

CED028 - Issue 7 – Town Centres and Employment

Are the policies relating to town centres and employment (Policies LP9, LP10, LP11 and LP14), and the other policies relating to promoting and managing growth in Section 3 justified, consistent with national policy and will they be effective?

i) Has adequate provision been made to meet the needs of economic and town centre development?

- 1.1 Yes. Supporting economic and town centre development is a key objective of the Local Plan, as set out in Strategic Objective 1: Promoting and Managing Growth.
- 1.2 Policy LP14 seeks to support economic development by protecting the borough's better quality employment land, and securing the provision of a minimum 21,206m² of new fit for purpose employment spaces that aligns with modern working practices as part of mixed use developments. This approach has been informed by the recommendations of the Employment Land Review (LBR2.33), which has assessed existing sites, and future employment land requirements.
- 1.3 Policies LP9 – LP11 seek to enhance town centre vitality and viability by directing the development of new town centre uses to the borough's town centres, and managing the mix of uses within them. Policy LP9 makes provision for a minimum of 23,911m² of new comparison retail floorspace and 8,562m² of new convenience floorspace, based on increased demand arising from population growth, as recommended by the Retail Capacity Assessment Report (LBR2.34)
- 1.4 Policies LP1A-E provide targets for new employment and retail floorspace by Investment and Growth area, whilst Revised Appendix 1 – Development Opportunity Sites (LBR2.06.1) further sets out where such provision is anticipated on individual site. Proposed modification to Policy LP1 will ensure the figures provided in Appendix 1 of the plan will be a key consideration when development proposals on individual sites come forward.

ii) How will the aims of Policy LP9 regarding the provision of new retail floorspace be achieved and will the policy be effective in concentrating such development in Ilford Metropolitan Centre?

- 2.1 It is acknowledged that additional detail to Policy LP9 is necessary to ensure its aims of focussing new retail development to town centres, and concentrating such floorspace in Ilford Metropolitan Centre, can be achieved through the determination of planning applications. It is therefore suggested that the policy is modified as follows:

"2 Retaining a strong hierarchy of town centres *by directing town centre uses to: as follows to ensure that:*

- (a) *The Metropolitan Centre of Ilford, as the key regional centre within the borough, particularly recognises the significance of a strong comparison retail sector and encourages a wider mix of uses including leisure, office and other commercial uses and community and cultural uses;*
- (b) *The District Centres of Barkingside, Gants Hill, South Woodford, Wanstead and Chadwell Heath (part) will be promoted to provide a complementary retail, leisure, office and evening offer and;*
- (c) *The Local Centres of Woodford Broadway / Snakes Lane, Woodford Bridge, Manford Way, Seven Kings, Goodmayes, Ilford Lane and Newbury Park and Key Retail Parades predominantly provide a local level of retailing and community facilities.*

3. *The scale of development proposed in each centre should be appropriate to the role and character of the centre and its catchment. Proposals outside town centres should demonstrate that all in-centre, and then all well connected edge of centre, options have been assessed for their availability, suitability and viability.*"

2.2 Alongside Policy LP9, it is worth noting that Policy LP1A, as modified through the Schedule of Modifications (LBR1.01.2) sets out that most retail growth in the borough is anticipated in Ilford Investment and Growth Area (which includes Ilford Metropolitan Centre). This is based on the scale, character, and function of the Ilford Metropolitan Centre, and the opportunities identified through the Retail Site Opportunities Assessments (LBR 2.35) and Revised Appendix 1 Development Opportunity Sites (LBR2.06.1).

iii) Are the targets of a minimum of 23,911 sq m of new comparison floorspace and 8,562 sq m of convenience floorspace justified and based on adequate evidence?

3.1 The minimum targets of 23,911m² of new comparison floorspace and 8,562m² of convenience floorspace are based on the findings of the Retail Capacity Assessment (LBR2.34), and therefore justified.

3.2 Targets derive from increased spending capacity in the borough arising from population growth, and Experian expenditure growth forecasts. They take account of the turnover of existing facilities in the study area, and anticipated turnover of extant planning permissions. They assume the borough will maintain its existing market share for convenience goods on the basis of strong current performance, and comparison goods on the basis of evidence of the sector remaining resilient post Stratford City.

3.3 Figures 5.1 and 5.2 of document LBR2.34 set out convenience and comparison goods requirements over the plan period, expressed as a range due to different format stores and operators experiencing differing sales densities. As the lower end of these ranges has been used, they

have been expressed as minimums within policy. Furthermore, the Retail Site Opportunities Assessments (LBR2.35) set out that these minimums are achievable, and have been used to inform site details set out in Revised Appendix 1 Development Opportunity Sites (LBR2.06.1)

- iv) **In Policy LP10 on managing town centres and retail uses what is the rationale for the thresholds of 70% of retail units in primary areas and 50% in secondary areas? Are any of the town centre boundaries or other designations proposed to be changed compared to the existing development plan? Should the status of the Loxford Garage site be reviewed (R1258/04)? What is the rationale for modification 59 (LBR 1.01.2) and how does it respond to R01101/02 which seeks a different policy approach for the Exchange Centre in Ilford?**

Retail thresholds

- 4.1 Policy LP10 seeks to strike a balance in the borough's town centres between protecting the core retail frontage of primary retail frontages, and offering flexibility for a diverse mix of town centre uses in secondary retail frontages. Thresholds used represent an aspiration to strengthen the retail role of town centres, reflecting needs identified through the Retail Capacity Assessment (LBR2.34), and reflect analysis of existing uses within them. This demonstrates that with the exception of some struggling town centres such as Gants Hill and Seven Kings, the majority of primary frontages contain 60-77% retail uses. Secondary frontages represent a greater range, though those with a stronger retail emphasis generally include 40-52% retail uses. Total percentages of retail units within primary and secondary frontages in each town centre are presented below:

Metropolitan

Centre	Primary	Secondary
Ilford	67.17%	35.21%

District

Centre	Primary	Secondary
Barkingside	70.46%	52.35%
Chadwell Heath	59.92%	50%
Gants Hill	54.58%	26.04%
South Woodford	66.85%	36.84%
Wanstead	70.32%	40.43%
Green Lane	N/A	44.29%

Local

Centre	Primary	Secondary
Goodmayes	72.68%	33.62%
Green Lane	75%	42.59%
Ilford Lane	77.28%	22.5%
Manford Way	76.47%	N/A
Seven Kings	51.48%	24.64%
Woodford Bridge	73.48%	45.80%
Woodford Broadway	74.85%	41.11%
Woodford Green	59.38%	12.5%

Town centre boundaries

- 4.2 The Council is proposing to remove the Local Centre designation covering Newbury Park from the existing Development Plan. This is on account of land to the north of the A12 functioning as an out of town retail park rather than providing local level retailing and community facilities. Furthermore, land to the south of the A12 represents the character and role of key retail parades, and is therefore designated as such on the Policies Map. It is acknowledged that there are some inconsistencies within the Local Plan as to how this is addressed. To clarify matters, the following modifications are proposed, which also address other inconsistencies regarding the Local Centres designation:
- 4.3 Amend policy LP9(c) to read:
- "(c) The Local Centres of Woodford Broadway/ Snakes Lane, Woodford Bridge, Woodford Green, Manford Way, Seven Kings, Goodmayes, Ilford Lane and Green Lane ~~Newbury Park~~ and Key Retail Parades predominantly provide a local level of retailing and community facilities."*
- 4.4 Amend 4th sentence of paragraph 3.16.4 to read:
- "In addition, Woodford Broadway/ Snakes Lane, Woodford Bridge, Woodford Green, Manford Way, Seven Kings, Goodmayes, Ilford Lane and Green Lane ~~Newbury Park~~ are designated as Local Centres."*
- 4.5 Amend first sentence of definition of Local Centres in Appendix 9 to read:
- "~~Local/Neighbourhood~~ Centre - Woodford Broadway/ Snakes Lane, Woodford Bridge, Woodford Green, Manford Way, Seven Kings, Goodmayes, Ilford Lane and Green Lane ~~Newbury Park~~ - typically serve a localised catchment often most accessible by walking and cycling and include local parades and small clusters of shops, mostly for convenience goods and other services."*

- 4.6 Amend first sentence of final paragraph of town centres definition in Appendix 9 to read:

"~~Local/Neighbourhood~~ Centre - Woodford Broadway/ Snakes Lane, Woodford Bridge, Woodford Green, Manford Way, Seven Kings, Goodmayes, Ilford Lane and Green Lane ~~Newbury Park~~ - typically serve a localised catchment often most accessible by walking and cycling and include local parades and small clusters of shops, mostly for convenience goods and other services."

- 4.7 The following addition should also therefore be made to the Schedule of Policies Map Modifications (LBR1.02):

"Retail - Remove "Retail Park" designation from Policies Map - in response to Inspector question 7iv."

- 4.8 It should also be noted that the Policies Map inaccurately refers to primary and secondary "areas" rather than "frontages". This is inconsistent with the approach set out in Policy LP10, and encouraged through NPPF paragraph 23, i.e. that Local Plans provide "a clear definition of primary and secondary frontages in designated centres". The Policies Map should therefore be updating as appended to this statement, and the following additional entry made to the Schedule of Policies Map Modifications (LBR1.02):

"Retail - replace primary and secondary areas with primary and secondary frontages - in response to Inspector question 7iv."

- 4.9 Finally, it is noted that Appendix 5 uses inaccurate terminology (such as primary and secondary frontages for key retail parades). It is therefore suggested that this is redrafted in a simpler format as appended to this statement, which in practice will be read alongside the Policies Map.

Modification 59

- 4.10 The rationale behind modification 59 is to offer some flexibility to the retail thresholds set out in parts (b) and (c) of Policy LP10, where alternative town centre uses are proposed that can demonstrate wider regeneration benefits such as increasing footfall and visitor spend. Examples could include proposals for major leisure attractions such as a new cinema or bowling alley within the primary retail frontage of the Exchange. To clarify this, it is suggested that wording could be modified further to state:

"(d) ~~Additionally, in making decisions, the Council will consider the following factors~~ Where proposals for alternative town centre uses do not meet criteria (b) and (c) above, the Council will take into consideration the following factors;

i) the extent to which the proposed use is capable of attracting a significant number of shoppers/visitors to the centre;

ii) the extent to which the proposed use contributes to the Council's aspirations and priorities, in particular, the regeneration objectives for the local area; and

iii) the contribution the proposed use will make to the vitality and viability of the proposed frontage and the centre generally, and will contribute to shoppers' experience."

- 4.11 It is also suggested that additional explanatory text could also be added to the end of para 3.17.3 to read:

"It also recognises that there may be instances where development proposals that do not meet normal retail frontage thresholds can provide wider regeneration benefits without undermining the primary retail function of the centre; in terms of matters such as increased jobs, footfall, and visitor spend. In such circumstances, the onus will be on developers to demonstrate overriding regeneration benefits."

- v) **In Policy LP11 what is the evidence justifying the restrictions in criteria (a) – (c) for hot food takeaways, criterion (c) for betting/gambling shops and money lenders and criterion (b) for shisha bars? Is it reasonable to expect all proposals for betting/gambling shops and money lenders and shisha bars to be located in town centres and to demonstrate how they will promote the health and well-being of borough residents? Why should shisha bars be expected to demonstrate through a planning policy that they will comply with other legislation (criterion (d))?**

Issues relating to Hot Food Takeaways

Background

- 5.1 LP11 is a new policy approach to respond to emerging issues in the borough. Tackling obesity is a high priority in Redbridge. The Council's Obesity Strategy (2016 – 2019) takes a holistic approach to addressing the issue. The implementation of the strategy is overseen by a multi-disciplinary steering group, with members from many organisations across the borough, including planning.
- 5.2 To give a sense of the wider approach to this issue a range of programmes aimed at healthy eating are being implemented in the borough, including:
- An infant feeding service that supports parents with the skills needed to initiate breast feeding and/or Introduction to starting solids.
 - Healthy eating programmes in the community;

- A newly commissioned healthy school meals contract that ensures food is nutritious and of the appropriate quantity and comply with the school food standards;
- A pilot of the Healthier Catering Commitment, which encourages businesses to make small changes to the way in which they prepare and serve food to make it healthier; and
- Work to improve the vending offer in our main leisure centre which we hope to expand more widely.

5.3 The built environment can also play an important role. Managing the proliferation of hot food takeaways is one of a number of actions included in the obesity strategy; recognising the importance of the environment on food choices, and the necessity of having a multi-faceted approach to address the issue.

5.4 **Justification for LP11 criteria (a)** - the Council proposes a modification to LP11 criteria (a) as follows:

Requiring that no more than 57% of units within Primary and Secondary frontages in the boroughs Metropolitan, District and Local Centres to consist of A5 uses;

5.5 Table 1 below sets out the percentage of units in each of the borough's, Metropolitan, District and Local which are hot food takeaways.

Table 1: % of HFTs (A5) in the borough's town centres

Town Centre	% of units which were HTF in 2013/14	% of units which are HFT 2016
Ilford	2.3%	1.8%
Barkingside	7.7%	10.4%
Chadwell Heath	11.2%	9.1%
South Woodford	3.7%	4.7%
Wanstead	3.6%	4.5%
Gants Hill	6.9%	8.3%
Goodmayes	6%	5.3%
Ilford Lane	3.7%	5.1%
Manford Way	3%	2.9%
Seven Kings	10%	10.6%
Woodford Bridge	12.8%	14%
Woodford Broadway	5.3%	5.8%
Average	5.6%	6.9%

- 5.6 As the town centre survey evidence demonstrates the number of HFT in the borough's town centres has generally increased across the borough from previous survey years. The average percentage of units of hot food takaways in each of the borough's town centres is 6.9%. The Council therefore considers setting the threshold of 7% to be justified given the existing mix of uses which are currently within the borough's town centres. The Council consider this threshold to be appropriate given that it allows for potential additional provision in some town centres, with restricting provision in other town centres which currently experience proliferation of HFT uses, undermining their vitality and viability. It is considered the proposed threshold strikes a balance between allowing an increase in some centres, whilst ensuring they do not overly dominate in future.
- 5.7 **Justification for LP11 criteria (b)** - the Council proposes a modification to LP11 criteria (b) as follows:
- Requiring that no more than one A5 unit is located within 50m radius of an existing A5 unit. Requiring each new unit to be separated from any existing A5 unit or group of units by at least two non A5 units.*
- 5.8 The Council considers that the proposed modifications would provide for a more effective and practical approach to the management of clustering of HTF within the borough's town centres.
- 5.9 **Justification for LP11 criteria (c)**
- 5.10 In Redbridge, one in ten (9.7%) 4-5 year olds and one in five (23.5%) 10-11 year olds are classified as obese (NCMP 2015/16). This problem is not unique to children, with over three in five adults living in the borough overweight or obese. Contributing towards this picture is the fact that our residents consume less fruit and vegetables than the average Londoner (an indicator of healthy eating) and have historically had low levels of physical activity, although this has improved in the last year.
- 5.11 It is estimated that 66.7% of adults (aged 16 years and over) in Redbridge are either overweight or obese (Active people survey, 2013-15). Redbridge's overweight and obesity levels are higher than both the London and England averages.
- 5.12 The prevalence of obesity in reception school children (9.8%) has slightly fallen compared to last year (10.8%) but it is still higher than the England average (9.3%). However, the prevalence of obesity in year 6 school children in Redbridge has increased since last year, from 23.2% to 23.5%, and is above England (19.8%).

- 5.13 The causes of obesity and poor diet are multi-faceted, with the environment having a large part to play. There are a variety of interventions that can be used to address obesity, including increasing access to, and improving choice within, the local food retail environment. This of concern giving the borough's obesity rate and the evidence linking fast food take-aways to unhealthy eating, obesity and subsequently poor health.
- 5.14 Redbridge recently participated in the Great Weight Debate that took place across London. Over 350 residents were involved, with Redbridge having one of the highest response rates in the region. There was an online survey and an opportunity to take part in a conversation. Focus groups were conducted and residents were interviewed on their views around childhood obesity. The common themes that emerged were that residents want to lead healthy lifestyle but they feel that their environment and the food that is available are working against them. Fast food is cheap and easily accessible. Children/young people also said that they consumed fast food because it was close to their schools or accessible on their journeys home from school.
- 5.15 Studies (see references in Annex 2) have found that food consumption was associated with the availability/location of fast food outlets, and there was some evidence that greater exposure to fast food was associated with lower fruit and vegetable intake. Further research has found that residing in neighbourhoods with poorer access to fast-food restaurants and convenience stores was associated with a lower likelihood of eating and snacking out. A number of studies have looked specifically at the effect of fast food outlets on children, and near schools. These studies have found that the food retail environment surrounding schools is strongly related to students' eating behaviours during the school day and that children attending schools in neighbourhoods with a higher numbers of unhealthy relative to healthy food establishments scored most poorly on dietary outcomes.
- 5.16 The proliferation of fast food takeaways, particularly near to schools, is a concern in many areas including Redbridge. Although not the only factor contributing to poor diet and obesity, the availability of high density, high fat, and high sugar food is a significant contributing factor that needs to be addressed. The presence of hot food takeaways in close proximity to primary schools contributes to an obesogenic environment which encourages younger children to eat takeaway food. In Redbridge, the National Obesity Observatory (2014) has estimated that there were between 84 to 106 fast food outlets in Redbridge per 100, 000 population.

Annex 1 set out the number of HFT within 400m of existing schools within Redbridge.

- 5.17 Given the above and the existing high number of hot food takaways in the borough, the Council consider that it is justified in resisting new hot food takaways near schools. The 400m is commonly accepted as a reasonable walking distance to access a particular service (the equivalent of a ten minute walk). Therefore, given the above the Council consider this distance to be justified.

Issues relating to Betting Shops, Payday Lenders

Background

- 5.18 London Plan policy 4.8 - Supporting a successful and diverse retail sector and related facilities and services, advises boroughs to manage clusters of uses, specifically having regard to their impact on health and well-being. It notes that, "over-concentrations of betting shops and hot food takeaways can give rise to particular concerns".
- 5.19 In addition, paragraph 4.50A of the London Plan states that it is important that the planning system is used to help manage clusters of uses to provide diverse and more vital and viable town centres and specifically states that over-concentrations of betting shops and hot food takeaways can give rise to concerns.
- 5.20 In the Mayor of London Town Centres Supplementary Planning Guidance, Implementation part 1.2 of the Mayor's supplementary planning guidance for town centres states that boroughs are encouraged to manage over-concentrations of activities, for example betting shops, hot food takeaways and pay day loan outlets.
- 5.21 The London Assembly report 'Open for Business: Empty shops on London's high streets' (March 2013), found units, such as betting shops and pawnbrokers, reduce diversity and impact on the attractiveness of a centre, and therefore footfall.

5.22 In addition, the prevalence of these uses can have negative impacts on the wellbeing of communities. As summarised in the report Health on the High Street by the Royal Society for Public Health, 'There is strong evidence that increasing opportunities – availability and accessibility – to gambling does increase the number of regular and problem gamblers in an area'. In addition other research shows (see annex 2 for references) that:

- Access to gambling venues increases gambling activity and problem gambling is linked to poor health, low level and severe mental ill health and co-dependence on alcohol.
- Multiple forms of betting, particularly Fixed Odd Betting Terminals by younger adults, can be associated with significant harm to health and wellbeing; and that
- Problem gamblers experience the worst health outcomes and tend to live in deprived communities

5.23 There is therefore also a strong social and economic case to prevent an overconcentration of these uses.

5.24 Table 2 below sets out the percentage of units in each of the borough's, Metropolitan, District and Local are betting shops, payday lenders and Shisha Bars (Sui Generis):

Table 2: % of betting shops, payday lenders and Shisha Bars (Sui Generis) in the borough's town centres

Town Centre	% of units which were betting shops, payday lenders and shisha bars in 2013/14	% of units which were betting shops, payday lenders and shisha bars in 2016
Iford	2.7%	3.6%
Barkingside	2.4%	2.5%
Chadwell Heath	1.5%	3%
South Woodford	1.4%	1.8%
Wanstead	1.5%	1.8%
Gants Hill	0.6%	0.6%
Goodmayes	1.3%	1.5%
Iford Lane	0.7%	0.7%
Manford Way	3%	2.9%
Seven Kings	1.5%	3.5%
Woodford Bridge	0%	2.3%
Woodford Broadway	2.1%	1.2%
Average	1.5%	2%

- 5.25 As the town centre survey evidence demonstrates the number of betting shops and payday lenders in the borough's town centres has generally increased across the borough. The Council's planning policies seek to maintain a network of successful town centres and shopping frontages which have a range of shops, services and facilities to help meet the needs of the borough. The over concentration of betting shops and payday lenders in our town centres is of concern as it reduces the diversity of town centres, which impact on vitality and viability.
- 5.26 The average percentage of units of betting shops and payday lenders in each of the borough's town centres is 2%. The Council therefore considers setting the threshold of 2% to be justified given the existing mix of uses which are currently within the borough's town centres. The Council consider this threshold to be appropriate given that it allows for potential additional provision in some town centres, with restricting provision in other town centres which currently experience proliferation of betting shops and payday lenders uses, undermining their vitality and viability. It is considered the proposed thresholds strike a balance between allowing an increase in these uses in some centres, whilst ensuring they do not overly dominate in future.

5.27 The Council propose a modification to LP11 criteria betting shops and money lenders and Shisha Bars as follows:

~~2. The Council will resist the proliferation and overconcentration of betting/gambling shops, and money lenders (A2) and Shisha Bars in the borough by:~~

~~(a) Requiring them to be located within the borough's town centres and in accordance with LP10; Requiring that no more than 2% of units within Primary and Secondary frontages in the boroughs Metropolitan, District and Local Centres to consist of betting shops, payday lenders and shisha bars (Sui Generis) uses;~~

~~(b) Seeking them to demonstrate how they will promote the health and wellbeing of borough residents; Requiring each new sui generis unit to be separated from any existing sui generis unit or group of units by at least two non sui generis units;~~

~~(c) Requiring that no more than one Betting/Gambling Shop or Payday Lender is located within a 50m radius of an existing Betting shop or payday lender unit; and~~

~~(d) (c) Requiring they provide active frontages and have a positive visual impact on the street scene, including meeting policy LP28 - Advertising and Shopfronts;~~

~~The Council will resist the development of Shisha Bars (Sui Generis) in the borough by:~~

~~(a) Requiring them to be located within the borough's town centres and in accordance with LP10 and criteria (b) below;~~

~~(b) Resisting proposals for Shisha Bars that fall within 400m of the boundary of an existing school, youth centre or park;~~

~~(c) Seeking them to demonstrate how they will promote the health and wellbeing of borough residents;~~

~~(d) Demonstrating how they meet/comply with environmental health and smoking legislation;~~

~~(e) d) Resisting proposals that have a significant impact on residential amenity in terms of noise, vibrations, odours, traffic disturbance, litter or hours of operation; and~~

~~(f) e) Resisting proposals that operate with inappropriate hours of operation.~~

- 5.28 To clarify, the proposed modification removes the requirements for all proposals for betting/gambling shops and money lenders and shisha bars to be located in town centres and to demonstrate how they will promote the health and well-being of borough residents.

Issues relating to Shisha Bars

- 5.29 The proposed modification above should be noted as it includes Shisha Bars within in. The modification would 'group' Shisha Bars together with other Sui Generis uses (Betting Shops and Payday lenders). It should be noted that it removes the requirement to expect applications for Shisha Bars to demonstrate through a planning policy that they will comply with other legislation. In addition, the Council propose to insert the following text after 3.18.4:

The number of shisha bars in the borough has increased significantly in the last few years. Many of these operate unlawfully. Given the nature of the use, Shisha bars can adversely impact the amenity of an area, particularly through late night noise and disturbance. In response, the Council has developed a Council wide approach with the Council's Planning Enforcement, Environmental Health, Licencing Enforcement sections and the Fire Brigade, all working alongside each other to manage the growth in this use. This corporate approach seeks to ensure that such uses gain the correct planning consents and also ensure that they meet all other legislation requirements. In addition, there is also a focus on educating and ensuring the individuals who run the establishments fully understand the implications and obligations they have to their staff and customers.

vi) Are the proposed allocations of the Hainault Business Park and the Southend Road Business Park in criterion (b) of Policy LP14 justified?

- 6.1 The proposed allocations of Hainault Business Park as an Industrial Business Park and Southend Road Business Park as part Preferred Industrial Location, part Industrial Business Park, are justified.
- 6.2 NPPF paragraph 22 states that "planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose" and that "land allocations should be regularly reviewed".
- 6.3 Both sites are currently allocated as Strategic Industrial Locations (sub-category Preferred Industrial Locations) in the London Plan. They have been reviewed through the Employment Land Review (LBR2.33), which noted at section 6.8 that they are "relatively successful in terms of

quality” and “have particularly low vacancy rates”. It therefore concluded at section 6.6 that they be “protected and intensified.”

6.4 Site Assessments carried out through the Employment Land Review (LBR2.33) identified that whilst these sites offer large clusters of warehousing, industrial and office use, there was evidence of changing character and inward investment; through matters such as refurbishment of building stock, investment in security, lighting, and electrical vehicle charging. As Industrial Business Parks are defined in the London Plan as areas “suitable for activities that need better quality surroundings”, recommendation 3 of document LBR2.33 was that they be re-categorised as set out in the Local Plan. As set out in the Statement of Common Ground between the Council and the GLA (CED019), the Council’s approach to employment land including its protection of Strategic Industrial Locations, and clearly defining where land is re-categorised from Preferred Industrial Locations to Industrial Business Parks, is supported by the GLA.

vii) The Employment Land Review (LBR 2.33) refers to the managed loss of up to a total of 14.45 hectares of employment land. Is criterion (d) of Policy LP14 adequate for this to be achieved and where will this occur?

7.1 The Employment Land Review (LBR2.33) assessed approximately 60ha of employment land in the borough, including both designated and non-designated land. It subsequently made recommendations of where land merited continued protection, and where a more flexible approach to land use uses could be adopted.

7.2 Consistent with the findings of LBR2.33, and in particular its site recommendations set out table 14, the Local Plan protects the borough’s best quality employment land as Strategic Industrial Locations and Local Business Areas. This approach has been supported by the GLA as set out the Council’s Statement of Common Ground with the GLA (CED019).

7.3 To secure the managed release of up to 14.45ha poorer performing employment land, all remaining, non-designated sites have been identified in Appendix 1 as Development Opportunity Sites (LBR2.06.1). The redevelopment of these sites, which in most cases is envisaged to include the provision of some replacement modern employment space that better aligns with modern working practices, will therefore manage the loss of non-designated employment land in a co-ordinated way.

7.4 It is acknowledged that as currently worded LP14 (d) places unintentional policy constraints on Development Opportunity Sites that should only apply to any non-designated employment sites that were not assessed as part of the Employment Land Review (LBR2.33). It is therefore suggested that the policy is further reworded as follows:

"(d) Making more effective and efficient use of non-designated employment land by managing the release of 14.45 ha of employment land considered to be outdated, underutilised or poorly performing. Unless identified as a Development Opportunity Site in Appendix 1, proposals for alternative uses on non-designated employment land should ~~On such sites proposals should:~~

i Demonstrate that continued business activity will conflict with character, appearance and amenity of the locality and its surrounding area;

ii Demonstrate the premises have been vacant for over 12 months, following active marketing using reasonable terms and conditions, and has no reasonable prospect of being occupied for another business use; and

iii Include compatible modern fit for purpose employment uses as part of any new or replacement mixed use schemes."

viii) How is the aim for a minimum of over 21,000 sq m of new business accommodation to be achieved in line with Policy LP14(e) without additional allocations of land? Is sufficient monitoring in place to ensure that this is realised over the plan period and within the different Investment and Growth Areas?

8.1 Based on the recommendations of the Employment Land Review (LBR2.33), Policy LP14 provides for the release of 14.45ha of land previously used for employment purposes. The aim of a minimum 21,206m² of new business accommodation to meet modern business needs can be achieved through the mixed use redevelopment of these sites, meaning additional allocations of land are not required. Revised Appendix 1 – Development Opportunity Sites (LBR2.06.1) sets out where the provision of new business accommodation is envisaged. In addition, there may also be scope for further intensification of protected Strategic Industrial Locations and Local Business Areas; through extensions to existing buildings or their replacement with larger buildings for employment purposes.

8.2 Regarding monitoring, it is acknowledged that some amendments to indicators set out in Appendix 3 will be necessary to effectively monitor changes within the different Investment and Growth Areas over the plan period. The following amendments to indicators are therefore suggested:

"1b – amount of floorspace developed for employment by type, by Investment and Growth Area in employment or regeneration areas

1f – amount of employment land lost to residential development"

ix) Does Policy LP14 adequately address live/work units?

9.1 It is acknowledged that Policy LP14 could benefit from some additional guidance on live/ work units, both in terms of clarifying that they may be an acceptable use on non-designated employment land, and setting out what criteria would apply to such proposals.

9.2 It is therefore suggested that Policy LP14 (d) part (iii) is further modified from that originally proposed in modification 68 of LBR1.01.2 to read as follows:

"Include compatible modern fit for purpose employment uses, which could include live/ work units, as part of any new or replacement mixed use schemes."

Furthermore, it is also suggested that a new policy point (g) is added to read as follows:

"Where live/ work units are proposed:

- At least 50% of the proposed floorspace of an individual unit should be B1 workspace, to ensure it is genuinely dual use, and the workspace is compatible with the residential element;*
- the residential element should meet amenity and internal space standards;*
- the character and function of the surrounding area should not be compromised, and*
- where development thresholds are met, affordable housing requirements will apply."*

Other policies relating to promoting and managing growth

i) In Policy LP4 what is the definition of Specialist Accommodation? Is it the same as Specialist Housing in the Glossary of Terms in Appendix 9?

1.1 Yes, the definition of what is considered to be 'Specialist Housing' is set out in Glossary of Terms Appendix 9 is the same definition as 'Specialist Accommodation' as termed in policy LP4.

1.2 The following modification is proposed in response to the above question:

Appendix 9 – Page 191 – Specialist Housing Accommodation

ii) Is Policy LP4 unsound due to the absence of reference to student accommodation? Would this be rectified by modification 50 (LBR 1.01.2)?

2.1 With regards to the issue raised in question 1 above, the Council notes the inconsistency in relation to the uses covered in LP4 and those stated in

glossary of terms in Appendix 1, particularly in relation to student housing.

- 2.2 It is the Council's view that modification 50 on its own does not rectify this issue. The following modifications, in addition to modification 50, are proposed to rectify any potential issues of soundness. These modifications will clearly ensure 'student accommodation' is embedded into the policy.

- 2.3 Modify heading 3.10 to state:

Specialist accommodation for older, vulnerable, and homeless residents and students

- 2.4 Modify LP4 1 second sentence to state:

The Council will support various forms of Specialist Housing Accommodation where it:

- 2.5 Create a new sub-heading 'Student Accommodation' and add the following justification text after paragraph 3.10.7 to state:

Whilst there are no universities located within Redbridge and there is unlikely to be any significant increase in demand for student housing over the plan period, the Council support the provision of student housing in the borough. The London Plan (2016), policy 3.8, seeks to encourage a more dispersed distribution of future student provision taking into account development and regeneration potential in accessible locations. The Council will therefore support student housing in highly accessible locations, particularly areas with excellent transport connections to central London, such as Ilford and Crossrail.

As also noted by the London Plan, paragraph 3.53, addressing demand for student housing should not compromise conventional housing supply, particularly affordable housing or undermine mixed and balanced communities. The Council will therefore resist student housing which would result in the loss of residential (C3) accommodation. New purpose built student housing may reduce pressure on conventional housing which is currently occupied by students.

The Council will seek to secure student housing at rent level which are affordable levels to the wider student body.

- 2.6 The Statement of Common Ground between the Council and the GLA (CED019) sets out the GLA's support for the inclusion of the above modifications, in addition to modification 50, to overcome their objection.

iii) Is the preferred housing mix set out in Table 4 justified? Does it give sufficient emphasis to providing for family housing? Will Policy LP5 be effective having regard to modifications 52 and 53 (LBR 1.01.2)? Should the policy be more prescriptive in requiring the achievement of the preferred housing mix on greenfield opportunity sites? Why is modification 54 required to achieve soundness? How will site by site assessments be made and with regard to what factors?

- 3.1 LP5 is a new policy approach to respond to emerging issues in the borough. As set out in paragraph 50 of the NPPF and policy 3.9 of the London Plan the Council seeks to develop mixed and balanced communities. As stated in paragraphs 3.12.6 of the Local Plan, the borough's housing stock of larger homes is currently being eroded through dwelling conversions and HMOs. Whilst LP6 seeks to manage this, however the provision of larger homes in new development will contribute to 'rebalancing' the borough's housing stock and increasing the number of larger units in the borough, providing residents with choice and a range of unit sizes. The Council consider that the approach taken in LP5 would encourage a 'step change' in the provision of family housing, setting out a preferred mix which all new future housing developments in the borough should seek to achieve. The Council considers that the application of this policy will result in an uplift in the number of larger units generated from new housing development than is currently achieved through its currently adopted policies.
- 3.2 The preferred matrix has been prepared with reference to the Outer North East London SHMA (2016) (LBR 2.01) and Update (2017) (CED003). These documents show a clear need for larger homes in the borough. Of the total objectively assessed housing need for market housing over the plan period, (21,800 homes), approximately 85% (18,600 homes) are for homes of over 3 bedrooms or more. In addition, of the total objectively assessed housing need for affordable housing over the plan period (12,500 homes) approximately 64% (8,000 homes) are for homes of 3 bedrooms or more.
- 3.3 In addition to the above documents, the preferred housing mix has been set in the context of the NPPF, paragraph 173, which states, "pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened". NPPF paragraph 174 also states, "local planning authorities should set out their policy on local standards in the Local Plan, including requirements for affordable housing. They should assess the likely cumulative impacts on development in their area of all existing and proposed local standards, supplementary planning documents and policies that support the development plan, when added to nationally required standards. In order to be appropriate, the cumulative impact of these standards and policies should not put implementation of the plan at serious risk, and should facilitate development throughout the economic

cycle. In relation to this the Local Plan Viability Assessment and Community Infrastructure Review (CED111), paragraphs 6.13 – 6.19, assessed the impact of the Council’s preferred dwelling mix on development viability. The study found, that in general, all sites assessed as part of the study could accommodate the Council’s preferred mix in full and still be viable at the proposed 35% affordable housing target.

- 3.4 It is therefore the Council’s view that the approach taken in LP5 is justified and sufficiently emphasises the need for new development to provide larger units in the borough whilst also contributing to the delivery of mixed and balanced communities in the borough by delivering a range of both small and large unit sizes. The approach in LP5 is balanced with the need to ensure these aims are achieved whilst not undermining the viability and therefore deliverability of new housing development coming forward in the borough.
- 3.5 The Council does not consider that the policy should be more prescriptive in specifying that green belt sites should achieve the Council’s preferred mix. This policy is designed to be applied to all housing development in the borough.
- 3.6 As noted in the above paragraph, the Council considers that modification 154 is required for soundness as it will make the policy effective by providing sufficient flexibility in its application. The preferred mix will be applied to all housing sites across the borough. Consideration of the preferred mix on a site by site basis will enable particular development/site factors to be considered when applying the preferred housing mix.
- 3.7 The Council propose to withdraw modifications 52 and 53 and modify policy LP5 as follows:

The Council will aim to secure a range of homes that will contribute to the creation of mixed, inclusive and sustainable communities by:

~~*The Council will Seeking all housing developments to provide a range of dwelling sizes and tenures particularly focusing on the provision of larger family sized homes (three bed plus) in line with the preferred housing mix, as set out in Table 4. The dwelling mix will be considered on a site by site basis and in applying the preferred housing mix regard will be given to the following:*~~

- ~~*a) site size and other constraints;*~~
- ~~*b) the surrounding context and character;*~~
- ~~*c) the overall level of affordable housing proposed; and*~~
- ~~*d) the financial viability of the scheme.*~~

~~*The Council will seek the dwelling mix in new development in established suburban residential locations to consider and reflect the existing context and character.*~~

~~The Council recognises that town centres can be more challenging to provide a higher proportion of family housing and will therefore take a flexible approach when applying the preferred housing mix in such locations.~~

- 3.8 Modify paragraph 3.11.7 which sets out the factors which will be considered in assessing a sites dwelling mix:

~~In considering dwelling mix, the Council will assess the character of the proposed development, its site size and other constraints, the surrounding context and character, the overall level of affordable housing proposed and the financial viability of the scheme. Whilst the Council recognises that smaller homes are more conducive to higher density town centre living, and larger family homes are more conducive to more suburban environments, development proposals will be expected to include all units sizes.~~

The Council recognise that not all housing development in the borough will be able to meet the preferred housing mix. Therefore, flexibility around the preferred dwelling mix may be required, for example, to achieve a rational layout, the best possible accessibility arrangements or the need to satisfy design and amenity concerns. When considering the proportion of larger homes, the Council will take into account any features that make the development particularly suitable for families with children. For example, child-friendly features of housing development could include; the potential to provide space on site where children can play, either through private or communal space; dedicated children's play space within the development or available nearby; access to existing open space; and the number of homes with direct access to private amenity space. It should be noted that the Council does not consider that the absence of any or all of these features justifies the omission of large homes from a development, and all the criteria in Policy LP5 should be fully considered.

- iv) **In Policy LP6 what is the justification for specifying floor areas of 130 sq m and 150 sq m? How is an over concentration of conversions in one street in criterion 1(b) to be assessed? Should the policy be worded more positively and are sections 1 and 2 superfluous as a result? What is the justification for criteria 3(a) and 4(c)?**

- 4.1 LP6 is a new policy approach to respond to emerging issues in the borough. The Council consider that the policy should be reworded more positively and therefore propose the following modifications to policy LP6 and additional justification text to address the questions raised above:

~~1. The Council will resist the conversion of a larger home(s) to smaller self-contained home(s) (C3) and hotels (C1) where:~~

- ~~(a) It has a gross original internal floor space of less than 130 sq.m;~~
~~(b) It results in the over concentration of conversions in one street; or~~

~~(c) Appropriate car and cycle parking provision is not provided in accordance with the Council's Parking Standards (Appendix 7).~~

~~2. The Council will resist the conversion of a larger home(s) to Buildings in Multiple Residential Occupation (Sui Generis) where:~~

~~(a) It has a gross original internal floor space of less than 150 sq.m; and
(b) It meets the requirements of 1 (b) and (c) above.~~

~~3. 1. The Council will only support the conversion of larger home(s) into smaller self-contained units (C3) and hotels (C1) where:~~

~~(a) It is located in a Metropolitan, District or Local Centres (as identified in Appendix 5);
(b) The gross floor area of the property exceeds 130 sq.m where two units are proposed and exceeds 15080 sq.m where three or more units are proposed;
(c) No significant loss of character or amenity occurs to the area as a result of increased traffic, noise and/or general disturbance; ~~and~~
(d) Appropriate car and cycle parking provision are provided in accordance with the Council's Parking Standards (Appendix 7);
(e) it meets the national space standards; and
(f) the conversion provides at least one larger family sized home of 74sqm (3 bed plus) on the ground floor with access to a dedicated rear garden of the converted home.~~

~~4. 2. The Council will only support the conversion of larger house(s) into Buildings in Multiple Residential Occupation (Sui Generis) where:~~

~~(a) The gross floor area of the property exceeds 1580 sq.m;
(b) It meets the requirements of criteria 3 (a), (c) and (d) above; and
(c) It provides a Management Plan.~~

4.2 Add the following sentence to the end of paragraph 2.12.5 for clarity on how over-concentration will be assessed as follows:

In assessing if there is an over-concentration of dwelling conversions and Buildings in Multiple Residential Occupation in an area, regard will be given to the cumulative impact of parking, noise, overcrowding and waste affecting the general street scene.

4.3 Add the following sentence to the end of paragraph 2.12.6 for justification of modified size floor areas as follows:

It is important that dwelling conversions and Buildings in Multiple Residential Occupation provide satisfactory living conditions for both the benefit of occupiers and neighbours. The threshold of 130 sq.m and 180 sq.m are the smallest floorspace which could successfully incorporate two or three self-contained units, of which one is 'family sized' (e.g. 3 bed plus) and sufficient space for appropriate access arrangements. This has been based on the National Space Standards.

- 4.4 Amend the end of paragraph 3.12.8 for justification for criteria 4 (c) as follows:

Proposals for Buildings in Multiple Residential Occupation should provide a management plan. The effective management of an Buildings in Multiple Residential Occupation can significantly reduce the negative impacts on amenity of neighbouring properties and improve the quality of living for occupants. The management plan could address issues related to waste and recycling collection, management of communal areas (both internal and external), appropriate health and safety checks and management of excessive noise.

- 4.5 Amend the beginning of paragraph 3.12.9 for justification for 3 (a) as follows:

By their nature dwelling conversions and Buildings in Multiple Residential Occupation are more intensely used. Given this, it is best to locate them in areas with good public transport accessibility which are in close proximity to local shops and services. Dwelling conversions and Buildings in Multiple Residential Occupation are therefore supported in the borough's town centres. ~~Town centre and more conducive to higher density and flatted development as they are highly accessible and provide a wide range of services.~~

- 4.6 The Council considers that the above modifications will ensure that LP6 has been positively prepared. In addition, it will ensure sufficient consideration/assessment is given to issues of noise, amenity and parking which are key concerns of local residents. It would seek to ensure quality standards are applied to such development, particularly in relation to internal space and also seek to ensure that the 'loss' of family sized homes and the further erosion of the borough's larger housing stock through conversions are mitigated against with the requirement for a family sized unit (3 bed plus) to be included within any such development.

- v) **How is the stated intention in paragraph 3.12.7 to introduce limits on the proliferation of rebuild flats on small infill sites in areas of established family housing to take effect? Is it justified? Is it consistent with modification 39 (LBR 1.01.2) regarding infill development on previously-developed land?**

- 5.1 The following modifications are proposed in response to the above question. Modifications propose to remove the limits on the proliferation of rebuild flats on small infill sites in areas of established family housing and join paragraph 3.12.7 to the remaining sentence to the end of the previous paragraph 3.12.6:

Consequently, the Council will seek to restrict the conversion of existing family sized housing into flats smaller self-contained units. However, where conversions are considered appropriate, to mitigate the further erosion of the borough's housing stock of larger houses, the Council will

~~require a 'family' sized unit(s) (3 bed plus) to be included within any proposed conversion. and to introduce limits on the proliferation of rebuild flats on small infill sites in areas of established family housing. Flats may be an appropriate part of the dwelling mix on larger self-contained sites within the residential area.~~

5.2 The Council considers that the above modifications are justified, setting out a clearer intent for LP6 resulting in consistency with modification 39 (LBR 1.01.2).

vi) **Other than paragraph 3.13.6 what is the justification for the first sentence of Policy LP7 regarding domestic outbuildings? Paragraph 53 of the NPPF refers to policies to resist inappropriate development of rear gardens with regard to harm caused to the local area. Is such a restriction in the second sentence of Policy LP7 justified given the provisions of Policy LP26?**

6.1 LP7 is a new policy approach to respond to emerging issues in the borough. The Council propose the following modification to LP7 in response to the above question to better articulate the aim of the policy:

~~1. The Council will resist the use of outbuildings ordinarily used for ancillary purposes within a dwelling curtilage or garden as separate sleeping and living accommodation will be resisted. The Council will not support residential development in back gardens unless it is compatible with the use, character, appearance and scale of surrounding context (LP26) and does not unduly impact upon the amenity of neighbouring residents.~~

~~2. The Council will only support the subdivision of existing housing plots and gardens to create new residential accommodation where;~~

~~a) development provides both existing and future occupiers with an appropriate level of internal space and external amenity space in accordance with LP29;~~

~~b) it meets the design requirements of LP26; and~~

~~c) it provides its own independent access.~~

6.2 The Council propose the following modification to paragraph 3.13.6 to provide additional justification for the first sentence of policy LP7:

The Council has seen an increase of illegal accommodation in sheds and outbuildings – 'Beds in Sheds'. 'Beds in Sheds' are usually built in the rear gardens of residential properties and may be rented to tenants for sleeping purposes. Such accommodation does not tend to have planning permission for such usage or building regulation consent. Such accommodation is of a poor standard, unfit for human habitation as well as being a significant health and safety risk to occupants. Such accommodation also impacts on the amenity of neighbouring properties, particularly with noise and disturbance. Given the serious problems that

~~*'Beds in Sheds' cause, the Council seek to resist such development. Usually, this type of accommodation is of poor standard, let at high rent to those who are unable to access alternative accommodation.*~~

- 6.3 The Council propose the following modification to paragraph 3.13.5 to clarify position within policy LP7:

~~*The Council will therefore seek to resist buildings that provide additional living accommodation as either a separate dwelling or as extensions to the primary living accommodation in back gardens. Whilst the Council recognise that some back garden development maybe appropriate, it seeks to ensure that such development provides occupants of the existing property and occupants of the new development with a quality internal and external environment. In addition, such development should not cause harm to the amenity of neighbouring properties and should provide its own independent access.*~~

- x) Is there suitable provision for gypsy and traveller accommodation having regard to the Planning Policy for Traveller Sites (PPTS)? Are the criteria in section 2 of Policy LP8 fair and would they facilitate the traditional and nomadic life of travellers while respecting the interests of the settled community in line with paragraph 11 of the PPTS?**

- 10.1 Yes, the Local Plan does include suitable provision for gypsy and traveller accommodation having regard to the PPTS.
- 10.2 The Gypsy and Traveller Accommodation Assessment Update (2016) (LBR 2.02) provides a robust assessment of current and future need for Gypsy, Traveller and Travelling Showpeople accommodation in Redbridge. The update also considered a change to the definition of Travellers for planning purposes.
- 10.3 Overall, the update found a potential need for a total of 7 additional pitches for Gypsy and Travellers over the plan period. Within the first five years, a total of 2 additional pitches is required. The main reasons for the increase is that there are now more and older children living on site. The update also concluded that the existing Gypsy and Traveller site, Northview Caravan Site, Forest Road has the capacity to accommodate this additional need. Therefore, there is no requirement to identify any additional sites to meet the need over the plan period.
- 10.4 In line with paragraph 9 of the PPTS, and to respond to the above evidence, the Council has set, through policy LP8 criteria 1 (b), the pitch target for gypsies and travellers to meet the needs of Gypsies and Travellers over the plan period.
- 10.5 Gypsy and Traveller accommodation as with mainstream housing, requires sites of suitable quality in terms of access, design, amenity, access to

local services and community infrastructure including education and health facilities. However, the Council considers an additional criterion should be added to clarify that the only difference of site suitability compared to other forms of housing is in relation to flood risk. As caravans are regarded as a 'highly vulnerable use' in national flood risk policy and guidance, this means they should not be stationed in flood zone 3 and should only be exceptionally located in flood zone 2.

10.6 It is acknowledged that modifications are required to the criteria in section 2 of policy LP8 to ensure they are fair and would facilitate the traditional and nomadic life of travellers while respecting the interests of the settled community, in line with the PPTS.

10.7 Amend the second part of LP8 as follows:

2 Development of any additional temporary or permanent Gypsy and Traveller accommodation will ~~only be supported where: permitted subject to all of the following criteria:~~ only be supported where:

- a) The site provides for an appropriate layout, in terms of pitches, amenity buildings, hard-standings and open spaces;
- b) the site is not located in the Green Belt, unless there are very special circumstances; ~~Does not have any relevant planning policy designations that restrict the use of the site such as Site of Special Scientific Interest, Green Belt, Playing field, Principal Site of Nature Conservation Importance, Site of Local Nature Conservation Importance, Local Nature Reserve and Allotments;~~
- c) The site is located in flood zone 1 or exceptionally in flood zone 2 and is otherwise suitable for development;
- d) The site is serviced by a suitable access road and is accessible from the public highway and adequate provision for parking, turning and servicing on site to ensure road safety for occupants and visitors;
- e) The site is well related to existing communities and accessible to local services and facilities, such as shops, ~~primary and secondary schools,~~ healthcare and public transport;
- f) Proposals are sensitive to local character and surroundings ~~The use of the site would have an undue effect on the amenity of occupiers of adjoining land; and~~
- g) ~~The use of the site would have an undue effect on the visual amenity of the locality.~~
- g) arrangements are put in place and set out in a management plan, to ensure the proper management of the site in line with the above requirements.

- 10.8 To reflect the above, it is considered necessary to modify the supporting text. Insert the following, after paragraph 3.14.4:

The Council will continue to manage the borough's existing Gypsy and Traveller sites to meet the needs of the Gypsy and Traveller communities and, to ensure integration with surrounding communities. Policy LP8 includes a series of criteria that will be used to determine any future additional site's capacity and suitability to provide Gypsy and Traveller accommodation in the configuration proposed.

The suitability of the site for use as a Gypsy and Traveller site is an important consideration. Green Belt will not be acceptable unless very special circumstances exist, as per national and London Plan policy. In addition, like mainstream housing, Gypsy and Traveller accommodation requires sites of suitable quality in terms of availability of supporting infrastructure (waste management, utilities, communal spaces), accommodation and access for large vehicles, amenity, and avoidance of excessive exposure to noise and other environmental pollutants. All such needs should be set out and met on site through the proposed design and necessary management plans, demonstrating that they will deliver appropriate housing quality and highway safety, capacity and environmental quality.

The availability of supporting community infrastructure such as health, education and transport links is also essential. The site should be in a sustainable location and should be in reasonable proximity to local services and facilities.

To help deliver sustainable communities and quality placemaking, the policy requires proposals to consider the amenity of new residents and impact on surrounding communities. In doing so, regard will be had to community cohesion, integrating the site and the local community.

The Council will continue to engage with neighbouring boroughs and districts to ensure that sub-regional need is appropriately addressed and provided for. Monitoring and continuing engagement will inform the review of the evidence base and assessment of whether that evidence base and associated policy remain up to date

- xi) In Policy LP13 how is an over concentration of hotels, boarding and/or guest houses in criterion 2(c) to be assessed? Is this policy consistent with Policy LP6 which seeks to prevent the sub-division and change of use of large houses?**

- 11.1 The Council propose the following modifications to policy LP13 in response to the above question. The Council propose to delete criterion 2(c) related to 'over concentration' is proposed to be deleted. The Council propose to

modify LP13 to ensure consistency with the approach in LP6 to resist the potential loss of large houses:

1 The Council will only support proposals for new hotel facilities and tourist accommodation such as hotels, hostels, boarding and/ or guest houses, bed and breakfast (use class C1) in the following locations:

(a) ~~Investment and Growth Areas, Metropolitan and, District and Local centres;~~ or

(b) Locations which have good public transport connections to central London and/ or international or national transport hubs;

2. New hotel and tourist accommodation should meet ~~The Council will support proposals for tourist accommodation such as hotels, hostels, boarding and/ or guest houses, bed and breakfast (use class C1) (including the conversion of existing buildings into tourist accommodation) where all of the following criteria are met:~~

(a) The size and character of the site or building ~~are~~ is suitable for the proposed use;

(b) The proposed use will be compatible with the character and appearance of the area;

~~(c) The proposal does not result in an over concentration of hotel, boarding and/ or guest houses in that particular locality;~~

(d) The residential amenities of local residents will not be unduly affected through noise, disturbance, loss of light or privacy;

(e) The existing environment or transport system will not be adversely affected by way of unacceptable increases to traffic and parking in the area; ~~and~~

(f) The proposal has adequate servicing arrangements and provides the necessary off-highway pickup and set down points for taxis and coaches;

(g) Meet the cycle and car parking standards set out in appendix 7; and

(h) Does not result in the loss of residential accommodation.

xii) How are the aspirations in criterion 4 of Policy LP15 on managed workspace to be achieved?

12.1 It is intended that the aspirations of criterion 4 will be secured through the appointment of managed workspace providers, who through leasing commercial space, can then offer flexible arrangements to SMEs for renting desks, studios, offices etc. A range of such providers in London exists in the London Workspace Providers Directory, and it is envisaged that their appointment would be secured through use of planning obligations. To clarify this approach, it is suggested that LP15 criterion 4 is modified as follows:

"Seeking, through the use of planning obligations, the appointment of managed workspace providers where new business space is provided, the provision of affordable rents, flexible leases, and lettings for desk space to ensure development caters for a range of business needs and users."

xiii) Will Policies LP17 and LP18 be effective in delivering and funding community infrastructure particularly facilities for education, health and well-being? What is the definition of community infrastructure?

13.1 It is acknowledged that policies LP17 and LP18 would benefit from modification to ensure that the key infrastructure requirements identified through the IDP are delivered with the necessary funding in a timely manner, to support growth.

13.2 As such, the Council proposes to include the following paragraph after section 2 of LP17:

The Council will require that new development be accompanied by proposals for the provision of the community infrastructure required to meet the needs arising from that development. The Council will secure delivery of community infrastructure within Development Opportunity Sites in accordance with the policies of Section 3 and Appendix 1 of the Plan.

Within the Investment and Growth Areas, the Council will seek to secure new community infrastructure, where appropriate, as part of mixed use proposals and the key infrastructure listed in Policies LP1A – LP1E. The Council will seek necessary funding of new community infrastructure, including, where appropriate, from development proposals, in accordance with policy LP41 and Appendix 2 of the Plan

13.3 To reflect the latest findings of the Infrastructure Delivery Plan (IDP), amend the 3rd sentence in paragraph 3.24.8 as follows:

There are 71 schools in Redbridge and it is estimated that a further 10 ~~16~~ additional primary schools form of entry and ~~47~~ ~~54~~ secondary schools form of entry will be required over the life of the Local Plan.

13.4 For the purposes of plan-making, community infrastructure can be defined as education facilities, health facilities, sporting and leisure, library services, community care facilities, community centres/halls, playgrounds and open space, cultural facilities, places of worship, facilities for emergency services including police facilities and pubs.

13.5 It is recognised that, as drafted, the infrastructure definition in paragraph 3.28.3 is not as clear as it could be as it also refers to other types of infrastructure addressed through the IDP, but not considered as 'community infrastructure' for the purposes of policy LP17. As such, insert the following modification to the last sentence of 3.28.3:

~~The following infrastructure is covered by this policy~~ For the purposes of this policy, community infrastructure is defined as:

- *Education (including early education, primary and secondary schools, further education and adult community learning);*
- *Health (including local health clinics and district hospitals);*
- *Library Services;*
- *Sporting and Leisure Facilities;*
- *Community Care Facilities;*
- *Cultural Facilities;*
- *Places of Worship;*
- ~~*Waste Management and Disposal;*~~
- *Public Emergency Services (fire/police);*
- ~~*Electricity and Gas;*~~
- ~~*Water and Sewerage; and*~~
- *Public Houses;*
- *Community centres/halls; and*
- *Playgrounds and open space.*

xiv) Does the Local Plan make clear, for at least the first five years, what infrastructure is required, who is going to fund and provide it and how it relates to the anticipated rate and phasing of development in accordance with the Planning Practice Guidance (PPG) on *Local Plans* (ID 12-018-20140306)?

14.1 In line with paragraph 018 of the PPG, Appendix 2 of the Local Plan identifies a schedule of key infrastructure projects necessary to support growth. As with any list of this nature, and as is anticipated by the NPPF at paragraph 177, there is more certainty and detail regarding infrastructure which is programmed to be delivered in the early part of the plan period. There is nevertheless considered to be at least a “reasonable prospect” that all anticipated infrastructure is deliverable and will be delivered in a timely fashion, as required by the Framework at paragraph 177. The delivery of items beyond this timeframe will be subject to further feasibility and availability of funding.

14.2 It is recognised that paragraph 3.24.7 would benefit from modification to ensure that the work carried out as part of the IDP (2017) is sufficiently

referenced in LP17 and supporting text. Insert the following to the end of paragraph 3.24.7 as follows:

There is more certainty and detail regarding infrastructure which is programmed to be delivered in the first five years of the plan. Policies LP1A-LP1E directly make provision for infrastructure including references to the need for new schools and health facilities, in particular, on the key strategic sites. For the later stages of the plan period, delivery of infrastructure items will be subject to further feasibility and funding.

xv) Under criterion (g) of Policy LP17 is it justifiable to require the re-provision of facilities elsewhere in the borough if there is no longer a need for the existing use within the local community? Will criteria i – iv be effective?

15.1 The Council acknowledges that as drafted, criterion (g) of the policy needs modification, particularly in light of criterion 1 (b).

15.2 It is suggested that criterion (g) i-iv be modified as follows:

~~(g) Resisting the loss of existing lawful community infrastructure. Where proposals involve the loss of infrastructure this will only be supported where:~~

~~(i) It is clearly demonstrated that there is no longer a need, **within the local community** for the existing use **or for re-use of the building or site for any other community use** within the local community"~~

~~(ii) The building is no longer suitable;~~

~~(iii) The facilities in the building are being re-provided elsewhere in the borough; **and-or**~~

~~(iv) There is sufficient provision nearby~~

xvi) What is the justification for requiring major developments to include health impact assessments in Policy LP18? What evidence is there that such developments are expected to lead to significant impacts are referred to in the PPG on *Health and well-being* (ID 53-004-20140306)?

16.1 London Plan policy 3.2 states that "the impacts of major development proposals on the health and wellbeing of communities should be considered, for example through the use of Health Impact Assessments (HIA).

16.2 The Council considers it wouldn't be reasonable to require a HIA on all major developments (i.e. over 10 units). However, there will be cases, for example, on the Green Belt strategic sites where a significant amount of growth including a mix of uses is being proposed, that would justify a HIA to be submitted. The requirement of a HIA will provide a mechanism for assessing the potential impacts of a development on health, both positive and negative. Ensuring that issues are considered at an early stage of the planning process could potentially lead to better quality and more sustainable development that supports healthy communities.

16.3 As such, it is considered that policy LP18 ii is modified as follows:

Proposals for major development schemes to include a Health Impact Assessment (HIA) relative to the scale of development proposed.

Annex 1 – Number of Hot Food Take Aways (HFT) within 400m of existing schools within the borough

Table 3 – Nos of HFT within 400m of existing secondary schools

School	No. Takeaways within 400m
Beal High School	1
Caterham High School	0
Chadwell Heath Academy	0
Ilford County High School	4
Isaac Newton Academy	0
King Solomon High School	4
Loxford School of Science and Technology	0
Mayfield School	0
Oaks Park High School	2
Palmer Catholic Academy	9
Seven Kings High School	0
The Forest Academy	0
The Ursuline Academy Ilford	9
Trinity Catholic High School	0
Valentines High School	10
Wanstead High School	0
Woodbridge High School	0
Woodford County High School	4

Table 4 - Nos of HFT within 400m of existing primary schools

School	No. Takeaways within 400m
Aldborough Primary School	1
Aldersbrook Primary School	0
Avanti Court Primary School	1
Barley Lane Primary School	4
Chadwell Primary School	0
Christchurch Primary School	6
Churchfields Infants School	2
Churchfields Junior School	5
Cleveland Infants School	13
Cleveland Junior School	13
Clore Tikva Primary School	5
Coppice Primary School	1
Cranbrook Primary School	0
Downshall Primary School	1
Fairlop Primary School	1

School	No. Takeaways within 400m
Farnham Green Primary School	0
Fullwood Primary School	0
Gearies Primary School	4
Gilbert Colvin Primary School	0
Glade Primary School	0
Goodmayes Primary School	6
Gordon Infants School	4
Grove Primary School	0
Highlands Primary School	0
Ilford Jewish Primary School	4
Issac Newton Academy Primary	1
John Bramston Primary School	1
Loxford School of Science and Technology	0
Manford Primary School	2
Mayespark Primary School	0
Mossford Green Primary School	11
Newbury Park Primary School	4
Nightingale Primary School	0
Oakdale Infants School	5
Oakdale Junior School	2
Our Lady of Lourdes Catholic Primary School	0
Parkhill Infants School	0
Parkhill Junior School	0
Ray Lodge Primary School	4
Redbridge Primary School	0
Roding Primary School	4
Seven Kings Primary School	0
Snaresbrook Primary School	3
South Park Primary School	1
SS Peter and Pauls Catholic Primary School	2
St Aidans Catholic Primary School	0
St Antony's Catholic Primary School	0
St Augustines Catholic Primary School	4
St Bedes Catholic Primary School	0
Uphall Primary School	5
Wanstead Church Primary School	7
Wells Primary School	0
William Torbitt Primary School	3
Winston Way Primary School	17
Woodlands Primary School	0

Annex 2 - Reference List

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Annex 3 - Appendix 5 – Town Centres and Key Retail Parades

Metropolitan Centre

- Ilford

District Centres

- Barkingside
- Chadwell Heath
- Gants Hill
- Green Lane
- South Woodford
- Wanstead

Local Centres

- Goodmayes
- Green Lane
- Ilford Lane
- Manford Way
- Seven Kings
- Woodford Bridge
- Woodford Broadway/ Snakes Lane
- Woodford Green

Key Retail Parades

- 110-122, 217-229, 249-261, 265-273 Aldborough Road
- 89-95 Aldersbrook Road
- 45-55 Atherton Road
- 1-3 Beattyville Gardens & 779-793 Cranbrook Road
- 1-35, 2-18 Beehive Lane, 439-461 Cranbrook Road
- Highview Parade, 1-11 Redbridge Lane East, Corner of, 202 Beehive Lane, Spurway Parade, Woodford Avenue
- 80-90, 71-89b Belgrave Road
- 95, 103-127 Belgrave Road
- 154-154 Broadmead Road, Woodford Green
- 64-70, 65-79, 105 Chadwell Heath Lane
- 524-542 Chigwell Road
- 1-14 Claybury Broadway
- 225-241 Clayhall Avenue
- 552-586, 604-606, 632-650, 685-713, 733 Cranbrook Road, 10 Gants Hill Crescent
- 105, 109-127, 158-168, 208, 250-260 Fencepiece Road, 1, 35-57 New North Road
- 115-129, 130 Eastern Avenue
- 1-6 Fullwell Parade
- 123-143 Gordon Road, 279 Hampton Road
- 19-59, 63, 96-98 Green Lane

- 126-140 Hermon Hill
- 211-249, 253-269, 168-218 High Road Woodford Green
- 314-320, 316 to 324, 332-356, 370-378, 392-418, 399-415, 474 Ilford Lane, 1 Roman Road
- 309-365, 322-366 Ley Street, 1 Vicarage Road
- 80-90 Leyswood Drive
- 561-567 Longbridge Road
- 165-173 Longwood Gardens/1-15 Longwood Parade, Dr Johnson PH
- 358-368 Manford Way
- 37-61, 74a, 74c, 98-102 Meads Lane
- 194-204, 206-218, 209-223 New North Road
- 593-603 New North Road
- 214-226 Redbridge Lane East, 2-14 Roding Lane South
- 119-141, 122-132 Woodlands Road, 116 Windsor Road
- 108-134 Horns Road, 2-4 Tring Close
- 3, 41-49, 55, 18, 56-58, 68, 74 Chigwell Road
- 902-910, 731-755, 940-994 Eastern Avenue
- 341-347 Chigwell Road
- 85 Barley Lane
- 99-109 Goodmayes Lane
- 169 Barley Lane, Little Heath
- 1-2 Aldborough Parade, Aldborough Road North
- 117 Aldborough Road South
- 86-100, 110, 137-147, The Beehive, 151 and 86-110 Beehive Lane, 293-295 Eastern Avenue
- 635, 639-645 Cranbrook Road, Gants Hill
- 1-12 Station Parade, 1-4 Station Approach, Gwynne House, Countrywide House. Wanstaed High St
- 1-8 Station Parade, Cherry Tree Rise
- 113-119 Maybank Road, South Woodford
- 1033-1087 High Road, Chadwell Heath
- 333-445, 461, 378 High Road (East of Ilford west)
- 543-561, 490-492, 500-540 High Road (East of Ilford (east))
- 710-730, 736-756, 768 Eastern Avenue, Grays Corner, Central Parade, 544-570, 623 Ley St
- 732-742 High Road
- 89-97, 109-111, 129-135, 145, 153, 225, 229, 190-194, 208, 258, 298-310 Green Lane, 24 South Park Drive
- Forest Farm Shop, Forest Road, Hainault