

LONDON BOROUGH OF NEWHAM

LOCAL PLAN INDEPENDENT EXAMINATION IN PUBLIC IN7: ACTION POINTS FROM WEEK 2 HEARING SESSIONS

WE ARE NEWHAM.

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

The Plan's policies

AP1. Council to draft a potential modification to paragraph i.29 to state which parts of the Plan are policies

Council Response:

1.1 The following modifications are proposed to para i.29.

i.29 The Local Plan, together with the London Plan, make up the borough's development plan and will be used to make decisions on planning applications. The Plan must be read as a whole and all policies **(shown in shaded boxes, identified by their Policy reference)** relevant to the proposal will be used to assess its compliance and acceptability. **The text surrounding the policy boxes including the introductory paragraphs, Planning Obligations, Justification and Implementation provides important context, evidence, explanation and guidance on how the policies should be interpreted and applied.**

Examples of how the Strategic, Neighbourhood and Site Allocation policies will be displayed in the plan to avoid ambiguity for the purposes of section 17 of the 2004 Act, are set out below.

Example of a Strategic Policy

<p>Policy BFN1: Spatial strategy</p> <p>1. Development will be directed to all of Newham's 17 neighbourhoods to distribute the benefits of growth, achieve Community Wealth Building outcomes and create a network of successful and well-connected neighbourhoods. This will be achieved through:</p> <p>a. directing significant levels of growth to:</p> <p>i. the six neighbourhoods in the Royal Docks and Beckton Riverside Opportunity Area, which have the potential to deliver 36,000 new homes and 55,000 new jobs up to 2041, unlocked by an extension to the DLR and the delivery of two new DLR stations; and</p> <p>ii. the N6 Manor Road and N7 Three Mills neighbourhoods alongside the River Lea, which form part of the cross-boundary Poplar Riverside Opportunity Area, which has a potential to deliver 9,000 new homes and 3,000 new jobs by 2042, supported and connected by a series of new bridges; and</p> <p>iii. the N8 Stratford and Maryland neighbourhood, supported by a redesigned Stratford Station.</p> <p>b. supporting incremental change in the N9 West Ham, N10 Plaistow, N11 Beckton, N12 East Ham South, N13 East Ham, N14 Green Street, N15 Forest Gate and N16 Manor Park</p>	<p>and Little Ilford neighbourhoods through the enhancement of each neighbourhoods' character and the delivery of site allocations.</p> <p>2. Development will make the best use of land, optimise sites and deliver sustainable development by:</p> <p>a. applying a design-led approach which responds to the site's surrounding character and context; and</p> <p>b. supporting tall buildings in the borough's Tall Building Zones; and</p> <p>c. conserving and enhancing the borough's heritage assets and settings; and delivering zero carbon, climate resilient and nature-friendly developments.</p> <p>3. Development will create new jobs and deliver a modern, greener and inclusive economy by:</p> <p>a. protecting and intensifying the borough's Strategic Industrial Locations and Local Industrial Locations for a diverse range of industrial and storage, logistics and distribution and related uses; and</p> <p>b. directing employment-led development to the borough's Local Mixed-Use Areas to deliver light industrial, small-scale office and workspace; and</p> <p>c. protecting and supporting low-cost workspace in the borough's Micro Business Opportunity Areas; and</p>	<p>d. directing major office floorspace to Stratford Metropolitan Centre and smaller-scale offices to the Major and District Centres; and</p> <p>e. requiring new employment floorspace on identified site allocations; and</p> <p>f. supporting the location of industrial uses on out-of-centre retail and leisure parks; and</p> <p>g. supporting new workspaces in locations which complete a gap in the network of well-connected employment uses.</p> <p>4. Development will meet the retail and leisure needs of residents, workers and visitors by</p> <p>a. Directing main town centre uses to the borough's network of Metropolitan, Major, District and Local Centres and supporting their diversification and in some cases expansion; and</p> <p>b. creating a new District Centre on N17.SA1 Beckton Riverside site allocation; and</p> <p>c. creating new Local Centres on N2.SA3 Connaught Riverside, N2.SA4 Thameside West, N7.SA2 Twelvetreets Park and Former Bromley By Bow Gasworks, N7.SA3 Sugar House Island and N8.SA9 Pudding Mill; and</p> <p>d. creating expanded Local Centres on N1.SA2 Rymill Street, N2.SA1 Silvertown Quays and N9.SA1 Plaistow North; and e. protecting and expanding the borough's network of Neighbourhood Parades to ensure the delivery of a network of well-connected neighbourhoods.</p>
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Example of a Neighbourhood Policy

Policy N1: North Woolwich

The vision for North Woolwich will be achieved by:

1. supporting development in 'enhance' areas that enhances the character and legibility of the neighbourhood and provides a moderate uplift in density through a range of typologies appropriate to the site's context;
 2. supporting development that conserves the character of the Barge House Road/Woolwich Manor Way Areas of Townscape Value and the neighbourhood's heritage assets, including the locally listed former police station and the Royal Standard pub, through sympathetic form, materials, detail, landscaping and public realm enhancements;
 3. supporting the transformation of N1.SA1 North Woolwich Gateway, while remaining in keeping with the site's context, including heritage assets, and N1.SA2 Rymill Street, in accordance with the Store Road/Pier Road and King George V/Pier Parade Tall Building Zones and Local Plan Policy D4;
 4. improving public realm, increasing urban greening and reducing the dominance of road infrastructure on Pier Road and at the ferry terminal;
 5. requiring development to respond to and complement the materials and detailing of the neighbourhood, for example considering the appropriate use of red, buff and glazed brick and pre-cast detailing;
 6. appropriate mitigation and buffering between residential and industrial uses;
 7. requiring developments in the Royal Docks Enterprise Zone that deliver new employment
8. floor space to support the London Living Wage designation; intensifying the neighbourhood's industrial land, particularly for small and medium enterprises, green and low carbon industries and low-cost industrial space;
 9. supporting the refurbishment of the former Tate Institute to provide a community facility and/ or affordable workspace for small and medium enterprises and cultural and creative industries;
 10. protecting the existing and potential capacity and operability of Thames Refinery Wharf;
 11. enhancing the role of the North Woolwich Local Centre to positively contribute in serving the local catchment needs for retail, leisure, services and community uses by:
 - a. supporting an improved retail and leisure offer within its primary shopping area, including a new small to medium food store and a parade of small commercial units on Rymill Street as part of N1.SA2 Rymill Street;
 - b. improving the local centre's public realm to create a high-quality, accessible legible and animated public realm with a greener Pier Parade square and quality walking and cycling links to the DLR stations and the wider neighbourhood;
 - c. supporting temporary or pop-up uses such as street markets in Pier Parade square;
 12. supporting new community facilities when in conformity with Local Plan Policy S12;

Example of Site Allocation Policy

Policy N2.SA1 Silvertown Quays

Development principles

1. Residential, employment uses, main town centre uses and social infrastructure, including community facilities, sports and recreation facilities, education, and open space.
2. The employment uses should be consistent with Local Plan Policy J1 and prioritise industrial floorspace in the form of workspace for cultural and creative production maker space and warehousing and distribution uses.
3. The type and quantity of main town centre uses should extend and complement existing provision at Silvertown Local Centre and should remain consistent with a local centre designation and Local Plan Policy HS1. The site should also provide a small to medium sized food store to meet local need, subject to passing the Impact Assessment. Development should address the need for community facilities in the area by delivering new community facilities in Silvertown Local Centre, unless it can be demonstrated that the needs of the community have already been
4. 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 S12 and S13.

5. Sports and recreation facilities in the form of water-related and water-dependent activities will be supported. These uses may be supported by small-scale ancillary uses such as food and drink uses around the water.
6. Development proposals should ensure that flood risk is minimised, mitigated and informed by a site-specific Flood Risk Assessment, as per Local Plan Policy CE7 and informed by the Strategic Flood Risk Assessment Level 2 Site Assessment (2023).

Design principles

7. The site should be designed and developed comprehensively in accordance with Local Plan Policy BFN2.
8. Building heights should range between 21 – 32m (ca. 7-10 storeys) with taller buildings up to 50m (ca. 16 storeys). Massing should step down towards the south west of the site to sensitively integrate with the low-rise context on Mill Road.
9. The location of frontages and public realm as part of the extension to Silvertown Local Centre should help create a continuous centre by connecting to the existing designated Primary Shopping Area at Admiralty Avenue, via Pontoon Dock DLR Station and surrounding public realm on North Woolwich Road to the River Thames. Main town centre uses should be located towards North Woolwich Road

with the industrial workspace for cultural and creative production maker space located towards Millennium Mills.

10. Development should conserve and enhance the locally listed Millennium Mills and Grade II Silo D, which is on the Heritage at Risk Register, and their settings, in accordance with Local Plan Policy D9.
11. The layout of the site should increase access to the water, create high quality, green public realm along the dock edge and maintain the open character of the water and protect the Site of Importance for Nature Conservation. Water related and water-dependent activities should activate the water at Pontoon Dock.
12. The design and layout of the site should establish a connected network of streets and spaces that connects to the existing street network and should create a street hierarchy. Routes through, and to and from, the site should improve access and connectivity across the dock, along the dock edge, to the DLR station and to Royal Wharf. Separate HGVs and pedestrian access should be designed to avoid conflicts between different uses, particularly where servicing the employment uses. Greenspace provision should enhance connectivity north to south and connect the site to Thames Barrier Park.

Viability

AP2. Council to advise which policies it would suggest be modified, and how, if I concluded that the Plan is not sound because the viability evidence indicates that the total cumulative cost of all relevant policies will undermine deliverability.

Council Response:

- 2.1 The Council acknowledges the Inspector's concerns regarding viability evidence, particularly in relation to the total cumulative cost of all relevant policies that may undermine deliverability.
- 2.2 The Council is currently considering modifications to ensure that the emerging affordable housing policy is more closely aligned with the London Plan. A meeting with the Corporate Management Team will be held in the New Year to:
- Review potential changes to the Local Plan.
 - Ensure the Local Plan delivers on the Council's corporate priority for social housing.
 - Maintain consistency with regional policy requirements.
 - Safeguard the overall soundness of the Local Plan.
- 2.3 This process will help strengthen the Council's commitment to delivering affordable housing while ensuring compliance with broader regional planning framework
- 2.4 The Council proposes to amend its tall buildings policy to emphasise appropriate heights, rather than imposing maximum height thresholds. In short, this modification strengthens viability by embedding flexibility, reducing risk, and enabling schemes to adapt to both local context and market realities — while still safeguarding design quality and community outcomes.
- 2.5 The Council proposes to amend paragraph 4.3 to clarify the role of neighbourhood policies and site allocations, embedding flexibility to ensure deliverability. Explicitly stating that flexibility may be applied based on the agreed viability position ensures that developments remain financially feasible. This balances aspirations with deliverability, enabling schemes to proceed even when full compliance is not achievable. In addition, allowing alternative layouts or approaches to delivering required land uses and infrastructure will be considered where robust justification is provided, ensuring schemes can respond effectively to site-specific constraints (such as contamination or abnormal development costs). This prevents rigid requirements from undermining deliverability.
- 2.6 The Council proposes amendments to prescriptive nature of site allocation policy wording, particularly in relation to open space provision to allow flexibility in the delivery of open space. This approach ensures that green space provision remains consistent with policy requirements while enabling adaptable responses to individual site circumstances.
- 2.7 The Council wishes to emphasise the importance of Policy BFN4 in balancing policy objectives with deliverability. To address viability concerns, BFN4 permits adjustments to policy requirements where robust evidence demonstrates that full compliance is not achievable. The policy establishes a clear hierarchy of priorities:
1. Affordable and family housing – responding to Newham's acute housing need.
 2. Employment and training – supporting inclusive growth.
 3. Infrastructure delivery – coordinated through the Infrastructure Delivery Plan (IDP).
- 2.8 Policy BFN4 provides flexibility by allowing prioritisation to shift where critical infrastructure is necessary to unlock development or where statutory consultees require it. This approach

ensures that proposals remain viable and deliverable, while still contributing meaningfully to the Plan's strategic objectives and safeguarding its long-term vision.

Policy H1 Meeting housing needs

AP3. Council to amend the proposed modifications² to policy H1 part 1 and reasoned justification in paragraph 3.174 to:

- a) Refer to “minimum housing requirement” (in policy H1 part 1, as appropriate).
- b) Refer to “minimum annual target” (in the table setting out the targets for the 3 delivery periods).
- c) Clarify that the London Plan target applies in the period from the adoption of the Plan until 31 March 2029 (ie not only from 1 April 2027 onward).
- d) Refer to the number of completions in the period 2019 to 2025 and the total shortfall against the London Plan for that period (in paragraph 3.174).

Council Response:

3.1 Please see below suggested modifications to address these action points (AP3a-d):

[Policy H1] 1. Newham will enable a net increase of between ~~51,425 and 53,784~~ **45,611 and 53,954** quality residential units between ~~20237 and 2038~~ **20237 and 2038**. This will be achieved through:

- a. the majority of new residential units being brought forward on site allocations; and
- b. the optimisation of housing delivery on sites below 0.25 hectares in size; and
- c. supporting residential developments that come forward on windfall sites (unallocated or undesignated land) unless other policies within the Local Plan direct otherwise.

Supply will be measured through a stepped trajectory, based on the minimum housing requirement of 45,611, with a different minimum annual target for every phase of the Plan, as follows:

Delivery Period	Years	Minimum Annual Target
Phase 1a (Short term – 2021 London Plan period)	27/28 – 28/29	4,760
Phase 1b (Short term)	29/30 – 31/32	2,542
Phase 2 (Medium term)	32/33 – 36/37	2,631
Phase 3 (Long term)	37/38 – 41/42	3,062

[Paragraph 3.174] Newham has a significant strategic role to play in delivering new homes to meet both the borough's and London's wider need for housing. **As part of the London Plan (2021), Newham has been set a strategic housing target of 47,600 homes to deliver between 2019 and 2029. However, in the years preceding the Local Plan housing target, Newham has delivered a shortfall of housing delivery against this target. Between 2019/20 and 2024/25 17,594 units were delivered in the borough, resulting in a shortfall of delivery of 10,966 units against the London Plan target. This has been a result of macro-economic factors such high interest rates and inflation as well as the time it has taken for the industry to adjust to new policy and legislative requirements (for example, around building safety).**

A detailed review of each site allocation in the Local Plan suggests that delivery over the plan period is unlikely to meet the ambitious target set for the borough by the London Plan (2021) plus the borough's historic shortfall by 2028/29. Therefore, to respond to these factors the Local Plan seeks to propose a capacity-based target, via a stepped trajectory to reflect realistic delivery expectations. While the Local Plan housing target is proposed to start from financial year 2027/28 (the year following adoption of the plan), for the avoidance of doubt the London Plan target will continue to apply in the period from the adoption of the Plan until 31 March 2029. Over the longer-term Newham will make up our historic shortfall against the London Plan targets.

Over the course of our plan period Newham will look to enable the delivery of between 51,425 and 53,784 **45,611 and 53,954** additional new homes.

Policy J1 Employment and growth

AP4. Council to amend the proposed modification to policy J1 part 1 [FM08] to delete "over the plan period to" and insert the year from which the requirement relates (for example, "... floorspace between 202X and 2042").

Council Response:

4.1 Please see below the Council proposed modifications to Policy J1 part 1

1. *Developments will be expected to support diverse, inclusive and green economic growth and contribute to meeting the borough's office and industrial needs to deliver ~~10,000~~ 12,800 jobs (~~4,800~~ **6,400** in the office sector and ~~5,200~~ **6,400** in industrial/warehousing and logistics sectors); ~~335,000~~ **418,000** sqm of industrial floorspace and a minimum of ~~90,000~~ **118,000** sqm of office floorspace over the Plan period to 2038* **between 2021 to 2042.**

The detail calculation of the requirements is outlined in the Appendix of our Written Matter 8 (EWS039a).

Policy D4 Tall buildings

AP5. Council to draft a potential modification to policy D4 to:

- a) Delete references to "limits" and "maximum" height ranges and refer to "appropriate" building heights.
- b) Refer to tall buildings being permitted in the tall building zones defined on the policies map having regard to the appropriate building heights set out in Table 1 subject to meeting other relevant policy requirements.
- c) Refer to tall buildings outside the tall building zones defined on the policies map only being permitted if all of the following criteria are met [set relevant locational and other criteria].
- d) Include reference to London Plan policy D3 optimising site capacity through a design-led approach in the list of Policy Links.

Council Response:

5.1 Please see below potential modifications in relation to AP5:

AP5.a AP5.b	D4. 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	D4. 2
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	their role within the local and wider context and should not exceed the respective limits be consistent with the appropriate building heights set in Table 1 below, subject to meeting other relevant policy requirements.	
AP5.a	<ul style="list-style-type: none"> Prevailing heights should generally be between 9m and 21m (ca. 3-7 storeys). Opportunity to include tall building elements of approximately up to 50m (ca. 16 storeys). 	<p>Table 1, Further guidance</p> <p><i>This will apply for consistency to all tall building zones</i></p>
AP5.c	<p>Outside tall building zones, opportunities to increase density without tall buildings should be explored. Tall building developments outside tall building zones will be supported if they meet part 3 and 4 of the policy and if they meet the following criteria:</p> <ul style="list-style-type: none"> - be located in an area with high level of public transport accessibility within town centre and/or opportunity areas; - demonstrate they don't detract from important landmarks and key views set in the adopted conservation area appraisal and management plans; - demonstrate they don't harm the protected vista set out in the London View Management Framework (LVMF), - demonstrate to positively contribute to the legibility of the tall building clusters identified in the tall building zones by aligning with the appropriate height range set in Table 1; - demonstrate they can positively mark the presence of a local or town centre; - demonstrate that taller developments can make an exemplary contribution to the quality of the surrounding public realm and provide meaningful publicly accessible open space 	D4. 2
AP5.a	Height Range Maximum Appropriate heights	Table 1
AP5.d	D3: Optimising site capacity through the design-led approach	Policy links
AP5.a	Designated Tall Buildings Zones are identified in the Policies Map. The Tall Building Zones Map identifies the maximum permissible appropriate heights and where the prevailing height of new developments could be between 9m and 21m and where the prevailing height can exceed 21m, but should generally be below 32m. The varying heights across Tall Building Zones allow for transitioning heights to surrounding context and sensitive areas.	Implementation text D4.2

AP6. Council to draft a modification to policy D4 Table 1 to:

- a) Amend the references to “conserve and enhance” to “conserve or enhance”.
- b) Amend the reference to “avoid overshadowing impacts ...” to “preventing harmful impacts on biodiversity or water quality by avoiding or minimise overshadowing ...” (or similar).
- c) Refer to “having regard to landmarks and key views identified in the relevant conservation area appraisal” (or similar).

Council Response:

- 6.1 Please see below, proposed modifications to Table 1, Further Guidance column in relation to AP6.
- 6.2 These changes will apply for consistency to all TBZs:
- in proximity to water spaces
 - in proximity to conservation areas and heritage assets

AP6.b	Careful consideration is required for suitable the location of tall buildings, particularly along the waterways water spaces , to avoid overshadowing impact on watercourses. to avoid or minimize overshadowing that could negatively affect plant growth and the quality of water spaces.
AP6.c	Tall buildings should conserve the character of the area without harming the significance of heritage assets or detracting from important landmarks and key views, including views set in Stratford St John’s conservation area appraisal and management plan and Sugar House Lane conservation area appraisal and management plan.

- 6.3 In regard to the proposed modification of AP6.a the Council considers that the current wording ‘conserve and enhance’ used in reference to tall buildings in proximity to heritage asset is justified and in line with the London Plan policy HS1 B(4) which states “*delivering positive benefits that conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing*”.
- 6.4 This approach is also in line with the NPPF paragraph 203 a, which talks about ‘*sustaining and enhancing the significance of heritage assets*’.
- 6.5 The Council considers that heritage assets should not only be conserved in its fabric and value but also enhanced as part of the wider place making strategy as outlined in Local Plan policy D9.

Neighbourhoods diagram

AP7. Council to prepare a modified version of the Neighbourhoods diagram to indicate the conserve, enhance and transform areas [as proposed in FM010].

Council Response:

- 7.1 Please see in Appendix 1, a copy of the Neighbourhoods diagram indicating the conserve, enhance and transform areas.

AP8 Council to draft a modification to paragraph 4.3 (and / or other relevant parts of the Plan) to clarify the relationship between the part 1 policies and site allocation policies, and in particular the flexibility there may be in achieving the development and design principles.

Council Response:

8.1 Please see below, proposed modifications to paragraph 4.3

AP8.a	<p>The policies in this chapter set out how each neighbourhood will change up to 204238. The policies provide the vision, design and development principles for each neighbourhood, which will inform and guide development in each neighbourhood. All applications will be assessed against the relevant neighbourhood policy and, where applicable, the site allocation requirements. Site allocation policies will inform and guide development on specific sites. The neighbourhood policies and site allocations are to be read alongside the other policies in the Local Plan which set out the standards and requirements for different uses and factors such as design and transport.</p> <p>Within these neighbourhoods, site allocations have been identified to deliver new homes and jobs alongside necessary infrastructure, such as green space, transport connections and social infrastructure (including community, health, education, sport and informal recreation facilities).</p> <p>Each site allocation includes illustrative diagrams showing how development could be delivered. These diagrams are indicative and demonstrate how the principles and requirements in this section might be implemented. The delivery of these sites will be shaped through co-designed masterplanning in accordance with Policy BFN2. Alternative layouts may be acceptable where clear, robust justification is provided and the approach delivers outcomes consistent with the allocation, and other policies in the Local Plan.</p> <p>When determining an application, flexibility may be applied to the site allocation requirements based on an up-to-date assessment of need and the agreed viability position of the scheme. This approach ensures that the site allocations remain deliverable within the context of sustainable development.</p> <p>The neighbourhood policies and site allocations are strategic policies for the purposes of neighbourhood planning.</p>	Part 2 4.3
AP8.b	<p>Infrastructure requirements</p> <p>Development should address open green space deficiency by providing a consolidated ILocal pPark / Open Space with a minimum area of 2 hectares to service nearby residential neighbourhoods. The open space provision should prioritise community growing opportunities. Green space provision should meet the requirements of Local Plan Policies GWS1 and GWS3.</p> <p><i>N.B. GWS2 will be inserted where applicable.</i></p>	<p>Example Part 2 N8.SA1</p> <p><i>(This to be repeated for all allocations with open space provision)</i></p>

Allocation maps / indicative diagrams

AP9. Council to prepare a potential modification to paragraph 4.3 (and / or other relevant part of the Plan) to explain the purpose and status of the allocation maps (“indicative diagrams” [FM01]).

Council Response:

- 9.1 Please see below, proposed modifications to paragraph 4.3 (and / or other relevant part of the Plan) to explain the purpose and status of the allocation maps indicative diagrams.

AP9	<p>[...]</p> <p>Each site allocation includes illustrative diagrams showing how development could be delivered. These diagrams are indicative and demonstrate how the principles and requirements in this section might be implemented. The delivery of these sites will be shaped through co-designed masterplanning in accordance with Policy BFN2. Alternative layouts may be acceptable where clear, robust justification is provided and the approach delivers outcomes consistent with the allocation, and other policies in the Local Plan.</p> <p>[...]</p>	<p>Part 2 4.3</p> <p><i>As seen above in AP8.a</i></p>
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N17 Gallions Reach and N17.SA1 Beckton Riverside

AP10. Council to prepare a statement of common ground with St William Homes, Aberdeen Investments and TfL to address Q4.2 parts (a), (b) and (c) relating to the DLR extension and the nature and timing of development on the allocation. The SOCG should include potential modifications (and consider whether the deletion of “or similarly transformative public transport intervention such as a new river crossing” is necessary¹), and identify areas of agreement and, if applicable, any outstanding areas of disagreement.

Council Response:

- 10.1 The Council is currently in discussion with all parties in progressing a SoCG. We aim to issue a signed copy week ending 23d January 2025

N2.SA4 Excel Western Entrance

AP11. Council to draft a potential modification to policy N2.SA4 and the allocation map (“indicative diagram”) to ensure that the requirement relating to open space / green space is justified and effective.

Council Response:

- 11.1 Please see proposed modifications below to site allocation N2.SA4.

Development Principle

*Development should retain **the quantity** and enhance **the functionality of** existing open space, **including Royal Victoria Square to create along the waterfront edge.** ~~Royal Victoria~~*

¹ Proposed in the Council's M4 statement in response to Q4.2, but omitted (in error?) from ED6.

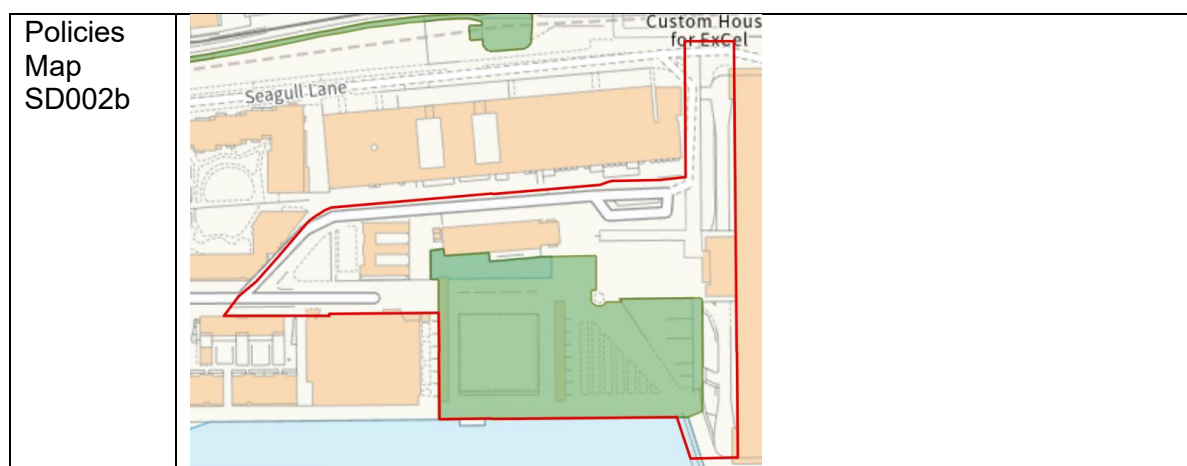
~~Square to be reconfigured at the east of the site creating an inviting entrance to the Excel conference centre site, in accordance with Local Plan GWS1.~~

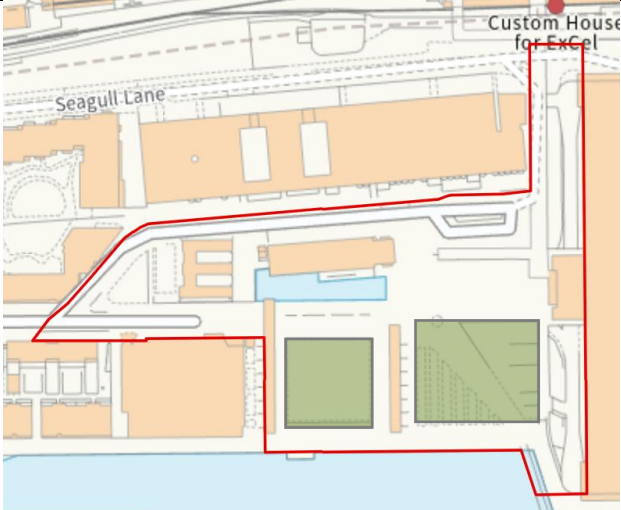
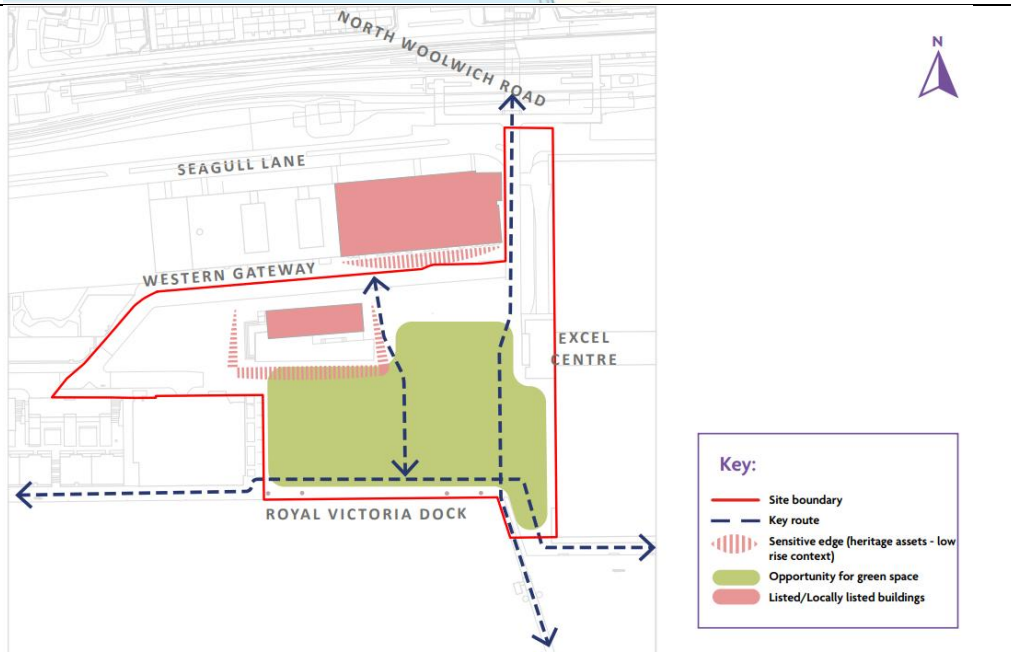
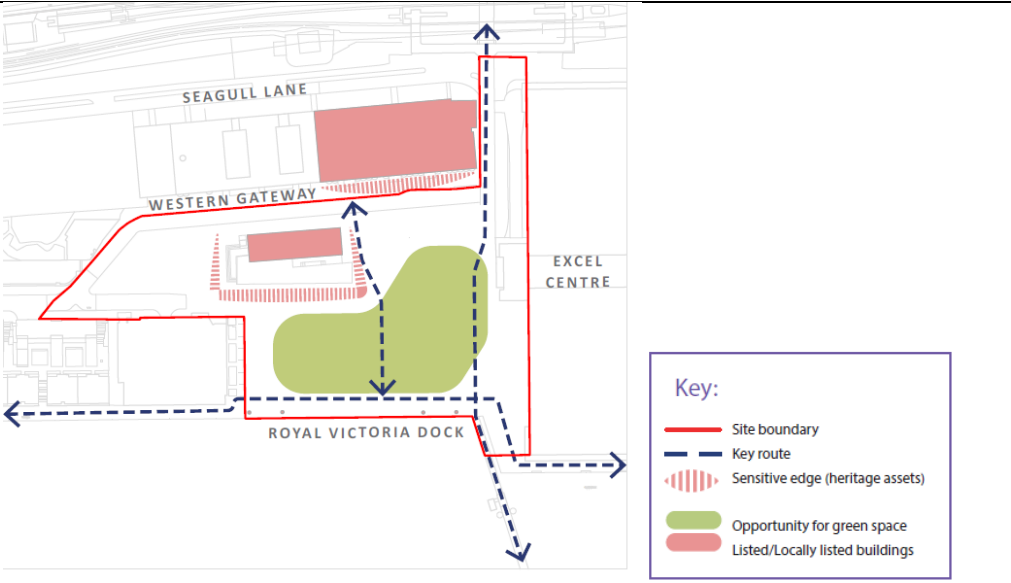
Infrastructure Requirement

Development should ~~protect existing open space and~~ address ~~open~~ **green** space deficiency by re-providing and enhancing **existing green space, including the Royal Victoria Square, Civic Space** as a consolidated **and flexible small** open space. **The consolidated green space should retain the existing quantity of green space, while enhancing its functionality and exploring the opportunity for retaining original design features of heritage value.** The ~~open~~ **green** space should prioritise community growing opportunities.

In addition to the ~~open~~ **green** space provision, development should provide publicly accessible play space in the form of a Locally Equipped Area for Play as well as play space in the form of a Local Area for Play, which should be playable public realm. Play space should meet the requirements of Local Plan Policy GWS5.

- 11.2 The Council also proposes a modification to the policy map to correct error in the green space designation on this site. The green space boundary will be reduced to reflect the area falling within green space definition in the Green and Water Infrastructure Strategy (EB061). This change will operate alongside the proposed modification to the policy wording, which requires developments to retain the quantity of existing green space according to the modified boundary.
- 11.3 The Council also proposes a modification to the site allocation map to reflect a smaller area of opportunity for green space and the map will be indicative only.



<p>Proposed modified Policies Map</p>	
<p>Site allocation map in SD002b</p>	 <p>Key:</p> <ul style="list-style-type: none"> Site boundary Key route Sensitive edge (heritage assets - low rise context) Opportunity for green space Listed/Locally listed buildings
<p>Proposed modified site allocation map</p>	 <p>Key:</p> <ul style="list-style-type: none"> Site boundary Key route Sensitive edge (heritage assets) Opportunity for green space Listed/Locally listed buildings

Queen's Market

AP12. The justification for the inclusion of Queen's Market as TBZ2 in policy D4 Table 1 (and its identification as a transform area in the Characterisation Study) will be considered further under Q4.16 on Thursday 11 December 2025 in the context of policy N14 Green Street.

Council Response:

- 12.1 A more detailed response will be provided in **IN7: Action Points from Week 2 Hearing Sessions**, where the Council will set out the proposed modifications arising from the hearing discussions.