

**LONDON BOROUGH OF NEWHAM**

**LOCAL PLAN INDEPENDENT EXAMINATION IN PUBLIC**

**WRITTEN STATEMENT**

**MAIN MATTER 10:**

**DESIGN**

**WE ARE NEWHAM.**

**Note:** Where modifications are proposed as part of the responses below, text to be removed is set out in ~~strike through~~ font and new text is set out in **bold** font.

### **BFN2 Co-designed masterplanning**

Q10.1 Is policy BFN2 justified and consistent with national policy and the London Plan? In particular:

- a) The requirement for a Meanwhile Use Strategy in part 4.
- b) The requirement for post occupancy surveys in part 5.

### **Council Response:**

- 1.1 The Council notes that the existing Local Plan (2018) includes a masterplanning requirement through Policy S1 Part 3, which [the Inspector](#) at the time considered to be essential to the delivery of the Plan and recommended a modification to require further information from developers as part of the masterplanning process (paragraph 17). Policy BFN2 represents a continuation of this approach, which has been effective in creating the conditions to bring different land interests and stakeholders together to develop appropriate, effective masterplans.
- 1.2 NPPF 20 requires boroughs to plan strategically to meet a range of needs, which the Council considers is achieved to a proportionate level of detail through the Local Plan policies and site allocations. Further, NPPF 40-42 recognises the importance of front-loading planning processes in order to resolve issues as early as possible, particularly where fundamental issues need to be considered, and places a responsibility on LPAs to encourage engagement with the local community and with statutory and non-statutory consultees.
- 1.3 National Planning Guidance on Design: process and tools, paragraph 26-007-20191001, sets out that masterplans can help to clarify design expectations early in the planning process, inform infrastructure and viability assessments and identify requirements for developer contributions or other investment holistically across a site.
- 1.4 In the Newham context, the requirement for masterplanning is essential to ensuring that the vision and objectives of the plan and its site allocations are achieved, and that efficient use of land is made, in line with the NPPF, the National Design Guide (particularly Paragraph 20), and London Plan policies D1 and D3. This is because strategic delivery for a range of uses and infrastructure is planned primarily through large sites, coming forward over many years of phased delivery, and with varied ownership and use stakeholders.
- 1.5 Policy BFN2 therefore represents a natural continuation of the strategic planning process into the development delivery phase. The policy synthesises and brings together strategic requirements from across the plan that have a bearing on strategic outcomes to be achieved through masterplanning processes for site allocations and other large developments (see the list of Policy Links). By placing the onus of masterplanning at the pre-planning and planning application stage, policy BFN2 enables the Council to achieve an appropriate balance between steering key developments through the Local Plan and being flexible enough to respond to likely changes in context which might occur during the plan period.
- 1.6 Comments received at Regulation 19/22 identified support for the policy approach from developers and residents, with some comments resulting in proposed modifications to the policy or its implementation text in order to ensure it is clear, consistent with other policies, and effective. The modifications proposed (SD004) relate to implementation of the whole life carbon approach consistent with policy CE3 (MO13), clarification that

comprehensive development is linked to how whole sites are planned, rather than phasing of delivery (MO12.1 and MO12.2), and clarification that post-occupancy surveys should achieve a proportionate response rate (MO14).

- 1.7 a) The London Plan, policies SD7 (Part C.7), D8 (Part M), H3 and HC5 (Part A.4) recognise the value of using vacant land and buildings for temporary interventions while it is awaiting longer-term, permanent transformation. Supporting paragraphs (e.g. 3.8.12, 4.3.2, and 7.5.7) highlight the potential benefits of meanwhile uses, including activation of sites through public realm, reducing risk of antisocial behaviour, providing affordable accommodation or employment space, and short-term source of revenue for the local economy. It also recognises that parameters for any meanwhile use, particularly its longevity and associated obligations, should be established from the outset, and that meanwhile uses should continue to be managed for their amenity impacts and to prevent delays to permanent development coming forward.
- 1.8 In November 2020, the GLA published '[Meanwhile Use London – A Research Report](#)' highlighting case studies of meanwhile use projects taking advantage of a short window of opportunity. The report identifies meanwhile interventions as tactical components of wider strategies of planned change, which can help in shaping positive urban transformation.
- 1.9 Building on this study, the Newham Characterisation Study Chapter 9 identifies meanwhile uses as a key element of placemaking towards the Council's objective of Enabling Cohesion and Celebrating Diversity. It recommends that projects that include unused buildings and vacant land should include a meanwhile uses strategy that aims to activate the site, establish connections with the wider community and build the identity of new neighbourhoods.
- 1.10 Therefore, Policy BFN2 Part 4 is justified and consistent with the London Plan.
- 1.11 b) National Planning Guidance on Design: process and tools, paragraph 26-001-20191001 recognises that well-designed places can be achieved by taking a proactive and collaborative approach at all stages of the planning process, from policy and plan formulation through to the determination of planning applications and the post approval stage. Guidance paragraph 26-015-20191001 further recognises the importance of monitoring compliance with approved plans and conditions.
- 1.12 The concept of developers being asked to support planning authorities with tracking of the implementation of approved schemes post completion is not new, for example monitoring of Travel Plans, Air Quality Assessments, and the 'Be Seen' energy monitoring approach are all established in the London Plan as reasonable post-delivery conditions and obligations where monitoring is undertaken by the developer and shared with the planning authority.
- 1.13 Post Occupancy Evaluation forms part of the RIBA Plan of Work under Stage 7: In use. There has been a growing body of research into the benefits of post occupancy surveys as a monitoring and case study tool, and the need for these to become more mainstream, including from the RTPI ([Planning and Design Quality, 2019](#)) and the RIBA ([Building Knowledge: Pathways to Post Occupancy Evaluation](#), 2017). In 2024 the GLA published its [Delivering Post Occupancy Evaluation Process Note](#), as Good Growth by Design guidance, indicating the strong support of the GLA for a wider uptake of the process. Building on case studies, the guidance recognises that the post occupancy evaluation process assesses the performance of a building through surveys and interviews, providing valuable data to compare assumptions made in the early design phase with the actual ability of a development to meet residents' needs, from the scale of the neighbourhood to individual homes, and building management.

- 1.14 The GLA's [Good Growth by Design guidance](#) on Safety in Public Space - Women, Girls and Gender Diverse People (2023) and Designing with Disabled Experience (2025), as well as the LLDC (2024) Creating places that work for Women and Girls - Handbook for Local Authorities, Developers and Designers (EB028), all recognise the importance of Post-Occupancy Evaluation in identifying the extent to which places deliver on masterplanning premises equitably.
- 1.15 Reflecting the growing understanding within the development industry, the requirement for post occupancy evaluation of policy BFN2 has received broad support from developers as evident from Regulation 19/22 representations received (SD020), with comments relating primarily to the request for further implementation guidance.
- 1.16 Therefore, BFN2 Part 5 is justified and consistent with national policy and the London Plan.
- 1.17 However, in order for the policy to be effective and consistent with its justification and implementation, the Council propose a modification to clarify the policy aim for which post occupancy surveys are required:
  5. All developments on site allocations are expected to **demonstrate commitment to delivering the placemaking and socio-economic masterplanning aims approved, by undertake undertaking** post occupancy surveys and **share sharing** the results with the Council.

## D1 Design standards

Q10.2 Is policy D1 justified and consistent with national policy and the London Plan? In particular:

- a) The reference to "Council-led" design guidance in part 1(a)
- b) The requirement for major developments to achieve Secured by Design Silver Award in part 3.
- c) The requirements relating to temporary buildings in part 4.
- d) The requirement for certain applications to be assessed by the Newham Design Panel and any community and/or youth design review panel appointed by the Council in part 4.

## Council Response:

- 2.1 Yes, Policy D1 is justified and consistent with national policy and the London Plan. NPPF 132 and 135 and the National Planning Guidance on Design: process and tools (paragraph 26-001-20191001) require planning policies to support the delivery of good design by setting out the design outcomes that development should pursue as well as the tools and processes that are expected to be used to embed good design.
- 2.2 London Plan Policy D1 sets out the process and scope for undertaking character assessments, which has informed the preparation of the Characterisation Study and its guidance and recommendations. Further, London Plan Policy D3 Part D sets out broad design principles and criteria.
- 2.3 In line with the NPPF, PPG and the London Plan, the council undertook community and stakeholder engagement as part of the preparation of the Characterisation Study (the engagement report is appended to chapter 11, EB021), followed by engagement as part of the Local Plan making stages, resulting in identification of locally relevant design themes and the refinement of the policy requirements between Regulation 18 and Regulation 19, and through clarification and consistency modifications proposed in

the 'Schedule of proposed modifications to the Regulation 19 Draft Submission Local Plan' (SD004).

- 2.4 Policy D1 is consistent with the NPPF and the London Plan and represents Newham-specific principles of good design, synthesized from a range of evidence and best practice guidance, as set out in the Plan (pg. 54), including:
- The National Design Guide and National Model Design Code (NPPF 133);
  - The Building for a Healthy Life standard (recognised in NPPF 138); and
  - The Characterisation Study, particularly the recommendations set out in Chapter 9 on a range of key themes (EB019)
- 2.5 a) The Council supports and makes use of many sources of best-practice design guidance developed by national agencies and the GLA, in addition to the Characterisation Study (which also draws on a wide range of best practice), as set out in the implementation section D1.1. Therefore, to ensure clarity and effective implementation, the Council has put forward a modification to policy D1 Part 1 (reference MO17) to clarify this approach to supporting adopted design guidance/codes more broadly that would form part of the development plan, as well as guidance that the Council has specifically signalled support for.
- 2.6 b) Monitoring indicates that crime rates in Newham tend to be higher than the London average, and that many residents report a fear of crime including during the day (see Equalities Impact Assessment supporting data, SD007, pg. 1937). Safety is a key consideration of design quality as per NPPF 135 and London Plan Policies D3 (Part D) and D11 (Part B), and the Secured by Design framework is a nationally recognised standard maintained and updated by the police service. The approach of imbedding Secured by Design accreditation into policy is already established in Newham through the existing Local Plan (2018) Policy SP3, and is an adopted practice in other London boroughs' Local Plans (e.g. Waltham Forest, [Local Plan Part 1](#) (2024) Policy 58). Therefore, Policy D1 Part 3 is justified and consistent with national policy and the London Plan.
- 2.7 The Council has received representations at Regulation 19/22 from the Metropolitan Police Service that welcomed the continued commitment to Secured by Design accreditation as part of Policy D1 Part 3, with a recommendation to strengthen the approach by allowing flexibility in the level of accreditation to be achieved and by providing additional implementation guidance. Therefore, in order to ensure that the policy is effective and clear, these recommendations have been taken forward through proposed modifications references MO18.1 and MO18.2 (SD004).
- 2.8 c) The London Plan supports meanwhile activation of sites, as set out in response to Q10.1 above. Policy D1 Part 4 provides a complementary approach to BFN2 by setting out the principles of good design where buildings/structures themselves are to be temporary. The policy provides a positive approach that aims to clarify how the Council intends to balance between offering planning flexibility for temporary buildings/structures and securing long term quality development, and recognising that in Newham temporary developments have often come back for extensions of time. Following comments received at Regulation 19/22 requesting further clarity on the policy approach, the Council has proposed a modification to the implementation section D1.4, set out under reference MO20 (SD004).

- 2.9 d) Policy D1 Part 5 is consistent with national and London Plan policy, and justified. The importance of achieving good placemaking by making use of effective community engagement and of impartial, expert design review is set out through the NPPF 137 and 138, National guidance on Design: process and tools (paragraphs 26-009-20191001 and 26-022-20191001). It is also supported by London Plan Policy D4. Further, one a key objective for the Local Plan is to create a framework that will empower Newham's residents to participate in the life of the borough and the work that the Council does. Newham operates one of the longest-standing Design Review Panels, run in accordance with the principles of the London Quality Review Charter. Its value in improving the quality of reviewed schemes is recognised through monitoring (EB002, pg. 20).
- 2.10 Further, as the Characterisation Study and other evidence show, Newham is a diverse borough with specific cultural and wellbeing needs that can be more effectively addressed in design by engaging directly with representatives of the communities here. While the Council does not currently operate a community and/or youth design review panel, the policy is worded flexibly to allow implementation in the interim while safeguarding the intended design oversight empowerment of such a group.

## **D2 Public realm net gain**

Q10.3 Is policy D2 justified and consistent with national policy and the London Plan? In particular:

- a) The requirement in part 3 for major developments referable to the Mayor to make proportionate contributions towards public realm enhancement and maintenance beyond the site.
- b) The requirement in part 5 for a Public Realm Management Plans

### **Council Response:**

- 3.1 Yes, Policy D2 is justified and consistent with national policy and the London Plan. Improving the quality of the public realm is a key element in achieving the Council's objectives of creating people-friendly neighbourhoods and a safer, people-powered Newham.
- 3.2 NPPF 135 requires Local Plans to set out policies that will ensure that development will function well and add to the overall quality of the area, including by establishing or maintaining a strong sense of place by using the arrangement of streets, spaces, building types and materials to create attractive, safe, inclusive, accessible, welcoming and distinctive places. The National Design Guide and the National Model Design Code also place great significance on ensuring that development integrates into its wider environment, including through careful understanding of the existing local movement network (i.e. the public realm of streets) and the wider offer of activity in the area (i.e. including the public realm of green spaces, play spaces etc.).
- 3.3 National guidance on 'Design: process and tools' supports the use of frameworks to secure quality of design (paragraph 26-018-20191001), such as the GLA's Public London Charter and TfL's Active Travel Zone Assessment.
- 3.4 London Plan policy D8 supports boroughs to develop policies for the creation of new public realm and the enhancement of existing public realm, and to provide principles of good design that address the important and multi-faceted functions of the public realm in their area. Further, Part H requires borough's Local Plans to ensure appropriate

management and maintenance agreements are in place, in accordance with the Public London Charter.

- 3.5 The evidence base supporting the policy, and particularly the Characterisation Study borough-wide recommendations on public realm (EB019, sections 9.1.3, 9.1.4, and 9.3.1), provides the guidance that have informed the principles and criteria set out in policy D2. The Characterisation Study also recommended that the Council should manage public realm areas in accordance with the Mayor of London's Public London Charter (EB019, sections 9.1.3).
- 3.6 The Policy has received support (SD021 and SD037) from a range of duty to cooperate partners, including Historic England, Sports England, the Metropolitan Police Service, NHS HUDU, the Environment Agency and Transport for London, as well as developers.
- 3.7 a) Policy D2 Part 3 is justified and consistent with national policy and the London Plan. Policy D2 Part 3 has undergone a process of refinement between Regulation 18 and Regulation 19, from applying to all major developments that would need a travel assessment to focusing on those that would require an Active Travel Zone Assessment, i.e. development referable to the Mayor of London, as recommended by Transport for London. This approach therefore means that the larger schemes will be required to make proportionate contributions to enhancing the wider area's public realm, reflecting not just the likely nature of these developments to generate more impact that should be mitigated, but also their higher likelihood of delivering new streets and other forms of public realm that should integrate within the site's wider context. Furthermore, the policy provides a transparent and clear framework through which contributions are sought, with the methodology for calculating the extent of the contribution consistent with the Council's existing development management practice. The Viability Report (EB099, pg. 69) did not consider this policy to result in abnormal costs, with the modest requirements being able to be incorporated within the wider allowances for developer contributions.
- 3.8 b) As set out above, the requirement for a Public Realm Management Plan, which the implementation section provides further guidance on this including the Public London Charter requirements as well as maintenance requirements, is in line with national policy and the London Plan Policy D8 Part H, and further justified by the recommendations of the Characterisation Study.

## **D5 Shopfronts and advertising**

Q10.4 Is policy D5 justified and consistent with national policy?
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### **Council Response:**

- 4.1 NPPF 141 recognises the importance of managing the individual and cumulative impacts of advertisements in the interest of amenity and public safety. Policy HS5 Part 2 is consistent with this approach.
- 4.2 Characterisation Study provides guidance to support quality public realm and well-connected neighbourhoods (9.1.3 and 9.2.1) that recognises the importance of well-designed, active frontages, including for non-residential uses. Similarly, the Retail and Leisure Study Recommendation LBN15 recognises the importance of quality



shopfronts and encourages transparent glazing, and high quality and consistent shop frontage design and signage.

- 4.3 Further design guidance aimed at providing safe environments, such as Secured by Design (Development design and layout, paragraph 8.2) and Creating Places That Work for Women and Girls (EB028) , among other sources, highlight the importance of passive surveillance, lighting quality, clear sight lines and mix of activity as important considerations impacting perceptions of safety – all features related to shopfront design that are addressed through Policy HS5 Part 1.
- 4.4 The importance of quality shopfronts and management of advertisements in the Newham context of extensive historic high street type of development is further identified by residents themselves through consultation responses, not just to the Local Plan consultations (particularly at Regulation 18, SD037) but also to Regeneration initiatives Newham High Streets Programme and Stratford Masterplan (summarised as part of Issues and Options Consultation Document, SD010).
- 4.5 Therefore, Policy D5 is justified and consistent with national policy.

## **D6 Neighbourliness**

Q10.5 Is policy D6 justified and consistent with national policy and the London Plan? In particular, the requirement for developments to seek compliance with the best practice standards and guidance set out in Table 2.

### **Council Response:**

- 5.1 NPPF 135 places great importance on creating places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity. National planning guidance provides further information on issues that are suitably addressed through planning, such as air quality (Paragraph: 002 Reference ID: 32-002-20191101), managing land affected by contamination (Paragraph: 006 Reference ID: 33-006-20190722), impacts of noise (Paragraph: 007 Reference ID: 30-007-20190722) and light pollution (Paragraph: 001 Reference ID: 31-001-20191101).
- 5.2 The London Plan promotes residential amenity through Policy D6 Part D and recognises the importance of noise management through Policy D14. The London Plan is supported by a range of guidance aimed at managing a range of amenity impacts:
  - The Control of Dust and Emissions during Construction and Demolition SPG, which seeks to promote best practice in the management of dust and emissions during development so as to promote good air quality.
  - Digital Connectivity Infrastructure LPG, which support planning policies that set out design principles considering specific local conditions – in particular the impacts on visual amenity, access, noise and vibration of DCI installations (Paragraph 4.1.4)
- 5.3 In the Newham context of a mixed-use, dense and intensifying borough as described through the Characterisation Study, amenity and agent of change principles and standards are important to support the delivery of the overall spatial strategy of the Plan. This is recognised through borough-wide recommendations of the Characterisation Study (EB019) under sections 3. Living Well with Increased Density and 4. Managing Industrial and Residential Relationships.
- 5.4 Policy D6 Parts 1, 2 and 3 represents a refinement and continuation of the approach set through existing Local Plan (2018) policy SP8, including updated standards provided in Table 2 in the implementation text, which [the Inspector](#) examining the plan at the time considered justified in the context of increased intensification of housing



across the borough and the need to safeguard industrial functionality (paragraphs 124 and 125). The Integrated Impact Assessment did not consider the removal of these standards to be a reasonable alternative for strategic environmental assessment purposes (SD007, Appendix E, pg. E017).

- 5.5 The addition of the technical standards supporting Policy Part 3 in the implementation section Table 2 allows the Council flexibility in the way these are applied, including in the event that these are updated, replaced or withdrawn.
- 5.6 The 'Agent of change' principle is recognised through NPPF 193 and London Plan Policy D13, and reflected in the Newham context in policy D6 Part 2, which clarifies spatial priorities, and Part 4 which places responsibility on the applicants to demonstrate how technical solutions will safeguard and maintain amenity standards.
- 5.7 Comments received from Tate and Lyle at Regulation 19 (SD021, reference Reg19-E-239/009) raised questions related to the clarity of how a 'reasonable worst case assessment' would operate in relation to the spatial strategy for industrial intensification. In response, the Council has put forward a modification to the implementation section D6.2, which was agreed as part of the statement of common ground (SOCG007). This is set out in the Schedule of proposed modifications to the Regulation 19 Draft Submission Local Plan (SD0004) under MO31.
- 5.8 Similar questions about the clarity of the agent of change approach in relation to safeguarding the principle of future industrial intensification were put forward by SEGRO and Thames Water. A reasonable clarification request to Policy D6 Part 2 was put forward at Regulation 19 by Thames Water with regards to the timing in the planning process when suitable amenity mitigation would be required. While the Council agreed with the principle of this proposal, this was not considered necessary for soundness, as set out in our response under reference Reg19-E-033/026 (SD021, pg. 155).
- 5.9 Therefore, policy D6 is justified and consistent with national and London Plan policy.

## **D7, D8 and D9 Designated and non-designated heritage assets**

Q10.6 Are policies D7, D8 and D9 justified and consistent with national policy and relevant legislation relating to heritage assets? In particular:

- a) Are the areas of townscape value listed in implementation box D7.2, illustrated on a map in the Plan and designated on the policies map justified?
- b) The reference in D7 part 3 to the loss of characteristics which contribute to the significance of conservation areas and areas of townscape value not being supported, without any reference to weighing any public benefits against the level of harm.
- c) Are the archaeological priority areas listed in implementation box D8.1, illustrated on a map in the Plan and designated on the policies map justified?

### **Council Response:**

- 6.1 Yes, Policies D7, D8 and D9 are justified and consistent with national policy and relevant legislation relating to heritage assets. Together, the policies provide a positive framework for the conservation and enjoyment of Newham's designated and non-designated heritage assets, consistent with NPPF 196.
- 6.2 In line with NPPF 198 and 199 and the London Plan Policy HC1, the three policies draw on available historic environment records published by the council, including conservation area appraisal and management plans, and evidence base prepared

under the existing Local Plan (2018) that supported the designation of Areas of Townscape Value and Archaeological Priority Areas, which are being retained. The understanding of Newham's historic environment has informed the assessment of potential for change in the Characterisation Study (Chapter 7, EB014 and EB015), leading to the identification of areas with quality, coherent local character that should be conserved, and which are consistent with policies D7 and D9.

- 6.3 Supportive comments received from Historic England at Regulation 18 (SD037) consultation highlights that the policies are positively prepared, justified and consistent with national policy and relevant legislation.
- 6.4 a) The Areas of Townscape Value represent retained designations from the Local Plan (2018), and themselves being much older local designations identified through characterisation work. [Evidence Base: Areas of Townscape Value](#) was prepared in 2015 to support the designation process of further areas of townscape value, and this evidence continues to be relevant to the new Plan, as listed in the supporting evidence base for the policy (SD002a, pg. 99). The designations have helped the council provide a clear, transparent and consistent approach to managing these clusters of non-designated heritage townscape assets as part of planning applications, including the development of strategic sites for example in Canning Town.
- 6.5 The Planning (Listed Buildings and Conservation Areas) Act 1990 places a duty on Local Authorities to review from time to time whether any parts of their area should be designated as Conservation Areas. The identification of Areas of Townscape Value is an important first step, by signalling the townscape value of these areas and allowing them to be protected to a proportionate level with their non-designated status, with further work needing to be undertaken by the Council post Local Plan adoption to identify whether there is sufficient evidence of significance to justify conservation area designation. This approach is aligned with NPPF 197 and 201 and forms the basis of Policy D7.2. Nevertheless, on review of the policy wording, the Council consider that a modification is required to this policy part to better align with the non-designated status of the Areas of Townscape Value and NPPF 209, as set out below:
2. Developments within areas designated as Areas of Townscape Value or in their settings should seek to ~~conserve~~**sustain** and enhance their character and avoid **and minimise significant harm** which may affect the Council's ability to designate these as conservation areas in the future.
- 6.6 b) Implementation paragraph D7.3 states that consideration of significance and any potential harm will be undertaken in line with the tests set out in the NPPF, thereby providing the framework for harm being justified in relation to development demonstrating public benefits. Nevertheless, for clarity and consistency within the policy itself, the Council propose the following modification:
3. Loss of characteristics which contribute to the significance of Conservation Areas and Areas of Townscape Value will not be supported, **unless demonstrated that all reasonable steps have been taken to avoid and minimise harm and that public benefits proportionately outweigh any harm caused**. Characteristics include [...]
- 6.7 c) Policy D8 is justified and in conformity with NPPF 200 and the London Plan Policy HC1. The Archaeological Priority Area designations on the Policies Map are retained designations from the existing Local Plan (2018), and are justified by the related

[Newham Archaeological Priority Areas Appraisal evidence](#) base published in 2015, as listed in the Plan (SD002a, pg. 103).

- 6.8 Representations received at Regulation 18 from the Greater London Archaeology Advisory Service (GLAAS), which is a part of Historic England, raised that the Council may wish to update the evidence base in order to take account of the findings from fieldwork investigations undertaken since the study (SD037, comment reference Reg18-E-147/023). This was raised as important for the effective implementation of the policy, and the policy itself received support from Historic England (as well as London Historic Parks and Gardens Trust, residents and developer Aston Mansfield). The Council proceeded to engage with GLAAS through its duty to cooperate processes, resulting in agreement and commitment on the part of the Council that the evidence base be updated following the adoption of the Local Plan, as set out in implementation text D8.1, with resulting boundary changes being reflected through an update to the Policies Map.