

| Representor ID Number | Respondent name and organisation      | Main Modification Number | Policy or Paragraph | Summary of Representation  | Officer Response  |
|-----------------------|---------------------------------------|--------------------------|---------------------|--|---|
| R00105/R1             | Ken Bean                              | MM3                      | 3.2.4               | MM3 & MM4 (paras 3.2.4 - 3.2.5) - Agree with proposed text added.  | Support noted.  |
| R00105/R2             | Ken Bean                              | MM4                      | 3.2.5               | MM3 & MM4 (paras 3.2.4 - 3.2.5) - Agree with proposed text added.  | Support noted.  |
| R00105/R3             | Ken Bean                              | MM11                     | LP1D                | <p>MM11 (PolicyLP1D) - Welcome reduction in the number of net additional new homes over the plan period from 650 to 430;</p> <p>Supportive of the ambition in seeking to increase retail from 2,000 to 3,500 sqm but would question the realism in the context of generally retracting amounts of retail floorspace in town centres.</p> <p>Welcome the increase in employment floorspace (5,000 to 6,100 sqm) and massive increase in jobs from 100 to 600 but I am unclear where / how all these new jobs will be generated.</p> <p>Welcome reference in the supporting text to investment in health infrastructure - South Woodford Health Centre and Wanstead Hospital.</p> <p>In terms of education provision, there is still reservations about the physical ability in terms of space to expand existing schools.</p> | Support noted.  |
| R00105/R4             | Ken Bean                              | MM12                     | 3.6.4               | <p>Generally welcome revised text that seeks to justify designation an Investment &amp; Growth area designation in explaining the nature of South Woodford's future balanced growth and development and the import of ensuring preservation of the special character of South Woodford.</p> <p>Suggest adding reference to positive social improvements in addition to economic, physical and environmental improvements.</p>  | Support noted. Proposed inclusion of text is considered unnecessary for soundness.  |
| R00105/R5             | Ken Bean                              | MM13                     | 3.6.5               | Welcomes reduction in number of additional new homes over the plan period and the emphasis on delivery of high quality developments.   | Support noted.  |
| R00105/R6             | Ken Bean                              | MM14                     | 3.6.6               | Agree changes.   | Support noted.  |
| R00105/R7             | Ken Bean                              | None                     | Appendix 2          | <p>Central Line capacity remains a major concern. In addition to additional growth in South Woodford, the 11,400 net additional homes predicted in neighbouring Epping Forest District over the same period needs to be taken into account; many of these new occupants are likely to commute into London using the Central Line.</p> <p>Former Woodford Football Ground off Snakes Lane East not included in plans - should be allocated for something if it has been vacant for 25 years.</p>  | <p>The Council is aware of issues relating to Central Line capacity and is engaging with neighbouring authorities (including Epping Forest District Council) and TfL on the issue. As set out in CED010 paragraphs 3.3 and 3.4 the Council is working with TfL to mitigate congestion and increase capacity on the Central Line.</p> <p>The former Woodford Football Ground was removed as a 'Development Opportunity Site', but has been moved to appendix 2 - Infrastructure Delivery Plan to be brought forward for leisure/culture uses, and a planning application for a new sports, training, health, and education facility has recently been received (reference 5434/17).</p>  |
| R00108/R1             | Nicky Tranmer, South Woodford Society | MM12                     | 3.6.4               | Plan fails to show how South Woodford will manage planned housing targets when no alternate transport links are proposed, and existing local services are inadequate; meaning residents travel further, increasing car use.  | This issue has been considered at MM46 of CED 058 where modifications have been proposed for Local Plan Policy LP22 'Promoting Sustainable Transport'. The Redbridge Transport Assessment (2017), which supports MM46, sets out location based forecasts for net increases in traffic as a result of the borough's proposed growth. The modifications to LP22 include requiring major development to demonstrate what measures will be introduced to ensure that future users will be less reliant on private motor vehicles, and consists of proposed new text stating that mitigation measures can be considered where a significant impact on traffic has been identified, and where the net increase in traffic arising from development is expected to be significant. The Council will expect, as part of any future planning application, that further work is undertaken to consider local impacts and the cumulative effects of other development. |

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| R00108/R2             | Nicky Tranmer, South Woodford Society | None                     | None                | Proposed redevelopments of business sites mean people have lost jobs or had to move as landlords wait to cash in. Viable office space cleared for conversion to residential; mixed use commercial space will be unaffordable.   | The Council will protect key business sites and strategic industrial locations in South Woodford through Local Plan Policy LP14 and the proposed further modifications to it in MM35. Policy LP14 consists of a number of strategic objectives for stimulating business and the local economy, and the Council is keen to encourage and support business and employment to boost the local economy. The objective in South Woodford is to maintain the viability of key employment sites by, for example, protecting Southend Road Business Park as a Strategic Industrial Location (SIL) and Preferred Industrial Location (PIL); protecting The Shrubberies (George Lane) as a Local Business Area; and supporting the intensification of business and general industry use classes at Ravens Road Local Business Area. MM11 also updates Policy LP1D 'South Woodford Investment and Growth Area' to include a key growth objective of creating 6,100 sqm of new employment floorspace. Sites in South Woodford that have come forward for office to residential the SAC. The Council will cooperate with the MoU authorities in order to review the borough's position and account for any new evidence produced over the course of the life of the Plan".ial space Local Plan Policy LP15 'Managed Workspace' aims to provide new business space within new mixed-use schemes, including where such schemes come forward on non-designated employment land. |
| R00108/R3             | Nicky Tranmer, South Woodford Society | MM13                     | 3.6.5               | Pleased MM13 removes reference to "contemporary landmark" however proposed reduction from 651 to 430 new homes will still not meet the "character of the area". Would be unprecedented and dominate the skyline. Tall buildings only way to achieve proposed volume of housing.   | The proposed level of new housing in South Woodford can be met through a variety of housing typologies and design solutions, and does not automatically necessitate the need for tall buildings. With regard to local character Policy LP33 resists development that threatens heritage and character, and MM3 proposes supporting text to key policy LP1 'Spatial Development Strategy' that strengthens the Council's commitment to protect heritage and character in the borough.  |
| R00108/R4             | Nicky Tranmer, South Woodford Society | MM56                     | LP29                | Note proposed downward revision (MM56) for amenity space in flatted developments - how will this create high quality housing when it is designed to maximise units per square metre?  | The Council's position on this issue is made clear in document CED030 (question iv). Under the Redbridge Local Development Framework (2008) private amenity space and communal amenity space standards based on numbers of habitable rooms proved difficult to achieve in practice. MM56 of Council document CED 058 applies nationally described space standards to Policy LP29 'Amenity and Internal Space Standards', which is considered to be a more appropriate mechanism to enable the delivery of individual sites and provides more flexibility to the policy overall. The application of national standards is considered necessary to help meet local housing need, All relevant Local Plan policies will be taken into consideration when making decisions on new development in the borough, in particular Policy LP26 'Promoting High Quality Design' will be a leading policy consideration where the overall design of schemes will be scrutinised.   |
| R00108/R5             | Nicky Tranmer, South Woodford Society | None                     | None                | Scale of proposed residential development will be at cost to community of South Woodford, there is insufficient infrastructure to cope with the changes. High density housing causes destruction of communities.  | MM11 updates Policy LP1D 'South Woodford Investment and Growth Area' identifying the key infrastructure required to support growth which is considered adequate to support the level of growth proposed for South Woodford.   |
| R00132/R1             | City Gates School Trust               | MM7 and MM74             |                     | Concern that proposed Modifications reduce the opportunities for new schools, and the Trust strongly objects to the removal of the Primary School from Goodmayes / King George Hospital (MM7) as this could prejudice the ability of the Trust to open an all-through school.   | Noted. The proposed modification is supported by the Infrastructure Delivery Plan (LBR 2.21).   |
| R00132/R2             | City Gates School Trust               | MM9 and MM74             |                     | Support for proposed MM9 for addition of a Secondary School to Billet Road and suggests this is expanded to also include a primary school. Trust supports inclusion of Ley Street Car Park and bus depot into the plan and provision of a Primary School on that site.  | Support noted.  |
| R00325/R1             | Mark Furnish, Sport England           | MM8 and MM15             | LP1B LP1E           | The modifications to LP1B and LP1E have removed both Oakfield Playing Field and Ford Sports Ground development sites from the Local Plan however Sport England cannot locate modified versions of figures 8 and 11 that indicate both these playing fields, and supporting infrastructure, are not within these designations. This would mean the local plan is self-contradicting. | Support noted for the removal of both Oakfield and Ford Sports Ground as Development Opportunity Sites. CED059 - Additional Modifications - AM7 and AM9 propose to remove the Development Opportunity Site and supporting infrastructure designations from figures 8 and 11 respectively.   |

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| R00325/R2             | Mark Furnish, Sport England  | None                     | None                | Sport England expects that these sites should be safeguarded/designated as playing field to protect them from any loss.<br><br>Proposed modified text suggests a standards approach to new provision, this does not consider complexities of sports provision. Document LBR 1.02 should be modified.  | Noted. The sites existing designation of Green Belt will be retained. The sites will be 'protected' in accordance with this designation and the existing playing fields will be 'protected' in accordance with NPPF paragraph 74 and 75.  |
| R00325/R3             | Mark Furnish, Sport England  | MM62                     | L35 and 6.2.4       | The modifications do not address the other comments raised in Sport England's original reps. These include issues relating to schools, integrated approach to Health and Wellbeing, achieving quality design and promoting a green environment.   | In relation to previous comments made see reg 19 responses R00325/12, R00325/13, R00325/14 and R00325/15.   |
| R00360/R1             | Jeremy Dagley, Epping Forest Conservators                          | MM68                     | LP39                | Main Modifications welcomed as they address "in combination" issues, however LP39 itself remains the same. Suggested change to LP39 1a) as follows: "(a) Not permitting development which would adversely affect the integrity of Epping Forest SAC, either alone or in combination (including trans-boundary impacts), except for reasons of overriding public interest, and then only where adequate mitigation and compensatory measures are provided. The potential for impacts, including 'in combination' impacts, from any proposed developments will be scrutinised, ensuring a screening assessment under the Habitat Regulations Assessment is carried out where there is evidence of likely significant effects. Any trans-boundary impacts on the SAC will be examined and the Council will endeavour to work with its neighbouring authorities, Natural England and The Conservators of Epping Forest to pro-actively avoid or mitigate any such adverse impacts". | The suggested additional text to 1 (a) of policy LP39 is considered too detailed for policy. The proposed text included within MM68 adequately addresses this point. No further change required.  |
| R00360/R2             | Jeremy Dagley, Epping Forest Conservators                          | MM68                     | 6.6.2               | Wording appears to embed a "project by project" approach rather than allow for a strategic "in combination" overview that would address cumulative impacts.   | The intention of MM68 is to explain in more detail the types of mitigation and/or compensation measures the Council will consider when addressing the potential impact on Epping Forest SAC. <b>No further change required.</b>   |
| R00360/R3             | Jeremy Dagley, Epping Forest Conservators                          | MM68                     | 6.6.2               | Justification given in CED031 for 2km boundary not reflected in proposed new text in MM68.  | The intention of MM68 is not to justify the 2km boundary but instead explain in more detail the types of mitigation and/or compensation measures the Council will consider when addressing the potential impact on Epping Forest SAC. No further change required.   |
| R00360/R4             | Jeremy Dagley, Epping Forest Conservators                          | MM68                     | 6.6.2               | Modification regarding SANGs and SAMMs welcomed. Look forward to new Planning Obligations SPD.  | Support noted.  |
| R00360/R5             | Jeremy Dagley, Epping Forest Conservators                          | MM69                     | LP39                | Welcome clarifications in MM69 regarding supporting text for LP39 on Air Pollution; would have preferred policy itself to be reworded as would have greater weight.   | Clarification on this issue is more relevant for inclusion in supporting text rather than policy. No further change required.   |
| R00360/R6             | Jeremy Dagley, Epping Forest Conservators                          | MM67                     | LP39                | Welcome strengthening of policy regarding nature conservation and ecological networks. Important Local Authorities work with others given levels of wildlife loss.  | Support noted.  |
| R00411/R1             | David Stephens, Seven Kings and Newbury Park Residents Association | MM6                      | LP1B 3.4.7          | Part of the amendment to paragraph 3.4.7 shows only the words 'The Ford Sports' struck through. The word 'Ground' should also be struck through.  | Agreed. Remove the word 'ground' from paragraph 3.4.7 as part of a minor drafting amendment.  |
| R00411/R2             | David Stephens, Seven Kings and Newbury Park Residents Association | MM30                     | LP8 3.14.4          | The Local Plan needs to provide clarity on what the term 'very special circumstances' means.  | Comment noted. There is no definition of what constitutes "very special circumstances" despite being enshrined in national policy. Its definition is generally a matter for a decision maker and where it has been established is unique to each situation. It should be noted that at present the Council considers that the borough's needs for gypsy and traveller accommodation can be met through allocating 7 additional pitches at the existing site on Forest Road. |

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| R00411/R3             | David Stephens, Seven Kings and Newbury Park Residents Association | MM61                     | 6.1.7 - 6.1.9       | Clarity needed that both Ford Sports Ground and Seven Kings Park are no longer Development Opportunity Sites.   | Noted. To clarify the Ford Sports Ground will be removed as a Development Opportunity Site. Both Ford Sports Ground and Seven Kings Park will be retained as Green Belt. The grammatical error is noted and will be corrected.   |
| R00468/R1             | Iford NOISE  | None                     | None                | NOISE have withdrawn from the Local Plan process. It is considered that the Local Plan has failed to adhere to Section 13 of the Planning and Compulsory Act 2004. The Examination was not conducted in an open, fair and transparent way. The process has failed to consciously take the views of NOISE into account but has privileged representations from residents from more affluent parts of the borough and developers. | Noted. The Council considers that it adheres with Section 13 of the Planning and Compulsory Purchase Act. The Local Plan has been developed to respond to and manage the many planning challenges the borough faces. The Council has prepared a statement of consultation (LBR 1.14) which sets out clearly how, who and when the Council consulted and how these representations were taken into consideration throughout the development of the Local Plan.  |
| R01073/R1             | Planning Potential for Paddy Power                                 | MM33                     | LP11                | Welcome removal of 50 metre radius in LP11 but are still concerned that there is a exclusion from certain types of centre, namely smaller local shopping parades. Suggest wording LP11 (a) as follows:<br><br>"(a) Requiring them to be located within the borough's town centres (Metropolitan, District and Local, <b>Neighbourhood and Retail Parks</b> ) and in accordance with LP10;"                                      | Support noted for part change to MM33. However, the Council consider that betting/gambling shops, money lenders and shisha bars (Sui Generis) should be directed to the boroughs town centres. Neighbourhood and retail parks are not defined as town centres and therefore the Council do not agree with the proposed wording change.   |
| R01073/R2             | Planning Potential for Paddy Power                                 | MM33                     | LP11                | Supporting text has not been updated to reflect proposed changes in wording of policy, especially unevidenced references to "growing concern amongst residents", "undermine[ing] vitality", and "attract[ing] antisocial behaviour". Suggest that unsupported claims within supporting text for LP11 is removed.  | Noted. CED028 sets out the Council position with regards to its concerns in relation to the proliferation of Betting Shops in the borough. The Council consider this supports text referenced in LP11.   |
| R01075/R1             | Johnathan Stoddart, CBRE for Andersons Group                       | MM74                     | Appendix 1          | Support principle of mixed use development but should not be prescriptive re employment and retail floorspace. KGM House should remain in site as can still be part of comprehensive redevelopment, notwithstanding prior approval.   | Support noted. It is made clear in Revised Appendix 1 (LBR 2.06) that capacity on mixed use sites is based on the recommendations of the Local Plan Evidence Base - Employment Land Review (LBR2.33), Retail Capacity Assessment (LBR2.34), the Infrastructure Delivery Plan (LBR2.21), the Primary Care Capacity Plan (LBR2.22) - and site specific circumstances. Anticipated quantum are arrived at using the methodology set out in LBR 2.06 and considered likely outcomes for each site. Employment and retail floorspace provided for allocated sites in the Local Plan are the result of these informed, reasonable assumptions and are not prescriptive. KGM house has already come forward for an office to residential conversion with occupancy taken up and is highly unlikely to be redeveloped during the Plan period.  |
| R01075/R10            | Johnathan Stoddart, CBRE for Andersons Group                       | MM3 and MM60             | 3.2.4 and LP33      | MM3 contrary to approach in MM60. MM3 is not sound as is not consistent with national policy and has not been positively prepared in its ability to assess harm to heritage assets.   | The comment takes MM60 out of context – the modification is an additional sentence to Policy LP33 that takes into account circumstances where a proposal for development that threatens heritage assets may still be granted planning permission. In that respect it brings Policy 33 further in line with the NPPF, but it is not the sole aim and purpose of the policy. MM3 is consistent with Policy LP33, which is aimed at resisting develop proposals that result in harm to or the loss of significance of designated heritage assets. The additional text in MM3 aims to achieve a balanced approach towards growth and the preservation of local character, which is in line with section 12 of the NPPF. It does not prevent development from coming forward and does not add any further constraints on new development as character and conservation matters are a material consideration when making decisions on proposals for new development. |
| R01075/R2             | Johnathan Stoddart, CBRE for Andersons Group                       | MM11                     | LP1D                | Proposed reduction from 650 to 430 homes in South Woodford IGA is contrary to Policy LP2 and general direction from the Government.   | Noted. As per the methodology set out in LBR 2.06, a reassessment of individual site capacities in South Woodford was undertaken and account taken of sites that could deliver an element of employment use. The Council is committed to retaining employment on key strategic sites in order to encourage employment and local businesses in helping to achieve the overall policy objectives of the Local Plan.  |

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| R01075/R3             | Johnathan Stoddart, CBRE for Andersons Group | MM12                          | 3.6.4               | Housing sites should not be compromised in favour of commercial land uses; residential element of mixed use should be maximised.  | MM12 is very clear in the Council's approach to achieving investment and growth. Encouraging investment and growth demands a balanced approach and is not simply about encouraging residential uses alone. In order to maintain vibrant town centres the Council must plan to strengthen the role of retail, commercial and business uses in investment and growth areas. As stated in the modified supporting text the objective is to increase commercial activity, create jobs and strengthen the local economy through mixed use development, as well as delivering new homes. The proposed modified text strengthens the overall policy approach to that end, but does not compromise the delivery of housing.   |
| R01075/R4             | Johnathan Stoddart, CBRE for Andersons Group | MM13                          | 3.6.5               | Removal of term "landmark building" not supported, especially as it does not necessarily mean "tall building".  | The Council has already responded to this issue in Examination document CED010 where it was stated that the removal of the term 'landmark building' does not affect housing capacity on the Station Estate site, and the justification for making the modification is to remove any ambiguity regarding the Council's objectives for the site, which is to achieve a high quality, mixed use development scheme.  |
| R01075/R5             | Johnathan Stoddart, CBRE for Andersons Group | MM21                          | Figure 12           | Outcome of various proposed modifications is a reduction in housing supply (mostly due to the removal of Ford Sports and Oakfields). This reduction does not meet overall approach or sentiment of the Government or Mayor regarding housing delivery / need. Emerging London Plan will see targets rise considerably, flexibility should be built into the Local Plan. | The removal of Oakfield and the Ford Sports Ground doesn't compromise the ability of the Plan to meet and exceed the current London Plan target. Policy LP2 demonstrates that the Plan has the capacity to deliver 17,237 new homes over the plan period which meets and exceed the target of 16,845. As such, the Local Plan has sufficient flexibility built in to deal with changing circumstances.  |
| R01075/R6             | Johnathan Stoddart, CBRE for Andersons Group | MM5, MM6, MM10, MM11 and MM15 | LP1A to LP1E        | Proposed modification to policies LP1A to LP1E: "In order to deliver growth and regeneration in Investment and Growth Area> the Council will seek the following <u>minimum</u> levels of growth".   | Main modifications MM2 and MM4 include additional text for Policy LP1 and for the supporting text to the policy making it clear that the quantum of development proposed for opportunity sites in the Local Plan is indicative. Numbers are not prescribed or represented as a maximum [or minimum], and development is expected to deliver the indicative quantum. Other modifications proposed for Policies LP1A - LP1E also include text that show figures for new housing and additional retail floorspace etc. as approximations. This is made clear throughout the text in this section of the Plan and the use of the words 'the Council will seek the following quantum of development' within Policies LP1A-LP1E is entirely consistent with the approach taken in the Plan. Therefore there is no need to make the proposed additional change as it is clear that site by site levels of development in the Plan are indicative and there may be some flexibility with regard to achieving greater intensification. |
| R01075/R7             | Johnathan Stoddart, CBRE for Andersons Group | MM23                          | LP3 and 3.9.5       | MM23 supported in principle with revised wording to part (b). However, all housing should be in conformity with London Plan density matrix, not just affordable housing.  | Support noted and welcome. This modification is specific to affordable housing. Para 3.8.13 makes it clear that all housing should be in accordance with the Mayor's Density Matrix.  |
| R01075/R8             | Johnathan Stoddart, CBRE for Andersons Group | MM18                          | LP2                 | Proposed modification to policy LP2 part c: "(c) Making effective and efficient use of land by promoting higher density development in highly accessible locations such as Investment and Growth Areas in <del>regard to</del> <u>accordance with</u> the London Plan Density Matrix".  | It is considered that the Policy is clear enough on the relevance of the London Plan density matrix to intensification. MM18 relates to LP2(b) and not (c). However, we agree that "in accordance with" is grammatically correct. Suggest this change is made as part of the final publication of the Local Plan.   |
| R01075/R9             | Johnathan Stoddart, CBRE for Andersons Group | MM36                          | LP15                | Proposed engagement with managed workspace providers at design stage should be on site specific basis.  | The proposed modified criterion in the implementation section of Policy LP15 'Managing Workspace' is aimed at replacement or new mixed use development in Business Areas or non-designated employment sites, to ensure there is no net loss of existing jobs, as highlighted in the supporting text of the policy at paragraph 3.22.3. The proposed text is sufficient. There is no need to include "on site specific basis".   |
| R01079/R1             | CBRE for Bancrofts School                    | MM8 and MM17                  | LP1B and LP1E       | Removal of Oakfield and Ford Sports Ground as development sites, and failure to maintain housing supply, does not represent a positively prepared plan or reflect the Mayor or Government's approach to increasing housing supply and meeting need.   | The Council has demonstrated that it has identified sufficient capacity to meet and exceed the minimum housing requirement and 'close the gap' on housing need in accordance with policy 3.3 of the currently adopted London Plan. The Council's housing trajectory clearly demonstrates that it can meet is housing requirements over the plan period and that it has a five year land supply.   |



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| R01079/R2             | CBRE for Bancrofts School        | None                     | None                           | Emerging London Plan and 76% increase in targets means a further Green Belt review is justified to identify further sites.  | Noted. The Council has sought to be in general conformity with the adopted London Plan.  |
| R01080/R01            | Iceni for Ford Motor Company     | None                     | None                           | Concern that in regard to playing pitch provision, an "either/or" situation has not been considered within the Main Modifications, and instead the Inspector has assumed that neither Oakfield or the Ford Sports Ground should be released from the Green Belt. Ford Sports Ground Should be assessed on its own merits.   | Noted. CED050 did assess a scenario where only Ford Sports Ground was brought forward for development. The Inspectors advised that in spite of this it has not been demonstrated that playing pitch provision would meet estimated demand across the Borough.  |
| R01080/R02            | Iceni for Ford Motor Company     | MM8                      | Ford Sports Ground Policy Box. | Objection to the Main Modifications proposed which result in removal of the Ford Sports site as a development opportunity site. Site no longer performs five key purposes of Green Belt land as defined by NPPF, is required to meet LBR housing target as defined by the OAN, and feasibility work has been requested by Sport England to demonstrate sufficient replacement of existing sports pitches.   | Noted. Whilst the Council maintain its position in regards to the Green Belt Review (LBR 2.41), CED053 demonstrates that the Council can meet the housing requirements of the adopted London Plan without the need to include the Ford Sports Ground as part of the housing provision.                               |
| R01080/R03            | Iceni for Ford Motor Company     | None                     | None                           | New London Plan may result in increased housing target, historic under provision of new dwellings in the borough should be afforded significant weight.   | The Local Plan has been prepared in accordance with the adopted 2016 London Plan. The Housing Trajectory incorporates a 20% buffer (and no reliance on windfall) in the first five years to account for historic under-delivery; the "front loading" of the housing trajectory will help to increase housing supply. |
| R01080/R04            | Iceni for Ford Motor Company     | None                     | None                           | Principle for relocation of Ford Sports pitches established in Playing Pitch Strategy. This was produced in accordance with Sport England methodology and concluded that there was potential for reconfiguration of pitch space within the borough, along with extra capacity from upgraded pitches that allow for more intensive use. Recommended reinstating pitches on site including the southern part of Ford Sports Ground, Seven Kings Park, and land between the two sites.   | Noted.   |
| R01080/R05            | Iceni for Ford Motor Company     | None                     | None                           | Further work undertaken; no acknowledgement of the replacement sports pitches which are to be provided within the residential masterplan for the Ford Sports site. Sport England raised various concerns, but says that the case for Ford Sports Ground closing is not proven, rather than definitively stating that it should not be lost.   | Noted.   |
| R01080/R06            | Iceni for Ford Motor Company     | None                     | None                           | LBR statement implies that time is required to resolve all issues in regard to the redeployment of pitch usage from the Ford Sports Ground and that by implication additional work will be required. The Main Modifications consultation has not afforded this.   | Noted.   |
| R01080/R07            | Iceni for Ford Motor Company     | None                     | None                           | Sport England introduced new arguments at the EiP that focussed on an equivalent area of playing field land, rather than equivalent pitch capacity (which can include making more intensive use of a smaller area); and the inclusion of informal sport and recreation that uses playing fields, rather than just formal teams on marked pitches. Whilst this reflects a policy shift, this muddies the waters as there are no accepted mechanisms of assessing the impact of informal demand.  | Noted.   |
| R01080/R08            | Iceni for Ford Motor Company     | None                     | None                           | "In principle" support in PPS for loss of pitches at Ford Sports Ground subject to re-provision. Favoured site was on part of the Ford Sports Ground, Seven Kings Park, and land in between. Despite this, and independent of the PPS Steering Group, LBR commissioned two feasibility studies to seek to demonstrate that Ford pitches could be re-provided at the Goodmayes Park Extension.<br><br>These findings criticized by Sport England and relevant governing bodies. Land adjoining Ford Sports Ground, Seven Kings Park, and land in between has never been properly tested. Consultation with PPS consultant and Essex FA indicate there is merit to a feasibility study to address this. | Noted.   |

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| R01080/R09            | Iceni for Ford Motor Company       | None                     | None                | Request for extension of time to enable the principle of relocating pitch provision at Ford Sports Ground supported by the adopted PPS to be tested by a robust feasibility study. Should examine southern part of Ford Sports Ground, Seven Kings Park, and land in between; and be collaborative with PPS Steering Group and constituent members.<br><br>Study would take 12-16 weeks to complete, request extension to post-examination consultation to allow work to be undertaken and presented to Inspector. Only at this point can evidence be regarded as "sound".  | Noted. The Council consider that sufficient time has already been allocated to provide evidence to support proposals. Modifications MM8 proposes to remove the Ford Sports Ground as a Development Opportunity Site. Further feasibility work is therefore not required to support this modification.  |
| R01080/R10            | Iceni for Ford Motor Company       | MM18                     | LP2                 | Excluding Ford Sports Ground from sites would result in borough being further away from OAN. Revised phasing reduces delivery in Investment and Growth Areas with increased reliability on other, non-strategic sites; this is contrary to Policy LP2. Site would contribute 850 new homes, secondary school provision, and some retained sports pitch provision.   | Noted. The Council can meet its housing, infrastructure and playing pitch requirements despite the removal of the Ford Sports Ground as a Development Opportunity Site.  |
| R01080/R11            | Iceni for Ford Motor Company       | MM6                      | LP1B                | Elimination of Ford Sports Ground and reduction of units at Billet Road as part of Main Modifications is inconsistent with increase in delivery in policy LP1B for Crossrail Corridor from 4,700 to 4,850 homes.  | Noted. In response to the Inspector's Council Update (IED007) the Council has reviewed site capacity of all sites in the borough (LBR 2.06). This process identified incremental increases in a number of sites located within the Crossrail Corridor. In addition, additional sites were promoted during Reg 19 consultation and included as additional sites within appendix i further increasing housing capacity within the Crossrail Corridor.  |
| R01080/R12            | Iceni for Ford Motor Company       | MM27                     | LP5 and 3.11.7      | Removal of Ford Sports Ground will undermine efforts for family sized dwellings.  | Noted. See response R01083/R6.   |
| R01080/R13            | Iceni for Ford Motor Company       | None                     | None                | All the Green Belt assessments conducted to date by an independent consultant conclude that parcel GB16 [Ford Sports Ground] is suitable for release as they do not meet the Green Belt tests in the NPPF, which advises that authorities should consider long term performance of Green Belt boundaries. Exceptional circumstances exist in the allocation and delivery of a new secondary school. LBR has an OAN greatly exceeding the Local Plan target, and the Mayor of London may as of yet increase the housing targets in the new London Plan.  | Noted.   |
| R01083/R1             | Andrew Blackwell, for Todcharm Ltd | MM19                     | 3.8.4 and 3.8.5     | Objection to the overall housing target for the borough being reduced;<br><br>The Local Plan and supporting Green Belt Review 2017 (LBR 2.41) denies the opportunity for other Green Belt sites contributing to meeting the Council's housing need.<br><br>The Redbridge Local Plan modifications are therefore inconsistent with the objective to provide new housing supply best able to meet objectively assessed housing need and with alterations to the Green Belt boundary as an exceptional circumstance.<br><br>The Redbridge Local Plan, as modified, fails to apply fair assessment to housing need and permanent Green Belt boundaries. It therefore remains unjustified and not effective. | Noted. The reduction in housing numbers is essentially due to the removal of Oakfield and the Ford Sports Ground as Development Opportunity Sites and a reduction in capacity at the Billet Road site. The Council maintains the findings of the Green Belt Review 2017 (LBR2.41) in relation to these sites. As set out in the Inspector's post hearing advice, in order to deliver sustainable development in the borough, Oakfield and Ford Sports Ground were removed to ensure the borough could provide sufficient playing pitch provision over the plan period. These Modifications therefore balance the need to meet the boroughs housing requirements with those to meet its playing pitch requirements.<br><br>The Council's position in relation to Green Belt and 'exceptional circumstances' is set out in CED013. The Council consider that its approach to housing need is in accordance with policy 3.3 of the London Plan. |
| R01083/R10            | Andrew Blackwell, for Todcharm Ltd | MM61                     | 6.1.7 and 6.1.8     | To render the emerging Local Plan sound reference to land south of Roding Hospital should be included within paragraph 6.1.7 and 6.1.8.   | Noted. See response R01083/R7.   |

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| R01083/R11            | Andrew Blackwell, for Todcharm Ltd | MM11                     | LP1D                | <p>Objection is raised to MM11 where the housing target for Policy LP 1D should be adjusted to provide an addition 60 homes from the land south of the Hospital at Roding Lane South i.e. New Homes 490.</p> <p>Figures 22 and 23 and the Policies Map should be amended to bring them into line with the suggested Amendments Plan (figure 6) in the Green Belt Statement provided with representation RO/1083.</p> <p>Roding Lane South should be included as a Development Opportunity Site (for housing within Phase 1 and with an indicative development capacity of 60) within Appendix 1 to the Plan.</p>  | Noted. See responses R01083/R1 and R01083/R7.   |
| R01083/R02            | Andrew Blackwell, for Todcharm Ltd | None                     | None                | <p>The Inspector's post hearing advise does not sit in isolation from evidence that objectively assessed housing need which is likely to be higher than the minimum housing requirement [set by the Greater London Plan] by fresh projections.</p> <p>These higher figures are offered in the recent [September 2017] Government consultation paper "Planning for the right homes in the right places". These figures give an indicative assessment of housing need for Redbridge as 2,981 per annum for the period 2016-26 compared to Redbridge's figure of 2,286. Although these figures are not required for emerging development plans already submitted for examination, the housing deficit is 30% and therefore sufficiently large for this stage of the review Local Plan to still consider.</p> <p>It is a missed opportunity to not release further land when the allocated provision is so low when set against earlier objectively assessed housing need. It is also a demonstration that not all reasonable options have been considered.</p> | Noted. See response R01083/R1. The Council maintain the findings of the Green Belt Review 2017 (LBR 2.41) and preceding studies which clearly have assessed a range of parcels (sites) against the purposes of Green Belt as set out in the NPPF. As set out in CED013, the Council considers that it does have 'exceptional circumstances' to alter its green belt boundary. Sites which were identified as not meeting any of the purposes of Green Belt have been proposed for alternative uses. The Green Belt review undertook a comprehensive review of the borough's Green Belt. All sites located within Green Belt which were promoted for development through the Local Plan process were reviewed.   |
| R01083/R03            | Andrew Blackwell, for Todcharm Ltd | MM21                     | Figure 12           | <p>The Redbridge Housing trajectory 2015-2030 identifies an anticipated sharp rise in house completions between 2017 and 2022, significantly above many earlier years which is considered to be optimistic.</p> <p>The reliance on the need to preparation planning briefs on key sites to facilitate site development will further undermine this optimistic housing trajectory.</p> <p>Redbridge then anticipate a severe decline in net housing completions from the year 2022 onwards and well below the London Plan target at year 2024/25.</p> <p>It is considered short sighted to dismiss additional land that is demonstrably ill-suited to be retained as Green Belt.</p>   | <p>Comment noted. The housing trajectory (CED053) clearly demonstrates that the Council can meet its minimum housing requirements over the plan period. It is based on the most up-to-date planning information. It will be reviewed, through the AMR, annually to monitor progress.</p> <p>The Council's windfall figure has been derived from the SHLAA (2013) and is consistent with recent past housing data (CED12).</p> <p>Sites where planning briefs are proposed to be produced have been phased accordingly to ensure sufficient time for their preparation to ensure sites come forward in a co-ordinated manner.</p> <p>As set out in CED013 the Council sets out its position in regards to the borough's Green Belt and 'exceptional circumstances'. To reiterate, the Council maintains the findings of the Green Belt Review 2017 (LBR2.41). The Council has allocated sites which it considered not to meet any purposes of Green Belt for alternative uses.</p> |
| R01083/R04            | Andrew Blackwell, for Todcharm Ltd | None                     | None                | <p>The Local Plan cannot reasonably future proof the housing needs of a Borough by a 2% theoretical surplus to the minimum requirements of the London Plan, which itself is about to be reviewed. It directly contravenes the NPPF paragraph 14.</p>  | Noted. The aim of the Local Plan is to deliver sustainable development in the borough. It is acknowledged that there are a number of competing demands to achieve this. The Council consider that the proposed modifications meet the requirements of London Plan policy 3.3 and achieve the appropriate balance between meeting its housing requirements with that of other objectives to achieve sustainable development. The Council approach is therefore in accordance with paragraph 14 of the NPPF.  |



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| R01083/R05            | Andrew Blackwell, for Todcharm Ltd | None                     | None                | <p>The GLA gave evidence on Day 2 (Issue 5) to show how the previously proposed housing target in the Submission draft of the Local Plan was too low to represent an acceptable gulf with "objectively assessed housing need. "The reduction of the overall Local Plan housing capacity therefore undermines its effectiveness in meeting assessed housing needs.</p> <p>Concern that Redbridge now leaps to an application of higher density provision when it stated in a Statement of Common Ground with the GLA (reference: representation No: R01213/12) the following: "However, further intensification of these [brownfield] areas is likely to have a significant impact on the Borough's key transport junctions and links, character, townscape, sustainability ...".</p> | <p>Noted. The Council has demonstrated that it has identified sufficient capacity to meet and exceed the minimum housing requirement and 'close the gap' on housing need in accordance with policy 3.3 of the London Plan.</p> <p>In response to the Inspectors Update (IED007) the Council prepared an update to document LBR 2.06 and 2.06.1 to set out its position on housing density and site numbers. As clearly set out, densities applied are in accordance with the London Plan Density Matrix. The Council's concern, as referenced in R01213/12, related to the application of densities above those proposed in the London Plan Density Matrix.</p> |
| R01083/R06            | Andrew Blackwell, for Todcharm Ltd | MM27                     | LP5 and 3.11.7      | <p>Objection is made to MM27 and the Council's expressed aspiration for higher density living from the Opportunity Sites is a U-Turn from previous emphasis on family housing / living.</p> <p>This aspiration is more likely to be delivered in land poor suited to Green Belt is allocated for new family oriented housing.</p> <p>If the Local Plan is to be effective in meeting housing need there must be a substantial housing target that at least replaces the houses expected from the removed sports grounds.</p>   | <p>Noted. The Council see no contradiction in the additional text provided in MM27. It is clear from LP5 that the Council are, "focussing on the provision of larger family homes...". The additional text referenced in modified paragraph 3.11.7 clearly sets out that flexibility maybe required in the application of the policy and strengthens the Council approach to requiring an element of family housing from all types of housing development.</p> <p>The modified policy also notes specific Green Belt sites where the dwelling mix is expected to be met.</p>  |
| R01083/R07            | Andrew Blackwell, for Todcharm Ltd | None                     | None                | <p>It is considered that as demonstrated at the Local Plan hearings there is additional green belt land which fails to meet the purposes of Green Belt, including the Roding Lane South site. The Green Belt Review (2.41) improperly assessed the Green Belt by an inconsistent approach with the immediate adjoining boundaries around the Roding Hospital area.</p> <p>The Council clearly state in response to R01213/12 that it cannot meet its housing requirements without the release of Green Belt.</p>   | <p>Noted. The Council maintains the findings of the Green Belt Review 2017 (LBR2.41) in relation to the Roding Hospital Site. To reiterate, as set out in CED013 the Council sets out its position in regards to the borough's Green Belt and 'exceptional circumstances'. The Council is of the view that it does have exceptional circumstances to amend the Green Belt. The Council has made no 'U-turn' since the examination and still proposes to release green belt where it considers in line with NPPF paragraph 83.</p>   |
| R01083/R08            | Andrew Blackwell, for Todcharm Ltd | None                     | None                | <p>For the Redbridge Local Plan to be consistent with the strategic direction offered by the GLA, it is required to close the gap with the OAN and protect the Green Belt where appropriate. Land not meeting NPPF requirements for Green Belt land should be released.</p>  | <p>Noted. For the Local Plan to be in accordance with the London Plan (GLA), it needs to meet the requirements of London Plan policy 3.3. To reiterate, the Council has demonstrated that it has identified sufficient capacity to meet and exceed its London Plan minimum target and 'close the gap' on housing need.</p> <p>As set out in CED013 the Council sets out its position in regards to the borough's Green Belt and 'exceptional circumstances'. To reiterate, the Council maintains the findings of the Green Belt Review 2017 (LBR2.41).</p>  |
| R01083/R09            | Andrew Blackwell, for Todcharm Ltd | MM61                     | 6.1.7 - 6.1.9       | <p>Housing need is being inadequately met by a) a reduction in acknowledged housing capacity and b) an uncertain reliance on higher density assumptions from sites not fully identified but required to be informed by planning briefs yet to be prepared. This is incompatible with failing to release land unsuitable for continued designation as Green Belt. Therefore objection is maintained in respect of paragraph 6.1.7-6.1.9 and modification MM 61.</p>   | <p>Noted. See response R01083/R1 and R01083/R7.</p>   |
| R01087/R1             | Bidwells for NELFT                 | MM61                     | 6.1.8               | <p>Fully support additional paragraph to recognise importance of King George / Goodmayes Hospital.</p>   | <p>Support noted.</p>   |
| R01087/R2             | Bidwells for NELFT                 | MM7                      | LP1B                | <p>NELFT request flexibility regarding former Mental Health Asylum Buildings - conversion desired but may not be possible. Request to amend Policy LP1B a) as follows: "The conversion and re-use of non-designated historic assets will enable provisions [sic] of new homes. This will include conversion of former Mental Health Asylum Buildings <b>unless it can be demonstrated that it is neither feasible or practical.</b>"</p> <p>NELFT committed to ongoing dialogue and delivery.</p>  | <p>Noted. It is considered that the proposed amendment is unnecessary for soundness.</p>  |

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| R01090/R1             | Chris Gannaway, Redbridge Group London Wildlife Trust | MM66                     | 6.4.5               | Proposes a further modification to ensure the Policies map, figure 25 and paragraph 6.4.5 clearly show SINCs; and<br><br>Seeking direction from the Inspector that the Redbridge SINCs be fully validated and updated prior to the Local Plan adoption.  | Agreed. Amended title of new Figure 25 " Sites of Importance for Nature Conservation (SINC's) & Areas of Deficiency for Nature" .<br><br>Noted.  |
| R01091/R1             | Sam Metson, Bidwells for BHRUT                        | MM7 and MM74             | LP1B                | BHRUT fully supports Policy LP1B's proposed removal of its surplus land at King George Hospital from the Green Belt and its proposed allocation for housing led development (Reference: Site Number 46, as it appears in the list of Allocated Major Sites).   | Support noted.   |
| R01091/R2             | Sam Metson, Bidwells for BHRUT                        | MM7                      | LP1B                | BHRUT therefore fully supports the modifications made to Policy LP1BA (Modification: MM7) and is satisfied that they align with the objectives of the Trust.   | Support noted.   |
| R01097/R1             | Natural England                                       | MM67                     | LP39                | Natural England does not consider that these modifications pose any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment on this consultation.<br><br>Subsequent to NE earlier submission, a second representation was submitted. We recommend that the additional text regarding the Epping Forest SAC, SANGs and SAMMs is incorporated into Policy LP39 rather than the supporting text in paragraph 6.6.2 to ensure the plan is compliant with the Habitat Regulations (2010).  | The Council considers the additional text proposed through MM68 is more appropriate for inclusion in supporting text rather than policy. Including the text in supporting text doesn't render it any less compliant with the Habitats Regulations (2010). No further change required.  |
| R01097/R2             | Natural England                                       | None                     | None                | Natural England would like to draw to the Inspector's attention an MoU between Natural England and the City of London Corporation, Epping Forest DC, East Hertfordshire DC, Harlow DC, Uttlesford DC, Essex CC, and Hertfordshire CC; which relates to management of the impact on predicted housing growth on Epping Forest SAC.  | Noted. The Council is aware of this MoU and will continue to engage with the group on matters that relate to the management of impacts of predicted housing growth on Epping Forest SAC.   |
| R01097/R3             | Natural England                                       | MM68                     | 6.6.2               | Whilst modifications in Section 6.6.2 seeks to account for impact on recreation and traffic related air pollution, it may be beneficial for the Council to consider how it intends to relate to the MoU in the future. The evidence gathering from the MoU linked mitigation strategy could result in the 2km buffer zone being insufficient, and the scale of proposed mitigation being inadequate. Natural England believe that to be sound, the Plan should incorporate suitable policy and supporting text to acknowledge imminent formation of a joint Mitigation Strategy, and should commit to cooperating with the MoU authorities and account for new evidence produced through the course of the Plan. | The Council agrees that reference should be made to the formation of the MoU but considers this wording is more suitable in the supporting text rather than policy LP39. This would still ensure the Plan is effective demonstrating the Council's effective working with Epping Forest DC and other authorities in the MoU.<br><br>Add a new paragraph to the end of MM68 to read:<br><br>"In addition to the above, a Memorandum of Understanding (MoU) between Natural England and the City of London Corporation (Conservators of Epping Forest), Epping Forest District Council, East Hertfordshire District Council, Harlow District Council, Uttlesford District Council, Essex County Council and Hertfordshire County Council has been established which relates to the management of impacts of predicted housing growth on Epping Forest SAC. The aim of the MoU will be to collect data and robust evidence on which to base a strategy for the protection of Epping Forest SAC. The joint strategy will relate to both air pollution and recreational impacts on the SAC. The Council will cooperate with the MoU authorities in order to review the borough's position and account for any new evidence produced over the course of the life of the Plan". |
| R01101/R1             | Savills for Capital and Regional (The Exchange)       | MM74                     | Appendix 1          | Welcomes allocation of The Exchange for being primarily retail led, with secondary leisure uses, and mutual understanding with the Council with regard to its importance to Ilford Town Centre.  | Support noted.   |

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| R01101/R2             | Savills for Capital and Regional (The Exchange) | MM22                     | 3.8.13                | Support for additional paragraph at 3.8.13 to recognise that quantum of development is indicative and not a cap or limit, in recognition of increased London Plan targets: "The recognition that the housing figures are not a maximum is in accordance with Policy 3.3 of the London Plan which states that Boroughs 'should seek to meet and exceed minimum borough annual average housing targets'. MM22 will help meet Policy LP2 of the emerging LP which identifies a <b>minimum target</b> from the London Plan of 16,845 new dwellings in the period 2015 to 2030. The absence of a cap will support and facilitate the provision of housing in line with the significantly increased housing target for Redbridge which is 1,979 dwellings per annum." | Support noted.  |
| R01104/R1             | Jesse Honey, AECOM for East Thames              | MM9                      | LP1B                  | Support the Council's ambition and boldness in meeting the clear, evidenced need for significant housing growth through the Crossrail Corridor Investment and Growth Area and targeted Green Belt review.   | Support noted.  |
| R01104/R2             | Jesse Honey, AECOM for East Thames              | MM9                      | LP1B                  | The Council's approach is supported by the Local Plan Inspector on the basis of the available evidence and national policy. Support the Inspector's Main Modifications to Policies LP1 and LP1B, in particular the recommended decrease in housing numbers across the site from 1,100 to 800 dwellings. This will allow for a context sensitive development with new school and open space  | Support noted.  |
| R01104/R3             | Jesse Honey, AECOM for East Thames              | MM9 and MM74             | LP1B                  | The proposed Main Modifications to the Local Plan insofar as they affect the Billet Road allocation are sound, justified, effective and consistent with national policy.  | Support noted.  |
| R01123/R1             | Highways England                                | MM46                     | 4.9.5                 | Highways England have concerns regarding the cumulative effect on the M25 junctions 27 to 30, and M11 junction with A406. The Council will need to provide evidence regarding impact / propose mitigation measures. Concerned that cumulative impact is likely to be overlooked, as a 300 unit scheme will have little impact but the 6000 homes proposed for Ilford could impact the A13 and its junction with the M25.  | The Transport Assessment (TA) that supports the Local Plan has considered the impact of development upon the A13 and includes some potential mitigation measures to overcome any significant impact. The A13 junction with the M25 is remote from Ilford and housing here is targeted to London jobs so there is no obvious connection. The junctions studied in the TA were done so to identify hard improvements necessary so these could be costed (in further studies) and allocated to development pro rata. Furthermore, soft measures will be included as part of the DM process as sites come forward for delivery. |
| R01168/R01            | Kevin Page, London Green Belt Council           | None                     | None                  | Removal of Ford Sports Ground means that Crossrail Corridor IGA boundary should be re-drawn.  | Noted. The Council in accordance with the PPS Strategy would support improvement and investment in the facility. The Council maintain it should therefore remain within the Investment and Growth Area.   |
| R01168/R02            | Kevin Page, London Green Belt Council           | None                     | None                  | Crossrail Corridor should exclude Goodmayes Hospital due to Green Belt status, listed building, tree preservation orders, blue ribbon status.   | Noted. The Council position regarding King George and Goodmayes Hospital is set out in CED009. The Council maintain that the site should be removed from the Green Belt.  |
| R01168/R03            | Kevin Page, London Green Belt Council           | MM6                      | LP1B 3.4.10<br>3.4.11 | Crossrail Corridor should be smaller, and without large and tall buildings except along the High Road itself; given downward projections of economic growth and the fact the 15 year housing target has already been reduced. The new draft London Plan will confirm the ongoing need to protect the capital's Green Belt.  | Noted. See response to R01168/R1. The Council's position in regards to tall buildings is set out in CED030. The Council has sought to be in general conformity with the adopted London Plan.  |
| R01168/R04            | Kevin Page, London Green Belt Council           | MM7                      | None                  | London Green Belt Council has severe reservations re Goodmayes Hospital proposals; it should be treated separately to King George Hospital as there are separate trusts and different timescales. Goodmayes Hospital was built prior to Green Belt designation; whereas King George Hospital was built on the green belt when it was designated.  | Noted. As set out in policy LP1B the Council considers that a comprehensive development of the King George and Goodmayes hospital site would better enable delivery of the site in accordance with LP1B. Both sites are phased to come forward in the second phase of the Local Plan.   |
| R01168/R05            | Kevin Page, London Green Belt Council           | None                     | None                  | LB Redbridge has not sought to establish common ground with the London Green Belt Council. Neither NELFT or BHRHT have sought public consultation in regard to the Local Plan. Fact that the Inspector is yet to make a final decision in relation to Goodmayes and Billet Road is not referred to directly in the Main Modifications.  | Noted. Proposals to include King George and Goodmayes Hospital sites as a Development Opportunity Site have been included in previous consultations on the Local Plan (2013 and 2014). The Council's has made it clear that the Main Modifications consultation is part of the Examination process.   |

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| R01168/R06            | Kevin Page, London Green Belt Council | None                     | None  | There is direct reference to the considerable constraints at Goodmayes (listed buildings). In the past the existing footprint of a hospital was treated separately to its playing fields. We welcome proposed open space and an enhanced SINC. However Goodmayes Hospital site is too small to accommodate 500 new homes unless located at the north of the site near the A12 and direct bus links to Newbury Park for the Central Line.   | Noted. The conceptual masterplan found in LBR 2.78 demonstrate that 500 homes can be accommodated on the site as well as appropriate green space and supporting infrastructure.   |
| R01168/R07            | Kevin Page, London Green Belt Council | None                     | None  | There should be a direct bus link to / from Newbury Park station via Aldborough Road and Goodmayes High Road. Without the bulk of housing (largely unaffordable) located elsewhere the Goodmayes Hospital site is too small for a new secondary school. Cannot see how existing hospital open space can be enhance if hemmed in by a secondary school and new health hub.  | Noted. See response to R01168/R6.   |
| R01168/R08            | Kevin Page, London Green Belt Council | MM7                      | King George and Goodmayes Hospital Policy Box | Request MM7 is revised to only modify bullet point 1. The rest of the modification (on page 7) to be deleted unless King George Hospital forms a separate policy box.  | Noted.  |
| R01168/R09            | Kevin Page, London Green Belt Council | MM7                      | King George and Goodmayes Hospital Policy Box | Request MM7 bullet point 7 reads "create an iconic centrepiece / masterpiece for the surrounding neighbourhoods with extensive community and cultural facilities".   | Noted. Proposed wording is unnecessary for soundness.   |
| R01168/R10            | Kevin Page, London Green Belt Council | MM7                      | King George and Goodmayes Hospital Policy Box | Request MM bullet point 8 includes "2 planning briefs for KGH and Goodmayes Hospital".   | Noted. See response to R01168/R4.   |
| R01168/R11            | Kevin Page, London Green Belt Council | None                     | None  | This is because King George site is more urbanised than Goodmayes. Disappointed Redbridge Council has not identified any Metropolitan Open Land or a Green Belt swap.  | Noted.  |
| R01168/R12            | Kevin Page, London Green Belt Council | None                     | None  | Separate policy box needed to replace the Ford Sports Ground - without comprehensive Green Belt protection a standalone Goodmayes Hospital site would be vulnerable to comprehensive housing development.<br><br>This is justified because of the ecologically important Seven Kings Water and its flood risk; and a Grade 1 SINC of borough wide significance, especially given the SINC adjoining the railway has significant building works; and the retention of the Goodmayes playing fields will enable the Council to offset an area of open space deficiency. With fewer houses Redbridge will not fall so far behind its own standards as per its own open space study. We do not see how this can be offset with pocket parks and financial contributions. | Noted.  |
| R01168/R13            | Kevin Page, London Green Belt Council | None                     | None  | Goodmayes Hospital is surrounded by dozens of trees with TPOs, with a rich biodiversity of bird and plant life.<br><br>The grounds incorporate 2 sets of playing fields belonging to Farnham Green Primary School and Chadwell Heath Academy, with no reprovision planned if they are developed.<br><br>In addition to the Barley Lane Allotments much of the grass land has not been intensively cultivated for several decades.  | Noted. As set out in the LBR 2.78 that Council does not propose to redevelop Farnham Green Primary School, Chadwell Heath Academy or Barley Lane Allotments.  |
| R01168/R14            | Kevin Page, London Green Belt Council | None                     | None  | With the retention of Oakfield and even more so Ford Sports Ground, the Inspector has already undermined many of the conclusions of the Council's Green Belt review, which was never put out to public consultation. Further, the Inspector should take into account the loss of Green Belt at Five Oaks Lane, and 10-15 years ago at Chadwell Heath Hospital.   | Noted. Both Oakfield and Ford Sports Ground were removed as Development Opportunity Sites to ensure sufficient playing pitch provision over the plan period. The Council maintains the findings of the Green Belt Review 2017 (LBR 2.41). |

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| R01168/R15            | Kevin Page, London Green Belt Council | MM23                     | LP3 and 3.9.5                | Welcome increase in affordable housing to 35% but unlikely to be achieved without increase in local authority borrowing cap. Severe under delivery of new homes. Just over 2,400 completions since new targets in 2012.  | Support noted.  |
| R01168/R16            | Kevin Page, London Green Belt Council | None                     | None                         | Local Plan envisages over 9,000 homes being built in just 5 years despite prediction of sharp decline in economic growth and personal incomes. Targets will only be achieved with bedroom / garage conversions and large scale out of borough growth.  | Noted.  |
| R01168/R17            | Kevin Page, London Green Belt Council | MM50                     | LP24 and 4.51 - 3 and 4.17.5 | Following Supreme Court ruling MM50 needs to be revised for all major new development. Should be defined as all major development as there is a clause a) referring to over 10,000 sqm retail floorspace or over 100 homes.<br><br>Clause ii Poor Air Quality Area should be expanded to include the A12 Eastern Avenue from Redbridge roundabout to A12 / Barley Lane / Hainault Road junction.   | Noted. The areas of poor air quality noted in part ii of the policy are identified in the Council's Air Quality Action Plan.  |
| R01168/R18            | Kevin Page, London Green Belt Council | MM61                     | LP35                         | Do not accept conclusion of Green Belt reviews, corresponding case for Parcel GB16 to be split between King George Hospital and Goodmayes Hospital.  | Noted. The Council maintain the findings of the Green Belt Review 2017 (LBR 2.41).  |
| R01168/R19            | Kevin Page, London Green Belt Council | None                     | None                         | Borough has sufficient brownfield capacity on over 200 sites to meet housing need for next 10 years. Residential extensions outpacing new housing completions, and this should be taken into account.  | Noted. The Council has demonstrated that meeting its housing requirements cannot be achieved through brownfield land alone. Green Belt land will be required to meet the borough's development needs.   |
| R01180/R1             | Paul Scott                            | None                     | None                         | Modifications are inappropriate as will mean a large amount of high rise as well as high density development within the Ilford, Goodmayes, Seven Kings and Chadwell Heath neighbourhoods;<br><br>The scale of the planned high storey buildings will block daylight and cause congestion, affecting residential amenity;<br><br>Car parking for these developments is insufficient and will lead to overspill on surrounding streets; and<br><br>Council should limit high rise blocks in light of Grenfell Tower. | Comments noted. The density used to determine a sites housing capacity is related to the London Plan Density Matrix. The Council's approach to site housing capacity and densities is set out in document LBR 2.06. Ilford, Goodmayes, Seven Kings and Chadwell Heath are all town centres and intensification of such areas is supported by both national and regional planning policy.<br><br>Parking standards are in accordance with the London Plan.<br><br>The Council's approach to tall buildings has been set out in CED030. Policy LP27 has been modified to reflect the Inspector's post hearing advice set out in IED011.<br><br>The Council's response to the implications of the Grenfell Tower fire on the Local Plan can be found in CED046.  |
| R01209/R1             | Amec Foster Wheeler for National Grid | None                     | None                         | No comments in regard to consultation.   | Noted.  |
| R01211/R1             | Savills for Thames Water              | MM50                     | LP24 and 4.51 - 3 and 4.17.5 | Support MM50 and inclusion of criteria (m), necessary to ensure development delivered alongside wastewater infrastructure in line with NPPF paragraph 20.  | Support noted.  |
| R01213/R01            | Mayor of London                       | MM5                      | LP1A and 3.3.5 - 3.3.7       | Object to lower housing numbers.<br><br>Support the inclusion of a new Cultural Quarter in Ilford.   | Noted. The reduction in housing numbers is essentially due to the removal of Oakfield and the Ford Sports Ground as Development Opportunity Sites which the Mayor supports. As set out in the Inspector's post hearing advice, in order to deliver sustainable development in the borough, the Oakfield and Ford Sports Ground sites were removed to ensure the borough could provide sufficient playing pitch provision over the plan period. As also recognised by the Mayor, the Council accords with London Plan policy 3.3 by meeting its minimum London Plan target as well as seeking to close the gap on housing need. LBR2.06 sets out the Council's methodology to assessing site capacities. This generally accords with the methodology used for the Mayor's SHLAA (2013).<br><br>Support noted for cultural quarter. |



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| R01213/R02            | Mayor of London                  | MM6                      | LP1B and 3.4.7 and 3.4.10 - 3.4.11 | The Mayor is of the opinion that the proposed de-designation of two strategic sites located within Green Belt (King George and Goodmayes Hospitals and Land at Billet Road) are not in conformity with the London Plan.  | Noted. As set out in CED013 the Council sets out its position in regards to the borough's Green Belt and 'exceptional circumstances'. To reiterate, the Council maintains the findings of the Green Belt Review 2017 (LBR2.41) with regards to King George and Goodmayes and Billet Road sites. These sites will contribute to meeting the Council's minimum housing target and closing the gap on housing need, as well as the provision of key social infrastructure.   |
| R01213/R03            | Mayor of London                  | MM7                      |                                    | Objection to the de-designation of King George and Goodmayes Hospital Site and Land at Billet Road Site from the Green Belt.<br><br>The Mayor urges Redbridge to produce a detailed masterplan for the site and consider whether the land meets the tests for designation as Metropolitan Open Land.   | Noted. In accordance with NPPF paragraph 83, Green Belt boundaries should only be altered in 'exceptional circumstances', through the preparation or review of the Local Plan not a masterplan. As set out in CED 013 the Council considers that it does have 'exceptional circumstances' and maintains the findings of the Green Belt Review (LBR 2.41) with regards to the King George and Goodmayes Hospital site. It should be noted that the Council has clearly committed to undertaking a comprehensive Masterplan before any redevelopment of the site. |
| R01213/R04            | Mayor of London                  | MM8                      |                                    | Support removal of The Ford Sports Ground policy.  | Support noted.  |
| R01213/R05            | Mayor of London                  | MM9                      |                                    | Object to inclusion of Land at Billet Road and lower housing number.   | Noted. See response R01213/R2.  |
| R01213/R06            | Mayor of London                  | MM11                     | LP1C and 3.5.6                     | Object to lower housing number.  | Noted. See response R01213/R1.  |
| R01213/R07            | Mayor of London                  | MM15                     | LP1E                               | Object to lower housing number.  | Noted. See response R01213/R1.  |
| R01213/R08            | Mayor of London                  | MM16                     | 3.7.4                              | Support the removal of Oakfield as a site for development.   | Support noted.  |
| R01213/R09            | Mayor of London                  | MM17                     | 3.7.5                              | Support the removal of Oakfield as a site for development.   | Support noted.  |
| R01213/R10            | Mayor of London                  | MM19                     | 3.8.4 and 3.8.5                    | Welcomes the review of the borough's Site Allocations, however he is concerned about the decrease in the proposed housing supply figure.<br><br>Although the borough is still meeting its housing supply target set out in the London Plan, the proposed amendment to the housing figure means the gap has increased between its identified housing capacity and need.<br><br>The Mayor recommends Redbridge commit to an early review of the plan to take into account the newly released, increased draft London Plan housing targets. | Noted. See response R01213/R1. Following adoption of the proposed London Plan, expected in 2019, the Council will its Local Plan to take account of the regional spatial strategy.  |
| R01213/R11            | Mayor of London                  | MM23                     | LP3 and 3.9.5                      | Support the change to the affordable housing policy to include a minimum strategic affordable housing target of 35% which is in line with the Mayor's Affordable Housing and Viability SPG. Support the approach to affordable housing and reference to the Mayor's Affordable Housing and Viability SPG. It should be noted that the SPG is dated 2017 and not 2016.  | Support noted. The date will be corrected as part of a minor drafting change.   |
| R01213/R12            | Mayor of London                  | MM24                     | 3.9.6                              | Support the change to the affordable housing policy to include a minimum strategic affordable housing target of 35% which is in line with the Mayor's Affordable Housing and Viability SPG (as per the GLA and Council's Statement of Common Ground).<br><br>Support the approach to affordable housing and reference to the Mayor's Affordable Housing and Viability SPG. It should be noted that the SPG is dated 2017 and not 2016 (as per the GLA and Council's Statement of Common Ground).   | Support noted.  |
| R01213/R13            | Mayor of London                  | MM25                     | LP4                                | Support the new section on Student Accommodation made in response to the GLA and Council's Statement of Common Ground).  | Support noted.  |
| R01213/R14            | Mayor of London                  | MM26                     | 3.10.7                             | Support the new section on Student Accommodation made in response to the GLA and Council's Statement of Common Ground).  | Support noted.  |
| R01213/R15            | Mayor of London                  | MM31                     | LP9                                | Like Chadwell Heath, Green Lane District Centre is partly located within the London Borough of Barking and Dagenham. For consistency, it would be useful to add (part) after Green Lane in bullet point ii).   | Noted. This will be corrected as part of a minor drafting change.   |
| R01213/R16            | Mayor of London                  | MM41                     | LP19 and 4.3.2 - 4.3.3             | Support the proposed amendments and welcome the reference to London Plan policy 5.2.   | Support noted.  |

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| R01213/R17            | Mayor of London                  | MM42                     | 4.3.7                                  | Considers wording could be clearer. Add the word 'turbine' after 'wind' and 'therefore' after 'that could compromise'.  | Noted. The words 'turbine' and 'appropriate' will be added accordingly as part of a minor drafting change.  |
| R01213/R18            | Mayor of London                  | MM44                     | LP21                                   | Delete 'possible' before 'overall' (grammar).   | Noted. This will be corrected as part of a minor drafting change.   |
| R01213/R19            | Mayor of London                  | MM48                     | LP23 and 4.13.3                        | Support the references to the London Plan minimum and maximum parking standards in place of Appendix 7.   | Support noted.  |
| R01213/R20            | Mayor of London                  | MM49                     | 4.14.3                                 | Support the proposed additions to the supporting text on air pollution and air quality and to Policy LP24.  | Support noted.  |
| R01213/R21            | Mayor of London                  | MM50                     | LP24 and 4.51 - 3 and 4.17.5           | Support the proposed additions to the supporting text on air pollution and air quality and to Policy LP24.  | Support noted.  |
| R01213/R22            | Mayor of London                  | MM53                     | LP27                                   | Support amendments to the tall buildings policy and references to London Plan Policy 7.7.   | Support noted.  |
| R01213/R23            | Mayor of London                  | MM54                     | 5.2.3 - 5.2.4, 5.27 - 5.2.9 and 5.2.12 | Support amendments to the tall buildings policy and references to London Plan Policy 7.7.   | Support noted.  |
| R01213/R24            | Mayor of London                  | MM59                     | LP32                                   | Support the reference to the London Plan.   | Support noted.  |
| R01213/R25            | Mayor of London                  | MM61                     | 6.1.7 - 6.1.9                          | Object to the identification of King George and Goodmayes Hospitals and Billet Road as Development Opportunity Sites in Appendix 1.   | Noted. See response R01213/R2.  |
| R01213/R26            | Mayor of London                  | MM72                     | 7.3.4                                  | Support the amendment to include the requirement for masterplans for key strategic sites, particularly for the King George and Goodmayes Hospital Site.   | Support noted.  |
| R01213/R27            | Mayor of London                  | MM74                     | Appendix 1                             | Comment – there was no indication in Appendix 1 of amendments to the sites. A tracked change document would have been useful.   | Noted.  |
| R01218/R1             | Historic England                 | None                     | None                                   | No comment to make, satisfied with the Local Plan as it stands.   | Noted.  |
| R01259/R1             | Clive Durdle                     | MM27                     | 3.11.7                                 | Commends Swenarton 's new book 'Cook's Camden' and the discussion of low rise high density housing, especially how individual and communal play space is enabled; and<br><br>Policy should require detailed design and access statements that argue why specific design choices have been made in relation to parking, play, green space, business and housing. | Comments noted. The density used to determine a sites housing capacity is related to the London Plan Density Matrix. The Council's approach to site housing capacity and densities is set out in document LBR 2.06.<br><br>The Council proposed to use the parking standards set out in the London Plan. Future planning applications will have to demonstrate how they comply with these standards and their wider approach to design.   |
| R01260/R1             | Simon Griffith                   | None                     | None                                   | Lack of cooperation with Mayor or TfL regarding transport issues;<br><br>Inadequate car parking at Tube stations; and<br><br>Tube is already crowded which will be further exacerbated by new development.  | Comments noted. The Council have sought to co-operate with TfL throughout the Local Plan process as set out in LBR 1.14.<br><br>The Council is working with TfL on this issue. However, it should be noted that the proposed existing levels of car parking on these sites will be retained as part of any potential redevelopment.<br><br>The Council is aware of issues relating to Central Line capacity and is engaging with neighbouring authorities and TfL on the issue. As set out in CED010 paragraphs 3.3 and 3.4 the Council is working with TfL to mitigate congestion and increase capacity on the Central Line. |

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| R01261/R1             | Rick Mayston                     | None                     | None                | Plans difficult to access and convoluted;<br><br>Council seeking to bring more people into borough at expense of Green Belt, existing residents pressured to move elsewhere;<br><br>Plans prioritise young and ethnic communities at expense of elderly;<br>Stricter takeaways policy needed; and<br><br>Residents near schools should get free residents parking. | Comments Noted. The Council considers that it has 'exceptional circumstances' to alter its green belt boundaries in line with national policy to meet its development needs as set out in CED006. However, it should be noted that the vast majority of development in the borough will be directed to previously developed land.<br><br>The Local Plan have been prepared to ensure all future and existing residents benefit from the future development of the borough. For example, the Local Plan includes policies which will directly benefit older people including LP4 - Specialist Accommodation and LP18 - Health and Wellbeing.<br><br>The Council considers that it has included a effective policy in relation to the management of hot food takeaways. Policy LP11 has been modified to reflect the Inspector's post hearing advice set out in IED011.<br><br>Issues of free resident parking near schools and gritting roads are not relevant to the proposed Local Plan modifications. |
| R01262/R1             | B Bliss                          | None                     | None                | Plans are convoluted and take too long to read; not everyone is online.<br><br>Asks who is building these properties and why will it help the council. Not clear where new schools are (and they should not be academies).   | Noted. The majority of properties will be built by private house builders. The Council is seeking to increase the number of units it builds in the borough and Housing Associations will also make a key contribution.<br><br>Two new schools are proposed in Ilford Investment and Growth Area and well as three new schools in the Crossrail Corridor. In other parts of the borough, schools are proposed to be extended to accommodate growth in pupil numbers. The Local Plan cannot dictate the nature of these new schools.  |
| R01263/R1             | NHS Redbridge CCG                | MM17                     | 3.7.5               | Disappointed with overall reduction in housing numbers due to role decent housing has in health and wellbeing.   | Noted. However, it should be noted that removal of Oakfield and Ford Sports Ground is on the basis to ensure sufficient playing pitch provision over the plan period.   |
| R01263/R2             | NHS Redbridge CCG                | MM17                     | 3.7.5               | Confident changes will not affect ability to deliver healthcare capacity. Main change affecting healthcare is removal of Oakfield (MM170, however existing Fullwell Cross site is undergoing feasibility study for increased capacity.   | Noted. Welcome progress on feasibility study at Fullwell Cross to increase capacity in the local area.  |
| R01264/R1             | Mark Ling                        | MM74                     | Appendix 1          | Objection to designation of LUL car park sites as housing sites in Local Plan; will impact on nearby business, cause overspill; not always practical to walk to station (distance, disability, personal safety at night etc) and may result in people driving full journey. Housing likely to be overly dense and poor quality due to proximity to railway.        | Noted. TfL are currently working on options for the development of their car park sites, including the retention of public car parking alongside new housing, and design solutions to railway noise etc. Public consultation will be undertaken in relation to any future planning applications on these sites.   |
| R01265/R1             | Jin Goodfellow                   | None                     | None                | Concern that Local Plan will include redevelopment of Sainsbury's site in George Lane, South Woodford, including Odeon Cinema. Asks that Odeon be classed as an ACV.<br><br>Also concern re proposed closure of main Post Office in George Lane.   | Noted. The Sainsbury's and Odeon sites are not included as 'Development Opportunity Sites' in the Local Plan.<br><br>Sites cannot be designated as a ACVs in the Local Plan.<br><br>The Post Office's operation arrangements are separate from the Local Plan. The site has also not been included as a 'Development Opportunity Site'  |
| R01266/R1             | Peter Mann                       | None                     | None                | Current issue for housing is affordability, yet this is little mentioned within the plan. A moral imperative irrespective of regulation. Infrastructure (bus, tube, schools, medical facilities) currently at full capacity; extra vehicles / residents will cause issues.   | Noted. The Council has set out its position with regards to affordable housing can be found in CED15. The Council approach to affordable housing is in accordance with the Mayor's recently adopted guidance.<br><br>The Local Plan is supported with an Infrastructure Delivery Plan 2017 (LBR 2.21) which sets out the borough's infrastructure requirements.   |

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| R01267/R1             | DP9 for Aurora                   | MM74                     | Appendix 1          | The indicative capacity of site 218 should be 92 C3 use class homes based on a higher density assumption. The indicative employment floorspace should be 500 square metres to reflect pending application.   | Noted. As set out in LBR 2.06 the Council sets out the methodology it used to determine site capacity. To clarify, where no up-to-date planning information was known the Council sought to apply housing densities in accordance with the London Plan density matrix. The amount of employment floorspace has been determined by the Employment Land Review 2016 (LBR 2.33) The Council maintains the capacity estimate in relation to site 218.   |
| R01267/R2             | DP9 for Aurora                   | MM18                     | LP2                 | Text misleading as implies that planning applications should not exceed indicative quantum of new units. Main Mod should read: "Opportunity sites should seek to deliver or exceed the indicative quantum of new homes identified for each site in Appendix 1. <b>The indicative quantum is not a cap.</b> "<br><br>MM22 clarifies that the indicative quanta are not meant to limit development. This emphasis should be made explicit throughout the Local Plan, and be clear that planning applications can exceed the indicative capacity subject to satisfying other policies.  | Noted. As set out in LBR 2.06 the Council has undertaken a comprehensive assessment of individual site capacities. The Council consider MM18 to be appropriate as it states that the quantum proposed in appendix 1 are not 'maximums' rather they are 'indicative' which future planning applications should generally seek to deliver. MM2 further clarifies MM18.  |
| R01267/R3             | DP9 for Aurora                   | MM18                     | LP2                 | LP2 should be futureproofed to ensure it incorporates and accommodates increased London Plan housing target. Suggested wording in LP2 of: <b>"this target will be rolled forward until it is replaced by a revised London Plan target"</b> .   | Noted. The Local Plan has been prepared to be in accordance with the adopted London Plan.   |
| R01267/R4             | DP9 for Aurora                   | MM5                      | LP1A                | Number of homes in Ilford reduced from 6,000 to 5,300. Land supply should not mechanically inform target number of new homes. Unclear why this is proposed in context of opportunity area and Housing Zone, especially as indicative quanta do not fully optimise land in accordance with London Plan Policies 2.13 and 3.4. Target should remain at 6,000.  | In response to the Inspectors Update (IED007) the Council prepared an update to document LBR 2.06 and 2.06.1 to set out its position on housing density and site numbers. The resulting work adjusted housing capacities for some sites in the Ilford Investment and Growth Area, particularly where mix of non residential units what factored into overall site capacity. The Council consider that its approach is consistent with London Plan policies 2.13 and 3.4 and set out in appendix 1 in relation to Ilford Opportunity Area. |
| R01267/R5             | DP9 for Aurora                   | MM53                     | LP27                | Support confirmation that tall and large buildings supported in Ilford Metropolitan Centre / IGA. Principle of changes to MM53 welcomed, but text needs to ensure sufficient flexibility. Suggest following amendments:<br>"3. All proposals for tall and large buildings in all parts of the borough will be assessed against the design criteria set out in Local Plan Policy LP26, as well as criteria set out in London Plan Policy 7.7, and should:<br>a) integrate well with the site and surroundings, in terms of how buildings fit in with the street, and how they affect the day and night time skyline;<br>b) relate well to the architectural and historic context of the surrounding area of the building, and not <b>unacceptably</b> impact adversely on heritage assets and their settings;<br>c) not <b>unacceptably</b> impact adversely on the views having regard to the natural topography of the area;<br>d) not <b>unacceptably</b> impact adversely on the buildings, public spaces, open spaces, and watercourses, by reason of overshadowing. | Support noted. However, additional wording change is considered unnecessary for soundness.  |
| R01268/R1             | DP9 for Access Self Storage      | MM18                     | LP2                 | Text in LP2 as modified does not clarify that "indicative quantum" is purely an estimate. Current text could be misinterpreted to suggest that planning applications should not exceed the indicative quantum of new homes. Cites paragraph 58 and 157 of NPPF. Suggests that main modifications amended as follows: "Opportunity sites should seek to deliver or exceed the indicative quantum of new homes identified for each site in Appendix 1. <b>The indicative quantum is not a cap.</b> "<br><br>This clarifies that indicative quantum are not intended to limit development, and that planning applications may exceed the indicative capacity subject to other policies.   | Noted. See response R01267/R2.  |
| R01268/R2             | DP9 for Access Self Storage      | MM18                     | LP2                 | Draft London Plan will increase target, suggests LP2 include phrase: <b>"this target will be rolled forward until it is replaced by a revised London Plan target"</b> .  | Noted. See response R01267/R3.  |

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| R01268/R3             | DP9 for Access Self Storage                | MM5                      | LP1A                | Number of homes in Ilford reduced from 6,000 to 5,300. Land supply should not mechanically inform target number of new homes. Unclear why this is proposed in context of opportunity area and Housing Zone, especially as indicative quanta do not fully optimise land in accordance with London Plan Policies 2.13 and 3.4. Target should remain at 6,000.   | Noted. See response R01267/R4.   |
| R01268/R4             | DP9 for Access Self Storage                | MM23                     | LP3                 | MM23 increases Borough's affordable housing target to 35% in line with Mayor's Affordable Housing SPG. Policy LP3 should include text to make clear that affordable housing provision should be assessed on habitable room basis, as opposed to unit numbers, to ensure it is fully aligned with Mayor's SPG.   | Noted. The Council maintains the current proposed wording to LP3. The Council will provide further guidance on this matter in its emerging Planning Obligations SPD. |
| R01268/R5             | DP9 for Access Self Storage                | MM27                     | LP5 and 3.11.7      | Welcome additional text acknowledging that housing mix needs to be considered on site by site basis. This is welcomed as it provides clarity that the policy needs to be applied flexibly across the Borough in area specific ways.   | Support noted.   |
| R01268/R6             | DP9 for Access Self Storage                | MM52                     | LP26                | LP26 as revised needs to refer to not resulting in an " <b>unacceptable</b> adverse impact" given need to optimise brownfield sites and develop at higher densities.  | Noted. Proposed wording is unnecessary for soundness.  |
| R01268/R7             | DP9 for Access Self Storage                | MM53                     | LP27                | Principle of changes to MM53 welcomed, but text needs to ensure sufficient flexibility. Suggest following amendments: "3. All proposals for tall and large buildings in all parts of the borough will be assessed against the design criteria set out in Local Plan Policy LP26, as well as criteria set out in London Plan Policy 7.7, and should:<br>a) integrate well with the site and surroundings, in terms of how buildings fit in with the street, and how they affect the day and night time skyline;<br>b) relate well to the architectural and historic context of the surrounding area of the building, and not <b>unacceptably</b> impact adversely on heritage assets and their settings;<br>c) not <b>unacceptably</b> impact adversely on the views having regard to the natural topography of the area;<br>d) not <b>unacceptably</b> impact adversely on the buildings, public spaces, open spaces, and watercourses, by reason of overshadowing. | Noted. Proposed wording is unnecessary for soundness.  |
| R01268/R8             | DP9 for Access Self Storage                | MM56                     | LP29                | Communal amenity space requirement does not differentiate between different unit sizes (assumes all units will need the same amount of communal space) and is unrealistic for high density residential development.   | Noted. Proposed wording is unnecessary for soundness.  |
| R01269/R1             | Savills for La Salle Investment Management | MM74                     | Appendix 1          | Supports principles of Local Plan but believes site capacities could be increased.  | Support for principles noted.  |
| R01269/R10            | Savills for La Salle Investment Management | MM74                     | Appendix 1          | Proposed intensification of development at site 36 would help need borough's need for additional residential units. Existing high use value of Ilford Retail Park means that a scheme would need to exceed indicative capacity to realise objective of comprehensive redevelopment. A low density scheme would mean the scheme cannot be realised, losing benefits of redevelopment and increasing pressure on less suitable sites.   | Noted. See response to R01075/R1.  |
| R01269/R11            | Savills for La Salle Investment Management | MM74                     | Appendix 1          | Proposed increase to indicative capacity of approximately 450 units based on early feasibility work. Reduction in employment floorspace provides opportunity to consolidate provision. LSIM does not consider a primary school viable within Ilford Retail Park. There may be an opportunity to provide an educational facility within the boundary of the Opportunity site, but outside the retail park, or alternately at Ley Street Car Park.  | Noted. See response to R01075/R1.  |
| R01269/R2             | Savills for La Salle Investment Management | MM2                      | LP1                 | Strongly supports Policy LP1 and overarching objective to promote growth within the Borough, with particular focus on Ilford Metropolitan Centre.   | Support noted.   |



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| R01269/R3             | Savills for La Salle Investment Management | MM5                      | LP1A                | Strongly supports proposed changes to LP1A and corresponding changes to 3.3.7.  | Support noted.  |
| R01269/R4             | Savills for La Salle Investment Management | MM5                      | LP1A                | Objects to proposed modifications to reduce number of homes (MM5). Does not accord with overall objectives of Local Plan, and is inconsistent with objectives of London Plan and NPPF in regard to maximising the potential of accessible sites.  | Noted. See response RO1213/R1.  |
| R01269/R5             | Savills for La Salle Investment Management | MM22                     | 3.8.13              | Understand that the overall reduction is due to changes to Appendix 1. However LSIM and other parties believe a number of Opportunity Sites offer the potential for greater numbers than is suggested by the indicative capacity. Strongly supports flexibility that MM22 provides as will enable consideration of schemes with greater density if it is compliant with other planning policies.  | Support noted.  |
| R01269/R6             | Savills for La Salle Investment Management | MM5                      | LP1A                | To be consistent with paragraph 3.8.13 as modified, figures in LP1A should be clearly identified as a minimum, and not a cap. Clarifying that the figures are minimums, rather than limits, will help towards the significantly increased housing target of 1,979 dwellings per annum in the draft London Plan. This will ensure the Local Plan is consistent and sound.  | Noted. See response R01267/R2.  |
| R01269/R7             | Savills for La Salle Investment Management | MM23                     | LP3                 | Support proposed MM23 to increase affordable housing from 30 to 35%. Also support proposed flexibility regarding mix of affordable tenure, including starter homes.   | Support noted.  |
| R01269/R8             | Savills for La Salle Investment Management | MM74                     | Appendix 1          | <p>Iford Retail Park is part of Opportunity site 36; this also includes Redbridge Enterprise Centre and other land. LSIM supports comprehensive redevelopment proposed by Local Plan.</p> <p>LSIM does not support reduction in residential capacity from 398 to 370 units.</p> <p>Iford Retail Park suited to higher densities as is more accessible - at PTAL 6a and 4, whereas rest of land in site 36 has PTAL 4 and 2; and is also more suitable for taller buildings given the precedent for tall buildings to the west, and separation from lower level buildings to the east.</p> <p>Iford town centre and Iford Eastside (as in Delivery Prospectus) are preferred locations for creating new residential neighbourhoods to support Iford town centre.</p> | Support noted for comprehensive redevelopment of the site. In response to the Inspectors Update (IED007) the Council prepared an update to document LBR 2.06 and 2.06.1 to set out its position on housing density and site numbers. The Council consider that its approach is consistent with London Plan policies 2.13 and 3.4. The Council maintains its indicative housing capacity figure for site 36. |
| R01269/R9             | Savills for La Salle Investment Management | MM18                     | LP2                 | Local Plan acknowledges need for density / height in Iford; Policy LP2 promotes development in highly accessible locations. Allocated sites insufficient to meet targets for borough considering that they will increase to 1,979 per annum.  | Noted. See response to R01267/R2.   |
| R01270/R1             | Planware                                   | MM33                     | LP11                | No evidence for seeking to restrict A5 uses as no evidence that proximity of A5 uses to schools, youth centres, or parks causes adverse health impacts. This restriction is not a positive approach to planning, and is an over-generic approach.   | Noted. The Council's position and evidence is set out in CED028 and CED054.   |
| R01270/R2             | Planware                                   | None                     | None                | No indication regarding the impact on local economies. Restriction unfair to new businesses, when competing against existing competitor who are not under such strict controls.   | Noted.  |
| R01270/R3             | Planware                                   | None                     | None                | Systematic review did not find strong evidence to justify policies regulating the food environment around schools. Lack of evidence has been confirmed elsewhere. Majority of purchases by students in the school fringe are at non A5 use class shops.   | Noted. See response R01270/R1.  |

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| R01270/R4             | Planware                         | None                     | None                | Lack of evidence to show that purchases at fast food outlets are more, or less, healthy than in other A class premises. Greatest impact is policy of individual schools regarding allowing students to leave school premises during the day. Use of land use planning to restrict A5 would only have an impact at the end of the school day, and during term time. NPPF cannot be interpreted to provide generic restrictions on a particular use class. | Noted.           |
| R01270/R5             | Planware                         | None                     | None                | Lack of evidence to demonstrate whether fast food is located near schools - proximity likely due to be because schools are near town centres. Unsound to introduce widespread land use policy to protect the amenity of such uses, which can be dealt with on a case by case basis. Proposed approach in direct conflict with the NPPF.  | Noted.           |