EXAMINATION OF LONDON BOROUGH OF NEWHAM LOCAL PLAN

HEARING STATEMENT ON BEHALF OF L&Q

MATTER 4

DRAFT SITE ALLOCATION N2.SA2 (LYLE PARK WEST)

Head Office
29-35 West Ham Lane
Stratford, London E15 4PH

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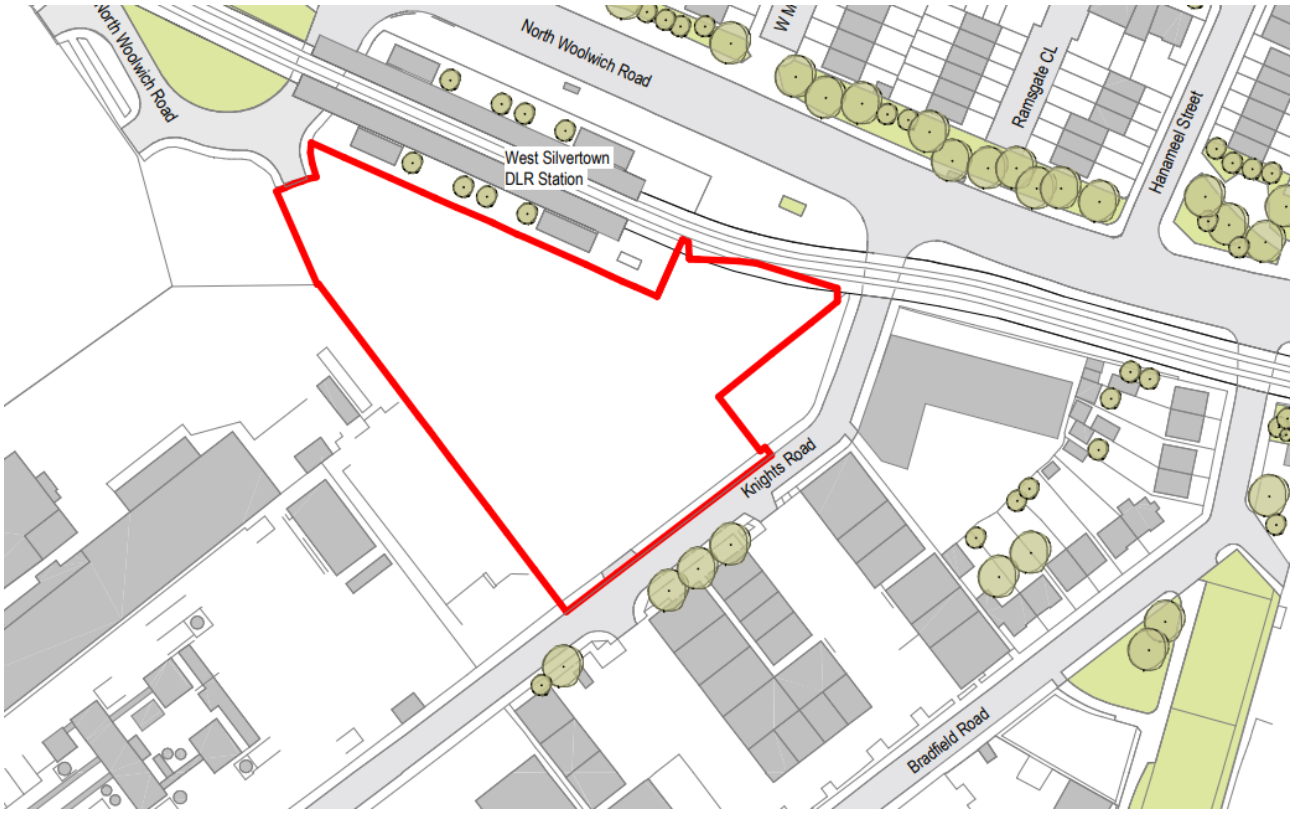
lqgroup.org.uk

Contents

Appendices

1. Introduction

1.1 This Hearing Statement has been prepared by L&Q in regard to our site at Lyle Park West, which is affected by draft site allocation N2.SA2. L&Q has ownership of the land in red below.



1.2 This land has extant planning permission (LPA ref: 19/01791/FUL) for *'Comprehensive redevelopment of site to provide residential-led, mixed-use development of 3no. blocks ranging from 12 to 20 storeys in height comprising 252 residential units (Use Class C3), and new local centre at ground level comprising 1,078sqm (GIA) of flexible commercial floorspace (Use Class A1/A2/A3/D1/D2) with associated new public realm, landscaping, car parking, cycle parking and associated works.'*

1.3 The planning permission was implemented under 23/02432/CLE but has not been fully constructed.

2. Draft Site Allocation N2.SA2

2.1 In providing these representations it is important to set out the planning procedural and policy context. The National Planning Practice Guidance (NPPG) states that *'where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interested parties about the nature and scale of development'* (Reference ID: 61-002-20190315).

2.2 Furthermore, the National Planning Policy Framework (NPPF) states that plans should (inter alia):

'b) be prepared positively, in a way that is aspirational but deliverable; and

d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals' (Paragraph 16).

2.3 The NPPF at Paragraph 132 also states that *'Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable.'*

2.4 As set out in previous representations, this is in the context that national policy (NPPF Paragraph 129 and 130) makes clear the requirement for planning policies to support the efficient use of land, and regional policy (London Plan Policy D1B(2), D3) makes clear that all development must make the best use of land, following a design-led approach that optimises the capacity of sites, including site allocations.

2.5 L&Q broadly supports the overall intention of site allocation N2.SA2 and welcomes the intent to deliver mixed use development on the site, however raises significant concern that the draft allocation fails to comply with these basic requirements of planning policy.

2.6 Most significantly, aspects of draft allocation N2.SA2 are clearly incompatible with an extant planning permission, which is a material planning consideration.

2.7 We note in the Council's Site Allocation and Housing Trajectory Methodology Note (June 2025) at Paragraph 3.3.1 that analysis of site capacity is based on various factors, which includes *'extant planning permissions for the site'*. Moreover, Paragraph 4.4.1 of that document states that where a site has an extant planning permission and there is a design led-capacity testing figure, the higher figure will be used.

2.8 In this respect, we note that site allocation N2.SA2 is identified within the Council's Five Year Housing Land Supply Trajectory (excel document), specifically referencing extant planning permissions 19/01791/FUL and 23/02432/CLE, as well as in the Council's response to the Inspector's Preliminary Question 24. In both, a site capacity of 252 homes is given (reflecting the extant planning permission).

2.9 Notwithstanding the above, the heights within draft allocation N2.SA2 are for building heights of between 21 – 32m (c. 7 – 10 storeys) with taller buildings up to 40m (c. 13 storeys) in certain areas including around the station as part of the Lyle Park Neighbourhood Parade.

2.10 This conflicts with the implemented planning permission which is for heights of 12 to 20 storeys (41 to 66 metres) on the L&Q site (which represents the 'Neighbourhood Parade', noting the position adjacent to the station and ground floor commercial uses in the consented scheme). It also represents a reduction of development potential

against the adopted site allocation S20, which highlights acceptable indicative building heights of 10 to 12 storeys, and up to 18 storeys at key locations including West Silvertown DLR station. In the context of the aforementioned NPPF and London Plan policies which require policies and site allocations to ensure the efficient and design-led optimisation of sites, this is perverse.

2.11 The heights in the draft allocation are derived from the Tall Buildings Annex Newham Characterisation Study (July 2024), however as set out in our Regulation 19 representations and our Matter 3 Hearing Statement, there appears to be a number of significant flaws in the methodology taken.

2.12 It is also clear that the site capacity of 252 homes at L&Q's site as highlighted in the Council's Five Year Housing Land Supply document could not be achieved based on a height limit of 12 storeys/40m as set out in the draft allocation.

2.13 Additional comments regarding the draft site allocation and incompatibility with the extant planning permission are out in our Regulation 19 representations in respect of the incorporation of community facilities and other design considerations.

Changes Sought

2.14 The proposals to amend the draft site allocation wording remain as previously set out in our Regulation 19 representations as per the below (removed text in ~~red strikethrough~~, additional text in **bold blue**):

*'Building heights should range between 21 – 32m (ca. 7 – 10 storeys) with taller buildings up to ~~40~~ **66**m (ca. ~~13~~ **20** storeys) towards the south of the site fronting the river and around the station as part of the Lyle Park Neighbourhood Parade.'*

….

*'Development should address the need for community facilities in the area by **enabling community access to** ~~delivering~~ new ~~community~~ facilities in Lyle Park Neighbourhood Parade to meet local need, unless it can be demonstrated that the needs of the community have already been met. Development should consider of all types of community facility, as set out in the Community Facilities Needs Assessment (2022) evidence base. ~~Any provision of community facilities should meet the requirements of Local Plan Policies SI2 and SI3.~~'*

2.15 The layout shown in the Map on Page 381 should be amended to reflect the extant permission at the L&Q site (approved Site Plan 10782-EPR-00-ZZ-TP-A-0102.P1 shown below).


West Silvertown
DLR Station
Knights Road

3. Summary and Conclusion

3.1 The matters set out in this Hearing Statement indicate that there is significant ambiguity in regard to the draft site allocation N2.SA2 for Lyle Park West, in respect of heights, the requirement to incorporate community uses, and design considerations.

3.2 Notably, these aspects of the allocation as reported in L&Q's Regulation 19 representations and this Hearing Statement are not compliant with the extant planning permission. The draft allocation also reflects a lowering of aspirations in terms of site density and capacity, conflicting with national and regional policy.

3.3 As a minimum, it is imperative that the draft allocation is amended before adoption so that the allocation is compatible with the extant planning permission on site. This will ensure that the allocation includes a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable, and so that it is evident how a decision maker should react to development proposals.

Appendix 1: L&Q Regulation 19 Representations (20th September 2024)

London Borough of Newham
Newham Dockside
1000 Dockside Road
London
E16 2QU

20th September 2024

Sent via email: Localplan@newham.gov.uk

RE: REPRESENTATIONS BY L&Q GROUP TO NEWHAM COUNCIL (LBN) REGULATION 19 CONSULTATION ON NEWHAM LOCAL PLAN (JUNE 2024)

Dear Sir / Madam,

About L&Q

L&Q is one of the UK's leading housing associations and one of the nation's largest residential developers. We own or manage over 105,000 homes across London and the South East across a range of tenures including market sale, private rent, and affordable housing.

L&Q in Newham

L&Q is a major investor and provider of homes in Newham. Across the Borough L&Q owns and manages 9,984 homes.

As a charitable organisation, our role goes beyond providing homes and housing services - we are a long-term partner in the neighbourhoods where we operate. Through the L&Q Foundation Place Makers Fund, we have funded projects within the borough working with Orange Bow Community Interest Company, Future Molds Communities, the Kids Network and Face Front Inclusive Theatre, with grants totalling £75,000. The Learning to Succeed Programme (LTS) is an 'award winning' schools partnership programme delivering wellbeing, Careers and STEM sessions to secondary school aged students. We have delivered sessions to three schools in Newham, Eastlea, London Design and Harris Academy Chobham.

We are owners and managers of our developments, and Newham is a key borough for the future delivery of new homes. Notably, we hold a new development opportunity at Lyle Park West (within draft site allocation N2.SA2) and are also exploring the potential for estate regeneration opportunities where this would be appropriate. We therefore have a long-term interest in ensuring that LBN's Local Plan is successful. It is on this basis that we welcome the opportunity to submit representations.

Overview of Representations

L&Q submitted representations to the previous draft version of the Local Plan in our letter dated 20th February 2023 and welcomes the opportunity to provide further feedback to ensure a clear and robust planning framework for the Borough.

In our Regulation 18 representations we set out our overall support for the vision for the borough set out in the draft Local Plan, but highlighted some specific areas where we considered that amendments were required to make the policies more practical and effective. Having reviewed the amended draft Regulation 19 Local Plan, we do retain concern regarding the practicality and effectiveness of some of the specific development management policies, principally in relation to matters which have the potential to impact on scheme viability. In particular, concern is raised in respect of the following policies:

- BNF2
- D1
- H3
- H4
- J4

We also raise significant concern regarding draft allocation N2.SA2 which covers L&Qs site at Lyle Park West, as well as Policy D4 (and specifically TBZ11) which sets out the associated tall buildings heights for this area.

The detailed comments are appended to this letter (Appendix 1) using the completed LBN representation forms.

These representations are made in the context of Paragraph 35 of the National Planning Policy Framework, to be 'sound', policies must be positively prepared, justified, effective and consistent with national policy.

Future Participation

As a key stakeholder, L&Q welcome the opportunity to contribute to emerging planning policy. We are supportive of LBN's intention to set out its vision for the borough set out in the draft Local Plan, however we do have concerns around the practicalities of draft

allocation N2.SA2 and some of the draft policies and the impact on the viability of development proposals and therefore investment in the borough.

The amendments we have proposed seek to ensure the document is more practical and effective in supporting growth in the borough.

We look forward to confirmation of receipt of these representations and reserve our right to participate in relevant hearing sessions at examination stage.

Yours faithfully,

John Cutler MRTPI

Design and Planning Manager

[redacted]

Response Form for Regulation 19 Consultation.

Newham London	**Local Plan** Publication Stage Response Form	**Ref:** **(For official use only)**

Name of the Local Plan to which this representation relates:	Newham Draft Submission Local Plan

Please return to London Borough of Newham by 5pm 6th September 2024

Privacy Notice

Who we are
London Borough of Newham (LBN) is registered with the Information Commissioner's Office (ICO) as a 'Data Controller' This privacy notice applies to you ('the service user') and LBN ('the Council'). The Council takes the privacy of your information very seriously.

This privacy notice relates to our functions relating to the Newham Local Plan Review Consultation (Regulation 19). It also provides additional information that specifically relates to this particular consultation, and should be read together with our general privacy notice, which provides further detail.

What data do we collect and process
We collect your name, contact details, email address, job title and organisation if applicable and demographic equalities data if you choose to share it.

Why we collect your data
The consultation is a requirement of the Town and Country Planning (Local Planning) (England) Regulations 2012. We collect your data so that we can get your views on the legal compliance or soundness of the Local Plan, as well as its compliance with the duty to co-operate.

The lawful basis for processing your data
The lawful basis we use to process your data as set out in UK data protection legislation is:

Article 6 (a) Consent: the individual has given clear consent for us to process their personal data for a specific purpose.

Article 9 (a) Explicit Consent: the data subject has given explicit consent to the processing of those personal data for one or more specified purposes.

We will only process personal data where we have consent to do so, and you can withdraw your consent at any time. By submitting your personal data in the response form you are consenting for us to process your data and/or consenting to be added to the database. If added to the database, they can be removed upon request.

You can withdraw your consent at any time.

How we use your data
This data is collected, collated and then submitted to the Secretary of State, who will appoint an Inspector to conduct an independent examination of the Local Plan. Demographic data will be processed anonymously to assess the effectiveness of our consultation.

Where you have consented, your contact details will be added to our consultation database for future consultations and updates on the Examination in Public.

At submission representations will be made public on the council's website, including name of person and organisation if applicable making representation. Other personal information will remain confidential.

Representations, in full, submitted along with the Local Plan, evidence base and documents Submission Draft Newham required by legislation to the Planning Inspectorate and to the person the Secretary of State appoints as the Planning Inspector. Contact details will be made available to the Inspector and Programme Officer so they can contact individuals to participate in the Examination.

Consultation database is stored on Mailchimp and accessed by planning policy team only. Mailchimp stores names and email addresses of those on the consultation database in line with Mailchimp policies, particularly its data processing addendum. Please be aware they may store personal data external to the UK specifically in the USA and/or EU.

Who we will share your data with
We will only share your data with the Planning Inspector appointed by the Secretary of State, the Programme Officer appointed by Newham, and within the planning policy team. Your name and organisation (if applicable) will be published on our website along with representations upon submission. Demographic data is not shared with the Planning Inspector or the Programme Officer.

We will not share your personal information with any other third parties unless you have specifically asked us to, or if we have a legal obligation to do so.

How long we will keep your data
We will keep your data safe and secure for a period of 15 year(s)in line with our retention Schedule. After this time, it will be securely destroyed.

How do we protect your data
We comply with all laws concerning the protection of personal information and have security measures in place to reduce the risk of theft, loss, destruction, misuse or inappropriate disclosure of information. Staff access to information is provided on a need-to-know basis and we have access controls in place to help with this.

See the Planning Inspectorate Customer Privacy Notice for details on how they keep your data safe and secure.

Know your rights
We process your data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. Find out about your rights at Your rights – Processing personal data privacy notice – Newham Council or at https://ico.org.uk/your-data-matters/ If you have any queries or concerns relating to data protection matters, please email: **dpo@newham.gov.uk**

Response Form

For guidance on how to complete this representation form please view the Regulation 19 Consultation Guidance https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh.

This form has two parts –
Part A – Personal Details: need only be completed once.
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

	1. Personal Details*	2. Agent's Details (if applicable)
Title	Mr	
First Name	John	
Last Name	Cutler	
Job Title (where relevant)	Design & Planning Manager	
Organisation (where relevant)	L&Q	
Address Line 1	29-35 West Ham Lane	
Line 2	Stratford	
Line 3	London	
Line 4		
Post Code	E15 4PH	
Telephone Number		
E-mail Address (where relevant)	johncutler@lqgroup.org.uk	

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Part B – Please use a separate sheet for each representation

Name or Organisation: L&Q

3. To which part of the Local Plan does this representation relate? (Please be as specific as possible)

Policy	BNF2
Implementation Text	
Paragraph	
Policies Map	

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes		No	
4.(2) Sound	Yes		No	✓
4 (3) Complies with the Duty to co-operate	Yes		No	

Please tick as appropriate

5. Please give details overleaf of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Draft Policy BNF2 states that *'Piecemeal delivery will be resisted, particularly where it would prejudice the realisation of the relevant neighbourhood vision, neighbourhood policy, site allocation development principles and/or site allocation design principles or where the timing of delivery would be unsupported by infrastructure'.* It also states that '*All major applications and applications on site allocations must undertake co-designed site masterplanning, through engagement with different stakeholders.'*

Whilst we support the Council's aspiration to ensure sites are comprehensively designed and fully integrated into areas, using the co-design site masterplanning approach, we do have reservations about how the draft policy is currently worded.

For various reasons, neighbouring sites will come forward for development at different timescales; particularly on commercially sensitive sites, adjoining landowners may be unwilling to engage in a masterplanning process. Given the pressing need for housing, it is important that the Council determine any planning application which is submitted to it on its own merits. It would be perverse for the Council to refuse policy compliant schemes which would help to deliver the development needs of the borough simply because these are brought forward in isolation from adjoining sites (something which is out of the applicant's control). However, this is how the policy is currently worded.

In our view, the policy as drafted would be ineffective and flexibility is required in order to make the policy sound.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Suggested amended wording:

1. *'Sites should be designed and developed comprehensively. Piecemeal delivery* ***of sites in strategic development areas*** *will be resisted~~,~~* ***~~particularly~~*** *where it would prejudice the realisation of the relevant neighbourhood vision, neighbourhood policy, site allocation development principles and/or site allocation design principles or where the timing of delivery would be unsupported by infrastructure.'*

2. ***'Applicants for all ~~All~~*** *major applications and applications on site allocations must* ***seek to*** *undertake co-designed site masterplanning, through engagement with different stakeholders.'*

Please note *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

✓	**No**, I do not wish to participate in hearing session(s)		**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

9. Do you wish to be notified about:

a. the submission of the local plan for independent examination

Yes ☒ No ☐

b. the publication of the Inspector's report

Yes ☒ No ☐

c. the adoption of the Local Plan

Yes ☒ No ☐

10. Would you like to be added to our consultation database to be notified about future planning policy consultations?

Yes ☒ No ☐

Please return to London Borough of Newham by 5pm 6th September 2024

Part B – Please use a separate sheet for each representation

Name or Organisation:	L&Q

3. To which part of the Local Plan does this representation relate? (Please be as specific as possible)

Policy	D1
Implementation Text	'Planning Obligations'
Paragraph	
Policies Map	

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes		No	
4.(2) Sound	Yes		No	✓
4 (3) Complies with the Duty to co-operate	Yes		No	

Please tick as appropriate

5. Please give details overleaf of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

We are concerned by the text under ‘Planning Obligations’ on page 50, which requires the retention of the planning stage architect to completion stage in some instances. This is would lead to a lack of competition when tendering building contracts for the development, and may subsequently cause an impact on the overall viability of the development. For the same reasons, it would also be contrary to our procurement procedure. Additionally, L&Q often seek to appoint a range of architectural practices on multiphase projects in order to introduce a more diverse range of design input. This is particularly relevant to estate regeneration, where we work closely with residents and believe co-design is an important part of the delivery process.

We suggest that the supporting text is amended so that a change in architect is allowed provided this is agreed in writing by the Council.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Suggested amended wording:

'Retention of architect, or architect oversight, to project completion will be secured where it is important to preserve the vision of the original masterplanned design quality in phased developments, ***unless otherwise agreed in writing by the Council****.'*

Please note *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

✓	**No**, I do not wish to participate in hearing session(s)		**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

9. Do you wish to be notified about:

a. the submission of the local plan for independent examination

Yes ☒ No ☐

b. the publication of the Inspector's report

Yes ☒ No ☐

c. the adoption of the Local Plan

Yes ☒ No ☐

10. Would you like to be added to our consultation database to be notified about future planning policy consultations?

Yes ☒ No ☐

Please return to London Borough of Newham by 5pm 6th September 2024

Part B – Please use a separate sheet for each representation

Name or Organisation: L&Q

3. To which part of the Local Plan does this representation relate? (Please be as specific as possible)

Policy	H3
Implementation Text	
Paragraph	
Policies Map	

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes		No	
4.(2) Sound	Yes		No	✓
4 (3) Complies with the Duty to co-operate	Yes		No	

Please tick as appropriate

5. Please give details overleaf of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The draft Policy H3.1 requirements are very onerous and challenging, particularly when we are replacing housing in poor condition while delivering a policy-compliant mix to the uplift of any estate regeneration proposals, recognising the contribution that such schemes make to Newham's broader policy objectives to improve housing quality across the borough. The proposed mix of new homes should also be seen in the wider context of creating sustainable communities, with consideration should be given to the surrounding tenures.

Additionally, we raise concern that the draft policy does not conform to the London Plan (2021).

Specifically, the policy requires all major residential developments to provide 60% affordable housing overall, subject to viability. In our view, this comprises a conflict with London Plan Policy H5, which sets out the threshold approach to applications in which case viability testing would not be required (the 'fast track route', which includes at part B, a requirement for a minimum of 35% affordable homes to be provided in most instances).

In addition, of the draft 60% affordable housing requirement, the proposal is that 50% would be required for social rented housing and 10% as 'affordable home ownership housing'.

Firstly, it is highlighted that on this basis, the affordable housing split would be 83% social rent and 17% intermediate tenure. This would represent a clear conflict with Policy H6.A(2) of the London Plan, which requires a minimum 30% of affordable homes to be provided as intermediate tenure. Under London Plan Policy H6.A, a maximum 70% of affordable homes can be required for social rented housing.

Secondly, draft Policy H3.1 appears to require all affordable housing other than social rented properties (i.e. intermediate tenure) to be provided as 'affordable home ownership'. This would also represent a clear conflict with Policy H6.A(2) of the London Plan, which indicates that the minimum 30% should be applied to any intermediate product, for instance including London Living Rent. Whilst paragraph 4.6.5 of the London Plan states that London Living Rent can be considered as an affordable homeownership product, it is typically viewed as a rental product, and so there is considered to be some ambiguity in draft Policy H3.1 referring to 'affordable home ownership housing'. For clarity, it is considered that the policy should refer simply to 'intermediate tenures'.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Suggested amended wording:

1. 'Newham's policy priority is the provision of more social rent homes. Residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) ***~~or more should~~ are encouraged to optimise the potential for affordable homes on site. Of the affordable homes provided, ~~50~~ 70*** *per cent* ***~~of the total residential units~~ should be provided*** *as social rent housing and* ***~~10~~ 30*** *per cent* ***~~of the total residential units~~*** *as* ***~~affordable home ownership housing~~ intermediate tenures.*** *Developments that do not meet these requirements and the delivery of the required level of family dwellinghouses (C3) under Local Plan Policy H4.2 will not be supported unless accompanied by a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered.'*

Please note *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

✓	**No**, I do not wish to participate in hearing session(s)		**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

9. Do you wish to be notified about:

a. the submission of the local plan for independent examination

Yes ☒ No ☐

b. the publication of the Inspector's report

Yes ☒ No ☐

c. the adoption of the Local Plan

Yes ☒ No ☐

10. Would you like to be added to our consultation database to be notified about future planning policy consultations?

Yes ☒ No ☐

Please return to London Borough of Newham by 5pm 6th September 2024

Part B – Please use a separate sheet for each representation

Name or Organisation:	L&Q

3. To which part of the Local Plan does this representation relate? (Please be as specific as possible)

Policy	H4
Implementation Text	
Paragraph	
Policies Map	

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes		No	
4.(2) Sound	Yes		No	✓
4 (3) Complies with the Duty to co-operate	Yes		No	

Please tick as appropriate

5. Please give details overleaf of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The proposed housing mix (Policy H4) is currently very rigid, particularly in terms of setting a maximum level of 1-bedroom units and minimum level for 3-bedroom+ units, and the proposed 40% 3 bed requirement is extremely onerous. Not all locations are suited to family housing, and this is particularly true of private sale homes, which are required to provide cross-subsidy to affordable rented tenures. Indeed, the London Plan at Policy H10.A indicates that local planning authorities should provide an appropriate mix of unit sizes based on various factors, including (inter alia):

(6) the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity
7) the aim to optimise housing potential on sites
8) the ability of new development to reduce pressure on conversion, sub-division and amalgamation of existing stock
9) the need for additional family housing and the role of one and two bed units in freeing up existing family housing.

It is suggested that the policy incorporates some flexibility for sites to be suitably optimised, particularly in light of the factors highlighted at London Plan Policy H10.A. In particular, flexibility also be given to infill housing on estates that meet broader policy objectives.

In addition, the requirement for a financial viability assessment in cases where the level of family size units is not met, appears to be irrespective of the level of affordable housing proposed. The significantly onerous requirements of draft Policy H4, in combination with draft Policy H3.1 (as currently worded) would in combination likely mean than no policy compliant scheme could come forward in the borough. This would result in the disproportionate need for effectively all schemes to be viability tested, and also is likely to disincentivise development in some instances. For these reasons, it is considered that draft Policy H4 is not effective.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Suggested amended wording:

*'2. New residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should deliver 40 per cent of the number of new residential units as family dwellinghouses (C3) with three or more bedrooms**, unless circumstances indicate that this is not appropriate to the location**.*
Developments that do not meet these requirements on site and the delivery of the required level of affordable housing under Local Plan Policy H3.1 will not be supported unless and accompanied by a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered.'

Please note *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

✓	**No**, I do not wish to participate in hearing session(s)		**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

9. Do you wish to be notified about:

d. the submission of the local plan for independent examination

Yes ☒ No ☐

e. the publication of the Inspector's report

Yes ☒ No ☐

f. the adoption of the Local Plan

Yes ☒ No ☐

10. Would you like to be added to our consultation database to be notified about future planning policy consultations?

Yes ☒ No ☐

Please return to London Borough of Newham by 5pm 6th September 2024

Part B – Please use a separate sheet for each representation

Name or Organisation:	L&Q

3. To which part of the Local Plan does this representation relate? (Please be as specific as possible)

Policy	J4
Implementation Text	
Paragraph	
Policies Map	

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes		No	
4.(2) Sound	Yes		No	✓
4 (3) Complies with the Duty to co-operate	Yes		No	

Please tick as appropriate

5. Please give details overleaf of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Draft Policy J4.1(c) requires, as a minimum, all major developments with commercial floorspace to secure 35% of all construction phase, and 50% of all end-user phase jobs for Newham residents.

Considering L&Q's experience providing construction and apprenticeship jobs on its in-house construction sites, and our experience of managing commercial properties, we are very concerned that these levels are not realistic. In particular, the requirement for end-user phase jobs would likely disincentivise potential tenants from occupying commercial space within new developments, resulting in vacant premises which provide no value to the area. For this reason, it is considered that draft Policy J4.1(c) is not effective.

We suggest 20% jobs for Newham residents for both the construction and end-user stages is a more appropriate target.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Suggested amended wording:

'c. as a minimum, all major developments must help Newham residents access high quality employment in the construction or/and end-user stage by providing a tariff-based contribution and an Employment Strategy which ***~~secures~~ targets ~~35~~ 20*** *per cent construction phase (all major developments) and* ***~~50 per cent~~*** *end-user phase jobs (for all developments delivering employment floorspace) for Newham residents.'*

(Continue on a separate sheet /expand box if necessary)

Please note *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

✓	**No**, I do not wish to participate in hearing session(s)		**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

9. Do you wish to be notified about:

a. the submission of the local plan for independent examination

Yes ☒ No ☐

b. the publication of the Inspector's report

Yes ☒ No ☐

c. the adoption of the Local Plan

Yes ☒ No ☐

10. Would you like to be added to our consultation database to be notified about future planning policy consultations?

Yes ☒ No ☐

Please return to London Borough of Newham by 5pm 6th September 2024

Part B – Please use a separate sheet for each representation

Name or Organisation:	L&Q

3. To which part of the Local Plan does this representation relate? (Please be as specific as possible)

Policy	D4
Implementation Text	
Paragraph	TBZ11
Policies Map	

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes		No	
4.(2) Sound	Yes		No	✓
4 (3) Complies with the Duty to co-operate	Yes		No	

Please tick as appropriate

5. Please give details overleaf of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

As a matter of principle, L&Q is concerned that heights are identified in draft Policy D4 within the identified Tall Buildings Zones as absolute maximums. Whilst we note the wording set out at 3.9.2 of the London Plan (in support of Policy D9), London Plan Policy D3 also requires all development to make the best use of land by following a design-led approach that optimises the capacity of sites. Consequently, it is considered that flexibility should be included to enable these maximum heights to be breached where a scheme delivers significant public benefits as a result.

The NPPF at Paragraph 132 states that *'Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable.*' Draft Policy D4 (and specifically in respect of Tall Building Zone 'TBZ11: Lyle Park West') clearly fails to achieve these requirements by virtue of the fact that the heights set out are incompatible with an extant planning permission, which is a material planning consideration.

Tall Building Zone 'TBZ11: Lyle Park West' states that prevailing heights should be between 21m and 32m (ca. 7-10 storeys), and that there is an opportunity to include tall building elements up to 40m (ca. 13 storeys) in proximity to the riverside and to mark the new Neighbourhood Parade at West Silvertown DLR.

However, in January 2021 planning permission was granted in respect of the north western part of the allocation site (L&Q's ownership) for 'Comprehensive redevelopment of site to provide residential-led, mixed-use development of 3no. blocks ranging from 12 to 20 storeys in height comprising 252 residential units (Use Class C3), and new local centre at ground level comprising 1,078sqm (GIA) of flexible commercial floorspace (Use Class A1/A2/A3/D1/D2) with associated new public realm, landscaping, car parking, cycle parking and associated works.' (LPA ref: 19/01791/FUL). The implementation of the planning permission was confirmed in application LPA ref: 23/02432/CLE.

Draft Policy D4 in respect of TBZ11 also represents a reduction of development potential against the adopted site allocation S20, which highlights acceptable indicative building heights of 10 to 12 storeys and up to 18 storeys at key locations including West Silvertown DLR station.

The committee report for the planning permission 19/01791/FUL (at paragraph 7.2.80) makes clear that the consented heights were appropriate cognisant of the 2018 allocation and the policies of the 2021 London Plan. Paragraph 7.6.7 to 7.6.9 provides further detail, notably stating that *'The height is appropriate in relation to the existing and emerging context and in relation to the spatial hierarchy of the area and the borough, and in relation to the scale of the street and the adjacent public space and DLR infrastructure.'*

The reduction of the development potential of the allocation site is perverse given the worsening housing need, and is contrary to London Plan Policy D3, which seeks the design-led optimisation of development sites.

The tall buildings zones designations derive from the Tall Buildings Annex Newham Characterisation Study (July 2024). However, a review of this document raises issues in the methodology taken, and the application of the methodology:

- Firstly, Figure 12 seeks to show tall buildings under construction in Newham, however this does not include the L&Q development at LPW, despite the fact that the scheme has been implemented in planning terms (LPA ref: 23/02432/CLE). This fundamentally means that the approach taken to assessing TBZ11 is flawed. In any case, a logical approach would be to

identify any extant planning permissions (rather than only sites under construction). This does not appear to have been done.

- Secondly, adopted site allocation S20 highlights acceptable indicative building heights of 10 to 12 storeys and up to 18 storeys at key locations including West Silvertown DLR station. Adopted site allocations are identified at Figures 34 and 37, however no detail is provided in respect of established heights for those site allocations, and it is unclear how the existence of existing allocations has informed the study.

- Thirdly, TBZ11 is treated differently than the land to the west which is identified as appropriate for heights of up to 50m (with TBZ11 as suitable for 21 – 32m (7 – 10 storeys)), as shown at Figure 42 on Page 61. This approach appears to derive from Figure 26 which shows a different sensitivity rating to TBZ11 compared to the land to the west, although there does not appear to be any justification to support this. Significantly, both areas are identified at Figure 36 as having low sensitivity to change, and in the Townscape Assessment (June 2024) at Page 78 as areas 'not sensitive to change'.

For the reasons set out above, it is considered that draft policy D4 (specifically TBZ11) is unsound as (with reference to NPPF Paragraph 35) it is not justified or effective.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Suggested amended wording:

'2. Tall buildings will only be acceptable, subject to detailed design and masterplanning considerations, in areas designated as 'Tall Building Zones'. The height of tall buildings in any 'Tall Building Zone' should be proportionate to their role within the local and wider context and should not exceed the respective limits set in Table 1 below ***unless justified by public benefits****.'*

It is suggested that in Table 1, *'Height Range Maximum'* is replaced with *'****Indicative*** *Height Range Maximum'.*

Additionally, the evidence base which supports the tall buildings assessment should be reviewed to address the comments raised. As a minimum, TBZ11 should enable compatibility with extant consent on the L&Q site. Suggested amended wording:

'Indicative Height Range Maximum: ~~***40***~~ ***66****m (ca.* ~~***13***~~ ***20*** *storeys)'*

Further guidance: 'Opportunity to include tall building elements up to ~~***40***~~ ***66****m (ca.* ~~***13***~~ ***20*** *storeys) in proximity to the riverside and to mark the new Neighbourhood Parade at West Silvertown DLR.'*

Please note *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

	No, I do not wish to participate in hearing session(s)	✓	**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

L&Q is a major investor and provider of homes in Newham, and notably, we hold new development opportunity at Lyle Park West (within TBZ11). For the reasons set out in the form, we have significant concerns with the soundness of the draft allocation which warrant discussion.

Please note *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

9. Do you wish to be notified about:

a. the submission of the local plan for independent examination

Yes ☒ No ☐

b. the publication of the Inspector's report

Yes ☒ No ☐

c. the adoption of the Local Plan

Yes ☒ No ☐

10. Would you like to be added to our consultation database to be notified about future planning policy consultations?

Yes ☒ No ☐

Please return to London Borough of Newham by 5pm 6th September 2024

Part B – Please use a separate sheet for each representation

Name or Organisation:	L&Q

3. To which part of the Local Plan does this representation relate? (Please be as specific as possible)

Policy	N2.SA2: Lyle Park West
Implementation Text	
Paragraph	
Policies Map	

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes		No	
4.(2) Sound	Yes		No	✓
4 (3) Complies with the Duty to co-operate	Yes		No	

Please tick as appropriate

5. Please give details overleaf of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

As set out in national planning practice guidance, where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interested parties about the nature and scale of development (Reference ID: 61-002-20190315). The NPPF at Paragraph 132 also states that 'Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable.' The draft allocation N2.SA2 clearly fails to achieve these requirements by virtue of the fact that aspects of the draft allocation are incompatible with an extant planning permission, which is a material planning consideration.

In January 2021 planning permission was granted in respect of the north western part of the allocation site (L&Q's ownership) for 'Comprehensive redevelopment of site to provide residential-led, mixed-use development of 3no. blocks ranging from 12 to 20 storeys in height comprising 252 residential units (Use Class C3), and new local centre at ground level comprising 1,078sqm (GIA) of flexible commercial floorspace (Use Class A1/A2/A3/D1/D2) with associated new public realm, landscaping, car parking, cycle parking and associated works.' (LPA ref: 19/01791/FUL). The implementation of the planning permission was confirmed in application LPA ref: 23/02432/CLE.

The draft allocation states that building heights should range between 21 – 32m (ca. 7 – 10 storeys) with taller buildings up to 40m (ca. 13 storeys) in certain areas including around the station as part of the Lyle Park Neighbourhood Parade. This aligns with draft policy D4 (TBZ11), however, this conflicts with the implemented planning permission for heights of 12 to 20 storeys (41 to 66 metres) on the L&Q site. It also represents a reduction of development potential against the adopted site allocation S20, which highlights acceptable indicative building heights of 10 to 12 storeys and up to 18 storeys at key locations including West Silvertown DLR station.

The committee report for the planning permission 19/01791/FUL (at paragraph 7.2.80) makes clear that the consented heights were appropriate cognisant of the 2018 allocation and the policies of the 2021 London Plan. Paragraph 7.6.7 to 7.6.9 provides further detail, notably stating that 'The height is appropriate in relation to the existing and emerging context and in relation to the spatial hierarchy of the area and the borough, and in relation to the scale of the street and the adjacent public space and DLR infrastructure.'

The reduction of the development potential of the allocation site is perverse given the worsening housing need, and is contrary to London Plan Policy D3, which seeks the design-led optimisation of development sites.

The tall buildings zones designations derive from the Tall Buildings Annex Newham Characterisation Study (July 2024). However, a review of this document raises issues in the methodology taken, and the application of the methodology:

- Firstly, Figure 12 seeks to show tall buildings under construction in Newham, however this does not include the L&Q development at LPW, despite the fact that the scheme has been implemented in planning terms (LPA ref: 23/02432/CLE). This fundamentally means that the approach taken to assessing TBZ11 is flawed. In any case, a logical approach would be to identify any extant planning permissions (rather than only sites under construction). This does not appear to have been done.

- Secondly, adopted site allocation S20 highlights acceptable indicative building heights of 10 to 12 storeys and up to 18 storeys at key locations including West Silvertown DLR station. Adopted site allocations are identified at Figures

34 and 37, however no detail is provided in respect of established heights for those site allocations, and it is unclear how the existence of existing allocations has informed the study.

- Thirdly, TBZ11 is treated differently than the land to the west which is identified as appropriate for heights of up to 50m (with TBZ11 as suitable for 21 – 32m (7 – 10 storeys)), as shown at Figure 42 on Page 61. This approach appears to derive from Figure 26 which shows a different sensitivity rating to TBZ11 compared to the land to the west, although there does not appear to be any justification to support this. Significantly, both areas are identified at Figure 36 as having low sensitivity to change, and in the Townscape Assessment (June 2024) at Page 78 as areas 'not sensitive to change'.

The draft allocation states that development should address the need for community facilities in the area by delivering new community facilities in Lyle Park Neighbourhood Parade to meet local need, and the Map on Page 381 shows that this would relate to the L&Q site. However, this is incompatible with extant and implemented planning permission 19/01791/FUL, which includes did not include any community facilities, but did include a condition requiring community access to non-residential floorspace.

The layout shown in the Map on Page 381 is not marked as illustrative or diagrammatic, and so it is assumed that the intention is for any development proposals to closely align with these layout principles. This causes issues, as the layout principles shown are incompatible with extant and implemented planning permission 19/01791/FUL, notably areas of green space along the south western site boundary. It is suggested that the layout shown in the Map on Page 381 is amended to reflect the extant permission at the L&Q site.

For the reasons set out above, it is considered that draft allocation is unsound as (with reference to NPPF Paragraph 35) it is not justified or effective.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Fundamentally, the evidence base which supports the tall buildings assessment should be reviewed to address the comments raised. As a minimum, the site allocation should enable compatibility with extant consent on the L&Q site. Suggested amended wording:

'Building heights should range between 21 – 32m (ca. 7 – 10 storeys) with taller buildings up to ~~***40***~~ ***66****m (ca.* ~~***13***~~ ***20*** *storeys) towards the south of the site fronting the river and around the station as part of the Lyle Park Neighbourhood Parade.'*

Reference to providing community uses as part of the Neighbourhood Parade should be amended to be compatible with the extant consent on the L&Q site:

'Development should address the need for community facilities in the area by ***enabling community access to*** ~~***delivering***~~ *new* ~~***community***~~ *facilities in Lyle Park Neighbourhood Parade to meet local need, unless it can be demonstrated that the needs of the community have already been met. Development should consider of all types of community facility, as set out in the Community Facilities Needs Assessment (2022) evidence base.* ~~***Any provision of community facilities should meet the requirements of Local Plan Policies SI2 and SI3***~~*.'*

The layout shown in the Map on Page 381 should be amended to reflect the extant permission at the L&Q site.

Please note *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

	No, I do not wish to participate in hearing session(s)	✓	**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

L&Q is a major investor and provider of homes in Newham, and notably, we hold new development opportunity at Lyle Park West (within draft site allocation N2.SA2). For the reasons set out in the form, we have significant concerns with the soundness of the draft allocation which warrant discussion.

Please note *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

9. Do you wish to be notified about:

d. the submission of the local plan for independent examination

Yes ☒ No ☐

e. the publication of the Inspector's report

Yes ☒ No ☐

f. the adoption of the Local Plan

Yes ☒ No ☐

10. Would you like to be added to our consultation database to be notified about future planning policy consultations?

Yes ☒ No ☐

Please return to London Borough of Newham by 5pm 6th September 2024