <p><b><i><u>“The designation of South Woodford as an Investment and Growth Area will ensure a strategy for growth that protects and boosts local business and commercial activity through new mixed use development, strengthening it economically, as well as delivering additional homes. The strategy for growth in South Woodford Investment Area is based on the concept of allowing for the intensification of development in town centres along transport corridors. The town centre is well served by public transport such as South Woodford Underground Station on the Central Line (Policies LP2, LP3 and LP6). The purpose of the designation of South Woodford as an Investment and Growth Area is to implement a strategy for growth that boosts local business and commercial activity through new mixed use development, as well</u></i></b></p>	<p>In response to R00416/02 and R01203/01</p>

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			<p><u>delivering additional homes in the area. The objective is to increase footfall in South Woodford Centre and create jobs, strengthening it economically. Opportunities have been identified where improvements can take place, but the Council also recognises the special character of South Woodford and the centre, and preserving that character is also a key aim of the strategy for the Investment and Growth Area. The designation is about positive economic and physical improvement, so that the area only gains economically and environmentally and does not lose any of the features that make it special. This approach involves a balanced approach to development and the preservation of local heritage assets and their settings, and new buildings will be required to respect local character and make a positive contribution to the area."</u></p>	
MM13	32	Para 3.6.5	<p>Amend paragraph 3.6.5 to read:</p> <p><i>"Although South Woodford is largely residential in nature there are still opportunities to accommodate new homes and jobs. Key sites include Station Estate and 53-55 Marlborough Road (Appendix 1). The Opportunity Sites within the Investment and Growth Area have the potential to provide approximately <del>651</del> <u>430</u> new homes. The Council will seek to <del>create a contemporary landmark within the town centre at Station Estate. This building should be sympathetically designed to</del> <u>deliver high quality developments on these Opportunity Sites that respect the local character of the surrounding area (Policies LP26, 27 and 33)."</u></i></p>	<p>In response to R00416/10, R00108/14, and R01203/14, and for consistency with modifications proposed to Appendix 1</p>

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MM14	32	Para 3.6.6	<p>Amend paragraph 3.6.6 to read:</p> <p><i>“Key <del>business and industrial and business</del> locations of the <u>Southend Road Business Park, Ravens Road, and the Shrubberies and Woodford Trading Estate</u> are imperative to the economic <del>success development</del> of the borough as they are the locations of some of the borough’s <u>better quality employment stock</u> <del>largest and most successful businesses</del>. The Council will seek to protect and enhance these locations and further promote them as locations for new business in the borough (Policy LP14). The <u>Investment and Growth Area town-centre</u> has the capacity to provide approximately <u>5000-6,100 sq.m of new business space as part of mixed use developments</u> <del>and commercial floorspace.</del>”</i></p>	Council – for consistency with proposed modifications to LP14 and Appendix 1
MM15	34	Policy LP1E	<p>Update text in policy box LP1E to read as follows:</p> <p><i>“<del>New homes – 1,400</del> <u>500</u>  <b>New (gross) retail floorspace – 5,000-2,000 sq.m</b>  <b><del>New employment floorspace – 5,000 sq.m</del></b>  <b><del>New Jobs – 200</del> <u>125</u></b></i></p> <p><i><b>Key infrastructure</b> - High Street and public realm improvements – <del>New minimum 8 form entry all through secondary school at Oakfield</del> – Improved Redbridge Sports Centre - Improved cycling infrastructure and pedestrian links to Fairlop Waters and Hainault Forest Country Park – Improvements to Fullwell Cross Library, Fullwell Cross Leisure Centre and Barkingside Recreation Ground. <u>Redevelopment and modernisation of Fullwell Cross Health Centre.</u> <del>provision of a new Locality Hub as part of the proposed redevelopment of Oakfield. The loss of playing fields resulting from proposed development will be replaced by equivalent or better provision in</del></i></p>	In response to Inspector’s Post Hearing Advice Part 2 (IED012).

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			<del>terms of quantity and quality in a suitable location. Supporting facilities will also be re provided"</del>	
MM16	35	Paragraphs 3.7.4	<p>Amend paragraph 3.7.4 as follows:</p> <p><i>Barkingside has a number of key sites that have the potential to provide new mixed use developments, which will enhance the vitality and prosperity required to improve the area (Policies LP1, LP2 and LP3). The Investment and Growth Area includes a number of Opportunity Sites (see Appendix 1). <del>Most notable is Oakfield at the northern end of the area which includes Redbridge Sports and Leisure Centre. This site offers a unique and significant opportunity to define the area by delivering a high quality, modern mixed use development. The site benefits from excellent proximity to Fairlop Station, the town centre and the existing open spaces. The existing leisure centre is an important local facility and redevelopment offers the potential to improve and enhance it to create a sub regionally important facility. Given the existing context of the area there is the potential for a development with a variety of character tied together by 'strong landscaping'. Further details to how the Council will see this site come forward will be subject to a masterplanning exercise responding to the existing character and urban grain, ensuring new places and neighbourhoods retain their local distinctiveness.</del></i></p>	In response to Inspector's Post Hearing Advice Part 2 (IED012).
MM17	36	Oakfield Policy box and paragraph 3.7.5	<p>Delete policy box and paragraph 3.7.5 as follows:</p> <p><del>The Council's aspirations for development at Oakfield are set out below:</del></p> <p><b>Oakfield</b></p> <p><del>The Council expects a comprehensive housing led mixed use development at Oakfield</del></p>	In response to Inspector's Post Hearing Advice Part 2 (IED012).

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			<p><del>in accordance with the following criteria;</del></p> <p><del>Land at Oakfield will be developed to provide around 600 high quality new homes (including affordable and family housing);</del></p> <p><del>Development will maximise densities compatible with local context, sustainable design principles and public transport capacity, in line with the Density Matrix of the London Plan;</del></p> <p><del>Development should be of the highest quality design, respecting the nature and character of the area, reflecting the surrounding Green Belt;</del></p> <p><del>Provision should be made for a new school;</del></p> <p><del>Upgrade sporting provision at Redbridge Sports Centre to transform it into a major regional sports hub;</del></p>	

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			<p><del>Enhanced open space provision;</del></p> <p><del>Re-provision of existing playing pitches;</del></p> <p><del>Comply with all other relevant policy requirements of this plan; and</del></p> <p><del>Development of this site should be considered in the context of a Masterplan for the site as a whole.</del></p>	
MM18	37	Policy LP2	<p>Amend Policy LP2 criteria (b) to read:</p> <p><i><u>“(b) Promoting and considering in a positive manner residential development which comes forward on designated Opportunity Sites (as identified in Appendix 1) , as part of a mix of uses (where so provided within Appendix 1). Subject to other relevant policies within the Local Plan and site specific considerations residential development on Opportunity Sites should seek to deliver the indicative quantum of new homes identified for each Site in Appendix 1.”</u></i></p> <p>Insert new criteria (f) to read:</p> <p><i><u>“Supporting infill development on previously developed land, subject to the criteria set out in polices LP7 and LP26”</u></i></p>	In response to R00204/02, and discussions arising from Day 2 of the hearing sessions



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MM19	38	Para 3.8.4 and 3.8.5	<p>Amend final sentence of paragraph 3.8.4 and 3.8.5 to state:</p> <p><i>“The Council has undertaken an exhaustive search for potential housing sites in the borough. The Strategic Housing Land Availability Assessment (SHLAA) (2013), undertaken by the Mayor, plus additional sites identified by the Council (see Appendix 1) has established that the borough has the capacity to accommodate up to <del>18,474</del> <u>17,237</u> new homes (including windfall).”</i></p> <p><i><del>The Mayor’s SHLAA (2013) has considered the potential housing capacity of Oakfield in Barkingside Investment and Growth Area and land in and around the King George and Goodmayes Hospitals in the Crossrail Investment and Growth Area. In accordance with the London Plan (2016), this demonstrates that the borough has sufficient capacity to meet and exceed its minimum housing target whilst also closing the gap to its objectively assessed housing need.</del></i></p>	Council – for consistency with proposed modifications to Appendix 1 and the Inspector’s Post Hearing Advice Part 2 (IED012).
MM20	38	Table 3	Update as shown in document CED017	Council – for consistency with proposed modifications to Appendix 1 and the Inspector’s Post Hearing Advice Part 2 (IED012).
MM21	39	Figure 12	Update as shown in document CED053	In response to Council’s response to note provided by Crest Nicholson in relation to housing figures

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				(CED025), and for consistency with proposed modifications to Appendix 1 and the Inspector's Post Hearing Advice Part 2 (IED012).
MM22	40	Para 3.8.13	<p>Insert to the end of paragraph 3.8.13:</p> <p><u><i>“Within Appendix 1 to the Plan a quantum is given for new homes on each of the Opportunity Sites but this is not a cap. Development on each of the Opportunity Sites should seek to deliver this indicative quantum of development, along with any other forms of development identified in Appendix 1 for the Site. It should nevertheless be consistent with the context and the character of the surrounding area and otherwise cause no unacceptable adverse effects.”</i></u></p>	In response to discussions arising from Day 2 of the hearing sessions
MM23	40/ 42	Policy LP3 and Para 3.9.5	<p>Modify policy LP3 wording as follows:</p> <p><i>“The Council will seek to maximise the provision of affordable housing in the borough by setting a <u>minimum</u> strategic affordable housing target of <del>30%</del> <u>35%</u>. The Council will achieve this by:</i></p> <p><i>(a) Delivering on average, a minimum of <del>336</del> <u>393</u> additional affordable homes per year;</i></p> <p><i>(b) Requiring affordable housing to be provided on sites with a capacity to provide 10 homes or more, <u>to be calculated in accordance with the density matrix set out in Table 3.2 of the London Plan;</u></i></p>	In response to R00452/05, Inspector's Preliminary Matters - question (i) on Housing White Paper (CED001), Inspector's Issue 5 Housing, q. xii), Statement of Common Ground with the GLA (CED019), and discussions arising from Day 2 of the hearing sessions

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			<p><i>(c) Provide<u>ing</u> a tenure mix of 60% social/ affordable rent housing and 40% intermediate (<u>including starter homes</u>);</i></p> <p><i>(d) Assessing the level of affordable housing on a site by site basis. Proposals will need to provide a viability assessment in order to justify the level of affordable provision on each site should proposals be below the <u>minimum 30% 35%</u> policy requirement <u>or where public subsidy is required to deliver the 35%</u>;</i></p> <p><i>(e) Delivering and supporting the delivery of affordable housing through other sources of supply, such as local authority new builds and estate regeneration;</i></p> <p><i><del>(f) The Council will support starter homes on non-designated commercial or industrial sites which have been demonstrated to be under used or no longer viable for commercial or industrial purposes; and”.</del></i></p> <p><i>(<del>g</del>) <u>Monitoring</u> the level of demand for self-build or custom build in the borough and plan for this need accordingly.”</i></p> <p>Amend final sentence of paragraph 3.9.5 to read:</p> <p><i>“In order to address the acute level of housing need in the borough, whilst also seeking to ensure that housing development remains viable the Council will adopt a <u>minimum</u> strategic affordable housing target of <del>30%</del> <u>35%</u> and a corporate affordable housing delivery target of <del>336</del> <u>393</u> homes per year or <del>5,040</del> <u>5,895</u> units over the plan period 2015-2030.”</i></p>	

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MM24	42	Para 3.9.6	<p>Amend paragraph 3.9.6 to read:</p> <p><i>The Council aims to maximise every opportunity to deliver affordable housing in accordance with London Plan policy 3.12 – Negotiating Affordable Housing, and the Mayor’s Affordable Housing and Viability SPG (2016). Where housing schemes are approved on the basis of an affordable housing offer below policy requirements, the Council will include provision for a re-appraisal of viability when the scheme has been completed and largely occupied. Where viability has improved, the applicant will be expected to make further affordable housing provision up to the maximum policy shortfall. <u>The Council will seek to achieve and exceed affordable housing through applying the 35% target on private schemes and seeking higher levels of delivery through grant funded, registered provider and council-led schemes. All schemes are expected to maximise the delivery of affordable housing and make the most efficient use of available resources to achieve this objective in accordance with the London Plan (2016) and the policies of this Plan. In accordance with the Mayor’s Affordable Housing and Viability SPG (2016), the Council will ensure affordable housing delivery is maximised from all sources, by considering a variety of funding and design solutions such as use of grant, RP’s own funding and innovative funding models to increase the overall number of affordable homes”.</u></i></p>	<p>In response to Inspector’s Issue 5 Housing, q. xii) (CED012), Statement of Common Ground with the GLA (CED019), and R01213/07, and R01100/06</p>
MM25	44	Policy LP4	<p>Number opening paragraph of Policy LP4 as follows:</p> <p><i>“1. The Council will support older, vulnerable and homeless residents in the borough by aiming to provide a sufficient supply of Specialist Accommodation, including temporary accommodation, to support independent living. The Council will support various forms of Specialist Housing where it:”</i></p>	<p>Council clarification, and in response to R01213/08 and Statement of Common Ground with the GLA (CED019)</p>

Modification Number	Page	Para/ Policy/ Section	Detail of Modification	Source/ Reason of Modification
			<p>Number 2<sup>nd</sup> paragraph as follows:</p> <p><u><i>“2. The Council will resist the loss of Specialist Accommodation unless:”</i></u></p> <p>Amend criteria 2(b) to read:</p> <p><i>“It can be demonstrated that there is a surplus of Specialist Accommodation in the area; <del>and or</del>”</i></p> <p>Insert new section (3) in policy LP4 Specialist Accommodation to refer to student accommodation as follows:</p> <p><u><i>“Student Accommodation</i></u></p> <p><u><i>3. Where student accommodation is required to meet strategic and local need, it will be supported where it is appropriately located within:</i></u></p> <p><u><i>(a) One of the borough’s Investment and Growth Areas;</i></u></p> <p><u><i>(b) Within or at the edge of a town centre; and</i></u></p> <p><u><i>(c) In an area of good public transport accessibility.</i></u></p> <p><u><i>In addition to meeting the requirements of the above, proposals for student accommodation will also need to demonstrate that:</i></u></p> <p><u><i>(a) There would be no loss of existing housing;</i></u></p> <p><u><i>(b) There would be no adverse impact on local amenity, in particular, the amenity of neighbouring properties and on-street parking provision;</i></u></p>	

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			<p><u>(c) The accommodation is of a high standard, including adequate unit size and compliance with daylight and sunlight standards;</u></p> <p><u>(d) Provision is made for units that meet the needs of students with disabilities;</u></p> <p><u>(e) The need for the additional affordable bedspaces can be demonstrated; and</u></p> <p><u>(f) The accommodation can be secured by agreement for occupation by members of a specified educational institution(s)."</u></p>	
MM26	46	Para 3.10.7	<p>Create a new sub-heading 'Student Accommodation' and add the following justification text after paragraph 3.10.7 to state:</p> <p><u>"Whilst there are no universities located within Redbridge and there is unlikely to be any significant increase in demand for student housing over the plan period, the Council support the provision of student housing in the borough. The London Plan (2016), policy 3.8, seeks to encourage a more dispersed distribution of future student provision taking into account development and regeneration potential in accessible locations. The Council will therefore support student housing in highly accessible locations, particularly areas with excellent transport connections to central London, such as Ilford and Crossrail.</u></p> <p><u>As also noted by the London Plan, paragraph 3.53, addressing demand for student housing should not compromise conventional housing supply, particularly affordable housing or undermine mixed and balanced communities. The Council will therefore resist student housing which would result in the loss of residential (C3) accommodation. New purpose built student housing may reduce pressure on conventional housing which is currently occupied by students.</u></p>	<p>In response to Inspector's Issue 7, q. ii) (page 18 of document CED028) and Statement of Common Ground with the GLA (CED019)</p>

Modification Number	Page	Para/ Policy/ Section	Detail of Modification	Source/ Reason of Modification
			<u><i>The Council will seek to secure student housing at rent level which are affordable levels to the wider student body.</i></u>	
MM27	46/ 47	Policy LP5 and Para 3.11.7	<p>Modify Policy LP5 as follows:</p> <p><u><i>“1. The Council will aim to secure a range of homes that will contribute to the creation of mixed, inclusive and sustainable communities by seeking all housing developments to provide a range of dwelling sizes and tenures particularly focusing on the provision of larger family sized homes (three bed plus) in line with the preferred housing mix, as set out in Table 4. The dwelling mix will be considered on a site by site basis and in applying the preferred housing mix regard will be given to the following:</i></u></p> <p><u><i>a) site size and other constraints;</i></u>  <u><i>b) the surrounding context and character;</i></u>  <u><i>c) the overall level of affordable housing proposed; and</i></u>  <u><i>d) the financial viability of the scheme.</i></u></p> <p><u><i>2. In addition, the strategic sites of King George and Goodmayes Hospital and Billet Road are all expected to meet the Council’s preferred dwelling mix.”</i></u></p> <p><del><i>The Council will seek the dwelling mix in new development in established suburban residential locations to consider and reflect the existing context and character.</i></del></p> <p><del><i>The Council recognises that town centres can be more challenging to provide a higher</i></del></p>	<p>In response to Inspector’s Issue 7, q. iii) (pages 20/21 of document CED028) and Inspector’s post hearing advice part 1 (IED011).</p>

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			<p><del>proportion of family housing and will therefore take a flexible approach when applying the preferred housing mix in such locations.</del></p> <p>Also number implementation, and modify paragraph 3.11.7 as follows:</p> <p><del>In considering dwelling mix, the Council will assess the character of the proposed development, its site size and other constraints, the surrounding context and character, the overall level of affordable housing proposed and the financial viability of the scheme. Whilst the Council recognises that smaller homes are more conducive to higher density town centre living, and larger family homes are more conducive to more suburban environments, development proposals will be expected to include all unit sizes.</del></p> <p><u>“The Council recognise that not all housing development in the borough will be able to meet the preferred housing mix. Therefore, flexibility around the preferred dwelling mix may be required, for example, to achieve a rational layout, the best possible accessibility arrangements or the need to satisfy design and amenity concerns. When considering the proportion of larger homes, the Council will take into account any features that make the development particularly suitable for families with children. For example, child-friendly features of housing development could include; the potential to provide space on site where children can play, either through private or communal space; dedicated children’s play space within the development or available nearby; access to existing open space; and the number of homes with direct access to private amenity space. It should be noted that the Council does not consider that the absence of any or all of these features justifies the omission of large homes from a development, and all the criteria in Policy LP5 should be fully considered. The Council</u></p>	



Modification Number	Page	Para/ Policy/ Section	Detail of Modification	Source/ Reason of Modification
			<p><u>will work with housing developers, particularly on schemes containing mainly flatted development, to develop innovative solutions to deliver a higher proportion of larger family sized units. In addition, it is expected that the strategic sites of King George and Goodmayes Hospitals and Billet Road will meet the preferred housing mix in order to address the significant need for larger family sized units in the borough. Indicative Masterplans prepared for these sites demonstrate that this is achievable.”</u></p>	
MM28	47/ 48/ 49	Policy LP6, Paras 3.12.5 – 3.12.9	<p>Modify Policy LP6 as follows:</p> <p><del>1. The Council will resist the conversion of a larger home(s) to smaller self-contained home(s) (C3) and hotels (C1) where:</del></p> <p><del>(a) It has a gross original internal floor space of less than 130 sq.m;</del>  <del>(b) It results in the over concentration of conversions in one street; or</del>  <del>(c) Appropriate car and cycle parking provision is not provided in accordance with the Council's Parking Standards (Appendix 7).</del></p> <p><del>2. The Council will resist the conversion of a larger home(s) to Buildings in Multiple Residential Occupation (Sui Generis) where:</del></p> <p><del>(a) It has a gross original internal floor space of less than 150 sq.m; and</del>  <del>(b) It meets the requirements of 1 (b) and (c) above.</del></p> <p>3: <u>1. The Council will only support the conversion of larger home(s) into smaller self-contained units (C3) and hotels (C1) where:</u></p>	In response to Inspector's Issue 7, q. iv) (pages 21/22 of document CED028)

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			<p>(a) It is located in a Metropolitan, District or Local Centres (as identified in Appendix 5);</p> <p>(b) The gross floor area of the property exceeds 130 sq.m where two units are proposed and exceeds <del>150</del> <u>180</u> sq.m where three or more units are proposed;</p> <p>(c) No significant loss of character or amenity occurs to the area as a result of increased traffic, noise and/or general disturbance; <del>and</del></p> <p>(d) Appropriate car and cycle parking provision are provided in accordance with <u>London Plan standards</u> <del>the Council's Parking Standards (Appendix 7)</del>;</p> <p><u>(e) it meets the national space standards; and</u></p> <p><u>(f) the conversion provides at least one larger family sized home of 74sqm (3 bed plus) on the ground floor with access to a dedicated rear garden of the converted home.</u></p> <p><del>4.2.</del> <u>The Council will only support the conversion of larger house(s) into Buildings in Multiple Residential Occupation (Sui Generis) where:</u></p> <p>(a) The gross floor area of the property exceeds <del>150</del> <u>180</u> sq.m;</p> <p>(b) It meets the requirements of criteria 3 (a), (c) and (d) above; and</p> <p>(c) It provides a Management Plan.</p> <p>Add the following sentence to the end of paragraph 3.12.5:</p> <p><u>"In assessing if there is an over-concentration of dwelling conversions and Buildings in Multiple Residential Occupation in an area, regard will be given to the cumulative impact of parking, noise, overcrowding and waste affecting the general street scene."</u></p> <p>At end of paragraph 3.12.6, insert:</p>	

Modification Number	Page	Para/ Policy/ Section	Detail of Modification	Source/ Reason of Modification
			<p><u><i>“It is important that dwelling conversions and Buildings in Multiple Residential Occupation provide satisfactory living conditions for both the benefit of occupiers and neighbours. The threshold of 130 sq.m and 180 sq.m are the smallest floorspace which could successfully incorporate two or three self-contained units, of which one is ‘family sized’ (e.g. 3 bed plus) and sufficient space for appropriate access arrangements. This has been based on the National Space Standards.”</i></u></p> <p>Join paragraph 3.12.7 to the remaining sentence to the end of the previous paragraph 3.12.6 as follows:</p> <p><u><i>“Consequently, the Council will seek to restrict the conversion of existing family sized housing into <del>flats</del> smaller self-contained units. However, where conversions are considered appropriate, to mitigate the further erosion of the borough’s housing stock of larger houses, the Council will require a ‘family’ sized unit(s) (3 bed plus) to be included within any proposed conversion, <del>and to introduce limits on the proliferation of rebuild flats on small infill sites in areas of established family housing. Flats may be an appropriate part of the dwelling mix on larger self contained sites within the residential area.”</del></i></u></p> <p>Insert new paragraph after 3.12.8 to read:</p> <p><u><i>“Proposals for Buildings in Multiple Residential Occupation should provide a management plan. The effective management of an Buildings in Multiple Residential Occupation can significantly reduce the negative impacts on amenity of neighbouring properties and improve the quality of living for occupants. The management plan could address issues related to waste and recycling collection, management of</i></u></p>	

Modification Number	Page	Para/ Policy/ Section	Detail of Modification	Source/ Reason of Modification
			<p><u>communal areas (both internal and external), appropriate health and safety checks and management of excessive noise.”</u></p> <p>Amend first sentence of paragraph 3.12.9 to read:</p> <p><u>“By their nature, dwelling conversions and Buildings in Multiple Residential Occupation are more intensely used. Given this, it is best to locate them in areas with good public transport accessibility which are in close proximity to local shops and services. Dwelling conversions and Buildings in Multiple Residential Occupation are therefore supported in the borough’s town centres. <del>Town centre and more conducive to higher density and flatted development as they are highly accessible and provide a wide range of services.”</del></u></p>	
MM29	49/ 50	Policy LP7, Paras 3.13.5 - 3.13.6	<p>Modify Policy LP7 as follows:</p> <ol style="list-style-type: none"> <li data-bbox="667 951 1720 1177">1. <u>The Council will resist the use of outbuildings ordinarily used for ancillary purposes within a dwelling curtilage or garden as separate sleeping and living accommodation <del>will be resisted. The Council will not support residential development in back gardens unless it is compatible with the use, character, appearance and scale of surrounding context (LP26) and does not unduly impact upon the amenity of neighbouring residents.</del></u></li> <li data-bbox="667 1225 1659 1294">2. <u>The Council will only support the subdivision of existing housing plots and gardens to create new residential accommodation where;</u></li> </ol>	In response to Inspector’s Issue 7, q. vi) (page 24/25 of document CED028)

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			<p><u>a) development provides both existing and future occupiers with an appropriate level of internal space and external amenity space in accordance with LP29;</u>  <u>b) it meets the design requirements of LP26; and</u>  <u>c) it provides its own independent access.</u></p> <p>And number implementation.</p> <p>Amend paragraph 3.13.5 as follows:</p> <p><del>The Council will therefore seek to resist buildings that provide additional living accommodation as either a separate dwelling or as extensions to the primary living accommodation in back gardens. “Whilst the Council recognise that some back garden development may be appropriate, it seeks to ensure that such development provides occupants of the existing property and occupants of the new development with a quality internal and external environment. In addition, such development should not cause harm to the amenity of neighbouring properties and should provide its own independent access.”</del></p> <p>Modify paragraph 3.13.6 as follows:</p> <p><u>“The Council has seen an increase of illegal accommodation in sheds and outbuildings – ‘Beds in Sheds’. ‘Beds in Sheds’ are usually built in the rear gardens of residential properties and may be rented to tenants for sleeping purposes. Such accommodation does not tend to have planning permission for such usage or building regulation consent. Such accommodation is of a poor standard, unfit for human habitation as well as being a significant health and safety risk to occupants. Such accommodation</u></p>	

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			<p><i><u>also impacts on the amenity of neighbouring properties, particularly with noise and disturbance. Given the serious problems that 'Beds in Sheds' cause, the Council seek to resist such development.</u></i> <del>Usually, this type of accommodation is of poor standard, let at high rent to those who are unable to access alternative accommodation.</del></p>	
MM30	50/ 51	Policy LP8 and Para 3.14.4	<p>Amend the second part of Policy LP8 as follows:</p> <p><i>"2 Development of any additional temporary or permanent Gypsy and Traveller accommodation will <u>only be supported where:</u> <del>permitted subject to all of the following criteria:</del></i></p> <p><i>a) The site provides for an appropriate layout, in terms of pitches, amenity buildings, hard-standings and open spaces;</i></p> <p><i>b) <u>The site is not located in the Green Belt, unless there are very special circumstances;</u> <del>Does not have any relevant planning policy designations that restrict the use of the site such as Site of Special Scientific Interest, Green Belt, Playing field, Principal Site of Nature Conservation Importance, Site of Local Nature Conservation Importance, Local Nature Reserve and Allotments;</del></i></p> <p><i>c) <u>The site is located in flood zone 1 or exceptionally in flood zone 2 and is otherwise suitable for development;</u></i></p> <p><i>d) The site is serviced by a suitable access road and is accessible from the public highway and adequate provision for parking, turning and servicing on site to ensure road safety for occupants and visitors;</i></p> <p><i>e) The site is well related to existing communities and accessible to local services and facilities, such as shops, <del>primary and secondary</del> schools, healthcare and public</i></p>	In response to Inspector's Issue 7, q. x) (CED028)

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			<p>transport;</p> <p><del>f) Proposals are sensitive to local character and surroundings The use of the site would have an undue effect on the amenity of occupiers of adjoining land; and</del></p> <p><del>g) The use of the site would have an undue effect on the visual amenity of the locality.”</del></p> <p>Insert new supporting text after paragraph 3.14.4 as follows:</p> <p><u>“The Council will continue to manage the borough’s existing Gypsy and Traveller sites to meet the needs of the Gypsy and Traveller communities and, to ensure integration with surrounding communities. Policy LP8 includes a series of criteria that will be used to determine any future additional site’s capacity and suitability to provide Gypsy and Traveller accommodation in the configuration proposed.</u></p> <p><u>The suitability of the site for use as a Gypsy and Traveller site is an important consideration. Green Belt will not be acceptable unless very special circumstances exist, as per national and London Plan policy. In addition, like mainstream housing, Gypsy and Traveller accommodation requires sites of suitable quality in terms of availability of supporting infrastructure (waste management, utilities, communal spaces), accommodation and access for large vehicles, amenity, and avoidance of excessive exposure to noise and other environmental pollutants. All such needs should be set out and met on site through the proposed design and necessary management plans, demonstrating that they will deliver appropriate housing quality and highway safety, capacity and environmental quality.</u></p> <p><u>The availability of supporting community infrastructure such as health, education and</u></p>	

Modification Number	Page	Para/ Policy/ Section	Detail of Modification	Source/ Reason of Modification
			<p><u>transport links is also essential. The site should be in a sustainable location and should be in reasonable proximity to local services and facilities.</u></p> <p><u>To help deliver sustainable communities and quality placemaking, the policy requires proposals to consider the amenity of new residents and impact on surrounding communities. In doing so, regard will be had to community cohesion, integrating the site and the local community.</u></p> <p><u>The Council will continue to engage with neighbouring boroughs and districts to ensure that sub-regional need is appropriately addressed and provided for. Monitoring and continuing engagement will inform the review of the evidence base and assessment of whether that evidence base and associated policy remain up to date.”</u></p>	
MM31	52	Policy LP9	<p>Amend Policy LP9 as follows:</p> <p><u>“1. The Council will promote the regeneration of the borough’s town centres and support their vitality and viability by:</u></p> <p><u>a) Providing a minimum 23,911sq.m (net) of new comparison retail floorspace (34,159sq.m gross) and 8,562sq.m (net) of new retail convenience floorspace (12,231sq.m gross) in the borough’s designated town centres”</u></p> <p><u>b) <del>2</del>-Retaining a strong hierarchy of town centres <u>by directing town centre uses to: <del>as follows to ensure that:</del></u></u></p>	<p>To reflect discussion during Day 8 of the hearing, in response to Inspector’s Issue 7, q. (ii) and (iv) (document CED028), and for consistency with figure 13</p>



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			<p><i>(aj) The Metropolitan Centre of Ilford, as the key regional centre within the borough, particularly recognises the significance of a strong comparison retail sector and encourages a wider mix of uses including leisure, office and other commercial uses and community and cultural uses;</i></p> <p><i>(bij) The District Centres of Barkingside, Gants Hill, South Woodford, Wanstead, <u>Green Lane</u> and Chadwell Heath (part) will be promoted to provide a complementary retail, leisure, office and evening offer and;</i></p> <p><i>(eiii) The Local Centres of Woodford Broadway/ Snakes Lane, Woodford Bridge, <u>Woodford Green</u>, Manford Way, Seven Kings, Goodmayes, Ilford Lane and <u>Green Lane Newbury Park</u> and Key Retail Parades predominantly provide a local level of retailing and community facilities.</i></p> <p><u><i>The scale of development proposed in each centre should be appropriate to the role and character of the centre and its catchment. Proposals outside town centres should demonstrate that all in-centre, and then all well connected edge of centre, options have been assessed for their availability, suitability and viability.</i></u></p> <p>And re-label points 3-6 as c-f.</p>	
MM32	56/ 57	Policy LP10 and Para 3.17.3	<p>Amend Policy LP10 point 1 criteria as follows:</p> <p><i>“(a) Maintaining the town centre boundaries, primary and secondary frontages and key retail parades as set out on the policies map;</i></p> <p><i>(b) Supporting the primary retail function of primary shopping frontages by <u>seeking that a minimum maintaining 70% of ground floor units are used as A1 retail uses.</u></i></p>	In response to R01101/02, Inspector’s Issue 7, q. iv (document CED028), discussion during day 8 of the hearing sessions, and Inspector’s post hearing advice part 1 letter

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			<p><u>Proposals for non-A1 uses in defined frontages that do not meet this target will only be supported where criteria (d) below is met;</u></p> <p><u>(c) Supporting diversity in the secondary frontages and Key Retail Parades by seeking that a minimum <del>maintaining</del> 540% of units are used as A1 for retail uses. Proposals for non-A1 uses in defined frontages that do not meet this target will only be supported where criteria (d) below is met;”</u></p> <p><u>(d) Additionally, in making decisions, the Council will consider the following factors Considering the following factors when determining proposals for alternative town centre uses that do not meet criteria (b) and (c) above:</u></p> <p><u>i) if the unit has been long term vacant (i.e. at least 12 months), and subject to continuous marketing for A1 retail use with reasonable terms and conditions;</u></p> <p><u>ii) if the location and size of the unit offers a prime retail opportunity;</u></p> <p><u>iii) the extent to which the proposed use is capable of attracting a significant number of shoppers/visitors to the centre;</u></p> <p><u>iv) the extent to which the proposed use contributes to the Council's aspirations and priorities, in particular, the regeneration objectives for the local area; and</u></p> <p><u>v) the contribution the proposed use will make to the vitality and viability of the proposed frontage and the centre generally, and whether it will contribute to shoppers experience.</u></p> <p><u>(<del>e</del>) Supporting uses which provide active frontages at ground floor, support street activity and generates a high degree of pedestrian movement;</u></p>	(IED011).

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			<p><i>(ef) Encouraging effective use of upper floors that contributes to town centre vitality and regeneration, such as business or residential use;</i></p> <p><i>(fg) <u>Requiring</u> in accordance with paragraph 24 of the NPPF, <del>that the Council will require</del> town centre uses such as retail, leisure and office to be located in the borough's town centres and then 'edge of centre'. The Council will apply a sequential test and an impact assessment (where development is over 2,500sq.m) to planning applications for new and extended developments which are proposed to be located outside of the borough's town centres;</i></p> <p><i>(gh) Resisting development that results in the adverse impacts on the amenities of nearby occupiers;</i></p> <p><i>(hi) Resisting development that harms the safety and traffic flow or increases traffic and parking problems in the town centre; and"</i></p> <p>And re-number implementation points from 3-7 to 1-5</p> <p>Amend para 3.17.3 to read:</p> <p><i>"In order to promote vital and viable town centres, the Council considers it important to manage town centre uses in well-defined areas, <u>and avoid long term vacancies.</u> Grouping shops conveniently together attracts shoppers and if the shopping frontage is broken or diluted by uses not directly related to shopping trips, this leads to a loss of attractiveness and thus activity. This approach encourages greater diversity of uses but also retains the retail function of the borough's town centres. <u>It also recognises that there may be instances where development proposals that do not meet normal</u></i></p>	

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			<p><u>retail frontage thresholds can provide wider regeneration benefits without undermining the primary retail function of the centre; in terms of matters such as increased jobs, footfall, and visitor spend. In such circumstances, the onus will be on developers to demonstrate overriding regeneration benefits.</u></p>	
MM33	58	Policy LP11	<p>Amend Policy LP11 wording as follows:</p> <p><u>“1. The Council will resist the proliferation and over concentration of Hot Food takeaways in the borough by:</u></p> <p><del>(a) Requiring that no more than 5% of units within Primary and Secondary frontages consist of A5 uses;</del></p> <p><del>(b) Requiring that no more than one A5 unit is located within 50m radius of an existing A5 unit.</del> <u>Requiring each new unit to be separated from any existing A5 unit or group of units by at least two non A5 units;</u></p> <p><del>(c) Resisting proposals for A5 uses that fall within 400m of the boundary of an existing school, youth centre or park;</del></p> <p><del>(d) Resisting proposals that have an unacceptable impact on highway safety;</del></p> <p><del>(e) Resisting proposals that have an undue impact on residential amenity in terms of noise, vibrations, odours, traffic disturbance, litter or hours of operation;</del></p> <p><del>(f) Resisting proposals that operate in inappropriate hours of the day;</del></p> <p><del>(g) Resisting proposals that do not provide effective extraction of odours and cooking smells; and</del></p> <p><del>(h) Resisting proposals that do not provide adequate on site waste storage and disposal of waste products</del></p>	<p>In response to Inspector’s Issue 7, q. (v) (document CED028) and Inspectors post hearing advice part 1 (IED011).</p>

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			<p><u>2.</u> <del>The Council will resist the proliferation and overconcentration of betting/gambling shops, and money lenders (A2) and Shisha Bars (sui generis) in the borough by:</del></p> <p><del>(a) Requiring them to be located within the borough's town centres (Metropolitan, District and Local) and in accordance with LP10;</del></p> <p><del>(b) Seeking them to demonstrate how they will promote the health and wellbeing of borough residents; Requiring each new sui generis unit to be separated from any existing sui generis unit or group of units by at least two non sui generis units;</del></p> <p><del>(c) Requiring that no more than one Betting/Gambling Shop or Payday Lender is located within a 50m radius of an existing Betting shop or payday lender unit; and</del></p> <p><del>(d) (c) Requiring they provide active frontages and have a positive visual impact on the street scene, including meeting policy LP28 – Advertising and Shopfronts;</del></p> <p><del>The Council will resist the development of Shisha Bars (Sui Generis) in the borough by:</del></p> <p><del>(a) Requiring them to be located within the borough's town centres and in accordance with LP10 and criteria (b) below;</del></p> <p><del>(b) Resisting proposals for Shisha Bars that fall within 400m of the boundary of an existing school, youth centre or park;</del></p> <p><del>(c) Seeking them to demonstrate how they will promote the health and wellbeing of borough residents;</del></p> <p><del>(d) Demonstrating how they meet/comply with environmental health and smoking legislation;</del></p> <p><del>(e) (d) Resisting proposals that have an significant impact on residential amenity in terms of noise, vibrations, odours, traffic disturbance, litter or hours of operation; and</del></p> <p><del>(f) (e) Resisting proposals that operate with inappropriate hours of operation."</del></p>	

Modification Number	Page	Para/ Policy/ Section	Detail of Modification	Source/ Reason of Modification
			And renumber implementation from 8-10 to 1-3	
MM34	60	Policy LP13	<p>Modify Policy LP13 as follows:</p> <p><i><u>"1. The Council will only support proposals for new hotel facilities and tourist accommodation such as hotels, hostels, boarding and/ or quest houses, bed and breakfast (use class C1) in the following locations:</u></i></p> <p><i>(a) <del>Investment and Growth Areas, Metropolitan and, District and Local centres;</del> or</i>  <i>(b) Locations which have good public transport connections to central London and/ or international or national transport hubs;</i></p> <p><i>2. <u>New hotel and tourist accommodation should meet</u> <del>The Council will support proposals for tourist accommodation such as hotels, hostels, boarding and/ or quest houses, bed and breakfast (use class C1) (including the conversion of existing buildings into tourist accommodation) where all of the following criteria: are met:</del></i></p> <p><i>(a) The size and character of the site or building <del>are</del> is suitable for the proposed use;</i>  <i>(b) The proposed use will be compatible with the character and appearance of the area;</i>  <i>(c) <del>The proposal does not result in an over concentration of hotel, boarding and/ or quest houses in that particular locality;</del></i>  <i><del>(d) The residential amenities of local residents will not be unduly affected through noise, disturbance, loss of light, outlook or privacy;</del></i></p>	In response to the Inspector's Issue 7, q. xi) (document CED028)

Modification Number	Page	Para/ Policy/ Section	Detail of Modification	Source/ Reason of Modification
			<p><i>(ed) The existing environment or transport system will not be adversely affected by way of unacceptable increases to traffic and parking in the area; <del>and</del></i></p> <p><i>(fe) The proposal has adequate servicing arrangements and provides the necessary off-highway pickup and set down points for taxis and coaches;</i></p> <p><i><u>(f)The proposal meets the cycle and car parking standards set out in Appendix 7 and the London Plan; and</u></i></p> <p><i><u>(g) The proposal does not result in the loss of residential accommodation.”</u></i></p>	
MM35	61/ 62/ 63/ 64	Policy LP14, Paras 3.21.4, 3.21.7, 3.21.9, 3.21.10	<p>Amend Policy LP14 to read:</p> <p><i>“1. The Council will promote business and employment, and maintain the viability of key employment sites by:</i></p> <p><i>(a) Protecting and directing industrial activity to the borough’s Strategic Industrial Locations (SILs) at Hainault Business Park and Southend Road Business Park as the prime locations for Class B1 (business), Class B2 (general industry), and <u>class B8 (storage and distribution)</u> development. Proposals for uses falling outside the above uses will be resisted;</i></p> <p><i>(b) Allocating Hainault Business Park as an Industrial Business Park (IBP) and Southend Road Business Park as a Preferred Industrial Location (PIL) and Industrial Business Park (IBP);</i></p> <p><i>(c) Intensifying and managing Local Business Areas of Newton Industrial Estate, Forest Road, Hainault Works, <del>and</del> Ravens Road, <u>and Connaught Road West</u>. In these areas the Council will support:</i></p>	In response to R01212/02, Inspector’s Issue 7, q. (vii) and (ix) (document CED028), to clarify policy approach, and for consistency with evidence base recommendations

Modification Number	Page	Para/ Policy/ Section	Detail of Modification	Source/ Reason of Modification
			<p><i>i) Intensification of Class B1 (business), Class B2 (general industry), <u>and Class B8 (storage and distribution) uses</u>; particularly premises to accommodate small and medium enterprises (SMEs); and</i></p> <p><i>ii) Mixed use employment led schemes which include housing and live/work units as long as it does not prejudice the ongoing use of the area for business purposes, <u>there is no net loss of employment space</u>, and where residential use is compatible with existing employment uses.</i></p> <p><i><u>(d) Seeking to protect Local Business Areas at The Shrubberies, Barnado's, Coventry Road and Cranbrook Road, Beal Road, Wellesley Road, and Roden Street North for continued office use.</u></i></p> <p><i><u>(de) Making more effective and efficient use of non-designated employment land by managing the release of 14.45 ha of employment land considered to be outdated, underutilised or poorly performing. Unless identified as a Development Opportunity Site in Appendix 1, proposals for alternative uses on non-designated employment land should: On such sites proposals should:</u></i></p> <p><i>i. Demonstrate that continued business activity will conflict with character, appearance and amenity of the locality and its surrounding area;</i></p> <p><i>ii. Demonstrate the premises have been vacant for over 12 months, following active marketing <u>using reasonable terms and conditions</u>, and has no reasonable prospect of being occupied for another business use; and</i></p>	



Modification Number	Page	Para/ Policy/ Section	Detail of Modification	Source/ Reason of Modification
			<p><i>“iii. Include <u>compatible modern fit for purpose employment uses, which could include live/work units, as part of any new or replacement mixed use schemes.</u>”</i></p> <p><i>(ef) Supporting a minimum 21,206 sq.m (net) of new purpose built modern flexible office and business accommodation (24,948 sq.m gross) in Investment and Growth Areas, <del>and</del> town centres, and other land previously used for employment purposes, to accommodate small and medium enterprises (SME) falling in Class B1; and”</i></p> <p><i>(fg) Promoting the established Business Improvement Districts (BIDs) in Ilford Town Centre and Hainault Business Park and support initiatives by local businesses to establish new BIDs.</i></p> <p><i><u>2. Where live/ work units are proposed:</u></i></p> <ul style="list-style-type: none"> <li><i>a) <u>At least 50% of the proposed floorspace of an individual unit should be B1 workspace, to ensure it is genuinely dual use, and the workspace is compatible with the residential element;</u></i></li> <li><i>b) <u>the residential element should meet amenity and internal space standards;</u></i></li> <li><i>c) <u>the character and function of the surrounding area should not be compromised, and</u></i></li> <li><i>d) <u>where development thresholds are met, affordable housing requirements will apply.</u>”</i></li> </ul> <p>At end of paragraph 3.21.4 insert:</p> <p><i><u>“In doing so, poorer quality space can be released to more productive use such as housing, whilst in appropriate locations also offering the opportunity to secure compatible business space for modern business needs as part of mixed use</u></i></p>	

Modification Number	Page	Para/ Policy/ Section	Detail of Modification	Source/ Reason of Modification
			<p><u>developments.”</u></p> <p>Amend 4<sup>th</sup> sentence of paragraph 3.21.7 to read as follows:</p> <p><i>“The Council will aim to support and facilitate new business growth and nurture the development of emerging industries by providing a minimum 21,206 sq.m (net) / 24,948 sq.m (gross) new <u>strategically located, accessible, modern fit for purpose business space premises within accessible locations including Investment and Growth Areas and town centres</u>, particularly as part of mixed use development (also see LP1A-E and LP9). <u>Based on the HCA’s Employment Density Guide (3<sup>rd</sup> edition), a gross to net floorspace ratio of 85% has been used. Sites listed in Appendix 1 provide gross employment floorspace figures, and demonstrate that minimum targets can be met across identified development opportunity sites.”</u></i></p> <p>Amend last sentence of paragraph 3.21.9 to read:</p> <p><i>“Such diversification could include housing as part of a mix of employment and commercial uses, <u>provided this does not undermine the overall business function of the area.”</u></i></p> <p>Amend paragraph 3.21.10 to read:</p> <p><i>“Offices provide an important component of local employment. However, as the ELR (2016) identifies, the borough hosts a considerable supply of outdated and underutilised office accommodation which no longer meets market demand and is failing to contribute to local employment. The majority of such sites are referred to as <u>non-designated employment land and their redevelopment or conversion to more</u></i></p>	

Modification Number	Page	Para/ Policy/ Section	Detail of Modification	Source/ Reason of Modification
			<p><i><u>productive uses broadly supported. The ELR does however also identify some town centre office stock with use and characteristics that merit protection, and such sites have subsequently been designated as Local Business Areas. <del>the future use of such sites is being further undermined by changes to permitted development rights meaning the Council has little control over changes of use of conversions from offices to residential.</del></u></i></p>	
MM36	66	Policy LP15	<p>Amend Policy LP15 numbering and wording as follows:</p> <p><i><u>1. The Council will promote economic diversity and support existing and new business development in the borough by:</u></i></p> <p><i><del>1 a) Seeking the provision of new business (B1) floorspace, such as incubator space, either in new commercial or mixed-use schemes within Investment and Growth Areas or as part of a mixed use scheme in Local Business Areas and non-designated employment land (See LP14);</del></i></p> <p><i><del>2 b) Providing flexible space within residential units, particularly in town centres, that can be used for home working and start-up space wherever feasible; and</del></i></p> <p><i><del>3 c) Seeking the provision of a range of unit sizes, that are flexible, suitable for sub-division and configuration for new uses and activities, including for occupation by small or independent commercial enterprises; and</del></i></p> <p><i><del>4 d) Seeking, <u>through the use of planning obligations, the appointment of managed workspace providers where new business space is provided, the provision of affordable rents, flexible leases, and lettings for desk space</u> to ensure development caters for a range of business needs and users.</del></i></p> <p><b><i>“Implementation Actions</i></b></p>	<p>In response to Inspector’s Issue 7, q. xii) (document CED028), for consistency, and to reflect implementation rather than monitoring of policy</p>

Modification Number	Page	Para/ Policy/ Section	Detail of Modification	Source/ Reason of Modification
			<p><del>5 Net change of B1a, B1b, B1c, C1 and D1 uses within Locally Significant Industrial Sites (LSIS) and the boroughs Town Centres. 1. Developers of mixed use schemes will be encouraged to engage with managed workspace providers at the design stage, to ensure new commercial space meets end user requirements”</del></p>	
MM37	68	Policy LP17	<p>Amend part (1e) of Policy LP17 to read:</p> <p><i>“Supporting and facilitating the expansion of existing schools and health facilities where a clear need can be demonstrated, <u>in addition to the provision of new and expanded facilities on sites identified in Appendix 2 and the Infrastructure Delivery Plan;</u>”</i></p> <p>Amend and re-label part (1g) as follows:</p> <p><del>“2. (g) Resisting the loss of existing lawful community infrastructure. Where proposals involve the loss of infrastructure this will only be supported where:</del></p> <p><i>(ig) It is clearly demonstrated that there is no longer a need, <u>within the local community for the existing use or for re-use of the building or site for any other community use; or within the local community</u></i></p> <p><del>(ib) The building is no longer suitable; or</del></p> <p><del>(iic) The facilities in the building are being re-provided elsewhere in the borough. ;</del></p> <p><del>and</del></p> <p><del>(iv) There is sufficient provision nearby”</del></p> <p>Re-number and add to section 2 as follows:</p>	<p>In response to R01099/03, R01099/05, R01217/05, Inspector’s Issue 7, q. xv) (document CED028), and in response to discussions arising from Day 1 of the hearing sessions</p>

Modification Number	Page	Para/ Policy/ Section	Detail of Modification	Source/ Reason of Modification
			<p><i><u>23.</u> New community infrastructure should be located in or on the edge of the borough's town centres. The provision of new or extended community infrastructure outside of town centres will only be supported where they are local in nature and scale, where a local need can be demonstrated and where there is no undue impact on the amenity of existing residents or highway network.</i></p> <p><i><u>4.</u> The dual use of existing and new community infrastructure will be supported in areas of good accessibility in order to create community hubs offering a range of services, subject to satisfactory management arrangements being put in place.</i></p> <p><i><u>5.</u> The Council will require that new development be accompanied by proposals for the provision of the community infrastructure required to meet the needs arising from that development. The Council will secure delivery of community infrastructure within Development Opportunity Sites in accordance with the policies of Section 3 and Appendix 1 of the Plan. Within the Investment and Growth Areas, the Council will seek to secure new community infrastructure, where appropriate, as part of mixed use proposals and the key infrastructure listed in Policies LP1A – LP1E. The Council will seek necessary funding of new community infrastructure, including, where appropriate, from development proposals, in accordance with policy LP41 and Appendix 2 of the Plan.”</i></p> <p>Rephrase final sentence point 2 of implementation under Policy LP17 to read:</p> <p><i>“External agencies include (but are not limited to) the NHS, <u>Education Funding Authority</u>, TfL, Metropolitan Police, Thames Water, National Grid, <del>and</del> Highways</i></p>	

Modification Number	Page	Para/ Policy/ Section	Detail of Modification	Source/ Reason of Modification
			<i>Agency, and Redbridge Clinical Commissioning Group”</i>	
MM38	70	Para 3.24.7	<p>Insert the following to the end of paragraph 3.24.7:</p> <p><u><i>“There is more certainty and detail regarding infrastructure which is programmed to be delivered in the first five years of the plan. Policies LP1A-LP1E directly make provision for infrastructure including references to the need for new schools and health facilities, in particular, on the key strategic sites. For the later stages of the plan period, delivery of infrastructure items will be subject to further feasibility and funding.”</i></u></p>	In response to Inspector’s Issue 7, q. xiv) (document CED028)
MM39	72	Para 3.28.3	<p>Amend final sentence of paragraph 3.28.3 to read:</p> <p><u><i>“The following infrastructure is covered by this policy: For the purposes of this policy, community infrastructure is defined as:</i></u></p> <ul style="list-style-type: none"> <li>▪ <i>Education (including early education, primary and secondary schools, further education and adult community learning);</i></li> <li>▪ <i>Health (including local health clinics and district hospitals);</i></li> <li>▪ <i>Library Services;</i></li> <li>▪ <i>Sporting and Leisure Facilities;</i></li> <li>▪ <i>Community Care Facilities;</i></li> <li>▪ <i>Cultural Facilities;</i></li> <li>▪ <i>Places of Worship;</i></li> <li>▪ <del><i>Waste Management and Disposal;</i></del></li> </ul>	In response to Inspector’s Issue 7, q. xiii) (document CED028)

Modification Number	Page	Para/ Policy/ Section	Detail of Modification	Source/ Reason of Modification
			<ul style="list-style-type: none"> <li>▪ <i>Public Emergency Services (fire/police);</i></li> <li>▪ <del><i>Electricity and Gas;</i></del></li> <li>▪ <del><i>Water and Sewerage; and</i></del></li> <li>▪ <i>Public Houses;</i></li> <li>▪ <i><u>Community centres/halls; and</u></i></li> <li>▪ <i><u>Playgrounds and open space.”</u></i></li> </ul>	
MM40	72/ 75	Policy LP18 and Para 3.29.2	<p>Number each policy point 1-5 and modify Policy LP18 (3)(ii) to read:</p> <p><i>“Proposals for major development schemes (150 units or more) to include a Health Impact Assessment (HIA) <del>relative to the scale of development proposed.”</del></i></p> <p>Insert new sentence after 3<sup>rd</sup> sentence in para 3.29.2 as follows:</p> <p><i><u>“For major developments this will be evidenced through the submission of a Health Impact Assessment (HIA). For the purposes of a HIA, major developments are regarded as developments of 150 or more homes.”</u></i></p>	Updated in response to Inspector’s Issue 7, q. xvi) (document CED028) and following discussions during day 8 of the hearing sessions.
MM41	78/ 79	Policy LP19 and Paras 4.3.2 – 4.3.3	<p>Amend Policy LP19 wording as follows:</p> <p><i>“<u>1.</u> The Council will tackle climate change and promote measures to meet carbon dioxide reduction targets by:</i></p> <p style="padding-left: 40px;"><i>(a) Promoting zero carbon development and requiring all developments to reduce carbon dioxide emissions through following the steps <u>in line with the London Plan policy 5.2 energy hierarchy</u></i></p> <p style="padding-left: 40px;"><i><del>(b) Requiring development to incorporate renewable energy and low carbon</del></i></p>	In response to Inspector’s Issue 8, q. ii) (document CED029)

Modification Number	Page	Para/ Policy/ Section	Detail of Modification	Source/ Reason of Modification
			<p><del>technologies;</del></p> <p><del>(eb) Requiring all major development to demonstrate how London Plan targets for carbon dioxide emissions have been met;</del></p> <p><del>(dc) Ensuring that the location of development and mix of land uses minimise the need to travel by car and help to support decentralised energy networks; and</del></p> <p><del>(ed) Working with partners to identify opportunities for carbon reductions and encouraging the take-up of opportunities to improve the energy efficiency of the existing built environment.”</del></p> <p>Amend paragraph 4.3.2 as follows:</p> <p><del><u>National and regional planning policies seek to reduce carbon dioxide emissions according to the following energy hierarchy “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:</u></del></p> <ul style="list-style-type: none"> <li>▪ <del>Be lean (use less energy – energy efficiency)</del></li> <li>▪ <del>Be clean (supply energy efficiently – low carbon energy)</del></li> <li>▪ <del>Be green (use renewable energy)”</del></li> </ul> <p>Insert a new paragraph after 4.3.3 as follows:</p> <p><u>“Be Lean</u></p>	



Modification Number	Page	Para/ Policy/ Section	Detail of Modification	Source/ Reason of Modification
			<p><u>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'.</u></p> <p><u>Be clean</u></p> <p><u>The second stage of the energy hierarchy 'Be clean' should demonstrate how the development will supply energy efficiently through decentralised energy.</u></p> <p><u>Be green</u></p> <p><u>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."</u></p>	
MM42	79	Para 4.3.7	<p>Amend to read:</p> <p><i>"The Council has also sought to identify opportunities for large scale renewable energy within the borough. This work has concluded that due to the built-up nature of the borough, these opportunities are limited to large scale wind in the north-east corner of the borough that could compromise the openness of the green belt. Most renewable energy opportunities are <u>therefore</u> likely to be at a domestic scale and through solar hot water, solar photovoltaic and heat pumps (particularly air and</i></p>	Council - clarification

Modification Number	Page	Para/ Policy/ Section	Detail of Modification	Source/ Reason of Modification
			<i>ground).</i> "	
MM43	80	Policy LP20	<p>Add new policy point 2c to Policy LP20 to read:</p> <p><u><i>"Supporting the use of on-site renewable energy as a means of meeting energy reduction targets in line with the energy hierarchy in 1 above, provided it does not significantly harm local amenity."</i></u></p> <p>Add to implementation section:</p> <p><u><i>"5. The Council will produce a Planning Obligations SPD that will include details on how a carbon offset fund could work in the borough."</i></u></p>	To clarify role of renewable energy in meeting energy reduction targets, and in response to R01212/09
MM44	81	Policy LP21	<p>Amend Policy LP21 to read as follows:</p> <p><u><i>"1. The Council will seek to ensure that development does not increase flood risk and implements opportunities to reduces the risk of flooding where possible overall."</i></u></p> <p><del>1</del><u><i>2. The Council will minimise the risk to people and property from surface and fluvial flooding by:</i></u></p> <p><u><i>(a) Safeguarding the functional flood plain (Flood Zone 3b) as land where water can flow to or be stored in times of a flood from development other than water compatible uses or essential infrastructure"</i></u></p>	In response to R01089/04, R01089/05 and R01089/07

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			<p><del>(a)</del> <u>Directing vulnerable land uses away from areas of high flood risk. Requiring</u>  <del>Development on land that is at risk of flooding as identified in the Council's SFRA</del>  <u>must to comply with the Sequential Test and (where appropriate) the Exceptions Test,</u>  <u>as set out in the NPPF and accompany Technical Guidance. For the purpose of the</u>  <u>sequential and exceptions test, land identified in the SFRA as being subject to surface</u>  <u>water flooding, shall be treated as if in Flood Zone 3a.</u></p> <p><del>(b)</del> <u>Requiring a site specific Flood Risk Assessment to be provided with development</u>  <u>on:</u></p> <ul style="list-style-type: none"> <li><u>i Sites of one hectare or greater in Flood zone 1 (low probability);</u></li> <li><u>ii All new development (including minor development and changes of use) in</u>  <u>flood zones 2 (medium probability) and flood zone 3 (high probability);</u></li> <li><u>iii Land within flood zone 1 which has critical drainage problems (as notified by</u>  <u>the Environment Agency); and</u></li> <li><u>iv Land identified within the Council's Strategic Flood Risk <u>Assessment</u> as being</u>  <u>subject to surface water flooding</u></li> </ul> <p><del>(c)</del> <u>Requiring <del>incorporating</del> flood <u>resistant and flood</u> resilient measures <u>to be</u></u>  <u>incorporated into the design of new buildings in areas prone to flooding in accordance</u>  <u>with the recommendations of the SFRA. Measures used should be informed by a site</u>  <u>specific Flood Risk Assessment, but could include raising floor levels and power</u>  <u>sockets, and the provision of safe access and egress points in the event of a flood."</u></p> <p><del>(d)</del> <u>Utilising Sustainable Drainage Systems (SuDS) in line with the drainage hierarchy,</u>  <u>unless inappropriate, to achieve a greenfield run-off rate where feasible. <u>Where</u></u></p>	

Modification Number	Page	Para/ Policy/ Section	Detail of Modification	Source/ Reason of Modification
			<p><u>possible, SuDS should also be designed to deliver other benefits, such as improved water quality, and enhancing biodiversity.</u></p> <p><i>(ef) Resisting development involving the paving over of front and rear gardens unless appropriate permeable surfaces and drainage channels are used to minimise surface water run-off;</i></p> <p><i>(fg) Resisting the further culverting of watercourses and building over culverts. All developments on sites with existing culverts should seek opportunities to de-culvert these streams to reduce flood risk and provide conservation benefits; <del>and</del> <u>Where deculverting is financially viable but is impractical, or would be of little environmental value, the Council will seek a financial contribution toward other relevant projects for the enhancement or deculverting of other sections of the waterway;</u></i></p> <p><i>(gh) Resisting development that poses unacceptable risk to the quality of the water catchment, ground water or surface water. Development adjoining water courses or which contains a watercourse within the site boundary should maintain a minimum 8 metre wide (riparian) buffer free of development from the top of the bank of the water course and include measures to enhance the environment of the water course wherever possible.</i></p> <p><i><u>(i) Resisting developments that would compromise the function of flood defence infrastructure identified in the SFRA.</u></i></p>	
MM45	84	Para 4.6.1	Amend paragraph 4.6.1 to read:	In response to R01089/13

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			<p><i><u>“Developing in areas at risk of flooding can increase the risk on and off site. In addition to the increased footprint, <del>being at risk of flooding, buildings and other forms of development can contribute towards flooding in the first place. They can do this by replacing</del> naturally vegetated land with hard, impermeable surfaces <u>can increase the burden on surface watercourses, culverts and drainage systems which can increase flood risk. Developments should aim to maximise floodplain storage through use of green infrastructure and sustainable drainage measures. There should be no net loss in floodplain storage, or in exceptional circumstances, providing adequate off site compensatory storage on a level for level basis. Overland flow routes should not be obstructed”</u>. <del>that increase the rate of runoff and by altering the pattern of drainage. Forcing natural water courses into artificial channels and culverts frequently adds to these problems.”</del></u></i></p>	
MM46	86/ 87	Policy LP22 and Para 4.9.5	<p>Amend criteria (f), (h), (i), (k) and (l) of Policy LP22 as follows:</p> <p><i><del>“f) Working</del> in partnership with TfL and bus service providers to increase the number of routes in the borough, improving the frequency and efficiency of the bus network and ensure integration of night bus services with all night Underground services;</i></p> <p><i><del>h) Require major development to provide Green</del> Travel Plans to demonstrate <u>what measures will be introduced to ensure that</u> <del>how</del> the future users of developments will be less reliant on private motor vehicles, and promote sustainable forms of transport such as walking and cycling.</i></p> <p><i><del>i) Resist new development that results in an unacceptable adverse impact on traffic congestion within the Local and Strategic Road Network <u>at key junctions and links</u> or</del></i></p>	In response to R01213/15, and Inspector’s Issue 8, q. (vi) and (vii) (document CED029), and consistency

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			<p><i>public transport system unless it incorporates effective mitigation measures, <u>as listed in the Transport Assessment Supplementary Technical Note (2017)</u></i></p> <p><i>k) Require new development to provide a <del>Service Management Plan</del> <u>Servicing and Delivery Plan</u> to ensure that development can be adequately serviced within the site, to encourage shared servicing arrangements and <del>timing</del> <u>consolidation</u> of deliveries.</i></p> <p><i>l) Require major development to provide a <u>Construction Logistics Plan</u> <del>Construction Management Plan</del> to particularly demonstrate how it will manage trips generated <u>throughout the demolition and construction programme</u>". <del>through its construction phase</del>"</i></p> <p>Include a new paragraph after paragraph 4.9.5 as follows:</p> <p><u>"Vehicular Transport</u></p> <p><u>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.</u></p> <p><u>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</u></p>	

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			<p><u>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.</u></p> <p><u>Appendix C of the Technical Note includes a map showing the junctions and links and corresponding mitigation potential categories."</u></p>	
MM47	90	Para 4.12.1	<p>Add the following sentence to the end of para 4.12.1:</p> <p><u>"The Council will therefore resist any development that does not satisfy its servicing demands within its own site".</u></p>	In response to R01213/24
MM48	91	Policy LP23 and Para 4.13.3	<p>Amend Policy LP23 wording and order as follows:</p> <p><i>"1. The Council will ensure new development provides sufficient cycle and car parking by:</i></p> <p><i>(a) Seeking new development to meet the minimum and maximum parking standards set out in <del>Appendix 7</del> <u>the London Plan</u>. 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></p> <p><i>i Transport Assessment, which indicates adherence to <del>Green Travel Plan</del> <u>planning</u> measures and contribution to local sustainable transport schemes;</i></p>	In response to R01213/26, R01213/26a, Inspector's Issue 8, q. viii) (document CED029), and for consistency

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			<p><i>ii Levels of public transport accessibility; and</i></p> <p><i>iii Availability of public <u>on-street</u> parking and the outcomes of any parking stress survey.</i></p> <p><i>(b) Providing parking spaces for servicing and delivery vehicles in new development-;</i></p> <p><del><i>2. (c) Supporting residential development within Growth and Investment Areas that are in close proximity to public transport nodes to be low parking development <u>in line with London Plan standards</u> <u>the standards set out in Appendix 7</u></i></del></p> <p><del><i>3 Where development proposals involve a reduction of existing off-street car parking, the developer will be required to:</i></del></p> <p><del><i>(a) Demonstrate that sufficient parking will remain in the area to serve local needs; or</i></del></p> <p><del><i>(b) Provide an appropriate temporary facility and to ensure that development ultimately provides for existing local need, together with the increase in demand arising from the development.</i></del></p> <p><i>4 d) Seeking non-residential development that includes over twenty spaces to provide at least 5% (or 2 car parking spaces - whichever is the greater) of all car parking must be reserved for use exclusively by people with disabilities and in possession of a blue badge;</i></p> <p><del><i>5 e) Seeking new development to provide 20% of car parking spaces accessible to electric charge points for the use of electric and hybrid vehicles;</i></del></p>	



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			<p><del>6. f)</del> <u>Requiring secure accessible and sheltered cycle parking in accordance with the London Plan; and</u></p> <p><del>7. g)</del> <u>Requiring Regular car parking spaces <del>should</del> to achieve a minimum size of 4.8m by 2.4m. Those intended for use by disabled people should be at least <u>6m by 3.6m</u> <del>4.8m by 2.7m</del>; and</u></p> <p><del>8. h)</del> <u>Seeking to provide spaces for car clubs and car pools.</u></p> <p><del>3. 2.</del> <u>Where development proposals involve a reduction of existing off-street car parking, the developer will be required to:</u>  <u>(a) Demonstrate that sufficient parking will remain in the area to serve local needs; or</u>  <u>(b) Provide an appropriate temporary facility and to ensure that development ultimately provides for existing local need, together with the increase in demand arising from the development.”</u></p> <p>Also delete cycle parking standards from “standards for residential development” table in Appendix 7 (page 176)</p> <p>Amend paragraph 4.13.3 as follows:</p> <p><i>“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. <del>in new residential development in areas with lower levels of PTAL. The provision of</del></i></p>	

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			<p><u>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.”</u></p>	
MM49	93	Para 4.14.3	<p>Amend and split paragraph 4.14.3 as follows:</p> <p><i>“Improving local air quality, mitigating the impact of development on air quality and reducing exposure to poor air quality is vital in safeguarding public health and the environment. The focus of <u>Policy LP24</u> is to mitigate the impact of development on air quality and other pollutants, and to ensure exposure to poor air quality is reduced in the borough. <u>The Council seeks to neutralise the impact of major development schemes, and the cumulative impact of smaller developments on air quality, as well as the impact of air pollution originating from specific sources or areas within the borough. It is important that development likely to have a negative impact on air quality can be fully assessed and measures taken to make it acceptable, particularly in parts of the borough where air quality is or likely to be a concern.</u></i></p> <p><i>The whole of Redbridge is an Air Quality Management Area (<u>AQMA</u>) and the Council <del>has therefore produced an</del> is currently reviewing and updating the <u>Redbridge Air Quality Action Plan (2007)</u> that sets out how it intends to improve air quality and work towards complying with the Government’s air quality objectives. <u>Proposals for major development and development likely to have a negative impact on air quality must demonstrate that it is compliant with requirements set out in the Air Quality Action Plan and does not impede or encumber its aims and objectives.”</u></i></p>	<p>In response to Inspector’s supplementary question on air quality (CED051) and to reflect discussion during Day 8 of the hearing sessions.</p>

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MM50	93/ 94/ 95	Policy LP24, Paras 4.15.1- 3, and 4.17.5	<p>Rephrase Policy LP24 criteria (a-c) to read:</p> <p><b><u>“Air Pollution</u></b></p> <p><i>a) Seeking major new development to be at least “air quality neutral”;</i></p> <p><i>b) Requiring an Air Quality Assessment for development <u>consisting of 10 or more new homes, where:</u></i></p> <p><i>i. It is likely to have a significant and harmful impact on air quality (i.e. it will increase pollutant concentrations <u>outlined in the Council’s Air Quality Action Plan and annual Air Quality Status Reports</u>) either through the operation of the proposed development or trip generation arising from the development;</i></p> <p><i>ii. It is located in an area of poor air quality, <u>including the following Air Quality Focus Areas, identified by in the Council’s <del>Community Protection Team</del> Air Quality Action Plan:</u></i></p> <ul style="list-style-type: none"> <li>▪ <u>A12 Eastern Avenue at Wanstead (east and west of Tunnel)</u></li> <li>▪ <u>Ilford A123 and Ilford Hill</u></li> <li>▪ <u>A12 Eastern Avenue from Redbridge to A12/Aldborough Road</u></li> <li>▪ <u>Hermon Hill</u></li> </ul> <p><i>iii. Demolition or construction phases <u>for development</u> will have a significant impact on the local environment (i.e. through fugitive dust and exhaust emissions <u>from non-road mobile machinery</u>); and</i></p>	<p>In response to R01089/15, R01089/17, R01089/19, R01089/21, R01211/01, Inspector’s supplementary question on air quality (CED051), and to reflect discussion during Day 8 of the hearing sessions.</p>

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			<p><i>iv. The development prevents the implementation of measures in the Air Quality Action Plan.</i></p> <p><i>c) Seeking air quality assessments to include an emissions assessment <u>that takes into account Air Quality Action Plan objectives and emissions targets, and current baseline data for pollutants set out in the annual Air Quality Status Reports for the Redbridge AQMA. particularly for</u> <u>Where assessments show development is likely to have a negative impact on air quality, a mitigation plan will be required, planning permission will be refused where air quality exposure is not reduced to acceptable levels.</u> <del>and</del> <u>Developments proposing Combined Heat and Power (CHP) or biomass This must demonstrate compliance with the Mayor of London’s emissions limits for CHP and biomass;</u>”</i></p> <p>Rephrase criteria (f) to read:</p> <p><i><u>“reducing the runoff of particulates and other forms of biological and chemical pollution to waterways through sustainable drainage and pollution prevention methods such as incorporation of oil interceptors.”</u></i></p> <p>Rephrase criteria (j) to read:</p> <p><i><u>“Resisting development involving floodlights or other external forms of lighting (including flashing lights) that would unacceptably impact on the amenity of nearby occupiers at unsocial hours, biodiversity, including protected species and the ecology of watercourses, or be likely to distract drivers on the public highway.”</u></i></p>	

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			<p>Insert new policy point (l) to read:</p> <p><u><i>“(l) Requiring proposals for waste facilities to adequately mitigate their impact on amenity, air quality, noise and other relevant environmental considerations by fully enclosing the facility.”</i></u></p> <p>Insert additional point (m) to read:</p> <p><u><i>“(m) Requiring that major new developments demonstrate through liaison with Thames Water that sufficient capacity exists within the sewerage and drainage network to serve the proposed development, and where necessary, that capacity upgrades will be secured.”</i></u></p> <p>Insert additional implementation point as follows:</p> <p><u><i>“2. In order to help mitigate the impact of development on air quality within the borough the Council will implement actions set out in the Air Quality Action Plan schedule of actions relating to ‘emissions from development and buildings’.”</i></u></p> <p>Amend paragraphs 4.15.1 - 4.15.2 as follows:</p> <p><u><i>“4.15.1 <del>The Council will require Air Quality Assessments (AQA) where any of the following apply.</del> The Council will seek an air quality assessment on developments of 10 or more units. There may be cases where an assessment would not be required, but much will depend on individual site circumstances and the nature and scale of</i></u></p>	

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			<p><u>development proposed. The Council is mindful of the cumulative impact of development in the borough and will therefore seek to ensure that all proposals adequately address air quality issues.</u></p> <p><u>4.15.2 The Council will also seek assessments for development in areas of poor quality, in particular those areas stated in the policy as Air Quality Focus Areas. These are areas in locations that have been identified as having high levels of pollution and human exposure, where the Council is particularly committed to reducing emissions. The list of four Focus Areas shows that they are at major roads in the borough, and the Council will prioritise these areas when developing and implementing actions listed in the Air Quality Action Plan wherever relevant, and will work with TfL in delivering measures to improve air quality.</u></p> <p><u>4.15.23 Air Quality Assessments must outline the predicted and forecast pollutant concentrations at the proposed development, and the planned mitigation measures, and demonstrate that the development does not impede the progress of objectives outlined in the Council's Air Quality Action Plan, or weaken daily or annual average emissions outlined in annual Air Quality Status Reports for the Redbridge AQMA. The Council will also consider wider cumulative impacts on air quality arising from a number of smaller developments. In order to help reduce air pollution and adhere to London Planning policy, developments must demonstrate that they comply with Policy 7.14 of the London Plan (to be at least air quality neutral)."</u></p> <p>Insert new paragraph 4.17.5 to read:</p> <p><u>"In addition to meeting the requirements of the East London Waste Plan (Joint Waste</u></p>	

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			<p><u>Development Plan 2012), it is important that new waste facilities give full consideration to their potential impact on the local environment. To mitigate against potential adverse impacts, including to safeguard against pollution from waste fires, the Council will seek that waste storage and treatment facilities are fully enclosed.”</u></p>	
MM51	96	Policy LP25 and Para 4.18.2	<p>In Policy LP25, insert new sub-heading and text after criteria (h) as follows:</p> <p><b>“Digital Infrastructure</b></p> <p><u>2. The Council will promote the development of advanced, high quality communications infrastructure to support economic growth and more accessible, inclusive communities. Developments should facilitate high speed broadband and advancement in communication networks where possible.”</u></p> <p><del><u>This will be achieved by requiring new development proposals to:</u></del></p> <p><del><u>Be designed in such a way as to be capable of facilitating delivery of high speed broadband technology; and</u></del></p> <p><del><u>Deliver “ultrafast” connections in Investment and Growth Areas.</u></del></p> <p>Insert new point under Implementation section as follows:</p> <p><u>“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.”</u></p> <p>Insert new supporting text (as new para 4.18.2) to read:</p> <p><u>“The NPPF requires the Council to facilitate telecommunications development,</u></p>	Council update to recognise changes to telecommunications industry, to facilitate digital infrastructure, then updated in response to Inspector’s Issue 8, q. x) (document CED029)

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			<p><u>including high speed broadband technology as essential for sustainable economic growth and in enhancing the provision of local community facilities and services, while ensuring as far as possible that any visual impact of the structure on valued features of the borough’s environment is minimised.</u></p> <p><u>Where planning permission is required for telecommunications, the Council is keen to minimise any adverse impact of such development on visual amenity, aural amenity, and on public safety including movement without restricting its provision. All applications for development are encouraged to consider, along with all relevant telecommunications operators, how the telecommunications needs of the occupiers will be met. Sensitive and innovative design and integration/dual use will be required to reduce impact, to minimise street/skyline clutter and the proliferation of infrastructure on top of or attached to buildings or structures.”</u></p>	
MM52	98/ 101	Policy LP26, Paras 5.1.13 – 5.1.14	<p>Amend the first two paragraph of Policy LP26 as follows:</p> <p><u>“1. 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. 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.</u></p>	In response to R01218/14, Inspector’s Issue 9, q. (i) and (xi) (document CED030), and discussion during Day 9 of the hearing sessions.



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			<p><i><u>2. The Council will promote high quality design in the borough by requiring that development:</u></i></p> <p>Amend criteria (c) – (e) as follows:</p> <p><i><u>“(c) <del>conserves and preserves</del> enhances the <del>special</del> character and significance of the historic environment and complements the borough’s heritage assets, and their settings, in accordance with LP33;</u></i></p> <p><i><u>(d) Is well integrated <del>to a high degree of compatibility with the surrounding area, and</del> 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;</u></i></p> <p><i><u>(e) Incorporates sustainable design and durable construction, observing best practice in energy efficiency and climate change mitigation, and <del>is</del> incorporates the highest standards of accessible and inclusive design that is <del>and</del> adaptable to different activities and land uses and the changing needs of all, including disabled and older people;</u></i></p> <p>Modify criteria g) as follows:</p> <p><i><u>“(g) <del>Responds correctly to, and is completely integrated with</del> 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</u></i></p>	

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			<p><i>that improve legibility and movement through places, and positively contribute to street frontages;”</i></p> <p>Delete criterion j) as follows:</p> <p><del><i>(j) Provide an appropriate level of amenity for buildings, as outlined in LP29;</i></del></p> <p>Re-label criteria (k) – (o) as (j) – (n)</p> <p>Reword criteria (m) of LP26 as follows:</p> <p><del><i>(m) Protects the amenity of neighbouring occupiers by not causing overshadowing, loss of sunlight, unreasonable noise and disturbance, overlooking or loss of privacy, and respects having respect for the scale, massing and height of surrounding buildings.</i></del></p> <p><u><i>“(l) does not result in an adverse impact upon the amenity of neighbouring occupiers in relation to overlooking and privacy, daylight/sunlight, outlook, noise and vibration; and respects the scale, massing and height of surrounding buildings”</i></u></p> <p>Insert the following to the end of paragraph 5.1.13:</p> <p><u><i>“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.</i></u></p>	

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			<p><u>Policy LP30 provides additional guidance in relation to household extensions.”</u></p> <p>Insert new sub-heading and additional text after paragraph 5.1.14 as follows:</p> <p><u>“Access and Inclusive Design</u></p> <p><u>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.”</u></p>	
MM53	101	Policy LP27	<p>Amend Policy LP27 as follows:</p> <p><u>“1. As part of a strategy to adopt a plan-led approach towards overall growth in the borough, planning applications for the development of Tall and Large Buildings will be supported in the following Tall Building Zones, as identified on the Local Plan Policies Map:</u></p> <p><u><del>1. (a) Ilford Metropolitan Town Centre in Investment Area One and Growth Area;</del></u>  <u><del>2. (b) East Ilford, Seven Kings District Local Centre, and Goodmayes District Local Centre, in the Crossrail Corridor Investment and Growth Area Areas Two; and</del></u></p>	<p>In response to R01208/01, R01089/22 and R01218/17 and in response to Inspector’s Post Hearing Advice Part 1 (IED011)</p>

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			<p><del>3.-(c) Gants Hill District Centre in Investment and Growth Area. Area Three</del></p> <p><del>2. -Outside of these areas p-</del>Planning applications for tall and large buildings will only be considered <del>in areas of intensification, such as</del> <u>on sites in Investment and Growth Areas, and in centres that:</u></p> <p><del>i.-(a) Which have good public transport;</del>  <del>ii.-(b) Where the character of the surrounding area would not be harmed or adversely affected by the scale, mass or height of the building;</del>  <del>iii.-(c) and</del> <u>Where it relates well to the urban layout, streets, open spaces, <u>heritage assets</u> and public realm of the surrounding area; and</u>  <del>iv.-(d) Where the proposals make a significant contribution to local regeneration.</del></p> <p><u>3. All proposals for tall and large buildings in all parts of the borough will be assessed against the design criteria set out in <u>Local Plan Policy LP26, as well as criteria set out in London Plan Policy 7.7,</u> and <u>should:</u> <del>attention paid in particular to</del></u></p> <p>a) <del>how the building integrates</del> <u>integrate well with</u> the site and surroundings, in terms of how buildings fit in with the street, and how they affect the <u>day and night time skyline;</u></p> <p>b) <u>relate well to</u> the architectural and historic context of the surrounding area of the building, and <del>the effect it has</del> <u>not impact adversely on heritage assets and their settings;</u></p> <p>c) <u>not impact adversely on</u> <del>the relationship between the building and</del> the views <u>having regard to the</u> <del>and</del> natural topography of the area;</p> <p>d) <u>not impact adversely on</u> <del>the overshadowing effect the building has on other</del></p>	

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			<p><i>buildings, public spaces, <del>and</del> open spaces, <u>and watercourses, by reason of overshadowing;</u></i></p> <p><i>e) <del>the contribution a building makes to</del> <u>contribute to improving</u> way-finding, pedestrian permeability and improved access for the public;</i></p> <p><i>f) <u>incorporate</u> the highest standards of architecture and materials, including sustainable design and construction practices; <del>and</del></i></p> <p><i>g) <del>the incorporation of</del> <u>incorporate</u> an appropriate public realm setting and ground floor active uses.</i></p> <p><i>h) <u>Ensure effective management regimes for the continued maintenance of the building and shared areas etc.</u></i></p> <p><i>i) <u>Use the highest standards of design and construction for redeveloped and refurbished tall buildings</u></i></p> <p><i><u>4. Tall and large buildings will also be assessed against <u>all</u> other relevant policies within the Local Plan in relation to <u>high quality design, mixed use development, amenity and internal space standards, built conservation of the historic environment, renewable energy and sustainability sustainable design and construction, parking standards, water and flooding, and infrastructure for high speed broadband.</u></u></i></p> <p><i><u>5. Planning applications for the development of Tall Buildings will be required to contain an urban design analysis that demonstrates a design strategy for the building that meets criteria in LP26, and the criteria set out in this policy.</u></i></p> <p><b>Implementation</b></p> <p><i>1. The Council will update the Urban Design Framework (2004) in the light of</i></p>	

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			<p><i>changes in national, regional and local policy and to take account of the Redbridge Urban Characterisation Study (2014).</i></p> <p>2. <i>The Council will promote good design and ‘front-loading’ by encouraging:</i></p> <ul style="list-style-type: none"> <li>• <i>Use of its pre-application service</i></li> <li>• <i>Developer-led public engagement ahead of application submission, and</i></li> <li>• <i>Design review of appropriate major schemes.</i></li> <li>• <i>The Council will develop master plans for major opportunity sites within the Investment Areas.</i></li> </ul> <p>3. <i>Incorporate up to date guidance on Tall Buildings in the Ilford Framework for Growth SPD.</i></p> <p>4. <u><i>The Council will review its Local Validation Checklist to include additional application requirements for tall and large buildings. Such documents will include assessments for lighting, wind-tunnelling and microclimate.”</i></u></p>	
MM54	102	Paras 5.2.3 - 5.2.4, 5.27-5.2.9 and 5.2.12	<p>Edit supporting text to Policy LP27 Tall Buildings as follows:</p> <p>Insert to beginning of paragraph 5.2.3:</p> <p><u><i>“In line with the London Plan (2016) tall and large buildings are those that are substantially taller than their surroundings, cause a significant change to the skyline, or are larger than the threshold sizes set for the referral of planning applications to the Mayor.”</i></u></p> <p>Insert to end of paragraph 5.2.3:</p>	Council - clarity

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			<p><u><i>“When considering the impact of planning applications for tall or large buildings in specific areas, it is important to have an awareness of context and how a particular proposal fits into its location.”</i></u></p> <p>Delete paragraph 5.2.4 in its entirety as follows:</p> <p><del><i>“5.2.4 When considering the impact of planning applications for tall or large buildings in specific areas, it is important to have an awareness of context and how a particular proposal fits into its location. Whilst definitions of tall buildings are useful, defining such buildings as being at or above a particular height, such as 30m or over, is not always helpful, as this may be considered too tall in some locations but not tall in others. London Plan Policy 7.7 ‘Location and Design of Tall and Large Buildings’, contains a helpful definition for tall buildings that could be suitably applied to all locations in order to identify buildings as tall for their location. It states that, “Tall and large buildings are those that are substantially taller than their surroundings, cause a significant change to the skyline, or are larger than the threshold sizes set for the referral of planning applications to the Mayor.”</i></del></p> <p>Delete paragraph 5.2.7 as follows:</p> <p><del><i>“5.2.7. Tall Building Zone designation has worked well in terms of bringing major development schemes forward that progress the drive for growth, and improve the built environment within the centre, the most notable example being Pioneer Point at Winston Way.”</i></del></p> <p>Edit last sentence of paragraph 5.2.8 as follows:</p> <p><i>“5.2.8 .....This indicates that as a regional Opportunity Area Ilford is considered as</i></p>	

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			<p><i>suitable for tall buildings. and accordingly, the Council has retained Tall Building designation in Ilford Metropolitan Centre, and identified the area as such on the Local Plan Policies Map."</i></p> <p>Delete last sentence of paragraph 5.2.9 as follows:</p> <p><i>"The Tall Building Zones in this part of the borough have been effectively implemented in terms of attracting appropriate development to the right locations, and keeping them to the right height and scale."</i></p> <p>Edit final two sentences of paragraph 5.2.12 as follows:</p> <p><i>"5.2.12 ... The Council will undertake further work on tall buildings to identify the appropriate location for tall buildings elsewhere in the borough. outside of the Tall Building Zones identified in LP27. This work will inform future planning brief work for specific sites."</i></p>	
MM55	105	Policy LP28	<p>Amend policy wording to read as follows:</p> <p><b><i>"LP28: Advertising and Shop Fronts</i></b></p> <p><i>1 The Council will support signage in designated town centres and key retail parades that: <del>where ensure that shopfronts and signs placed on buildings respect the overall character and appearance of the building and the street scene generally by:</del></i></p> <p><i>(a) <u>Supporting signage in designated town centres and key retail parades where the premises concerned are not in a Conservation Area. Ensure that shopfronts and signs placed on buildings respect the overall character and appearance of the building and the street scene; Outside of these locations, advertisements will generally not be</u></i></p>	<p>In response to R01181/07 and updated in response to Inspector's Issue 9, q. iii) (document CED030)</p>



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			<p><del>supported unless it can be demonstrated that they are necessary for the use of the premises on which they are located</del></p> <p><u>(b) Demonstrate in 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;</u></p> <p><del>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.</del></p> <p>2 <del>Where</del> <u>For proposals are to be acceptable in principle the following criteria should be taken into consideration: requirements should be adhered to:</u></p> <p>a) <del>Supporting advertisements that</del> <u>Advertisements should</u> respect the design of the building on which they are erected and the character and amenity of the surrounding area;</p> <p>b) <del>Requiring advertisements where the</del> <u>The scale, colour, materials, content, illumination and siting of an advertisement are</u> <u>should be appropriate to its their</u> location;”</p> <p>c) <del>Supporting f</del> <u>Fascia signs and projecting signs which should</u> respect the architectural and design features of the host building. <del>are must be of an appropriate height relative to overall height of the shop front, and not intrude above ground floor levels. Projecting signs should be fixed at fascia level; and 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</del></p>	

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			<p><del>consent;</del></p> <p>d) <del>Only supporting</del> Large poster hoardings <del>where they should</del> 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.</p> <p>e) <del>Only supporting</del> s Small poster panels <del>where should:</del></p> <p style="padding-left: 40px;"><del>i. Their position clearly relates</del> <u>Relate</u> to an existing building <del>or its forecourt and does</del> not detract from the appearance of a street;</p> <p style="padding-left: 40px;"><del>ii. Their size is</del> <u>Be in proportionate</u> to the site and surrounding area; and</p> <p style="padding-left: 40px;"><del>iii. Their design and appearance does n</del> <u>Not</u> detract from the character and amenity of the surrounding area.</p> <p>f) <del>3</del> The Council will <del>Resisting</del> <u>resist</u> advertisements that:</p> <p style="padding-left: 20px;"><del>iv a)</del> <u>Obscure</u> or are likely to be confused with traffic signs or signals; and</p> <p style="padding-left: 20px;"><del>v b)</del> <u>Impede</u> the visibility or distract the attention of drivers or pedestrians at any access road, junction or point where special care is needed.</p> <p><u>All advertisements should be maintained in a condition that does not threaten public safety in any way.</u></p> <p><del>34</del> The Council will support shopfronts that:</p> <p style="padding-left: 20px;">a) <u>Respect</u> the overall character of the building on which they are located;</p> <p style="padding-left: 20px;">b) <u>Add</u> interest to the shopping parade in which they are located and help stimulate a vibrant pedestrian street scene;</p> <p style="padding-left: 20px;">c) <u>Are</u> wheelchair accessible;</p> <p style="padding-left: 20px;">d) <u>Utilise</u> <del>ing</del> appropriate lighting and security shutters so that they do not become dark and unwelcoming frontages at night. <del>Generally the Council will refuse internally</del></p>	

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			<p><del>lit signs and solid shutters unless the proposal can be justified, e.g. for specific security reasons; and</del></p> <p>e) Demonstrate that where cash machines, serving windows or other additions to shopfronts are proposed which could lead to customers queuing outside the shop, the public footpath is wide enough to accommodate this without undue interference with pedestrian flows or giving rise to safety concerns over pedestrian/vehicular conflict.”</p>	
MM56	106	Policy LP29	<p>Amend part (1) of Policy LP29 as follows:</p> <p><i>“1 The Council will ensure that new development will provide external private and/or communal amenity space to meet the needs of occupants by:</i></p> <p><i>(a) Seeking a minimum amount of <u>private amenity space</u> <del>of:</del></i></p> <p><i>For <del>1 and 2 bed dwellings</del> <u>flatted development:</u></i></p> <p><i>i <del>15sqm</del> <u>15sqm</u> of private amenity space for 1-2 person <del>per dwelling without a balcony, for development within town centres and tall building zones;</del></i></p> <p><i>ii <u>an additional 15sqm for each additional occupant</u></i></p> <p><i><del>of private amenity space per dwelling with a balcony in excess of 5sqm for development within town centres and tall building zones;</del></i></p> <p><i>For <del>3 and 4+ bed dwellings/flats</del> <u>new housing development:</u></i></p> <p><i>i <del>5020sqm</del> <u>20sqm</u> of private amenity space per dwelling <u>for 1 and 2 bed units and for houses containing 3 or more bedrooms an additional 10 sqm per additional bedroom</u> <del>without a balcony, for development within town centres and tall building zones;</del></i></p> <p><i>ii <del>5sqm</del> <u>5sqm</u> of private amenity space per dwelling with a balcony in excess of <del>8sqm</del> <u>5sqm</u> for development within town centres and tall building zones;</i></p> <p><i>(b) Seeking a minimum amount of <u>communal amenity space</u> of <del>520sqm</del> <u>20sqm</u> of <del>private</del> <u>per</u></i></p>	In response to R01217/10 and Inspector’s Issue 9. Q. iv (document CED030)

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			<p><del>habitable room per unit for flatted development from development outside of town centres and tall building zones; and 5 sqm per unit for housing schemes greater than 50 units.</del></p> <p><i>(c) Seeking a minimum 12sqm appropriate scale of private amenity space per habitable room in specialised housing; depending upon end user requirements and the location sensitivities of the scheme.</i></p> <p><u><i>(d) Seeking for all development with an additional estimated occupancy of ten children or more, communal play provision of 10 squares metres for each child predicted to occupy the development in accordance with the Mayor’s Play and Informal Recreation SPG (or any successor document); and,</i></u></p> <p>And amend implementation section of Policy LP29 as follows:</p> <p><b>“Implementation</b></p> <p><i>1 The Council will update <del>the Amenity Space and Residential Development SPG (2005) in the light of changes in national, regional and local policy and to take account of the Redbridge Urban Characterisation Study (2013) to inform consideration of amenity space in new development. The regular review of the Characterisation Study SPD will provide further detail with respect to the quality and quantity of amenity space in new residential development.</del>”</i></p>	
MM57	109	Policy LP30	Amend Policy LP30 criteria 1c to read:	In response to Inspector’s Issue 9, q. v)

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			<p><del>“(c) <u>It</u> incorporates a roof profile and materials sympathetic to the existing dwelling;”</del></p> <p>Amend criteria 1g to read:</p> <p><i>“(g) Maintains or improves the appearance of the locality or street scene;”</i></p> <p>Delete section 2 of LP30:</p> <p><del>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:</del></p> <p><del>a) Any part of the submission requirements for Prior Approval applications, as outlined on the Council’s planning website, have not been satisfactorily met</del></p> <p><del>b) Following submission of a Prior Approval application the proposed development does not meet with Class A of the Town &amp; Country Planning (General Permitted Development) Order 2015</del></p> <p><del>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</del></p> <p><del>d) Following the completion of neighbourhood consultation, further information regarding the proposed development requested by the Council is not submitted within 10 working days.</del></p> <p><del>Such information as required for criteria c and d above may include site photography and details of matching materials.</del></p>	<p>(document CED030), and consistency</p>

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			<p><del>Further to the above:</del></p> <p><del>i. Any Prior Approval given will be subject to other requirements being met, for example Building Regulations and Party Wall agreements.</del></p> <p><del>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</del></p> <p><del>iii. The proposed development must be completed on or before 30 May 2019.</del></p>	
MM58	111	Policy LP31	<p>Rephrase and renumber Policy LP31 wording as follows:</p> <p><u>"1. For domestic and commercial properties, the Council will only support basement and subterranean development involving further excavation of land that:</u></p> <p><u>1(a) Is wholly confined within the curtilage of the application property and designed to maintain and safeguard the structural stability of the application building and nearby buildings;</u></p> <p><u>2(b) Does not comprise of more than one storey, or be under an existing basement, subject to the findings of a Basement Impact Assessment (BIA);</u></p> <p><del>3(c) Is not built under an existing basement;</del></p> <p><u>4(c) Does not extend into or underneath the rear garden, from the principal rear wall, to a depth of more than 50% of the garden, and to the front of the property to a depth of more than 30%;</u></p> <p><u>5(d) Includes a sustainable urban drainage scheme, including 1.0 metre of permeable soil depth above any part of the basement beneath a garden;</u></p> <p><del>6(e) Does not cause loss, damage or long term threat to trees of townscape or</del></p>	<p>In response to Inspector's Issue 9, q. vi) (document CED030), and consistency</p>

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			<p>amenity value;</p> <p><del>7(f)</del> Ensures that any externally visible elements such as light wells, roof lights and fire escapes are sensitively designed and sited to avoid any harmful visual impact on neighbour or visual amenity;</p> <p><del>8(a)</del> Does not have an adverse impact on drainage, flooding from all sources, groundwater conditions and the structural stability of the host property or neighbouring properties. The Council will only support developments that:</p> <ul style="list-style-type: none"> <li>i do not cause harm to the built and natural environment and local amenity;</li> <li>ii do not result in flooding or ground instability; and</li> <li>iii do not threaten mature trees through changes to hydrological conditions or the severance of tree roots.</li> </ul> <p><del>9(h)</del> Includes a Basement Impact Assessment (BIA), <u>appropriate to the scale of the proposal that carries out assesses geotechnical, structural engineering and hydrological investigations impacts.</u> <del>The assessment should also include modelling to ensure that basement developments will not harm the local environment and local amenity.</del></p> <p><del>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.</del></p>	
MM59	112	Policy LP32	<p>Insert new criteria 3(d) to Policy LP32 to read:</p> <p><u>“(d) minimising water consumption in accordance with the London Plan by incorporating water saving measures and equipment into new developments, and</u></p>	In response to R01089/24, R01089/25, and Inspector’s Issue 9, q. (vii) and (viii)

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			<p><u>designing residential development so that <del>main</del> water consumption does not exceed <del>105</del> 110 litres per head per day”</u></p> <p>And amend existing criteria (d) and (e) as follows:</p> <p><del>“(d) applying measures to mitigate dwelling overheating; and</del></p> <p><del>(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.”</del></p> <p>Modify policy points 4(a) as follows:</p> <p><del>(a) <u>Seeking that where viable, domestic refurbishment works requiring planning permission meet BREEAM ‘Excellent’ Domestic Refurbishment Scheme Ratings, including specifically within the water efficiency category. For existing development involving more than one dwelling, or where one or more dwellings are created:</u></del></p> <ul style="list-style-type: none"> <li><del>• <u>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.</u></del></li> </ul> <p><u>Seeking the achievement of BREEAM ‘Excellent’ ratings, including specifically within the water efficiency category, where viable on:</u></p> <ul style="list-style-type: none"> <li><u>• the refurbishment of non- domestic buildings</u></li> </ul>	(document CED030)



Modification Number	Page	Para/ Policy/ Section	Detail of Modification	Source/ Reason of Modification
			<ul style="list-style-type: none"> <li>• <u>new non-domestic buildings over 1000m2 in size</u></li> <li>• <u>extensions to non-domestic buildings where the proposed extension is equal to or greater than 50% of the existing building floorspace.</u></li> </ul> <p><del>(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</del></p> <p>And relabel criteria 4c as 4b.</p>	
MM60	115	Policy LP33	<p>Amend criterion 1 (d) of Policy LP33 as follows:</p> <p><i>“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, <u>unless the developer can demonstrate that the proposal achieves public benefit that outweighs any harm to or loss of the heritage asset in accordance with paragraphs 133 and 134 of the NPPF.</u>”</i></p> <p>Make changes to criteria 4 of Policy LP33 as follows:</p> <p><i>“4 Archaeology</i></p> <p><i>(a) Requiring an archaeological evaluation that proposes effective mitigation</i></p>	In response to R01218/21a and Inspector’s Issue 9, q. x) (document CED030)

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			<p><i>measures for development proposals involving significant groundwork within Archaeological Priority <del>Zones</del> Areas (as identified on the Policies Map), or in other areas with archaeological interest. <del>Advice should be taken from English Heritage and</del> <del>Provision should be made for on-site investigations that include the recording of archaeological evidence within the affected area.</del></i></p> <p><i><u>b) The Council will resist development which impacts substantially on archaeological assets of national significance</u></i></p> <p><i><u>c) Where appropriate, public interpretation, access and exhibition of artefacts will be required through appropriate planning conditions”</u></i></p> <p>Add additional point to implementation section of Policy LP33 as follows:</p> <p><i><u>“9. Where archaeological sites are identified and are considered to be nationally important, provision will be made for their preservation in-situ. Where archaeological sites are of less importance planning conditions will be used to achieve appropriate archaeological recording. Where significant archaeology is to be recorded appropriate planning conditions may be used to achieve public and community archaeology, such as site visits, school projects, popular publications and web resources.”</u></i></p> <p>Also number opening paragraph, re-label numbered sub-headings with letters, and re-label lettered criteria with roman numerals.</p>	

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MM61	122	Para 6.1.7-6.1.9	<p>Amend paragraphs 6.1.7 – 6.1.8 as follows, and renumber subsequent paragraphs accordingly:</p> <p><i>“6.1.7 The borough’s Green Belt was last reviewed in the 1990s. To inform this Local Plan, the Council undertook a number of Green Belt reviews, to assess if areas of the borough’s existing Green Belt still meet the purposes as set out in paragraph 80 of the NPPF. <del>As Figure 22 shows,</del> <del>†The 2016</del> <u>Green Belt Review and Addendum (2017)</u> identified that the following areas of the Borough’s Green Belt do not meet the NPPF purposes:</i></p> <ul style="list-style-type: none"> <li>• <i>Roding Hospital and Surrounding Area (parcels GB11b and GB11c);</i></li> <li>• <i>Claybury Hospital (parcels GB12b and GB12c);</i></li> <li>• <i>Hainault Fields (parcel GB13b);</i></li> <li>• <i>Fairlop Plain (parcel GB14b);</i></li> <li>• <i>King George and Goodmayes Hospital (parcels GB16b); and</i></li> <li>• <i>Billet Road (parcel GB14c)</i></li> </ul> <p><u>6.1.8 King George and Goodmayes Hospitals (part of parcel GB16b) and Billet Road (parcel GB14c) offer sustainable locations to help meet the boroughs development needs, and as such are identified as Development Opportunity Sites in Appendix 1.</u></p> <p><u>6.1.89 The Green Belt Assessment (2016) and Addendum (2017) However, it also identified <del>that</del> the following <del>additional</del> areas <u>where and boundary amendments are necessary to meet NPPF requirements that <del>did not meet the purposes of</del> Green Belt boundaries be defined ‘clearly, using physical features that are readily recognisable and likely to be permanent’ (NPPF, para 85):</u></u></p> <ul style="list-style-type: none"> <li>• <u>Land at Snaresbrook Crown Court (GB03)</u></li> </ul>	Council – factual corrections and clarity and in response to Inspector’s Post Hearing Advice Part 2 (IED012).

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			<ul style="list-style-type: none"> <li>• Land between Woodford Green (GB04) and Epping Forest Hatch and Woodford Golf Course (GB05);</li> <li>• <del>Land at Boundary changes are recommended within Snaresbrook Crown Court and Walthamstow Forest (GB05) and Claybury Hospital (GB0612);</del></li> <li>• <del>The area of the land within of Hainault Fields (GB13) comprising Forest Park Cemetery and Crematorium; and</del></li> <li>• <del>Land remaining within Roding Hospital (GB11) be amalgamated with Roding Valley Park (GB09)."</del></li> </ul> <p>As a consequence of this, Figure 22 to be updated to show parcels GB13B and GB14B and half of GB16B to the west of Seven Kings Water (area covering Ford Sports Ground and Seven Kings Park) as 'Green Belt Parcel's). Please see AM56 for details.</p>	
MM62	124/ 126	Policy LP35 and Para 6.2.4	<p>Rephrase Policy LP35 criteria (a) as follows:</p> <p><i>"(a) Protecting all Open Space and Play Space in the borough, as identified on the Policies Map. <u>Any, by resisting inappropriate development proposals on such space should unless:</u></i></p> <p><i>i) <del>The proposal is</del> <u>be</u> supportive of and ancillary to the purpose of that open space; and</i></p> <p><i>ii) <del>The proposal is to</del> <u>enhance the quality or accessibility of the open space."</u></i></p> <p>Amend criteria (b) to read:</p> <p><i>"(b) Enhancing the supply of Open Space to meet the needs of the borough's growing population, by seeking on-site provision of publically accessible open space, particularly in major new developments in areas of deficiency, <u>and the Strategic Sites</u></i></p>	In response to R00325/07, updated evidence base, Inspector's Issue 10, q. i) (document CED031) and discussions during Day 9 of the hearing sessions.

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			<p><u>identified in Policies LP1A - E. Provision should be in accordance with standards set out in the Council's Open Spaces Study, unless superseded, and in dense urban areas could include the use of pocket parks, green roofs, and landscaping and public realm provision . <del>Where this is impractical</del> Where open space standards cannot be met on-site, financial contributions towards improvements to existing or planned nearby spaces within reasonable walking distance of the proposed development will be sought."</u></p> <p>Delete criteria (g) as follows:</p> <p><del>"Ensuring the re-provision of playing pitches and facilities at Oakfield and Ford Sports Ground a suitable alternative location within the borough before the sites are redeveloped.</del></p> <p>Amend para 6.2.4 (as a result of modification 143) as follows:</p> <p><i>"The Council recognise that areas of significant housing and population growth such as the Ilford and Crossrail <del>Rail</del> Corridor Investment and Growth Areas are located in areas of existing deficiency. In these areas of deficiency, the Council will seek new development and other projects to help to tackle this issue by seeking onsite open space provision or contributions towards improvements. While the context of these areas will mean that it is unlikely to be able to provide extensive areas of new open space the Council will seek to create urban spaces to provide amenity and enjoyment to existing and new residents in these areas. Some development sites may be too small or restricted in other ways for this always to be practicable. Where this is the case, there is scope to apply Community Infrastructure Levy <u>or s106</u> receipts from development, to improve local parks and open spaces within the catchment of the</i></p>	

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			<p><i>development. <u>The findings of the Redbridge Open Space Study (2016) will be used to help determine where such investments should be made. This identifies accessibility standards for different types of open spaces according to their role and function; including 280m for pocket spaces, 400m for local spaces, and 1.2km for district spaces. It also identifies that in the south of the borough, Valentines Park, Seven Kings Park, Goodmayes Park, South Park, and Loxford Park all offer scope for future investment that could help them adapt to likely increased use arising from population growth.</u></i></p>	
MM63	126/ 128	Para 6.2.6, 6.2.8 - 6.2.9	<p>Amend para 6.2.6 to read:</p> <p><i><u>“The Council will seek to ensure that there is sufficient provision for children’s play in the borough. Such spaces are particularly important in areas where families do not have access to large areas of private outdoor space, such as gardens as can be the case in high density housing developments. The Council will therefore seek for such developments to make provision for children’s play space to tackle existing deficiencies, either through on-site provision, or investment in open spaces to enhance their access and functionality. The Open Space Study (2016) identifies areas of deficiency both in terms of levels of provision and access to open space, and identifies sites with scope for enhanced play provision. This will therefore be used, alongside any future updates, to inform the implementation of policy LP35.” The findings of the emerging Open Space Assessment (2016) will inform policy LP35.</u></i></p> <p>Delete paragraph 6.2.8 as follows:</p> <p><del><i>“6.2.8 However, the Council is proposing to allocate both Oakfield and the Ford Sports Ground</i></del></p>	Council - to conform with updated evidence base and in response to Inspector’s Post Hearing Advice Part 2 (IED012).

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			<p><del>as ‘Opportunity Sites’ (See Appendix 1) which are currently being used as playing pitches. The PPS tested scenarios to assess the impact of the loss of provision at these sites. The PPS found that the loss of both Oakfield and the Ford Sports Ground would result in a deficit of provision in the borough over the plan period and therefore could not be considered ‘surplus’ to requirements. Given this, in accordance with paragraph 74 of the NPPF, should redevelopment come forward on Oakfield and/or the Ford Sports Ground, “the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location”. Therefore, the Council is committed to re-providing the existing level of provision Oakfield and the Ford Sports Ground at a suitable location within the borough.</del></p> <p>And delete paragraph 6.2.9:</p> <p><del>“6.2.9 In order to demonstrate that this is feasible, the Council has undertaken an Alternative Playing Pitch Assessment (2016). This document assessed a range of sites across the borough to identify if there are feasible and deliverable alternative sites in the borough which could accommodate the re-provision of the existing level of sports pitches (and facilities) which are currently on the Oakfield Playing Fields and the Ford Sports Ground. The assessment demonstrates that there are a range of alternative, suitable and deliverable sites in the borough that have the potential to accommodate the level of existing provision at Oakfield and Fords Sports ground. In relation to Oakfield sites at Forest Road Recreational Ground and Hainault Recreational Ground have significant potential. In relation to the Ford Sports Ground, Seven Kings Park and Goodmayes Park Extension have significant potential. The Council is committed to undertaking detailed feasibility work on these sites to ensure re-provision of the sports pitches in the borough.”</del></p>	

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MM64	129	Policy LP36	<p>Number opening paragraph of Policy LP36, and amend criteria (c) to read:</p> <p><i><u>“Protecting agricultural land in the borough, in accordance with national planning policy <del>unless there are overriding community benefits to the proposal</del>”</u></i></p> <p>Modify criteria (e) of LP36 as follows:</p> <p><i><u>“(e) Supporting buildings and structures <u>that support local food growing on allotment land which do not have an adverse visual impact on the locality</u>”</u></i></p> <p>Insert additional point to implementation section of Policy LP36 as follows:</p> <p><i><u>“2. The Council will support and encourage new community food growing spaces as part of the landscape provision within residential development”</u></i></p>	In response to R01098/07, R01205/09, and Inspector’s Issue 10, q. ii) (document CED031), and consistency.
MM65	130	Policy LP37	<p>Rephrase Policy LP37(c) to read:</p> <p><i><u>“Protecting and enhancing the borough’s Blue Ribbon network, particularly supporting projects which improve water quality and biodiversity and restore parts <del>of</del> the River Roding and other watercourses, in accordance with the Thames River Basin Management Plan”</u></i></p>	In response to R01089/26
MM66	131	Para 6.4.5	<p>At end of 6.4.5 insert:</p> <p><i><u>“This will be particularly important given that some parts of the borough are currently deficient in access to open space and nature (see figures 24 and 25).”</u></i></p>	In response to R01090/42



Modification Number	Page	Para/ Policy/ Section	Detail of Modification	Source/ Reason of Modification
			Insert new figure 25: Areas of Deficiency for Nature (and renumber subsequent figures accordingly)	
MM67	134	Policy LP39	<p>Amend Policy LP39 criteria 1b to read:</p> <p><i>“(b) Protecting designated international, national and local sites of nature conservation importance including Sites of Special Scientific Interest covering parts of Epping Forest, Wanstead Flats and Hainault Forest and <u>all Sites of Importance for Nature Conservation as identified on the Policies Map</u> <del>Sites of Metropolitan Importance for Nature Conservation (SMIs) covering the River Roding and Seven Kings Water Corridors;</del>”</i></p> <p>Amend criteria 1c, d and 2 to read:</p> <p><i>“(c) Promoting the qualitative enhancement of <u>all sites of biodiversity value sites, (including the Blue Ribbon Network, designated SSSIs, SACs, SINCs, and other sites with protected and priority species), by supporting proposals that improve access, connectivity and the creation of new habitats throughout the borough. Measures include</u> <del>by</del> <u>maintaining trees, native vegetation, and improving and restoration of open spaces and green infrastructure</u> <del>providing new areas of such vegetation for the benefit of wildlife;</del> <u>and</u></i></p> <p><i>(d) Working with partners and local conservation groups to improve conditions for biodiversity in the borough; <u>and</u></i></p>	In response to R01090/37, and for consistency

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			<i><u>(e) <del>2</del>-Seeking, where possible, new development to include measures to improve biodiversity and greening of the borough such as by green and brown roofs, rainwater harvesting, green walls, bird and bat nesting and rooting opportunities.</u></i>	
MM68	134	Para 6.6.2	<p>Insert three new paragraphs after para. 6.6.2 to read:</p> <p><u><i>“As part of any screening assessment and, where required, appropriate assessment carried out under the Conservation of Habitats and Species Regulations 2010, the Council will consider any mitigation and/or compensation measures proposed to address potential impact on the SAC. Where required, such measures would be expected generally to comprise the provision of or contribution towards provision of Suitable Alternative Natural Greenspace (SANG) and/or a contribution towards Strategic Management and Monitoring (SAMM) measures. The extent to which mitigation and/or compensation is required and, if so, in what form, should be addressed as part of any Habitats Regulations screening and, where required, appropriate assessment.</i></u></p> <p><u><i>If SANG is required, the Council will consider, as part of an Habitats Regulation screening or appropriate assessment, improvement to existing open space within and beyond the borough including improvement of open space at Roding Valley. If SAMM is required, applicants should in the first instance consider contributions to, or facilitating the implementation of, management measures proposed by the Conservators of Epping Forest, and are advised, as part of the preparation of a Habitats Regulation screening or appropriate assessment, to liaise at an early stage with the Conservators of Epping Forest to establish what opportunities for mitigation are available.</i></u></p>	In response to discussions arising from Day 2 and Day 9 of the hearing sessions and SANG and SAMM note (CED033)

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			<p><u>Further guidance and advice on the levels of contributions sought for SANG and SAMM measures and the mechanisms for delivery will be set out in the Council's Planning Obligations SPD.</u></p>	
MM69	134	Para 6.6.2	<p>Insert new text to the end of paragraph 6.6.2 as follows:</p> <p><u>"Development which is proposed to take place beyond 2km of the SAC boundary may also require screening and, where necessary, appropriate assessment pursuant to the Habitat Regulations, particularly where that development is likely to generate large number of traffic movement on roads within and in close proximity to the SAC. Those promoting such developments should also seek early engagement with the Council."</u></p>	<p>In response to Inspector's Issue 10, q. iii) (document CED031)</p>
MM70	135	Policy LP40	<p>Modify Policy LP40 as follows:</p> <p><u>"1. The Council will protect existing and support additional land to be used for burial space where:</u></p> <p><i>(a) There is an identified need for the space;</i>  <del><i>(b) It would not result in an over concentration of facilities in a given location;</i></del>  <del><i>(c) It would not harm the amenity of nearby residents;</i></del>  <del><i>(d) The quality of water resources and the landscape is maintained;</i></del>  <del><i>(e) It would not impede the safe and efficient functioning of the public highway;</i></del>  <del><i>(f) Associated built facilities are of compatible design and scale with their surroundings."</i></del></p>	<p>In response to Inspector's Issue 10, q. iv) (document CED031)</p>

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MM71	138	Policy LP41	<p>Modify Policy LP41 criteria (b) as follows:</p> <p><i><u>“Working with relevant providers to ensure that necessary infrastructure is secured <u>at the appropriate time in accordance with the masterplans</u> to support Redbridge’s growth and provide the facilities needed for the borough’s communities. Information on key infrastructure programmes and projects, <u>essential to the first 5 years of the plan in particular, required in the borough up to 2030</u> are set out in Appendix 2;”</u></i></p> <p>And number opening paragraph of policy.</p>	<p>In response to Inspector’s Issue 12, q. ii) (document CED032), and consistency</p>
MM72	141	Para 7.3.4	<p>Insert a new sentence at the end of paragraph 7.3.4 to read:</p> <p><i><u>“To ensure comprehensive and coordinated development is achieved, masterplans will be required on the key strategic sites (already identified in policies LP1A-LP1E). This detailed masterplanning process will ensure those items of infrastructure which are essential to be delivered before certain developments or a certain amount of new homes are delivered and managed in a timely way to support growth.”</u></i></p>	<p>In response to Inspector’s Issue 12, q. ii) (document CED032)</p>
MM73	141	Para 7.3.6	<p>Insert a new paragraph after 7.3.6 to read:</p> <p><i><u>“The Council will encourage dialogue between developers and service providers at an early stage to ensure that new infrastructure provision properly acknowledges opportunities and constraints of the specific development site and its surroundings. Where necessary, development will be phased to ensure it comes forward at the same time, or following the provision of infrastructure.”</u></i></p>	<p>In response to Inspector’s Issue 12, q. ii) (document CED032)</p>

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MM74	146	Appendix 1	See separate schedule (document LBR 2.06.1) for modifications to Appendix 1.	In response to Inspector's Post Hearing Advice Part 1 (IED011) and Part 2 (IED012)
MM75	167	Appendix 3	See separate schedule (document CED036) for modifications to Appendix 3.	In response to Inspector's Issue 12, q. iii) (document CED032)
MM76	171	Appendix 5	To be amended as set out in document CED037, and retitled as Appendix 6 in light of AM65.	In response to Inspector's Issue 7, q. iv) (document CED028)
MM77	182	Appendix 9	Amend first sentence of final paragraph of town centres definition in Appendix 9 to read:  <i><del>"Local/Neighbourhood</del> Centre – Woodford Broadway/ Snakes Lane, Woodford Bridge, <u>Woodford Green</u>, Manford Way, Seven Kings, Goodmayes, Ilford Lane and <u>Green Lane Newbury Park</u> – typically serve a localised catchment often most accessible by walking and cycling and include local parades and small clusters of shops, mostly for convenience goods and other services."</i>	In response to Inspector's Issue 7, q. iv) (document CED028)