

# **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.

### Tall building spatial strategy and hierarchy

**AP13.** Council to prepare potential modification(s) to the Plan to set out the tall building strategy and spatial hierarchy, based on the existing evidence and analysis in the Tall Buildings Annex.

#### Council Response:

1.1 The following modifications are proposed to BFN1:

2. Development will make the best use of land, optimise sites and deliver sustainable development by:
  - a. applying a design-led approach which responds to the site's surrounding character and context; and
  - b. supporting tall buildings in the borough's Tall Building Zones **to ensure the delivery of the borough-wide spatial hierarchy set out in policy D4;** and
  - c. conserving and enhancing the borough's heritage assets and settings; and
  - d. delivering zero carbon, climate resilient and nature-friendly developments.

1.2 See below the potential modification to policy D4.2

D4. 2 Tall buildings will only be acceptable, subject to detailed design and masterplanning considerations, in areas designated as 'Tall Building Zones'. **To ensure that tall buildings contribute positively to a coherent townscape and skyline which sensitively integrate with the context, the heights of tall building developments should be consistent with the appropriate heights set in Table 1 below, subject to meeting other relevant policy requirements.** 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 reflect the borough-wide spatial hierarchy. This will be achieved through:~~

- a) **Consolidating the tallest clusters of tall buildings in TBZ13: Canning Town, TBZ15: West Ham Station and TBZ19: Stratford Central, which have been identified as the areas of greater opportunity for growth due to their emerging context, district or local centre designation within Opportunity Areas (OAs) with high level of accessibility;**
- b) **ensuring a sensitive transition from the highest clusters to the lower and/or sensitive context while supporting the densification of larger areas within OAs with high level of accessibility in TBZ18: Stratford High Street, TBZ13: Canning Town, TBZ15: West Ham Station and TBZ20: Chobham Manor/East Village;**
- c) **supporting the densification of OAs with a lower accessibility to public transport in TBZ5: Gallions Reach, TBZ10: North Woolwich Road and TBZ11: Lyle Park;**
- d) **managing height transition in OAs constrained by airport proximity and sensitive context - whether low rise context or an historic asset - in**

**TBZ6: Albert Island, TBZ7: King George V/Pier Parade, TBZ8: Store Road, TBZ9: Royal Albert North, TBZ14: Manor Road, TBZ16: Abbey Mills, TBZ21: Excel West;**

- e) marking key locations with tall elements within local or town centre designations with high accessibility to public transport in TBZ1: Forest Gate, TBZ2: Green Street, TBZ3: East Ham, TBZ4: Beckton, TBZ12: Custom House, TBZ17: Plaistow Station;
- f) supporting industrial intensification in S1Ls within TBZ4: Beckton, TBZ5: Gallions Reach and TBZ22: Thameside West.

**5. Outside tall building zones, opportunities to increase density without tall buildings should be explored. Proposals for tall buildings outside tall building zones will be supported if they meet part 3 and 4 of the policy and if the meet the following criteria:**

- a. be located in an area with high level of public transport accessibility within town centre and/or opportunity areas;
- b. demonstrate they don't detract from important landmarks and key views set in the adopted conservation area appraisal and management plans;
- c. demonstrate they don't harm the protected vista set out in the London View Management Framework (LVMF),
- d. 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;
- e. demonstrate they can positively mark the presence of a local or town centre;
- f. demonstrate that taller developments can make an exemplary contribution to the quality of the surrounding public realm and provide meaningful publicly accessible open space

1.3 See below the potential modification to policy D4, justification text:

3.52 The location, scale and suggested height of each Tall Building Zone reflects the findings of the Newham Characterisation Study (2024) and the Tall Building Annex (2024). **The 22 tall building zones cover significant areas of transformation within the three opportunity areas (OAs) and include the The majority of the site allocations are included in the Tall Building Zones reflecting their status as 'transform' areas of the borough across the different parts of the borough and considers the importance of Town and Local Centres as hearts of their neighbourhoods**

Tall Building Zones reflect an assessment exercise undertaken to identify suitable locations for tall buildings. This was informed by a townscape sensitivity screening assessment and suitability scoping exercise. **Suitable locations have been identified based on an assessment of existing and emerging heights, proximity to public transport, impact on open space and heritage assets. The opportunity for growth and the constraints identified through the assessment have informed the tall building spatial hierarchy, which establishes different roles for different parts of the borough and considers the importance of Town and Local Centres as hearts of their neighbourhoods. The majority of the site allocations are included in the Tall Building Zones reflecting their status as 'transform' areas of the borough.**

**Areas within OAs, within Metropolitan and District Centre, with the highest level of public transport accessibility and with emerging clusters of tall buildings, have been identified as the area of maximum capacity in the Borough. The other Tall Building Zones are identified as subservient to the three key location in Stratford, Canning Town and West Ham. Other tall building locations are considered suitable**

**to support densification with tall building forms that are in keep with the context and that are mindful of lower public transport accessibility, the proximity to heritage assets, low-rise context and the airport. The tall building strategy supports industrial intensification in all Strategic Industrial Locations (SILs) and support the densification of key locations with high public transport accessibility in proximity to stations and within a town centre boundary.**

1.4 See below potential modification to the implementation text:

**D4.2 The Tall Building Annex (2024) provides in more detail the borough tall building spatial hierarchy that should be address when delivering tall buildings.** Site allocations provide additional design guidance with respect to relevant Tall Building Zones. The Newham Characterisation Study (2024) borough-wide design guidance includes tall building design considerations more generally, which should also be addressed.

Development of tall buildings outside of the Tall Building Zones will be **generally** considered a departure from the plan, **unless they meet the criteria for tall buildings outside Tall Building Zones identified in policy D4.2.**

### **Tall building zone boundaries and heights**

**AP14.** Council to consider whether there is evidence in the examination library, including that relating to emerging character / evolving context, that indicates that the tall building zone boundaries defined on the policies map or the heights referred to in policy D4 Table 1 need to be modified in order to be justified and effective.

#### **Council Response:**

2.1 The Council considers the methodology used to identify suitable locations and heights for tall buildings and the aspiration of ensuring a consistent skyline in the Borough to be well evidenced and justified in the Tall Building Annex [EB023]. However, a few exceptional circumstances have been highlighted during the examination which might require a review of the boundary or of the 'appropriate height' for some of the tall building zones to ensure its effectiveness.

2.2 The Council has reviewed the evidence presented in the examination library and considered some changes which are explained in more detail below.

- **TBZ11: Lyle Park**
  - **N2.SA2 Lyle Park West** – The emerging context to the east of Lyle Park, which includes Royal Wharf and Deanston Wharf, has been captured in the Fig. 3 of the Tall Building Annex [EB023]. The map shows the 'height of tall elements integrated within the blocks' to be up to 40m (ca. 13 storeys) and a few 'buildings substantially taller than the context' to be 51-60m (ca. 17-21 storeys). The Council considers that the 40m height is in keep with the prevailing height of the emerging context. However, considering L&Q site, which has been implemented in planning terms, has been approved with greater height, we support the propose to amend the appropriate height with

60m. The proposed modification to change 'maximum' height parameters with 'appropriate' heights will help managing the granularity of the application.

Tall Building Zone	Neighbour hood	Site allocation(s)	Appropriate Heights Height Range Maximum	Further guidance
TBZ11: Lyle Park West	N2 Royal Victoria	N2.SA2 Lyle Park West	40m 60m (ca. 13-20 storeys)	<ul style="list-style-type: none"> <li>• Prevailing heights should <b>generally</b> be between 21m and 32m (ca. 7-10 storeys).</li> <li>• Opportunity to include tall building elements <b>of approximatively up to 40m 60m (ca. 13-20 storeys)</b> in proximity to the riverside and to mark the new Neighbourhood Parade at West Silvertown DLR.</li> <li>• <b>Subject to airport constraints.</b></li> <li>• Development should be mindful of height transitions when delivering higher densities.</li> <li>• <b>Careful consideration is required for suitable location of tall buildings, particularly along the water spaces, to avoid or minimize overshadowing that could negatively affect plant growth and the quality of water spaces.</b></li> </ul>

- **TBZ13: Canning Town**

- **N4.SA4 Limmo** - As highlighted in the Tall Building Annex (2024), the aspiration of the Borough was for emerging tall buildings in Canning Town to be lower than the maximum established height of Brunel Works development to avoid the saturation of the skyline and the negative environmental effect (noise and wind tunnel) of tall buildings, which have already been reported by residents [see Reg. 18. E005-003 in the SD046]. While this remains our preferred option, we acknowledge that further buildings around 100m have been built and approved in Canning Town. Therefore, due to the evolving context and the constraints of the site, the Council supports the proposed modification to designate the site with a 100m zone, subject to airport height constraints.

- **N4.SA5 Canning Town Riverside** – An application for the site [23/00655/FUL] has been approved in 2023 with another tall building around 100m, consolidating a cluster of tall buildings in Canning Town. The Council is proposing to add a 100 m zone to reflect the permission. This change will be reflected in the policies map.
- **N2.SA4 Thameside West** – The Council acknowledges that the status of the approved hybrid application [18/03557/OUT] has changed since the tall buildings assessment. Based on the latest start and completion data (2024) the site is currently under construction, providing more certainty on the deliverability of the site and establishing an evolving context above the 50m height proposed in the Local Plan. Therefore, the Council considers that the height of the TBZ13: Canning Town within the N2.SA4 site allocation should reflect the heights of the approved scheme and that zones of 60m and 100m should be added to the policy map, in the relevant areas of the site. The proposed modification to change 'maximum' height parameters with 'appropriate' heights will help managing the granularity of the proposed heights in the outline application.

Tall Building Zone	Neighbourhood	Site allocation(s)	Appropriate Heights Height Range Maximum	Further guidance
TBZ13: Canning Town	N4 Canning Town and N2 Royal Victoria	N4.SA1 Canning Town East N4.SA2 Silvertown Way East  N4.SA3 Canning Town Holiday Inn  N4.SA4 Limmo  N4.SA5 Canning Town Riverside  N2.SA4 Thameside West	50m (ca. 16 storeys) and 40m (ca. 13 storeys), 60m (ca. 20 storeys) and 100m (ca. 33 storeys) in the defined areas	<ul style="list-style-type: none"> <li>• Prevailing heights should <b>generally</b> be between 21m and 32m (ca. 7-10 storeys).</li> <li>• In the north east of the Tall Building Zone, a limited number of tall building elements <b>of approximately up to</b> 40m (ca. 13 storeys) could be delivered subject to careful transition to the lower rise residential development to the east.</li> <li>• To mark Canning Town station and district centre, tall buildings, <b>with elements of approximately up to</b> 100m (ca. 33 storeys) are suitable <b>in the defined areas</b>. It is considered that the existing cluster should be the highest point and all new tall elements should <b>step down from this central cluster</b>.</li> <li>• <b>This step down should be marked at N5.SA4 Limmo and N5.SA5 Canning Town Riverside</b></li> </ul>

				<p>where there are limited opportunities for tall building elements up to 60m (ca. 20 storeys).</p> <ul style="list-style-type: none"> <li>• In the rest of the Tall Building Zone, including to mark the new DLR station and local centre at Thameside West, limited additional tall buildings with elements of <b>approximatively up to 100m 50m</b> (ca. 16 storeys), could be integrated carefully to aid wayfinding and mark special locations.</li> <li>• Development including tall buildings in this zone should assess their visual and townscape impact in the context of existing and permitted tall buildings to ensure the cumulative impact does not saturate the skyline.</li> <li>• Development should be mindful of height transitions and visual impact when delivering industrial intensification through stacked industrial typology.</li> </ul>
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- **TBZ16: Abbey Mills**

- **N7.SA1 Abbey Mills** – Considering the emerging context in the N7.SA2 Twelvetrees Park and Former Bromley By Bow Gasworks within the TBZ15: West Ham Station, and the high level of public transport accessibility of the site, the Council supports the proposed modification to add a 100m zone and to amend the boundary line of TBZ16: Abbey Mills to include the site in its entirety to ensure the optimisation of the site. However, the Council considers that a sensitive height transition towards the Abbey Mills Conservation Area is still necessary to reduce the cumulative impact of tall buildings on the historic assets. Therefore, the policy has been amended to reflect this aspiration.

Tall Building Zone	Neighbourhood	Site allocation(s)	<b>Appropriate Heights Height Range Maximum</b>	Further guidance
TBZ16: Abbey Mills	N7 Three Mills	N7.SA1 Abbey Mills	40m (ca. 13 storeys)	<ul style="list-style-type: none"> <li>• Prevailing heights should <b>generally</b> be</li> </ul>

			<p><b>100m (ca. 30 storeys)</b></p> <ul style="list-style-type: none"> <li>• between 21m and 32m (ca. 7-10 storeys).</li> <li>• Opportunity to include tall building elements of <b>approximately up to 40m (ca. 13 storeys) and 100m (ca. 30 storeys)</b> towards the station and subject to careful transition to the <b>Abbey Mills Conservation Area</b></li> <li>• Height, scale and massing of development proposals should be assessed to conserve <b>or and</b> enhance the character of heritage assets without detracting from important landmarks and key views, including the Abbey Mills Pumping Station.</li> <li>• Careful consideration is required for <b>suitable</b> the location of tall buildings, particularly along the water <b>spaces, ways to avoid overshadowing impact on watercourses to avoid or minimize overshadowing that could negatively affect plant growth and the quality of water spaces.</b></li> <li>• <b>Development should be mindful of height transitions when delivering higher densities.</b></li> </ul>
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- **TBZ18: Stratford High Street-** As explained in the Tall Building Annex [EB023] p. 62 'Tall building spatial hierarchy', the TBZ18 has been identified as suitable for managing the height transition from the tallest cluster of tall buildings in the TBZ19: Stratford Central to the medium rise context of the rest of N8 area. The objective of applying a 50m height parameters has also been identified to create a more coherent skyline along Stratford High Street and avoid the scattered composition of tall buildings. However, further tall building developments have been recently approved with greater heights on the High Street: 302-312 Stratford High Street [25/01687/FUL] and 68-70 High Street [24/01905/FUL]. A few changes might be required to reflect the evolving context of approved schemes and make the policy more effective. The proposed modification to change 'maximum' height parameters with 'appropriate' heights will help managing future variations of schemes that have not been approved yet or are still at pre-application stage.
  - **N7.SA3 Sugar House Island** – The Council considers that the proposed 32m (ca. 10 storeys) zone is consistent with the approved parameters plan on the remaining plot Mu3, which range from 2-9 storeys, therefore justified. However, the Council considers that the site can be designated in its entirety as 50m zone with prevailing height between 21m and 32m (ca. 7-10 storeys) which still aligns with the borough-wide spatial hierarchy. The 50m appropriate height should still ensure that plot Mu3 can be delivered in keep with the emerging character of Sugar House Island, of which is a key component, to complete the vision of preserve the industrial character, scale and grain of buildings, yards and streets that have been recognised of note in the Sugar House Conservation Area Appraisal and Management Plan.
  - **302-312 Stratford High Street** – This site falls within a 40m zone. However, the site has been recently granted permission with a 31 storeys building. Therefore, the Council considers more effective to add a 100m zone on this site and reduce the 40m zone to the north of the railway. This change will be reflected in the policies map.
  - **N8.SA4 Stratford Bingo Hall** – The council acknowledges that a scheme at 302-312 Stratford High Street, has been recently granted permission with a 31 storeys building. The proposed changed explained in the paragraph above requires a further amendment to N8.SA4 Stratford Bingo Hall. To ensure a gradual transition from proposed 100m area on 302-312 Stratford High Street to the medium rise context to the east, a 50m zone is considered more appropriate on the N8.SA4 Stratford Bingo Hall site. As consequence the 32m zone will be split into two zones and removed from the N8.SA4 site. The area at the north of Bingo Hall site and adjacent the conservation area will remain 32m. The area at the south of the N8.SA4 site will be more suitable as 40m which is more in line with some of the existing and approved schemes. Those changes will be reflected in the policies map.
  - **N8.SA7 Rick Roberts Way** – The Council considers that a 60m zone can be appropriate along the High Street to mediate between the established taller buildings (Halo Tower and River Heights) and the lower context. This change will be reflected in the policies map.
  - **N8.SA8 Bridgewater Road** – The Council considers that a 60m zone can be appropriate to aid wayfinding on the site. This change will be reflected in the policies map.

- **N8.SA9 Pudding Mill** – The Council acknowledges that a new permission [21/00574/OUT] has been granted in 2023 with a tall element up to 95m since the tall buildings assessment. Therefore, the Council considers that a 60m and 100m defined areas should be added to the tall building zone policy map, in the relevant areas of the site to reflect the outline permission. This modification will still align with the borough-wide spatial strategy, as the tallest elements will act as markers of the Pudding Mill Lane DLR station. Those changes will be reflected in the policies map.

Tall Building Zone	Neighbour hood	Site allocation(s)	Appropriate Heights Height Range Maximum	Further guidance
TBZ18: Stratford High Street	N7 Three Mills and N8 Stratford and Maryland	N7.SA3 Sugar House Island  N8.SA3 Greater Carpenters District  N8.SA4 Stratford High Street Bingo Hall  N8.SA7 Rick Roberts Way  N8.SA8 Bridgewater Road  N8.SA9 Pudding Mill	50m (ca. 16 storeys) and 100m (ca. 33 storeys), 60m (ca. 20 storeys), 40m (ca. 13 storeys) and 32m (ca. 10 storeys) in the defined areas.	<ul style="list-style-type: none"> <li>• Prevailing heights should <b>generally</b> be between 21m and 32m (ca. 7-10 storeys), except at the sensitive edges of the tall building zone, where prevailing heights should <b>generally</b> be between 9m and 21m (ca. 3-7 storeys).</li> <li>• Opportunity to include limited tall building elements of <b>approximately up to</b> 50m (ca. 16 storeys) and 100m (ca. 33 storeys), 60m (ca. 20 storeys), 40m (ca. 13 storeys) and 32m (ca. 10 storeys) in the defined areas.</li> <li>• Tall elements in the 32m area and/or in close proximity to the conservation areas should be limited in number.</li> <li>• Tall buildings in immediate proximity to the conservation area and other designated heritage assets should address and respond to their scale, grain and significance as well as the wider streetscape and local character.</li> <li>• Tall buildings should conserve the character of the area without harming the significance of heritage assets or detracting from important landmarks and key views <b>including views</b></li> </ul>

				<p>set in Stratford St John's conservation area appraisal and management plan and Sugar House Lane conservation area appraisal and management plan.</p> <ul style="list-style-type: none"> <li>• Development including tall buildings in this zone should assess their visual and townscape impact in the context of existing and permitted tall buildings to ensure the cumulative impact does not saturate the skyline.</li> <li>• Careful consideration is required for <b>suitable</b> the location of tall buildings, particularly south of the water <b>spaces</b>, ways to avoid overshadowing impact on watercourses to <b>avoid or minimize</b> overshadowing that could negatively affect plant growth and the quality of water spaces.</li> </ul>
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- **TBZ19: Stratford Central-** As highlighted in the Tall Building Annex (2024), the aspiration of the Borough was for emerging tall buildings in Stratford to be lower than the maximum established height to avoid the saturation of the skyline. The tall building methodology, based on the assessment of the existing context, includes different heights (32m-40m-50m-60m-100m) and the TBZ19 Stratford Central has been identified as the zone with the maximum height capacity (60m and 100m). However, there are some developments within the zone that have been approved with maximum height around 70m, 80m and above 100m. The Council acknowledges that these developments can still benefit from those consensuses and/or from the Stratford City Outline Planning Permission. Therefore, the Council considers that that the proposed modification to change 'maximum' height parameters with 'appropriate' heights will help managing these height gaps and that further modifications are not necessary. However, following a further review the Council propose a change to extend the 60m zone boundary line to include Plot 16 of Get Living Place in its entirety, to ensure boundary accuracy.

## N7.SA1 Abbey Mills

**AP15.** Council to prepare a potential modification to policy N7.SA1 (and site map / indicative diagram) to:

- a) Delete the reference to “equivalent amount of community floorspace” and ensure the policy is effective in allowing sufficient floorspace to meet future needs, including for a place of worship.
- b) Consider whether the shape of the “opportunity for local centre” on the site map / indicative diagram would be effective in allowing an appropriate form of development including a place of worship and other community facilities.
- c) Clarify how routes to and from the site could improve access and connectivity to West Ham Station and allocation N7.SA2 including the proposed Twelvetrees local centre.
- d) Consider whether the shapes / locations of the “opportunity for green space” shown on the site map / indicative diagram are justified and effective.
- e) Ensure that the building heights referred to in policy N7.SA1 are consistent with those referred to in TBZ16 (subject, if relevant, to AP14).

### Council Response:

3.1 a) Please see proposed modifications below to site allocation N7.SA1.

#### Development principles

Development should replace the existing temporary community use ~~with the equivalent amount of community floorspace~~, meeting the requirements of Local Plan Policy SI1. Development should address the need for community facilities in the area by delivering new community facilities in Twelvetrees Local Centre, 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.

#### Design principles

~~The community facilities should be located to the south east of the site in proximity to West Ham Station and as part of Twelvetrees Local Centre.~~

3.2 b) The Council considers that the shape of the “opportunity for local centre” on the site map / indicative diagram would be effective in allowing an appropriate form of development including a place of worship and other community facilities. The boundary on the Abbey Mills site map / indicative diagram was designed around the community infrastructure requirements, recognising these should be in the most accessible locations and preferably within a centre as per policy SI2. The boundary is flexible as per policy HS1.3, with masterplanning processes allowing flexibility on the actual boundary extent as long as the design criteria of the policy can be met.

3.3 c) Design principles

The design and layout of the site should establish a connected network of streets that connects to the wider street network and should create street hierarchy. Routes through and to and from the site should improve access and connectivity to the Greenway, ~~West Ham Station~~, N7.SA2 Twelvetrees Park and Former Bromley By

Bow Gasworks and the Twelvetrees Local Centre. **Routes to and from the site should improve access and connectivity to West Ham Station.**

The layout of the site, including the provision of a local park and additional green infrastructure, should enable the continuation of the Leaway Walk through the site to connect the Lea Walk to the Greenway at the head of Abbey Creek.

**Infrastructure requirements**

Development should provide an improved bridge connection to West Ham Station.

[...]

3.4 d) The Council considers the site allocation maps / indicative diagrams are justified and effective due to the proposed modification to paragraph 4.3 to explain the purpose and status of the site allocation maps / indicative diagrams. Please see below the proposed modification.

[...]

**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.**

[...]

**3.5 e) Design principles**

Building heights should be generally range between 9—21 - 32m (ca. 3-7-10 storeys) with taller buildings of approximately up to 40m (ca. 13 storeys) and 100m (ca. 30 storeys) towards the station to aid wayfinding.-Massing should step down towards the west of the site to sensitively integrate with the heritage assets. Buildings should be set back from the watercourse spaces to avoid or minimise overshadowing impact.

## N8.SA7 Rick Roberts Way

**AP16.** Council to prepare a potential modification to policy N8.SA7 to clarify the requirements relating to open space, sport and recreation

### Council Response:

4.1 Please see proposed modifications below to site allocation N8.SA7.

#### Development principles

[...]

~~Development should protect and enhance existing sports and recreation uses in accordance with Local Plan Policies SI1 and SI3.~~

~~The 1.2 hectares of open space should be provided on the publicly owned land.~~

[...]

#### Infrastructure requirements

Development should address existing ~~open green~~ space deficiencies by providing a small ~~open green~~ space with a minimum of 1.2 hectares ~~on the publicly owned land~~. **Green space provision should meet the requirements of Local Plan Policies GWS1 and GWS3.** In addition to the ~~open green~~ space, development should provide publicly accessible play space in the form of a Locally Equipped Area for Play and a Local Area for Play, which should be playable public realm. Development should provide a sports-lit Multi-Use Games Area, ~~on the publicly owned land~~, unless delivered at N8.SA5 Stratford Town Centre West. Play space should meet the requirements of Local Plan Policy GWS5.

Development should meet the need for school places by providing a Special Educational Needs and Disability school on the publicly owned land in accordance with Local Plan Policy SI4.

Development should deliver sports hall provision. Provision should meet the needs identified in the Built Leisure Needs Assessment (2024) and be delivered in accordance with the requirements of Local Plan Policies SI2 and SI3.

## N8.SA9 Pudding Mill

**AP17.** Council to consider whether the requirement in policy N8.SA9 for development to “provide the same quantity of business and industrial floorspace as the permitted schemes” is justified, particularly bearing in mind the preceding requirements relating to the provision of industrial floorspace .

### Council Response:

5.1 This requirement is applicable to four site allocations including N8.SA9, N7.SA2, N7.SA3 and N2.SA4. The requirement is intended to prevent piecemeal loss of industrial capacity as sites come forward for redevelopment, particularly in contexts where demolition or clearance has occurred under permitted development or initial phases of an application's implementation and the permitted quantity will be the only benchmark for employment floorspace. This is crucial to ensure future developments

meeting the significant industrial needs identified in the Employment Land Review 2022. However, to ensure the policy is flexible to accommodate market change, we propose the following modifications to the site allocations:

#### N8.SA9 - Development principles

Development should provide, **as a minimum**, the same quantity of business and industrial **employment** floorspace as the permitted schemes. **Any proposed reduction in this quantity must follow an approach consistent with Local Plan Policy J3 in terms of protecting employment capacity.**

#### N7.SA2 – Development principles

Development on the remainder of the site should deliver, **as a minimum**, the same quantity of employment floorspace as the permitted scheme. **Any proposed reduction in this quantity must follow an approach consistent with Local Plan Policy J3 in terms of protecting employment capacity.**

#### N7.SA3 – Development principles

The other development plots should deliver, **as a minimum**, the same quantity of employment uses as the permitted scheme. **Any proposed reduction in this quantity must follow an approach consistent with Local Plan Policy J3 in terms of protecting employment capacity.**

#### N2.SA4 – Development principles

Development on the site should deliver, **as a minimum**, the same quantity of industrial floorspace as the permitted schemes. **Any proposed reduction in this quantity must follow an approach consistent with Local Plan Policy J3 in terms of protecting employment capacity.**

### **N13.SA3 Former East Ham Gasworks**

**AP18.** Council to prepare a statement of common ground with St William Homes and the GLA that includes a potential modification to policy N13.SA3, and if necessary changes to the MOL boundary on the submitted policies map, that would allow a form of development which has a reasonable prospect of being viable during the plan period.

#### **Council Response:**

6.1 The Council is currently in discussion with all parties progressing a SoCG. We aim to issue a signed copy week ending 30th January 2025.

## Policy N14 Green Street part 4 Queen's Market

**AP19.** Council to draft a potential modification to policy N14 to ensure that it is clear and therefore effective with regard to the role / characteristics of Queen's Market that it is aiming to protect and enhance.

### **Council Response:**

7.1 Please see proposed modifications below to chapter N14 Green Street, including Neighbourhood Profile, Vision and Policy N14. The London Plan Policy E9 Part B3 asks boroughs to set out policies and site allocations to secure an appropriate mix of shops and other commercial units of different sizes, informed by local evidence and town centre strategies, and supports the provision of affordable units where supported by local evidence. Local available evidence include the Newham High Streets Green Street Strategy (2021), Markets 4 People, Queen's Market: a successful and specialised market serving diverse communities in Newham and beyond (EWS003b) and GLA, Street Markets Toolkit: evidencing And Capturing social Value. The Council notes that the modification relies on proposed modifications already proposed to Policies BFN3 and HS4 that introduce the requirement to undertake a Social Value - Health Impact Assessment when development is impacting on a permanent market. More information on the process is included in the SV-HIA Checklist Tool (EB007, Social theme, pg. 5-6).

#### Neighbourhood Profile

4.65 Green Street District Centre is at the heart of the neighbourhood. The district centre provides a specialised, local **South-Asian clothing and jewellery** retail offer with a regional draw. Within this, and Queen's Market is a successful historic market which provides a distinctive and cultural mix of **affordable** foods, textiles, clothing and other products **and services** catering to the needs of the local community as well as those who travel to visit the market, driving footfall and spend in the wider Green Street town centre.

#### Vision

Green Street will continue to be a unique and vibrant neighbourhood. Green Street District Centre will have high quality public realm and will continue to provide independent and specialised shopping while increasing its leisure offer to support a growing evening economy. Queen's Market will be retained and improved as a specialised low-cost food and goods market, and its retail offer will be supported by workspace and community facilities, including a new health centre.

#### Policy N14

[...]

4. protecting and enhancing the role of Queen's Market as an affordable, culturally significant, diverse, covered market by:

- a. requiring development impacting the market to demonstrate how it protects and contributes to the social and economic value of the market, in accordance with Policies BFN3 and HS4;
- a. b. requiring improvements to the public realm, toilets and market facilities;

- b. c. supporting the provision of ~~improved public spaces to support~~ cultural and pop-up activities during the day and into the evening and night-time;
- c. d. supporting a range of uses including retail, employment uses, community facilities and a childcare facility;
- d. e. exploring opportunities for **delivering** additional housing in **line with Policy HS2.5**, ~~accordance with the~~ Green Street Tall Building Zone and Local Plan policy D4, whilst **safeguarding the visibility and character of the market**. ~~managing the transition to the surrounding low rise context~~; and
- e. f. supporting the conversion of 412 – 416 and 420 Green Street to provide a cultural and wellbeing community space;

## **Overshadowing impacts**

**AP20.** Council to consider whether other policy requirements in the Plan relating to “overshadowing” (eg policy N8.SA8 relating to overshadowing allotments”) also need to be modified to be justified and effective.

### **Council Response:**

8.1 Please see proposed modifications below to site allocations N1.SA, N2.SA1, N2.SA2, N2.SA3, N2.SA4, N2.SA5, N3.SA1, N4.SA4, N4.SA5, N7.SA1, N7.SA2, N7.SA3, N8.SA5, N8.SA6, N8.SA8, N8.SA9, N17.SA1

#### **N1.SA1 North Woolwich Gateway**

##### **Design principles**

[...]

**Buildings should be set back from the water spaces to avoid or minimise overshadowing impact.**

#### **N2.SA1 Silvertown Quays**

##### **Design principles**

[...]

**Buildings should be set back from the water spaces to avoid or minimise overshadowing impact.**

#### **N2.SA2 Lyle Park West**

##### **Design principles**

[...]

Buildings should be set back from the ~~watercourse~~ spaces to avoid or minimise overshadowing impact.

## **N2.SA3 Connaught Riverside**

### Design principles

[...]

**Buildings should be set back from the watercourse spaces to avoid or minimise overshadowing impact.**

## **N2.SA4 Thameside West**

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

### Design principles

[...]

**Buildings should be set back from the watercourse spaces to avoid or minimise overshadowing impact.**

## **N2.SA5 Excel Western Entrance**

### Design principles

[...]

**Buildings should be set back from the water spaces to avoid or minimise overshadowing impact.**

## **N3.SA1 Royal Albert North**

### Design principles

[...]

**Buildings should be set back from the water spaces to avoid or minimise overshadowing impact.**

## **N4.SA4 Limmo**

### Design principles

[...]

**Buildings should be set back from the water spaces to avoid or minimise overshadowing impact.**

## **N4.SA5 Canning Town Riverside**

### Design principles

[...]

**Buildings should be set back from the water spaces to avoid or minimise overshadowing impact.**

#### **N7.SA1 Abbey Mills**

##### *Design principles*

[...]

Buildings should be set back from the watercourse **spaces** to avoid **or minimise** overshadowing impact.

#### **N7.SA2 Twelvetrees Park and Former Bromley By Gasworks**

##### *Design principles*

[...]

Buildings should be set back from the watercourse **spaces** to avoid **or minimise** overshadowing impact.

#### **N7.SA3 Sugar House Island**

##### *Design principles*

[...]

Buildings should be set back from the watercourse **spaces** to avoid **or minimise** overshadowing impact.

#### **N8.SA5 Stratford Town Centre West**

##### *Design principles*

[...]

**Buildings should be set back from the water spaces to avoid or minimise overshadowing impact.**

#### **N8.SA6 Stratford Waterfront South**

##### *Design principles*

[...]

**Buildings should be set back from the water spaces to avoid or minimise overshadowing impact.**

## N8.SA8 Bridgewater Road

### Design principles

[...]

Massing should step down towards be sensitively designed to prevent overshadowing the allotments in the north of the site to sensitively integrate with the low-rise context and prevent overshadowing to protect their functionality. Buildings should be set back from the water spaces to avoid or minimise overshadowing impact.

## N8.SA9 Pudding Mill

### Design principles

[...]

Buildings should be set back from the water spaces to avoid or minimise overshadowing impact.

## N17.SA1 Beckton Riverside

### Design principles

[...]

Buildings should be set back from the watercourse spaces to avoid or minimise overshadowing impact.

## Automated vacuum waste collection system

**AP21.** Council to consider whether the requirements in relevant site allocation policies relating to the delivery of an automated vacuum waste collection system need to be qualified (for example, with reference to “where practicable and viable”).

### Council Response:

9.1 Please see proposed modifications below to site allocations N2.SA1, N2.SA3, N2.SA4, N7.SA2, N17.SA1

## N2.SA1 Silvertown Quays

### Infrastructure requirements

Development should deliver an automated vacuum waste collection system to service all Local Authority Collected Waste generated by the development **where viable**, in accordance with the requirements of Local Plan Policy W3.8.

## N2.SA3 Connaught Riverside

### Infrastructure requirements

Development should deliver an automated vacuum waste collection system to service all Local Authority Collected Waste generated by the development **where viable**, in accordance with the requirements of Local Plan Policy W3.8.

#### **N2.SA4 Thameside West**

##### Infrastructure requirements

Development should deliver an automated vacuum waste collection system to service all Local Authority Collected Waste generated by the development **where viable**, in accordance with the requirements of Local Plan Policy W3.8.

#### **N7.SA2 Twelvetrees Park and Former Bromley By Bow Gasworks**

##### Infrastructure requirements

Development should deliver an automated vacuum waste collection system to service all Local Authority Collected Waste generated by the development **where viable**, in accordance with the requirements of Local Plan Policy W3.8.

#### **N17.SA1 Beckton Riverside**

##### Infrastructure requirements

Development should deliver an automated vacuum waste collection system to service all Local Authority Collected Waste generated by the development **where viable**, in accordance with the requirements of Local Plan Policy W3.8.

#### **Allocation maps / indicative diagrams**

**AP22.** In addition to week one action point AP9, Council to consider whether the keys to the site maps / indicative diagrams need to be modified so that they are relevant to the specific site and surroundings. For example, “sensitive edge” – to clarify whether it is due to “heritage assets” and / or “low rise context”.

#### **Council Response:**

10.1 The Council has reviewed the key to each indicative diagram and modified them to be specific to the site conditions and surroundings. Please see modifications in the table below:

<i>Site Allocations</i>	<i>Modification to Key</i>
N1.SA1 North Woolwich Gateway	[...] Sensitive edge (heritage asset – <del>low rise context</del> ) Sensitive edge (noise - pollution - infrastructure) [...]
N1.SA2 Rymill Street	[...] Sensitive edge (heritage asset – low rise context) [...]

N2.SA1 Silvertown Quays	[...] Sensitive edge (heritage asset – <b>and</b> low rise context) Sensitive edge (noise - pollution - infrastructure) [...]
N2.SA2 Lyle Park West	[...] Sensitive edge (noise - pollution– infrastructure) [...]
N2.SA3 Connaught Riverside	[...] Sensitive edge (heritage asset – <b>low rise context</b> ) Sensitive edge (noise - pollution - infrastructure) [...]
N2.SA4 Thameside West	-
N2.SA5 Excel Western Entrance	[...] Sensitive edge (heritage assets – <b>low rise context</b> ) [...]
N3.SA1 Royal Albert North	[...] Sensitive edge (heritage assets – <b>low rise context</b> )
N4.SA1 Canning Town East	[...] Sensitive edge (heritage assets – <b>and</b> low rise context) Sensitive edge (noise - pollution - infrastructure) [...]
N4.SA2 Silvertown Way East	[...] Sensitive edge ( <del>heritage assets</del> – low rise context)
N4.SA3 Canning Town Holiday Inn	[...] Sensitive edge ( <del>heritage assets</del> – low rise context) Sensitive edge (noise - pollution - infrastructure) [...]
N4.SA4 Limmo	-
N4.SA5 Canning Town Riverside	-
N5.SA1 Custom House Land surrounding Freemasons Road	[...] Sensitive edge ( <del>heritage assets</del> – low rise context) [...]
N5.SA2 Custom House Coolfin North	[...] Sensitive edge ( <del>heritage assets</del> – low rise context) [...]
N5.SA3 Custom House Land between Russell Road and Maplin Road	[...] Sensitive edge ( <del>heritage assets</del> – low rise context) [...]
N5.SA4 Royal Road	-
N7.SA1 Abbey Mills	[...] Sensitive edge (noise - pollution - infrastructure) Sensitive edge (heritage assets – <b>low rise context</b> ) [...]
N7.SA2 Twelvetrees Park and Former Bromley By Bow Gasworks	[...] Sensitive edge (heritage assets – <b>low rise context</b> ) Sensitive edge (noise - pollution - infrastructure) [...]
N7.SA3 Sugar House Island	[...] Sensitive edge (heritage assets – <b>low rise context</b> ) [...]
N8.SA1 Stratford Central	[...] Sensitive edge (heritage assets – <b>low rise context</b> ) [...]
N8.SA2 Stratford Station	[...] Sensitive edge (noise - pollution– infrastructure) Sensitive edge ( <del>heritage assets</del> – low rise context) [...]
N8.SA3 Greater Carpenters District	[...] Sensitive edge (heritage assets – <b>low rise context</b> ) Sensitive edge (noise - pollution– infrastructure) [...]
N8.SA4 Stratford High Street Bingo Hall	[...] Sensitive edge (heritage assets – <b>and</b> low rise context) [...]

N8.SA5 Stratford Town Centre West	[...] Sensitive edge (noise - pollution– infrastructure) [...]
N8.SA6 Stratford Waterfront South	[...] Sensitive edge (noise - pollution– infrastructure) [...]
N8.SA7 Rick Roberts Way	[...] Sensitive edge (heritage assets – low rise context)
N8.SA8 Bridgewater Road	-
N8.SA9 Pudding Mill	-
N8.SA10 Chobham Farm North	[...] Sensitive edge (heritage assets – low rise context) Sensitive edge (noise - pollution - infrastructure) [...]
N9.SA1 Plaistow North	[...] Sensitive edge (heritage assets – low rise context) Sensitive edge (noise - pollution - infrastructure) [...]
N10.SA1 Balaam Leisure Centre	[...] Sensitive edge (heritage assets – <b>and</b> low rise context) [...]
N10.SA2 Newham 6th Form College	[...] Sensitive edge (heritage assets – low rise context) [...]
N10.SA3 Newham Leisure Centre	[...] Sensitive edge (heritage assets – low rise context) [...]
N10.SA4 Balaam Street Health Complex	[...] Sensitive edge (heritage assets – low rise context) [...]
N11.SA1 East Beckton Town Centre	[...] Sensitive edge (heritage assets – low rise context) [...]
N11.SA2 Cyprus	-
N11.SA3 Alpine Way	[...] Sensitive edge (noise - pollution– infrastructure) Sensitive edge (heritage assets – <b>and</b> low rise context) [...]
N13.SA1 East Ham Western Gateway	[...] Sensitive edge (heritage assets – low rise context) <del>Sensitive edge (noise - pollution– infrastructure) [...]</del>
N13.SA2 East Ham Primark	[...] Sensitive edge (heritage assets – low rise context) [...]
N13.SA3 Former East Ham Gasworks	[...] Sensitive edge (heritage assets – low rise context) [...]
N14.SA1 Shrewsbury Road health complex	[...] Sensitive edge (heritage assets – <b>and</b> low rise context) [...]
N15.SA1 Lord Lister Health Centre	[...] Sensitive edge (heritage assets – low rise context) [...]
N15.SA2 Woodgrange Road West	[...] Sensitive edge (heritage assets – <b>and</b> low rise context) Sensitive edge (noise - pollution - infrastructure) [...]

## **Metropolitan Open Land**

**AP12.** AP23. Council to provide a list and map of all alterations to MOL boundaries that are made in the Plan and provide a brief summary of the exceptional circumstances for each.

### **Council Response:**

11.1 A list and map of all alterations to MOL boundaries that are made in the Plan together with a summary of the exceptional circumstances for each can be found in Appendix 1