

## Proposed Additional Modifications (AM) to Redbridge Local Plan – October 2017

*(Please note these modifications are not subject to public consultation)*

Modification Number	Page	Para/ Policy/ Section	Detail of Modification	Source/ Reason of Modification
AM1	9	Para 1.15.5	<p>Rephrase last sentence of 1.15.5 to read:</p> <p><i><del>"The number of older people (persons aged 65 years and over) is 36,218 equating to 12% of the overall population, which is also greater than the London average of 12%.</del> <u>The borough also has a high number of older people"</u></i></p> <p>and delete 3rd sentence of 3.10.2: <i><del>"Currently 12% of the population are of retirement age (65 years or over), which is the 13th highest in London."</del></i></p>	In response to R00411/06
AM2	14	Para 1.22.2	<p>Amend last sentence of paragraph 1.22.2 to read:</p> <p><i><u>"Epping Forest is designated as a Natura 2000 site, whilst Hainault Forest Country Park is of regional importance in supporting breeding populations of a range of priority species."</u></i></p>	In response to R01090/01
AM3	17	Key Diagram – Figure 6.	<p>Amend Key Diagram to remove boundary of Investment &amp; Growth Area going into Chadwell Heath &amp; Marks Gate.</p> <p>Include 'London Riverside' on Key Diagram.</p> <p>Delete 'Proposed Education' symbol from Ford Sports Ground and Oakfield sites.</p>	In response to R01258/01 and in response to Inspector's Post Hearing Advice Part 2 (IED012).

Modification Number	Page	Para/ Policy/ Section	Detail of Modification	Source/ Reason of Modification
AM4	18	Table 2 - Strategic Objectives	<p>Modify Strategic Objective 1, bullet point 3, to read:</p> <p><i><u>“Protection of the existing family housing stock whilst ensuring <del>Ensure</del> diversity of <del>in</del> type, size and tenure of new housing, including affordable housing to meet local needs, <u>tackle homelessness and</u> to deliver the annual minimum housing target of 1,123 new homes;”</u></i></p> <p>Amend point 4, Objective 1 as follows:</p> <p><i><u>“Respect and enhance the character of the borough’s <del>established residential neighbourhoods</del> <u>built heritage and residential neighbourhoods</u>”</u></i></p> <p>Amend point 4, Objective 4 as follows:</p> <p><i><u>“To <del>preserve</del> conserve and enhance the unique <del>character</del> <u>historic environment</u> of Redbridge, and the <u>character and</u> distinctiveness of the borough’s conservation areas and other historic and valued buildings, spaces and places”</u></i></p>	In response to R01100/02 and R01218/04
AM5	20	Policy LP1	<p>Amend bullet point 2 in the Implementation section of Policy LP1 as follows:</p> <p><i><u>“2 The Council will prepare and facilitate the production <u>and updating</u> of planning briefs and/or Masterplans for the key Opportunity Sites as required. In particular, master-planning frameworks will be prepared to guide the future development at <del>Oakfield, Goodmayes and King George Hospitals, Ford Sports Ground, and</del> <u>land at Billet Road, Station Estate and Gants Hill Opportunity Sites;</u>”</u></i></p>	In response to R00416/11 and in response to Inspector’s Post Hearing Advice Part 2 (IED012).
AM6	23	Figure 7	Amend Figure 7 to differentiate between the borough boundary and the Ilford	In response to R01256/03

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			Investment and Growth Area.	
AM7	27	Figure 8	Delete Development Opportunity Site polygon and 'Proposed Education' symbol from Ford Sports Ground site.	In response to Inspector's Post Hearing Advice Part 2 (IED012).
AM8	26	Para 3.4.5	Add the following text to the end of para. 3.4.5. as follows:  <i>"Chadwell Heath Station, the Eva Hart Public House and the Art Deco Bingo Hall on the corner of Wangey Road are important local landmarks, <u>and to the north of Chadwell Heath Centre, Little Heath Conservation Area is an important local heritage asset.</u>"</i>	In response to R01218/08
AM9	35	Figure 11	Delete Development Opportunity Site polygon and 'Proposed Education' symbol from the Oakfield site.	In response to Inspector's Post Hearing Advice Part 2 (IED012).
AM10	36	Para 3.7.7	Update to read:  <i><del>"Barkingside town centre has the capacity to provide approximately 5,000 sq.m office and commercial floorspace (Policy LP9). This will further diversify the range of uses and jobs in the area. Proposals at Tanners lane, just south of the town centre, include new housing and The now implemented enhanced office facilities at Tanners Lane has ensured Barkingside remains the home of the world renowned children's charity Barnardo's remains the headquarters of this world renowned charity. Beyond</del></i>	Council - for consistency with proposed modifications to Policy LP1E

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			<u><i>this, there is limited scope in the Investment and Growth Area for new employment floorspace.</i></u>	
AM11	38	Para 3.8.10	Update paragraph 3.8.10  <i>“Paragraph 47 of the NPPF aims to ‘boost significantly the supply of housing’, and in order to demonstrate the Council’s ambition and commitment to achieving this, it will update <del>has developed</del> the Housing Sites Implementation Strategy. This document sets out a strategy and the mechanisms through which the Council will seek to ensure a high level of housing delivery in the borough particularly over the first five years of the Plan.”</i>	Council – factual update
AM12	43	Para 3.9.10	Include new sentence after 3.9.10 to state:  <u><i>“The Council will also continue to implement its Purchase and Repair Scheme to deliver new affordable housing in the borough.”</i></u>	In response to R01100/02
AM13	44	Para 3.10	Modify sub-heading to para 3.10 to state:  <u><i>“Specialist accommodation <u>for</u> older, vulnerable, <del>and</del> homeless residents <u>and</u> students”</i></u>  Modify second sentence in point 1 of LP4 as follows:  <u><i>“The Council will support various forms of Specialist <del>Housing</del> <u>Accommodation</u> where it:”</i></u>	In response to Inspector’s Issue 7, q. ii) (page 18 of document CED028)

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AM14	45	Para 3.10.3	<p>Amend 3<sup>rd</sup> sentence to read</p> <p><i><u>“This includes building new wheelchair accessible homes in accordance with building regulation requirements” to lifetime homes and being wheelchair accessible (see policy 32).”</u></i></p>	Council – update in relation to national policy/ regulations
AM15	53	Para 3.16.3	<p>Amend para 3.16.3 to read as follows:</p> <p><i><u>“In planning for future growth the Council has undertaken a Retail Capacity Study (2015) which examined the quantitative need for new convenience and comparison floorspace in the borough over the plan period. The study found that there is scope for between 23,911 – 39,851 sq.m (net) of comparison retail floorspace and between 8,562-17,071 sq.m (net) of convenience floorspace. The Retail Sites Opportunities Assessment (2015) considered the availability and suitability of sites in the borough to deliver the new floorspace, and cites a gross to net floorspace ratio of 70% on the basis of the urban context of potential sites. It found that there is sufficient capacity within designated Opportunity Sites in existing town centres to meet the minimum floorspace capacity requirements over the Plan period, and the Council has supplemented this by identifying additional sites in town centres for new retail space, as set out in Appendix 1.”</u></i></p>	To reflect discussion during Day 8 of the hearing.
AM16	53	Para 3.16.4	<p>Amend para 3.16.4 to read as follows:</p> <p><i>“At the heart of the Council’s strategy for delivering growth is a hierarchy of town centres. As set out in Appendix 5, there is already a well-established network of centres in the borough. Ilford is designated as a Metropolitan Centre, with Barkingside, Gants Hill, South Woodford, Wanstead, <u>Green Lane</u>, and Chadwell</i></p>	For consistency with modifications to LP10.

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			<p><i>Heath designated as District Centres. In addition, Woodford Broadway/ Snakes Lane, Woodford Bridge, Manford Way, Seven Kings, Goodmayes, Ilford Lane and <u>Green Lane Newbury Park</u> are designated as Local Centres. The Council intends to reinforce the existing hierarchy of centres by steering new development proposals appropriate to their role into these designated centres. By doing this, the Council will seek to create distinctive centres, with each centre building on its unique characteristics to provide a unique 'offer'."</i></p>	
AM17	56	Policy LP10	<p>Renumber implementation part of LP10 from 3-7 to 1 -5. Amend existing part 6 bullet point 2 as follows:</p> <p><del>"Optimise heritage and natural assets</del> <u>Respond to, and work positively with historic and natural assets"</u></p>	In response to R01218/12
AM18	59	Para 3.18.4	<p>Insert the following text after 3.18.4:</p> <p><u>"The number of shisha bars in the borough has increased significantly in the last few years. Many of these operate unlawfully. Given the nature of the use, Shisha bars can adversely impact the amenity of an area, particularly through late night noise and disturbance. In response, the Council has developed a Council wide approach with the Council's Planning Enforcement, Environmental Health, Licencing Enforcement sections and the Fire Brigade, all working alongside each other to manage the growth in this use. This corporate approach seeks to ensure that such uses gain the correct permissions and also ensure that they meet all other legislation requirements. In addition, there is also a focus on educating and ensuring the individuals who run the establishments fully understand the implications and obligations they have to their staff and customers."</u></p>	In response to Inspector's Issue 7, q. v) (document CED028)

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AM19	59	Policy LP12	Number opening paragraph as follows:  <i>"<u>1.</u> The Council will support and foster a diverse and safe night-time economy in the borough by:"</i>	Council - consistency
AM20	61	Para 3.21.2	Amend 2 <sup>nd</sup> sentence to read:  <i>"The borough has approximately 59.<u>37</u>ha of employment land of which 42.<u>84</u> is designated and <del>17.38</del> <u>16.54</u> is non-designated (over 0.25ha)"</i>	Council – factual update
AM21	61	Para 3.21.3	Amend to read:  <i>"Industrial land uses continue to make a valuable contribution to local employment and provide important local services. The Council recognises the role these play in providing a suitable range of jobs and acting as locations in the borough for jobs, <u>and therefore seeks to protect its best quality industrial land alongside planned growth of new business space.</u> <del>A number of leading UK companies have made Redbridge their head office location in recent years.</del>"</i>	Council - to clarify policy approach
AM22	65	Figure 14	Update to show location of Local Business Areas, and what part of SIL designations are IBP and what parts PIL; consistent with Policies Map	Council – clarity

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AM23	67	Policy LP16	<p>Number opening paragraph as follows:</p> <p><i><u>1.</u> The Council will seek to address unemployment by facilitating training opportunities for local residents, and increasing the employment offered in the borough by:</i></p> <p>And implementation as follows:</p> <p><b><i>“Implementation</i></b></p> <p><i><u>1.</u> The Council will make use of planning obligations and the Community Infrastructure Levy (CIL).”</i></p>	Council - consistency
AM24	70	Para 3.24.8	<p>Amend 3<sup>rd</sup> sentence in paragraph 3.24.8 as follows:</p> <p><i>“There are 71 schools in Redbridge and it is estimated that a <u>further 10</u> <del>16</del> additional primary schools form of entry and <u>47</u> <del>54</del> secondary schools form of entry will be required over the life of the Local Plan.”</i></p>	Factual update to reflect the current IDP and in response to Inspector’s Issue 7, q. xiii) (document CED028)
AM25	72	Policy LP18	<p>Amend point 5 of LP18 as follows:</p> <p><i>“The Council will support the provision of new or improved health facilities <u>to support future growth</u>, in line with Redbridge’ Clinical Commissioning Group and NHS England requirements, <u>as set out in Appendix 2</u>, and protect existing health facilities in line with LP17 Community Infrastructure.”</i></p>	Council clarification.
AM26	75	Para 3.30.4	<p>Amend to read as follows:</p> <p><i>“The location and accessibility of health facilities has a direct impact on the health of</i></p>	Council – removing duplication of text from paragraph 3.29.2

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			<p><i>the population (and the need for health facilities to meet demand from occupiers of new development is also addressed in LP17). But these wider implications of planning and development on health outcomes must be considered.} Health should not be seen as an isolated topic when assessing planning applications, rather it should be integrated with these wider planning matters outlined above. <del>The Council will ensure that health implications arising from developments will be discussed at the earliest opportunity in the development planning stage. The local plan policies have been developed to ensure the determinants of health are captured, ensuring the physical and mental health and wellbeing of those living, working and visiting the borough is addressed.</del></i></p>	
AM27	79	Para 4.3.8	<p>Rephrase paragraph 4.3.8 to read:</p> <p><i>“Trees are a prominent feature in the borough and significantly contribute not only to local character but also in <u>terms of climate change adaptation.</u> <del>mitigating against the effects of climate change.</del> In accordance with LP38 new development should seek to incorporate new trees and other vegetation as part of their development to further contribute to the ‘greening’ and <u>help adapt to</u> <del>of the borough and mitigate against the impacts of climate change.</del>”</i></p>	In response to R01090/16
AM28	81	Para 4.4.2	<p>Insert to end of paragraph 4.4.2:</p> <p><i><u>“Using the findings of the SFRA, a Sequential and Exception Test has been prepared to accompany the Local Plan. This demonstrates that both the strategic sites in Policy LP1, and the proposed opportunity sites listed in Appendix 1 pass these tests where necessary.”</u></i></p>	In response to R01089/01

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AM29	81	Para 4.4.3	Amend final sentence of paragraph 4.4.3 to read:  <i><u>“The probability of such events recurring is likely to increase as a result of climate change, making it important to ensure new development minimises risk of flooding; both to occupiers of new buildings, but also to communities already at risk of flooding.”</u></i>	In response to R01089/03
AM30	81	Para 4.5.1	Rephrase paragraph 4.5.1 to read:  <i><u>“The largest river to flow through the borough is the River Roding. <del>and the o</del>Other main rivers includes <del>its tributaries and</del> the largely culverted Cran Brook and Seven Kings Water/ <u>Loxford Water</u>. The River Roding (Lower) is affected by the tide from Ilford.”</u></i>	In response to R01089/11
AM31	82	Policy LP21	Amend 2nd sentence of existing point (f)/ amended point (g) to read:  <i><u>“All new developments on sites with existing culverts should seek opportunities to de-culvert these streams to reduce flood risk and provide <u>nature</u> conservation benefits; <del>and.</del>”</u></i>  Amend first sentence of implementation to read:  <i><u>“The Council will continue to work with the Environment Agency and other relevant bodies to <u>meet the requirements of the Thames River Basin Management Plan and Water Framework Directive, in order to address current and future flooding and water quality issues and minimise risks.</u>”</u></i>	In response to R01090/17 and R01089/09.

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AM32	82	Para 4.5.2	Rephrase first sentence of paragraph 4.5.2 to read:  <i>“Both the NPPF and the London Plan (2015) require the planning process to actively manage development to minimise the likelihood of <u>flooding</u> <del>such events being repeated.</del>”</i>	In response to R01089/12
AM33	84	Para 4.6.2	Rephrase first sentence of paragraph 4.6.2 to read  <i>“To help combat this, <u>the incorporation of Sustainable Drainage Systems (SuDS) are now being employed. into new developments is an effective way of mitigating flood risk, and as such is encouraged in policy LP21.</u>”</i>  Amend final sentence of paragraph 4.6.2 to read:  <i>“An added benefit of SuDs is that they can improve the water quality of rivers, lakes and streams <u>(in accordance with the objectives of the Water Framework Directive)</u> by removing many pollutants and much of the particulate matters from storm water before it leaves the development site. <u>They can also be multifunctional and provide biodiversity benefits</u>”</i>	In response to R01089/14 and R01090/18
AM34	87	Para 4.9.2	Amend 2 <sup>nd</sup> sentence to read:  <i>“This will be transformative and will bring approximately £70 million of direct public sector investment into <u>our town centres</u> <del>the town centre</del> providing an important catalyst for growth and regeneration”.</i>	In response to R01213/16

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AM35	87	Para 4.9.3	Amend first two sentences in para 4.9.3 to read as follows:  <i>“The two traffic gyratories in Ilford are a cause of great severance within the town centre. <del>with relatively isolated areas within the system of traffic lanes.</del> To improve this situation the Council will seek to <del>alter the land use of these areas to improve pedestrian links and local access issues whilst being mindful of the accommodation of the tidal commuter flow through the borough.</del>”</i>	In response to R01213/17
AM36	88	Para 4.10.1	Amend second and third sentences of para 4.10.1 as follows:  <i>“This is reflected in <del>the lower levels of public transport accessibility and</del> higher rates of private motor vehicle ownership in outer London. This, coupled with increased traffic from outside the borough, has put severe pressure on the local <u>highway network</u>, resulting in increased traffic congestion.”</i>	In response to R01213/18
AM37	88	Para 4.10.2	Amend second sentence of para 4.10.2 as follows:  <i>“a substantial modal shift away from the private car to more sustainable <u>transport options</u> <del>means</del> is therefore essential to addressing these issues by reducing traffic congestion and improving air quality in the borough.”</i>	In response to R01213/19
AM38	88	Para 4.10.3	Amend para 4.10.3 as follows:  <i>“The Council will continue to work with TfL <del>and London Buses</del> to develop and improve the bus service network in the borough. The Council will lobby TfL <del>buses</del> to increase provision and frequency of services to improve connectivity particularly to the borough’s Growth and Investment Areas where significant number of new homes and jobs will be located. Improvement in the level of provision and frequency</i>	In response to R01213/20

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			<i>to feeder routes to Crossrail stations are considered to be of particular benefit to encouraging residents not to drive to stations. In addition, the Council is keen to work with TfL <del>and London Buses</del> to provide additional penetration to the more remote parts of the borough and in particular to parts of Fairlop and Hainault."</i>	
AM39	89	Para 4.10.7	Amend last sentence of para 4.10.7 to read as follows:  <i>"The Council will seek to overcome barriers to cycling <u>and</u> <del>to</del> increase the level of cycling in the borough by securing safe and attractive cycling infrastructure, particularly to provide the facilities required at the start and end of local journeys to make these modes more attractive to use. <del>especially encouraging this to be provided in new developments."</del></i>	In response to R01213/21
AM40	90	Para 4.11.2	Amend last sentence in para 4.11.2 to read:  <i>"Measures which can be included in new development include <u>end of journey facilities such as lockers and showers, high quality cycle parking facilities</u> (see LP23), reduced travel cost schemes and car parking management."</i>	In response to R01213/22
AM41	90	Para 4.11.3	Amend last two sentences in para 4.11.3 to read:  <i>"DSPs are key strategy documents outlining how an organisation will <u>manage its</u> freight transport efficiently, safely and in a sustainable way. CLPs have similar objectives to DSPs, but are applied to the <del>design</del> <u>demolition</u> and construction phases of <del>premises</del> <u>development</u>, specifically to improve construction freight efficiency, <del>to reduce by reducing</del> CO2 emissions <del>and</del> congestion and improving the safety of vulnerable <del>residents</del> <u>road users</u>".</i>	In response to R01213/23

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AM42	90	Para 4.13.2	<p>Amend last sentence of para 4.13.2 as follows:</p> <p><i><u>“The excellent PTAL in Investment and Growth Areas coupled with the range of sustainable transport options means that lower levels of parking, <u>in line with the London Plan</u>, can be provided in new development.”</u></i></p>	In response to R01213/25
AM43	95	Para 14.17.5	<p>Insert new paragraph 14.17.5 to read:</p> <p><i><u>“Water pollution can come from multiple sources, harms the natural environment, and requires a multi-agency approach to tackle. It goes beyond the design of new developments, and matters such as plumbing misconnection of new appliances can have a major impact. The Council will work with the Environment Agency to ensure their technical advice is considered where new development proposals pose a risk to water quality, and the objectives of the Water Framework Directive and Thames River Basin Management Plan are met.”</u></i></p>	In response to R01089/16
AM44	95	Para 4.17.1	<p>Amend 3rd sentence of 4.17.1 to read:</p> <p><i><u>“Other adverse impacts include use of unnecessary amounts of energy and in some detrimental effects on road safety or on wildlife <u>such as through disturbance to the ecosystems of nocturnal species</u>”</u></i></p>	In response to R01090/21 and R00325/17.

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			<p>Insert at the end of paragraph 4.17.1:</p> <p><u><i>“Proposals for floodlighting should consider Sport England’s lighting guidance.”</i></u></p>	
AM45	101	Para 5.1.13	<p>Insert the following text to the end of paragraph 5.1.13:</p> <p><u><i>“...well integrated with the surrounding area, and should <del>preserve or conserve</del> and enhance the special character of areas of historic or architectural value, and the setting of heritage assets.”</i></u></p>	In response to R01218/15
AM46	101	Para 5.2.1	<p>Add the following text to the end of paragraph 5.2.1:</p> <p><u><i>“There are a number of building typologies, as outlined in the Redbridge Characterisation Study (2014), that could be used to achieve higher density development, without the need for tall buildings. Other approaches include the new London vernacular design palette, which involves the development of stacked maisonettes, flats and town houses, intensifying capacity without building tower blocks.”</i></u></p>	In response to R01218/16
AM47	105	Para 5.2.12	<p>Add the following text to the last sentence of para. 5.2.12 to read as follows:</p> <p><u><i>“This work will inform future planning brief work for specific sites, and will be guided by Historic England’s Advice Note 4 on Tall Buildings.”</i></u></p>	In response to R01218/18

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AM48	107	Para 5.4.3	<p>Amend paragraph 5.4.3 to read</p> <p><del>“In order to promote these outcomes, †The Council has adopted numerical standards for amenity space which it believes are the reasonable minimum which new housing should attain, but it recognises that circumstances may sometimes warrant a flexible approach. For instance, it may not be necessary to provide the full complement of private amenity space if a local park is close by and people occupying town centre apartments often accept a lifestyle in which a communal roof terrace of all-weather gymnasium substitutes for a private garden.”</del></p>	In response to R01217/10
AM49	107	Para 5.4.4	<p>Amend paragraph 5.4.4 to read as follows:</p> <p><i>“There are many innovative ways of providing amenity space including well integrated terraces, balconies and loggia, <u>community gardens</u> winter gardens and green roofs. These can provide quality, functional space, <u>space for community interaction</u>, <u>local food growing</u> and even wildlife habitats on constrained sites, as well as reducing urban run-off and providing insulation.”</i></p>	In response to R01205/07
AM50	107	Policy LP29	<p>Amend Policy LP29, part 2(b), as follows:</p> <p><i>“2 (b) Be of an appropriate scale to maximise usability and to be of a functional and practical configuration to enable a range of reasonable activities including sitting out, dining, child’s play, <u>gardening</u> and social interaction...”</i></p>	In response to R01205/06a

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AM51	115	Para 5.7.4	<p>Insert new criteria i) to paragraph 5.7.4 to read as follows:</p> <p><i>“ i) Entries on the national Heritage at Risk register 2015:</i></p> <ul style="list-style-type: none"> <li><i>• <u>831 High Road, Ilford; Goodmayes (listed Grade II);</u></i></li> <li><i>• <u>The Dr Johnson Public House, Longwood Gardens, Ilford;</u></i></li> <li><i>• <u>Garden Temple, in Garden of Temple House, 14 The Avenue, Wanstead E11(listed Grade II);</u></i></li> <li><i>• <u>Wanstead Park, Wanstead, Redbridge E11 (registered Park and Garden Grade II);</u></i></li> <li><i>• <u>Mayfield/Bungalow Estate, Conservation Area, Mayfield Seven Kings, Redbridge;</u></i></li> <li><i>• <u>Wanstead Park Conservation Area, Wanstead, Redbridge E11;</u></i></li> <li><i>• <u>Woodford Bridge Conservation Area, Woodford, Redbridge.”</u></i></li> </ul>	In response to R01218/19
AM52	115	Para 5.7.5	<p>Amend first sentence of paragraph 5.7.5 to read:</p> <p><i>“These heritage assets are irreplaceable resources that have broad social, cultural, <u>environmental</u> and economic significance, and which are important to this and future generations.”</i></p>	In response to R01090/24 and R01218/21.
AM53	116	Policy LP33	<p>Make corrections to the name ‘English Heritage’ to read ‘Historic England’ in the following text:</p> <p>LP33, existing criteria 4 (a)/ modified criteria d (i):</p> <p><i>“Advice should be taken from <del>English Heritage</del> <u>Historic England</u> and provision should be made for on-site investigations that include the recording of archaeological evidence within the affected area.”</i></p>	In response to R01218/20

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			<p>LP33, Implementation Action 1:</p> <p><i>“1. Develop criteria for the designation of Conservation Areas in the borough, directed by advice and guidance from <del>English Heritage</del> <u>Historic England</u> and the heritage sector.”</i></p> <p>LP33, Implementation Action 5:</p> <p><i>“5. Work with owners, the heritage sector, bodies providing grant funding and local communities to find viable solutions that secure the long-term future of heritage assets on <del>English Heritage’s</del> <u>Historic England’s</u> Heritage at Risk Register.”</i></p> <p>Appendix 3 Monitoring Framework, Theme 4, Delivery Agency column –</p> <p><i>“LBR Planning &amp; Regeneration Service LBR Leisure Services Sport England Natural England <del>English Heritage</del> <u>Historic England</u>”</i></p>	
AM54	120	Para 6.1.2	<p>Include reference to heritage assets at the end of paragraph 6.1.2, as follows:</p> <p><i><u>“Other important assets include the borough’s heritage assets, such as conservation areas and listed buildings. The Council’s policy approach for the historic environment and its preservation and enhancement as a key borough asset is outlined in detail in Section 5 of the Plan (see Policy LP33)”</u></i></p>	In response to R01218/13

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AM55	120	Para LP34	Amend policy LP34 title as follows:  <i>LP34: Managing and Protecting the Borough's Green Belt and Metropolitan <u>Open Land</u></i>  Rephrase point 2(b) to read:  <i>"Supporting development which improves access to Green Belt areas for beneficial uses such as outdoor sport and recreation where there is no conflict with protecting the openness <u>and nature conservation value</u> of such land."</i>	Correction as discussed during Day 9 of the hearing sessions, and in response to R01090/25
AM56	123	Figure 22	Figure 22 updated to show location of GB11c (consistent with boundaries shown on the Policies Map).  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 Parcels'.	In response to R01115/03 and in response to the Inspector's Post Hearing Advice Part 2 (IED012).
AM57	124	Paras 6.2.2	Rephrase penultimate sentence of paragraph 6.2.2 to read:  <i>"The borough's open spaces <del>include provide</del> habitats and <u>areas of biodiversity value (see LP39), and helping</u> to control and manage flood risk and mitigate the risk of climate change."</i>	In response to R01090/29
AM58	125	Figure 23	Figure 23 updated to show to be consistent with figure 22 (AM57).	
AM59	128	Para 6.3.1	Amend last sentence of paragraph 6.3.1 to read:	In response to R01090/32

Modification Number	Page	Para/ Policy/ Section	Detail of Modification	Source/ Reason of Modification
			<i>“Such spaces also contribute to maintaining and enhancing biodiversity (See LP37 - <del>and LP389)</del>”</i>	
AM60	130	Para 6.4.6	<p>Replace final 2 sentences of paragraph 6.4.6 with new paragraph 6.4.7 to read:</p> <p><i><u>“The River Roding is currently classified as having poor ecological potential and Seven Kings Water is classified as ‘moderate.’ Both watercourses need to achieve good ecological potential by 2027 under the Water Framework Directive. The watercourses are heavily modified by concrete channels and banks (culverting in places) and domestic plumbing misconnections, urban runoff and non-native species all contribute to poor water quality and ecology. It is important developments in the borough do not cause further deterioration and they make a positive contribution to improve and restore the watercourses. In addition, The Council will promote the improvement of water quality in the Blue Ribbon Network in accordance with the Thames River Basin Management Plan, by working in partnership with the Environment Agency and other partners such as the Roding, Beam and Ingrebourne Catchment Partnership. The London Rivers Action Plan (LRAP) aims to promote river restoration across London through the enhancement of riverside parks and green spaces.”</u></i></p>	In response to R01089/26
AM61	130	Para 6.4.1	<p>Amend paragraph 6.4.1 to read:</p> <p><i><u>“The green infrastructure network is a multi-functional resource that includes a range of types <del>number</del> of open spaces including the green belt and Sites of Importance for Nature Conservation, parks, paths, walkways, SuDS features, and other environmental features such as the Blue Ribbon Network. It <del>The green infrastructure network</del> links places both within and beyond the borough and encourages walking, cycling and access to nature whilst also providing biodiversity</u></i></p>	In response to R01090/34

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			<i>benefits. Green infrastructure therefore plays a vital role in improving people's quality of life."</i>	
AM62	130	Policy LP37	<p>Number opening paragraph as follows:</p> <p><i>"<u>1. The Council will promote a good quality network of accessible open spaces across the borough to enhance the environment, biodiversity and provide opportunities for outdoor recreation by:</u>"</i></p>	Consistency
AM63	131	Policy LP38	<p>Amend last sentence of paragraph 6.5.1 to read:</p> <p><i>"The Council recognises <u>the role</u> that trees play as part <del>role in</del> <u>of</u> the borough's green infrastructure (see LP36), providing scenic amenity, local environmental quality, provide local character, promoting biodiversity (see LP3<u>89</u>) and mitigating climate change and air pollution (see LP18)."</i></p> <p>Under implementation section of Policy LP38 insert additional point 4 to read:</p> <p><i><u>"4. Further guidance on protecting trees and enhancing the landscape is provided in the Trees and Landscaping SPD."</u></i></p> <p>And additional implementation point 2 under Policy LP39 to read:</p> <p><i><u>"2. Further guidance on protecting and enhancing the natural environment is provided in the Nature Conservation SPD."</u></i></p>	In response to R01090/36 and R01090/02

Modification Number	Page	Para/ Policy/ Section	Detail of Modification	Source/ Reason of Modification
AM64	134	Policy LP39	<p>Under Policy LP39 amend point 1d to read:</p> <p><i>“Working with partners and local conservation groups to improve conditions for biodiversity in the borough <u>in accordance with the Biodiversity Action Plan/Nature Conservation Strategy</u>”</i></p>	<p>In response to R01090/38, then updated to reflect Statement of Common Ground between the Council and the London Wildlife Trust (CED040)</p>
AM65	134	Para 6.6.3	<p>Amend first two sentences of paragraph 6.6.3 to read:</p> <p><i>“Other important sites include Sites of Special Scientific Interest covering parts of Epping Forest, Wanstead Flats and Hainault Forest. Sites of Importance for <del>Metropolitan</del> Nature Conservation <del>importance</del> <u>include several sub categories that reflects their value and how they were identified. In total there are currently 35 SINC</u>s in the borough, which are shown on the Policies Map and listed in Appendix 5. <del>include the River Roding and Seven Kings Water.</del>”</i></p> <p>Insert new Appendix 5 to read as follows, and renumber subsequent appendices accordingly:</p> <p><b><i>“Appendix 5 – Sites of Importance for Nature Conservation</i></b></p> <p><u><i>Sites of Metropolitan Importance</i></u></p> <ul style="list-style-type: none"> <li>• <i>Epping Forest</i></li> <li>• <i>Hainault Forest</i></li> <li>• <i>Epping Forest South</i></li> <li>• <i>River Roding north of the Liverpool Street to Southend Railway</i></li> <li>• <i>Claybury Wood</i></li> </ul>	<p>In response to R01090/39, then updated to reflect Statement of Common Ground between the Council and the London Wildlife Trust (CED040)</p>

Modification Number	Page	Para/ Policy/ Section	Detail of Modification	Source/ Reason of Modification
			<p><u>Sites of Borough Importance (Grade 1)</u></p> <ul style="list-style-type: none"> <li>• Claybury Park Grassland</li> <li>• Fairlop Plain and Fairlop Water</li> <li>• Hainault Forest Country Park and Golf Course</li> <li>• Roding Valley Park</li> <li>• Hainault Lodge Local Nature Reserve</li> <li>• Hargreaves Scout Camp, Seven Kings Water and Goodmayes Hospital</li> <li>• River Roding South of Liverpool Street to Southend Railway</li> </ul> <p><u>Sites of Borough Importance (Grade 2)</u></p> <ul style="list-style-type: none"> <li>• South Park</li> <li>• Valentines Park</li> <li>• Woodford Bridge Green Pond</li> <li>• Central Line Railsides</li> <li>• Goodmayes Park</li> <li>• Ilford to Chadwell Heath rail sides</li> <li>• Alders Brook at Ilford Golf Course</li> <li>• Woodford Green and Ponds</li> <li>• The Exchange Lands</li> <li>• Wanstead War Memorial (Tarzy Wood)</li> <li>• Whiskers Island</li> <li>• Trinity High School Pond</li> <li>• Loxford Water</li> </ul> <p><u>Sites of Local Importance</u></p> <ul style="list-style-type: none"> <li>• Ilford Cemetery and St. Mary's Churchyard</li> </ul>	

Modification Number	Page	Para/ Policy/ Section	Detail of Modification	Source/ Reason of Modification
			<ul style="list-style-type: none"> <li>• Clayhall Park</li> <li>• Cocked Hat Plantation (Hurstleigh Gardens Open Space)</li> <li>• Loxford Park</li> <li>• The Glade, Woodford Bridge</li> <li>• Newbury Park War Memorial Garden</li> <li>• West Wood Recreation Ground</li> <li>• Well Brook at Navestock Crescent Recreation Ground</li> <li>• Gardens of Peace</li> <li>• Redbridge Recreation Ground”</li> </ul>	
AM66	135	Para 6.6.4	<p>Amend paragraph 6.6.4 to read:</p> <p><i>“The Council will resist any inappropriate and harmful development on SINC<del>s</del> and Local Nature Reserves (LNRs) unless there are exceptional circumstances and where the importance of any development coming forward outweighs the nature conservation value of the site. In such circumstances, appropriate mitigation measures must be taken and where practicable and reasonable, additional nature conservation space must be provided. <u>There is currently only one LNR in the borough (Hainault Lodge), which is also designated as a SINC. In the interests of best practice, the Council will seek to keep the borough’s SINC<del>s</del> valid and up to date and undertake a review every 5-10 years.</u>”</i></p>	In response to R01090/40, then updated to reflect Statement of Common Ground between the Council and the London Wildlife Trust (CED040) and discussions during Day 9 of the hearing sessions.
AM67	135	Para 6.7.1	<p>Amend last sentence of paragraph 6.7.1 to read:</p> <p><i>“They also contribute <u>to</u> and promote biodiversity (LP3<del>69</del>).”</i></p>	In response to R01090/43

Modification Number	Page	Para/ Policy/ Section	Detail of Modification	Source/ Reason of Modification
AM68	165	Appendix 2	Amend Appendix 2 as set out in document LBR 1.01.3	In response to Inspector's Issue 10, q. i) (document CED031) and in response to Inspector's Post Hearing Advice Part 2 (IED012).
AM69	173	Appendix 6	Amend list of business areas as follows:  <i><u>Local Business Areas:</u></i> <i>Forest Road</i> <i>Hainault Works</i> <i>Newton Industrial Estate</i> <i>Raven Road</i> <i><u>Connaught Road West</u></i> <i><u>The Shrubberies</u></i> <i><u>Barnardo's</u></i> <i><u>Coventry Road and Cranbrook Road</u></i> <i><u>Beal Road</u></i> <i><u>Wellesley Road</u></i> <i><u>Roden Street North</u></i>	Council – for consistency with proposed modifications to LP14
AM70	178	Appendix 9	Additional terms to the glossary to read as follows:  <i><u>Sites of Importance for Nature Conservation – Sites of Importance for Nature Conservation (SINCs) are areas designated for their importance for wildlife to help inform planning decisions and management. In London SINCs are designated as one of a hierarchy of types: Sites of Metropolitan Importance, Sites of Borough</u></i>	In response to R01090/48

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			<p><u>Importance (grade 1 and 2), and Sites of Local Importance.”</u></p> <p><u>Green Infrastructure – A network of green spaces – and features such as street trees and green roofs – that is planned, designed and managed to provide a range of benefits, including: recreation and amenity, healthy living, reducing flooding, improving air quality, cooling the urban environment, encouraging walking and cycling, and enhancing biodiversity and ecological resilience.”</u></p>	
AM71	180	Appendix 9	<p>Amend first sentence of definition of Local Centres in Appendix 9 to read:</p> <p><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></p>	<p>In response to Inspector’s Issue 7, q. iv) (document CED028)</p>
AM72	191	Appendix 9	<p>Correct title of definition of Specialist Accommodation in Glossary to align with policy LP4:</p> <p><i>“<del>Specialist Housing</del> <u>Specialist Accommodation</u>”</i></p>	<p>In response to Inspector’s Issue 7, q. i) (page 17 of document CED028)</p>