Local Plan Review

Consultation Statement

November 2017

Statement addressing regulation 22(c) of the Town & Country Planning (Local Planning) (England) Regulations 2012.

This statement sets out how the London Borough of Newham has carried out consultation on its Local Plan Review in accordance with regulations 18, 19 and 20, summarising the main issues raised and how they have been responded to. It should be read in conjunction with the Options Appraisal.

Copies of all representations made in accordance with regulation 20 will be appended to this statement.
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1. Introduction

1.1 Local Plan Review builds on the existing Local Plan comprising the 2012 Core Strategy and 2016 Detailed Sites & Policies DPD by combing the two documents, updating elements that are out of date, (changes to national/regional positions or updates to technology for example) and ensuring the Plan responds to the latest issues and pressures in Newham today. As such the Review, which commenced in 2016, is not a complete overhaul and many elements of the Local Plan approach have remained the same. Therefore, consultation has not focussed on areas that are not subject to review, (though formal engagement at Issues at Options stage affords an opportunity to suggest things that should be reviewed) rather inviting comments on any new policy proposals or site allocations / designations. The engagement evidence based that informed the Core Strategy and the Detailed Sites and Polices DPD is published on the local plan website and can be found at www.newham.gov.uk/localplan

1.2 This document explains how the Local Planning Authority (LPA) has consulted the public as well as other stakeholders and interested parties during preparation of its Local Plan Review (LPR). Engagement processes are guided by the Statement of Community Involvement (SCI - most recently updated in July 2015) and the Town & Country Planning (Local Planning) (England) Regulations 2012.

1.3 Further detail regarding the LPR process, timeline, and the current Local Plan that is the subject of review can be found at www.newham.gov.uk/localplan and www.newham.gov.uk/planningpolicy.

1.3 This SOC covers informal continuous engagement on the Local Plan, Call for Sites and two statutory consultations; known as ‘Issues and Options’ (Reg.18) and ‘Proposed Submission’ (Reg.19).
2 Continuous Engagement

2.1 As per the adopted Statement of Community involvement the Council supports a process of continuous informal engagement in which views relevant to planning, development, and the Local Plan are recorded and analysed outside of formal consultation exercises. This helps to address the relatively low levels of resident engagement in formal consultation and makes efficient use of other forms of Council-wide research and engagement (corporate surveys, member enquiries etc). Activity with particular relevance to Local Plan Review is detailed below.

The Newham Mayor’s Show

2.2 The Newham Mayor’s Show is an annual event that is held in the borough and is open to everyone. This gives the residents, and any other interested parties, the opportunity to speak directly to members of staff from the various service areas in the Council. The Planning Policy team have an interactive stand at this event every year and use the opportunity to speak to as many residents of the borough as possible over a two day period.

2.3 In 2016, people were asked to engage with how town centres needed to evolve to be future proofed, to help revise town centre policies. Responses reinforced the existing policy position, whilst further emphasising the desirability of promoting the evening and night-time economy, various town centre access issues (including pavement congestion and bus over crowding) and the development of key sites such as Queens Market and the East Ham Market Hall.

2.4 The most recent Mayor’s Show took place on the 8th and 9th of July 2017 and focussed on tall buildings and the character of the borough to inform the update to the Character Study and the refresh of the tall buildings and spatial policies. People were asked to think about character SWOTs in their area and what height of building could be acceptable and where. Although this was the
focus of the engagement that was carried out, useful information was
gathered on other issues which have been taken into account when
proceeding with the Local Plan Review, including support for existing policies
on housing, town centres, sustainability, transport and design.

2.5 In relation to tall buildings, most people felt that tall buildings were
acceptable in certain areas, particularly in Stratford and close to stations, as
long as they were well designed and safe, and recognised their role in
addressing housing need and achieving other improvements (eg to town
centres). There was also concern that they would look out of place in the
predominantly low rise area of Urban Newham outside of town centres.

Member’s Working Group

2.6 Newham’s elected ward Councillors are grouped in to seven ‘Community
Neighbourhoods’ covering the whole Borough. As representatives of local
communities facing a variety of planning issues and pressures. Councillors
from each of the Community Neighbourhoods were asked to participate in a
Local Plan Review Member’s Working Group. This representative role is
particularly important given the low levels of direct engagement on strategic
planning issues. The group met five times between December 2016 and
September 2017 to discuss various aspects of the plan and evidence base
and give a locally grounded perspective on various issues and options. In
addition the meetings provided an opportunity for members to bring further
issues to the attention of the planning policy team and for them to take back
updates to the councillors not involved in the meetings, and for this to be
cascaded outwards to local contacts. Further detail regarding the outcomes
of these meetings is provided below.

<table>
<thead>
<tr>
<th>Meeting 1:</th>
</tr>
</thead>
<tbody>
<tr>
<td>• The Vision - strategic objectives, opportunities, threats</td>
</tr>
<tr>
<td>• Housing – especially family housing, high rise housing and the private rental sector</td>
</tr>
<tr>
<td>• Town centres – especially cultural and night time economy</td>
</tr>
</tbody>
</table>
- Infrastructure - capacity

**Meeting 2:**
- Tall buildings policy
- Housing protection
- Site options

**Meeting 3:**
- Tall buildings
- Employment land

**Meeting 4:**
- Character – by community neighbourhood area
- Tall building sensitivities/appropriateness by area

**Meeting 5:**
- Infrastructure planning

The Options Appraisal sets out how these topics have been taken into account and what changes have been made to the policies being brought forward.

**Youth Council**

2.7 A meeting was health with LBN’s Youth Council on the 25th of August 2017. The purpose of this meeting was to give them and insight into plan preparation and to engage on tall buildings and where they thought tall buildings would be appropriate, where they felt they would be inappropriate and what they considered to be tall. Feedback was generally supportive of the tall buildings policy and the strategic approach.

**Corporate Surveys**

2.8 A number of surveys that were carried out on behalf of the Council have been used to inform the Local Plan Review process. The surveys that have been utilised in the course of preparing the Local Plan are; Newham Annual Residents Survey (2015), Understanding Newham (2015), Tenants and Leaseholders Survey (2015) and the Liveability Survey (2015). These surveys ask residents about their levels of satisfaction with, and use of, their area, their housing and their local services, and as such they are of most relevance for overall objectives, housing and infrastructure policies, as well as informing the IIA.
Stakeholder meetings

2.9 Numerous informal discussions with developers and landowners, infrastructure providers, statutory consultees and neighbouring planning authorities, together with the GLA have further informed the formulation of site allocations and policies as follows:

a. Evidence concerning site constraints, deliverability and capacity
b. Technical oversight of policy drafting and how they interact with stakeholders’ statutory obligations (for example, the Environment Agency flood risk management and waste licensing, and Thames Water – water resource planning) ensuring this occurs to mutually beneficial effect
c. Discussion of cross boundary issues and alignment in policy and of technical assumptions (for example, as regards employment land vacancy rates and demand, and housing capacity/supply and markets) – to ensure coherent sub-regional planning.

Technical Evidence Base Preparation

2.10 In the course of the preparation of the technical evidence base, either commissioned consultants or the planning policy team have undertaken a number of topic specific engagement exercises to inform the evidence base, which in turn has influenced policies as detailed in the OAs. This engagement is summarised below by study.
<table>
<thead>
<tr>
<th>Evidence Base</th>
<th>Engagement Type &amp; Number</th>
<th>Draw out qualitative/sense check data</th>
<th>Draw on national or specialist/local experience of issue/sense check</th>
<th>To ensure cross boundary alignments</th>
<th>Influence/Outcome (which policies etc)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Playing Pitch Strategy</td>
<td>Playing Pitch Strategy: Information was gathered from a 11 consultees including Sport England, LBN, Governing bodies of sport and a local sporting clubs, associations and partnerships (including schools)</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>S1, SP2, INF6, INF7, INF8, INF10</td>
</tr>
<tr>
<td>Built Facilities Strategy</td>
<td>Built Facilities Strategy: Comments received from 23 organisations (primarily sports clubs/associations) relevant to 12 separate sports activities.</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>S1, INF1, INF2, INF6, INF8</td>
</tr>
<tr>
<td>Retail Study (update)</td>
<td>Retail Study: household surveys re shopping/expenditure and in survey re travel patterns (shopper trip origin)</td>
<td>✔</td>
<td>✔</td>
<td></td>
<td>S1, INF5, SP9,</td>
</tr>
<tr>
<td>Employment Land Review (update)</td>
<td>Agents workshop: 8 commercial agents/operators attended</td>
<td>✔</td>
<td>✔</td>
<td></td>
<td>Spatial Policies, J1, J2, J3</td>
</tr>
<tr>
<td>Character Study</td>
<td>The Character Study was informed by activities at the Newham Mayor’s Show, Youth Council and Member’s Working Group workshops, and discussion with Historic England.</td>
<td>✔</td>
<td>✔</td>
<td>Spatial policies, SP1, SP3, SP4, SP5</td>
<td></td>
</tr>
<tr>
<td>Infrastructure Delivery Plan</td>
<td>Approximately 120 individual groups were contacted – there were 30 formal responses</td>
<td>✔</td>
<td>✔</td>
<td>Spatial, INF, Homes and SC policies</td>
<td></td>
</tr>
</tbody>
</table>
3 Formal Consultations

Call for Sites

3.1 A London-wide Call for Sites was carried out by the GLA (Greater London Authority) between 15\textsuperscript{th} March and 30\textsuperscript{th} of June 2016 in order to identify sites with the potential for housing development. As well as being publicised by the GLA itself, this exercise was published on the London Borough of Newham (LBN) website with notification sent to all subscribers to the Local Plan Stakeholder Database. This stage gave private, public and voluntary sector bodies and individuals the opportunity to submit potential housing sites for consideration. These sites were added to the wider pool of potential housing sites identified from previous SHLAAs and in the existing plan. In addition, numerous meetings were held with the GLA in relation to the development of the evidence base (related to housing need and supply) as part of their London Plan review process.

3.2 Information gathered was used to inform the proposed site allocations, many sites proposed were already allocated within the Local Plan or fell below the allocation threshold. The Issues and Options consultation provided a further opportunity for developers and site owners to comment on site allocation ideas, as these were publicised in Part 2: Sites (NB further information on the decision-making in relation to site allocations can be found in the Proposed and Existing Strategic Sites Options Appraisals, decisions related to non-strategic sites are considered within thematic Options Appraisals).
3.3 ‘Issues & Options’ consultation was carried out for six weeks between 24th February and 7th April 2017. A notification email was sent to all addresses on our Local Plan Stakeholder Database, the consultation was also publicised on the Council’s website and in the Newham Recorder and The Newham Mag. Copies of the email notification, web copy, and Newham Mag and Recorder publicity can be found in Appendix 1 of this document. The Council’s website confirms that any person can add themselves to the Local Plan Stakeholder Database at any time by emailing a request to local.plan@newham.gov.uk.

3.4 The Issues & Options consultation responds to regulation 18 (preparation of the plan) which states that:

18. (1) A local planning authority must -
   (a) notify each of the bodies or persons specified in paragraph (2) of the subject of a local plan which the local planning authority propose to prepare, and
   (b) invite each of them to make representations to the local planning authority about what a local plan with that subject ought to contain.

Summaries of the issues raised in relation to Part 1 (policies) and Part 2 (sites) are presented overleaf.
## Summary of responses to Part 1 – Policies

<table>
<thead>
<tr>
<th>Topic</th>
<th>Number of Representations</th>
<th>Participants</th>
<th>General Support</th>
<th>Criticism</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Vision and Spatial</strong></td>
<td>15</td>
<td>9 from site owners/developers, 2 from duty to co-operate partners, 3 from community groups and 1 from a resident.</td>
<td>Generally supportive</td>
<td>Calls for some clarifications and alterations on some issues.</td>
</tr>
<tr>
<td><strong>Successful Places</strong></td>
<td>20</td>
<td>14 from developers/site owners, 2 from community groups, 1 from a resident, 1 from a Duty to Co-operate partner and 1 from an infrastructure provider.</td>
<td>Generally supportive</td>
<td>Prescriptive nature of the tall buildings matrix and limits on height of buildings.</td>
</tr>
<tr>
<td><strong>Jobs</strong></td>
<td>19</td>
<td>14 from developers/site owners, 2 from community groups, 1 from a resident, 1 from a Duty to Co-operate partner and 1 from an infrastructure provider.</td>
<td>Generally supportive</td>
<td>Object to setting of targets for end user jobs which should be filled by Newham residents.</td>
</tr>
<tr>
<td><strong>Homes</strong></td>
<td>13</td>
<td>2 residents and 9 developers/landowners.</td>
<td>Generally supportive</td>
<td>Criticism of proposed affordable housing floor and 39% affordable housing.</td>
</tr>
<tr>
<td><strong>Sustainability and Climate Change</strong></td>
<td>15</td>
<td>6 developers/site owners, 6 Duty to Co-operate partners and infrastructure providers and residents (2 groups and 1 individual).</td>
<td>Generally supportive</td>
<td>Criticism of proposed District Heat connection radii and new Greenspace designations.</td>
</tr>
<tr>
<td><strong>Transport</strong></td>
<td>17</td>
<td>3 from individual residents, 10 from developers/site owners, 3</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
from Duty to Co-operate partners and 1 from a Community Group. The representations that were received are generally supportive of the proposed updates to transport policy, however a number of clarifications and additions were proposed.

<table>
<thead>
<tr>
<th>Community Infrastructure</th>
</tr>
</thead>
<tbody>
<tr>
<td>In total there were 13 representations made in relation to Community Infrastructure. These included; 3 residents, 1 community group, 1 charity, 5 site owners/developers, 1 infrastructure provider, and 2 Duty to Co-operate partners. The responses received in relation to this topic were generally supportive. However there was one objection raised by a developer of the requirement for all developments to make a contribution to social and physical infrastructure. Another developer felt that community facilities should be provided for using a text based policy rather than a site specific allocation.</td>
</tr>
</tbody>
</table>

The Options Appraisal document sets out how these responses have been taken into account and what changes have been made to the policies to be brought forward.
### Summary of responses to Part 2: Sites

<table>
<thead>
<tr>
<th>Site</th>
<th>Responses Received</th>
<th>Comments</th>
<th>Other Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Beckton Riverside</strong></td>
<td>3</td>
<td>These comments were supportive of the overall aims of the site allocation. The response to this proposal was mainly positive. However, there were arguments put forward for the removal of the waste allocation and bridge safeguarding.</td>
<td></td>
</tr>
<tr>
<td><strong>Connaught Riverside</strong></td>
<td>3</td>
<td>These comments were supportive of the overall aims of the site allocation. However, a number of clarifications and additions were proposed.</td>
<td></td>
</tr>
<tr>
<td><strong>Lyle Park West</strong></td>
<td>3</td>
<td>These comments were supportive of the overall aims of the site allocation. However, it was proposed that Peruvian Wharf should be included within the site boundary.</td>
<td></td>
</tr>
<tr>
<td><strong>North Woolwich Gateway</strong></td>
<td>2</td>
<td>These responses were generally supportive of the aims of the site allocation. However, it was proposed that Victoria Gardens should be included and Standard Industrial Estate should be full/part released from SIL.</td>
<td></td>
</tr>
<tr>
<td><strong>Thames Wharf</strong></td>
<td>1</td>
<td>The site owner was supportive of the overall aims of the allocation of this site. The height limits for building on the site were objected to.</td>
<td></td>
</tr>
<tr>
<td><strong>Alpine Way</strong></td>
<td>2</td>
<td>These responses were generally supportive of the allocation of this site but wanted the issue of flooding and the requirement of a strategic boatyard to be specifically referenced.</td>
<td></td>
</tr>
<tr>
<td><strong>Gallions Lock / Albert Island SIL</strong></td>
<td>1</td>
<td>One response was received from a community group which was broadly supportive provided access to the waterfront was maintained. They also stated that there was an opportunity for jobs to be created on this site in relation to non-tidal water access.</td>
<td></td>
</tr>
<tr>
<td><strong>Coolfin North</strong></td>
<td>1</td>
<td>One response received from a Duty to Co-operate partner which was generally supportive but wanted to see issues related to flood risk being incorporated in the site requirements.</td>
<td></td>
</tr>
<tr>
<td><strong>Limmo</strong></td>
<td>2</td>
<td>Two responses were received in relation to this site. One was received from a developer which offered support for extending the boundary of the site to include Canning Town station. The other response came from a charity which wanted higher education uses to be included in the site description.</td>
<td></td>
</tr>
<tr>
<td><strong>Manor Park Road</strong></td>
<td>2</td>
<td>Two responses were received in relation to this site from developers/site owners. Both of the responses were</td>
<td></td>
</tr>
</tbody>
</table>
critical of the specification of a ‘central’ green space given the sites other constraints.

<table>
<thead>
<tr>
<th>Location</th>
<th>Response Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Parcelforce</td>
<td>3 responses were received in relation to this site, 2 from site owners and 1 from a developer. These were generally supportive but one respondent argued that the extension to this site should be given a separate strategic site allocation than the current site to allow them to be developed independently from one another.</td>
</tr>
<tr>
<td>Plaistow North</td>
<td>1 response was received from a site owner/developer in relation to this site. This stated that there was no intention to redevelop above the listed underground station within the timeframe of the plan due to the prohibitive cost.</td>
</tr>
<tr>
<td>Queens Market</td>
<td>1 response was received in relation to this site from a community group which objected to anything being carried out that would threaten the future of Queens Market and Hamara Ghar.</td>
</tr>
<tr>
<td>East Ham Northern Gateway</td>
<td>1 response was received from a site owner/developer in relation to this site. This stated that there was no intention to redevelop above the underground station within the timeframe of the plan due to the prohibitive cost.</td>
</tr>
<tr>
<td>Canning Road East</td>
<td>1 response was received which suggested that the Channelsea House site should be included within Strategic Site 510 (Abbey Mills).</td>
</tr>
<tr>
<td>Beckton Alps</td>
<td>1 response was received from a developer in relation to this site. They expressed the idea that to include Beckton Alps in an allocation alongside Alpine Way would be an under valuation of Beckton Alps which they feel could be a standalone site.</td>
</tr>
<tr>
<td>East Ham Gas works</td>
<td>1 developer suggested this as a site allocation.</td>
</tr>
<tr>
<td>Newham Sixth Form College</td>
<td>Newham Sixth Form College have proposed the allocation of the southern part of this site for housing.</td>
</tr>
<tr>
<td>Silvertown Arches</td>
<td>1 response was received in relation to this site from a site owner which was supportive of the allocation.</td>
</tr>
<tr>
<td>Bow County Court</td>
<td>The site owner objected to the allocation of this site for community facilities and wants it allocated as a housing site instead.</td>
</tr>
<tr>
<td>Lady Trower Playing Field</td>
<td>1 representor suggested this as an allocation</td>
</tr>
</tbody>
</table>

The Options Appraisal sets out how these responses have been taken into account and what changes have been made to the policies to be brought forward.
4 Summary

4.1 The above report demonstrates the extent of consultation and engagement across a broad range of topic and spatial areas. The Options Appraisal details how it has informed the plan revisions/policy re-drafting, and how the technical evidence base has addressed a number of outstanding issues raised in the formal consultations, such as questions of viability, need and demand. Inevitably there are some gaps in engagement, notably with the various infrastructure providers failing to come forward to discuss their plans (e.g. energy and telecoms companies). However, it is anticipated that having a draft revised plan should stimulate further engagement, and through this the policies, site allocations and IDP can be further refined, justified or explained as necessary.
Appendix 1    Consultation Publicity

Stakeholder Database Email:

![Stakeholder Database Email]

The Newham Mag:

The Newham Mag is published fortnightly and delivered free of charge to every home in Newham. Copies can also be found in key locations such as libraries, universities, colleges, schools, doctors’ surgeries, hospitals, charities, social care organisations, leisure centres, theatres, pubs, shopping centres, ExCel international exhibition and convention centre, Stratford regional and international stations, and London City airport.

- 76% of people who receive the Newham Mag directly say they read it
- 88% of readers say it is the best source of local information

Circulation figures include:

- 324,000 Newham residents and over 120,000 households
- Over 6,000 businesses
- 23,000 students at the University of East London, 20,000 students at Newham College and young people at 94 schools in the borough
- 12,500 Newham Council employees
- Annual visitors at the ExCel international exhibition and convention centre (3.6m), Newham leisure centres (1.25m), Newham libraries (1.4m) and London City Airport (4.3m)\(^1\).

Local Plan Review: Issues and Options

Newham’s Local Plan helps to shape the future of the borough and sets out our plans to make the best use of available space and opportunities, ensuring that the benefits of development are shared equally and respond to local needs. Whilst the current plan is working well and many parts will remain the same, to ensure that policies continue to be robust and up to date, we are carrying out a Local Plan review (LPR).

As part of this, we are currently consulting on an ‘Issues and Options’ document (reg 18 stage). The document responds to a number of current issues and addresses new opportunities via a set of potential policy options (Part 1) and new site allocations (Part 2). The document is accompanied by an Integrated Impact Assessment (IIA) and supported by a number of Evidence Base documents.

Comments on the two-part Issues and Options document and IIA are invited for a period of six weeks from Friday 24 February, with a deadline of Friday 7 April (midnight).

This consultation is your opportunity to comment on the issues and sites we have identified, and tell us whether the options we are proposing are appropriate and capture all opportunities to enhance the borough. Consultation questions can be found within the documents.

All representations should be made in writing by email to localplan@newham.gov.uk, should be clearly labelled ‘Local Plan Review’ and must make clear who the response is on behalf of (e.g. local resident, business, landowner etc.)

- LPR: Issues and Options Part 1 – Policies
- LPR: Issues and Options Part 2 – Sites
- LPR: Integrated Impact Assessment (I&O draft)
- Appendix to the IIA

Paper copies of the documents will be available to view at:

- East Ham Customer Service Centre, 326 Barking Road, E6 2RT – check for opening times
- by appointment only at Newham Dockside, 1000 Dockside Road, E16 2QU – call 0203 373 8300 between 9am and 12pm, Monday to Friday to arrange.

Documents can also be accessed electronically at all Newham libraries.