5.1 Economic Growth and Job Growth: Are the forecast job growth figures for the Borough realistic?

It is expected that Newham will see significant growth over the plan period. A key objective (policy S1) of the Plan is to realise the potential and support the borough’s economic strengths to enable the delivery of around 60,000\(^1\) jobs between 2018 and 2033. This is a GLA Economics forecast (2017) which combines trend-based and capacity-related data\(^2\). The GLA borough level employment forecasts identify that between 2016-2031 there will be an increase in 57,000 jobs in the borough. Factoring in LBN’s self-employment figures of an increase in 2,000 self employed jobs over this period and the 15 year plan period (2018 to 2033) the 60,000 figure is considered to be an appropriate approximation aligned with this forecast for the borough as a whole (i.e. including the LLDC area).

Whilst ambitious, the forecasts reflect strong performance arising from regeneration and economic development activity in recent years. The ELR Part 2 (EB11, para 2.13) notes that employee jobs in 2015 were a third higher than in 2010, mirroring a similar significant increase in economic activity. Most of this growth has occurred in non B1 sectors, notably retail, healthcare and education. Significant numbers of these jobs may be seen to relate to overall population increase linked to housing growth therefore, as well as developments of sub-regional importance such as Stratford City retail and the International Quarter Office which continue to grow creating their own momentum. Intensification (increasing productivity) is another trend of relevance, which is arguably more deliverable than new floorspace.

There is also a significant driver from projected capacity, including large amounts with planning consent with approximately 280,750 sqm (gross) of B1 floorspace (of which 272,457 sqm is B1a) in the pipeline on major permissions (e.g. the ABP office development in the Royal Docks) alongside a further 7,000 sqm of B2/B8 floorspace. Much of this is anticipated to tap into new investment markets and contribute to the step change in accommodation and infrastructure, (e.g. Crossrail, DLR capacity) coupled with Enterprise Zone incentives in some cases, needed to change the historic jobs growth trajectory. However, the GLA notes that risks in this coming to fruition (particularly around untested markets which may have implications for the pace at which additional capacity would be taken up) are the reason for tempering capacity-based with trend based forecasts\(^3\). Nonetheless it is noted that 73,858 sq m of office space is presently under construction on 1 site.

Given the extent of ambition, Policy J1:3 is significantly influenced by a concern to ensure deliverability through the Employment Strategy requirement, which references appropriate phasing and activation, market testing, and close work with the Council’s employment intermediary, Workplace. It is also concerned to protect and nurture the potential of the

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\(^1\) GLA, 2017 Employment Projections by Borough (2004-2050)
\(^2\) GLA Economics (2017) London Labour Market Projections 2017
\(^3\) Ibid. p. 6 & p. 8
existing business base to grow, hence for instance, concern for
neighbourliness and ‘agent of change’ principles.

Whilst the evidence highlights Newham economic forecasts to be strong
therefore, the jobs and growth figures add context and associated policy
requirements to support the ambitions of the economic strategy and
associated infrastructure requirements. Nonetheless, it is noted that other
than setting out the extent of ambition and opportunity to which the Jobs
policies respond, the jobs forecasts are not the primary driver of any
policy, other than presenting a ‘worst case’ scenario for transport
planning, with employment land requirements for instance, factoring
numerous other variables, not least because traditional employment land
is not necessarily a big producer of jobs compared to town centres and
other employment hubs (ELR Part 2, EB11,).

Since the Plan was submitted however, Local London, a coalition of 8 east
London based authorities of which the borough is part, has published a
Growth Business Plan4 (EB21) based on modelling work by Oxford
Economics. This again notes the exceptionally strong recent performance
of Newham compared to other local boroughs, which is expected to
continue going forward, however its forecast for the period 2017-2030 is
for around 34,000 jobs (including the 4,900 self employed jobs). They
note that this lower forecast is because they take a more demand-based
approach than the GLA suggesting this is based on experience of build out
and historic performance continuing to affect future growth5. Given the
divergence in numbers, it is considered appropriate to introduce a minor
amendment to refer to a jobs forecast range of 39,000 to 60,000 jobs
over the plan period, based on the Oxford Economics figure, plus an uplift
to reflect a 15 year plan period. This continues to be ambitious and much
higher than other local boroughs, which Policy J1 amongst other policies
(e.g. INF5) as discussed above, seeks to help realise, maximising job
creation. However, as explained above, the inclusion of these figures is
largely to provide a statement of the possible parameters of growth rather
than being a key policy determinant.

5.2 Future Employment Development:

(i) Is the economic strategy in policy J1 sufficient to meet
Newham’s employment needs over the plan period? Does it
accord with the requirements in the Framework for clear policies
on what will be permitted and where (paragraph 154)?

The Council considers that the strategy set out in J1 enables the
realisation of opportunity by promoting viable employment locations,
seeking to retain and attract investment from diverse growth sectors and
build on sectoral and locational strengths and opportunities across the
Borough, reflecting technical and engagement evidence (EB10/11, EB01).
This is also reflected in the IIA (SD04) in relation to objectives concerning
economic growth wider objectives including building economic capacity,
personal resilience and achieving Convergence through development,

4 Local London Growth Business Plan: The Evidence (April 2018)
5 Ibid. Appendix 1
against which the policy performs positively. In doing so it recognises the challenges in ensuring promised jobs density-based projections are realised (in the technical criteria) and the balancing acts needed to ensure such employment opportunities are sustainable and fit with the broader spatial strategy and strategic objectives of the plan (in the strategic principles and spatial strategy).

The policy sets out a spatial strategy for 5 different economic sectors (J1:2b-f), clearly referencing more detailed coverage of some issues in related policies such as J2, whilst also signposting the potential of the Arc of Opportunity and employment hubs with particular sectoral strengths as ‘areas of search’ for new or existing businesses looking for new premises. In turn, the technical criteria set out various over-arching tests (applicable to broader classes of employment-generating development) to ensure that the strategic principles are met, notably that promised jobs come to fruition contributing to convergence, and new development does not conflict with existing viable business operation creating successful mixed use places and balancing different needs (as per J1:1b). In turn the strategic principles provide over-arching criteria to inform the assessment of applications unanticipated by the more detailed criteria, perhaps due to their particular combination of uses.

The policy emphasises a demand-led approach however, in the detail of phasing, mix, scale and tenure of major development on particular sites (J1:3e.i&ii). It signposts the ELR Part 2 as one source of borough-wide evidence on demand, but expects as per paragraph 6.84 that developers also do their own research in the context of plans for a specific site. This is important as specific locations and development propositions will have different market appeal and this may vary over time, and in some cases (e.g. cultural and creative) require a certain amount of cultivation/nurture. A further minor amendment is proposed to clarify that the Council will advise on this through the pre-application advice process.

J1 should additionally however be read alongside the other J policies which are cross referenced in J1 accordingly, as these all have a role in meeting economic needs set out in J1 including the management of a sufficient supply of employment land (J2) and a more detailed skills and access to employment agenda (J3). Indeed, J1’s strategic principles (J1:1a&b) further acknowledge the role of sufficient infrastructure, particularly transport infrastructure (policies INF1-9) and place-making (policies SP1-9 & spatial policies S1-6) which promote high quality economic environments and help to realise the full range of economic opportunity; these are again cross referenced as necessary in the policy.

Therefore, the policy strikes a reasonable balance between prescription and flexibility, and provides the appropriate degree of clarity to be effective. As per the implementation paragraphs, it is clear that the realisation of employment and wider sustainable development objectives relies on development management in the broader sense, utilising the plan in the round and working alongside and together with partner organisations (such as the Council’s jobs brokerage Workplace and local business groups).
(ii) Should the re-designation of industrial land to mixed use have a more precise expectation of uses, and in particular retention of employment space (perhaps by percentage)?

Is there a danger of such schemes becoming residential-led to the extent that other uses are priced out?

In pursuit of a genuinely mixed use borough, the Council deploys a range of policy tools including the Managed Release of employment land, and various types of employment designations, together with Strategic Site allocations. In doing so, SIL (Strategic Industrial Location land) which continues to be protected quantitatively and qualitatively meets demand projections for SIL- uses going forward, (including an allowance for displacement and market choice6) and that which is released from SIL designation or local designations (e.g. via transfer from LIL to LMUA) is no longer needed to meet such needs, in line with paragraph 22 of the NPPF

Much of this land is in fact vacant, though vacancy also provides for capacity to meet demand in some cases where SIL designation is retained (e.g. Central Thameside West, North Woolwich Gateway and Beckton Riverside). Nonetheless, the Managed Release and Transition criteria (J2:3b) emphasise that where existing businesses are affected by this process they should be re-accommodated within the site, or have their re-location supported, no matter the extent of their lease interest. Importantly, the policy has been revised through the Plan Review to specify that reasonable endeavours to do so should ensure a suitable alternative site is secured, with appropriate transitional arrangements, and be cognisant of the local and regional economic role of the business.

As the implementation section explains, this requires an understanding of associated locational requirements, which in many cases requires continued access to the local market. Proposed Post-Submission Minor Amendments further clarify that economic role should be considered in relation to whether the business has a role in servicing wider economic activity, performs a strategic infrastructure role (e.g. waste management) or contributes to a particular cluster, or is otherwise unique, as well as the quantum of employment involved. The result of such reasonable endeavours may well be therefore the need to re-provide floorspace for those businesses within the redevelopment if alternative sites meeting locational requirements cannot be found. This is accounted for in the site allocations through in some cases, continued SIL designation, and/or the requirement for buffering of remaining neighbouring SIL with employment uses, and/or the potential to utilise employment-generating uses in a mixed use scheme to address flood risk management - as a less vulnerable use they can often be incorporated at ground floor, also thereby providing for activation. This opportunity is also noted in a Proposed Post Submission Minor Amendment.

In these instances, the relevant employment-generating floorspace provided in a mixed use scheme will be determined by those displaced business requirements, (though the move may present an opportunity to

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6 ELR Part 2 (para 3.61)
intensify) and other market testing to ensure that as per J1, the space will deliver on employment growth promises, as well as the design function it is required to play as part of the wider site masterplan. Agent of change and neighbourliness criteria in J1 and J2 further secure proactive consideration of how to achieve successful mixed use, rather than the sites becoming residential-led. Moreover, additional employment-generating floorspace will be provided within local/town centre provision and in community facilities on Strategic Sites derived from employment land release, (as per site allocations and infrastructure policies INF5, INF8 & INF9) both of which as noted above, are responsible for significant amounts of employment in the borough. The quantums of this type of floorspace are informed by retail hierarchy benchmarks (see matter 4.3.iv) and again, market testing, together with the iterative approach to community infrastructure/housing capacity testing.

A similarly nuanced approach, which provides for innovation in format is indicated at locations for Managed Intensification (on SIL and LILs) where in some specified circumstances there may be a further opportunity for release (e.g. Beckton Riverside, Silvertown Landing). The policy test here focusses on maintaining functionality and capacity in light of evidenced local and strategic demand for industrial and warehousing space, which is explained further in the implementation section (para 6.93c) with proposed minor amendments providing further clarification.

In turn, LMUAs which are local employment allocations often involving change from previously locally designated employment sites are to be employment-led, which again, with the Managed Transition criteria and the explanation of implementation expectations at paragraph 6.93di and 6.93e & f provides for further contributions to the range of employment-capacity and careful re-provision against the backdrop of release. This specification has recently been successfully defended at appeal [16/04014/NONDET], para 9/10] securing the refusal of a residential-only scheme.

Therefore, the approach to release and mixed use has to be understood against the breadth of employment capacity and safeguarding provided for in policies J2 and J1 and associated site allocations, as it is this broader strategic approach that makes it ‘managed’ and plan-led in the round and across the borough as a whole. Strategic sites bring localised spatial coherence to this. This approach has been operating since 2012, with further safeguards of employment/genuine mixed use progressively added in the Detailed Sites and Policies DPD in 2015, and now through Local Plan Review. These have learned from past ‘over-promising’ on the part of developers, and an excessive focus on projected jobs numbers/’quality’ (favouring risky B1a floorspace which subsequently has become residential) rather than an understanding of economic functionality and deliverability. Against this backdrop is the further context of the need to achieve more with less: gone are the days of the luxury of space, as well as changing industrial and warehousing formats and changing patterns of employment which make compatibility with residential more attainable.
For this reason, we steer clear of ‘planning by numbers’ but seek to encourage outcome-led design innovation and market informed spaces that work long-term through a suite of policies working together. These, through various tests and site allocations centred on the principle of mixed use (as opposed to referring to residential-led) should however ensure that expectations are clearly signalled and factored into land values and scheme viability testing to ensure that employment-generating uses in their various forms are not ‘priced out’. Ongoing monitoring of employment areas and engagement with relevant market expertise (see monitoring sections, J1 & J2) also gives a position of strength from which to promote desired outcomes in the development management process. Equally by being clear that ‘release’ of employment land will only be acceptable in specified locations and in line with managed release criteria should ensure that and remaining SIL (and LIL) has residential hope value removed from it.

5.3 Housing/employment Balance:

(i) How well related are the Plan’s housing provision and the provision of land and sites for jobs within the likely economic context over the plan period?

With the adoption of the Core Strategy in 2012, Newham embraced a mixed use spatial strategy, seeking to balance employment and housing needs, acknowledging one without, or over-emphasised relative to, the other was unsustainable and would fail to tackle issues and opportunities in the round to provide for sustainability (shorter journeys to work) resilience both overall and in particular places (e.g. town centres) and convergence (e.g. via better access to jobs). This was refined by the DSPDPD which sought to elaborate different meanings of the spatial strategy, and better manage transitions to mixed use over time and in particular areas. In turn, Local Plan Review has worked particularly with the issue of hope values interfering with employment land supply, whilst needing to acknowledge trends such as intensification and the need to provide for a diversity of employment spaces as well as housing need. The balance of housing provision and land for employment purposes is addressed from the outset in the set of new objectives (no 3 – p. 10) carried through into the overarching spatial strategy S1.1.c and thence into strategic, spatial and technical aspects of policies (including various site allocations) supporting a genuinely mixed use borough. This is discussed further in the Options Appraisal (SD06) and Engagement evidence base (EB01) plus the IIA (SD04).

Overall therefore, the strategy provides for a balance and a mixing of uses but to different extents in different places. In some areas (e.g. town centres, most strategic sites, LMUAs) there is the expectation of mixed use (vertical or horizontal). In some residential only (e.g. Urban Newham) and some employment only areas (SIL, LIL) transitions should be managed through design specification, physical buffers (e.g. roads, waterways) and managed transition and managed release processes over time (see J2:3a). In many cases however, this means that places of work and places of residence are well related, and generally that they are in closer proximity than before. Physical and transport access to jobs is in
fact introduced as an explicit policy consideration in Policy J3 (including access to transport modes in J3.3.a).

Quantitatively, given Newham’s strategic role in providing for capacity to meet more than its OAN in housing, it has been important to separately evaluate the need for employment land based on demand, given that much employment land is well-suited to housing locationally and yet also remains suitable for employment use. This tempers housing targets therefore, by reducing absolute capacity, avoiding excess employment release and issues of displacement (physical or economic). As with housing however, some capacity-related allowance is made to accommodate regional/Property Market Area demand due to displacement from elsewhere. Moreover, the demand modelling is influenced by trends and projections that are closely related to the growth in housing and residential population, notably growth in warehousing and logistics that increasingly services that population, growth in construction industries, strategic infrastructure servicing residential (utilities, transport, waste) and industries servicing leisure needs (e.g. food and drink, cultural and creative). Retail and town centre capacity assessment and associated provision for new employment-generating development is likewise heavily influenced by population-driven spending growth, as is clearly, employment-generating social infrastructure to meet such need.

Both housing need and employment development is vulnerable to economic change through its impact on market conditions, with sites only likely to be progressed without significant intervention, if market conditions are favourable. The SHLAA plays a key role in identifying the amount of housing capacity taking into account the range of economic, constraints which may influence the potential for identified sites to come forward for housing or mixed-use development over a 24 year period and how this relates to housing capacity assumptions is discussed in Matter 6.1. LBN’s Viability report (EB02, para 1.4) compares a number of sites and development typologies expected to come forward in the plan period reflecting housing and commercial property markets, through sensitivity analysis which applies growth to sales values and with an understanding of the viability of potential development sites both in today’s terms but also in the future.

The housing and job targets set out in the plan have been developed to be in conformity with the London Plan and GLA and LBN Evidence on housing and economic needs for Newham. Supporting evidence to the Local Plan demonstrated that in the current context, and with reasonable foresight, the plans housing and economic policies are deliverable. However, it is recognised that any target or policy is vulnerable to shift in economic context, particularly where a change in context may undermine delivery or viability.

To manage this we will monitor the delivery of the targets and also new evidence or policy as it emerges from the Mayor of London, GLA or the Borough. The GLA prepares frequent updates of key evidence such as housing need (the London SHMA 2017), the need for offices (London

7 London SHLAA (2017)
Office Policy Review) and the need for industrial land (Industrial Land Demand Study). This, alongside LBN’s own economic evidence base will inform future decisions to review the plan in accordance with our statutory duty.

Policies J1-3 clearly seeks to address the key economic issues facing the area, setting out an economic vision and strategy which positively and proactively attempts to enable sustainable economic growth. In particular J1 sets out a demand led portrait of the borough seeking to attract and retain investment from growth sectors, J2 secures sufficient protection of the existing economic platform with a sufficient reservoir of employment land by putting the economic role at the heart of development, and J3 which seeks to build economic capacity by ensuring the skills and jobs are sustained/promoted over the plan period. The Employment Land Review Part 2 (EB11) which informed the economic policies sets out an assessment with reasonable foresight of future demand for employment space over the plan period and informs how this can be met in line with national guidance.

Whilst the plan acknowledges that some new development and change is necessary in order to meet the need for new homes and jobs, the plan promotes a genuine mix of uses to achieve this. In ensuring that the economic role is fully understood, policies J1-J3 seek proactive measures to ensure economic needs are understood and responded to. In particular policy J1 promotes viable and demand led development across the Borough, J2 supports engagement with businesses to understand demands/requirements and J3 maximises economic opportunities from development through the Council’s brokerage Workplace and will ensure sufficient infrastructure to support employment.

As such the policies are sufficiently flexible whilst they all involve direct liaison/engagement to understand future economic needs supported by demand-led evidence (and subsequent updates) reflecting market conditions to inform future economic requirements and decisions across the Borough.

(ii) Should the Council aim to achieve a measure of self-containment by the end of the plan period, and if so, should this be included in the Plan?

National policy and Guidance does not require Authorities to plan for self-containment. Instead the NPPF (and PPG) requires plan makers to consider addressing housing and economic needs at the ‘market area’ geography. Newham in common with most London boroughs has a low degree of containment, (around 33%) demonstrating that it falls firmly within the London Functional Economic Market Area\(^8\) and the degree of self-containment (or lack of) is a strategic matter addressed in the London Plan.

However, the Council has considered its links with other Councils when addressing its economic needs. At the Borough level the ELR part 2

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\(^8\) ELR Part 2: Chapter 2 para 2.49
(EB11) looked at the relationship between the Borough and neighbouring boroughs. Whilst the borough has extensive commuting outflows, the greatest imbalances were between Newham and the Central Activity Zone (CAZ) boroughs with three (Westminster, Tower Hamlets and Camden) driving the majority of the (outward) imbalance. The data shows that commuting trends to be short distance crossing one or two Borough boundaries and also where the public transport network facilitates this commuting. It is considered the lack of self-containment is not an issue the plan would prioritise, as strong outflows generally reflects the significance of the CAZ as a policy area in which the London Plan seeks to consolidate economic activity.

It is undoubtedly therefore an uphill task to increase self-containment given the primacy of the Central Activities Zone, (CAZ) however there are some positive trends which the plan continues to build on. Firstly, Stratford as CAZ overspill which starts to acknowledge that the CAZ itself hasn’t got unlimited growth potential; this is also mirrored in the growth of Stratford as a Metropolitan and potentially International centre, again reflecting a more polycentric growth model. Meanwhile in the Royal Docks, the first stage of the ABP development gives greater confidence that new investment sources (in this case Chinese investment) can help foster new spatial patterns of demand outside of traditional office areas. Secondly employee jobs have increased in parallel with increased economic activity\(^9\), demonstrating the role of parallel physical and economic regeneration activity in matching residents to new job opportunities arising from new development. In addition, protecting a reservoir of industrial land (and recently increases in employment in these sectors) to help meet qualitative need for a range of employment opportunities for residents provides for a type of employment unlikely to be accommodated within the CAZ, which is largely dominated by office-based employment.

Going forward, the Council continues to plan for a mixed use borough and convergence, given that this helps to address a numerous concerns including congestion (on roads and rail networks/stations) and air quality, multiple deprivation and spatial inequality, the scope for active travel, levels of obesity, the need for more intense use of land, and generally the potential for localised virtuous circles of growth. Strategic transport policies seek to ensure that investment in the transport network reflects population growth and residents can continue to access employment via sustainable means as well as housing sites ensuring access to employment whether it be within the LBN boundary or beyond. These are felt to be more relevant objectives than containment per se, which is made more difficult in the context of planning for strategic housing need due to the capacity-derived approach to the housing requirement. However, it may also be possible for self containment to be addressed at the same time, suggesting it the existing degree of containment should at the very least be maintained if not increased.

(iii) Is there a balance between housing provision and maintaining an adequate supply of employment land?

\(^9\) ELR Part 2 para 2.13
5.4 Providing for Efficient Use of Employment Land:

(i) Is policy J2 justified in its protection of Strategic Industrial Locations (SIL) / employment land and in its managed release of land to other uses, e.g. through its ‘agent of change’ principles in order to achieve an effective buffered transition between residential and traditional industrial uses?

The justification of the protection of the quantum SIL/employment land and its managed release, including specification regarding future employment uses is dealt with in relation to 5.2i&ii and 5.3i above. This response therefore focuses on the spatial element and the agent of change principle as a part of the managed release strategy.

Paragraphs 14,20,22 of the NPPF advises that LPAs should plan positively to meet the development needs (including businesses) of their area. As well as quantitatively meeting employment land needs, it is important that they are met qualitatively. The ELR Part 1 (EB 10) sets out how qualitative and spatial considerations, such as critical mass, access and context, have informed management recommendations which were been carried through to spatial options evaluated in the Options Appraisal (SD06) in light of demand analysis (ELR Part 2 EB11). In doing so, the most appropriate land for designation and de-designation/release has been identified, including that with further potential opportunity for intensification and release.

As a consequence however, a spatial pattern emerges, of SIL land, particularly in the Royal Docks being interspersed, or at least right up against land identified for mixed use redevelopment opportunity where residential uses will often be prominent. A new development need arises therefore, for existing business to be protected from impacts caused by new non-industrial neighbours, hence the specification of masterplanned buffers and Agent of Change principles.

Is the onus on developers of released SIL to accommodate their designs to pre-existing industrial neighbours, rather than vice versa, (which is my understanding of para 3.a), justified and would this policy be effective in achieving neighbourliness and eliminating complaints from noise-sensitive developments? Does this policy set out an effective template for overcoming conflict between neighbouring uses, or is it overly onerous and restrictive?

As discussed above, the broad spatial strategy of the plan is of a mixed use borough, and of optimising development: Newham is no longer an outer London borough with the luxury of space, and all users of that space need to work harder to achieve compatibility. So reducing spatial impacts of any development/use/activity that emanate beyond the site is a key issue hence the over-arching neighbourliness policy in SP8. In turn, whilst J2 places requirements on release sites, J1 acknowledges that new employment space also needs to work harder to achieve compatibility with residential, (echoed also in INF4 in respect of utilities, and INF1 in respect
of strategic transport uses) although in part this will occur anyway due to the nature of modern industrial floorspace, influenced inter alia by the changing nature of industry and other environmental regulation. Indeed, this is to some extent being seen on existing sites, with proposals for enclosure of previously open storage for instance. Enforcement activity has also considerably improved the management of numerous traditional ‘bad neighbour’ sites.

However J2 is particularly concerned to protect existing viable industry that may not be further developing their sites with the opportunity to ‘design in’ measures from the start – i.e. more cost effectively than retrofit - adjacent to newly released housing sites. In this instance, therefore, it is important for the newcomer, who will be benefiting from the uplift in industrial land values, to undertake the mitigation (albeit in some cases this may include bilateral work with their neighbours, potentially paying for some of this retrofit). Importantly, specifying this requirement ‘upfront’ should as per the NPPF requires, enable associated costs to be factored into land deals. Nevertheless, proposed minor amendments clarify that existing uses would still be expected to be operating reasonably and lawfully and to support the trend for greater environmental performance to be specified in the supply chain (e.g. delivery vehicles including shipping) and on site.

While the Agent of Change is stipulated on release sites however, (to be secured by legal agreement or condition as appropriate) the Strategic Site allocations that accompany the release of SIL further specify the arrangement of land uses on the sites to secure physical buffering with for instance, new employment floorspace buffering existing SIL, or the use of natural barriers such as road/tunnel alignments forming a transition to more residential-focused areas of the site. Likewise the Central Thameside West Strategic Site (S07) presents the opportunity to deal with some of the vehicular conflict arising in a mixed use area – with the reactivating/consolidated wharf having the potential to reduce lorry movements, and the potential for new access for industrial sites from the west away from residential development to the east.

Overall therefore, the Agent of Change requirements together with neighbourliness principles set out in J1 and J2 (in line with SP8) and the Strategic Site allocations reflects the challenges presented in securing compatibility of differing land uses to ensure genuine mixed use is achieved. It focuses on ensuring that new development maximises the benefits of modern design (particularly with regard to addressing environmental issues), and encourages masterplanning to achieve neighbourly development and protect the ongoing viable operation of existing commercial uses to support economic growth. In pursuit of a plan-led and managed approach the Agent of Change Principle is justified in that it ensures proactive engagement on these points, early on in the design process at a point when it should be least onerous to do so. It also accords with national policy (NPPF para 123). Therefore, the inclusion of the Agent of Change amounts to a more explicit policy emphasis reflecting the NPPF and adopted Policy SP8, rather than the introduction of an entirely new concept. Given that it works with the broader neighbourliness
principles moreover, it is not overly onerous as it is ‘two way’ (insofar as new employment generating development opportunities arise these too are expected to be conscious of residential neighbours as well as modern environmental standards) and is further supported by masterplanning stipulations.

(ii) In the light of the planned/projected increases in housing numbers in Newham over the plan period (and the accompanying increase in economically active residents), what is the justification for releasing large amounts of employment land?

The approach to employment land designation derives from the approach set out by the London Plan (notably policies 2.17 and 4.4), which highlights the role of Strategic Industrial Locations (SILs) (of pan-London importance) and Locally Significant Industrial Sites (LSIS) in providing reservoirs of existing and potential employment land, as well as important transport, waste and utilities functions. It leaves Local Plans the role of defining appropriate boundaries and more detailed policies. Nonetheless Newham is also identified as having the scope for ‘Managed Release’ of employment land, and in the draft London Plan, ‘Limited Release’ (boroughs with scope for limited release of industrial land in SIL/LSIS designation through a plan-led approach supporting the re-use of surplus land and floorspace for other uses).

The London Borough of Newham undertook an Employment Land Review in 2017 comprised of a qualitative review of the Borough’s existing employment land (EB10) and spatially logical options for its management, alongside a demand study (EB11) assessing quantitative and qualitative needs going forward. Both of these studies and feedback from consultations and engagement informed the appraisal of options (SD06), and the conclusions concerning both the quantum and location of SIL and LIL protection (and conversely, release) and safeguarding measures such as the ‘Agent of Change’ as reflected in Policy J2. These seek to manage the impacts of land use intensification, reflecting current challenges which include stressed industrial land markets, displacement, and the need for contrasting uses to co-exist successfully in closer proximity than before.

Importantly, this local evidence base takes a more nuanced look at vacancy and industrial and warehousing demand in the Newham context, noting that whilst until recently the demand trend was downward, it is now seeing an upturn, further bolstered by displacement from inner London due to excessive rates of industrial land release, (albeit the demand is much less than in the early-mid 20th century due to structural economic change and the drive for greater floorspace productivity). In this context, Newham is particularly well placed to service the CAZ due to its transport connections and relatively cheap land as well as having demand derived from a growing local consumer base (i.e. housing growth) that requires servicing with for instance, delivery of internet bought goods, and associated construction and waste needs.

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10 Hence for example, there is no longer a need for large scale gasworks, and residual gas pressure infrastructure is being designed to be ever smaller.
However, Newham has to plan ‘in the round’ and to meet other needs also, notably housing and community infrastructure, and the fact remains that residential development is an important source of investment in affordable housing and community infrastructure, and in some cases redevelopment of small sites comprising ‘bad neighbour/non-conforming uses’ helps to resolve long term enforcement issues. Along with rising housing densities therefore, intensification of employment areas will be needed, as indeed is starting to come forward with recent proposals for a triple storey warehouse in the Royal Docks. Managed Intensification criteria(J2.3.b.i/ii), is concerned with protecting functionality and capacity as a principle of the strategy ensuring that new proposals address the priority of the borough’s employment land

Nonetheless, employment land is not just SIL and LIL, it also comprises LMUAs, MBOAs, town and local centres and strategic sites, together with a diversity of spaces in wider employment hubs focused around for instance, the hospital, airport, ExCeL centre and out of centre retail. Indeed, the ELR (EB11, Fig 3.2) highlights that jobs growth has been driven by the non B Class Uses (mainly retail, education and health), whilst Office jobs have risen steadily in recent years, neither of which require traditional employment land. The Council recognises the crucial role that all such employment land plays in supporting economic growth through providing opportunities for diverse forms of employment, and in terms of providing opportunities to alleviate pressure on remaining core industrial land whilst maintaining economic capacity.

Therefore, the justification advanced in the plan and accompanying text and OA for the degree of employment land release is qualitative, (as discussed in matter (5.4.ii) quantitative and in line with broader plan objectives. In recognising this, recommendations in the ELR part 2 conclude that whilst the borough should protect viable and well performing industrial land as far as possible, it is accepted that land designations should be regularly reviewed and that the release of poorer performing industrial sites is a key component to support wider regeneration set out in the plan. Whilst release of employment is always subject to conditions set out in policy, the plan-led and managed approach allow for areas of land to meet other needs and wider regeneration purposes in pursuit of a genuine mix of uses and sustainable development.

(iii) What is meant by “rationalisation of safeguarded wharves”? Is this strategy justified in the light of projected growth in seaborne trade through the Port of London?

Reference to “rationalisation or relocation of safeguarded wharves” in policy J2:2g refers to the complicated manoeuvre whereby safeguarded wharves in the Thameside West area will be consolidated onto a single area of multiple wharves: Peruvian Wharf and Royal Primrose Wharf, (on Central Thameside West Strategic Site S07). Peruvian Wharf is an existing safeguarded wharf currently being re-activated; Royal Primrose Wharf will be a new wharf. Together these have the capacity to replace the active safeguarded Thames Wharf, the non-safeguarded active Dock Entrance Wharf (both on Thames Wharf Strategic Site S08) and the safeguarded
Sunshine and Manhattan Wharves (on the Lyle Park West Strategic Site). It also encompasses the additional release of Mayer Parry and Priors Wharves on the River Lea (a further proposed minor amendment provides for this clarification). This process is set out in map form on the map on p.187, in more detail in the spatial policies S3 and S4, associated site allocations and INF1 together with the IDP, the ELR Part 1 (EB10) and recently released GLA consultation draft ‘Safeguarded Wharves Study’\(^{11}\) May 2018 (EB23).

Wharf consolidation is a long-established objective (set out in the Core Strategy) in the Thameside West area which is now much closer to becoming a reality due to joint work between the PLA and GLA, with further impetus being given by the Silvertown Tunnel DCO which requires the land occupied by the wharves on S08. It is also explored in the ELR Part 1 (EB10). It is recognised that these wharves are spaced out across the river frontage with varying degrees of usage. Consolidating these wharves enables a rationalisation of landtake and thereby a reduction of spatial impacts (fewer neighbours) without loss of capacity, supporting the process of plan-led Managed Release of employment land and Managed Intensification. This will free up river frontage to secure mixed use development at a number of Strategic Sites and reduce the extent of buffering required. It also brings benefits in terms of reduced HGV movements, as more wharf functions can be located adjacent to relevant users (notably concrete batching).

Managed Intensification criteria in policy J2:3b, as per the London Plan policy 7.77\(^{12}\) specifies a no net loss of capacity or functionality in relation to those wharves that will be re-located; Managed Release criteria relating to the associated SIL requires transitional arrangements and support for existing businesses (J2:3a). In turn, the spatial policies set out the conditionality of the associated release, tying it to Strategic Site (Lyme Park West and Thames Wharf) development through careful phasing management and design to support neighbourliness and their delivery (see paragraph 5.38). As part of the implementation of the strategy, the policies require early engagement with relevant partners including the PLA and GLA (e.g. paragraph 6.93b) to ensure the process occurs with due regards to operational and safeguarding requirements, though this strategy has already been agreed by them as set out in the DtC statement (SD08) and OA (SD06).

For clarity further explanation of the process is proposed as a minor amendment to paragraph 6.93b of the implementation section of J2 and the wording ‘rationalisation or relocation’ is aligned with policy S3 to refer instead to consolidation; in addition it is proposed that reference to wharf in the Canning Town Riverside area should be made in J2 in line with statements elsewhere in the plan (Canning Town Riverside Site S12, Policy S4 and J2 Map).

\(^{11}\) Safeguarded Wharves Review Consultation Draft, May 2018
\(^{12}\) And Draft London Plan Policy SI15.d which refers to ensuring that the ‘capacity and operability of wharves is retained and where possible expanded’
In the Canning Town area, the Wharves Study: Consultation Draft (EB23) recommends release of both Mayer Parry and Priors Wharf, both located in less favourable locations with identified limitations for navigation for freight handling and with alternative wharves in the NE sub-region with more favourable conditions for activation. Even with their loss, appropriate capacity to meet demand is retained. These are all factors which enable London Plan policy tests (existing and draft) as cross referenced by the Local Plan to be met against an overall strategy of promoting sustainable freight handling and better use of waterways.

Overall, the Wharves Study (consultation draft) concludes in its planning horizon to 2041 that the North East sub region (in which LBN wharves are located) has seen strong growth since 2015 and that this strategy provides appropriate capacity going forward given that this region nonetheless has the greatest over-supply in wharf capacity. Therefore this approach responds to, and better enables the growth in seaborne trade because it should enable wharf demand to be met in a spatially effective way in which re-activation of currently unused capacity is more likely whilst being supportive of ongoing operations requiring wharf access.

(iv) In the light of the requirement in paragraph 22 of the Framework, is the marketing period of at least 12 months prior to the release of land solely to residential use backed by robust evidence and does it accord with national policy

This requirement is backed by evidence of a stressed industrial land market, comprising a lack of sites due to high levels of release, and a lack of available sites due to residential hope value affecting either prices sought or whether sites are even put to the market for their designated use. The evidence comprises (i) the London Industrial Land Demand Study (EB13) which indicates that the rate of industrial land release has far exceeded the benchmark targets set out in 2012 and the local equivalent (ii) the ELR Demand Study (EB11) which is informed by engagement with agents operating in the area, all of whom report a lack of available sites, and businesses as a consequence accepting sub-optimal sites whether in terms of location, lease length or the quality of premises. Both studies also note the significant problems of displacement which is occurring both within Newham and from other more central boroughs which reflects both availability and affordability, particularly for smaller businesses.

In these circumstances, it is important to ensure robust marketing, as part of a plan-led and managed way of employment land release - maintaining an appropriate reservoir of employment land for economic purposes. It is a check that the site has ‘no reasonable prospect’ of use as per the NPPF para 22, the realism brought by the appropriate marketing of sufficient duration to reach a range of potential applicants, including those for whom relocation needs require existing premises, and pricing to allow for viable operation and lease. Notwithstanding this, it should be noted that this test only applies to smaller windfall sites in lawful employment use, not SIL release which is already accepted in principle in defined locations (linked to a Strategic Site allocation) based on demand
and supply calculations as discussed above. This is clarified in a proposed minor amendment.

The approach is moreover consistent with the GLA’s Land for Industry and Transport SPG (September 2012) which at para 4.16/7 recommends that demand is tested through inter alia, demonstration of ‘adequate marketing through commercial agents at a price that reflects market value for industrial use for a reasonable period...and boroughs may...adopt different marketing criteria according to local circumstances’. Indeed, in the draft London Plan, this is now brought into policy in the draft London Plan (para 6.2.6) which suggests at least 12 months as a reasonable benchmark for demand testing at market rates before potential release to residential. It should be noted that a recent Inspectors Report\textsuperscript{13} allowed 2 years as ‘lengthy but not unreasonable in the context of a borough with high levels of occupancy and minimal stock of land’ reflecting an exceptionally tight land supply. Given Newham’s context with more ‘slack in the system’ to support a demand led approach supporting both jobs and homes, 12 months is considered an appropriate time period for market demand testing. It should also be noted the 12 month marketing period is not a new feature of the policy, but was introduced and scrutinised in 2016 as part of Policy J4 (now absorbed into Policy J2) of the DSPDPD.

In accordance with paragraph 22 of the NPPF therefore, the 12 month marketing period is a justified benchmark in relation to local evidence about the industrial, providing clarification of what ‘reasonable prospect’ should be judged to mean outside of designated sites. For designated sites, the ‘reasonable prospect’ assessment has occurred though an assessment of qualitative, spatial and quantitative demand factors.

\textsuperscript{13} LB Richmond Inspector’s Report, April 2018
5.5 Skills and Access to Employment: Is policy J3, which aims to secure 35% of all construction phase jobs and 50% of all post construction (end user jobs) for Newham residents justified?

How realistic is this policy to implement? What would be its likely impact on the local economy?

Policy J3 seeks to maximise economic opportunities presented by development in pursuit of Good Growth and promoting economic inclusion (supporting Convergence), which remains a key priority for the plan and Council as a whole. Initial scoping (as highlighted in the SWOT analysis on pg 10) identifies that the borough continues to suffer from high levels of multiple deprivation, particularly in the economic sphere, (with youth unemployment a particular problem) which has knock on effects on the local economy and personal resilience, affecting purchasing power, housing quality and health. Promotion of jobs targets therefore has positive impacts as identified in the IIA in relation to social, environmental and economic objectives particularly promoting equal economic opportunities for all, reducing high levels of unemployment (particularly for young adults) supporting overall economic resilience, (e.g. of town centre shops and services) and helping to reduce travel to work distances and associated costs and environmental impacts. In some cases they also help mitigate displacement effects.

The jobs targets, which apply only to Major developments enhance the existing established policy (Core Strategy J3 and part of DSPDPD Policy J4) by formalising targets that have been used informally in practice in the implementation of these policies in S106 negotiations. This helps to ensure that such targets are appropriately factored into land deals and financial modelling early on in the development process. Feedback from the viability testing (EB02) notes that the targets should be applied flexibly due to the impact they have on some schemes, particularly those that are employment led. In addition, as the OA (SD06) notes as raised in consultation responses, in some schemes there will be a need to attend to specific construction methods (e.g. off site fabrication) and sectoral specialisms (i.e. likelihood of there being suitably skilled local residents to occupy the jobs). As a consequence the targets are expressed as subject to viability, and their application must also be cognisant of proposed construction methods and sectoral specialisms. As per INF9, these will be weighed up against other calls on viability (e.g. affordable housing) to arrive at a suitable balance in light of a the specific circumstances of a scheme and site.

As set out in the Options Appraisal (SD06) and as part of the implementation, a key delivery mechanism is the Council’s jobs brokerage organisation, Workplace who have a successful local track record of supporting local employment in Newham - in 2017/18 securing a total of 3,319 jobs for instance, and their work is attributed to a significant improvement in employment rates in recent years 14. Recently secured

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14 The ELR Part 2 notes: ‘the number of economically active residents in 2016 was 177,700, which was a third higher compared to 2010. This is a huge increase, and proportionally significant as 73% of the working age group (16-64) in the Borough are economically active up from 62% in 2010. The proportion is closer to, but still behind the London and GB averages (both 78%)’. 

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targets (secured through S106 agreements linked to collaboration with Workplace) at the construction phase include Stratford Central (37%), 210 Plaistow Rd (50%) and the Stratford Stratosphere (50%) and end-user at London City Airport, (50%) Jenkins Lane, (50%) East Ham Industrial Estate, (50%) Aspers Stratford (71%) and Canning Town Area 8 (50%). However, the policy also allows for other mechanisms where these are considered suitably robust such as bespoke employer led training commitments (typically resulting in certification) linked to a specific sites and modern construction methods.

Overall therefore, the policy is considered to be justified and effective when considered against the logic of the Plan’s wider objectives, (including local economic objectives) established delivery mechanisms and delivery in some cases exceeding these targets, as well as appropriate flexibility in the policy itself to ensure no disproportionate negative impacts on viability where financial contributions are sought.
S1 Spatial Strategy and Strategic Framework

Objective

5.1 Focus major development opportunities within the Arc of Opportunity to secure transformational change for the borough and its residents and integrate the Arc with the existing urban neighbourhoods elsewhere in the borough and beyond.

Policy

Proposals that address and where appropriate accord with the following overarching strategic principles, vision based spatial strategy and design and technical criteria will be supported:

1. Strategic Principles

a. Securing transformational change for the borough and its residents with the Our overriding priority is to build and reinforce communities and places that work and to ensure that growth contributes to achieving convergence and personal and community resilience, with new and existing communities, jobs, homes, services, spaces and facilities well integrated in connected, distinctive, successful, quality places.

b. Realising the potential and making best use of Newham’s land, green space, and blue ribbon network and heritage assets, connectivity, existing and emerging economic strengths, We will working with our delivery partners to provide of at least 37,500 43,000 homes and 39,000-60,000 jobs between 2012 2018 and 2027 2033 to place Newham at the heart of London’s march eastward and its global presence.

c. Higher density, genuinely mixed use, context sensitive development will achieve Delivery of these homes relies on a number of factors and must not be at the expense of creating new jobs for our residents good growth, and the creatingion of and sustaining new and rejuvenated inclusive, stable, healthy, mixed and balanced communities where people choose to live, work and stay and a borough where homes are not created at the expense of jobs, environmental and housing quality, provision and protection of family housing, or liveable scales of development, where employment uses can sit comfortably with housing and supporting services and do not undermine town and local centres and where We need to ensure new housing development is accompanied by jobs growth and timely delivery of supporting physical, social and green infrastructure, including that to address existing deficits and cumulative impacts.

d. Keeping Newham Moving through promoting a significant modal shift
towards active modes of travel and public transport and ensuring appropriate investment in the quality and connectivity of its strategic and local route and communications network (road based and otherwise).

e. Enabling Newham to become cleaner and greener, achieving sustainable development through all scales of development by maximising integration of green infrastructure, and other sustainable design, technologies and management techniques, including innovative approaches to energy requirements, air quality and flood risk and waste management.

2. Vision based spatial strategy

a. The greatest opportunities for change will come forward within the Arc of Opportunity which will be the primary focus for new job creation, infrastructure development, new town and local centres, carefully located tall buildings at public transport nodes, and the vast majority of new housing on large sites in Beckton, the Royal Docks, Canning Town and Custom House, West Ham and Stratford over the plan period, reconnecting residents with the rivers and docks.

b. Urban Newham will see more incremental and smaller scale change in a ‘Web of Opportunity’ including carefully placed taller buildings focused on Town and Local Centres and Crossrail stations but will benefit from new development in the Arc and elsewhere through investment and improved connectivity within the borough (notably north-south) and beyond (notably across the Thames and across London) and comparable attention to design quality, including carefully placed taller buildings, with wider neighbourhoods strengthened according to their particular character, assets and opportunities, making creative use of small spaces, redevelopment opportunities and retrofitting access to jobs, business opportunities, homes and services.

c. Successful mixed use areas will emerge and be sustained, notably in town centres, LMUAs and on Strategic Sites, and at a smaller scale particularly associated with social infrastructure investment.

The creation of new and rejuvenated communities across the borough and ensuring that new development in the Arc of Opportunity benefits residents in Urban Newham, through investment and improved access to jobs, business opportunities, homes and services.

Achieve a lasting Olympic Legacy benefiting local residents by providing new jobs, homes, services and facilities which are well integrated with the surrounding neighbourhoods.
d. **Achieve** A major but managed shift from traditional industrial activity will be achieved on Strategic Sites and LMUAs and more broadly along the Lower Lea Valley and in the Royal Docks Enterprise Zone towards **higher value** employment uses in emerging growth sectors such as high technology and **green** creative industries, **night time**, visitor, retail, leisure and **cultural** economy, business and financial services, and retail, making best use of heritage and other assets in the area;

e. **Concentrate** Heavier industrial uses, warehouses and utilities will continue to be concentrated, but will evolve and intensify in the Strategic Industrial Locations (SIL) in Beckton, Thameside East and West and Cody Road and smaller locally significant industrial areas (LILs) elsewhere, supported by appropriate environmental enhancements, **buffering** and active but consolidated wharves;

f. Whilst utilities infrastructure including transport depots, ferry access, sewage works and electricity pylons will continue to be present, supporting growth and investment, its spatial impact will be minimised to help secure compatibility with other uses as these come closer; new utilities infrastructure will be particularly related to the requirements of modern sustainable living and environmental resilience.

Promote genuinely mixed-use areas where employment uses can sit comfortably with housing and supporting services and do not undermine

g. **Focused, vibrant, accessible and multi-functional** **Town** and **Local Centres** which will, together with wider neighbourhoods, be strengthened according to their particular character, and assets and opportunities as vital hearts to local neighbourhoods, with a clear hierarchy evident in function and form, from the Metropolitan Centre of Stratford, through to Major Centres at East Ham, Beckton Riverside and Canning Town, and District Centres at Green Street, Forest Gate and East Beckton, and local centres at other key transport nodes; and

Prioritise quality new family housing over smaller residential units to rebalance the borough’s housing stock;

Provide new or enhanced social and green infrastructure where these are required to support new housing and address existing deficits

h. **Promoting** **New and or enhanced open spaces** and walking and cycling routes will be created throughout the borough, making best use of the borough’s waterways and green spaces, including along the Lower Lea Valley, and other Blue Ribbon corridors, thereby better connecting residents to the River Thames, Olympic Park and Lee Valley Regional Park and making best use of the borough’s waterways and green spaces securing the delivery of optimal route and nodal frequency, missing
links and view corridors, to support the realisation of a connected, continuous permeable and legible movement and green space network;

i. All new development will be well-integrated with its surroundings to create successful high quality and well connected areas, including the limitation of tall buildings to identified suitable locations.

improve connectivity both within the borough and to areas beyond it through strategic and local transport investment including new river crossings, improvements and extensions to the existing route network, and safeguarding and promoting facilities for the use of waterways for the transport of freight; and

Support the development of a decentralised energy network across the borough and promote opportunities for retrofitting existing properties;

3. Design and technical criteria

a. Sites should be designed and developed comprehensively: The Council will resist the development of any sites in a piecemeal way, particularly where this would prejudice the realisation of the overall vision for the area or where timing of delivery would be unsupported by infrastructure. Large applications will be expected to be accompanied by realistic phasing proposals.

b. The expectation that sites should be masterplanned, particularly Strategic Sites that should contribute to the delivery of key strategic links and connections set out in Policies S2-6 and INF2, of new local/town centres, or to accommodate tall buildings as per Policy SP4.

Strategic Sites have been identified which will contribute to the delivery of these objectives. These are allocated by listed in Policies S2-6, detailed in Appendix 1, and shown on the Policies Mmap below. The map below identifies the Community Neighbourhoods and their respective S2-6 policy.

For the purpose of Neighbourhood Planning, the following sections and associated sub-paragraphs of this policy are considered to be strategic policies with which a neighbourhood plan should conform: 1. Strategic Principles; 2. Vision Based Spatial Strategy; 3. Design and Technical Criteria.
Insert full page map identifying community neighbourhoods and the S2-6 policies
5.2 The London Plan identifies two Opportunity Areas covering the ‘Arc of Opportunity’, stretching from Stratford and the Olympic Park, down the Lea Valley and east through the Royal Docks. The London Plan states that such areas can typically each accommodate at least 5,000 jobs and 2,500 homes or a mix of the two. Newham has a vital role in the continuing development of London as a World City. It is a vibrant, dynamic and ambitious Borough that seeks to continue to maximise the opportunities for transformation and regeneration catalysed through the 2012 Olympic and Paralympic Games wider sub-regional growth and other work by public agencies, and derived from excellent transport connections, a wealth of development land, established and emerging growth sectors, and a young, diverse and increasingly skilled population. Overall, the Local Plan seeks to deliver 43,000 homes and 39,000 to 60,000 jobs between 2017 and 2037, as part of a series of new, genuinely mixed use places acting as a series of beacons across the whole area, woven into a fabric of equivalent quality and diversity.

5.2a This vision relates to the need to tackle the legacy of Newham’s historic position in London whereby in being outside the more restrictive city boundaries, it became the disproportionately-favoured location for dirty, malodorous and noisy industry and infrastructure, and in turn suffered significantly from the demise of the docks and decline of certain traditional industries, and poorly designed social housing estates. While access to a wide range of infrastructure and employment uses is acknowledged as an engine for growth that the Local Plan seeks to reinforce, achieving transformational change requires significant improvements in the quality of design and overall offer of development, including a more balanced mix of uses, greater attention to local as well as strategic needs, better integration between and across sites and neighbourhoods, and more consideration of opportunity costs and externalities as well as benefits. In some cases this is about new types and forms of development; in others however, it is about providing adequate protection for industry and logistics (some of London-wide significance) and opportunities to work locally, breathing and social spaces and the settings of places and particular assets.

5.2b Successful place-making and the creation and sustenance of sustainable communities in Newham therefore require careful management of development: optimising it in relation to strengths and opportunities - ranging from large scale vacant sites to small scale infill/intensification and transition - rather than maximising it or pursuing singular agendas. This means pursuing quality, diversity and inclusivity not just quantity, long term sustainability as well as short term gains, balance in the provision of [types of] homes, jobs and physical, social and green infrastructure, addressing deficits as well as new needs arising, and ensuring investment in the Arc of Opportunity (the Arc) and elsewhere the Web of Opportunity (the Web) provides opportunities for all of Newham’s residents. Optimising
development also means addressing the factors that have more traditionally meant Newham has been a ‘port of entry’ that people quickly move on from, (e.g. lack of housing choice, or quality schools) as well as new quality of life impacts arising from the scale and pace of development, together with issues relating to demographic and economic change in Newham and elsewhere. The latter includes for instance, an increase in older people requiring different types of housing; rising housing costs generating affordable housing needs; and continued relatively cheap rents drawing in disproportionate demand for certain types of space from outside of Newham which needs to be balanced against local need.

5.2c In turn, these considerations are important components of the Convergence and Resilience agendas pursued by the Council (and Growth Boroughs in the case of Convergence). This is about acknowledging the gaps in outcomes (such as health and life expectancy) within Newham and between Newham and boroughs further west, tackling causes and ensuring residents and businesses build resilience so they can weather more challenging times personally and through being part of a cohesive community and support networks. Population stability furthers this by ensuring that public and private investment in people is retained locally and generates local benefits, and by helping to foster strong local networks that pervade. Similarly, planning for mixed and balanced communities, and diversity of economic opportunity makes for more resilient neighbourhoods and places, as it spreads risk and reduces vulnerability, making it less likely that they will suffer spirals of decline.

5.2d The spatial strategy sets out how this optimisation and good growth will be achieved across the borough, acknowledging the different types of opportunities in different parts of Newham, conceptually represented by the Arc and the Web, drawing together more detailed positions set out in subsequent spatial and thematic policies and associated Strategic and Non-strategic Site allocations and designations. In doing so, and in interacting with the strategic principles, it also recognises that the relative scale of opportunity in the Arc is such that as well as meeting needs arising from new growth, development there (often across several Strategic Sites which act in concert across community neighbourhood and borough boundaries) will have an important role in addressing existing deficits in Urban Newham, a role requiring further attention to connection/barriers between Urban Newham and the Arc.

5.3 Developing the extensive land available in the Arc of Opportunity provides the greatest scope to achieve transformational change in the lives of Newham’s residents by providing high quality homes, employment and services and, helping to achieve convergence with other neighbourhoods across London.

5.4 However this must take place in a comprehensive, rather than piecemeal
manner, in order to ensure that new housing areas are not gated communities, isolated from the rest of the borough, and that new employment uses can sit comfortably alongside residential areas and vice versa. Strategic Sites have therefore been proposed, setting out the mix of appropriate uses and key development principles for each, to address the issues identified in the evidence base. Some Strategic Sites have also been identified in Urban Newham, in Town Centres, which provide most scope for change. Policies S2-S6 describe the opportunities for development for each of these sites, alongside other factors to be taken into account in creating and enhancing communities in those areas both on the sites and beyond them (e.g. heritage and other assets to be conserved and enhanced) as informed by the wide-ranging evidence base. Of additional over-arching significance is the need for comprehensive development and masterplanning, particularly of large scale Strategic Sites in order to help them achieve multiple objectives, but also where several sites/interventions/developments in close proximity need to work together to achieve desired outcomes, and more broadly to support integration of new and existing development, and neighbourliness which becomes evermore important as competition for land increases and uses must necessarily co-exist closer together.

5.5 Over time, changes in the economy including the closure of the Docks have meant that certain industries declined, vacating or less intensively using their sites. The changes in the structure of the London economy mean there is a reduced need for the large supply of existing employment land, justifying some release for alternative uses. The area has also benefited from decades of public investment in land assembly, remediation, and infrastructure development, shifting industry to modern estates particularly at Beckton, and is on the cusp of transformation. Newham is described in the London Plan as a borough where a ‘managed transfer of industrial land to other uses’ is required.

5.6 To deliver this spatial strategy it is proposed that approximately 80 hectares of employment land is released to other uses. Policy J2 sets out the proposed land-use change.

5.7 The development of completely new neighbourhoods will require new and enhanced physical, social and green infrastructure (e.g. new highway access, bridges, schools and open space). The Infrastructure Study also found that there were existing infrastructure deficits within Urban Newham, principally relating to education and health facilities and open spaces, that need to be addressed.

5.8 The infrastructure requirements arising from new development and to deal with existing deficits are detailed in the Infrastructure Delivery Plan (Appendix 3).
Implementation

5.9 This policy sets out the over-arching vision for the borough, explaining the Key Diagram and providing the strategic framework that other policies cascade from and connect into. Policies S2-6 set out how the Strategic Principles and Spatial Strategy will be delivered at the community neighbourhood level, including phasing. The Annual Monitoring Report will monitor housing delivery for the borough as a whole, and by Community Forum Areas. Policies S2-6 therefore set out the Strategic Sites and other local designations which will make a contribution to the delivery of housing, jobs, services and infrastructure within each of the Community Forum areas, building on thematic spatial policies and other thematic criteria set out in policies SP1-9, J1-3, H1-4, SC1-5 and INF1-9, which should be referred to for more implementation detail. Whilst an approximate housing delivery has been calculated in accordance with methods described in the accompanying text of policy H1, it is acknowledged that evolving development opportunities mean that delivery may well far exceed the current estimates, in which case infrastructure requirements will need to be re-visited in discussion with the Council. However, there are also a number of significant sites close to the Community Forum boundaries. Where these have an influence on other Community Forum Areas, for example in terms of facilities, or connections, they have also been included in the policy for the adjacent area, to recognise the wider regeneration context.

5.10 The Council will make the best use of public assets by working with other public agencies, including the use of Compulsory Purchase (CPO) powers and land assembly.

5.11 The use of local tax incentives (e.g. TIFs and BIDs) to deliver infrastructure improvements will be examined.

5.11a In order to enable development of Strategic Sites and the Arc more generally, the Council will proactively engage with Duty to Cooperate partners and other stakeholders, including infrastructure and utility providers, developers and private landowners, and interested community groups, to remove barriers to delivery. This will include investigating a variety of means of funding and otherwise supporting, infrastructure and other development-enabling interventions, (e.g. land assembly, decontamination, decking and undergrounding), ensuring that these occur prior to development occurring or in a way that adequately future proofs.

Monitoring

5.11a Output monitoring will look at policy use in practice and progress on Key Strategic Sites and headline IDP planning and project milestones achieved via
in-house monitoring, given these are vital to achieve the transformation of places in line with the vision. Outcome-relevant principles such as ‘good growth’, and ‘community cohesion’ and ‘resilience’ are more difficult to quantify, though can be assessed through qualitative data gathered through regular Council-commissioned survey questions concerning satisfaction with the area and different aspects of life, the personal ability to ‘bounce back’ and perceptions about the extent people feel comfortable living amidst others who live locally, though these are clearly only partly influenced by planning. Others, such as achieving a more stable community are more easily associated with existing, widely available indicators, and can be compared with other authorities to help measure convergence, though Council Tax records will be used to look more closely at internal churn.

However, it is noted that the delivery of the policy vision and objectives is also reliant on the support of partner public sector agencies, members and residents, as well as the collaboration of private landowners, developers and organisations, and wider market forces will also have a significant impact delivery. As such, continued liaison and discussion to ensure that such stakeholders buy into the vision and strategic principles will be important, pre-empting any problems or seeking to secure early solutions.

Success, particularly regarding convergence will also be reliant on the application of all other thematic and spatial policies, hence monitoring should take place in the round as far as possible.

5.11b Indicators:

i. S-OP1 Strategic Sites Progress [Target: progress in line with the criteria and delivery timeline set out in Appendix 1];

ii. S-OP2 Headline IDP milestones achieved [No specific targets, see IDP for timescales/key deliverables]

iii. S-OP3 Policy Use and Robustness – in decision-making and at appeal [no specific target; should be using regularly in different types of planning decisions if effective, and supported at appeal]

iv. S-OUT1- A Place People Choose to Live, Work and Stay:

   a. S-Out1a Population Change through Migration [No specific target: churn should be reducing towards pan-London levels though in-migration likely to continue to be high due to strategic housing growth]

   b. S-OUT1b: Satisfaction with the Area [Maintain above 75%, should be improving]

v. S-OUT2 Resilience:
a. S-OUT2a: Local Area Cohesion [No specific target, should be improving]

b. S-OUT1b: Personal Resilience [No specific target, should be improving]

c. S-OUT2c: Life Satisfaction (No specific target, should be improving)
S4 Canning Town and Custom House

**Objective**

5.45 Canning Town will undergo a comprehensive programme of regeneration and renewal, to provide an enhanced neighbourhood delivering new homes, with an expanded town centre and carefully-placed taller buildings at its heart. There will be an improvement in the quality of Custom House/Freemasons local centre, with an intensification of uses around the station, building on the opportunities offered by Crossrail. New connections will be created through the area, including two new streets, and the local environment, including open space, considerably enhanced.

5.46 The Cody Road employment area will be strengthened, including the definition of Strategic Industrial Location (SIL) boundaries to incorporate the Prologis Industrial Estate. There will be scope for other traditional employment areas on the fringes of Canning Town to diversify, including emerging business sectors and other supporting uses.

**Policy**

Proposals which address, and where appropriate accord with the following overarching strategic principles and vision-based spatial strategy will be supported:

1. **Strategic Criteria:**

   a. Achieve an enhanced, integrated, mixed and balanced neighbourhood including new waterside quarters, with and an expanded successful town centre at its heart and secondary focuses and intensification at Thames Wharf, West Ham and Custom House/Freemasons Local Centres, together with strengthened employment areas.

   Approximately 7,950 new additional dwellings will be developed in Canning Town and Custom House Community Forum. The majority of these will come forward on identified Strategic Sites as shown on the Proposals Map and included in Appendix 1. (For an explanation of indicative housing typologies referred to in relation to these sites, please see Policy H1 Implementation paragraph 6.116-6.118)

   b. The area’s regionally-significant economic role will be reinforced through further development of the existing warehousing, engineering and green industry, and visitor economy, business and conference clusters with good access to the Strategic Road Network, complemented by town centre growth and change towards Major Centre status, and bolstered by the new Crossrail station.
c. Major new housing (approximately at least 15,608 additional units), jobs growth and infrastructure provision will be delivered through a comprehensive programme of regeneration and renewal and managed release of SIL and associated wharf consolidation primarily on 12 Strategic Sites, acting in concert with those in adjoining neighbouring areas and well integrated with their surroundings, with non-strategic opportunities, including through managed transition, activation and sensitive infill also being identifiable at locations within the wider area.

S08 Thames Wharf
S11 Parcelforce
S13 Manor Road
S14 Canning Town Central
S15 Canning Town East
S16 Silvertown Way East
S17 Silvertown Way West
S18 Limm
S28 Custom House/Freemasons
S30 Royal Victoria West
Adjacent Sites:
S10 Abbey Mills
Silvertown Landing

Proposals which address, and where appropriate accord with, the following vision-based policies for the wider area will be supported:

2. **Spatial Strategy:**

Unsatisfactory housing and other surplus sites in the area will be replaced and around 7,950 new additional with homes of a wider variety of sizes and tenures in line with Policies H1 and H2 in a series of well-connected, safe and sustainable neighbourhoods which have easy access to community infrastructure. Abbey Arms, Freemasons Road, and West Ham will be key Local Centre with further local shopping protected at Cundy Road. New and improved open spaces will be provided through the Lea River Park and other opportunities as they arise.

a. Canning Town town centre will be a revitalised, intensified and expanded, and re-oriented town centre, growing in status – marked by some of the tallest buildings in the borough - as well as physical extent, benefiting from a re-modelled high quality junction and public realm, a new foodstore south of the Barking Road, a modernised renewed market space better links to the station and bus station, and a better quality and mix of shops and other uses including leisure and workspace that improve activation, trade draw and dwell time, and improved east-west links to the station interchange and to adjacent residential neighbourhoods, functioning will be a new heart for the area, as an employment hub and
broader focus for activity and facilities both during the day and into the evening. Variety and distinctiveness will be fostered by the range of uses in the centre; a mix of unit types and scales; and effective integration with the existing high street part of the town centre, surrounding neighbourhoods and heritage assets, including development of attractive gateway sites with complementary uses and settings and a careful distribution and composition of tall buildings that protect views and make appropriate transitions.

b. Custom House will become the primary gateway to south Newham and the Royal Docks with the opening of Crossrail. Custom House station will become the centre of an effective transport interchange that connects with Freemasons Local centre and through to the ExCeL Centre, London City Airport and beyond, supporting a renewal and expansion of the centre welcoming both local residents and visitors to ExCeL and other dockside destinations. As the main north-south connection, Freemasons Road will become a place where people choose to walk, cycle and use public transport as well as stop and rest. Development will be intensified in the vicinity of the most accessible locations (Canning Town and Custom House and Royal Victoria stations,) making best use of land, including undergrounding of pylons should opportunities arise, whilst not contravening sustainable community and design quality objectives, achieving coherence and-integration with other development in the area—Canning Town town centre will be a minor hub for some of the tallest buildings in the borough, contributing to its identity as a key town centre for the borough;

c. New local centres at and community uses focused around West Ham and Thames Wharf stations will become resource hubs for new neighbourhoods and surrounding areas, marked by new tall buildings and well-used by new and existing residents, local workers and others passing through the area, with visitors drawn into the sites, towards the rivers by attractive parkland routes and onward connections.

d. Elsewhere, Abbey Arms, will be a key Local Centre and resource hub, with further local shopping protected at Cundy Road, Fife Road and Western Gateway.

e. Two new streets will be created across the area: one residential in character, one more activity-based and including green infrastructure. These will provide important connections between the town centre, surrounding neighbourhoods, important and improving community facilities and open space, and the other key node of Freemasons/Custom House.

f. Links will also be improved with surrounding areas including to the district centres at Bromley-by-Bow and East Beckton, to stations, the town centre from the south, the Lea River Park and Greenway, the docks and
ExCel/Royal Victoria and Royal Albert employment hubs, and the Thames with new accessible bridges put in place and re-opened over rivers and other barriers, connect with neighbouring communities in Tower Hamlets amongst others, along the Leaway (see Canning Town and Custom House Inset map) facilitated by the release of Mayer Parry and Priors Wharves, at Ailsa Street, Poplar Reach, Oban Street, Leamouth, Customhouse, over the dock to Silvertown Quays, as well as through general increased pedestrian and cycling permeability and comfort, (notably along North Woolwich Road) interchange improvements, and bus routes that have evolved to address [new] desired patterns of movement better connections to the new local centre around West Ham station, new district centre at Bromley-by-Bow to the north and the Lee Valley Regional Park.

The public realm, environmental quality and overall standard of design will be considerably upgraded, ensuring everyone can enjoy the area’s offer in full, particularly on foot and by bike. As well as improvements to connectivity, making better use of the area’s public transport access, better design will bring safety and security, ease of navigation, mitigation of utilities infrastructure, and a revaluation of the area’s natural and heritage assets (notably Victorian buildings Barking Road, Bevan houses in Canning Town, and the Bow Creek Ecology Park);

g. Cody Road together with Prologis Industrial Estate will continue to be an important employment location, focused particularly on heavier industry, (include waste processing and engineering) warehousing and distribution, with Strategic Sites at Canning Town Riverside and Parcelforce, and the LMUA at Bidder Street managing the transition to residential to the north and south; Managed Release of SIL and the associated Safeguarded Wharf at Thames Wharf will occur in the context of wider industrial opportunities in the Royal Docks, allowing for re-location and re-provision/consolidation off site.

h. The dockside mixed use leisure, convention, recreation and business district focused around the ExCel Centre, Crystal Building and Cable Car, will be a further employment hub, with a focus on consolidation and integration within the area, addressing deficiencies such as lack of green space, poor pedestrian environment along Seagull Lane, the cumulative impact of tall buildings, and the barrier effect of the Crossrail line and of long linear development, developing new links with the complementary evolving employment hub at Royal Albert.

i. LMUAs at Bidder Street, Silvertown Arches, Esk Road and Beeby Road and additional micro-opportunities to the east of Canning Town Centre, will complement and further diversify the employment offer moving towards lighter, cultural, creative and service uses more compatible with residential and other contexts; smaller scale industrial opportunities will also be available at Butchers Road LIL.
j. **Outside of the Strategic Sites** - which will see comprehensive development replacing underused employment land and lower quality or poorly laid out housing and commercial uses with a wider variety of sizes and tenures in a series of high quality, well-connected, safe and sustainable neighbourhoods which have easy access to employment and new and enhanced community facilities - residential hinterlands will undergo more gradual renewal brought about by the cumulative impact of small scale changes and character sensitive infill including public realm and smaller scale infrastructure improvements particularly focused on the Key Corridors of Barking Road, North Woolwich Road, Victoria Dock Road, Silvertown Way, Manor Road, Freemasons Road /New Barn Street/Butchers Road/Munday Road, Hermit Road/Grange Road/Upper Road, and Balaam Street.

k. **New and improved open space connecting with the green grid and integrating and re-valuing heritage assets** will be provided amidst large scale residential development and through the ongoing evolution of the Lea River Park linking the Queen Elizabeth Olympic Park to the Royal Docks and Thames and across to communities in Tower Hamlets, with continuous linear greenspace broadening out at Cody Dock and Royal Victoria West and into parks at Bow Creek Ecology park which will be enhanced, and on the Limmo Peninsula and at the Bromley by Bow gasholders, which will be made publicly accessible and will make substantial contributions to district and local park deficits in the wider area.

*Custom House station will connect with the existing Freemasons local centre to become an enhanced local centre, with an offer directed at and welcoming to both local residents and visitors to ExCeL and other dockside destinations;*

*Better links between the consolidating dockside mixed use leisure, convention, recreation and business district and the wider area will help spread the benefits of the New Economy, recognised around ExCeL as an employment hub;*

*Cody Road together with Prologis Industrial Estate will continue to be an important employment location, focused particularly on heavier industry, recognised as an employment hub and Strategic Industrial Location.*

l. **Local energy generation and district heating** will be extended in the area with Major developments being required to enable linkage to networks; and

m. **In order to deliver the above vision-based spatial strategy, the following Strategic Sites sites, as shown on the Policies Map, are allocated for development as set out in Appendix 1:**
The Council will not support the development of sites in a piecemeal way particularly where this would prejudice the realisation of the overall vision for the area or where timing of delivery would be unsupported by infrastructure. Large applications should be accompanied by realistic phasing proposals.

For the purpose of Neighbourhood Planning, the following sections and associated sub-paragraphs of this policy are considered to be strategic policies with which a neighbourhood plan should conform: 1.Strategic Principles; 2.Vision Based Spatial Strategy.
Updated map
Canning Town and Custom House is an historic East End neighbourhood that has been in existence since the mid-1800s, when poor quality workers’ slum dwellings were built to support heavy industry around the Royal Victoria Dock. Following extensive war damage and waves of regeneration in the early 20th Century and post-war period, today’s Canning Town and Custom House is mainly a residential neighbourhood, with development including terraced houses, walk-up maisonette blocks and point tower blocks. It incorporates a district centre and important tube, DLR and bus connections at Canning Town station, as well as significant areas of industrial and commercial units around Cody Road and a strongly emerging visitor economy focused around the international conference and events centre, ExCeL.

Whilst the area has no Conservation Areas, fragments of important historic development are pepper potted throughout the area. Examples include the Grade II listed churches of Roman Catholic Chapel of St Margaret, Memorial Baptist Church, and Chapel of St George and St Helena, Grade II listed pubs Fairbairn Hall and the Connaught Tavern, and seven Grade II listed gasholders at the former Bromley-by-Bow gasworks site in the north, and industrial heritage such as warehouses and cranes alongside Royal Victoria Dock. The Victorian Church of St Luke in Canning Town has a spectacular spire, visible from the 1930s Silvertown Way viaduct, (in itself notable for being the first ‘flyover’ in Britain) though it is surrounded on all sides by industrial development, post-war housing and contemporary flats. Parts of Barking Road in this area are also distinguished by a small number of buildings of local historic interest, forming the Barking Road (West) Area of Townscape Value that includes the former Canning Town library, one of a number of buildings established by John Passmore Edwards (a wealthy philanthropist) in the late 19th Century, and the adjacent Public Hall.

However, the area has declined in the 1970s and 80s, since its post-war reconstruction, its residents suffering from the demise of dock-related industry by the late 1970s and a legacy of poor urban design (including poor connectivity), poor quality, monotonous housing and intrusive infrastructure which create significant barriers and visual impacts. Today, while investment, redevelopment and other regeneration initiatives spanning over a decade have helped improve the outcomes for local residents, much of the area still falls within the top 10% most deprived areas in England and Wales, with a significant number of older, unemployed, and disabled residents, and little private housing. The need to turn this around, together with the area’s excellent potential given its existing and improving connections – with a Crossrail station proposed at Custom House, proximity to Canary Wharf and waterside sites – has been the impetus behind the £3.7 billion Canning Town

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1 DCLG (2015), [English indices of deprivation 2015](#)
and Custom House Regeneration Programme, which has identified the scope for comprehensive redevelopment on a number of key sites to make the significant changes to the area that this ‘turnaround’ requires. Whilst this is in train, it is a long term project. For example, the Town Centre Study 2016\(^2\) recognises that, with significant changes having taken place since 2010 and more occurring and planned, Canning Town town centre is still in transition. As such this requires a continued emphasis on curation and management of it as an evolving place, employment hub and town centre with Major centre potential. This includes fostering a range of uses, and unit types and scales, including affordable workspace and ensuring the quality and diversity of the offer is well anchored by uses that are likely to pervade, and contribute to an expanded trade draw, dwell time and activation into the evening as well as during the day.

5.49 However, the area’s spatial planning needs extend beyond the Canning Town and Custom House Regeneration Programme area (see Spatial Policies Map), to the Royal Docks and up the Lower Lea Valley to West Ham. The strategy for the wider area includes activation of the Lea River by delivering the Lea River Park vision, including through appropriately sized and designed green spaces, revaluation of heritage assets, new walking and cycling routes and new bridge links to address both its continuity and connectivity to adjacent neighbourhoods. The masterplanning of Strategic Sites at West Ham and Thames Wharf, (as well as those in between) have key roles to play in this vision, as well as providing new foci for the communities to be created around them at their respective stations via, at Thames Wharf, managed release of the SIL and transfer of wharf safeguarding to the proposed consolidated wharf at Central Thameside West. While Canning Town Riverside also includes a two safeguarded wharves, Mayer Parry and adjacent Priors, they have not been in operation for a long time and there are significant operational constraints that would need to be overcome to bring them back into use. Pending the GLA’s Safeguarded Wharfs Review, it is expected that these wharves will be released from safeguarding. In the northeast of the area, the Greenway provides important connections as part of the wider green grid to Stratford, Plaistow, East Ham and Beckton, and its enhancement and further connectivity are important strategic objectives. Elsewhere, LMUAs will also provide an important opportunity to diversify and intensify the range of local employment opportunities beyond the main industrial areas and smaller LILs.

5.49a There are also significant developments planned at Bromley-by-Bow, and a greater emphasis on residential development in the Tower Hamlets localities bordering the area, particularly at Leamouth Peninsula, Housing Zone at Poplar and Greenwich Peninsula, which may be mutually beneficial if appropriately integrated.

\(^2\) LB Newham (2016), London Borough of Newham Town Centre & Retail Study Update 2016
Implementation

5.50 The Canning Town and Custom House Regeneration Programme will deliver the majority of new homes, mostly on publicly owned sites, including substantive Council and GLA owned sites, and the remainder will be delivered through a combination of large and medium sized schemes outside the programme area, though again with substantial public sector land ownership (notably by the GLA), together with other small sites in a mixture of ownerships. Whilst an approximate housing delivery has been calculated in accordance with methods described in the accompanying text of policy H1, it is acknowledged that evolving development opportunities mean that delivery may well far exceed the current estimates, in which case infrastructure requirements will need to be re-visited in discussion with the Council. The area’s many and increasing benefits, notably the arrival of Crossrail and scope for a new DLR station at Thames Wharf, together with wharf consolidation elsewhere, planned public realm, transport interchange, walking and cycling and social infrastructure investment, changes to the town centre to future proof it, and a buoyant industrial market and visitor economy linked to ExCeL, should help provide continued development momentum.

5.51 The policy is in effect the detailed spatial expression of many of the thematic policies in the plan which should be read and deployed in conjunction with it. More detailed guidance and advisory information is also available in relation to the Lea River Park concerning the vision, design codes, and potential connectivity projects, and in the Character Study, Town Centre and Retail Study, the Strategic Flood Risk Assessment, Employment Land Review and Infrastructure Delivery Plan. The Local Heat Network LDO (2013) and London Heat Map provide further detail with regards to the opportunities of delivering decentralised energy in Canning Town area. All these documents can be accessed on the Council’s website. Airport safeguarding information and mapping can also be viewed on the council’s GIS system. The Canning Town and Custom House Masterplan and Supplementary Planning Document widely consulted on and adopted in 2008, guide development and investment in the area towards a sustainable community vision, to be updated and supplemented as necessary. Open space projects are referred to in Policy INF6 and associated spatial designations in Appendix 1. Where appropriate, area and site specific policies (including additional nonstrategic sites) will also be detailed further through subsequent DPDs.

5.51a London Plan policies, and the Mayor’s Safeguarded Wharves Review, when published, will also be relevant to assessment of proposals relating to the Mayer Parry Wharf, Priors Wharf and Thames Wharf. Consultation with the

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3 Lea River Park Constituent Authorities (2008), Lea River Park Primer, Design Manual, and Curatorial Approach
4 GLA, London Heat Map
5 LB Newham (2017), Local Plan development and review
6 LBN, GIS mapping
PLA is required in relation to proposals for Thames Wharf and any river crossings up to the PLA’s navigational limits at the A13.

5.52 Improvements to environmental quality will include a continuing commitment to pursue less intrusive infrastructure, subject to viability and established national protocols (e.g. the mitigation of, and/or, the undergrounding of high voltage overhead transmission cables). The Strategic Sites that will deliver this policy are:

Monitoring

5.52a See S1, noting that S-OP-1, 2 & 3 and S-OUT-1b can be broken down by CN/spatial policy area.

S08 Thames Wharf
Proposed release from Strategic Industrial Location (see Policy J2). There is scope to reconfigure the safeguarded wharf on the site to the adjacent site (Carlsberg-Tetley) or to remove the wharf safeguarding at Thames Wharf if a consolidated wharf can be delivered at Thameside West, subject to there being no net loss of functionality or wharf capacity. If it can be demonstrated that either scheme can be delivered, this could provide the opportunity to develop new employment, leisure/tourism and residential uses grouped around a potential new DLR station, where passive provision is in place, subject to addressing the constraints on the site, including the Silvertown Crossing safeguarding area, and the removal of the wharf safeguarding by the Secretary of State. Indicative residential typology—medium density, medium family.

The Council will work together with other public sector agencies and developers to further investigate proposals for relocating or consolidating the four individual safeguarded wharves at Thameside West, to facilitate a more efficient use of land, and support the growing neighbourhood at Silvertown. See Policies INF1 and J2 for details.

S11 Parcelforce
Employment-led mixed use linked to Cody Road industrial area that contributes to the creation of a new local centre in the station vicinity and facilitation of a possible future link to S10 Abbey Mills. Site access improvements will be required, including a link to West Ham station. Indicative residential typology—medium density, medium family.

S13 Manor Road
Residential-led mixed use scheme incorporating open space with green grid links to Star Park; commercial frontage (including B1) to Barking Road section east of Manor Road which will be the only part of the site to remain in the town centre boundary, and business use alongside the railway. Indicative residential typology—medium density, medium family.
S14 Canning Town Central
Expanded District Centre abutting a transport hub, moving towards a Major Centre in composition and scale, within a revised boundary to comprise retail (to include anchor food store of up to 6,500 sq m net, and significant comparison floorspace – up to 25,000 sq m net) leisure and civic space making use of the more pleasant street environment created by the remodelling of the junction and public realm, residential, and community uses. Connections to the Activity Street to the south/south-east, and residential street to the east/north-east, and through to the station will be important, together with an integrated town centre that links with existing retail frontages and the market. Indicative residential typology – medium density, medium family.

S15 Canning Town East
Residential with supporting community uses, notably a school to the west, and other multi-use facilities easily accessible from the town centre to the east, and green space of at least the existing quantum, linking to the residential street abutting the street to the south. Connections also need to be made across the site between uses, avoiding blocking effects. Indicative residential typology – medium density, medium family.

S16 Silvertown Way East
Mixed use comprising residential and business use fronting Caxton Street North opposite existing units, and public open space within the urban structure making green grid connections to Keir Hardie recreation ground and dealing with the amenity impacts of traffic. Connections to be made with Activity Street to the north-east, north to the town centre and north-west to the station. Indicative residential typology – medium density, medium family.

S17 Silvertown Way West
Mixed use comprising residential, and business, with commercial units and higher density residential facing the street within the town centre boundary, and business uses extending to face units under arches in Peto Street North. Connectivity to the main town centre and the rest of Canning Town needs to be addressed, together with amenity impacts of traffic. Indicative residential typology – medium density, medium family.

S18 Limmo
Open space forming appropriate connections and terminus to Lea River Park, with enabling residential use should access and environmental constraints be overcome. Connections need to be made to Canning Town station/town centre and neighbourhoods, and to the Leamouth peninsula. Indicative residential typology – medium density, medium family.

S20 Royal Victoria West
New residential, leisure and cultural uses will be supported at this gateway
site to the Royal Docks. The Siemens building and Cable Car link to Greenwich Peninsula are due to be completed in 2012, providing new visitor attractions. Public realm improvements, including an enhanced pedestrian and cycle link to Canning Town, and active water space are key priorities in this location. Indicative residential typology—medium density, low family.

S28 Custom House/Freemasons Road
Intensified residential and commercial/business space, making use of Crossrail potential which will form the nucleus of a renewed and expanded local centre with improved physical and functional links to ExCeL, and open space linking to the proposed Activity Street to the north-west, and through a series of open spaces to Cundy Park to the south-west. Indicative residential typology—medium to high density, medium family.

S31 Royal Albert North
This site straddles both Canning Town & Custom House and Beckton Community Forum Areas. Promotion of business and education uses, building on the strengths of the University of East London and land availability for innovative high-tech manufacturing and research and development. A link will be created from Beckton Park, bringing the park into the Dock and enhancing access for local residents to new employment and training opportunities.

Adjacent Sites

S10 Abbey Mills
The site will be developed for a mix of residential and employment uses and contribute to the creation of a new local centre in the station vicinity. Site access improvements will be required including a link to West Ham Station. This mix may include an element of community uses (including faith-based) of a scale which is proportionate and which does not dominate the overall mix of uses in respect of land take, scale and traffic generation, located either within the local centre or so as to be well connected with the local centre and the station. Site access improvements will be required including a link to West Ham Station and facilitation of a possible future link to S11 Parcelforce. Indicative residential typology—medium density, medium family.
J1 Business and Jobs Growth Investment in the New Economy

Objective

6.77 To attract investment in growth sectors and support the existing business base, maximising quality employment potential and creating a dynamic business environment by selective protection and development of quality premises and places.

Policy

Proposals that address the following strategic principles, spatial strategy and design and technical criteria will be supported:

1. **Strategic Principles:**

   a. Realise the benefits of the borough’s connectivity, international profile and existing and emerging sectoral strengths to secure delivery of a supply of land, infrastructure, premises and successful places capable of attracting innovative and high value added companies, reflecting London’s strongest and dynamic economic investment in growth sectors and supporting the existing business base, facilitating the continued diversification of the borough economy and supporting Convergence aims. including:

   - **Business and financial services**
   - **Retail**
   - **The visitor economy, cultural and creative industries**
   - **High-technology manufacturing and green enterprise**
   - **Education**
   - **Construction**

   b. Promote employment, industry and logistics as an important components of sustainable, mixed use places, whilst recognising the need for this to be strategically managed to ensure premises and places balance the needs of business, visitors, the economy, the environment and Newham’s communities, meet evidenced demand, benefit from agent of change principles, and as per J2, make efficient use of land.

   The continued shift in the borough’s economy away from traditional
industrial activity to one based on services and higher value industry, focused on Olympic Legacy opportunities and making full use of underutilised land and excellent transport connections will be promoted and facilitated.

2. **Spatial Strategy:**

To this end, development proposals which respond appropriately to the following contributors to inward investment and economic competitiveness will be supported:

a. Continued development and promotion of the Arc of Opportunity and employment hubs elsewhere as (amongst other things), high quality business environments with a diversity of flexible, future-proofed premises high standard of supporting infrastructure, capable of competing as one of London’s prime locations for economic development with particular strengths as set out in Table J.a: follows. These include:

- Development of more and better quality affordable and flexible local workspaces reflecting the needs of growth sectors and expanding local businesses, particularly managed work environments and supporting infrastructure providing small and medium sized units with short term letting options;
- Promote employment as an important component of sustainable mixed use neighbourhoods, supporting local services;
- Strengthening the connections between the borough’s business locations and London and European economic anchors of Stratford, Canary Wharf, City of London and the West End;

The following spatial strategy:

b. Develop the visitor economy and promote Newham as a sustainable destination, balancing the needs of visitors, the economy, the environment and Newham’s communities, focusing visitor attractions and facilities and quality visitor accommodation on Strategic Sites in the Royals Docks and S08, LCY airport and ExCel employment hubs, Stratford Metropolitan and the Olympic Park and Green Street town centres; and quality visitor accommodation in town centres proportionate to their function and character, together with the Royal Docks Strategic Sites and S08, S31 and ExCel/Royal Victoria West Employment Hubs;

c. Major office development (Use Class B1(a)) will be directed to Stratford, in accordance with Policy S2, with Canning Town as a secondary location, in accordance with Policy S4. Smaller-scale office development will be
encouraged in the other Town Centres, LMUAs and MBOAs and on appropriate mixed use Strategic Sites;

d. Major industrial development will be directed to and where appropriate intensified (including support for displaced businesses) at Strategic Industrial Locations and Local Industrial Locations (as per Policy J2 and designated in Table J.b) Concentrate and protect industry in Strategic Industrial Locations (Refer to Policy J2), promoting high technology manufacturing, knowledge intensive and green industries in the Royal Docks; and

e. New town centre - including night-time and evening economy - uses and community facilities will be directed within the defined hierarchy to a centre, including emergent centres on Strategic Sites, proportionate to its scale, unless related to the visitor economy (as per 2b above), clearly ancillary to other uses, and the NPPF sequential test is met (as per INF5 and SP6) and where relevant, boundaries, identified by Policy INF5 with other commercial and community uses additionally managed by Polices INF8, SP3, SP2 and SP7.

f. Small-scale start-up and/or cultural and creative workspace will be directed to, town centres, notably Stratford Metropolitan, East Ham, Forest Gate and Green Street, LMUAs and MBOAs, and where appropriate CFOAs (as defined in J2 & INF8) or masterplanned as part of mixed use Strategic Sites, notably at North Woolwich Gateway;

3. **Design and Technical criteria**

a. New employment-generating development should demonstrate, especially when outside of LILs and SILs, that it can exist in close proximity to housing with minimal amenity impact as per SP8.

b. New housing must demonstrate neighbourliness, in respect of existing and potential employment uses LILs, SILs, and existing employment uses in employment hubs or otherwise expected to prevail, taking on responsibility for protecting those uses from the possibility of future complaint due to the proximity of new residential neighbours

c. Require new out of centre town centre uses of more than 300 sq m net to demonstrate that they do not result in unacceptable impacts as per INF5:3a

d. New night-time economy uses must demonstrate that they promote a safe and high quality environment for all, cognisant of cumulative impacts set out in Policy SP9.

e. Require all Strategic Site proposals and Major developments incorporating employment floorspace in employment hubs and/or on Sil, LIL, and LMUAs
set out in J2, to address Convergence objectives through an Employment Strategy that details:

i. phasing of new permanent employment-generating floorspace in such a way that maximises the likelihood of beneficial use considering deployment of temporary uses where appropriate;

ii. marketing / demand testing and occupier commitments in relation to the proposed mix of unit type, scale and tenure, recognising the identified shortages and surpluses identified by the Newham ELR Part 2 and subsequent updates; and

iii. commitments to work with the Council’s Workplace organisation to maximise local employment opportunities, including appropriate lead-in times in relation to training provision.

For the purpose of Neighbourhood Planning, the following sections and associated sub-paragraphs of this policy are considered to be strategic policies with which a neighbourhood plan should conform: 1.Strategic Principles; 2.Spatial Strategy.

Table J.A: Employment Hubs

<table>
<thead>
<tr>
<th>Employment Hub</th>
<th>Strength/Focus</th>
</tr>
</thead>
<tbody>
<tr>
<td>E5 Stratford Metropolitan</td>
<td>Town centre uses <strong>including</strong> visitor economy, <strong>evening and night-time</strong> economy, creative and cultural industries, further and higher education and associated supply chain; <strong>CAZ reserve for offices (especially public sector) potential for Government office re-location from central London</strong></td>
</tr>
<tr>
<td>E8 Canning Town (town centre vicinity)</td>
<td>Town centre uses <strong>including leisure, evening and night-time economy</strong> and associated supply chain</td>
</tr>
<tr>
<td>E9 ExCel/Royal Victoria West</td>
<td>Visitor economy, business and conference</td>
</tr>
<tr>
<td>E11 London City Airport</td>
<td>Visitor economy, <strong>business</strong> and logistics</td>
</tr>
<tr>
<td>E10 Royal Albert North</td>
<td>Visitor economy, higher education and spin offs, Council head office</td>
</tr>
<tr>
<td>E12 Newham University Hospital</td>
<td>Health and education</td>
</tr>
<tr>
<td>E6 Green Street</td>
<td>Town centre uses <strong>including leisure, evening and night-time economy</strong>, visitor economy</td>
</tr>
<tr>
<td>E7 East Ham</td>
<td>Town centre uses <strong>including leisure, evening and night-time economy</strong>, creative and cultural</td>
</tr>
<tr>
<td>Employment Hub</td>
<td>B Class Uses (SIL)</td>
</tr>
<tr>
<td>----------------</td>
<td>--------------------</td>
</tr>
<tr>
<td><strong>E3 Thameside East</strong></td>
<td>particularly food manufacture, high technology, cultural and creative and green industries</td>
</tr>
<tr>
<td><strong>E1 Beckton</strong></td>
<td>especially distribution and logistics, plus engineering (transport depot) and utilities and waste/green industries. Retail and associated supply chain</td>
</tr>
<tr>
<td><strong>E4 Cody Road/Prologis</strong></td>
<td>especially distribution and logistics, engineering and green industries</td>
</tr>
<tr>
<td><strong>E2 Thameside West</strong></td>
<td>particularly high technology manufacturing, wharf related uses, cultural and creative, construction and green industries</td>
</tr>
<tr>
<td><strong>E13 Albert Island</strong></td>
<td>B class uses (LIL) including marine engineering, high technology and warehousing and construction training</td>
</tr>
<tr>
<td><strong>E14 Forest Gate</strong></td>
<td>Town centre uses and supply chain, cultural and creative industries</td>
</tr>
<tr>
<td><strong>E15 East Beckton</strong></td>
<td>Town centre uses and community facilities</td>
</tr>
</tbody>
</table>

*Employment hubs are defined on the Policies Proposals Map and on the map below. For associated Strategic Sites see spatial policies S2-6 and Appendix 1.*
[UPDATED J1 MAPPING]
Reasoned Justification

6.78 It is expected that more jobs will be created in Newham over the next two decades than anywhere else in London, with the possible exception of Canary Wharf in Tower Hamlets, a borough that has seen increases by a third in the numbers of economically active residents since 2010. It is The London Plan Projections estimated that during the plan period an approximate increase of between 39,000 - 60,000 could be created 57,000 jobs in Newham by 2031, which is the highest of all neighbouring boroughs with the exception of Tower Hamlets. That between 2007 and 2031 there will be an increase of some 750,000 jobs in London, with 24,000 of these additional jobs in Newham. However, given the scale of development and regeneration across the borough, this figure is likely to be significantly higher, with the current Westfield development alone adding over 8,000 jobs to the borough by 2011.

6.79 In order to help maximise growth potential achieve and exceed these forecasts, and promote sustainable and quality employment that addresses the successful mixed use place, convergence and resilience agendas, the policy seeks to attract and retain investment from growth sectors such as culture, creative and visitor and evening economy, education and knowledge led economy, hi-tech manufacturing, warehousing and logistics, construction and green enterprise, business and business services building on Newham’s strong platform for economic growth. In doing so, the policy aims, capitalise on its excellent connectivity including with The City, Stratford, Canary Wharf and the West End and beyond, and providing for associated land, premises (including storage/yard space) and infrastructure requirements, (including digital, energy, transport, work and social spaces).

6.79a Ensuring that the supply of suitable employment land and premises is appropriately protected and newly provided for to meet emerging growth sectors will be a key component in maximising Newham’s economic strength and future investment, recognising that in the competition for land, this needs to be evidence led, related to growth needs and not entirely speculative, and to work to achieve efficient use of land without undermining functionality. In this respect for instance, it is noted that independent budget hotel market provision is extensive relative to more luxury and quality assured (more than 2*) premises. Likewise, the Employment Land Review (ELR) Demand Assessment demonstrates that major office floorspace is more than well provided for within the pipeline, and at present is unlikely to be justifiable elsewhere in terms of likely beneficial occupation, though there is a gap in the market for smaller scale, more locally oriented offices. Similarly, whilst there is growth in the cultural and creative sector, and significant displacement pressures from increasingly expensive inner boroughs, its presence in Newham will need to be carefully curated rather

1 Newham Employment Land Review Part 2: Demand Assessment (2017)
than provided purely on the basis that ‘if we build it they will come’. The Council’s Economic Development Strategy aims to protect and nurture the best of the existing employment in the borough and capitalise on its excellent locational and infrastructural advantages. This means for example, working to attract the high-quality growth sectors identified in the policy above, and further reinforcing these advantages, making use of extensive development land. In addition, the EDS highlights the need to grow the existing business base by providing for flexible premises able to respond to changing business needs, associated infrastructure, successful Town Centres and the promotion of local supply chain and local employment links; particular need has been identified for the provision of premises for micro, social, small and medium enterprises. The Core Strategy aims to deliver on the spatial dimensions of this strategy, and this policy alongside J2, J3, SP6, SP3, and INF5, is a key means of doing so.

6.79b In supporting the broad range of employment opportunities, the policy seeks to create high quality business environments that are supported by appropriate associated infrastructure (including digital, energy, social infrastructure and facilities) and delivered to meet the needs and requirements of existing and future businesses and its users. Promotion of diverse and flexible workspace allows response to changing business needs and create robust, future proofed places, including successful Town Centres and the promotion of local supply chain and local employment links; indeed, particular need has been identified for micro, social, small and medium enterprises, as well as larger ones, and a variety of ownership lease and licence terms and prices².

6.80 Although overall the Council will be seeking a broad range of employment opportunities, certain types of employment are considered to be more appropriate or likely to succeed in particular areas such as larger evening/night time uses within Major or Metropolitan town centres, visitor accommodation in town centres or in employment hubs with particular visitor economy roles, cultural and creative in MBOAs and LMUAs, and major Office development in Stratford. This building on locational advantages including agglomeration effects related to key use clusters, compatibility with the wider area, and the provision of appropriate infrastructure, such as the capacity of the transport network. Recognising significant areas of existing employment and identifying their future potential, the Council has therefore designated a number of Employment Hubs. These are mostly in the Arc of Opportunity, but also relate to other key employers and employment areas in Urban Newham, notably the Town Centres. In these, suitable employment uses will be encouraged, and in some cases protected and expanded, where appropriate looking to reinforce their success by new development at key sites just beyond them as well as within the hubs themselves. Superimposed on this are a number

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of sector-specific strategies, relating to other policies in the plan, (notably public transport accessibility (INF2) and particular opportunity areas identified in spatial policies) national and London-wide policies.

6.80a Although the majority of employment will be directed to these areas, other locations are likely to be suitable for smaller-scale development, for example in Strategic Sites identified for mixed uses as detailed in Policies S1-6 and other small-scale designations including LMUAs for cultural/creative workspaces and LILs recognising local clusters of industry as identified in policy J2 (and Table J.b).

6.80b In overall creating a mixed used area, it is important that new uses contribute to neighbourliness, as per SP8 to overall create successful places, generally working on the basis of ‘Agent of Change’ principles. Depending on the area, there will be different emphases as to which uses have to be compatible with which, seeking to appropriately buffer core SIL and LIL and night time economy clusters, but also key residential areas, whilst generally recognising new employment floorspace design is much more compatible with residential than some existing floorpace, and in some areas cumulative impacts need to be managed as per SP9. Similarly, in some cases, out of centre town centre uses as set out in more detail in policies INF5 ensuring impacts on town centres, through demonstrating need will need to be addressed.

6.81 Other smaller-scale designations will be identified in the proposed Detailed Sites and Policies DPD. Lastly, the policy specifies in more detail how in relation to proposed employment-generating aspects developments on Strategic Sites or other strategically significant locations (as specified) should better address the strategic objective of generating a step change in residents’ social and economic well-being, to bring it more in line with the rest of London. Whilst it is the nature of many of these sites that development times may be long, and floorspace to some extent speculative, there are various ways in which such sites can be made to work harder, with greater certainty of delivery in terms of this objective.

Implementation

6.82 The Council will continue to work together with town centre managers, local businesses and business groups to support Newham’s economic growth and develop the tourism and leisure offer, cultural uses, and the evening/night-time economy, and generally develop and improve the business environment of Town Centres.

6.83 The Council will continue to take a proactive development management role consistent with its Economic Development Strategy, working with partner organisations (including developers) to grow the business, modern industrial, digital and creative sectors by offering high quality employment
environments and support for employment generation and education and training opportunities.

6.84 Developers will be expected to address the criteria in this policy in scheme formulation and accompanying planning statements, including a specific, robustly evidenced Employment Strategy providing robust evidence where indicated necessary, (e.g. re-marketing of the site/scheme) to be agreed with the Case Officer. Further guidance will be given as necessary in the Detailed Sites and Policies DPD and area based Supplementary Planning Documents. To ensure business requirements are met it will be expected that marketing and demand testing will be demonstrated, and consideration given accordingly to market appropriate physical forms and supporting facilities, types of management and tenure, (including short term licensing options, managed and affordable workspace) together with appropriate meanwhile use, marketing and phasing strategies. Likewise, as per J3, a commitment to work with the Council’s well established employment intermediary will be expected. The Council will work with applicants through established pre-application advice channels to advise on the acceptability of approaches to satisfy these requirements.

6.84a Resultant commitments and agent of change principles will be secured by appropriate conditions and legal agreements. In order for employment-generating uses to benefit from neighbourliness and Agent of Change, presumptions however, they should be acting reasonably and lawfully within the existing consents and permissions. Equally, where new employment-generating development occurs, the assumption is that the opportunity should be taken through modern design, supply chain specification (e.g. re-delivery modes) and engineering techniques to also optimise neighbourliness and minimise off-site spatial impacts (noise, odour, vibration etc.) as per SP8.

6.84a.i In responding to the criterion concerned with balancing, inter alia economic needs and those of the environment, it will be expected that policies SC1-5, SP5, INF9, INF6&7 and INF2 will be particularly relevant noting the need to consider off-site indirect and in-combination effects, particularly in relation to traffic movements and resultant of air/water quality impacts, as well as those on site.

Monitoring

6.84b The monitoring framework includes specific performance indicators relating to strategic business and jobs growth upon which the relevance and efficacy of Policy J1 will be assessed. Outputs are monitored through in-house monitoring of consents, (partly recorded in the London Development Database (LDD) and GIS analysis together with analysis of decision-making. Outcomes draw on national statistics available annually, though those linked to J3 will also be relevant. Continued engagement with the business sector, including agents, and via Elected Members, and local residents will also be
important feedback mechanisms, particularly as regards changing patterns of demand, the appropriateness of the spatial strategy and the efficacy of agent of change/neighbourliness criteria.

6.84c Indicators

i. J-OP1 Business and Jobs Growth:
   a. Additional Employment Floorspace [No specific target: maintain trend in line with ongoing development of strategic sites];
   b. Tourism and leisure development in Stratford and Royal Docks [no specific target – monitor ongoing development as per strategic site aspirations];
   c. Investment in employment hubs [no specific target, but ongoing investment should be evident];
   d. Small and affordable business space [no specific target, continue to add to provision];
   e. Small Business Space (<500 sqm) recorded as part of larger schemes [no specific target, continue to add to provision]
   f. Affordable workspace/local business occupancy provision [no specific target, continue to add to provision]

ii. J-OP4 Policy Use and Robustness [no specific target; should be using regularly if effective, and support at appeal the majority of the times use];

iii. J-OUT1- Economic Development - Business Domain
   a. Business by sector [Target: should be steady or growing]
   b. New business formation and survival [Target: should be steady or growing]
J2 Providing for Efficient Use of Employment Land

**Objective**

6.85 To achieve more efficient use of employment land to support economic growth sectors and a higher jobs density both through the retention of the most suitable locations, coupled with managed release of land that is, or becomes, surplus to requirements for such uses over the plan period.

**Policy**

Proposals that address the following strategic principles, spatial strategy and design and technical criteria will be supported:

1. **Strategic Principles**

   a. To achieve efficient use of employment land to support economic growth sectors and wider growth needs through the retention of the most suitable locations and capacity, intensification with no net loss of functionality, and coupled with the limited, plan-led managed release of land as set out spatially in Map J2—surplus to requirements for such uses over the plan period.

   b. To manage the positive and negative impacts of employment-generating uses to ensure a managed transition to successful mixed use places at the large and small scale, helping to secure a balanced mix of jobs and homes.

2. **Spatial Strategy**

   a. Strategic Industrial Locations (SIL) and Local Industrial Locations (LIL) as listed in Table J.6 are designated for protection, Managed Intensification and as suitable in principle for Use Classes B1(b) B1(c) B2, B8, appropriate sui generis employment uses including waste, utilities and transport depots, with other supporting facilities including B1a uses, where ancillary in scale and function. Sites with notable development capacities are identified in the spatial policies and Strategic Site Allocations at Central Thameside West, North Woolwich Gateway and Silvertown Landing.

   Major industrial development will be directed to Strategic Industrial Locations (SIL)

   The Core Strategy defines SIL in the following locations:

   1. Fish Island/ Marshgate Lane North (Bow Goods Yard East)
   2. London Industrial Park
   3. British Gas/ Cody Road
   4. Thameside West
5. Thameside East
6. Beckton Riverside

SIL is subdivided as follows:

1. Preferred Industrial Locations (PIL)
   - London Industrial Park
   - Thameside West
   - Thameside East
   - Beckton Riverside (part)
   - Fish Island/ Marshgate Lane North (Bow Goods Yard East part)

2. Industrial Business Parks (IBP)
   - Fish Island/Marshgate Lane North (Bow Goods Yard East) (part)
   - Beckton Riverside (part)
   - British Gas/Cody Road

These locations are defined on the map below and in Proposals Map.

PIL is suitable in principle for Use Classes B1(c), B2 and B8 and appropriate sui generis employment uses.

IBP is suitable in principle for Use Classes B1(b) B1(c) and higher quality B2 uses.

b. The majority of the sites proposed for re-designation comprise Strategic Sites in the Core Strategy; proposals for these areas are covered by Spatial Policies S1 — S6. The following sites will be released from SIL protection subject to Managed Release criteria and where proposals are in line with the vision set out in the spatial and other successful place-making policies including the relevant site allocation:

1. Silvertown Landing (Thameside West (part)
2. Lyle park West (Thameside West)
3. Connaught Riverside (Thameside East) (part)
4. Beckton Riverside (part)
5. Thames Wharf
6. Minoco Wharf

There is also scope for some limited further release through intensification of SIL uses over a smaller land area on the sites at Canning Town Riverside, Beckton Riverside and Silvertown Landing, where compliant with Managed Intensification criteria and spatial policies including the relevant site allocation.

c. Local Mixed Use Area (LMUAs) identified in Table J.b are allocated for employment-led mixed use that:
i. protects and promotes Class B1 uses and other employment-generating uses compatible with residential, subject to town centre and other infrastructure policies; and/or

ii. allows for Managed Transition (subject to the criteria below) and redevelopment to focus on the ongoing viable operation of such uses and design incorporating or compatible with residential uses, whilst addressing any other site-specific issues.

d. **Support proposals** within Micro Businesses Opportunity Areas (MBOAs) identified in Table J.b where allowing change of use, intensification and redevelopment incorporates employment floor space of up to 570 sq m (GIA) and that accommodates no more than 10 employees (cognisant of typical employment densities) subject to other policy considerations notably SP2, SP3, SP8 and SP7;

e. Allowing small-scale (less than 100 sqm GEA) B Class or Sui Generis non-speculative employment floorspace outside of defined employment areas to meet local business needs, and subject to other policy considerations, notably policies SP2 and SP8;

f. Elsewhere/in other cases, subject to compliance with Managed Release criteria on sites of 0.1ha or more, or where operational employment-generating floorspace compromises of 1,000 sqm or more, promoting consolidation of all other B class and sui generis employment-generating uses into such defined areas:

i. SIL, LIL, LMUAs and MBOAs as per the above spatial strategy;

or, in order to relieve pressure on core SIL/LIL areas,

ii. Strategic Sites providing other suitable new employment-floorspace; and

iii. Where compatible, onto otherwise undesignated/allocated out of town retail parks.

The Council will support the rationalisation or relocation consolidation of four of the safeguarded wharves in Thameside West onto Central Thameside West in line with Policy INF1 and S3 to promote a more effective use of employment land subject to compliance with the Managed Intensification Criteria, and of the release of 2 wharves in the Canning Town Riverside area and adjacent (Mayer Parry and Priors Wharf) as per relevant London Plan Policies.

These locations are defined in Table J.b the Proposals policies map below and in Table J.b Map.
3. **Design and Technical Criteria**

The release of employment land will be carefully managed over the plan period. In employment areas identified for re-designation for other land uses, development proposals should:

i) Be consistent with the relevant Spatial Policy;

ii) Not prejudice the comprehensive regeneration of the area through piecemeal proposals; developers may therefore be required to prepare Masterplans;

iii) Ensuring neighbourly development is achieved (in line with policy SP8) and not jeopardising the functioning of any remaining employment uses;

iv) Create a significantly higher number or better quality of jobs (in line with the economic development trajectory mapped out in Policy J1) than those that might be lost; and

v) In the case of non-employment-generating land uses that are replacing employment-generating uses, demonstrate that there is no longer any demand for employment space

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a. Require applicants on sites (including Strategic Sites) covered by Managed Release and Managed Transition Criteria to:

i. Have in place a strategy to deal with the relocation requirements of existing businesses that cannot be incorporated within a redevelopment no matter the extent of their lease interest, making reasonable endeavours to ensure they have a suitable alternative site secured, including transitional arrangements, cognisant of their local and regional economic role; and

ii. Where release to solely residential use (outside of strategic sites) is proposed, demonstrate marketing at locally benchmarked [industrial] prices/rents through local agents for a period of at least 12 months for the full range of permitted uses, including the option for sub-division and mixed use development incorporating the viable employment uses;

iii. Ensuring neighbourly development is achieved (in line with policy SP8) and not jeopardising the functioning of any remaining employment uses, including those incorporated within the redevelopment; and

iv. Demonstrate that new employment floorspace within the redevelopment is designed to respond to evidenced market demand and occupier requirements to secure viable occupation.
b. Require proposals on sites covered by Managed Intensification specifications to demonstrate:

i. genuine intensification that maintains or increases capacity of the relevant SIL or LIL land use and achieves a reduced spatial footprint or spatial impacts; and

ii. no net loss of functionality, including ability to meet evidenced local and appropriate strategic industrial and warehousing qualitative and quantitative demand.

The tables and map below indicate where employment land, including SIL, will be redesignated over the plan period.

Release elsewhere should be an exception to be considered on an equivalent basis, whilst also applying London Plan policies concerning the quantums and functional integrity of strategic reserves of employment land of London-wide significance.

For the purpose of Neighbourhood Planning, the following sections and associated sub-paragraphs of this policy are considered to be strategic policies with which a neighbourhood plan should conform: 1.Strategic Principles; 2.Spatial Strategy a.,b, c, f and g only.

<table>
<thead>
<tr>
<th>Site Reference</th>
<th>Site</th>
<th>Function</th>
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<tbody>
<tr>
<td>SIL</td>
<td>London Industrial Park</td>
<td>SIL</td>
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<tr>
<td>SIL</td>
<td>British Gas/Cody Road</td>
<td>SIL</td>
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<tr>
<td>SIL</td>
<td>Thameside West</td>
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<td>SIL</td>
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<tr>
<td>SIL</td>
<td>Beckton Riverside</td>
<td>SIL</td>
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<tr>
<td>LIL 1</td>
<td>Stephenson Street</td>
<td>LIL (Logistics and Transport)</td>
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<td>LIL 2</td>
<td>Jubilee Line Depot</td>
<td>LIL (Logistics and Transport)</td>
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<td>LIL 3</td>
<td>East Ham Depot</td>
<td>LIL (Logistics and Transport)</td>
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<tr>
<td>LIL 5</td>
<td>Land East of City Airport</td>
<td>LIL (Logistics and Transport)</td>
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<td>LIL 6</td>
<td>Folkestone Road Depot</td>
<td>LIL (Logistics and Transport)</td>
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<tr>
<td>LIL 7</td>
<td>Beckton Gateway</td>
<td>LIL (B Class Uses and other Industrial Type Uses)</td>
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<td>LIL 8</td>
<td>Canning Road East</td>
<td>LIL (B Class Uses and other Industrial Type Uses)</td>
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<td>LIL 9</td>
<td>Nursery Lane</td>
<td>LIL (B Class Uses and other Industrial Type Uses)</td>
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<td>LIL 10</td>
<td>Grantham Road</td>
<td>LIL (B Class Uses and other Industrial Type Uses)</td>
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<td>LIL 11</td>
<td>Bridge Road Depot</td>
<td>Logistics and Transport</td>
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<tr>
<td>LMUA 1</td>
<td>Silvertown Arches</td>
<td>Employment-led mixed use (see J2.2.c)</td>
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<td>Aldersbrook</td>
<td>Employment-led mixed use (see J2.2.c)</td>
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<td>LMUA 3</td>
<td>Nursery Lane</td>
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<td>LMUA 4</td>
<td>East Ham Industrial Estate</td>
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<td>LMUA 5</td>
<td>Forest Gate Arches</td>
<td>Employment-led mixed use (see J2.2.c)</td>
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<td>LMUA 6</td>
<td>Ashburton Terrace</td>
<td>Employment-led mixed use (see J2.2.c)</td>
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<td>Dulcia Mills</td>
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<td>LMUA 8</td>
<td>Sprowston and Atherton Mews</td>
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<td>Canning Road West</td>
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<td>Bidder Street</td>
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<td>LMUA 13</td>
<td>Bridge Road Depot (was LIL)</td>
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<td>Beeby Road</td>
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<td>Atherton Mews</td>
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<td>Kudhail Industrial Complex</td>
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<td>Forest Gate</td>
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<tr>
<td>MBOA 5</td>
<td>Stratford</td>
<td>Policy ref J2.2.d</td>
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The Employment Land Review identified 512.2 ha (gross) of employment land in the borough. This consists of existing or potential employment land supply identified in a field survey. Of this the office employment land supply was recorded as 37.3 ha (i.e. land where B1(a) offices are present or have planning permission) with the remainder comprising land primarily occupied or suitable for other B Class uses. The Council is required by National and regional policy to plan positively to meet the area’s development needs and support sustainable economic growth, including support for existing and new employment sectors, whilst not protecting land that has no reasonable prospect of use. The London Plan similarly review the provision of Strategic Industrial Locations in the borough; this has been carried out in conjunction with GLA officers. The baseline definition of SIL is taken from the relevant GLA spatial database and has been refined by the Council prior to recommending any more substantial changes to the boundaries. This policy seeks to ensure the supply of land to support economic and other growth needs, i.e. including as well as industrial and other employment, housing, social and green infrastructure, waste, transport and utilities, recognising their interrelationships, for instance, that housing growth generates warehousing and logistics needs, and employment growth generates housing need. In doing so it seeks to optimise opportunities for economic growth in a way that supports a strong local economy (and therefore resilience and convergence) and wider strategic needs, and promotes a quality of place, through a spatial strategy and reservoir of employment land that provides for different types of employment space, with varying locational requirements and compatibility with other uses, and managed, plan-led land use change.

Newham is a strategically important industrial location for London. It has the balance of infrastructure to enable businesses to adequately service the CAZ with staff able to easily travel by public transport (and to be enhanced through the delivery of Crossrail). In order to assess employment land needs across the borough, the Council have completed an Employment Land Review (ELR). The Review sought to qualitatively audit the existing employment land alongside a commissioned study to objectively assess future demand for employment space over the plan period.

The Review concludes that over the plan period there are is likely to be a surplus of approximately 9 ha of office land and approximately 75 ha of industrial land and therefore recommends the managed release of a number of sites for other uses based on an assessment of qualitative and other criteria (see tables below) that industrial development is viable throughout the borough but there is strong demand for industrial space (including ‘last mile’ uses) across the Borough which is currently not being met. The ELR identifies that the Borough has a demand for at least 26 ha of industrial and warehousing land, (16 ha for warehousing / logistics including depot uses land and 9 ha for industry including waste) with further requirements derived from displacement from its Strategic Sites and those in inner London, notably Tower Hamlets, and that it has a reservoir of 42.52 ha to meet such need over the plan period, allowing for limited, Managed Release and consolidation of wharves, notably on some 6.89 The majority of the areas proposed for re-designation are defined in
the Core Strategy as Strategic Sites, which and are therefore crucial to delivering the Council’s Spatial Vision (See spatial policies). The transition therefore, from employment land to mixed use development will be carefully managed over the plan period. The criteria listed above aims to ensure this. In particular, the Council will not accept the piecemeal redevelopment of these areas where it aims to create high quality new neighbourhoods. Developers may therefore be required to prepare a Masterplan for the area to ensure the Council’s regeneration objectives are met.

6.87a Whilst some of this land, and other land formerly in employment use is vacant, only that specifically identified is seen to be ‘surplus’ to requirements, and even this will result in some displacement which will need to be re-accommodated in order to meet needs in the round, and ensure for a net increase in employment. Likewise, some employment land is seen to be in relatively low intensity use, but this should not necessarily be regarded as ‘underused’, at least spatially, as in many cases this relates to operational requirements (e.g. yard space for large vehicles), though in some cases there may be scope to intensify its use temporally by introducing further shifts or other uses at certain times of the day (e.g. coach parking).

6.87b Moreover, given the influence of ‘hope value’ for residential development and ongoing displacement pressures issues (including the use of insecure, short term leases), ‘forward protection’ (of presently vacant sites, or sites otherwise with capacity) to meet demand is recommended set out. This goes hand in hand with proposed release/transition and the provision of support to affected businesses no matter the extent of their lease, but also acknowledgement of the need for consolidation of industrial uses outside of residential areas to enhance residential environments, given that it is often such small scale uses (e.g. vehicle repair workshops) that lead to most complaints as they have not had appropriate compatibility with residential designed in.

6.87c Therefore, the different employment designations all work together. For instance, some LILs (e.g. Beckton Gateway, Albert Island, Grantham Road) and Strategic Sites with retained SIL designations (notably Silvertown Landing, Central Thameside West, North Woolwich Gateway) provide particular capacity to accommodate displaced and consolidated heavier industrial uses. Similarly, new workspace on other parts of Strategic Sites (notably Alpine Way, Connaught Riverside, North Woolwich Gateway, Lyle Park West) together with LMUAs, offer the opportunity to alleviate pressure and land demands on core industrial land, from uses or configurations of space that are more compatible with residential and help secure other benefits of a mixed use typology. It is also acknowledged that otherwise unallocated out of town retail parks in Beckton also offer some capacity of type, particularly where uses (e.g. car hire, open storage) may be more compatible with retail servicing and car parking. In turn, MBOAs, LMUAs and Strategic Sites present opportunities to develop smaller scale workspace (such as incubators, accelerators and co-working spaces) to accommodate the borough’s buoyant levels of start ups or other businesses for whom affordability is an issue, and in residential areas, some very small scale workspace to support existing business needs may be acceptable.
6.88 The Council is required by the London Plan to review the provision of Strategic Industrial Locations in the borough; this has been carried out in conjunction with GLA officers. The baseline definition of SIL is taken from the relevant GLA spatial database and has been refined by the Council prior to recommending any more substantial changes to the boundaries.

6.89 The majority of the areas proposed for re-designation are defined in the Core Strategy as Strategic Sites, and are therefore crucial to delivering the Council’s Spatial Vision (See spatial policies). The transition therefore, from employment land to mixed-use development will be carefully managed over the plan period. The criteria listed above aims to ensure this. In particular, the Council will not accept the piecemeal redevelopment of these areas where it aims to create high quality new neighbourhoods. Developers may therefore be required to prepare a Masterplan for the area to ensure the Council’s regeneration objectives are met.

6.89a However, the demand for remaining stock of land will remain acute, with landowners seeking to manage their landholdings in ways that enable them to quickly realise the higher values for their land that redevelopment incorporating residential or particular types of higher grade/higher density employment uses that command greater rents could bring. This has put particular pressure on space extensive uses such as open storage, and more affordable workspace. As with London as a whole, the plan-led Managed Release, Managed Transition and Managed Intensification approach is therefore vital to ensure that the Borough carefully manages its remaining stock and opportunity sites and overall transition to a mixed use borough to best effect. With pressure on Newham’s industrial land, new development will be expected to demonstrate that employment-generating capacity consistent with the designation/spatial strategy has been maximised, not least through the provision of market relevant space, and that changes do not result in loss of functionality.

Implementation

6.90 In line with a managed approach to the release of employment land, the Council will continue to monitor the take-up of employment land for development, vacancy rates, improvements to employment land and changes to each area of employment land proposed for re-designation.

6.91 Employment sites proposed for re-designation/continued protection that are not classified as strategic will be covered in more detail in the proposed Detailed Sites and Policies DPD and future Supplementary Planning Documents, as required.

6.92 The approach to local employment land designations (including acceptable uses on these) and release of these will be set out in the Detailed Sites and Policies DPD.

6.93 Policy will be implemented through the Development Management process

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and developers will be expected to address the criteria in this policy in scheme formulation and accompanying planning statements, Employment Strategies (where required) providing robust evidence where necessary, (e.g. marketing of the site/scheme) to be agreed with the Case Officer. Further guidance will be given as necessary in the Detailed Sites and Policies DPD and area based Supplementary Planning Documents.

6.93a The employment land designations (including acceptable land uses on these) are set out in Table J.b and the Policies Map. The Employment Land Map sets out the locations across the borough whereby the release of SIL will be allowed, subject to the Managed Release criteria and other policies.

6.93b Managed Release and Transition is a plan-led process that should occur in identified places or circumstances (in the case of the threshold referred to at 2.f). The starting point is an understanding of what presently exists on site, its economic role (for instance in servicing other economic activity providing for strategic infrastructure such as waste management capacity, as well as the quantum of floorspace and its uniqueness and/or contribution to a wider cluster) and associated locational requirements, which will in many cases require continued access to the local market. As such reasonable endeavours will require proposals to demonstrate positive and proactive engagement with existing occupiers and relocation support arrangements offered that have regard to known potential impacts on business supply chains, operational continuity and continued access to labour that have been put in place in a timely manner to ensure that disruption to existing businesses are minimised. This is likely to involve support with site search and consideration of re-accommodation within the site or other sites within the landowners control locally. Re-provision within the site is provided for in specification of various employment areas in mixed use Strategic Sites as retained SIL or SIL buffers where appropriate; it is also anticipated that it has a role in planning for flood risk management with employment uses, providing less vulnerable active ground floors in vertical mixed use. Release is therefore conditional on these needs being met, no matter the extent of the lease interest of the affected parties.

6.93b.i In and in the case of proposed full release to residential (outside of Strategic Sites), release requires robust marketing as per the technical criteria. That is in relation to smaller windfall sites in lawful employment use (not SIL Release which is linked to Strategic Site allocations and already accounted for in demand and capacity testing). The policy requires a twelve-month period for demand testing to promote redevelopment of underused employment sites whilst helping to identify those that have reasonable employment potential. As per the GLA Land for Industry and Transport SPG, the policy ensures that the site has been adequately marketed through commercial agents at a price that reflects market value for industrial use for a reasonable period and offered with potential for redevelopment where this is required to meet the need of modern industrial users.

6.93.b.ii In turn, on sites where employment uses are to continue to feature, as per J1, provision should be subject to market and demand testing, including reference to
the ELR Demand Side Study and subsequent updates.

6.93.b.iii In requiring release site to achieve Neighbourly Development (as per SP8) the assumption would be that uses to benefit from Agent of Change would be operating reasonably and lawfully over time if they in turn propose further development, that this should reflect the potential of modern design and supply chain specification to improve environmental performance and neighbourliness.

6.93.b.iv In relation to wharf consolidation wharves there are two components of the wharf strategy (policy INF1 and S3/S4). The first seeks the consolidation of four safeguarded wharves in Thameside West (Thames, Sunshine, Manhattan and Peruvian Wharves) on Central Thameside West (Peruvian and Royal Primrose Wharves) through Managed Intensification criteria (and appropriate development of associated Strategic Sites) requiring rationalisation and reduction of spatial impacts without net loss of capacity and functionality. This works with the Managed Release of associated SIL to ensure operational continuity for active wharf users. The second is the release of the two wharves at Canning Town Riverside (Mayer Parry and Priors Wharf) due to surplus capacity in the NE region. The Council will work with its partners including the PLA and GLA to realise this strategy and secure compliance with relevant London Plan policies.

6.93c. Managed Intensification, again on identified land/in specific circumstances (notably on LIL) is promoted in Canning Town Riverside Silvertown Landing and Beckton Riverside as specified in the site allocations with a view to enabling further release of co-location, should criteria be met. Elsewhere (on SIL and LIL more generally) the objective will be to increase capacity for further SIL and LIL compatible uses. In all cases it requires careful attention to the need of SIL and LIL uses on site, and how they could be intensified without compromising their operational functionality and overall capacity expectations on sites relating to modelled demand for industrial and warehousing uses (including transport, utilities and waste management) as set out in the Employment Land Review Part 2 (and any subsequent updates) and monitoring updates.

6.93.c.i Such intensification may be achieved overall on several sites, that better meet needs than one site and allow for rationalisation of space perhaps by including a non-traditional employment site (such as an otherwise unallocated out of centre retail park), or for instance, Another possibility is temporal intensification, making use of ‘down time’ on other sites. Spatially it will also include actions such as enclosure of external storage, reducing off site impacts. Functionality considerations will include continued provision of adequate yard space, road access, ability to accommodate working patterns, wider ability to accommodate projected industrial/warehousing demand, (including a measure of cross-boundary displacement) in some cases due to impacts on adjacent SIL/LIL (e.g. due to potential access routes through the subject site.
6.93d MBOAs are areas of search for micro-business and as such, scale of proposals should reflect definitions of a micro-business and typical employment densities defined by the HCA or successor work. Their operation is intended to complement town centre and Key Corridor policies, recognising that in some locations consolidation of all commercial uses into town centres is challenging, and active ground floor uses and design/quality improvements may be beneficial to the wider street. In doing so, uses should not be of a scale that would cause town centre impacts and should be non-speculative, to avoid the potential for problematic ground floor voids as per SP3.

6.93d.i Employment-led development is defined on the basis that employment needs (including the viable operation of employment generating uses on the site and where relevant, adjacent sites) should be met first in any design, and then other uses such as residential are fitted around it. This will involve a design and market engagement exercise that establishes the optimum quantum and format of employment space (or in some cases supporting utilities infrastructure) that the site can sustain and further design to ensure that other elements of the proposal do not prejudice the viable operation of such uses on the site and where relevant, adjacent sites, but also designing in compatibility with residential and quality place-making. This process should be in conjunction with response to Managed Transition criteria where appropriate.

6.93e In respect of the relation to LMUAs, in addition to the managed transition commentary above, it is worth noting that in some cases B2 and B8 uses and similar sui generis will be enabled to prevail on LMUAs through design strategies that better secure their compatibility with residential e.g. enclosure, and higher insulation standards in any residential introduced on site. In some cases, this kind of process may simply be the start of a longer term process of transition compared to elsewhere.

6.93f In order to support existing businesses, this policy also provides for the small-scale intensification of B Class and sui generis employment-generating floorspace outside of the employment land hierarchy, and scope for small-scale walk-to facilities to meet the needs of people working within industrial areas. The provision of such facilities should be in line with retail town centre and community facilities policies (INF5, INF8) which prioritise town and local centre locations for such uses but allow for small scale local provision where other access is lacking (i.e. within 400-800m, a 5-10 minute walk). Office space should be clearly ancillary to main industrial uses on a LIL, clearly linked to the employment functions in the case of childcare and training facilities, and whilst the scale is a matter of fact and degree, in line with SIL, this means that B1a floorspace should not be large-scale, predominate or compromise the wider industrial offer and preferably be necessary to its functioning.

<table>
<thead>
<tr>
<th>Cluster Name</th>
<th>UDP</th>
<th>Size Ha</th>
<th>Release Ha</th>
</tr>
</thead>
<tbody>
<tr>
<td>West Ham Mills I</td>
<td>MOZ3</td>
<td>18.1</td>
<td>9.9</td>
</tr>
</tbody>
</table>

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**Table 3 Borough-wide Employment Land re-designations**
<table>
<thead>
<tr>
<th>Existing Strategic Industrial Location</th>
<th>Ha-(within LBN)</th>
<th>Proposed Change</th>
<th>Net-change in Ha</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fish Island/Marshgate Lane</td>
<td>24.5</td>
<td>Release at Pudding Mill Lane (Marshgate Lane South/Bow Goods Yard West)</td>
<td>14.8 loss</td>
</tr>
<tr>
<td>London Industrial Park</td>
<td>22.7</td>
<td>None (no change)</td>
<td></td>
</tr>
<tr>
<td>British Gas/Cody Road</td>
<td>48.0</td>
<td>Extension northwards</td>
<td>4.6 gain</td>
</tr>
<tr>
<td>Thameside West</td>
<td>57.7</td>
<td>Release (includes Minoco Wharf planning permission as Thames Wharf)</td>
<td>31.9 loss</td>
</tr>
<tr>
<td>Thameside East</td>
<td>31.3</td>
<td>to include St.Marks Industrial Estate</td>
<td>2.4 gain</td>
</tr>
<tr>
<td>Beckton Riverside</td>
<td>139.8</td>
<td>Extension to create contiguous area</td>
<td>18.9</td>
</tr>
<tr>
<td>Total SIL (January 2012)</td>
<td>324</td>
<td>Total remaining SIL (following de-</td>
<td>303.2</td>
</tr>
</tbody>
</table>
Monitoring

6.93g The monitoring framework includes specific performance indicators relating to the use and release of employment land upon which the relevance and efficacy of Policy J2 will be assessed: monitoring is a vital component of managed release. Outputs and outcomes, will be drawn from London Development Database (annual) and frequent regular, timely (at least every 2 years) employment land surveys (e.g. Employment Land Review, GIS). Wider outcome indicators specified in J1, J3 and S1 will also be relevant. Engagement with local businesses, wider users of employment land and local residents and elected members will also provide important feedback on the efficacy of the policy. J1 will be kept under review and monitored against the indicators set out below and published in the LBN Jobs Authority Monitoring Report/Bulletins.

6.93h Indicators

i. J-OP2 Securing Effective Use of Employment Land:
   a. Employment Land Available [monitor to demonstrate project needs can be accommodated];
   b. Loss of Employment Land [no loss of land specified for protection];
   c. Net change in employment floorspace approved and completed on protected Strategic Industrial Location (SILs) and Local Industrial Locations (LILs) [no specific target, should be increasing];
   d. Employment land improvements [no specific target, monitor for change secured through planning and other interventions];

ii. J-OP4 Policy Use and Robustness [no specific target; should be using regularly if effective, and support at appeal the majority of the time];

iii. J-OUT-1 Economic Development - Business Domain:
   a. Vacancy rates on Employment Land [no specific target, should be steady or reducing relative to London/neighbouring borough averages].
Objective

2.6 To ensure the environmental, social, and design impacts of all development are neighbourly.

Policy

Proposals that address the following Strategic Principles, Spatial Strategy and Design, Management and Technical criteria will be supported:

1. Strategic principles and Spatial Strategy

a. All development is expected to achieve good neighbourliness and fairness from the outset by avoiding negative and maximising positive social, environmental and design impacts for neighbours on and off the site; The principles of neighbourliness apply throughout the lifecycle of the development.

b. The achievement of neighbourliness will ensure that the benefits of development and regeneration will be spread beyond the context of individual development proposals, in accordance with convergence aims.

c. Change brought about by development must not cause problems for existing lawful neighbours, otherwise known as an ‘agent of change’ approach; and

d. The Council encourages innovative approaches to achieving neighbourliness.

This policy applies to all development. The Council encourages innovative solutions to achieving neighbourliness and will support proposals that demonstrate:

2. Design, Management and Technical Criteria

a. Compliance with the standards and due regard to the importance of the technical guidance in Table SP.E where they are relevant to development proposals, will be expected to promote neighbourliness in addressing:

i. ensure integration with the street scene including consideration for advertisements and signage; boundary treatments; parking provision; external storage; plant housing and the quality of materials;

ii. create a safe and secure environment by reducing the likelihood of antisocial behaviour, promoting public safety (including road safety), improving security and lessening the fear of crime in accordance with policies SP1, SP2 and SP3;

iii. ensure that buildings and other spaces likely to involve the congregation of people are well managed and address the street and neighbourhood in terms of
character and orientation, legibility, inclusivity and an obvious and welcoming access;

iv. protect and enhance accessibility, local connectivity and permeability;

v. prevent the loss of, and where possible enhance on and off site green infrastructure, including public open space, private amenity space, trees and woodland in accordance with policies SC1, SC4, and SC5, SP2 and INF6 & 7;

vi. avoid creating or exacerbating off-site flood risk in accordance with policies SP9, SC3 and SC5;

vii. protect the locality from adverse microclimate effects (such as wind tunnelling) in accordance with policies SP4 and SP7; and

viii. minimise impacts of development’s interference with broadcasting and other telecommunications services.

ix. encourage the use of sustainable transport and minimise parking stress in the neighbourhood including the provision of publicly accessible car club spaces and electric car charging points in accordance with policy INF2;

x. achieve a high standard of access, egress and circulation for all, including through the provision for waste, recycling and bicycle storage facilities; the siting of parking provision and design legibility;

xi. avoid unacceptable exposure to light (including light spillage), odour, dust, noise, vibration, radiation and other amenity or health impacting pollutants in accordance with policy SP2;

xii. ensure adequate access to daylight and sunlight in accordance with policy SP3;

xiii. minimise overlooking and loss of privacy, overshadowing, and overbearing impact;

xiv. make appropriate provision for communal spaces and private amenity spaces (e.g. bedrooms and places of retreat) in multiple-user buildings (including HMOs) and should taking into account any losses incurred;

achieve a high standard of access, egress and circulation for all, including through the provision for waste, recycling and bicycle storage facilities; the siting of parking provision and design legibility.
Appropriate provision for communal spaces and private amenity spaces (e.g. bedrooms and places of retreat) in multiple-user buildings (including HMOs) and should take into account any losses incurred.

Integration with the street scene including consideration for advertisements and signage; boundary treatments; parking provision; external storage; plant housing and the quality of materials.

Buildings and other spaces likely to involve the congregation of people are well managed and address the street and neighbourhood in terms of character and orientation, legibility, inclusivity and a welcoming access.

Consideration and incorporation of the following standards and guidance as set out in Table 1 (or any subsequent updates or replacements) where possible.

Table SP.E Environmental standards and guidance

<table>
<thead>
<tr>
<th>Issue</th>
<th>Standard or Guidance</th>
</tr>
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<tbody>
<tr>
<td>Telecommunications</td>
<td>International Commission on Non-ionizing Radiation Protection (ICNIRP) guidelines</td>
</tr>
<tr>
<td>Radioactive sources and x-ray generators</td>
<td>National Radiological Protection Board (NRPB) guidelines</td>
</tr>
<tr>
<td>Light Spillage</td>
<td>GLA: Sustainable design and construction SPG (2014)</td>
</tr>
<tr>
<td></td>
<td>Department for Environment, Food and Rural Affairs (DEFFRA) guidance on sections 101 to 103 of the Clean Neighbourhoods and Environment Act 2005, titled ‘Statutory nuisance from insects and artificial light’</td>
</tr>
<tr>
<td></td>
<td>Institute of Lighting Professionals: Guidance notes for the reduction of obtrusive light.</td>
</tr>
<tr>
<td>Odour and Fumes</td>
<td>DEFRA Department for Environment, Food and Rural Affairs (DEFRA) guidance manuals for regulation of businesses that produce pollution, Environment Agency (EA), H4 Odour Management.</td>
</tr>
<tr>
<td>Dust</td>
<td>GLA: Control of dust and emissions during construction SPG (2014)</td>
</tr>
</tbody>
</table>

1 https://www.icnirp.org/
3 https://www.london.gov.uk/sites/default/files/gla_migrate_files_destination/Sustainable%20Design%20%26%20Construction%20SPG.pdf
5 https://www.theilp.org.uk/resources/free-resources/
6 ???
7 https://www.gov.uk/government/publications/environmental-permitting-h4-odour-management
8 https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/control-dust-and
<table>
<thead>
<tr>
<th>Issue</th>
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<tbody>
<tr>
<td>Noise</td>
<td>DEFRA: Noise Policy Statement for England¹</td>
</tr>
<tr>
<td></td>
<td>Education Funding Agency: BB93 Acoustic design of schools: performance standards¹⁰</td>
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<tr>
<td></td>
<td>British Standards:</td>
</tr>
<tr>
<td></td>
<td>For plant noise on residential and commercial/industrial premises:</td>
</tr>
<tr>
<td></td>
<td>BS 4142:2014 Methods for rating and assessing industrial and commercial sound.¹³</td>
</tr>
<tr>
<td></td>
<td>For controlling internal and external noise within a development:</td>
</tr>
<tr>
<td></td>
<td>BS 8233:2014 Guidance on sound insulation and noise reduction for buildings.¹⁴</td>
</tr>
<tr>
<td>Vibration</td>
<td>British Standard:</td>
</tr>
<tr>
<td></td>
<td>BS 7385-2:1993 Evaluation and measurement for vibrations in buildings¹⁵</td>
</tr>
<tr>
<td></td>
<td>BS 6472-1:2008 Guide to evaluation of human exposure to vibration in buildings. Vibration sources other than blasting.¹⁶</td>
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</tbody>
</table>

¹ https://www.gov.uk/government/publications/noise-policy-statement-for-england
¹¹ https://shop.bsigroup.com/ProductDetail?pid=000000000030258086
¹² https://shop.bsigroup.com/ProductDetail?pid=000000000030258089
¹³ https://shop.bsigroup.com/ProductDetail?pid=000000000030268406
¹⁴ https://shop.bsigroup.com/ProductDetail?pid=000000000030241579
¹⁵ https://shop.bsigroup.com/ProductDetail?pid=00000000000315191
¹⁶ https://shop.bsigroup.com/ProductDetail?pid=000000000019971044
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<tr>
<td>Anti-social Behaviour/Crime/Safety (including road safety)</td>
<td>Design Council: Building for Life 12[27]</td>
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<tr>
<td></td>
<td>Secured by Design design guides[28]</td>
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<tr>
<td></td>
<td>TfL: London Cycle Design Standards (LCDS) [29]</td>
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<td></td>
<td>Safer Places and Secured By Design / BFL 12</td>
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<tr>
<td>Car Parking &amp; Charging Points and cycle parking</td>
<td>London Plan and HSPG (2012)/BFL 12</td>
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<td></td>
<td>Design Council: Building for Life 12:10 (Car parking) [27]</td>
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<td></td>
<td>GLA: Accessible London SPG [31]</td>
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<tr>
<td></td>
<td>TfL: London Cycle Design Standards (LCDS) [29]</td>
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<tr>
<td>Daylight/Sunlight</td>
<td>BRE Guidelines</td>
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<tr>
<td></td>
<td>Building Research Establishment (BRE): Site layout planning for daylight and sunlight: a guide to good practice (BR209) [32]</td>
</tr>
<tr>
<td>Overall Neighbourhood Design and Management including permeability, accessibility and local connectivity</td>
<td>Design Council: Building For Life (BFL) 12[27]</td>
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<td></td>
<td>London Borough of Newham: Character Study (2016) [33]</td>
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<tr>
<td>Refuse, post deliveries, storage (including recycling) and utility</td>
<td>(LBN) Waste Management Guidelines / Mayors HSPG/BFL 12</td>
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<td></td>
<td>GLA: Housing SPG 2016 [34]</td>
</tr>
<tr>
<td></td>
<td>Design Council: Building For Life (BFL) 12:12 (External storage and amenity space) — Question 12 [27]</td>
</tr>
<tr>
<td></td>
<td>GLA: Housing SPG 2016</td>
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</table>

[31] https://www.london.gov.uk/what-we-do/planning/implementing-london-plan-supplementary-planning-guidance/creating-london
[33] https://www.newham.gov.uk/Pages/Services/Planning-policy.aspx
[34] https://www.london.gov.uk/what-we-do/planning/implementing-london-plan-supplementary-planning-guidance/housing-supplementary
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<thead>
<tr>
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<tbody>
<tr>
<td>Car-Parking</td>
<td>Building For Life (BFL) 12</td>
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<td>BFL-12: 10 (Parking)</td>
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<tr>
<td>Housing Design (private amenity space/space standards)</td>
<td>Mayor’s – Housing SPG–(2016) GLA: Housing SPG 2016 36</td>
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<td></td>
<td>Design Council: Building For Life (BFL) 12 37</td>
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<tr>
<td></td>
<td>GLA: Mayor’s Play and Informal Recreation SPG (2012) 38</td>
</tr>
<tr>
<td></td>
<td>GLA: Housing SPG 2016</td>
</tr>
<tr>
<td></td>
<td>London Borough of Newham: Waste Management Guidelines for Architects and Property Developers BFL 12: 12 (External storage and amenity space)</td>
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<tr>
<td>Cycle-Design</td>
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</tr>
<tr>
<td>Trees and Woodland</td>
<td>BS 5837:2012 Trees in relation to design, demolition and construction 39</td>
</tr>
</tbody>
</table>

Standards or guidance shall be deemed to relate to the most up to date version in place to the same intention and effect, accounting for the fact that current standards and guidance may be amended, restated and/or replaced from time to time.

**Policy Links**

S1, SP1, SP2, SP3, SP4, SP7, H1, INF2, SC1, SC3, SC5

For the purpose of Neighbourhood Planning, the following sections and sub-paragraphs of this policy are considered to be strategic policies with which a neighbourhood plan should conform:

1. Strategic Principles and Spatial Strategy.

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36 https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/housing-supplementary
38 https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/play-and-informal
39 https://shop.bsigroup.com/ProductDetail?pid=00000000030213642
2.7 High quality development by definition should not result in adverse impacts on the amenity enjoyed by nearby properties. The Local Plan Core Strategy seeks the creation of successful, healthy and safe places while protecting existing environments. This policy sets out detail around the securing of improvements to character and the successful integration of the differing land uses necessary to meet the range of needs in the Borough (both residential and commercial). Local Plan Core Strategy design, housing quality and transport policies provide a basis for the scrutiny of neighbour impacts, however there is scope to provide specification around the aspects that cause most concern as well as emphasise the potential for a more rounded, positive approach to neighbourliness that is aligned with the Council’s Central Agenda and the high level strategic objectives of the Local Plan Core Strategy.

2.7a The Local Plan seeks the creation of successful, healthier and safer places, and in doing so, the securing of improvements to character and the successful integration of different land uses that are necessary to meet the range of needs (including residential, commercial, industrial and infrastructural) optimising development in a way that is both neighbourly and fair. Policies SP1-7 seek to create successful places, healthy neighbourhoods and quality design. The vision in turn, seeks transformation of these characteristics to make it much more likely that people will choose to live, work and stay in the area and achieve improvements to health and deprivation so Newham is more like the rest of London.

2.7b Much of the Borough compromises already dense development where the scope for transformational change rests on the cumulative impact of smaller scale changes (Urban Newham). In these areas, many of the existing problems that people are concerned with, and those that they expect to be worsened by new development, are ‘neighbour related’ and linked to very specific aspects of design. Moreover, a key component of the overall spatial strategy promoted by the Plan is to promote higher densities and new forms of mixed use development in the Arc of Opportunity and Town Centres, where the impact of neighbours becomes more significant.

2.7c Further to this, design/place-quality, housing quality and transport policies provide a good basis for the scrutiny of neighbour impacts, given that high quality development by definition should not result in adverse impacts on the amenity enjoyed by surrounding occupiers, and should encourage positive behaviours relating to broader objectives. However this policy provides specifications around the aspects that cause most concern as well as emphasises the potential for a more rounded, positive approach to neighbourliness that is aligned with the Council’s Resilience Agenda and convergence objectives. The Local Plan Core Strategy seeks the creation of successful, healthy and safe places while protecting existing environments. This policy sets out detail around the securing of improvements to character and the successful integration of the differing land uses necessary to meet the range of needs in the Borough (both residential and commercial) Local Plan Core Strategy design, housing quality and transport policies provide a basis for the scrutiny of neighbour impacts however this policy there is scope to broader Central Agenda and the high level strategic objectives of the Local Plan Core Strategy.

2.7d The policy builds on the ‘agent of change’ principle, whereby it is considered to be the responsibility of the developer of the new use/development to ensure remediation measures to address the potential negative impact on existing lawful uses before it
happens. The agent of change approach will be particularly relevant in the Arc of Opportunity in the borough where new residential development is juxtaposed with existing and intensifying heavy industry, and the airport, and other transport and utilities infrastructure are also operating alongside new and existing housing and in town centres where evening economy uses are increasingly interspersed with residential.

2.8 All scales of development (including domestic extensions, or conversions and changes of use) have the potential to impact upon neighbours and the neighbourhood from the start of construction through to the on-going operation of a site. This policy addresses a range of neighbourliness issues and sets out appropriate responses ranging from designing out (mitigation) to designing in (attention to detail) to contribute positively to neighbourly development. This includes adequate access and egress, connectivity with the local neighbourhood, legibility of refuse and other storage, appropriate parking arrangements as well as the qualitative aspects of street scene, all of which impact local character.

2.9 The social and environmental impacts of development, if inadequately managed or mitigated, can negatively affect the health and well-being of people and the overall ability of a place to function successfully. This policy incorporates requirements of the Healthy Urban Planning Checklist to ensure health and wellbeing and Building for Life Guidance generated from research about people’s feelings about new development and the main issues arising, is properly considered in new development at the building, site and wider neighbourhood level. This includes very specific aspects of housing quality, and public realm [interface] management. As standards improve people will begin to feel more positive about development in their local area, which is in itself a key aspect of achieving neighbourliness.

2.10 Planning is key to ensuring new development does not create problems of conflicting land uses, for example where residential uses are introduced within or adjacent to employment areas. Good planning needs to ensure for instance that local business and the economic life of the Borough is not constrained by noise and fume complaints. Likewise, good telecommunications and broadcasting services are a key component of supporting high quality communications. The siting and design of new developments are expected to consider the interference with broadcasting and telecommunications infrastructure which are a key to the enhancement of modern communities in accordance with the NPPF.

2.10a Larger new development can also significantly affect microclimates, e.g. through downdraughts and wind tunnelling, particularly when tall buildings are constructed. Neighbourly design will be expected to take into account impacts on the surrounding area and minimise—negative restrict—impacts outside the development site that affect the character and quality of the area and the spaces around buildings which people can enjoy, to a minimum. These impacts in turn can have wider health impacts as well as affecting people’s perception and enjoyment of place at all times.

2.11 Good telecommunications and broadcasting services are a key component of supporting high quality communications. The siting and design of new developments are expected to consider the interference with broadcasting and telecommunications infrastructure which are a key to the enhancement of modern communities in accordance with the NPPF.

2.12 The Policy also SP8 point 1f. seeks to reinforce the protection and enhancement of green
infrastructure, in line with broader strategic priorities set out elsewhere in the Local Plan, specifically recognising its relevance in relation to the achievement of neighbourly development due to its environmental and quality of life benefits. In doing so, policy requires proposals to take into account any potential on or off site impacts (both direct and indirect) which could lead to quantitative or qualitative loss of green infrastructure, including private amenity space, trees, woodland, and public open space. This includes adequate consideration of negative impacts on biodiversity elements (e.g. via indirect ecological pathways such as impacts on drainage, habitat connectivity and shadowing). In relation to private amenity space, the policy protects garden land from development that results in its loss, in line with the NPPF and London Plan Policy 3.5, seeking to recognise its role in providing for relief from urban intensity and as places of retreat. Proposals however should seek not simply to avoid such impacts, but to take opportunities to positively contribute to quality, quantity or accessibility of green infrastructure provision on or off site, including where appropriate, improvements to cross boundary accessibility (such as in the case of the Lee Valley Regional Park).

2.13 The environmental standards and design guidance in Table SP.E set out to assist developers in the creation of successful, healthy and safe places through the use of recognised quality benchmarks and standards which in turn are used to help assess developments’ neighbourliness. Such standards play a key part in defining creating, for example, how places can be designed to ensure all that need to, or would benefit from doing so, people can live throughout their lifetime. In line with sustainability objectives and the Council’s resilience agenda a key aspect of more neighbourly development is the extent to which all users can access development with equitable ease.

2.14 All the aspects of the policy work together to impact on the nature of a place, neighbourhood or building, and the extent to which people can live happily, healthily and resiliently. Overall the policy aims to ensure the maximum benefit of development (in accordance with convergence aims) is sought and that development contributes positively to the creation of a high quality built environment and local perception of place.

Implementation

2.14a Overall the policy aims to ensure the maximum benefit of development (in accordance with convergence aims) is sought and that development contributes positively to the creation of a high quality built environment and local perception of place.

2.15 Policy will be implemented primarily via the development management process. Other policies to which there is a logical link are highlighted encouraging responses that deal with the issues in an integrated way. Proposals should be accompanied by statements detailing their response to the components of Neighbourly Development set out in the policy in design and management terms. Information should be sufficient to make adequate assessment against the required guidance and standards. Other policies to which there is a logical link are highlighted encouraging responses that deal with the issues in an integrated way—Where necessary, neighbourliness measures will be secured by condition and/or legal agreement.

2.16 The policy intention is that applicants should pay attention to the environmental, social
and design based impacts of their proposals on neighbourliness within the site and in the immediate area. In positive planning terms, the idea is to maximise the benefit of development through the ways in which it interacts with and plays its part in the wider context. It should encourage, for example car club spaces open to all to reduce parking stress and secure more sustainable travel behaviours in a neighbourhood as a whole, a new development providing a missing walking network link through the site, or a new building for a particular community designed to respond to a more general lack of community space and to be welcoming to all. Early consideration of these matters will be encouraged through pre-application advice/design review and in implementing other consents approaches such as Permission in Principle, as well as through more proactive regeneration and local implementation plan work.

2.16a In promoting an agent of change approach to new development it is important that consultation should take place with existing operators/occupiers to ensure that new development is deliverable and that the two uses are able to operate alongside each other; not just physical neighbours but also river, air and highway traffic regulated by the Port of London Authority (PLA), Civic Aviation Authority (CAA) and Transport for London (TfL) who should also be consulted. It is recognised that the presence of London City Airport in close proximity to high profile regeneration sites creates particular sensitivities in terms of high levels of background noise at these new residential developments. Higher development costs are to be anticipated in these areas because of the necessity for effective design and building interventions that will enable residential development to proceed in areas that might otherwise have been considered unsuitable. Similarly, effective noise insulation of existing housing in the vicinity of the airport is desirable to protect living conditions. At the same time, the Agent of Change approach should not be construed as offering a licence to existing operators and occupiers for the unfettered intensification of disturbance-generating activity or other unreasonable behaviour: it is assumed that uses should be operating lawfully and reasonably.

2.17 To support applications, proposals should pay attention to the quality benchmarks and standards and associated guidance set out in Table 1. Expert advice will be taken within the Council or relevant partners to support these assessments and to ensure proposals are of the highest quality and address Neighbourly Development from the outset, and these benchmarks, standards and guidance documents are important to make that assessment. Where a development concerns an existing building (through conversion, extension, change of use) which does not meet such standards, this will be a consideration in itself as regards its suitability for the proposed change.

Monitoring

2.17a The monitoring framework set out in the Local Plan: Core Strategy covers many aspects of design quality that relate to neighbourliness, including monitoring of housing standards, electric vehicle charging points, flood risk mitigation and design quality auditing, as such, this policy does not have specific output indicators of its own, other than a policy use and robustness requirement. Outcome indicators of particular relevance will be satisfaction with the area, environmental nuisance levels, road traffic casualties, air quality, traffic congestion, and crime/fear of crime levels reported under other policies. Outcomes relating to the wide concept of neighbourliness are difficult to measure, so some indicators (notably community cohesion, satisfaction with the area) are necessarily proxies monitored through corporate surveys. Ongoing informal engagement with residents and elected
members, and complaints data also provides useful feedback on neighbourliness issues. Decisions and appeals monitoring, which can include audits for additional scheme features such as car clubs and electric car charging points also supports assessment of policy relevance and effectiveness.

2.17b Indicators

i. **SP-OP10 Policy Use and Robustness** – in decision-making and at appeal [no specific target; should be using regularly in different types of planning decisions if effective, and supported at appeal];

ii. **SP-OUT1 Successful Place-making and Design:**

   a. Crime and fear of crime [no specific target, should be improving];

   b. Satisfaction with the area [maintain above 75%, should be improving].