Local Plan Review
Proposed Submission Draft
Options Appraisals

November 2017
1. Introduction

The Options Appraisal document presents, in a concise and coherent format, the process by which the policy options, site allocations and designations scoped in the Local Plan Review Issues and Options document, were rationalised and refined into the draft policies presented in the Proposed Submission Draft Local Plan.

In doing so, Options Appraisals analyse the evidence base (both from engagement and technical studies) and ongoing IIA process which have informed the plan-making process, and explains how conclusions where reached over which policy options and proposed site allocations are appropriate to take forward.

All documents related to current and previous consultations can be found on Newham’s website www.newham.gov.uk/planningconsultations.
Spatial Policies

Recap of review aims

- Through updates and additions to the strategic framework and spatial policies, reflect the evolution of borough-wide, thematic and area-specific aspirations, recognising progress to date, changes in place character, new opportunities and challenges, and revised Pan-London policy and market contexts.
- Tie together and provide spatial coherence to spatial allocations and designations, proposed and existing.
- Ensure appropriate alignment/integration with spatial policies that have evolved in neighbouring Local Plans. Remove LLDC site and areas except in relation to ensuring cross-boundary integration and connectivity.

<table>
<thead>
<tr>
<th>Topic</th>
<th>Analysis of Evidence (technical / engagement / IIA)</th>
<th>Carry forward from I&amp;O:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do nothing more than we already do</td>
<td>Engagement to date has identified continued support from development industry, residents, members and partner organisations for the spatial strategy and associated allocations. However, not to update the plan would be to fail to account of progress to date and changing socio-economic and policy contexts, including new opportunities and threats. The Review also offers the opportunity to better clarify intentions on certain points, ensuring the spatial portrait, vision and objectives are embedded in policy and objectives re-focused on core concerns.</td>
<td>Do not carry forward option 1.</td>
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<tr>
<td>Update strategic principles: Good growth - balancing the need for homes, jobs, infrastructure etc; ensuring stable,</td>
<td>Development interests raised the issue of not enough ambition for the Local Plan Review to significantly increase housing delivery, particularly referring to the extent of SIL release in the Royal Docks, and the 'restrictiveness' of new proposed height schedule for strategic allocations. (also see Housing Growth section within HOMES OA and Supply of Employment Land section within Employment OA)</td>
<td>Carry forward Options 2, 3, 4, 5, and 6.a), b), c), and d), e) and 7.</td>
</tr>
</tbody>
</table>
mixed and balanced communities; resilience objectives

However, local residents and members are supportive of the principle of 'homes not at the expense of jobs', while businesses and property agents highlight a seriously stressed property market due to residential values, and the GLA evidence base and London Plan direction of travel makes it clear that employment land release for housing needs to be much more cautious than previously.

Residents and members have also shown concern that the benefits of development are not reaching existing communities and that infrastructure is not keeping pace with growth (also see Sites and Spatial Strategy & Managed Release and New Provision section within Social Infrastructure OA). There is a call for the Local Plan to be more supportive of bottom-up regeneration and for more to be done to ensure that local residents are involved early on in decisions that affect them.

The IIA has also stressed the importance of balancing housing growth demands with other needs (business floorspace, infrastructure, affordability, access to green space etc), and the application of good design principles and standards. It has also highlighted the scale of the opportunity, not just in terms of numeric outputs, but in the contribution that strategic development is expected to have on enhancing local character and promoting heritage and other assets.

LBN fully recognises and embraces its role in providing for local and strategic housing need planning for it proactively through the development plan and development management process, but in doing so is cognisant of the need to provide for 'good growth', where quality housing of the right mix is delivered alongside jobs and appropriate supporting infrastructure, in order to meet the needs of the population. Focusing development opportunities on delivery of housing above all else ignores many of the equally pressing issues of long term significance, including sufficient space for employment and business growth, placemaking of sustainable neighbourhoods, provision for transport,
community infrastructure and green space, and resource efficiency. It is not just a question of how much more housing infrastructure it can enable, but how much more infrastructure more housing requires, given already significant cumulative deficits and the need for the planning system to deliver mixed, balanced and resilient communities.

<table>
<thead>
<tr>
<th>Update strategic principles/spatial strategy: Coherence and Integration</th>
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<tr>
<td>Formal and informal engagement with local residents and elected members has highlighted a need for better integration of development into Newham’s existing fabric. Beyond building layouts and design, issues were raised relating to, for example, the opportunities for the activation of new green spaces, and to support the vitality and attractiveness of other parts of town centres. Engagement with Historic England has also highlighted a need for a more proactive approach to maximising the use of heritage assets and better assisting with integration of development into existing context more generally. Engagement with members has also considerations relating to how different parts of a centre integrate with each other: This is already detailed in relation to Stratford, East Beckton and East Ham town centres, but specifications for Forest Gate, Green St and Canning Town have been added.</td>
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<tr>
<td>The Character Study and the IIA have also highlighted the importance of comprehensive development through masterplanning, even if individual sections of the site are delivered to different timescales or as part of separate applications, in order to secure wider area benefits such as transition between uses, connectivity, permeability, higher quality public realm, and integration of old and new developments. While the principle of comprehensive development already forms part of the spatial policy, its application needs to be strengthened.</td>
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<tr>
<td>Where appropriate, site allocations, including indicative heights have been drafted to specify specific integration considerations therefore, as well as more clearly highlighting their particular strategic roles within the spatial strategy.</td>
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<td>Carry forward Option 6. b), c) and d).</td>
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See also Successful Places & Sites OAs.

| Update strategic principles: Sustainability – design, technology, and management techniques covering all stages of development | Currently the spatial strategy makes few nods to sustainability principles and related SC Policies. While SP and SC policies apply to any development nonetheless, there needs to be recognition that cumulatively developments can have an important spatial impact beyond site by site considerations, such as supporting wider modal shift, delivering and enhancing an interconnected network of ecosystems, promoting district/local energy production, supporting a circular economy, strengthening and enhancing the hierarchy of town centres, and other principles and practices with systemic impact. These are See also Sustainability, Climate Change & Associated Infrastructure (Green / Blue / Energy / Waste) OA. | Carry forward Options 6.d), g) and j). |
| Update spatial strategy: Total outputs | The outputs of the spatial strategy require updating to reflect recent evidence base and changes in policy approaches to homes and jobs, but also in light of strengthened strategic principles outlined in section 2 above, as well as emerging development opportunities. See also Housing OA and Employment OA. | Carry forward Options 2, 3, 4, 5,6b. |
| Update spatial strategy: Connectivity – bridges; cycling and walking improvements particularly along docks/rivers; DLR/Crossrail; new | Overall, connectivity is an essential spatial principle that applies to all developments as directed by SP policies and reflecting London Plan and NPPF principles. I&O consultation as well as other engagement with members (at Members working group) and local resident groups (Mayor’s Show 2017, informal engagement) have highlighted a need for a more connected network of green spaces, improved access to waterfronts in the Royal Docks, further cycling infrastructure improvements, and protection for public rights of way. | Carry forward Options 2, 3, 4, 5, and 6.f, g, h, i, k and l. |
The Character Study review has also identified extensive, persistent barriers to connectivity between Newham's neighbourhoods and beyond, largely due to historic patterns of development (strategic roads, railways, viaducts, cul-de-sacs, segregation of pedestrian routes), topography and distribution of land uses (large blocks in single use such as industrial sites, hospital).

A series of strategic interventions have been identified as having the potential to significantly improve physical connectivity issues within the borough, with development of strategic sites playing either a direct role in delivery, or providing an essential contribution towards their implementation. While some of these key interventions have been outlined in the Core Strategy Policies S2-6, the Character Study review (which also takes into account the changed land and development context) has identified additional opportunities. Further masterplanning and feasibility work undertaken since the first iteration of policy has also resulted in some changes or additional detail that the revised policy will reflect.

See also Transport OA

| Integrate Vision into Policies and Reduce Objectives | As part of strengthening the overall spatial strategy and its underpinning strategic framework, the decision has been taken to embed the revised vision for Newham into the spatial policies themselves, rather than having a standalone vision, making link between vision and implementation clearer, and the overall Local Plan document more concise. The introduction

Conversely, the objectives that formed part of the introduction to the spatial policies have been absorbed as strategic principles in the policies themselves, where they remained relevant. This has allowed a refocus of Local Plan objectives around four key overarching topics that represent wider corporate and sub-regional objectives: 1) Optimise development opportunities in ways that benefit new and existing communities, achieving convergence | Carry forward Options 6.c, d, e, f, g, h, and i, and 7. |
Policy Amendments - Options

1. Do nothing more than we already do S1-S6 and others as cross-referenced

2. Amend existing allocated site boundaries.

3. Amend existing site allocations specifications.

4. Introduce new strategic sites.

5. Introduce new non-strategic sites.

6. Spatial Policy Options
   Strategic principles
   a. Bring convergence, resilience and stable, ‘mixed and balanced communities’ and ‘homes not at the expense of jobs’ objectives into the policy criteria (rather than just the start of the policy S1).
   b. Update housing numbers and jobs targets (all spatial policies) and explain the strategic role of proposed and existing Strategic Sites and designations and specify how they should integrate with existing/remaining areas (e.g. the transition between S14 and the existing town centre focussed on Barking Road) (S1 and area policies).
   c. Refer explicitly to physical infrastructure requirements needed to be aligned with growth (as well as social and green infrastructure) (policy S1)

 Spatial strategy
 d. Clarify that the ‘major shift from traditional industrial activity’ will take place in a managed way, with continuing protection of locally-significant and London-wide significant industrial areas, and management of spatial transitions between contrasting uses (Policy S1 and area policies).
e. Support wharf consolidation and the reduced spatial impact of utilities including transport depots, ferry access, sewage works (Policy S1, and area policies – especially Beckton and the Royals).

f. Promote the delivery of new strategic connectivity routes through Stratford, (east-west south of the High Street) Canning Town, (east-west Custom House to Canning Town, Activity street and Residential street) the Royal Docks, (activating the North Woolwich Road between Tidal Basin roundabout and North Woolwich Roundabout, and longer term, Woolwich Manor way between North Woolwich and Albert Island) and Beckton and related to the Lea River Park/Lea Way highlighting the role of Key Corridors in each area (S1 and area policies).

g. Promote a significant modal shift towards active modes of travel and public transport, highlighting the particular opportunities in the Royals and Beckton and the importance of route/network node/connection frequency (200m/400m for walking/cycling respectively, 800m for nodal public transport access) and penetration into and connectivity across areas (S1 and area policies and site allocations) which can also serve as important local view corridors in terms of views of character assets including the Thames, Docks and other waterways and local landmarks (S1 and area policies).

h. Highlight the strategic open space role to be played by various Canning Town and Custom House and riverside Strategic Sites (in terms of the location, quantum, quality, accessibility and connectivity of open space provision) and the Lea River Park, and its components; specify bridges and other connecting infrastructure/routes (S1, S2, S3, S4 and site allocations).

i. Ensure all other ‘spatial designations’ in Appendix 1 of the Core Strategy are adequately reflected in the spatial policies where this continues to be appropriate (S1, area policies).

Strategic principles

j. Reinforce the need to integrate sustainable design, technologies and management techniques into every development at every scale, in line with SP and SC policies (S1).

k. Spatial strategy Otherwise reflect changes to thematic policies with spatial implications concerning the night-time, visitor and cultural economy; tall buildings, housing protection, flood resilient design, social infrastructure, and associated site allocations and designations (all spatial policies & site allocations).

l. Make appropriate reference to neighbouring Local Plan spatial policies (all spatial policies).

7. Review all other spatial policies to ensure that they are up-to-date, focussed, concise and comprehensive in light of the issues identified above.
# Successful Places

## Recap of Local Plan Review objectives:

1. Continue to emphasise high standards of place-making and urban design with particular reference to town centres and public health, ensuring all components are adequately specified and working in concert with spatial policies and associated site allocations.
2. Examine the appropriateness of the tall buildings policy, ensuring it is working with development realities but also to achieve the strategic intent of the policy and the wider spatial vision.
3. Review all other successful places policies to ensure that they are up-to-date, focussed, concise and comprehensive in light of the issues identified above.

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<tr>
<td>Do nothing more than we already do in policies SP1 to SP10 and others as cross-referenced.</td>
<td>Although Successful Places policies have recently been supplemented by the Detailed Sites and Policies Development Plan Document, and on the whole are performing well and continue to be supported by stakeholders (notably town centre quality and distinctiveness, design quality, regeneration initiatives, control of tall buildings and development of key corridors) gaps have nonetheless been identified which should be addressed in this review. Similarly, the review provides an opportunity to update, clarify and add to existing policies in line with broader evolutions in policy.</td>
<td>Maintain present policy thrusts but proceed with other alterations as discussed below.</td>
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<tr>
<td>Tall buildings definition</td>
<td>The current definition of a tall building in both the London Plan and the Local Plan as those that are noticeably taller than their immediate surroundings, and/or have a significant impact on the skyline is unsatisfactory for implementation as it brings uncertainty as to when the policy does and doesn't apply, which has been an issue for members and DM officers. A definition of 'six or more storeys’ removes this element of doubt, and allows a full consideration of character in all cases. Whilst the I&amp;O document suggested that there would be a taller height benchmark in the Arc of Opportunity, given that this encompasses some lower density areas, it is judged to be more appropriate and effective to have a singular definition.</td>
<td>Carry forward modified Option 2b - apply the policy to buildings of 6 or more storeys.</td>
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| Tall buildings strategic principles | Residents have expressed mixed views on tall buildings, supporting their role in meeting housing need, but recognising the need for them to be well located and well designed including consideration of microclimate, landscaping and safety. Some have a stated preference for mid-rise rather than high rise, recognising that mid-rise is more characteristic of the historic development is Newham. Some members have also questioned the suitability of tall buildings accommodating families, the quality of approvals, and concern that height benchmarks would be seen as minima not maxima. In contrast, representations from the development industry wished to see greater freedoms and to be allowed to pursue higher densities. 

Given the positive and negative aspects of tall buildings set out in the Character Study, and increased pressure to build to higher densities, revising the tall buildings policy to clarify the strategic intentions, including a measured support for increasing densities, and a clearer expectation to demonstrate the added value of taller elements, including design testing of other formats, will have a generally positive impact (including as assessed by the IIA) on key objectives, and successful place-making. Therefore the option as scoped should be broadly carried forward, with the idea that a ‘mid-rise preference’ be expressed in more implementable terms (i.e. given difficulties in defining mid-rise appropriately, and the fact that even mid-rise may not be appropriate in some places). |
| Carry forward intentions of Option 2a, clarifying expectations around design/options testing and demonstrating the ‘added value’ of tall buildings. |
| Tall buildings spatial strategy | There was broad support from residents, members and some other stakeholders for the spatial strategy as already set out in the policy and amendments set out in the I&O, including consequent indicative heights for strategic sites, notably prioritising highly accessible/town centre locations for tall buildings, especially in the Arc. There was also concern by some to protect views of St Pauls and the Thames. In contrast, several developers claimed there was a role for very tall towers in areas beyond Stratford and Canning Town centres (including the revised tall buildings area as scoped) and asserted the importance of the term 'landmark'. Many developers also questioned the existing matrix and proposed alternative of a matrix for sites |
| Carry forward Option 2c for changes to the local plan set out below. |
that aren’t Strategic Sites, and indicative heights for Strategic Sites, stating this pre-empts detailed design work and impedes flexibility to consider things on a case by case basis, and to reflect likely changes in PTALs arising from public transport investment.

A review of consents and discussion with DM and design officers and members suggest that this policy has been implemented with reasonable success since the adoption of the Local Plan in 2011, and much of the discussion/debate in relation to tall buildings’ spatial acceptability relates to differing interpretations of policy concepts, and the difficulty of relating the tall buildings matrix to every Strategic Site context. As such it is important to manage expectations of both members/residents/officers and developers. The options proposed do so by tightening the spatial strategy in light of a wider spatial strategy based on town centre and place hierarchy and character, in line with wider successful places policy, regional policy and national guidance from Historic England, meaning it will be more likely that the policy will be implemented as intended, and in line with the vision and objectives, with positive IIA impacts. Overall therefore, the proposed changes are considered to be justified to be carried forward into draft policies, (spatial strategy and design and technical considerations) with some clarifications (e.g. acknowledging PTAL can change over time).

Many of the responses referred to considerations relating to individual sites which are Strategic Sites. These are assessed as part of the building heights evidence base. As per the current matrix, this is indicative, allowing for further work to demonstrate justifiable variations from them. However, in assessing such heights, a broad brush assessment has been made of constraints, sensitivities and cumulative impact, which will be useful for developers, members and residents to refer to as a relevant benchmark.

| Tall buildings design testing | General support from respondents but with some arguments from developers that existing Tall Buildings policy already contains sufficient criteria. As stated in the IIA, this option will promote resource-efficient development, Carry forward Option 2d for changes to the local plan set out below. |
design and construction, successful neighbourhoods and good quality housing by strengthening existing policy, raising design standards and addressing threats and opportunities. This option is based on the latest guidance from Historic England advice note 4 ‘Tall Buildings’ which details design criteria to be addressed in a planning application. It also formalises current practice, and is supported by feedback from DM colleagues. Reflecting recent concern amongst residents and members arising from the Grenfell fire, a fire safety/evacuation criterion is added.

The options as scoped will be carried forward.

<table>
<thead>
<tr>
<th>Site allocations</th>
<th>These are assessed in the Spatial policy/site allocations options appraisal</th>
<th>Carry forward Option 3 below.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Clarifications &amp; other updates</td>
<td>Other policy amendments proposed or now drafted reflect input from development management colleagues and other technical consultees including transport and environmental health colleagues re implementation, ensuring requirements are as clear and up to date as possible, as well as ensuring SP policies remain in line with other policies in the plan. For instance, the policy position on access to nature is more sophisticated than simply promoting proximity to SINC, (which may in any cases in some cases affect the biodiversity value of such SINC due to disturbance entrained). The access to nature cumulative impact zone is therefore removed. Clarifications further speak to continuing residents’ concerns about safety and security and access to nature. An additional suggestion by elected members was that arts/cultural development could be more positively supported as part of place-making not just protected. This dimension could be added to policy SP5. Overall, the clarifications to Successful Places policies will have a generally positive impact (including as assessed by the IIA) in achieving a high quality and safe environment for Newham as a borough in which to live, work and</td>
<td>Carry forward Option 4 with addition of an arts development element to policy SP5.</td>
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stay and are carried forward.

1. Do nothing more than we already do in policies SP1 to SP10 and others as cross-referenced.

2. Amend the tall buildings policy to:

   a. State that whilst increasing densities in the right locations is generally encouraged, there is a preference for mid-rise densities rather than tall standalone towers, and that as per H1:6, densities should not inhibit the provision of suitable family accommodation.
   
   b. Clarify that buildings in Urban Newham will fall within the scope of this policy where they are of 6 storeys or above, and that in the Arc of Opportunity, where they are 12 storeys or above, but that in any case, all buildings will be required to demonstrate high quality design as per the other SP policies.
   
   c. Refine the spatial aspects -
      
      i. Direct the tallest buildings in the borough to a ‘Canning Town Central’ area close to the station (see map in Part 2 – refined to be the southern core of the expanded town centre and wider area beyond the station to the north and west, not simply the town centre as at present) as a secondary focus, as well as primarily, Stratford Metropolitan.
      
      ii. On locations that aren’t Arc Strategic Sites or Stratford Metropolitan/Canning Town Central, clarify that appropriateness will require robust demonstration of:
         
         – Alternative high density formats having been tested and justifiably discounted;
         
         – Good public transport access; and
         
         – Contribution to legibility, place-making (including sensitivity to the local and historic context and place hierarchy) and sustainable communities (notably the ability to achieve neighbourliness as defined in SP8);
         
         Noting that on Strategic Sites, a broad brush assessment of this type has been made and forms part of the site allocation.
      
      iii. Clarify that reference in the policy to ‘good public transport access’ is expected to be a Public Transport Accessibility Level (PTAL) rating of four or above for the part of the site that the tall building is proposed on.
      
      iv. Make reference to the placement of tall buildings so as to secure views through to the Thames, Lea and Roding and parks from public open space including Key Corridors.
      
      v. Alter the matrix ‘Indicative Appropriateness of tall buildings’ to cross reference more detailed site allocations.
in terms of indicative acceptable heights and the distribution of building height across the site.

d. **Clarify and reinforce the design testing to process to:**
   
   i. Require detailed designs to be submitted for all tall buildings proposed, and specify that the ability to demonstrate that design quality will be sustained through the execution or realisation of that design across all development phases will be a consideration so that this cannot be altered at a later stage (requiring design credibility, technically and financially, and continuity of the project architect).

   ii. Scrutiny of scale, ensuring that it is appropriate not only in terms of local and historic context and character, but also the degree of public transport accessibility, place hierarchy (distinguishing between town and local centres and their hinterlands, and reflecting the town centre hierarchy set out in INF5), and enclosure and integration objectives for Key Corridors and linear gateways.

   iii. Emphasise the role of masterplanning and Design Review as part of the demonstration and testing of design acceptability in relation to legibility and place-making; delete reference to the term ‘landmark sites’.

   iv. Emphasise the careful assessment of any cumulative impacts in relation to other existing tall buildings and concurrent proposals for tall buildings at adjoining and nearby sites with particular reference to impacts arising from creation of a cluster of tall buildings or an addition to an existing cluster.

   v. Include reference to scale, form and massing, proportion and silhouette, facing materials, detailed surface design, and relationship to other structures, impact on streetscape and near views, impact on cityscape and distant views, and impact on the skyline.

3. Support town centre place-quality through allocating new Strategic Sites at gateways in East Ham and East Beckton and being clearer about the opportunities at the Green Street (Queens Market) Strategic Site.

4. **Edit the Successful Places policies to:**

   a. Clarify :

      i. how excessive linear concentrations will be assessed, making it clear that no more than 2 specified uses in a row will be supported, with the expectation that between such clusters should be at least 2 units (in SP10 – now SP9);

      ii. that all scales and types of applications (including advertisements, telecoms, householders) are expected to pass design quality tests (SP3); and

      iii. that ‘Secure by Design’ considerations apply to individual buildings as well as the public realm (SP3).

      iv. That the reference to ‘realising’ design quality in SP3 will bring design credibility, (technical and financial) and provision for continuity of the project architect into the assessment remit.
vi. That SP8 embodies an ‘agent of change approach’ to noise and disturbance.

b. Add in reference to:

i. Town centre night-time economy opportunities (SP6);
ii. the importance of playspace as part of healthy neighbourhoods and public space for all (SP2, SP3);
iii. trees and woodland as natural assets with specific BS standards to refer to in assessing and managing development impacts (SP5, SP8);
iv. the need to avoid overbearing impact and overlooking of adjoining private amenity space (SP8);
v. Additional Key Corridors: Freemasons Road, Vicarage/Upton Lane; Balaam Street (SP7).

c. Otherwise ensure clarity, focus, conciseness and comprehensiveness in all policies.
## Jobs

### Recap of review aims

- Identify further employment land for release and clarify how this will occur, whilst continuing to provide a sufficient reservoir of sites and land to deliver jobs and business growth
- Clarify the opportunities for promoting and managing the cultural and night-time economy as a growth sector and broaden the ambition for the visitor economy
- More clearer recognition of the pre-eminence of the NCFE as a FE training and education provider meeting local needs enabling their ambition for the visitor economy
- Clarify procurement expectations in relation to development and set out the scale of ambition in terms of access to employment that developers are expected to support, subject to viability testing
- Make more explicit reference to high quality communications and energy infrastructure as key components in the creation of high quality business environments to support sustainable economic growth
- Otherwise clarify and update Jobs policies as necessary in light of the issues identified above and the over-arching strategic intentions of these policies.

### Analysis of Evidence (technical / engagement / IIA)

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<td>Do nothing more than what already do in policies J1-J4 and others as crossed-referenced</td>
<td>On the whole the policies are performing well to support economic growth across Newham, and are supported by stakeholders. However, it is considered appropriate to update policies to reflect current economic ambitions both at a local and strategic level, and overall to improve clarity of the policies. This includes combining policies J2 and J4 to more clearly set out the employment land managements strategy in one place.</td>
<td>Maintain present policy thrust but proceed with alterations as discussed below.</td>
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<td>Strengthen the policy to further promote employment across</td>
<td>These policy clauses receive general positive assessments in the IIA, given their scope to support economic growth, reduce poverty, and more broadly, support successful places and sustainable development, subject to</td>
<td>Carry forward Option 2 (including refinement of employment hubs</td>
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<tr>
<td>Urban Newham  (Culture/NTE, Tourism and Visitor Economy and Electronic Communications/Energy infrastructure)</td>
<td>management of cumulative impacts (as per existing policy).</td>
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<td><strong>Culture &amp; Night time economy</strong></td>
<td>London is recognised as an important on the global stage for culture and creativity, and as such the Mayor of London has highlighted culture as one of his key priorities, and sets out a commitment to ensure this remains the case, whilst ensuring more Londoners access arts and culture. Newham forms part of the proposal for investment to strengthen productivity, innovation and skill development as part of the Thames Gateway Production Corridor, (TGPC) and Stratford is identified as a night time economy hub. The TGPC Strategy identifies Royal Docks as part of the creative production area (creative manufacturing and production) in which support for these growth sectors is reflected in employment hubs.</td>
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<td>There was general support through engagement to further support employment across Newham particularly to better recognise the value of cultural, evening/night-time and the visitor economy as a key component of economic growth and town centre vitality and viability. This dovetails with a desire from residents to see a better local offer in these areas. Caveats to this support relate to concerns about cumulative impact and capacity to manage these in different scales of centres.</td>
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<tr>
<td>To fully maximise the economic opportunities in Newham, the policy therefore seeks to recognise the valuable contribution that cultural, evening/night and visitor economy has on London as benefits for both residents as visitors to Newham, explicitly directing NTE uses to town centres, (whilst accepting that in some cases they can be argued to relate to visitor economy employment hubs elsewhere) and cultural/creative sector uses to town centres and other employment hubs in the Thames Gateway Production corridor, plus acknowledging the potential/capacity of LMUAS and MBOAs and overlapping CFOAs. This reflects the evidence in the ELR of limited presence and immediate market appetite for these in boundaries to reflect employment growth sectors).</td>
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Newham to date, whilst recognising scope to change this. for these uses, particularly LMUAs close to town centres such as those in Forest Gate and Stratford. This reflects the risk otherwise of Newham being ‘leap frogged’ in preference for other boroughs that are more welcoming to such uses, and the limited presence and immediate market appetite for these uses in Newham, which would appear to require cultivation, drawing attention to the areas where premises attractive to such uses may be found (e.g. railway arches).

The options as scoped therefore have been incorporated into revised policy drafts, with appropriate cross referencing to the neighbourliness and cumulative impact policies (particularly in relation to managing night time uses and nightly stay hostels) and the agent of change principle discussed below.

2.c Tourism/Visitor Economy
The existing Local Plan currently directs tourism towards Stratford and the Royal Docks. There is however a drive to promote tourism (and associated accommodation needs) across the whole of London (not just central) in areas that are accessible by public transport, given its significant economic potential, which is supported by members and other stakeholders including the GLA. With improvements public transport, Newham has increasingly good public transport connectivity to central London attractions and accommodation, as well as its own attractions in the Royal Docks and Stratford, as well as Green Street. Moreover, further visitor attractions and accommodation can more broadly benefit town centres and local residents (as discussed above). The options to broaden the locations where hotel accommodation will be acceptable, (to all town centres proportionate to their role and function) and to clarify where within the Royal Docks visitor and hotel accommodation and facilities will be acceptable, recognising the existing broad reference to the Royal Docks is too vague (to ExCeL and London City Airport employment hubs, and other large scale sites with good
public transport access -i.e. Strategic Sites) will therefore be carried forward.

2.d Agent of Change
The ‘Agent of Change’ principle is generally discussed in relation to the NTE, but as per the existing neighbourliness policy, it is a principle that reflects the broader spatial approach in Newham. As such it makes sense to extend it to other forms of employment-generating uses. Support was highlighted for this approach by the GLA and also with Members in its scope to address concerns around potential noise impacts as an approach that strikes a balance between promoting economic growth (and the ongoing viable operation of the existing uses that support this) and securing a high quality mixed use borough.

2.e Digital Infrastructure/Energy Infrastructure
No representations received, however more general engagement with the industrial and logistics sector and the ELR has highlighted its importance and current deficiencies in industrial areas in London, causing real problems of functionality and operational continuity. In order for Newham to remain competitive and attract investment in a changing economy supporting knowledge, access to digital and energy infrastructure is essential as part of environments generally conducive to growth. This is reflected in specific reference in revised J1, together with the new utilities policy INF4.

5. Any other amendments
Refinement of employment hub boundaries
To support economic growth Employment Hubs have a role in creating high quality business environments, allowing for growth sectors to accommodate and develop their working environments. Following the review of employment land (see below) town centre visions and growth sector spatial
strategies discussed above, it makes sense to review employment hub sectoral specialisms/strengths, and their boundaries: acknowledging particular employment generating uses presently outside hubs or related to Strategic Site and vision aspirations in the Royal Docks, and including all town centres, and where relevant MBOAs, LILs and LMUAs in close proximity as employment hubs. To maximise the benefits of the J1 policy revisions therefore, these amendments are important.

<table>
<thead>
<tr>
<th>Supply of Employment Land</th>
<th><strong>Land Release Options</strong></th>
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<tr>
<td></td>
<td>Overall, reviewing employment land will have a generally positive impact (as assessed by the IIA) by updating and providing a more efficient use of employment land and a policy approach that seeks to mitigate any potential negative impacts.</td>
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<td></td>
<td>3.a Employment land release</td>
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<td>Representations received recognised the increasing demand to balance the delivery of both jobs and homes as part of the overall strategy for Newham. Generally there was support for [plan-led managed] release of SIL to deliver new homes and other mixed use, however this should not be at the expense of jobs and ensuring there is a sufficient supply of employment land to meet future economic demands at both a local and strategic level. Residential developers typically wanted to see further release than scoped however, particularly in the Royal Docks, pointing out significant levels of vacancy.</td>
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<td>Technical evidence and engagement with industrial operators suggests that industrial land release across London and in the more immediate area has been well above what regional policies have deemed appropriate to ensure economic needs are met due to increasing pressure from high value land uses such as housing, and displacement of uses, with no suitable premises for them to move it is an increasing issue, at worst resulting in Carry forward Option 3 (noting sites overview below including additional strategic site at Thameside West (Central Thameside West) strengthening the role of SIL at this location and industrial management criteria set out in policy).</td>
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businesses closing, and a best, in them moving out of the area taking with them jobs and investment and broader economic functionality (e.g. shorter delivery times/journeys). Furthermore industrial development remains viable in Newham and spatially Newham has the opportunity to grow as an industrial location due to it being the last inner London Borough that can service the centre. In relation to vacancy, work undertaken by the Council together with the GLA concludes that ‘surplus’ vacancy remains lower than reported due to projected demand, including the continued need for space extensive uses, development processes in train, inappropriate residential hope values, and the issue of displacement. Following engagement with the GLA reference to PILs and IBPs will be removed as not adding any value to SIL management in light of industrial demand; industrial and warehousing stock as newly built is often universally better in the environment created than older stock. For details on the additional employment strategic site in Thameside West see proposed strategic site allocations OA.

Broader engagement with industrial industry and employment land evidence base highlighted the requirement to meet demands on employment land in which an option to support Managed Intensification criteria to ensure employment land secures both maintained and increased capacity without implications on functionality and operation. The options to this approach alongside Managed Transition and Managed release will be essential to ensure the Borough carefully managed its remaining stock and opportunities are maximised to support the overarching objective to transition to a mixed use borough to its best effect.

This has resulted in the refinement of options and a focusing of new release at the western edge of Thameside East, Beckton Riverside, and the western and eastern edges of Thameside West, with clear indication of capacity to meet demand on Strategic Sites in SIL and LIL, including a new employment-only Strategic Site at Central Thameside West linked to wharf
consolidation and reactivation. In turn, specifications around the management of release and intensification (which is an increasingly popular policy concept to help address excessive release) are tightened/added, to ensure economic space needs are met in the round. Discussion on the land release on individual sites is set out in the site OA.

3.b/c./d

As part of continued provision of sites to enable the supply of a diverse range of workspaces and places, including space [and support] for small and medium businesses, to alleviate pressure on SILs/LILs and to provide locations potentially attractive to the cultural and creative sector, LMUAs perform an important role. This is reflected in a continued theme within engagement evidence which highlights the importance of small businesses to economic growth in Newham and in London. Indeed, the demand side ELR notes that business starts ups rates in Newham are higher than the London Average and Newham is an area where new businesses increasingly thrive (including micro and small businesses). Capacity to absorb those displaced from elsewhere is also an important opportunity. The principle of Local Mixed Use Areas (LMUAs) was established in the DSPDPD seeking to promote employment generating uses in a mixed use borough, whilst allowing for a managed transition to employment–led development more compatible with surrounding residential uses. Options as scoped identify further LMUAs from existing clusters of mixed use particularly those in close proximity to centres and key corridors, (which according to the ELR are more likely to be successful) to support Newham’s reservoir of employment sites, making logical amendments and additions to boundaries in some cases.

The following options were considered regarding LMUAs & LILs were considered, including further options suggested at I&O stage.

- Small scale changes have been made following evidence from the
employment land review to: Nursery Lane to better recognise the small cluster of light industrial units (currently within LIL 9); to Sprowston Mews recognising the potential for LMUA-type units at the rear of town centre commercial units on Romford Road and that this is more appropriate than inclusion in the town centre boundary, and following further consideration, the addition of Atherton Mews to this LMUA rather than creating a new LMUA given its close proximity (particularly to the town centre) and similarity; and to designate LMUA type uses within Beeby Road a LMUA, incorporating part of the Butchers Road LIL which better reflects LMUA characteristics.

- The LMUA potential identified by the ELR part 1 at Esk Road and Kudhail recognising good access and existing mixed use with the scope to incorporate/transition to residential has been carried forward.
- Bridge Road Depot (LIL 11) was identified by the ELR as a possible new LMUA given its residential and heritage context but also the continued need to buffer the railway, and the difficulty of securing new employment sites given buoyant Stratford residential values. Given the renewed possibility of depot consolidation at Folkestone Road, this is option is carried forward.
- An additional option proposed was to draw a portion of LMUA9 (Canning Road West) into S10 given a similar mixed use allocation and spatial contiguity. However, given the protracted enforcement case concerning the rest of S10, and the more pressing need for employment-led mixed use highlighted by the demand side ELR, this was not carried forward. However, as per the employment land review Part 1, options to extend the LMUA9 boundary to the southern end of LIL was carried forward to better secure employment generating uses with surrounding context.
- A LMUA extension was proposed by the GLA (Land and Property) at Silvertown Arches in Reg 18 reps. This has been taken forward recognising work to cultivate creative uses in this area, increasing
the usability of space beneath the road over a longer stretch.

- Reps at I&O stage also suggested including some land presently in LIL8 into LMUA 9. Given a Prior Approval for residential uses in the interim, it is now considered more appropriate to manage this site as part of LMUA designation to ensure if instead it is redeveloped, this occurs in an employment led way.
- It was also suggested by 1 represenator that LIL 5 should be considered for re-desingation as a LMUA particularly supporting B1a uses. However, LIL 5 has a key role in supporting transport operations and as such the present allocation as LIL remains appropriate to provide land for transport needs. Conversely, this designation does not preclude some ancilliary office space as part of these requirements.
- LMUA 12 (Bidder Street) has been drawn in to reflect changes to the boundary to account for the proposed strategic site at Canning Town Riverside (see proposed site allocation section of the OA)
- Part of Stephenson Street LIL, identified in the ELR as not materially different from the adjoining SIL, (and the improved vacancy rates) is added to the SIL as proposed at I&O stage.

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<thead>
<tr>
<th>Skills and Access to Employment</th>
<th>These policy clauses receive general positive assessments in the IIA, given their scope to reduce poverty and improve equality of opportunity, as well as mitigate various other changes.</th>
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<tr>
<td>5.b (employment for all)</td>
<td>The Council has a duty to promote health and well-being and ensure economic opportunities are improved for all of Newhams resident’s. The Joint Strategic Needs Assessment (JSNA) highlighted that across all types of mental health disorders, Newham has a higher prevelance compared to London and England, and members also note it as an important issue. Newham’s health and Well-Being Strategy notes that promoting employment contributes to improving people’s overall quality of life and helps people make positive life choices to improve</td>
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<td>Carry forward Option 4 &amp; 5b.</td>
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economic resilience, (as reflecting in SP2) therefore it is vital across the board, irrespective of health and disability status. This is specifically recognised in Workplace through the Supported Employment Team (SET) have a track record in supporting individuals who require targeted specialist employment support into employment, including those with mental health problems and other illnesses and disabilities generating specific barriers to work. As such it makes sense to clarify that tackling barriers to work will be a policy priority across all population subsets.

4.a.b.c.e Jobs targets
Promoting economic inclusion in pursuit of Convergence remains a key priority for the plan and and evidence and representations noted that unemployment remains higher than the London average and that lack of employment opportunities, in particular for amongst 17-24 age range remain a concern with residents. Likewise, ensuring new development benefits existing residents remains a commonly discussed issue. In order to strengthen policy reflecting this therefore, and enable developers to anticipate costs in site delivery, it makes sense to specific particular targets that the Council’s Economic Regeneration team work towards in partnership with developers, based on experience of presently informally negotiated figures and an associated tariff based on predicted job yield drawing on construction costs, employment density data and costs to place people per job via the Council’s job brokerage service, Workplace.

However, developer representations from both commercial and residential sector raised concerns over local employment targets (including operational lifetime requirements) highlighting that they should be sufficiently flexible to acknowledge viability and deliverability/relevance, including the circumstance that most construction occurs off-site and prefabricated units are assembled by specialist teams. In addition, viability evidence recommends the targets should but be applied more flexibly and as such
the policy as drafted includes the targets, an explanation of how they will be costed and caveats including viability to their application. As part of the implementation, partnership working with Council’s jobs brokerage Workplace who have a local track record of supporting local employment in Newham will be an important component of securing jobs targets created through development at both the development and post construction (end user) stage.

4.e (NCFE) The option to reference NCFE in policy as a major institution in Newham and East London (85% of students from Newham) helping to develop skills and with links to local employers as an exemplar of a locally embedded, growth sector relevant training provider was supported by members and Economic Regeneration colleagues. The policy as drafted brings in a clause added into the plan to the DSPDPD to J3, and adds specific reference to NCFE.

5.a (training facilities spatial strategy) Whilst no representations were received regarding the removal of the training facilities spatial strategy from policy J3, further consideration in discussion with DM colleagues has determined that it makes sense to align the policy with INF8, adding clauses to this which recognise that in some cases, training facilities may be an ancillary part of development on industrial land, while removing the previous reference to office conversion which is no longer common practice due to new PD rights. In elaborating and refining the clauses in the existing spatial strategy concerning the preference for facilities to be located in accessible locations, the policy further recognises representations and engagement evidence concerning particular transport/access issues in industrial areas and the barriers to work that can result. For instance, some employers across London have reported the difficulty of recruiting apprentices due to lack of affordable access to work (notably bus access).
Policy Amendments

2. Strengthen the policy to further promote employment across Urban Newham, responding to newer opportunities:
   
a. Recognising the value of culture as a key component of economic growth including night time uses, directing these uses
   (i) towards all town centres (reinforcing established cultural quarters where possible) in a scale proportionate to their
   function, in line with J1, INF5 and SP6, or
   (ii) other than smaller scale food and drink uses, to Stratford, East Ham, Green Street and Canning Town only.

b. Explicitly promote space for and support small scale cultural workspaces (such as publishing, tv/film production and artist
   studios) in LMUAs and MBOAs, certain strategic sites, and where appropriate, CFOAs,

c. Further promoting tourism and visitor economy facilities beyond the Royal Docks, (refined to refer to Strategic sites and the
   airport and ExCeL employment hubs) Stratford Metropolitan and Green Street to
   (i) in the case of hotels and visitor accommodation, other town centres on a scale proportionate to their function and
   character

 d. Recognise the ‘agent of change’ principle’ to support compatibility between existing and new uses.

 e. Make reference to and support the expansion of electronic communications networks and energy infrastructure.

3. Release further industrial land at Thameside East & West, Beckton Riverside, and on a minor scale at London Industrial
   Park and Cody Road using the existing managed release criteria set out in J2 and J4 coupled with spatial policies and site
   allocations which reflect evidence based on demand.

b. Allocate additional LMUAs.

c. Amend the boundary of Nursery Lane LMUA.

 d. Amend part of Stephenson Street LIL to fall within SIL instead
4. **Strengthen the policy to ensure access to employment is better secured through the planning process:**

   a. by specifying a uniform target (with associated financial contributions subject to viability testing) of at least 50% of new jobs created by a scheme to be occupied by Newham residents through appropriate funding for the Council's employment intermediary or successor bodies and other endeavors.
   
   b. as above, but specifying a lower target (35%) for construction phase jobs with at least 50% for post-construction, with more expected of expanding local businesses,
   
   c. by specifying that these targets and reporting against them would be expected over all phases of development and the operational lifetime of a scheme
   
   d. Specifying expectations of local procurement as per S1, In policy J3
   
   e. More explicitly supporting the preeminence of NCFE as a local vocational qualification provider, alongside reflecting their campus consolidation and enhancement plans.

5. **Other amendments as seen to be necessary to clarify and update the policies, including:**

   b. Clarify and strengthen J3.2 ensure that employability prospects of all should be improved, regardless of mental health and disability status.
Homes

Recap of review aims

- A continued supply of specialist and conventional, affordable and market housing, to meet identified needs in the most effective way.
- Clarification/refinement of policy that deals with the protection of housing, the prevention of family-sized dwellings conversion and HMOs.
- Acknowledge and manage the role of the growing purpose built Private Rented Sector (PRS) market in housing delivery.
- Revisit residential site allocations to reflect changes since the last Local Plan and to identify new sites with potential for residential development and associated indicative density and family housing typologies.
- Otherwise clarify and update policies as necessary in light of the issues identified above and the over-arching strategic intentions of these policies.

<table>
<thead>
<tr>
<th>Topic</th>
<th>Analysis of Evidence (technical / engagement / IIA)</th>
<th>Carry forward from I&amp;O:</th>
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<tbody>
<tr>
<td>Do nothing more than we</td>
<td>Housing policies of the Local Plan: Core Strategy have recently been supplemented by the Detailed Sites and Policies Development Plan Document (DSPDPD) and on the whole are performing well, receiving support from stakeholders in relation to improving housing quality (discussed further under that topic heading).</td>
<td>Maintain present policy but proceed with other alterations as discussed below.</td>
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<tr>
<td>already do in policies</td>
<td>Significant gaps have nevertheless been identified which should be addressed in this review. Similarly, the review provides an opportunity to update and add to existing policies, as necessary.</td>
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<td>H1 – H7 and others as</td>
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<td></td>
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<tr>
<td>cross-referenced.</td>
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<tr>
<td>Housing Delivery</td>
<td>Whilst Newham in recent years has delivered 1000s of new homes the borough has also seen significant population growth during that time. This trend is seen across London generally, where housing completions have not kept up with demand, resulting in a significant backlog in supply due to under delivery against housing targets.</td>
<td>See option 6, 7 and 8 below, plus new amendments as discussed.</td>
</tr>
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</table>
Largely consultation respondents at Issues and Options (I&O) stage (residents and representatives of the development industry) demonstrate support for the Council's ambitious housing growth agenda, albeit with a number of suggestions as to how policy should be refined (discussed below as part of individual topic analysis) to maximise and facilitate delivery, including through further evidence from viability work and the need to mitigate against delays in delivery through continuing to ensure policy is applied flexibly.

During consultation developers highlighted the need to for Objectively Assessed Housing need (OAN) and London Plan targets to be transcribed into the plan, along with a clearer and more definite ambition for delivery, prioritising housing over other types of land use. The current London Plan target for Newham, excluding the area that is within the LLDC boundary (which is now under a separate planning authority) is 19,945 between 2015 and 2025. As part of work conducted simultaneously for the GLA’s emerging SHLAA as well as LPR, extensive review of the borough’s deliverable land, including an evaluation of constraints, has been undertaken and demonstrates that large site capacities make it possible to meet and considerably exceed the current target. However, the new Local Plan period will run beyond that of the adopted London Plan (up to 2033), requiring consideration of the need arising from the plan’s later years as well as increasing demand. Acknowledging the need to address any undersupply in previous years, the borough’s OAN figure of 2590 homes a year between 2011 and 2033, the government’s draft (as yet untested) target of 38,400 between 2016 and 2026, as well as the draft (as yet untested) revised London Plan target of 38,500 units, the Council are proposing a new housing target of 43,000 homes between 2018 and 2033. This represents a 19% uplift on the current target (up to 2025) based on site capacities, together with a projected delivery figure (also capacity derived) up to 2033 plus an additional 19% (broadly aligned with the NPPF delivery buffer). Based on the spatial strategy, plan objectives and evidence about deliverability, this is considered an appropriate approach to housing delivery.

Whilst it is agreed that a new target (and subsequent growth figures within spatial policies) are required within the plan to reflect the Council’s ambitions, it is essential
that housing delivery remains in line with the strategic vision, whereby sustainable placemaking is ensured via housing delivery being accompanied by jobs and infrastructure growth (see Jobs OA for further discussion on industrial land release). Moreover, it is essential that the housing target and capacities identified in Newham’s Community Neighbourhood Areas, reflect the realities of delivery, especially in light of the government’s housing delivery test.

Finally, though the majority of housing delivery is planned from large scale strategic sites, there are sites within the borough that will become available over the plan period but are either currently not deliverable or are too small for allocation. In spite of this, their role in housing delivery is not to be underestimated and the option to include a policy reference to such windfall sites, to maximise delivery from all land sources, is being taken forward.

Overall, reviewing housing ambitions will have a generally positive impact (as assessed by the IIA) by bolstering the incentive to deliver a continued supply of a mix of homes to meet the needs of the population, promoting community resilience and allowing for the creation of environments where people choose to live, work and stay.

Family housing
Consultation has revealed both support for the prioritisation of family housing and an acknowledgement of its importance to the borough, together with criticism of the possibility of prioritising its delivery over affordable, particularly given unknown impacts on viability processes. The I&O stage also revealed developer criticism of the existing policy position of 39% family, questioning the evidence base behind the Council's position and expressing preference that a more flexible approach to policy be applied to aid decision making on a site by site basis.

The key evidence base for housing need within the borough, the SHMA (2016) indicates that 3 bed family housing need represents the borough’s greatest overall housing need (64%), as well as the largest need (in terms of unit size) within both the market and affordable housing sectors. It is acknowledged that flexibility within policy is important to facilitate delivery; this is already achieved through policy application surrounding unit mix being subject to viability. Moreover, there is no evidence to

See option 2a.iii, b, c. 4 a.i, b. c, plus new amendments as discussed.
suggest that the pursuit of the adopted family housing target, already far lower than the SHMA’s OAN figure, is placing undue constraints on development. This is further supported by recent viability work on the proposed and existing site allocations (see Local Plan and Community Infrastructure Levy Viability Assessment 2017).

Members have made clear the need for continued support for family homes (3 bed plus) particularly as larger units are harder to achieve as part of the mix within new builds. Acknowledging this reality and noting support expressed during consultation for the delivery of larger family homes, it is considered that the conversion of very large units to flats or maisonettes, provided that they yield 4 bedroom homes and can safeguard an adequate amount of amenity space, is an appropriate intervention to address 4 bed housing need (approximately 30 units per year) identified by the SHMA, which would otherwise go unmet. This option is preferred above protecting all very large units from conversion, or allowing conversion in favour of delivering a 5 bed unit as part of mix, as opportunities do exist to make better use of very large homes to suit Newham’s contemporary needs and the need for 5 bedroom market housing has not been demonstrated by the SHMA.

Whilst the need to deliver and protect family homes is apparent, this has to be balanced against the need to substantially increase housing supply, and to take advantage of development opportunities as they arise. As the majority of 3 bed housing is achieved through the build out of schemes of ten units or above, given the complexity of applying such a percentage to very small sites, and as no significant response in relation to this point was received during consultation, it is deemed appropriate to amend family housing policy to only apply to proposals of ten units of above – in turn aligning it with the affordable housing threshold that is also subject to viability testing as part of the application process. Opportunities also exist to clarify certain policy points surrounding family housing. First, the removal of the varying levels (high/ medium/ low) of family housing from policy and strategic sites will reinforce the need for all sites to contribute towards the 39% 3 bed target, regardless of location.
Lastly, it is acknowledged that in some unique circumstances (where housing may have suffered from historic quality issues and where intensification is appropriate), subdivision/conversion can have multiple benefits or more desirable outcomes than the status quo. For this reason where properties exist in busy locations, above active commercial units, with no outdoor amenity spaces and poor entrances, policy is introduced that would allow subdivision/conversion, in turn helping to uplift often underutilised or substandard accommodation.

Some of the borough’s landlords have expressed concern that the Council’s position on family housing restricts HMOs/rental to unrelated individuals, leaving housing unlettable due to lack of affordability for families, in turn exacerbating the housing crisis for shared households. In Newham, where churn remains a key matter to be addressed, unfettered HMO policy has the potential to continue to eat away at family housing as occurred prior to the Local Plan: Core Strategy’s adoption. Moreover, there is a lack of evidence to support vacancy assertions and in fact data suggests that vacant lettable properties have decreased in the since the Core Strategy’s implementation. In light of this, as well as continuing to protect family housing from conversion in all circumstances, it is considered appropriate to explicitly support within policy the de-conversion of HMOs to family homes.

Although the significant need for family housing remains, the requirement for affordable homes has not decreased (see Affordable Housing and Viability section) and no evidence or opinions put forward during engagement provides any solid reason as to why policy should deviate from its prioritisation of both, considering balance between the two on a case by case basis and keeping the policy flexibility as it currently stands as per the outcomes of viability testing.

Overall, options to edit policy as discussed, respond directly to IIA objectives of promoting housing choice, attempting to ensure that people have access to varied, good quality accommodation that meets need.

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1 DCLG (2017) LAHS online.
| Affordable housing and Viability | Public engagement has made clear that concerns remain over high property prices, the lack of modern affordable housing within the borough, revealing support for the proposed affordable housing floor, on site affordable housing provision and social rented properties in particular, and highlighting public opinion that opportunities exist to add to existing poor quality and old stock.  

Whilst the I&O revealed acknowledgement from the development industry of the importance of affordable housing, options to prioritise its delivery over family units (rather than address on a case by case basis) as well as the introduction of an affordable housing floor, were met with criticism in light of no published viability work and potential unknown impacts on delivery, particularly where sites are heavily contaminated or if the strict application of policy should occur. One respondent however did express a preference for an area based affordable housing floor where viability would support it and a number of submissions called for alignment with the Mayor's Affordable Housing and Viability SPG, particularly in relation to measuring affordable housing on a habitable room, rather than a unit, basis.  

The SHMA (2016) is clear about the considerable affordable need within the borough, the delivery of which would make a substantial contribution to IIA objectives in terms of delivering quality and choice in housing options, and the GLA are generally supportive of the Council’s proposed approach. Flexibility is already, and will continue to be maintained by affordable housing policy (requiring 35 – 50% units as affordable) remaining subject to viability, and in light of viability testing which does not support an affordable housing floor even when growth scenarios are applied, this option will not be carried forward into policy. Aside from taking the opportunity to clarify the Council’s existing approach to viability appraisal, as well as the factoring in of PRS, affordable housing policy is not subject to extensive change.  

Affordable housing thresholds remain largely in conformity with the London Plan, however the Council will however continue to seek affordable housing on a unit rather than a habitable room basis; it is important to be mindful of the Mayor’s SPG as a document that serves wider London, and does not account for local policy context. In | See Option 3b, c below, plus new amendments as discussed. |
Newham, where a significant proportion of all new homes are sought as 3 bedroom—delivering more rooms per unit—seeking housing on a habitable room basis could result in less affordable provision comparably. For example, in a scheme of 10 units delivering a policy compliant level of family homes, the total habitable rooms is 31. In a borough without the family housing requirement, habitable rooms are likely to be higher. Assuming a 50% affordable provision, 5 units would be required to reach the maximum affordable threshold. If however 50% affordable provision was sought on a habitable room’s basis, only 16 rooms would be required to be affordable. Assuming that larger 3 bed units are the affordable offer, this equates to 4 affordable units, less than could have been achieved if seeking affordable provision on a unit basis. When considering the significant cumulative impact that this would have on affordable housing delivery within the borough, a unit basis remains the most appropriate approach in Newham.

A response from the development industry also drew attention to the impact of review mechanisms and the potential risk that these pose to investors, expressing the importance of early specified milestones for review, the need for them to be undertaken in a manner than reveals full risk to funders and applicants (i.e. taking full account of cost increases and being capped at policy compliant levels of affordable housing) and expressing a preference for the Council’s position to be clarified through an SPD (rather than Local Plan policy). This however already aligns with our general approach to review, a process which is determined on the particulars and the merits of the scheme and designed to incentivise delivery, mitigating risks for the developer and sharing secured benefits across all parties, in accordance with the NPPF/NPPG. Consequently, setting out such processes within policy or an SPD, is not currently considered to provide any added value beyond the guidance at national level.

In terms of proposed changes to intermediate housing policy, introducing a specific threshold for intermediate home ownership products was resisted by a respondent from the development industry on the grounds of delivery impacts and its potential to restrict variations in tenure products. The 40% intermediate tenure requirement
(supported by viability) is already established within policy; intermediate homes are generally home ownership products, and no evidence has been presented to suggest that the introduction of a minimum threshold would have any impact, especially in light of an existing (higher) 40% requirement. On the contrary, viability evidence confirms that even when applied to site’s where policy compliant levels of affordable housing cannot be achieved; the requirement would not in itself halt delivery. Instead introducing this threshold would provide a platform for emerging intermediate products whilst safeguarding the delivery of those that result in home ownership, and update policy in accordance with the direction of travel of the NPPF, as set out in the Government’s Housing White Paper. Should any site specific complexities impact upon mix within a scheme, as discussed previously, the inherent flexibility of policy would assist in the decision making process. As these options do not materially change policy, no negative IIA impacts are anticipated.

<table>
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<tr>
<th>PRS</th>
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<td>Private Rented Sector (PRS) products delivering ‘Build to Rent’ units (as defined by the Mayor’s Affordable Housing and Viability SPG) continue to grow in importance within the housing market, with providers establishing their place as major housebuilders producing low risk, consistent outputs. Recognising that PRS can meet the needs of those who cannot afford or do not wish to buy homes, the London Borough of Newham seeks to facilitate this market, however in doing so it is essential that policy priorities of family and affordable housing are not prejudiced.</td>
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</table>

Members acknowledge that a broader rental market provides greater choice for residents and can create more vibrant and active areas in accordance with IIA objectives surrounding housing choice, successful neighbourhoods and good design. Concurrently, the introduction of PRS specific policy has received support at Issues and Options stage, albeit with a small number of developers concerned over the potential for prioritisation over conventional supply; the need for dual viability statements; the control of tenancy lengths by the planning system; and a lack of flexibility in relation to family housing requirements and design guidance. A preference for consistency with the Mayor’s SPG was also expressed, as was a criticism that PRS accommodation ‘should’ come forward as part of a broader site housing mix. |
First, the option that stipulates where PRS units are proposed they ‘should’ come forward as part of a broader site housing mix, is designed to facilitate delivery as part of wider development of large scale strategic sites (i.e. not as a singular product) rather that act as PRS policy requirement, similar to stipulations for family or affordable housing. Second, the Council is clear that in order to meet housing needs, a varied mix of quality tenures, types and sizes are required. The plan already contains policy to manage and facilitate delivery, ensuring that one type of housing does not impede the delivery of another and that quality standards are maintained, in spite of accommodation type. In terms of consistency with the Mayor’s SPG LBN recognise the distinct economics of Built to Rent homes and seek to ensure that this product can be adequately viability assessed. To allow this, applications should be accompanied by viability appraisals incorporating sensitivity testing that demonstrates the different outcomes of delivering a proportion of the site as PRS vs. delivering more market sale units as set out in the PAR, reflecting the choice to deliver PRS, though flexibility will be maintained by the existing policy. Finally, the technical criteria included within policy accords with the Mayor's SPG and is designed to ensure that where PRS is delivered, it offers quality, long term, fit for purpose housing options that benefit Newham’s residents.

For these reasons, and given the clearly positive impacts that facilitating a varied housing mix would have II A objectives, through delivering more housing choice, options identified for PRS are to be taken forward.

| Housing Quality and Specialist Accommodation | Two overriding concerns of the Council include redressing the imbalanced housing supply and improving housing quality, in order to stabilise the existing community, and to build mixed, balanced and sustainable places. In helping to achieve this, specialist accommodation policy written into the DSPDPD focussed on need, locational preference, and quality of such accommodation and so it is unsurprising given the DPD’s recent adoption that specialist housing has received little attention throughout engagement processes. |
| See option 4d, and 8 below, plus new amendments as discussed. | No objections were received in relation to the option to set out the difference between |
housing and quality hostels within the plan, a clarification point that does not have an impact on IIA objectives. Subsequently, this option will be taken forward. The only other direct comment received in relation to specialist accommodation was from a stakeholder suggesting that specific reference be made within policy to houseboats. As any relevant applications would be assessed against existing policy H3, designed to provide the framework for decisions taking in relation to non-conventional homes, this is not considered to add value to the existing framework. That said, this has been picked up within policy relating to infrastructure (the Blue Ribbon Network) and is discussed in the Sustainability and Climate Change Options Appraisal.

Housing quality is fundamental to the vision of creating stable, mixed and balanced communities and residents’ surveys reveal that satisfaction levels with the quality of accommodation are relatively high within the borough. Although this reduces for those housed in rented accommodation, this is a positive step towards achieving stability within the population, however residents remain concerned about overcrowding and poor quality stock, particular in relation to HMOs; whilst Members remain concerned about poor quality accommodation in terms of the specialist offer.

In light of this and positive conclusions highlighted by various IIA's throughout the Local Plan’s development, it is essential that the policy position on housing quality be maintained by the Local Plan, particularly to allow more recent policies concerned with specialist housing set out in the DSPDPD, the opportunity to bed down. That said, opportunities exist to improve the policy framework, combining and streamlining the policies of the Core Strategy and DSPDPD into one specialist housing policy and closing any gaps in the policies’ scope, including revisiting the quality standards of H6 (now absorbed into H3) to remove any mention of defunct standards. For completeness, this has also included making specific reference to the need for adequate external private amenity space to be considered.

New information has also come to light from engagement with other commissioning arms of the Council, in relation to wheelchair accessible and temporary accommodation that requires a policy intervention. The requirement that homes meet
the Part M4 building requirements for accessible, adaptable and wheelchair user dwellings (that replaces the now defunct Lifetime Homes standard) was already incorporated into policy SC5 of the DSPDPD. This criteria has been relocated to update draft housing policy (H1), a more logical location for it within the plan. Whilst the requirement for Part M4 applies to all tenures, part M4 (3) of the Building Regulations regarding ‘wheelchair user dwellings’ distinguishes between ‘wheelchair accessible’ (a home readily useable by a wheelchair user at the point of completion) and ‘wheelchair adaptable’ (a home that can be easily adapted to meet the needs of a household including wheelchair users). Planning Practice Guidance states that Local Plan policies for wheelchair accessible homes (i.e. adapted) should only be applied to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling, therefore the need for this type of accommodation (i.e. the need within affordable housing) should be assessed. Between June 2013 and September 2017, the demand for wheelchair adapted housing fluctuated between 96 and 64 homes, however only around 25% of those in need were actually housed. Whilst a greater quantity of Part M4 (3) units were delivered during this time there issues with delivery in its current form. Units have not necessarily been directed towards local need in terms of size and tenure, resulting in delivery of smaller units when the largest area of demand (including for those considered to be emergency priority) is more recently for 3 and 4 bed homes. This does little to decrease waiting times which are remain between 2 and 2.5 years for larger units for already adapted homes. As such, is it essential that units are directed towards local need in terms of size, tenure and level of adaptation, something which can only be determined at the earliest possible stage of the planning process, through engagement with the relevant LBN service areas. Policy has therefore been updated to address this issue.

In terms of nightly stay hostels, policy was initially introduced to the DSPDPD that directed this accommodation type to key corridors within 800m of a town centre, firstly to account for the fact that housing a number of persons of a similar demographic (in terms of factors such as age or specific vulnerabilities) risks having a detrimental impact on residential areas, and secondly to ensure that users have
access to adequate services and facilities. Engagement with other areas of the Council has highlighted the extensive use of nightly stay hostels to support the increasing demand for temporary accommodation, largely from families that register as homeless, that when housed together do not result in reduced amenity of surrounding residences. In light of this, the decision has been taken to require that only large scale nightly stay hotels be subject to locational criteria, and to provide further policy support for the growing need for temporary accommodation, strategic policy has been introduced that endorses modular housing as a meanwhile use, where it will be used for temporary accommodation.

Finally, suggestions from Members have also expressed the need to ensure that considerations are made in regards to older persons housing. Mindful of the varied forms that older persons’ housing takes, some of which blur the lines between use classes due to the provision of extra care offered, the existing DSPDPD sets out a need for older persons housing (not in C2 use) to form part of the mix on strategic sites, whilst that within C2 use is to be protected from conversion via a series of policy tests that require for any loss to be justified. Is essential that such policy be maintained to provide the opportunity for it to bed down. Its retention is also justified by the SHMA (2016) which provides a housing LIN needs figure broadly aligned with the current London Plan benchmark.

| Strategic Housing and Non-strategic Residential Sites | Due to the need to increase housing supply (see Housing Delivery section above) and the new housing target to set within the plan, it is necessary to review and update all sites that are identified for housing and mixed use development during the plan period, insuring that they are fit for purpose and highlighting any changes in the development context that should be included within their allocation. In addition, to taking advantage of development opportunities, a new set of large scale strategic sites for mixed use development are identified to deliver significant housing numbers, whilst smaller scale non-strategic residential sites, carried through from DSPDPD have also seen some additions (where demonstrated to be deliverable) to boost supply. For further discussion on individual strategic sites see the Proposed and Existing Strategic Sites Options Appraisals. | See option 7 below. |
In relation to non-strategic residential sites, four sites (Canning Town area 5 and area 18, and Pier Road Crossrail works site and 2 Pier Road) have been removed as they now fall within new proposed strategic site allocations (North Woolwich Gateway and Coolfin North). A fifth site, London Road Car Park is removed as it now falls within the expanded boundary of strategic site S29.

Five additional sites, Abbey House, 15-21 Leytonstone Road, Balaam Street Garage, Balaam Leisure Centre and Hartington Close/ Vandome Road, are allocated for their ability to provide housing supply during the plan period. Abbey House was the only site to receive a representation (demonstrating support from a land owner) in response to the proposed allocation at I&O stage. Of the sites tested, viability could be demonstrated in all cases, and the IIA largely indicates positive impacts in relation to the plan’s objectives. Other sites proposed for housing and not taken forward, are largely a result of their allocation as LMUAs (discussed within the Jobs section of the OA).

<table>
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<tr>
<th>Policy Amendments</th>
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<tr>
<td>2. <strong>Reinforce policy that will ensure a continued supply of housing to meet local need, by:</strong></td>
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<td>a. Where viability necessitates:</td>
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<tr>
<td>i.</td>
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<tr>
<td>ii.</td>
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<tr>
<td>iii. continuing to prioritise the delivery of both family and affordable housing, reviewing the balance between the two on a case-by-case basis.</td>
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<td>b. Requiring 39% 3 bedroom units (only) on schemes above 10 units.</td>
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<td>c. Removing the high/low/medium family provision descriptions from housing typologies described in policy and associated Strategic Sites.</td>
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<tr>
<td>d. Clarify the mix and balance other than family housing point, and the need to stabilise communities.</td>
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<tr>
<td>3. <strong>Refine the affordable housing policy to:</strong></td>
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a. Retaining the existing policy position of targeting 35 – 50% affordable housing subject to mix and tenure considerations, but:
   i. Introducing a minimum requirement (likely to be around 25% depending on the outcome of Local Plan viability assessment) across the borough; or
   ii. Introducing a minimum requirement in certain areas of the borough (likely to be around 25% depending on the outcome of Local Plan viability assessment).
   iii. Introducing a minimum requirement that varies across the borough according to viability testing.
   iv. Introduce these requirements upon plan adoption, or incrementally during a transition period.

b. Ensure that intermediate housing products including London Living Rent housing, are adequately described and promoted within policy, as part of delivering a range of products capable of fulfilling intermediate affordable housing need.

c. Ensure that sites deliver at least 10% intermediate home ownership products.

4. Clarifying and refining the policy concerning the protection and management of existing stock by:
   a. i. Allowing subdivision/conversion of large units provided that the resulting new homes are all 4 bedroom plus units in C3 use, and at least 45 sqm of private amenity space that is also at least 4m in width, is provided; or
   b. Support the de-conversion of HMOs to family dwelling houses.
   c. Reinforce the need for the protection of 3 bedroom family homes from further loss via conversion or subdivision in all circumstances.
   d. Defining what is meant by the terms ‘housing’ and ‘quality hostels’.

5. Introduce policy that specifically relates to purpose built PRS housing and stipulates that:
   a. Purpose-built PRS for single household or HMO occupation will be acceptable as part of the housing mix on Strategic Sites as well as the locations identified in policy H7.
   b. Purpose built PRS provision should come forward as part of a broader site housing mix, where onsite Family and Affordable Housing provision remain a priority, however:
      i. offsite family and affordable provision may be acceptable where onsite is demonstrated to be undeliverable, and where it is agreed that such affordable and family units will be delivered before or in line with the PRS housing;
      ii. offsite contributions may be acceptable where onsite or offsite provision is proven to be unfeasible, provided that these are proportionate and financially neutral; and dual viability submissions will be necessary, incorporating both the built for rent and build for sale financial appraisal.
c. Dual viability submissions will be necessary, incorporating both the built for rent and build for sale financial appraisal.

6. Introduce policy criteria that, specifically supports housing delivery from the development of small scale ‘windfall’ sites, not already allocated by the Development Plan, cross-referencing other policies as necessary.

7. Review and update residential (strategic and non-strategic) site allocations and identify any new sites deliverable for residential development.

8. Otherwise clarify and update policies as necessary in light of the issues identified above and the over-arching strategic intentions of these policies.
Sustainability, Climate Change & Associated Infrastructure (Green / Blue / Energy / Waste)

For full details of the options proposed under this heading, please refer to the third box below.

Recap of review aims:

- Increase the visibility of air quality issues / requirements.
- Reinforce the fact that sustainable design practices are expected, vital, and in certain aspects non-negotiable; with all forms and scales of development contributing to improved sustainability standards and lower maintenance costs by making better use of technologies and other opportunities.
- Incorporate recommendations of the updated SFRA and encourage more innovative design responses to flood risk.
- Ensure all appropriate green infrastructure is protected and establish standardisation in the way biodiversity value is assessed.
- Clarify support for energy and telecoms infrastructure where there is identified shortfall. Be clear that decentralised energy (district heat networks) should be prioritised.
- Ensure that cross-cutting policies are not creating overlap that causes confusion, generally review policies to ensure they are up-to-date, focussed, concise and comprehensive in light of the issues identified.

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<tr>
<th>Topic</th>
<th>Analysis of Evidence (technical / engagement / IIA)</th>
<th>Carry forward from I&amp;O:</th>
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<td>Do nothing</td>
<td>No specific comments were received in relation to the do-no-more approach, although various aspects of existing policies were supported (zero carbon targets for example, and promotion of the Lea River Park) and it is not proposed to lose these. However, for the reasons set out in the Issues &amp; Options document, discussions below, evidence base, IIA and ensuing policies themselves (specifically the reasoned justifications), the do nothing option will not be taken forward.</td>
<td>No.</td>
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<td>BREEAM and zero carbon requirements</td>
<td>Developers supported the re-testing of BREEAM requirements in relation to development viability; this has been done through the Viability Report prepared to accompany the plan which has confirmed that the cost of is meeting BREEAM excellent is negligible, and can readily be absorbed by development in the borough. As such Carry forward Option 2 (into SC1 and SC2).</td>
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caveats relating to viability are removed.

Whilst some objections were received from developers in regard to pursuing the zero carbon targets of the London Plan, it is noted that the provisions of the 2015 Deregulation Act which set out to delete the provisions of the 2008 Planning and Energy Act that allowed LPAs to set their own energy targets have not been enacted yet. It was also confirmed by Lord Bourne of Aberystwyth on 6th February 2017 (during House of Lords discussion of the Neighbourhood Planning Bill) that Local Authorities can still set higher energy performance standards for homes than those prescribed nationally\(^1\). The London Plan team have also confirmed their intentions to maintain zero carbon targets for residential and non-residential uses in the new plan; these requirements will be tested via London Plan examination.

Resident support was expressed for 'energy neutral' development. While this could mean one of a few different things in planning terms (carbon neutral vs energy self-sufficiency for example), given the relatively low levels of resident participation in formal consultations this support is significant. It indicates that residents care about an issue typically seen as environmental and understand the immediate/local and long-term/global implications of energy inefficiency. The support serves to confirm our approach of requiring all scales and types of development to deliver buildings that are as energy-efficient as possible within the context of national legislation.

Zero carbon targets and the promotion of clean, efficient energy have direct positive impacts on numerous IIA objectives, including in relation to health (improving air quality), economic security, improved resource efficiency, and the protection of habitats (global warming harms biodiversity through increased temperatures and decreased water supply).

\(^1\) House of Lords Hansard, Neighbourhood Planning Bill, 06 February 2017, Volume 778 – see entry time-stamped 7.30pm
| Flooding & Drainage | As SUDS policy was recently updated via the DSPDPD, the I&O made no specific suggestions re drainage. Options related to flood risk covered incorporation of SFRA recommendations; the maintenance and improvement of flood defences; and design expectations for schemes in high risk areas. Unsurprisingly, most related comments came from the Environment Agency, with some support and clarification from developers. Thames Water made representations relevant to the ongoing capacity of sewerage infrastructure. Developer support for clarity over FZ2 and 3 design expectations was expressed, with the caveat that the approach must be flexible in order to facilitate the highest quality design responses. Most Local Plan policies are drafted in an inherently flexible manner where possible and appropriate (i.e. in instances where relevant benchmarks / targets do not exist) – the wording of the policy can be reviewed via reg.19 consultation. The EA gave reminders that any requirements re flood resilient design in high risk areas should be secondary to the sequential test approach of ‘in Flood Zone 1 unless unavoidable’. This will be maintained and made clear in policies as drafted. Environment Agency representations regarding acceptable mitigation within flood risk zones have been addressed through inclusion of SFRA recommendations. The EA clarified that the buffered space expected alongside river edges for access to and maintenance of flood defences is 16m for tidal rivers (the Thames) and 8m for other main rivers (the Lea and Roding), this will be clarified in the Blue Ribbon Network and Flood Risk policies. Representations regarding the insufficiency of ‘in principle’ support for flood defence upgrades have been resolved through further duty-to-cooperate work, expectations are made clearer in revised policy SC3. Given the positive impacts in relation to IIA objectives including successful neighbourhoods, access to high quality homes, sustainable economic growth, water quality, and minimising flood risk itself, all options proposed will be taken forward. | Carry forward the following policies; 3a 3c (ensure wording is not unduly inflexible) Maintain (already in SC3) Now in SC3 (part 3b) 3b New amendments as discussed. |
| Energy (4,5,6,7) | Options related to the sufficiency of energy infrastructure, use of water source heat | |
pumps, expansion of heat networks, and renewable energy monitoring apparatus were set out in the I&O consultation document.

No relevant comments were received in relation to clarifying that all proposals should demonstrate that sufficient energy (and telecoms) infrastructure capacity exists to service the development proposed. Given known issues (energy supply in the Royal Docks for example) and the levels of growth expected, the option will be taken forward into a ‘Utilities Infrastructure’ policy designed to ensure sustainable levels of infrastructure for those elements not already covered elsewhere in the Local Plan (transport, community facilities, green infrastructure for example all have dedicated policies).

With regard to promoting the use of water source heat pumps, the Port of London Authority (PLA) were supportive but noted the need for their permission for any apparatus installed in the Thames. The policy will be drafted in liaison with the PLA so that it follows their existing guidance and signposts relevant requirements. Though not specifically referred to in the I&O, the Environment Agency advised that any ground source heat pumps should follow their good practice guidance. With that in mind, the policy will be drafted to coherently encourage use of all heat pumps that make use of sustainable/waste sources (ground, air, water, or secondary heat from other uses) as most appropriate, whilst highlighting the significant resource of the rivers and docks. Given the need for energy strategies to be tailored to the realities of each site and development, the Local Plan would not seek to prescribe the use of specific technologies; rather the support for heat pumps will be within the context of other energy related requirements such as prioritising use of heat networks.

In relation to proposals to specify the radius within which developments must connect immediately to known or expected heat networks, developers were clear that the approach did not account for site specifics and would likely be undeliverable. Advice from the GLA indicated that a better approach would be to establish a clear prioritisation of heat networks within energy strategies, so that their use has to be discounted before other technologies are considered. While one resident’s group suggested the use of the

| 4 (into INF4) |
| 5 (into INF4 and SC2) |

`modified version of 6`
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<td>7</td>
<td>Tate &amp; Lyle factory as a heat network source, such a solution would need the backing (i.e. be proposed by) the operator in order to be considered capable of implementation. Developers and the Environment Agency expressed support for requiring the installation of smart meters capable of reporting renewable energy generation to the Local Authority for monitoring purposes; as no objections were received the proposal will be taken forward. To ensure the policy can be implemented effectively it will be drafted in liaison with Development Control and Section 106 officers as well as relevant service providers and LPAs with experience of implementing such a policy in the London context.</td>
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<td>Air Quality</td>
<td>Resident support for doing more to address air quality along major routes was expressed; given the relatively low level of resident engagement in formal Local Plan consultations this concern is noteworthy. The Environment Agency recommended requiring the enclosure of all new waste facilities, following consultation with local waste experts and review of other plans this expectation appears reasonable and will be added to the relevant waste policy / cross-referenced. While some developers expressed a view that air quality should be dealt with via conditions alone, given the severity of the problem and level of concern locally, regionally, and nationally, a strong policy position is considered appropriate. As proposed, air quality will be addressed via a dedicated policy taking into account recommendations from the Mayor of London’s Draft Environment Strategy (published August 2017). Given benefits to IIA objectives, specifically health and the overall improvement of air quality, options are taken forward and drafted in liaison with the Council’s Environmental Health team. New reference to London Plan guidance should help strengthen planning’s response to this issue and aid developers in responding to new requirements. 8 (re-titled policy SC5) plus new amendments as discussed.</td>
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<td>Biodiversity &amp; Green Infrastructure</td>
<td>Proposals around biodiversity net-gain and the use of relevant valuation tools were supported by developers and Natural England alike. As no concerns with the introduction of planting resilience requirements were identified this will also be taken forward. Whilst the Environment Agency made a general comment about how the Local Plan will implement London Plan biodiversity policies, this concern was not echoed by the GLA itself; it’s considered likely that when Local Plan policies are read in the round (via the Proposed Submission Draft) its approach will be clear.</td>
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Resident support for greening in new development and the greening of existing spaces and routes was received; given the relatively low level of resident participation in Local Plan consultations this is notable. Green infrastructure (not just that comprising open spaces) has also been frequently cited by residents as an important part of their local environment through engagement activities including Council surveys, Newham Mayor’s Show, and via elected representatives. As such, the approach of identifying, protecting, and promoting GI will be pursued. Support for additional GI designations and further specification / promotion of the Lea River Park was received from the Lea Valley Regional Park Authority. Other site-specific GI issues are examined below. Specification around the value of connectivity within green infrastructure has been added following concerns expressed by Natural England.

Raised by the GLA, the strategic importance of the Capital Ring walking route is already embedded in policy (INF2) - it will additionally be flagged in newly drafted Open Space and Outdoor Recreation policy.

Whilst the objection to green space designation in front of 'The Crystal' is noted, this is a strategically important visitor location adjacent to the dock, 'beach', and cable car. As the only greened space in the immediate area its value is significant. Moreover, the green infrastructure designation is innately flexible in that if the same quantum and quality of space is provided (noting that dockside location is a crucial component of its quality), reconfiguration is possible.

While a site known as Lady Trower Trust was proposed for green space release / housing development, the land is MOL / SINC and in a high risk flood zone. In the absence of design proposals the change will not be taken forward at this time, the proposal could be dealt with as a departure to the plan were an acceptable way to overcome the issues above identified.

Given its relevance to aspirations for the River Lea (i.e. enhancement of the waterway and waterside environment) and lack of industrial role, the suggestion to release Cody
Dock from its SIL designation (the water only) is taken forward; edges and reed bed will be designated as green infrastructure, linking to the adjacent designation and enhancing the continuity of green links along the Lea.

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<th>Waste</th>
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<td>Comments from the landowners and neighbouring landowners were received in support of releasing the safeguarded waste site at Beckton Riverside. While ELWA have confirmed the unsuitability of this site for their purposes, the safeguarding cannot be formally released without robust demonstration that it is not needed to meet waste handling obligations. As such, Joint Waste Plan review will be commenced during the Local Plan Review period, and the issue is flagged in revised policy INF4. As such the Beckton Riverside strategic site will be allocated without the formal removal of the waste site allocation, making clear that proposals will either need confirmation that the safeguarded waste site is no longer needed or will need to enable the allocated use, either in the location safeguarded or elsewhere within the site as most appropriate.</td>
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Whilst developer objections to the proposed Site Waste Management Plan requirement were received, the London Plan states clearly that Local Authorities should ‘require developers to produce site waste management plans to arrange for the efficient handling of CE&D waste and materials’ (5.18), in addition, Environment Agency advice encouraged their use, setting out the benefits outline in the policy justification as drafted. Given the scale of development in Newham and national guidance that makes clear in various places that management and reduction / re-use of CD&E waste comes within the remit of the planning system, it would be remiss not to ensure that developers evidence the existing Local Plan aspiration (SC1) that development responds to a changing climate by (amongst other things) reusing and recycling waste arising from demolition and construction. The better handling of construction waste would be expected to have myriad benefits in relation to IIA objective, including health, successful places, high

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2 NPPF – ‘the planning system must play a role in minimising waste and pollution’, and LPAs should ‘so far as practicable, take account of the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials’

PPG – ‘waste planning authorities should plan for the sustainable management of waste including… construction/demolition’

National Planning Policy for Waste - ‘When determining planning applications for non-waste development, local planning authorities should, to the extent appropriate to their responsibilities, ensure that: the handling of waste arising from the construction and operation of development maximises reuse/recovery opportunities, and minimises off-site disposal.’
functioning transport networks, resources efficiency, minimisation of waste, and air quality improvement.

The policy addition will not be overly prescriptive, SWMPs could for example be high-level / framework in nature at application stage, allowing officers to assess whether schemes are capable of meeting strategic aspirations such as the transport of waste and materials by river and rail as far as practicable. With greater clarity over handling expectations embedded in policy and certain detail held over to construction stage via condition, the addition is considered reasonable, justified and necessary to satisfy regional requirement.

Given the significant benefits in terms of environmental impacts including air quality, Environment Agency suggestion to require the enclosure of waste facilities has been added. This will be applied to other similar emissions and dust generating uses, but caveated for implementation purposes with the recognition that ‘equivalent environmental protection’ would be acceptable where full enclosure is not possible.

To foreground the benefits of designing and constructing adaptable building, the idea will be cross-referenced into overarching sustainability policy SC3. In the interests of flexibility, the use of the BIM modelling system will not be proscribed in policy but flagged as an example of how to implement strategic principles.

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<th>Water efficiency (new)</th>
<th>Both the Environment Agency and Thames Water made representations regarding the pressure on London’s water supply and the need for Local Authorities and developers to address water efficiency more stringently. In line with other requirements that seek to ensure development is as sustainable and resilient to climate change as possible, suggestions regarding a requirement for ‘excellent’ water efficiency in all schemes subject to a BREEAM assessment, and a demonstration of sufficient water infrastructure capacity before the grant of planning permission will be taken forward (suggestions regarding the use of the use of water efficiency calculators will be added to implementation advice). Policies will be drafted in consultation with Thames Water, the Environment Agency, and development management officers to ensure they are fit-for-purpose and effective, developers and other interested parties will have a further chance</th>
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Other / new / suggested

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<th>to comment during Reg.19 consultation.</th>
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| In I&O consultation, the Environment Agency suggested that developers should be alerted to the risks of potential geohazards such as sink holes. Given the Local Plan’s aspirations to steer development that is resilient to climate change, as sustainable as possible, and avoids adverse impacts, the issue is considered relevant and worth including. The British Geological Society (BGS) article *Geohazard Information*\(^3\) sets out that geohazards are susceptible to climate change, that the clay of the Thames Basin makes London particularly susceptible to ‘shrink swell’ effects (whereby changes in temperature and the water table cause ground clays to shrink when dry and swell when hydrated), and that geohazards are a significant but often unrecognised threat that contribute to additional/unexpected construction costs and substantial insurance losses. The BGS produces relevant data under the name ‘Geosure’ which will help inform implementation; as the costs of investigation are impossible to generalize and no recognised system of geohazard investigation/approval exists, the policy will be advisory rather than add specific standards to be met by development.

In light of recent resident feedback, the issue of overheating has been added to policy SC1. Modern building standards, construction choices, glazing expectations, and energy solutions are known to contribute to overheating problems in many modern buildings, particularly high density or tall building developments. Given recognised methods of assessing risk of overheating exist, and in light of benefits to various IIA objectives (health, access to high quality housing) new requirements will be added.

The need for contamination assessment is already embedded in the Local Plan and will be carried forward in SC1.

Given the potential environmental benefits of deculverting, the principle has been added, albeit subject to wider site considerations (such as loss of developable land and effects on sewerage function).

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\(^3\) *Geohazard Information*, Matt Harrison – p.10 *Earthwise 24, British Geological Society, 2007*
Options Proposed
1. Do nothing except reorganise and integrate policies to reduce overlap / provide clarity about requirements.
2. Re-visit the viability of BREEAM non-residential and Zero Carbon residential development in Newham as part of broader viability testing.

Flooding & Drainage
3. Strengthen the plan’s response to flood risk by:
   a. Incorporating recommendations of the updated SFRA;
   b. Establishing in principle support for flood defence improvements, subject to compliance with other relevant policies
   c. Clarifying design requirements in Flood Zones 2 and 3 by specifying that in addition to the appropriate siting of vulnerable uses above ground floor level, we encourage the deployment of smart design including:
      i. locating a broader range of less vulnerable uses at ground floor (storage and utility rooms, ancillary living space (excluding bedrooms) such as studies and garden rooms, utilities e.g. grey water and refuse storage, bike parking, employment-generating uses where in accordance with the spatial strategy), and
      ii. using build specifications and materials at ground level that can accommodate and withstand flooding (raised floors, elevated utilities, flood resistant membranes etc.)

Energy
4. Make clear that applications for development that will increase the capacity of energy and telecoms infrastructure where there is an identified need will generally be supported, subject to compliance with other relevant plan policies.
5. Promote the use of open water heat pumps by:
   a. Expressing a general support for their use
   b. Specifying that major developments within 500m of open water (the Royal Docks or River Thames) should investigate the feasibility of using heat pumps.
6. Improve the delivery of decentralised energy by requiring the construction standards of the London Heat Network Manual and specifying the vicinity within which major developments should connect to heat networks;
   a. Within 1km of an existing network, connection must occur before occupation.
   b. Within 1km of a network scheduled to be operational within 3 years of the grant of planning permission, connection should be provided for and the arrangements facilitating it explained.
   c. Within 500m of a potential network as per the London Heat Map, connection should be provided for.
7. Introduce a requirement to incorporate low-cost energy use and generation monitoring apparatus into major new development.

Air Quality
8. Create a standalone policy that promotes air quality improvements by:
   a. Drawing together and being clearer about existing requirements including (from SP2, SP8, SP9, SC5):
      i. Refusing the grant of planning permission unless it is demonstrated that emissions from the construction process will be minimised and controlled;
      ii. Avoiding an increase in specified pollutants within AQMAs and requiring mitigation where developments increase exposure in those areas;
      iii. Requiring Air Quality Impact Assessments with certain proposals.
   b. Adding to the above by:
      i. Requiring all development to at least deliver an ‘air quality neutral’ standard;
      ii. Requiring schemes that include outdoor space to consider positioning in relation to pollutant sources (roads);
      iii. Requiring additional mitigation (such as the provision of trees) in new ‘sensitive receptor’ uses such as housing and schools.

Biodiversity & Green Infrastructure

9. Improve the protection of biodiversity and delivery of net gain by:
   a. Introducing a requirement that soft landscaping and GI elements are resilient to climate change and disease (i.e. through planting choices that ensure a diversity of species and require little water / can withstand increased temperatures)
   b. Endorsing use of DEFRA’s biodiversity metric to standardise valuation.

10. Strengthen the protection and delivery of green infrastructure by:
    a. Designating missing sites as identified in Part 2 ‘Green Infrastructure Additions’;
    b. Modifying MOL designation around Beckton Sewage Works to better reflect up-to-date operational use, legal obligations, and strategic aspiration (see Part 2);
    c. Re-visiting site-specific, spatial and thematic policies to ensure position around GI is fully reflected in each in relation to:
       i. River Thames, Lea and Roding frontage and connectivity (S2, S3, S4, S5 and INF6) including through industrial sites where redevelopment is expected (e.g. Albert Island)
       ii. The specifications around location of open space within sites (ensuring that the location ensures improved quality, connectivity and accessibility especially where it is a re-location of an existing facility)
       iii. Combining HSG22 and HSG23 into a strategic site together with the Hallsville Site reflecting ambitions for a linear central green route and connectivity (as well as housing and a new school).
       iv. Being more ambitious about the amount of open space in S15 Canning Town East and clearer about the reconfiguration of open space in S13 Manor Road.
v. Being clearer about the strategic open space roles to be played by the Limmo, Royal Victoria and Twelvetrees gasholders site (proposed to become part of the S12 Strategic Site) and the scale and accessibility of such open space.

**Resource Efficiency & Waste**

11. Highlight the requirement for buildings to be designed to be as flexible to future adaptation as possible and encourage the use of technologies such as Building Information Modelling (BIM).

12. Require Site Waste Management Plans to ensure that waste arising from demolition and construction is dealt with as sustainably as possible.

13. Highlight that the safeguarded waste site at Beckton Riverside (Schedule 2 of the Joint Waste Plan, page 52) may not be needed and that this option should be factored into masterplanning of the area.
## Recap of review aims

1. Update the strategic transport policy to reflect current investment priorities for Newham and strategic transport providers, working with providers to ensure that these can also absorb the impacts of new developments proposed but also ensure that supporting infrastructure reflects the evolution of the network and change in development context.

2. Specify new sustainable transport interventions and connections that site allocations will require individually and in concert to maximise their positive impact.

3. Set out a more locally specific, context-sensitive methodology to determine appropriate levels of car-parking whilst maximising sustainable transport opportunities, as per the NPPF.

4. Otherwise clarify and update policies as necessary in light of the issues identified above and the over-arching strategic intentions of these policies.

<table>
<thead>
<tr>
<th>Topic</th>
<th>Analysis of Evidence (technical / engagement / IIA)</th>
<th>Carry forward from I&amp;O:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do nothing more than what is already do policies INF1 and INF2 and others as crossed-referenced</td>
<td>Overall, it is considered there was general support for both policies INF1 and INF2 as currently written in the Local Plan and the approach to support the overall shift to a more sustainable pattern of movement across Newham. On the whole the policies are performing well and sufficiently cover the sub topics under transport. However, whilst the approach to the current adopted policies is supported, updates to reflect strategic investment priorities for London and sustainable travel initiatives to reflect growth and sustainable travel initiatives</td>
<td>Maintain present policy thrusts but proceed with other alterations as discussed below.</td>
</tr>
</tbody>
</table>
across London should be addressed in this review and discussed below.

<table>
<thead>
<tr>
<th>Strategic Transport: Clarify and Update</th>
<th>2. Ensure the objective is wholly reflected</th>
</tr>
</thead>
<tbody>
<tr>
<td>Transport policy INF1 seeks to secure investment in strategic transports to support investment and regeneration in Newham. The policy seeks ongoing improvement to further connect Newham to the rest of London whilst addressing major physical barriers to movement whilst ensuring a high quality environment for all. With Newham and London’s overall London’s population expected to rise, this will have increased pressures on the movement of people and freight as well as the existing transport network across the borough. INF1 will seek to improve transport with cross reference to a series of strategic transport initiatives including those set out in the 2017 Draft Mayor’s Transport Strategy (DMTS) and Newham’s Infrastructure Delivery Plan (IDP). As such addressing and updating policy INF1 as highlighted below will better secure an uplift in public transport capacity through a series of infrastructure initiatives in policy to support growth in Newham.</td>
<td></td>
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<tr>
<td>There was general support to update the strategic transport policy (INF1) to reflect current investment priorities for Newham and transport providers to support the growth across the borough and to better connect Newham with London. Particularly representations at the Issues and Options stage supported the approach to strengthen the role of safeguarded transport infrastructure, ensuring and improving the quality of public transport service through upgrades and enhancements (particularly around DLR stations and bus services), as well as improving Newham’s walking and cycling routes (including the Leaway and promotion of continuous river routes).</td>
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<tr>
<td>As set out in the IIA, these options seek to support growth by securing investment in strategic transport opportunities and to support the overall shift to a more sustainable pattern of movement across Newham. It is envisaged the options to update the policy will have positive impacts in relation to sustainable travel which has added economic, health and environmental</td>
<td></td>
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</table>

Carry forward the following options; Option 2 with added reference to additional strategic transport projects including; East London Transit, Albert Island Strategic Boatyard and Potential for a LCY Crossrail Station (in principle) in INF1

Clarity in implementation to cross reference IDP and recognise the DMTS to support/update initiatives

Reference to SP8 to manage negative impacts of transport infrastructure.
benefits (including air quality) for Newham, whilst it does not preclude the achievement of other objectives through its implementation.

2.a Negative impacts evaluated for major transport
As the policy seeks to promote investment in the strategic transport network, ensuring this is not at the expense of the quality of environment for all is a key tenet of the policy. The Mayors Draft Transport Strategy (MDTS) notes that key environmental issues such as air quality must be addressed, as well as the promotion of healthy streets and a good public transport experience for its users. This is particularly important in relation to the population growth and development expected in Newham over the plan period. Already the local plan policies seek to create successful places and manage these impacts (SP2, SP8), however the explicit reference as a strategic objective in policy INF1 is key to ensure infrastructure delivery is secured, impacts spatially and operationally are managed whilst improving the overall quality of environment.

Engagement records note that negative impacts of transport remain a concern, particularly around congestion associated with works, bus reliability and service and the barrier effect from surface lines and depots. Resident engagement and monitoring identifies that public transport reliability particularly bus journey times are a concern which if not managed may worsen with increased development. The explicit reference in INF1 as a strategic principle seeks to fully consider the positive and negative impacts that transport has on people’s environment, to improve the public transport service and promote a more sustainable pattern of movement in Newham for both residents and its service users.

2.b Strategic transport priorities LBN
In relation to reinforcing and managing impacts of major transport infrastructure the policy sets out to update a series of strategic transport projects to lever investment, support a modal shift towards more sustainable
modes. Engagement with transport colleagues alongside detail set out in the Draft Mayors Transport Strategy provided sufficient clarity on the longer-term priorities for Newham in support of a modal shift towards more sustainable modes. In updating the policy to reflect current priorities this has positive impacts on the IIA objectives, as the update is essential to ensure residents have access to jobs, social infrastructure and places to visit. Strategically it is important that the IDP is a ‘living’ document which will be regularly updated over the plan period and policy INF1 is to be read and referenced in conjunction with the IDP. The IDP reflects strategic transport priorities and the objectives set out in the DMTS including various station upgrade proposals which will also be reflected in strategic site boundaries or separate allocations as necessary.

Additional suggestions were put forward at the Issues and Options stage to reference strategic transport proposals including a Crossrail Station at London City Airport, boatyard serving strategic need at LIL 12 (Albert Island) and the potential Silvertown Tunnel (under river crossing) as part of the updating of policy INF1. As such support in principle (subject to no network effects) will be added to INF1 to support continued expansion of passenger and freight transport on the River Thames and enhancements to the Elizabeth Line to meet growth demands.

Issues and Options and IDP representations from LCY raised that reference to the Airport Masterplan (2006) should be maintained. However in revisiting the policy’s approach, it is no longer considered appropriate to refer to either, given cross referencing of the IDP where such matters are covered, and instead to refer to capacity optimisation and enhancement of public transport access as strategic projects.

In relation to wharves, the consolidation approach (in Thameside West) set out at the Issues and options was generally supported by the PLA and the GLA. Following the Issues and Options stage joint discussions with the GLA
provided further evidence that the consolidation approach on Royal Primrose, together with the re-activation of Peruvian Wharf could support capacity demands should wharves be released (subject to criteria in para 7.77 the London Plan) in Thameside West, with no loss functionality. This decision will be subject to the findings of the forthcoming safeguarded wharves review. One residential developer objected to the continued safeguarding of a number of wharves in Thameside West, but this process should address such concerns in a strategic manner.

Another concern was raised that boats serving wharves were using outdated technologies making them unnecessarily noisy, and that rather than treating new development (which is expensive), a fund could be set up to enable investment in new technology. However, the PLA have advised that boats have very long lifespans and even retrofitting is extremely costly. Inevitably land use change, which often results in significant land value uplifts requires management of neighbourliness and transitions, and this is considered to be a necessary part of that regeneration package. Overall, the Council's approach to support the release of wharves and consolidation in Thameside West is considered appropriate to support existing operational requirements and future freight demands for London.

### 2.c Safeguarded strategic transport

Two representors objected to the policy, particularly around the need for capacity requirements for the DLR depot to expand to meet the growth envisaged for Beckton and relocation concerns around feasibility and alternate sites. It was highlighted from developers that managing the negative impacts of transport infrastructure would be supported to ensure land take from transport infrastructure does not adversely impact on significant development potential for the wider area. The development industry note that a robust and comprehensive assessment of investment proposals for transport infrastructure with large land takes (notably DLR depot requirements) and site options (including alternate sites) should be explored
to ensure maximum opportunities for development of the wider area are not missed, whilst ensuring provision for depot expansion is assessed. As part of the policy the more explicit reference to ensure a comprehensive assessment of impacts for transport infrastructure are considered, notably addressing environmental impacts and securing their compatibility with surrounding land uses will be essential to securing investment as well as improving overall quality of life for residents across the Borough.

In reference to Thames Gateway Bridge safeguarding, two representors highlighted that the safeguarding is a physical constraint to support growth notably on the future plans for upgrades at Beckton Sewage Treatment Works and the other noting a constraint on the development of the wider area and should be kept to a minimum. Although the development plan cannot revoke such safeguarding, new criteria and the Beckton Riverside site allocation stress the importance of ensuring the requirements of transport infrastructure and other land uses and residents are carefully balanced to support overarching objectives for Newham.

The MDTS sets out to prioritise buses on key routes ensuring they are reliable and have to support growth for new development. With significant development forecast in Barking Riverside and Beckton, the MTS supports dedicated public transport including rapid bus transits to unlock Opportunity Areas and improve connectivity to support the Mayors ‘good growth’ agenda. As such, with the aim of unlocking new areas of development, the East London Transit system providing a high quality bus-based transit system connecting key growth areas in London Riverside should be referenced INF1. With early discussions on the feasibility of the East London Transit underway (by TfL and various stakeholders/neighbouring Boroughs) it would be appropriate to add reference in policy to support its development. Engagement records and monitoring highlight that quality of bus service such as bus journey times remains an issue, particularly for residents in the Borough. It was noted that cross boundary east-west bus transit by Barking
and Dagenham remains a key project to connecting growth areas in London Riverside. Improvements to the bus network also allow public transport enhancement into development areas in the short term and reference made in the transport policy as a strategic transport principle.

**River Crossings**
The MDTS seeks to support transport river crossings with public transport opportunities to unlock these growth areas as well as improving overall connectivity across London. With growth proposed in Beckton Riverside and the sub-region, reference to support potential river crossings is set out as a strategic principle and partnership working with key stakeholder. In particular close liaison with stakeholders particularly Thames Water, TfL and neighbouring boroughs it is considered appropriate to reference this as part of river crossings, to support growth in this region.

**Conclusion**
Overall, it is considered appropriate to proceed with the policy amendments whilst adding references to new strategic transport proposals (notably strategic boatyard and potential Crossrail Station at LCY) to reflect and update strategic transport investment priorities and support growth across Newham. To support policy INF1 it is the intention that the policy should give more weight to and read in conjunction with the IDP (including subsequent updates) to support the implementation of strategic transport priorities across Newham. The option to review and update the strategic transport policies as set out above will better secure an uplift in public transport capacity through a series of infrastructure initiatives to support growth and a more sustainable pattern of movement in Newham.

| Sustainable Transport | In the context of forecasted population growth, it is essential to ensure the borough’s transport network can support growth. Transport policy INF2 seeks to secure a more sustainable pattern of movement in Newham maximising the accessibility of the public transport network and to promote walking and Carry forward Option 3 (additionally to clarify support for |
cycling across the borough to reduce congestion and improve overall quality of life for Newham’s residents.

**Engagement**
Residents agree that sustainable transport has improved with key infrastructure projects implemented include Cycle Superhighways and Quietways alongside overall improved accessibility to Newham’s walkways. There was general support to promote a more sustainable pattern of movement in Newham in particular key points raised were:

- More car sharing opportunities
- Improve cycleways in ‘Urban Newham’
- Improve pedestrian accessibility to walking and cycling routes (including Leaway and other riverside routes)
- No reference to car free development

Policy INF2 remains appropriate to support the strategic objectives to promote sustainable travel in Newham, however whilst high levels of car usage/ownership remain a concern, options to refine the approach in policy for car parking assessments is supported and adding to the policy detail to better secure sustainable transport initiatives as Newham continues to grow will be essential to the policy. As per the MDTS the policy seeks to secure both strategic and small scale improvements to improve sustainable travel in Newham to support the overall arching objective for a more sustainable pattern of movement across the borough.

**Option a: Car Parking**
Currently policy INF2 seeks to assess the appropriate level of car parking reflecting the maximum standards as set out in the London Plan. Car usage is high and congestion remains a concern (especially at the expense of bus service quality). Planning has a key role to support the modal shift to a more sustainable pattern of movement and to ensure that the planning of new car free development in STOAs.

- Add reference to requirements for electric charging points (linked to SP8).
homes and jobs does not lead to greater car dependency. The MDTS sets out an approach to reduce car dependency through improving the whole journey experience of using public transport and walking and cycling routes. In relation to the engagement the following points were raised:

- Ongoing approach maximising car sharing opportunities is supported to improve congestion and air quality
- Car free developments in highly accessible locations
- Parking for industrial premises should be sufficiently flexible to reflect working patterns (such as fleets and overlap between day and night shifts)

The proposed policy would set out the considerations the Council will use when determining car parking levels around the maximum standards (e.g. local car ownership/available parking levels, public transport accessibility and the character and nature of proposed development). As such the proposed option allows for greater flexibility allowed by national policy on car parking, it responds to local concerns about congestion in residential areas whilst it continues to reflect the London Plan by preventing overprovision (noting that these can lead to greater issues through the cumulative impacts) of car parking. As such the policy will reflect the approach set out in the NPPF with a greater focus on local context and considerations to reduce reliance on the car and congestion across Newham.

Developer responses highlighted that policies should support car free developments in highly accessible locations. The policy approach seeks to clarify car parking assessments specifically factoring in accessibility, London Plan standards, the proposal and local car ownership. As part of the policy approach to tackle high levels of car ownership, the policy has included Sustainable Travel Opportunity Areas (STOAs) from SP9, to provide a greater focus for the role of these locations to tackle car ownership levels and congestion. Whereby development is located in highly accessible locations.
(Sustainable Travel Opportunity areas) it is expected the proposals will maximise sustainable travel options including car-free development.

**Option b:**
The policy options seek to ensure all opportunities are maximised to promote sustainable transport, congestion is reduced and the reliance on the car is significantly decreased. Engagement and monitoring highlights that congestion (including impacts on air quality), car ownership remain an issue and sustainable travel can be improved further notably around quality of bus service and walking and cycling infrastructure. With investment to the strategic transport network including cycling infrastructure, Newham has seen improvements in sustainable travel. Representations from both residents and development industry generally supported approaches to improve sustainable travel measures in policy, including ensuring the high quality provision of and access to walking and cycling infrastructure and measures to reduce reliance on the car.

Support for measures to reduce traffic and transport impacts through car clubs and electric charging are supported through the representations received. As such the policy makes cross-reference policy SP8 to ensure environmental impacts from transport are reduced (including air quality), road safety, sustainable travel opportunities are maximised (including Car Clubs and electric charging points) and best practice guidance/standards are applied to all schemes would be a key component of achieving ‘neighbourly development’.

Implementation/IDP
The policy will be supported by the IDP which sets out a series of strategic and local transport initiatives and requirements across the Borough. Transport for London provide funding to all London boroughs to produce a Local Implementation Plan (LIP) to support the Mayor’s Transport Strategy. Newham’s LIP sets out how the Council will deliver both strategic and local
transport improvements for the borough.

The implementation of the policy will be monitored through published Authority Monitoring Reports (AMR) detailing the progress of the Local Plan against contextual indicators relating to transport. Engagement and findings from the AMR highlight that

Overall, policy INF2 as written performs well and options scoped above to proceed with the policy amendments to provide greater clarity and focus across the wider policies to support a more sustainable pattern of movement across the borough. It is considered appropriate to proceed with the policy amendments as noted above particularly amendments around car parking assessments, further clarity around managing/mitigating environmental impacts and ensuring sustainable modes of transport are promoted/implemented across all schemes to promote the shift towards more sustainable modes of transport.

| Strategic sites and Spatial Policies | Spatially, development has an important role in supporting objectives for improving connectivity and promoting a more sustainable pattern of movement. Improved walkability and permeability is a key strategic objective of the plan, and whereby there are large levels of development expected opportunities should be maximised. There was general support for the promotion of high quality and safe walking and cycling across Newham including continuous riverside routes. The DMTS sets out a commitment to ensure walking and cycling is promoted as part of the ‘healthy streets’ agenda including an aim to ensure 70% of Londoner’s live within 400m of a safe cycle route alongside high quality walking routes.. Connectivity was highlighted as a key issue especially going north and south in the Royal Docks. | Carry forward option 4 and ensure 200m/400m are promote as far as practicable on strategic sites. |
One developer contended that securing pedestrian connections at 200m frequencies on strategic sites is not appropriate given factors such as individual site constraints which should be considered at the application stage or area based SPG’s. The option to promote walking and cycling frequencies (at 200m and 400m frequencies) as far as practicable seeks to ensure spatial policies contributes to the improved connectivity at these locations and better secures the delivery of integrated, connected and well-functioning neighbourhoods. Healthy Streets approach seeks to prioritise walking and cycling and public transport, including promotion of a high quality bus service to support the modal shift to greater public transport usage. European modelling notes that a mesh width of 200/250m. In securing these frequencies this makes the bicycle strongly competitive over short distances and as such a key component to securing regular frequencies to promote cycling, especially in locations whereby there is major redevelopment and opportunities to secure better cycling routes and interconnect neighbourhoods, particularly in the Royal Docks.

In relation to bus frequencies TfL Streetscape Guidance highlights that bus stops should be based on operational circumstances and that generally bus stops should be provided at intervals between 300m-400m as they play an important role as gateways to other areas. As such the policy will seek to secure regular frequencies reflecting the guidance, as a key component to unlock sites identified for major development to the wider area. The Royal Docks Local Transport Design Guidance (2015) highlights that a series of integrated local connections will create a more liveable, accessible and integrated urban grain which will encourage active travel. This is particularly important in the Royal Docks which is predominantly industrial in nature. Therefore the approach sets out in principle the expectations to improve pedestrian and cycle routes as a key component to support the objectives to interconnect and consolidate neighbourhoods alongside improved access to the river.
Improving connectivity and securing a high quality inclusive environment remains a key priority in the plan of successful place making. The DMTS highlights a commitment to ensure stations are more accessible and inclusive, including making more stations step-free. Where connectivity and accessibility remain a challenge, setting out and clarifying the expectations of particular sites will form part of the objective to improve the overall transport experience and promote sustainable travel opportunities for all.

**DLR depot reconfiguration**
Representations put forward by the GLA and TfL contested the option to factor in DLR depot reconfiguration/re-location at Beckton Riverside to support growth and a balance of jobs, homes and associated infrastructure. Representations received from the land owners and development industry accept that further discussions are required with TfL to identify feasible options for the depot which will be a factor in the wider site allocation. Further details on this are set out in the Options Appraisal under Beckton Riverside, though the general policy intention of this option is now reflected in the strategic principle concerning careful evaluation of the disbenefits as well as the benefits of strategic transport infrastructure.

**Policy Amendments**

1. Do nothing more than we already do as set out in policies INF1 and INF2 and others as cross-referenced

2. **Clarify and update policy INF1 to:**

   i. Ensure that the objective is wholly reflected in the policy, in particular, that negative impacts are properly evaluated and mitigated in proposals for major transport investment, (appropriately cross-referencing SP2, SP8 and SP9) with due consideration given to alternative options which may have lesser spatial and other opportunity costs.
ii. Update policy references to ensure that they reflect current investment priorities and realities for Newham notably in relation to:
   a. Crossrail/ Crossrail 2 (proposed eastern extension)
   b. London Overground (ongoing support for increased capacity and extensions to the orbital rail system (Overground)
   c. the Leaway, river crossings,
   d. the DLR (further policy reference to support extensions to the DLR network with an explicit reference supporting extensions at Barking and Thamesmead)
   e. Upper Lea Valley rail (policy support and explicit reference for increase capacity and service enhancements between Upper Lee Valley and Stratford)
   f. cable car (strengthen the policy reference to encourage measures to improve local usage of the cable car as a transport link),
   g. step-free station access (in line with City Hall aspirations; explicit reference at Plaistow, Upton Park and East Ham stations)
   h. wharves and navigable waterways (further encouraging wharf consolidation where strategically advantageous)
   i. and freight railheads/sidings (acknowledging there are none to safeguard in the LPA area)
   j. the airport (delete reference to the out of date masterplan).

iii. Strengthen and reinforce in policy the role of safeguarded transport infrastructure e.g. radar sightlines, stations and mooring points as part of the strategic transport network and regeneration objectives, whilst clarifying that infrastructure with a large land take (e.g. depots) should not be extended further and providers will be encouraged to consider ways to reduce its spatial impact consistent with the evolution of the network and opportunity costs.

iv. Structure the policy with more numbers and sub numbers and otherwise update and bring clarity, focus, conciseness and comprehensiveness
3. **Amend Policy INF2 to:**

(i) to be clear that London Plan standards are a starting point for establishing parking levels, but accessibility, type of development, local car ownership and the overall need to reduce the use of high-emission vehicles will also be considerations

(ii) Otherwise update and bring clarity, focus, conciseness and comprehensiveness notably through appropriate cross-referencing of SP8
Recap of review aims:

- Re-visit the definition of community facilities in Policy INF8 particularly as used in INF10, so that it fits appropriately with the strategy set out for these uses, and clarifies the status of those which may otherwise fall between policies.
- Make the policies more sensitive to market processes including development viability and the difficulty of finding new social infrastructure sites, further encouraging mixed use and flexible use principles.
- Make site allocations that are cognisant of social infrastructure providers’ estates plans, where these are of local benefit.
- Continue to support the strategic management of the town centre network and hierarchy, including a new role for Gallions Reach as part of a wider development area.
- Review social infrastructure policies for clarity, currency, focus, conciseness and comprehensiveness in light of the issues identified above.

<table>
<thead>
<tr>
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<th>Carry forward from I&amp;O:</th>
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<tbody>
<tr>
<td>Do nothing more than is already being done</td>
<td>A public body did express support for there to be no changes made to Social Infrastructure policies. However, this was at odds with the vast majority of responses which were broadly supportive of the proposed changes subject to some minor alterations and clarifications.</td>
<td>No</td>
</tr>
<tr>
<td>Definitions and expectations</td>
<td>Other than support for publicly accessible toilets to be included in the definition of community facilities, and strengthened support for pubs, there were no comments on proposed modifications to the definitions.</td>
<td>Option 2 (a) to (e) to be carried forward.</td>
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<td>IIA says that improving the number of publicly accessible toilets helps to promote social inclusion for increased well-being and mental health. The clarification of the definition of community facilities will ensure that appropriate, quality social infrastructure, a vital component of the overarching</td>
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</tr>
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</table>
Having consulted with DM colleagues to establish that the proposed changes are implementable, the changes proposed will be carried forward.

<table>
<thead>
<tr>
<th>Sites and Spatial Strategy &amp; Managed Release and New Provision</th>
<th>Developers have expressed their support for the option to allow residential and Community Facilities to be provided as part of a single development. Development interests raised the idea that social infrastructure should be dealt with via text based policy rather than site allocations however; a local community group stated more should be allocated, especially in Custom House. The allocation of infrastructure sites is included in order to ensure that providers can make and manage their estates in a strategic manner to best meet their projected needs. There is also support from developers in relation to schools. There is general support for the aims of site allocations related to education from the Education Funding Authority, but how these site allocations will meet the needs of the borough must be demonstrated. This will be achieved through publication of the IDP in parallel with the plan, which also reflects other infrastructure providers' requirements. The CF sites that have been put forward for allocation have been decided upon following intensive discussions with infrastructure providers as part of the IDP process concerning deliverability and suitability as well as overall need. There have been concerns raised by residents about the redevelopment of Newham Leisure Centre as it provides important facilities for the community. Although a formal decision is yet to be made by the Council, the evidence base confirms that the leisure centre will reach the end of its life within the plan period, requiring intervention in some form. An allocation as a non-strategic community facility site highlights the site for its role in providing leisure facilities, ensuring that any potential redevelopment would include the re-provision of the leisure facility (and any necessary car-parking) together.</th>
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<tr>
<td>Options: 3 &amp; 5(a) to (f) – carry forward. Options 4(a) to (d) and 7 – clarification is required to ensure that the policy alterations related to the exclusion of certain use classes refers to commercially run community facilities and not community run facilities. This is particularly important in relation to Option 4 (a) and (b) and Option 7. Ensure the rationale for site allocations are reflected in the parallel publication of the IDP.</td>
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with any other compatible/ policy compliant uses that might further enable the site.

In addition to the inclusion of Bow County Court in the IDP, it has also been included in the Viability study that was carried out on behalf of LBN. This assessed the site for community facility provision alongside housing.

The ESFA also highlight that schools should provide adequate playspace and be multi-functional spaces in order to increase the efficiency of the buildings. Developers also support this concept and of schools utilising nearby open space in lieu of having dedicated open space on site.

As set out in the IIA, these options seek to maximise the effectiveness of community facilities, balance competing needs for specific uses and deal with issues of availability of sites to maximise local provision, ensuring its sufficiency and quality in relation to local needs going forward. No significant impact is envisaged other than the possibility of making better use of existing facilities, and land in new development by encouraging multifunctional spaces, assisting in making better use of scarce land resources

Some concerns have been raised by a community group in relation to proposed changes to policy related to allowing ‘market forces’ play more of a role in relation to commercial community facilities. It is acknowledged that this could seem to be implying a lack of planning control, which was not the intention; rather the reference was to reflect national policy that is concerned with commercial competition, as well as broader viability issues. The language used in this policy alteration needs to be set out so as to ensure our aims in relation to commercial community facilities are made clear.

The IIA states that this proposed change, which seek, allow employment-generating uses to evolve where appropriate to meet market opportunities as well as local needs may lead to increased employment and business
opportunities for local residents, promote economic resilience.

Having consulted with DM colleagues to establish that the proposed changes are implementable, the market point is clarified by linking back to town centre use tests set out in the NPPF rather than setting out exceptions/exclusions; with this slight amendment, otherwise changes proposed will be carried forward.

| Retail Network and Hierarchy | Support was expressed for new local centres proposed as part of strategic sites, mainly by developer interests. The owner of Gallions Reach asserted its suitability for major centre designation based on its existing draw and potential to diversify use. The Retail Study 2015 cautions against further out of centre development whilst acknowledging that existing policy allows for Gallions Reach Retail Park will evolve over the plan period to become more like a town centre, in the mix of shops and services provided and the variety of unit sizes. It reiterates that the future of retailing at this site should be linked with wide socio-economic development and change, including new housing, employment and associated infrastructure and community change. The Retail Study also states that a wider plan for the Gallions Reach area should be developed. The IIA states that the options as set out seek to promote new centres where footfall and local population would support their viability which may lead to increased employment and business opportunities for local residents, promoting economic resilience. The IIA also states that the redesign of Gallions Reach retail park would be necessary in order to create a new town centre with a transformation in its access to make it much more walkable and reduce the need to travel to it by car while at the same time enhancing the character of the area through its transformation into a different development typology. | Option 6(a) and (b) to be carried forward. |
These points are reflected in the drafting of the strategic site allocation, updates to spatial policy and INF5.

Having consulted with DM colleagues to establish that the proposed changes are implementable, the changes proposed will be carried forward.

<table>
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<tr>
<th>Other clarifications</th>
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<tbody>
<tr>
<td>Policies have been re-structured as per the general approach across the plan to support neighbourhood planning and make policies easier to use, drawing on feedback from officers and applicants.</td>
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<tr>
<td>Concurrently, INF5 and 5a have been combined, along with INF8 and 10, so all policy criteria relating to one theme are in one place.</td>
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<tr>
<td>Technical criteria have been used to elaborate some strategic principles which have previously been buried in reasoned justification/implementation text (e.g. co-location implications).</td>
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<tr>
<td>As elsewhere, the IDP is more clearly embedded in policy to emphasise its role in assessing sufficiency and need.</td>
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### Policy Amendments

#### Definitions

2. Clarify the definition of community facilities and expectations around their inclusion in new development:
   a. Being clear that it includes lawful D2, A4 and Sui generis uses as well as D1 uses where these are regarded as community facilities by the definition in INF8;
   b. More clearly including pubs, without the caveat ‘where other facilities are lacking’ (as if loss were to be proposed then this would be dealt with by other criteria)
   c. Adding in the specialist housing referred to in H5 to the definition in INF8
   d. Include children’s playspace, playing pitches (including MUGAs) and associated facilities in the definition.
   e. To include public toilets, being clear that new publicly accessible toilets should be provided for in new strategic
development incorporating local or town centres, and that having publicly accessible toilets may be one aspect of making a community facility open to the wider community

Spatial strategy
3. Insert the requirement to Policy INF8 to consider mixed use developments that include new or enhanced community facilities where these are to be re-built or newly provided, alongside other compatible and policy compliant uses, notably housing.

Managed release and new provision
4. Modify policy to more appropriately allow for market forces to operate in relation to commercial community facilities and to better direct these to help realise social infrastructure development plans by
   a) Excluding commercial (D2, A4 and leisure/culture sui generis uses) community facilities from the requirement in INF10:3 to demonstrate local need where proposed in policy compliant locations (as amended to INF8:3:d).
   c) Altering INF10:4 (as amended to INF8:3:e) to allow for a mixed use ‘compromise position’ so that rather than wholesale release of facilities to other uses, or protection as is, mixed use redevelopments incorporating residential and replacement community floorspace meeting need should be allowed for in marketing, and required to be explicitly considered as options (drawing such potential to the attention of local providers that have indicated need) in asset disposal processes.
   d) Clarify that, in relation to marketing requirements In INF10:4b, (as amended to INF8:3:e) benchmark rents would not include peppercorn rents.

Sites and spatial strategy
5. A) Allocate a number of social infrastructure sites to reflect the strategic approaches of providers and to fulfil the local need in relation to:
   i) Health
   ii) Education
   iii) Flexible Community Facilities Sites (mostly mixed use flexible/multi-purpose community facility with residential) taking into consideration other policy criteria about how these should be designed, and where appropriate setting out how key constraints may be overcome.
   iv) Leisure

   b) Update the IDP (Infrastructure Delivery Plan) to reflect up to date health, education and flexible community facility needs, being clear that this is included as a strategic infrastructure plan for the purposes of INF10:3:e.
c) Amend East Ham town hall site (S26) to contain the presumption that the police station site should be considered in conjunction with the adjacent college site.

d) Amend criterion 5 of INF10 (which prioritises health, childcare and education facilities on Strategic Sites) to encourage the consideration of locating meanwhile education and health facilities on Strategic Sites whilst permanent facilities are being built.

e) Clarify that it will be acceptable for schools particularly secondary schools in lieu of dedicated playing fields to have good local access to wider open space suitable for playing pitch provision.

f) Ensure that where new or intensified community facility provision is being proposed, that it takes account of other infrastructure providers'/commissioners’ expressed needs and scope for co-location.

Retail network and hierarchy

6. Update policy INF5 to align with the updated evidence base and strategic spatial strategy:

a) Allocate the Gallions Reach retail park within a Strategic Site with the requirement that it is re-designed and re-provided to form a town centre for the area meeting new local needs in a vertically mixed use and denser format, masterplanned as an integral part of the wider site and with a transformation in its access (to be much more of a ‘walk-to’ centre) and orientation (to serve a new residential hinterland). Make it clear that only local population uplift and re-design as part of that may make it a suitable candidate for Major centre designation.

b) Further new local centres to be specified at:
   i. Lyle Park adjacent to the Silvertown DLR station
   ii. S08 adjacent to the DLR station
   iii. Beckton Riverside alongside appropriate transport nodes where there is less immediate access to the new town centre or other new provision (e.g. at Gallions).

Updated references to Maryland (now a designated local centre) Stratford (now a Metropolitan centre) and Local Shopping parades in INF5a, and continuing aspirations for town centres as set out in INF5.

7. Otherwise update, clarify, focus and consolidate policies including: Managed release and new provision

a. Criterion 4c of INF10 (which allows for release of community facility sites where a facility is unsuitable in size and scale for its location in relation to the spatial strategy and where the local area has good access to a local/town centre) to ensure that this explicitly includes consideration of access to facilities meeting similar local needs where these arise.
### Proposed Strategic Site Allocations

#### Recap of review aims

- Through updates and additions to the vision and spatial policies, reflect the evolution of borough-wide, thematic and area-specific aspirations, recognising progress to date, changes in place character, new opportunities and challenges, and revised Pan-London policy and market contexts.
- Tie together and provide spatial coherence to proposed spatial allocations and designations.

#### Topic Analysis of Evidence (technical / engagement / IIA)

<table>
<thead>
<tr>
<th>Topic</th>
<th>Analysis of Evidence (technical / engagement / IIA)</th>
<th>Carry forward to Proposed Submission stage:</th>
</tr>
</thead>
<tbody>
<tr>
<td>All sites</td>
<td>For site allocation detail, see Appendix 1: Strategic Sites Schedule of the Proposed Submission Local Plan. All proposed site allocations, in addition to the details discussed below, contain information on indicative building heights, justified by the accompanying evidence base. For analysis of the evidence pertaining to heights see the separate Tall Buildings Strategy and Successful Places section of the Options Appraisal – this detail is not repeated below.</td>
<td>Site specific indicative building heights within the site allocation detail.</td>
</tr>
<tr>
<td>S12 - Canning Town Riverside</td>
<td>Support was received at Issues and Options (I&amp;O) Regulation 18 consultation stage from statutory consultees TfL and the GLA, for an employment-led mixed use strategic site allocation, to secure better configuration of a partially underused site and optimise benefits of comprehensive, masterplanned development taking advantage of riverside, edge of town centre location and Canning Town station interchange access, beyond what could be achieved through current LMUA allocation. An allocation would also provide greater scope to maximise opportunities to provide green grid and travel links across the Lea River, and fulfil the site’s role in opening up the Leaway walking and cycling route. The Employment Land evidence</td>
<td>Carry forward Option 1.b) below, albeit without any amendment to SIL that will fall within the boundary, instead focusing on managed intensification in that location, subject to existing uses relocating and wharf safeguarding</td>
</tr>
</tbody>
</table>
base (the ELR) confirms the site’s value for employment generating uses whilst acknowledging that redevelopment on part of the site could also catalyse wider LMUA regeneration benefiting the Canning Town area generally. In the longer term, this could be achieved through comprehensive redevelopment that includes managed intensification of the SIL retained within the boundary to the north west, a prospect which is demonstrated to be viable under all scenarios tested.

That said, and whilst the IIA signposts no major impacts, subject to application of relevant mitigation policies and measures, the realisation of the broader opportunities available through a comprehensive site redevelopment is only possible if European Metal Recycling (EMR) (situated to the north west of the proposed allocation) relocate and as raised by the GLA at I&O stage, subject to release of wharf safeguarding. Whilst the business is actively looking to secure a lease elsewhere to continue trading within the borough, the nature of operations and limited supply of industrial land is proving challenging for locating a potential site, though progress continues to be made. As such the deliverability of a broader masterplanned site is questionable in the immediate short term but is expected to be achieved within the plan period.

| S06 - Coolfin North | Engagement at I&O stage has indicated that the area’s local community group (PEACH) object to boundary of the site that encompasses existing non-strategic residential site allocations together with the Hallsville School site (given the new school site allocation at Royal Road). However, non-strategic site allocations fail to recognise the strategic role of these sites in bringing forward new connections across the area. In addition, engagement with Newham’s Pupil Place Planning team has highlighted the need for capacity increase at this site (in addition to other sites allocated) to accommodate wider growth in the area.

PEACH also raised concerns about the linear green route, given other green space within the area and consider the route would be better utilised for housing delivery. However, the nature of linear green routes or ‘Activity streets’ (that run both to and through the site) does not impede the delivery of housing here; it is a key part of the |
overarching vision for the regeneration of Canning Town and Custom House, providing a legible, high quality public realm link to the town centre and station, with the site being essential for its delivery.

The Environment Agency (EA) however have raised concerns over flood risk in the event of a breach in the tidal defences. The IIA having already assessed the need for relevant mitigation in this regard has not highlighted any other major constraints to allocation, subject to the application of the planning policy framework. Finally, site viability in all scenarios can be achieved.

| S09 - Silvertown Landing | The IIA signposts no major issues, subject to application of relevant mitigation policies and measures (as indicated), engagement at I&O stage has revealed support for the site’s allocation from the development industry and the GLA, and viable development can be achieved. It is therefore appropriate to pursue a site allocation here to positively bring forward development that integrates with the surrounding area and maximises opportunities. Should the Silvertown tunnel be granted a consent, development in this location would need to follow its construction, however the site’s deliver is in no way contingent upon a tunnel in this location. To achieve this SIL release is required (see Jobs section of the OA), however as evidence demonstrates the need to refrain from full-scale SIL release, the retention of some SIL within the site’s boundary allows for consolidation and modernisation of employment floorspace that in turn buffers adjacent SIL and potentially the tunnel portal, providing a transition from employment (cognisant also of the LMUA to the north) towards the residential elements of the site. Integration with the surrounding area is essential for the area’s success, in particular through connections to neighbouring S08 that will include the Local Centre and DLR station, as well as to North Woolwich road and other transport links. Finally, in order to maximise the potential benefits of the site, improved access/ links to and along the river and docks are also included within the allocation. Carry forward Option 3a. below, albeit retaining some SIL land within the boundary and incorporating the need for connectivity to the wider surrounding area and transport links. |

Carry forward Option 3a. below, albeit retaining some SIL land within the boundary and incorporating the need for connectivity to the wider surrounding area and transport links.
| S20 - Lyle Park West | Development interest and activity in this area highlights the opportunity for a strategic allocation to maximise the benefits of a comprehensive and coherent redevelopment in this location, ensuring managed release of SIL as part of a broader strategy for employment land within the borough. The site’s redevelopment is demonstrated to be viable under all scenarios tested. Responses at I&O stage (from the developers, land owners and statutory consultees) have generally been supportive of the allocation, including the incorporation of land that currently is part of S22 Minoco Wharf, indicating that integration of the site with the DLR station and neighbouring S22 (Royal Wharf)—given the two sites’ relationship to the park—should be considered. The potential for further SIL release has also been raised to allow for a boundary extension to include the vacant land adjacent (Royal Primrose wharf) to be included as part of redevelopment proposals on the site, however the PLA have indicated that whilst they would also support the inclusion of this area in the boundary, this would be for the purposes of delivering a new wharf in this location, to achieve the broader strategic objective of wharf consolidation. Whilst the need to establish links to Royal Wharf (S22 Minoco Wharf) and the DLR are clear, this must be achieved via the careful integration, activation and enhancement of the park (relevant to both sites) a factor which is included in the site allocation. A modest Local Centre is appropriate here given the station adjacent location, with a scale reflective of the proximity of another Local Centre proposed on the neighbouring Royal Wharf site. With regards to SIL release and boundary extension, evidence demonstrates the need to cautiously approach SIL release (see Jobs OA) and it continues to not be supported in this area. The Council are however mindful of the necessity to facilitate wharf consolidation in the general area, and support the inclusion of wharfs within strategic site allocations, subject to the emerging GLA’s Safeguarded Wharves review. For this reason, a separate strategic employment site Central Thameside West (see below) is proposed including the area adjacent that will allow for the | Carry forward Option 4.a below incorporating the need for wharf release, with a local centre around the station to serve the site and appropriate connections within and beyond. |
relocation of the wharf on Lyle Park west, as part of consolidation plans, subject to the release of safeguarded wharves.

Natural England also expressed concern over river adjacent development to consider the need to assess the impact on Thames ecology. This would be dealt with via the relevant policy mitigation, as signposted by the IIA and referenced within the Site's Schedule (Appendix 1). No other negative impacts that could not be adequately mitigated by the planning framework were identified.

| S23 - Connaught Riverside | Engagement at I&O stage has indicated general support for a mixed use site allocation (from both the development industry and the local community) also highlighting the need for better pedestrian and cycle connections to the station. This will be achieved by explicit reference to needing to improve connections between the site and LCY DLR through bridging of the railway, extending the site’s boundary to include existing footbridge over DLR, allowing for it to be enhanced as part of the site delivery, and enhanced access to other DLR stations, (supported by thematic policy) together with reference to employment generating uses at the east of the southern sector requiring their own, preferably separate site access. Site boundaries have also been drawn in since I&O stage to reflect build out to the west,

A local residents’ group and Members have further highlighted their support for continued and enhanced provision of employment at this location, alongside housing. Moreover, the employment land evidence base recognises the site as an appropriate place for SIL release, albeit with the need to consolidate industrial activity on the northern part of the site around St. Mark’s Industrial Estate and retain an employment zone as part of mixed use aspirations that will also act as a buffer to neighbouring SIL and allowing for transition within the site itself. The I&O option for employment-led development in the north section of the site, around Traveloge/City Airport, is therefore carried forward, with clarification that the small industrial estate and some additional industrial buildings will become (or convert from SIL to) LIL, and other SIL release in this sector will allow for employment-led mix use and new connections, enhancing the setting of the listed St. Mark’s Church, with potential to Carry forward Option 5 a. with a drawn in boundary reflecting redevelopment that has already occurred, plus indication of school requirement and connections needed, including and extension of boundary to include footbridge over DLR to the east, and more explicit employment specifications concerning opportunities and buffering. |
build on its cultural and community role as well as providing support to the airport (through hotel provision). Buffering of the SIL to the east of the site is also be a requirement, to provide for its continued operation, and hotels and visitor economy would be further supported by extension of the LCY employment hub to include those currently in ‘white land’.

The southern portion of the site, excluding the employment uses ‘buffer’, is suitable for redevelopment for a residential, however access to the river along the southern boundary is essential to ensure that the site’s potential is maximised, contributing to strategic objectives. Engagement with Pupil Place Planning has identified a requirement for a school on site, preferably at Thames Road - included in the allocation.

While development interests have noted that parts of the site could be delivered in the short term, a comprehensive approach to masterplanning the whole site will still be required in order to ensure that phased delivery results in an integrated, connected, well-functioning neighbourhood.

IIA signposts no major issues, subject to application of relevant mitigation policies and measures as indicated, particularly in relation to flood risk (also see SFRA). Scenario testing reveals that viability can be achieved particularly once growth values come into play.

### S04 - North Woolwich Gateway

Woolwich Ferry and foot tunnel is an important gateway to the Royal Docks/ River Thames, and the area at present has numerous under performing heritage assets and a poor relationship with the existing North Woolwich neighbourhood. As such, the area could benefit from enhanced integration and complementary local services and employment, brought about by a strategic site allocation to catalyse transformative change. Development interests (including through Planning and Regeneration activity) together with support from the ELR evidence base all identify that the site is suitable for development; a strategic allocation will help signpost opportunity and deliver a cohesive masterplanned scheme that enhances heritage

Carry forward Option 6a below, plus extension to include SIL (Crossrail site at Unit 1, Standard Industrial Estate), and an emphasis on employment opportunity, with longer term shift to a more residential-friendly
assets (buildings, station, park and river) and has wider positive impacts than just within its boundary. This is supported by the viability evidence as well as the IIA which highlights the potential positive impacts on objectives (signposting no major issues, subject to application of relevant mitigation policies and measures as indicated).

I&O consultation has indicated general support for the allocation, with developers requesting further extension of the allocation into Standard Industrial Estate. However, evidence demonstrates that SIL at this location and that immediately adjacent, is needed to meet demand, as also reflected by the recent application from BT on part of the site. Therefore, it is recommended that the strategic site allocation be extended to the part of the Standard Industrial Estate cleared for Crossrail and that SIL designation be retained as is, allowing for intensification of conforming uses and appropriate consideration of transition (including buffering) to residential and other uses as part of the masterplanning process and design of modern industrial units.

I&O engagement has also identified that the ferry will prevail for some time, and this should be factored into the future of the site. This further supports the rationale for increased employment emphasis on the site, whilst signalling a better environment for residential longer term. Should services at some point cease, the potential opportunity for a future riverboat service is also acknowledged.

In providing a better environment for longer term residential use and increasing emphasis on employment generation, the inclusion of a community and creative offer that will complement rather than compete with the nearby local centre - that should also achieve a significant uplift through the site's new community - is included within the allocation, reflecting Regeneration activity already in train. Local centre benefits however cannot be realised without adequate connections to the site, which also need to allow for access to the DLR station beyond the local centre.

**S01 - Beckton** Representing a potential significant SIL release and complex site allocation, it is environment with a greater range of supporting uses.

**Carry forward Option 7a**

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unsurprising that Beckton Riverside received a number of responses at I&O stage. This included strong support from developers/land owners, particular National Grid in wishing to avoid long term vacancy of decommissioned gasworks, all of whom were positive about the ability for constraints to be overcome, given the collaborative working being undertaken by interested parties.

Support was given for the site’s evolution to include a new town centre, public transport and connectivity improvements (DLR extension and station and new river crossings) together with a request for specific reference to the amount of new homes to come forward, and an acknowledgment that with masterplanning the existing DLR depot could remain in its current location. This was countered by opposition to the waste site, inclusion of heights and densities at this stage in the planning process and a request for removal of the Thames Gateway bridge safeguarding. Other responses from consultees including the GLA and TFL, noted the requirement for the depot’s expansion (opposing its relocation) in meeting the transport needs of not only this site, but others signalled by the Local Plan. Finally, calls for the clarification over the volume and location of SIL release were included in responses.

In terms of SIL, evidence favours partial release, supporting the realisation of wider redevelopment objectives for this area, but acknowledging continued demand from land uses including transport, utilities and industrial/warehousing. This allows for a masterplanned approach to be undertaken in retaining and intensifying viable employment uses and supporting DLR depot growth (the need for which is accepted by the development industry), prioritising land in TfL ownership for this, and encouraging minimal land take elsewhere. It also affords flexibility in relation to remnant/legacy gas pressure (etc.) infrastructure and two outlying Olympic relocations that through masterplanning may be better accommodated elsewhere in the site. Land that is retained as SIL is that currently in use, or in the vicinity of operational uses, provides some scope for intensification, potentially through relocation.
Given the size of the land parcel, this still allows for significant residential development, as well as community and town centre uses meeting needs of new and existing residents, identified by the Council’s pupil place planning team and the NCCG. In terms of specific reference to units deliverable on the site, this is captured within figures for the broader Beckton area, set out in policy S5.

Whilst the option of deleting the waste site safeguarding was flagged and supported at I&O stage, and despite ELWA’s confirmation that the site does not meet their needs, the safeguarding cannot formally be deleted without review of the Joint Waste Plan. Instead, the allocation as drafted will flag the potential release of this site, subject to further evidence work (either in the form of Joint Waste Plan Review or through submission of robust evidence that the site is no longer needed for waste purposes – whichever occurs first). Failing that, development of the site should incorporate a waste use according to local needs, though given the scale of the site this should not impact deliverability. In relation to the bridge safeguarding not only is such safeguarding required to ensure the necessary infrastructure to support the site’s deliverability, it is not within the gift of the site allocation, or indeed the Local Plan, to remove or alter safeguarding directions put in place by the Secretary of State. However, it is acknowledged that as with the depot and utilities, such strategic transport infrastructure should work to reduce spatial implications.

The IIA signals significant positive impacts that allocation could have on objectives to increase housing supply, create a quality new neighbourhood, and provide infrastructure that meets need, signposting no major issues, subject to application of relevant mitigation policies (to be included in site schedule). This would include dealing with concerns raised by Thames Water and Natural England regarding the need for impact assessment on Thames ecology, as well as odour impact studies – also raised by Council Members. Whilst there may be some challenges to the viability on this site, this is likely to evolve alongside general growth and change from
development proposals driving regeneration here. Overall, allocation is appropriate, signalling the prospect of change in this area, facilitating delivery (likely in the medium to long term), including by beginning to define masterplan parameters and joint working required, subject to the incorporation of the necessary infrastructure and mitigation measures identified by the site’s schedule.

| S02 - Alpine Way | A mixed use strategic site at Alpine Way presents opportunities to make better use of the land than the status quo, through new residential and an improved employment offer, whilst better integrating the area with both East Beckton town centre, the adjoining SIL and the existing residential neighbourhood to the east, more clearly defining the town centre boundary. Its allocation therefore will allow for a transition in land uses between the town centre and Windsor Terrace, and appropriate employment uses that are situated buffering the SIL uses adjacent. To facilitate development, separate access requirements for the residential element of the site have been incorporated, ensuring that the long standing problem of development proposals failing to provide appropriate access to Alpine Way and the town centre are overcome.

Options were identified at I&O stage to include a small area of bordering SIL (solar house), an area to the south currently in the town centre as well as the Beckton Alp within the allocation. However, the need to take a more cautious approach in relation to the release of employment land throughout the borough (see Jobs Options Appraisal) together with uncertainty over the future deliverability of the Alp, and the existing relationship with the southern land parcel to the town centre has meant that none of these options have been pursued. This allays concerns expressed by the GLA over SIL release given healthy occupancy rates in neighbouring SIL, whilst utilising the retail space and car park to better provide employment generating uses, alongside residential development.

The EA’s response to I&O consultation included comment on the site in relation to the risk of flooding in the event of a breach in the tidal defences. The IIA having already assessed the need for relevant mitigation in this regard had not highlighted Carry forward Option 8.a) below, incorporating employment use considerations and appropriate access/connections to surrounding area. |
any major constraints to the allocation of the site, subject to the application of the planning policy framework. Scenario testing reveals that viability can be achieved once growth values come into play; delivery is therefore likely to be secured in the medium to long term.

| S03 - East Ham Western Gateway | No formal comments were received during I&O consultation, however Engagement with NCCG and the Council’s Pupil Place Planning team has identified this site as a potentially important location for health and/or (meanwhile) education floorspace. Whilst the existing CFOA designation would support delivery of such uses, allocation as a strategic site should ensure comprehensive masterplanning to maximise the opportunities of the wider site, including delivery of additional housing and public realm improvements commensurate with the location as a town centre gateway site along a key movement corridor. Although viability may be a challenge on this site, given that a substantial portion is within the Council’s ownership, the likelihood of delivery is significantly increased. The IIA signposts no major issues, subject to application of relevant mitigation policies and measures as indicated. | Carry forward Option 9.a) below. |
| S07 - Central Thameside West | A new employment strategic site allocation not included within the Issues and Options document, Central Thameside West, is proposed for employment land uses and wharf development. Whilst allocation does not alter the current land use | New employment strategic site allocation. |
designation which will remain as SIL, it does highlight opportunities and capacity, whilst acknowledging the site’s strategic role in allowing wharf consolidation from other sites (notably S08 and Lyle Park west) subject to safeguarded wharf release, and has the potential to resolve access conflict on Knights Road. Proposals are supported by the employment land evidence base for the site’s role in delivering viable business operations as well as the GLA and PLA, addressing comments made in relation to the need for wharf consolidation (an issue of strategic significance) to be reflected in a strategic site allocation.

### Site Amendments

Vision and Spatial Policies option 4: Introduce new strategic sites as scoped in Issues and Options Part 2: Sites.

1. **S12 - Canning Town Riverside**
   a. Allocate mixed use strategic site including key Lea River Park/green grid connections, with consequent amendments to LMUA and SIL.
   b. No allocation - retain present LMUA and SIL allocation on part of the site.

2. **S06 - Coolfin North**
   a. Allocate mixed use strategic site incorporating school and linear green route, with consequent deletion of 2 non-strategic sites.
   b. No allocation – retain non-strategic site allocations (as per DSPDPD).

3. **S09 - Silvertown Landing**
   a. Allocate mixed use strategic site.
   b. No allocation – retain present SIL protection.

4. **S20 - Lyle Park West**
   a. Allocate mixed use strategic site, with consequent amendments to S22 (Minoco Wharf).
   b. No allocation – northern area remains part of Minoco strategic site and remainder part of SIL.
5. S23 - Connaught Riverside
   a. Allocate for mixed use strategic site.
   b. No allocation - retain as SIL and unallocated sites.

6. S04 - North Woolwich Gateway
   a. Allocate mixed use strategic site, with consequent amendments to SIL and HSG sites.
   b. No new allocation – retain smaller non-strategic site allocation and SIL.

7. S01 - Beckton Riverside
   a. Allocate mixed use strategic site, with consequent amendments to S19 (Albert Basin).
   b. No allocation – retain present SIL protection and existing strategic site allocation to the south.

8. S02 - Alpine Way
   a. Allocate mixed use strategic site.
   b. Allocate (larger) mixed use strategic site with northern, eastern and/or southern additions.
   c. No allocation.

9. S03 - East Ham Western Gateway
   a. Allocate residential-led strategic site, incorporating community uses.
   b. No allocation – maintain existing CFOA designation.

10. East Ham Northern Gateway
    a. Allocate mixed use town centre strategic site (retail, residential, community facilities, business uses).
    b. No allocation – normal town centre sites.
Existing Strategic Site Allocations

Recap of review aims

- Through updates and additions to the vision and spatial policies, reflect the evolution of borough-wide, thematic and area-specific aspirations, recognising progress to date, changes in place character, new opportunities and challenges, and revised Pan-London policy and market contexts.
- Tie together and provide spatial coherence to existing spatial allocations and designations.

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<td>Site specific indicative building heights within the site allocation detail.</td>
</tr>
<tr>
<td></td>
<td>All existing strategic site allocations (discussed in detail below) have been updated with information on indicative building heights, justified by the accompanying evidence base.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>For analysis of the evidence pertaining to heights see the separate Tall Buildings Strategy and Successful Places section of the Options Appraisal – this detail is not repeated below.</td>
<td></td>
</tr>
<tr>
<td>S01 – Stratford North</td>
<td>The site now falls within the LLDC boundary and is no longer within the remit of Newham’s Local Plan.</td>
<td>Remove allocation</td>
</tr>
<tr>
<td>S02 – Stratford Waterfront</td>
<td>The site now falls within the LLDC boundary and is no longer within the remit of Newham’s Local Plan.</td>
<td>Remove allocation</td>
</tr>
<tr>
<td>Site Name</td>
<td>Description</td>
<td>Action</td>
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</tr>
<tr>
<td>Olympic Quarter</td>
<td>The site now falls within the LLDC boundary and is no longer within the remit of Newham’s Local Plan.</td>
<td>Remove allocation</td>
</tr>
<tr>
<td>Chobham Farm</td>
<td>The site now falls within the LLDC boundary and is no longer within the remit of Newham’s Local Plan.</td>
<td>Remove allocation</td>
</tr>
<tr>
<td>Stratford Central</td>
<td>Following the formation of the LLDC that since adopted its own Local Plan, the western part of the site now falls outside of the remit of Newham’s Local Plan, as such the option to draw in the boundary has been taken. In addition, as the importance of the site allocation in delivering of the spatial vision for the area remains but the development context has changed since it was originally introduced prior to the delivery of the Olympic legacy sites, a number of amendments have been made within the allocation text. The first includes a recognition that reconfiguration of retail floorspace with some expansion is necessary, as to continue to compliment the existing offer whilst encouraging investment opportunities. The second acknowledges that retail change isn’t the only factor in this site’s success, and introduces more emphasis on public realm and design considerations (including heritage), given the site’s status within an important town centre location as well as the need to ensure integration beyond that of just the ‘physical’, with the LLDC area. The option to include reference to the night-time economy and cultural uses has not been taken, given the reference made to this with regard to the town centre within the J policies of the Local Plan (see Jobs Options Appraisal for further discussion).</td>
<td>Point 1 below, together with additional public realm, heritage and retail considerations.</td>
</tr>
<tr>
<td>Carpenters District</td>
<td>The site now falls within the LLDC boundary and is no longer within the remit of Newham’s Local Plan.</td>
<td>Remove allocation</td>
</tr>
<tr>
<td>Sugar House Lane, Three Mills</td>
<td>The site now falls within the LLDC boundary and is no longer within the remit of Newham’s Local Plan.</td>
<td>Remove allocation</td>
</tr>
</tbody>
</table>
| S08 – Thames Wharf | Duty to co-operate partners including the GLA and PLA have been supportive of the Council’s aspiration for wharves consolidation. There is significant common ground between the preferences outlined at I&O stage and the PLA’s own work; preferring wharf activity to be consolidated at Peruvian and safeguarding extended to cover the currently non-safeguarded but active Royal Primrose Works wharf, with Thames, Sunshine and Manhattan wharves released (discussed further within the Jobs and Transport sections of the Options Appraisal). The GLA is supportive of consolidation, and discussions are ongoing to reach a common approach in light of the emerging Safeguarded Wharves Review. Businesses wishing to expand or consolidate in the area.

In addition to wharf consolidation considerations, it is essential that the Managed Release of SIL is clearly defined in the allocation, in order to achieve the site’s aspirations.

The Lea River Park vision identified a beneficial bridge link between Instone Wharf and Trinity Buoy Wharf, the proposal to include specification of this connection received positive feedback from the landowner (GLA) at I&O stage. Any Leamouth crossings would require PLA consent and they have indicated at I&O stage that no appropriate designs have been brought forward for consideration to date, however the allocation can flag the strategic aspiration with design and impact considered through the development management process. Amendments generally have sought to ensure greater connectivity and integration of the site with the wider area, including the adjacent strategic site, riverside, town centres and DLR stations.

Engagement with Pupil Place Planning has identified a requirement for a school on site this is included in the allocation policy and sites schedule. Viability assessment of the proposed allocation shows it to be deliverable. |
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<tr>
<td>S09 – Pudding Mill</td>
<td>The site now falls within the LLDC boundary and is no longer within the remit of the Council’s remit</td>
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Point 2 below, include more specific references to various connectivity improvements needed, wharf consolidation, managed SIL release and new community uses.
<table>
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<tr>
<th>Lane</th>
<th>of Newham’s Local Plan.</th>
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<tr>
<td>S10 – Abbey Mills</td>
<td>The I&amp;O proposed an extension to the boundary to include the area of LMUA9 (Canning Road West) that sits adjacent to S10, developed through permitted development for residential. Given current activity on the LMUA9 and constraints that limit delivery on the non-strategic site from facilitating development on the S10, this option will not be taken forward. Integration between the two sites will instead be secured through general application of other policies of the framework in relation to neighbourliness and connectivity. A response from the development industry at I&amp;O stage expressed a preference for LIL8 to the north of S10 to be drawn into the boundary. Whilst PD rights have seen residential uses emerge here, it is considerably detached from S10 by the Greenway, and its character remains constrained by remaining industrial uses to the north, (which evidence confirms are viable). As such this is not considered to be an appropriate approach. Further discussion on LMUA9 and LIL8 can be found within the Jobs section of the OA.</td>
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<td>Do not carry forward option 3 below. Retain existing boundary and allocation.</td>
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| S11 – Parcelforce | Currently the site (not including the proposed extension) is subject to a live application for a high density, high rise mixed use scheme. Beyond viability constraints, the site’s intensity of use has been in part justified by the existence of open green space to the west, the proposed extension site - former Bromley by Bow Gasworks - that still comprises 7 of the original 9 gasholders (all subject to Grade II Listing) and Lea River Park. However, whilst the site may be deemed as largely open space, it is generally inaccessible, contaminated and structurally insecure. In order for this area to enable the delivery of the strategic site, it is imperative that it is integrated and improved, As the extensive constraints of the existing site render any green space investment unviable without further enabling development, it follows that an extension of the site allocation will allow for this whilst also ensuring a comprehensive approach to the area as a whole. The proposal to extend the |
|  | Point 4 below together with further emphasis on connections to areas beyond the site and including emphasis on the protected gasholders. |
existing site allocation received both support (local residents) and objection (land owner/developer) at I&O stage, though objections favoured the options of a separate allocation for the gasholders over an extension to the existing S11. Whilst it is appreciated that development here is likely to come forward as part of a separate scheme, as the existing allocation is yet to be consented and delivery of the site remains some way off and single extended allocation will ensure that development is considered in the round - allowing for flexibility to changes in context - the rationale for extending the existing site allocation, as opposed to introducing a new strategic, is clear.

A second extension proposed at I&O stage, to include part of LIL1 which falls within the live application boundary, is also taken forward. This area, through careful masterplanning of employment uses within S11 (as well as open space) to the will assist in buffering the industrial uses of the SIL/ LIL to the south.

In extending the site, the allocation has also been updated to ensure that the protected gasholders are adequately considered/ integrated as part of future redevelopment proposals and includes text to support the delivery of riverside open space – key to the Lea River Park...or Leaway or whatever – and links to the green grid. The importance of the delivery of a Local Centre around West Ham stations, as well as essential connections to areas beyond the site is also maintained and strengthened.

The IIA signposts no major issues, subject to application of relevant mitigation policies and measures as indicated (to be included in site schedule). Growth scenarios indicate that viability is likely to evolve alongside general growth and change occurring from development proposals driving the regeneration of the wider area.

S13 – Manor Road

I&O stage presented no change to the site boundary however it did call for amendments to the site specification to include a central green space, which together with other open space would form green grid links to star park, and

Point 5 below, albeit with removal of the work ‘central’ to the open space
considered design response to land along the railway and pylons. Representations from the EcF and GLA raised concern over the specification for 'central' green space in terms of constraints on site design, as well as the need to (increase building heights and) clarify the design response in relation to railway adjacent land. As such, site allocation wording has been written that continues to express the need for high quality, prominent open space provision that connects to the green grid, rather than making a reference to a preferred location and a specification that railway adjacent land be safeguarded against marginalisation by design, is included. Opportunity has also be taken to recognise that B1 space could be accommodated for on the site, forming a recognised cluster (that provides adequate carrying capacity to support its location) and given the inhospitable cycling environment that Manor Road demonstrates, reference has been made to the need for its improvement as part of redevelopment proposals. Finally, connectivity of the site to its surrounds is essential to its success, thus further emphasis has been placed on this within site allocation text to ensure that the appropriate considerations are made as part any wider masterplan.

The IIA signposts no major issues, subject to application of relevant mitigation policies and measures as indicated (to be included in site schedule).

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<tr>
<th>S14 – Canning Town Central</th>
<th>Aside from a clarification that the site’s location within the town centre boundary renders town centre uses appropriate here, notwithstanding the inclusion of indicative building heights, the allocation remains unchanged. The site at this stage is largely consented with delivery underway.</th>
<th>Amended with TC clarification point.</th>
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<tr>
<td>S15 – Canning Town East</td>
<td>As the eastern portion of the site comprising of Keir Hardie school and residential has been recently built out, the option to exclude this area (removing reference to the completed school) has been taken. No responses on the site were received at I&amp;O stage and IIA signposts no major issues, subject to application of relevant mitigation policies and measures as indicated (to be included in site schedule). That said, the requirements, together with greater emphasis on necessary connections, business space stipulations and cycling considerations.</td>
<td>Point 6 below, together with increased emphasis on heritage considerations.</td>
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opportunity to make specific reference to the need to consider the listed church (Chapel of St George and St Helena) as part of redevelopment has been included within the site allocation text, to acknowledge its significance within the area.

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<tr>
<th>Location</th>
<th>Description</th>
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<tbody>
<tr>
<td>S16 – Silvertown Way East</td>
<td>Notwithstanding the inclusion of indicative heights, no amendment was proposed within the Issues and Options however the boundary has been drawn in to reflect build out of the northern portion of the site.</td>
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<tr>
<td>S17 – Silvertown Way West</td>
<td>Notwithstanding the inclusion of indicative heights, no amendment was proposed within Issues and Options document.</td>
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<tr>
<td>S18 – Limmo</td>
<td>With the delivery of Crossrail in 2018/19, this site is expected to be available for development in the near future. TfL has recently improved the PTAL of the site by opening up access to Canning Town station. Engagement with TfL has also identified the potential to redevelop the bus station within the plan period, subject to further feasibility work. This would likely come forward as a separate proposal to the Limmo Peninsula itself but given the essential link between these locations (i.e. to unlock the potential of the peninsula) the site boundary will be extended to cover the whole of the station and ensure scheme integration. This in itself provides the opportunity for the site to deliver some town centre uses and the site allocation has been updated to reflect this. Lea River Park aspirations for the site remain the same, while the site is not a 'terminus' it is a significant part of the vision in terms of open space provision, development should also explore options for enhancing the Leaway route. The extension of the site to include Canning Town station and bus station will also bring in existing green space owned by TfL, benefitting green grid / green chain connectivity objectives. Representations at I&amp;O stage suggested the mix of uses could include higher</td>
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Point 7 below, plus a boundary extension over the station, and SINC (remaining peninsula space to the south, between S18 and S08). |
education, however Newham is already well served by UEL and no need for increased higher education capacity has been identified (given the competition for land use in an urban London borough like Newham, land use is generally only allocated according to identified – i.e. evidenced – needs). Moreover, there are significant constraints impacting the site, including the need for connectivity improvements and the requirements for significant open space provision, an allocation of part of the site for education uses would likely render it undeliverable or push residential densities to unacceptable levels. The preferred mix of uses will be retained along with the new details related to the inclusion of Canning Town station.

Opportunity has also been taken to ensure that the site is adequately connected to its surrounds, particularly as an important gateway to the town centre.

<p>| S19 – Albert Basin | Housing-led development is under way as part of several permissions on the site: Great Eastern Quays (12/01881/OUT), Atlantis Avenue (12/01576/FUL) and Gallions Reach (14/00664/OUT). Changes proposed at I&amp;O stage reflect the transfer of the northern parcels of SIL land to a new site allocation at Beckton Riverside (see the Proposed Strategic Sites OA for further discussion on this point). The site allocation text is updated to reflect this, together with necessary additions to consider connections to the new Beckton Riverside site and the need to ensure public access to the river. | Retract boundary to exclude the area incorporated into new allocation at Beckton Riverside, and include reference to the need to connect to the site and provide public access to the river. |
| S21 – Silvertown Quays | Notwithstanding the inclusion of indicative heights, no changes were proposed at Issues and Options stage. However, whilst the site benefits from an extant permission (14/01605/OUT) no development activity has commenced on site to date, thus the opportunity has been taken to highlight the necessary strategic connection to the ExCel Centre required in this location (already identified by a land bridge on the existing Policies Map 2016). | Amendment to incorporate the need for connections across the dock. |</p>
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<tr>
<th>S22 – Minoco Wharf</th>
<th>The delivery of a housing-led mixed use scheme across the vast majority of the site (11/00856/OUT) is well underway. Changes proposed at I&amp;O stage reflect the transfer of the north western parcel of land (that is not part of the site’s consent) to a new site allocation at Lyle Park West (see the Proposed Strategic Sites OA for further discussion on this point). A comment received at I&amp;O stage has highlighted support for the continued allocation of the strategic site, with the proposed amendment.</th>
<th>Retract the S22 boundary to Bradfield Road, as part of the Lyle Park West (see Proposed Strategic Sites OA).</th>
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<tr>
<td>S24 – Woodgrange Road</td>
<td>Notwithstanding the inclusion of indicative heights, no amendment was proposed within Issues and Options document. Development interest, inclusive of an extant planning permission, indicates that the site is likely to come forward in the short term, therefore S24 remains an allocation within the Local Plan. An amendment to the allocation text to include reference to arts and culture however, has been made to reflect its town centre location, and increased emphasis on these uses included within the J policies.</td>
<td>Amendment to incorporate reference to aspirations for arts and cultural uses within the town centre.</td>
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<tr>
<td>S25 – East Ham Market</td>
<td>Notwithstanding the inclusion of indicative heights, no amendment was proposed within Issues and Options document. Development interest indicates that the site (at least in part) is likely to come forward in the short/medium term and its allocation remains relevant to the realisation of wider East Ham town centre aims. That said, the opportunity has been taken to amend site allocation text to ensure that any redevelopment proposals adequately consider enhancements to Ron Leighton Way, as well as connectivity through the site, providing through-routes that allow for increased movement from east to west.</td>
<td>Amendment to require greater connectivity and main road enhancements.</td>
</tr>
<tr>
<td>S26 – East Ham Town Hall Campus</td>
<td>Notwithstanding the addition of indicative building heights, no amendment was proposed within Issues and Options; the strategic importance of the site for regeneration in East Ham justifies continued allocation. Acknowledging the importance of the heritage assets in this location, the opportunity has been taken to make reference to the need for sensitivity in relation to heights</td>
<td>Reference to heritage included in site allocation text.</td>
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(discussed within the Tall Buildings Evidence base) important heritage assets. Development interest indicates that the site (at least in part) is likely to come forward in the short/medium term.

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<tr>
<th>S27 – Queens Market</th>
<th>An extended boundary, to include the adjacent car park and Harmara Ghar development as proposed at I&amp;O stage, could significantly improve the site’s potential, helping to bring forward integrated development that supports wider regeneration objectives for the area. Comments from community group the Friends of Queens Market (FQM) raised concerns at I&amp;O stage about the potential loss of the market or any displacement effect that redevelopment might have on the existing community. Acknowledging the market’s important socio-economic function, amendments to the allocation place more emphasis on the market’s role (as a meeting place for the local community) in any site redevelopment plans, both in terms of retaining a viable operation, as well as ensuring that its location provides a central focus to any wider scheme. As such, its loss would not be supported by policy. FQM also oppose any increased density in the area, noting the pressure that this will place on surrounding infrastructure and parking. The site’s potential benefit – including delivering more housing to meet need - has long been accepted since its adoption in the 2012 Core Strategy. Density proposals are made in line with existing planning policies, justified by up to date evidence. Moreover redevelopment through mitigating its own impacts will ensure much needed area investment generally, benefiting supporting/surrounding infrastructure as part of good growth and in line with the IDP. Finally, a comprehensive redevelopment presents the opportunity to incorporate other uses for the benefit of the community, including healthcare floorspace to meet the NCCG’s identified need, whilst improving the poor quality environment that currently blights the site.</th>
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<td>Point 10 below, together with mention of the site’s relationship to the wider town centre as well as its community role.</td>
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With regards to the extension of the allocation to include Hamara Ghar, opposition from FGM to any demolition of the existing building (currently providing older persons accommodation) was also received. Existing policies of the framework however safeguard residential floorspace from net loss.

The IIA signposts no major issues, subject to application of relevant mitigation policies and measures as indicated (to be included in site schedule) and instead highlights significant positive impacts on delivering housing and community uses that meet need and that will incorporate enhanced design. Scenario testing reveals that viability can be achieved (particularly when incorporating growth scenarios).

Finally, public support was demonstrated for the allocation during consultation at the Newham Major’s Show in both 2016 and 2017, with local residents recognising the need for renewal, density (to increase housing supply) as well as the importance of the site to the town centre’s health. As such, the importance of the site’s redevelopment continues to be promoted by the Council, for its role in achieving wider area aspirations.

| S28 – Custom House/Freemasons | Notwithstanding the inclusion of indicative heights, no amendment was proposed within Issues and Options document. However the decision to extend the boundary to incorporate an existing hotel development to the South has been made to ensure integrated and comprehensive redevelopment of the wider area.

As part of the Canning Town regeneration programme (see policy S4), options for the site’s redevelopment are in train. |
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<td>S29 – Plaistow North</td>
<td>The option proposed at I&amp;O stage to extend the boundary of the site to include the adjacent related HSG14 site and the station is furthered by an additional extension to the east along Plaistow Road/ High Street. The</td>
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<td>Point 12 below, as well as an additional extension along Plaistow Road/ High</td>
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extension compliments the aspirations of the site in particular acknowledging increased scope for the new Local Centre, reflecting recent development interests in the area, including emerging and extant planning permissions. Although TfL has confirmed a lack of intent to redevelop Plaistow Station within the lifetime of the Plan, this does not impact the deliverability of the strategic allocation, as is evident from development activity here (which will still need to account for the stations position within the site).

I&O consultation has highlighted some concern from residents regarding the appropriateness of (high density), car free development, and whether sufficient infrastructure and green space will be provided to cater for increased population growth when there are existing pressures. However, the high PTAL rating and greenway connections, coupled with increasing modal shift away from car use justifies the promotion of car-free development (as per the NPPF and London Plan) and new development in this area will continue to be expected to provide both retail and community floorspace to serve the needs of the local area, as well as make provision for some open space and public realm improvements.

| S30 – Royal Victoria West | Development of the strategic site has been piecemeal to date, in part due to complex land ownership, but also because of the dominant, fracturing effect of the road network (Tidal Basin Road, Seagull Lane, Siemens Brothers Way), however development will continue to intensify, making the best use of land.

Emerging and recently delivered schemes have all been for towers of 20+ storeys, each providing limited open space while intensifying the local concentration of residents and thus prospective users of existing spaces. The location serves to link the Docks to the Leaway and, in future, the Lea River Park – a series of connected green spaces stretching up the River Lea and connecting the Thames / Docks to the Queen Elizabeth Park and Lea Valley Regional Park beyond. Given this strategic aspiration, the lack of green space |

| Street to the east of HSG14. | |
in the immediate area, and the recent increase in high density towers, the existing green space within S30 is vitally important. Moreover, given the currently uncertain future of the Siemens building (as per consultation feedback) it is of particular importance to safeguard the space in planning terms. While the proposed designation is flexible enough to allow some reconfiguration of the space in accordance with future development needs (adjustment of pathways / boundaries etc.) its position adjacent to the water is essential to its quality, given the visibility, outlook and accessibility this provides. As such, the green space designation is considered to be in keeping with and complementary to the aspirations for the site expressed in the Core Strategy: notably leisure uses, public realm improvements, enhanced pedestrian & cycle links, active water space. Comments regarding heights specification are addressed by the evidence base. Given the strategic importance of the Lea River Park, enhanced specification will be added, highlighting the importance of improving links to key locations.

| S31 – Royal Albert North | Notwithstanding the inclusion of indicative heights, no change was proposed at Issues and Options stage. A large proportion of the site is consented (14/00618/OUT) with phase 1 under construction. Reference to high tech manufacturing and research has been deleted from the site allocation text, as is covered by policy relating to the employment hub in this area (see Jobs policies). |
| Update to the site allocation text to remove specific reference to high tech manufacturing and research development. |

**Policy Amendments**

1. **S05**: Draw in the site at the western boundary to match the extent of the LLDC boundary. Add reference to the night-time economy and cultural quarter.

2. **S08**: Specify connection across the River Lea (as per Lea River Park vision) and creation of new local centre around DLR.
3. S10: – Include Channelsea House (currently within LMUA 9) within the boundary.

4. S11: Include gasholders and part of LIL1 (to the south) with clearer specification regarding expected open space delivery and future gasholders.

5. S13: Amend specification to reflect expectation of a high quality central green square as well as other open spaces and green grid links to Star Park and an appropriate design response for land alongside the railway and pylons.

6. S15: Re-focus to exclude ‘Area 3’ due to build out and express a greater ambition for open space provision within the specification.

7. S18: Clarify that it is not the terminus of the Lea River Park but a significant public open space is expected and give clearer specification regarding connections.

8. S27: Expand boundary to include the adjacent car park and Hamara Ghar building, adjust specification to be clear that a viable market should be made more prominent on the site as part of a mixed use development (as presently specified), and densities should reflect the prime location next to an Underground Station, facilitating step free access if possible.

9. S30: Identify as the terminus to the Lea River Park (with associated green infrastructure amendments) and specify the importance of walking and cycling connections to Tower Hamlets and the station.

10. S29: Extend boundary to include DSPDPD site HSG14 London Road Car Park.