

LONDON BOROUGH OF NEWHAM

LOCAL PLAN INDEPENDENT EXAMINATION IN PUBLIC IN7: ACTION POINTS FROM WEEK 3 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.

London Plan target and projected completions 2025 to 2027

AP24. Council to amend the proposed modification to paragraph 3.174 to refer to the projected completion figures for the period 1 April 2025 to 31 March 2027 and what they indicate the total shortfall against the London Plan target would be over the period 2019 to 2027 (as well as referring to the actual completion figures 2019 to 2025).

Council Response:

- 1.1 Please see the below suggested amends to be added to the Schedule of Proposed Modification Matters 1 to 16 (Colour coded) (ED020a) to address this action point.
- 1.2 Please note the above modification uses figures from Housing Trajectory FY2024.25 EXAMINATION PINS (EWS026a) but can be updated to reflect any changes resulting from amended site phasing identified through review of the borough's 5 year land supply.

Reference	Modification proposed	Part of the Plan
FMO5	<p>[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). Projected completion figures for the period 2025/26 to 2026/27 indicate that 3,916 further units will be delivered, meaning a total predicted shortfall of 16,570 homes against the London Plan target between 2019/20 and 2026/27.</p> <p>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</p>	Policy H1 Justification. Paragraph 3.174

	<p>31 March 2029. Over the longer-term Newham will make up our historic shortfall against the London Plan targets.</p> <p>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. This range target is capacity-derived, based on: approved planning permission figures; design-led capacity testing of site allocations; capacity assumptions from the Greater London Authority's 2017 Strategic Housing Land Availability Assessment; and capacity assumptions from lapsed application sites. Newham has also taken forward the housing capacity assumptions on small sites set out in the London Plan. The higher growth figures are dependent on significant infrastructure projects unlocking development sites and optimised housing delivery on comprehensively masterplanned site allocations. Supply will be measured through a stepped trajectory, based on the lower range housing target of 45,611, with a different target for every five year phase of the Plan., as follows:</p> <p>[Table] Delivery Period Years Annual Delivery Target</p> <p>Short term 2023/24 – 2027/28 2,974</p> <p>Medium term 2028/29 – 2032/33 3,836</p> <p>Long term 2033/34 – 2037/38 3,475</p>	
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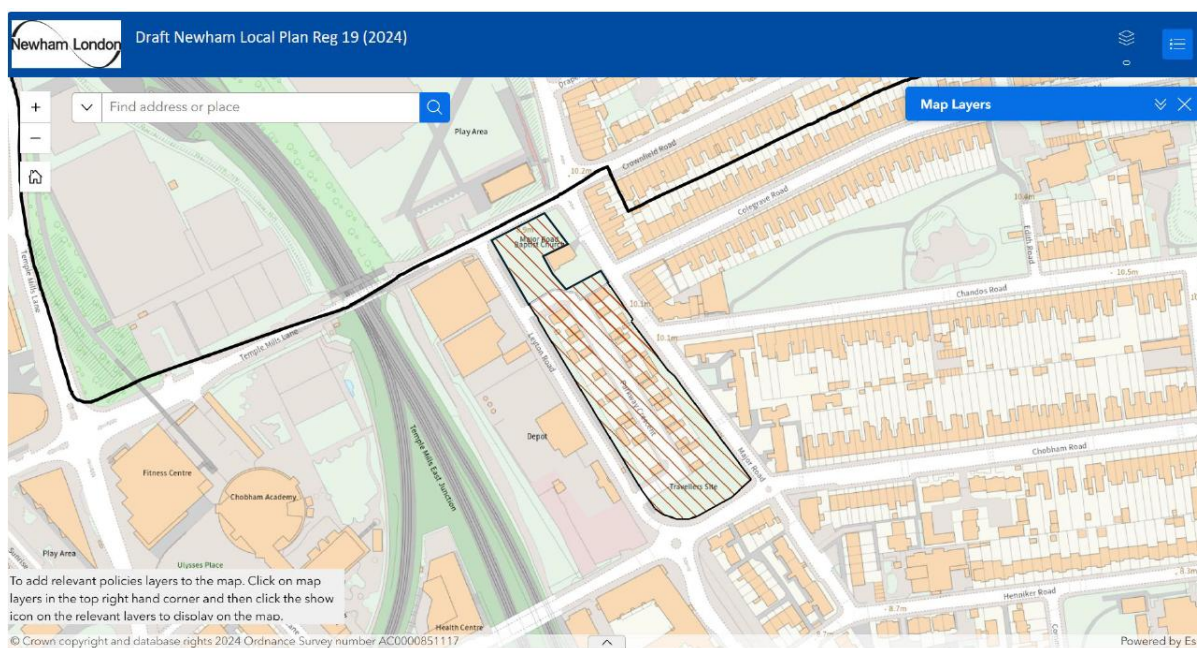
Gypsy and Traveller accommodation

AP25. Council to prepare a change to the policies map to include the area to the north of the existing pitches within the designated site safeguarded for Gypsy and Traveller accommodation (as shown on the map in Appendix 1 to the Council's matter 7 statement¹).

Council Response:

2.1 Please see below the proposed change to the borough's policies map. This would amend both the PDF policies map (SD003) and the interactive GIS map available on the Council's website.

¹ EWS038.



AP26. Council to consider whether the proposed modification to policy H10 part b and new requirement c is necessary and appropriate in terms of allowing transit sites and sites for negotiated stopping in flood zone 2 without application of the exception test.

Council Response:

2.2 The original proposed modification was based on the NPPG Annex 3: Flood Risk Vulnerability Classification. The Council had considered that:

- Permanent pitches fall within Highly Vulnerable – “caravans, mobile homes and park homes intended for permanent residential use”.
- Transit pitches fall within More Vulnerable – “sites used for holiday or short-let caravans and camping, subject to a specific warning and evacuation plan”.

2.3 However, advice from our environmental colleagues indicates that transit pitches may not be comparable to short-let caravan sites due to their management and operational characteristics. As a result, they may not fall within the ‘More Vulnerable’ category. Consequently, the proposed modification may no longer be required.

Tall Buildings

AP27. Council to amend the potential modification to policy D4 set out in the responses to AP5 and AP13²:

- Delete “only” in the first sentence of part 2.
- Consider whether TBZ5 Gallions Reach should be referred to in any other elements of the spatial hierarchy set out in part 2 (in addition to 2c and 2f) to reflect the transformation of Beckton Riverside proposed in policies BFN1 part 1(a)(i), HS1 part 2, N17 and N17.SA1.
- Clarify what is meant by “high level of public transport accessibility” in part 2a.
- Consider whether part 2a should refer to local centres as well as town centres.

² ED17a and ED19.

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| <ul style="list-style-type: none">e) Clarify part 2d, including addressing how it could be applied to locations adjoining or close to tall building zones but also other locations that may be appropriate in the context of part 2a³.f) Ensure part 2e relating to town and local centres is consistent with part 2a.g) Clarify whether all or some of the criteria would need to be met. |
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Council Response:

3.1 The following modifications are proposed to D4.2 in response to AP27.

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 which aim to improve public transport accessibility 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;

³ That may require adding an additional criteria so that the two different types of location (ie adjoining/close to a TBZ and elsewhere in accordance with part 2a) are addressed separately.

f) supporting industrial intensification in SILs within TBZ4: Beckton, TBZ5: Gallions Reach and TBZ22: Thameside West.

3.2 In regard to the proposed modification of AP27.b the Council has proposed a different wording for policy D4.c to acknowledge the opportunity for transport improvement in areas of poor levels of public transport accessibility within Opportunity Areas. This approach is consistent with the methodology used to identify suitable locations for tall buildings and suitable height hierarchy as highlighted in the Tall Building Annex (EB023). As shown in Fig.3 of the document, areas of poor level of public transport accessibility were considered in principle not suitable for tall buildings. However, when those areas where within an Opportunity Area have been carried forward as suitable locations for tall buildings developments. The High Public Transport Accessibility Level evidence currently available to the Council doesn't include any projection for the accessibility improvement in Beckton Riverside. Therefore, In the absence of such projections, the appropriate building heights for the site must be guided by the existing context and the current PTAL rating, which ranges from 0 to 3.

[..]

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 they meet the following criteria:

- a. be located in an area with high level of public transport accessibility (PTAL 4-6) within local or town centre, or be located in an Opportunity Area; and**
- b. demonstrate they don't detract from important landmarks and key views set in the adopted conservation area appraisal and management plans; and**
- c. demonstrate they don't harm the protected vista set out in the London View Management Framework (LVMF), and**
- d. demonstrate to positively contribute to the legibility of the tall building clusters identified in the tall building zones by transitioning from the height of the existing context to the appropriate height range of adjoining tall building zone set in Table 1; or**
- e. demonstrate they can positively mark the presence of a local or town centre by aligning with the height of the tall building zones listed in D4.2 (e) while managing the transition from the height of the existing context; and**
- 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.**

3.3 All amendments to Policy D4 arising from the Week 3 hearing session have now been consolidated and incorporated into the updated Schedule of Modifications

AP28. Council to prepare changes to the policies map to:

- Reflect the potential changes to the Tall Building Zone heights and boundaries described in response to AP14 illustrated on the modified version of the map on page 79 of the Plan⁴.
- Designate the Opportunity Areas.

Council Response:

3.4 The Council is preparing the required changes to the Policies Map in response to AP28, and these will be made available by 11 February.

Purpose Built Student Accommodation

AP29. Council to consider whether the modifications to policy H8 and implementation text referred to in the five bullet points above⁵ would materially affect policy H8 and would therefore be main modifications (rather than minor modifications or non-essential “improvements”).

Council Response:

4.1 Please see the below colour coded table to indicate what type of modification is proposed

4.2 MO66.1 and MO67.3 are main modifications noting they affect the way Policy H8 would be implemented. MO67.1 is a minor modification, noting it is a terminology change that would not materially affect the policy implementation

Reference	Modification proposed	Part of the Plan
MO66.1	<p>1. New purpose-built student accommodation in Stratford and Maryland neighbourhood will only be supported where:</p> <p>a. it is located within or adjacent to an existing or approved campus development in the neighbourhood; or</p> <p>b. it is solely providing a replacement facility with no net increase in bed spaces.</p> <p>2. New purpose-built student accommodation in all other neighbourhoods outside Stratford and Maryland will only be supported where:</p> <p>a. it is located within or adjacent to an existing or approved campus development in the borough; or</p> <p>...</p> <p>d. it is solely providing a replacement facility with no net increase in bed spaces or it is located within or adjacent to an existing or approved campus development in the borough.</p> <p>4. New purpose-built student accommodation should:</p> <p>...</p> <p>c. where purpose-built student accommodation is being delivered within or</p>	Policy H8 Policy parts 1a, 2a, 2d 4c and 5

⁴ ED19 and ED21.

⁵ Subject to any amendments necessary as a result of other action points.

	<p>adjacent to an existing or approved campus development in the borough in accordance with H8.1.a or H8.2.d, the nominations agreement should be secured for occupation by students of the higher education provider that the development is located is within or adjacent to.</p> <p>5. Developments delivering purpose-built student accommodation should provide ancillary communal space for study and sporting facilities that meet the needs of the student population within a development unless the accommodation is located within 1,200 metres of existing or approved student campus-based facilities for studying and/or sport and recreation that have sufficient capacity to meet any increased need.</p>	
MO67.1	<p>2. New purpose-built student accommodation in all other neighbourhoods outside Stratford and Maryland will only be supported where:</p> <p>...</p> <p>c. it will not create an over-saturation concentration of purpose-built student accommodation; or</p> <p>....</p> <p>4. New purpose-built student accommodation should:</p> <p>...</p> <p>b. in areas of over-saturation concentration, secure all of the bedrooms in the development through a nomination agreement, for occupation by students of one or more higher education providers; and</p>	Policy H8 Policy parts 2c and 4b
MO67.3	<p>This policy will seek to monitor over-saturation concentration of student bed spaces in each neighbourhood. For the purposes of this policy, over-saturation concentration of purpose built student accommodation in a neighbourhood or resulting from a development is considered to be:</p> <p>[...]</p> <p>In assessing overconcentration, student accommodation and other forms of net non-self-contained communal accommodation will be measured using the net number of bed-spaces they provide, while general needs housing will be measured on a unit basis.</p> <p>For the purposes of this policy only, adjacent to is defined as ‘being within 300 metres of’.</p> <p>For the purposes of this policy, ‘campus’ is defined as ‘a cluster of teaching and student facility buildings and purpose built student accommodation that serve a single college or university’.</p>	H8 Implement ation text - ALL section

AP30. Council to prepare potential modifications to policy H8 to:

- a) Delete “with no net increase in bed spaces” from parts 1(b) and 2(d).
- b) Amend the proposed modification to the implementation text relating to the assessment of over concentration referred to in bullet point 3 above to base the calculation on the average number of students living in student only accommodation using the published census data⁶
- c) Clarify that part 2(c) relating to over concentration only applies to the locations referred to in part 2(b) ie not within or adjacent to an existing or approved campus in Stratford and Maryland (1(a)) or other neighbourhood (2(a)).
- d) Amend part 5 to clarify what is meant by “sporting facilities”.

Council Response:

4.3 Please see the below suggested modifications to address AP30.a-d. These are colour coded in accordance with the key in ED020a.

Reference	Modification proposed	Part of the Plan
FMO48	<p>1. New purpose-built student accommodation in Stratford and Maryland neighbourhood will only be supported where:</p> <p>a. it is located within or adjacent to an existing campus development in the neighbourhood; or</p> <p>b. it is solely providing a replacement facility with no net increase in bed spaces.</p>	Policy H8 Policy Part 1b
FMO49	<p>2. New purpose-built student accommodation in all other neighbourhoods outside Stratford and Maryland will only be supported where:</p> <p>a. it is located within or adjacent to an existing campus development in the borough; or</p> <p>b. it is in a town centre or local centre location well connected by public transport (with a minimum Public Transport Accessibility Level of 4); and it will not create an over-saturation of purpose-built student accommodation; or</p> <p>d.c. it is solely providing a replacement facility with no net increase in bed spaces or it is located within or adjacent to an existing campus development in the borough.</p>	Policy H8, Policy Part 2b-d
MO67.1	<p>2. New purpose-built student accommodation in all other neighbourhoods outside Stratford and Maryland will only be supported where:</p> <p>...</p> <p>b. it is in a town centre or local centre location well connected by public transport (with a minimum Public Transport Accessibility Level of 4); and it will not create an over-concentrationsaturation of purpose-built student accommodation; or....</p>	Policy H8 Policy parts 2c and 4b

⁶ PPG ID:68-034-20190722.

	<p>4. New purpose-built student accommodation should:</p> <p>...</p> <p>b. in areas of over-saturation-concentration, secure all of the bedrooms in the development through a nomination agreement, for occupation by students of one or more higher education providers; and</p>	
FMO50	<p>4. New purpose-built student accommodation should:</p> <p>...</p> <p>c. where purpose-built student accommodation is being delivered within or adjacent to an existing campus development in the borough in accordance with H8.1.a or H8.2.a, the nominations agreement should be secured for occupation by students of the higher education provider that the development is located is within or adjacent to.</p>	Policy H8 Policy part 4c
FMO51	<p>5. Developments delivering purpose-built student accommodation should provide ancillary communal space for study and sporting facilities exercise that meet the needs of the student population within a development unless the accommodation is located within 1,200 metres of existing student campus-based facilities for studying and/or sport and recreation exercise that have sufficient capacity to meet any increased need.</p> <p>...</p> <p>[Justification text Paragraph 3.190] Alongside delivering appropriately located accommodation, the policy also requires the delivery of affordable student bed spaces and looks to ensure that social infrastructure, namely libraries and sport exercise facilities, in proximity of new student accommodation do not face undue pressures as a result of new student populations who require space to study and exercise.</p> <p>...</p> <p>[Implementation text H8.5] Developments for purpose-built student accommodation should provide ancillary communal space for study and sporting facilities exercise to meet the needs of their student population proportionate to the scale of the development.</p> <p>There is an exception to this requirement where existing campus-based student study and/or sports and recreation exercise spaces are within 1,200m of the development (a 15 minute walk, to support the delivery of a network of well-connected neighbourhoods) and have the capacity to meet the increased need from the new development, which would need to be evidenced as part of a submission.</p> <p>Regarding the provision of sporting exercise facilities, consideration should be given to how affordable the facilities are for students to access, recognising this provision should be meeting the needs of students living in the new accommodation.</p>	<p>Policy H8 Policy part 5</p> <p>Policy H8 Justification text paragraph 3.190</p> <p>Policy H8 Implementation text H8.5</p>

FMO52	<p>As of January 2024, around 33 per cent of approvals in the Stratford and Maryland neighbourhood were for student bed spaces.²⁸</p> <p>...</p> <p>²⁸ Percentage calculated using total number of student bed spaces approved, divided by the total student bed spaces plus total general needs dwellings approved in the neighbourhood.</p>	<p>Policy H8</p> <p>Justification text</p> <p>Paragraph 3.188</p>
MO66.2	<ul style="list-style-type: none"> • a proposal would lead to over 800 beds of student housing, including existing or approved purpose built student accommodation sites, being located within a radius of 300 metres from the proposal site an existing purpose built student accommodation site or approved development. 	<p>H8</p> <p>Implementation text - ALL section</p>
MO67.3	<p>This policy will seek to monitor over-saturation concentration of student bed spaces in each neighbourhood. For the purposes of this policy, over-saturation concentration of purpose built student accommodation in a neighbourhood or resulting from a development is considered to be:</p> <p>[...]</p> <p>In assessing overconcentration, student accommodation will be measured using a ratio of the average number of students living in student only accommodation, using the published census data (based on the 2021 Census, 2.4 bedrooms would be counted as a single home). General needs housing will be measured on a unit basis.</p> <p>For the purposes of this policy only, adjacent to is defined as ‘being within 300 metres of’.</p> <p>For the purposes of this policy, ‘campus’ is defined as ‘a cluster of teaching and student facility buildings and purpose built student accommodation that serve a single college or university’.</p>	<p>H8</p> <p>Implementation text - ALL section</p>
FMO53	<p>Part 1 of the policy sets out spatial requirements for the delivery of purpose built student accommodation in the Stratford and Maryland Neighbourhood.</p> <p>In the Stratford and Maryland neighbourhood, developments for purpose-built accommodation will only be permitted where they either deliver a campus-based expansion linked to an existing higher education campus in the neighbourhood or are replacing an existing facility. In the case of campus-based expansions, these developments should be located within or adjacent to an existing campus development in the borough. Replacement accommodation should only re-provide the same number of bedrooms as the existing development and should not result in a net increase of student bed spaces.</p>	<p>H8.1</p> <p>Implementation text</p>

MO67.4	<p>Where a new development would lead to an over-saturation concentration of student accommodation in a neighbourhood (see definition of over-saturation concentration in the 'ALL' implementation text for Policy H8 above), accommodation should either:</p> <ul style="list-style-type: none"> • only re-provide the same number of bedrooms as the existing development and should not result in a net increase of student bed spaces solely provide a replacement facility; or • deliver a campus-based expansion linked to an existing higher education campus in the neighbourhood. These developments should be located within or adjacent to an existing campus development in the borough. 	H8.2 Implementation text
MO67.5	<p>Areas of over-saturation concentration will be assessed in accordance with the definition of over-saturation concentration in the 'ALL' implementation text for Policy H8 above.</p> <p>In areas that don't experience over-saturation concentration of purpose-built student accommodation, the majority of purpose-built student rooms are required to be secured through a nominations agreement as part of a development's legal agreement. This agreement should ensure that reasonable endeavours are used to secure the majority of the bedrooms in the development, including all of the affordable student accommodation bedrooms, for occupation by students of one or more higher education providers by the point of first occupation.</p> <p>At pre-application stage, a letter of comfort should also be provided by the interested Higher Education Provider(s), showing the provider's intent to continue discussions with the developer and indicate their likelihood to enter into contractual obligations with the developer in relation to the proposals. The letter of comfort should also outline the provider's present and future accommodation needs, and how the design of the development meets these needs.</p> <p>If a nominations agreement cannot be secured by the point of first occupation, the local planning authority should be notified to show that all reasonable endeavours have been taken. In the interim, a cascade mechanism of direct lets should be secured. The following hierarchy will be applied:</p> <ul style="list-style-type: none"> • full-time higher-education students at local Higher Education Providers (within Newham's borough boundary). • those at other London HEPs with good sustainable transport connections to the site. • any other higher-education student at a London HEP campus. • as a last resort, any other higher-education student with a need to reside in London. <p>Proposals that would create or worsen an over-saturation concentration of purpose-built student accommodation should secure all of the bedrooms in the development through a nomination agreement with a higher education provider(s). Where purpose-built student accommodation is being delivered within or adjacent to an existing campus development in the borough in accordance with H8.1.a or H8.2.ad, the policy requires the nominations</p>	H8.4 Implementation text

	<p>agreement to be secured for occupation by students of the higher education provider that the development is located is within or adjacent to.</p> <p>Proposals creating an over-saturation concentration will need to provide additional certainty around a nominations agreement being signed prior to first occupation of the development in accordance with the requirements of parts 4.b and 4.c of the policy. Developments seeking to comply with parts 4.b and 4.c of the policy will not have a cascade mechanism of direct lets forming part of their legal agreement. Without sufficient certainty of nominations provided throughout pre-application and application discussions, an application will be refused.</p> <p>In order to demonstrate certainty around a nominations agreement being signed, it is expected that the Higher Education provider(s) who are expected to sign up to a development's nominations agreement attend pre-application meetings for a proposal. This is to demonstrate that the design of a development has taken into consideration the needs of the Higher Education provider whose students the development will be accommodating.</p>	
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Houses in multiple occupation and large-scale purpose built shared living

AP31. Council to prepare a potential modification to policy H9 part 6 to clarify that it does not apply to ancillary facilities such as gyms or shared workspaces provided specifically for residents of the accommodation.

Council Response:

5.1 Please see the below suggested modifications to address AP31. This is colour coded in accordance with the key in ED020a.

Reference	Modification proposed	Part of the Plan
MO68	<p>Part 6 of the policy does not apply to ancillary facilities such as gyms or shared workspaces provided specifically for residents of the accommodation.</p> <p>Suitable locations are those which are defined as acceptable for Main Town Centre uses under Local Plan Policy HS1, Policy HS3 and Policy J1 and social infrastructure under Policy SI2.</p>	Implementation text H9.6

Housing design and quality

AP32. Amend the proposed main modification to policy H11 part 3(e) to read:

“Purpose-built student accommodation should provide accessible student accommodation having regard to London Plan Guidance: Purpose-built Student Accommodation and local evidence of need” (or similar)

Council Response:

6.1 Please see the below suggested modifications to address AP32. This is colour coded in accordance with the key in ED020a.

Reference	Modification proposed	Part of the Plan
MO71	<p>3. New developments of specialist and supported housing or residential other than general needs housing should have evidenced regard to the following applicable quality design standards:</p> <p>e. Purpose-built student accommodation should provide accessible student accommodation having regard to London Plan Guidance: Purpose-built Student Accommodation and local evidence of need. either:</p> <p>i. ten per cent of new bedrooms to be wheelchair-accessible in accordance with Figure 52 incorporating either Figure 30 or 33 of British Standard BS8300-2:2018 Design of an accessible and inclusive built environment. Buildings – Code of practice; or</p> <p>ii. 15 per cent of new bedrooms to be accessible rooms in accordance with the requirements of 19.2.1.2 of British Standard BS8300-2:2018 Design of an accessible and inclusive built environment. Buildings – Code of practice.</p> <p>...</p> <p>[H11.3 Implementation text] Requirements for the delivery of accessible purpose-built student accommodation (BS 8300-2:2018) is available on the bsi.knowledge website: BS 8300-2:2018 31 Jan 2018 BSI Knowledge (bsigroup.com).</p>	<p>Policy H11 Policy Part 3e</p> <p>Implementation text H11.3</p>

AP33. Council to prepare a potential modification to policy H11 part 7 to clarify that:

- a) The requirements are subject to taking account of site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings⁷.
- b) The requirements relating to wheelchair accessible homes apply only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling⁸.

Council Response:

6.2 Please see the below suggested modifications to address AP33. This is colour coded in accordance with the key in ED020a.

6.3 With regards to AP33, we consider this is most appropriate to add to the policy's implementation text, noting the requirement to deliver M4(2) and M4(3) units is established by the London Plan, and similar flexibility is accounted for in London Plan policy D7's (Accessible housing) implementation text.

Reference	Modification proposed	Part of the Plan
FMO54	<p>7. All new residential developments should:</p> <p>...</p> <p>c. where they are delivering affordable social rented wheelchair user accessible dwellings (Part M4[3](2)(b)), be designed to provide:</p> <ul style="list-style-type: none"> i. affordable wheelchair user dwellings (Part M4[3]) that are a mix of dwelling sizes and all such dwellings contain only double and not single bedrooms; and ii. where feasible, two lifts, where such dwellings are provided on upper floors; and iii. a layout that allows sufficient room for turning circles within the dwellings and in communal areas when furniture layouts are taken into consideration; and iv. a layout that avoids long corridors with unpowered heavy communal doors; and v. a layout that avoids long travelling distances from dwellings to blue badge parking bays. 	Policy H11 Policy part 7.c
FMO55	<p>[New paragraph inserted at the start of the policy implementation text for H11.7]</p> <p>The requirements of Part 7.a are subject to taking account of site-specific factors such as vulnerability to flooding, site topography, and other</p>	Implementation text H11.7

⁷ PPG ID:56-008-20150327.

⁸ PPG ID:56-009-20150327.

	<p>circumstances which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings. In exceptional circumstance, and where robust justification is provided, developments may warrant flexibility in the application of the accessible housing standards M4(2) and M4(3). For example, lifts may not be achievable on constrained sites with blocks of four storeys or less, and affected dwellings above ground floor may be required to satisfy the mandatory building regulations requirements of M4(1) via the Building Control process.</p>	
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Requirement for provision of employment floorspace on allocations

AP34. Council to consider whether the requirement to provide, “as a minimum”, the same quantity of employment floorspace as the permitted schemes is justified for each site having regard to the relevant planning permissions (and taking account of AP35 below).

Council Response:

7.1 The Council consider the consented employment floorspace is justified to be applied as one of the benchmarks as the employment floorspace capacity on a site since it indicate the potential capacity that the site can deliver, especially when a site is being cleared. We propose modifications to Policy J3 as outlined in our response to AP35 below and propose to include reference to Policy J3 in all site allocations that are designated for employment use as listed under Implementation Text J2.2.

7.2 Regarding the four specific sites namely N2.SA4, N7.SA2, N7.SA3 and N8.SA9, following modifications are proposed:

- N2.SA4

The employment uses should be consistent with Local Plan Policy J1, and within the Strategic Industrial Location should prioritise industrial large scale industrial and small scale light industrial, suitable for clean, green and low carbon industries, cultural and creative production / manufacturing and digital and high technology industries. Development within the Local Mixed Use Area designation should be consistent with the requirements of Local Plan Policy J1. Development on the site should **maintain no net loss or deliver a net gain of industrial floorspace capacity as well as protecting the function and integrity of SIL where possible following Local Plan Policy J3** ~~deliver the same quantity of industrial floorspace as the permitted scheme.~~

- N7.SA2

The employment floorspace should be consistent with Local Plan Policy J1. The Gasholders portion of the site should prioritise industrial floorspace in the form of light industrial workspace suitable for micro-businesses and small and medium enterprises. There is potential for industrial floorspace to be tailored to specialist sectors including high tech media, low carbon and digital industries subject to robust market testing to demonstrate suitability.

Development on the ~~remainder of the site~~ should **follow Local Plan Policy J3** ~~deliver the same quantity of employment floorspace as the permitted scheme.~~

- N7.SA3

Plot MU3 should be employment-led development with residential. The employment uses should be consistent with Local Plan Policy J1 and prioritise industrial floorspace suitable for modern light industrial uses, including for creative industries, and business and flexible workspace. **Development on the site** ~~The other development plots~~ should **follow Local Plan Policy J3** ~~deliver the same quantity of employment uses as the permitted scheme.~~

- N8.SA9

The employment uses should be consistent with Local Plan Policy J1 and prioritise industrial floorspace, including co-location with residential as part of the development around the Pudding Mill DLR Station and at Legacy Wharf. Development to the west of Cooks Road should be consistent with the Local Mixed Use Area designation. Development **on the site** should **follow Local Plan Policy J3** ~~provide the same quantity of business and industrial floorspace as the permitted schemes.~~

Protecting employment floorspace

AP35. Council to prepare a potential modification to policy J3 to:

- a) Amend the title to “protecting existing employment capacity” (or similar).
- b) Address circumstances where a site previously in industrial use is disused, partially disused, cleared, partially cleared and/or in meanwhile use, including by clarifying how the quantity of any potential reprovision of employment floorspace would be calculated.

Council Response:

- 8.1 a) We propose to amend the title of Policy J3 to “protecting employment ~~floorspace~~ **capacity**”. We also propose the following modifications to Policy J3:

J3 Main Policy Text

2. All developments that result in net loss of employment capacity in terms of floorspace (including yard space) or jobs on Local Mixed Use Areas (LMUAs) will not be supported and should seek to reprovide suitable employment floorspace ~~for any existing businesses on the site.~~ Developments on LMUAs which cannot incorporate employment floorspace to accommodate any existing businesses are required to provide a suitable and robust Relocation Strategy to relocate these existing businesses to suitable alternative employment premises or sites.

3. Proposals that result in the net loss of employment **capacity in terms of** floorspace (including yard space) or jobs on Micro Business Opportunity Areas (MBOAs) will not be supported [...]

4. All developments in site allocations designated to deliver employment floorspace should seek to reprovide suitable employment floorspace **capacity unless proposal can demonstrate that there is no current or future demand for employment uses for the site through thorough marketing activity** ~~for any existing businesses on the site.~~ All developments in site allocations with existing in-use employment floorspace, which cannot incorporate employment floorspace to accommodate these existing businesses, are required to provide a suitable and robust

Relocation Strategy to relocate any existing businesses to suitable alternative employment premises or sites.

5. Proposals that result in the net loss of office (E(g)(i)), research and development (E(g)(ii)), light industrial (E(g)(iii)), general Industrial (B2), storage or distribution (B8) (including dark kitchen/shop and micro fulfilment) and industrial related sui generis (SG) floorspace **capacity** outside employment designations and site allocations will only be supported if the following criteria are met: [...]

8.2 b) We propose adding implementation text to Policy J3 to address different circumstances in informing the employment floorspace capacity:

J3 Implementation text

ALL - In applying the principle for no net loss of employment floorspace capacity, the following definition should be used:

- **On an actively operating employment site, the existing floorspace (including yard space) should inform capacity calculations.**
- **On a vacant employment site, the most recent employment floorspace prior to any demolition, or any recent consent that has secured a minimum amount of employment floorspace at the site, whichever is appropriate, should inform capacity calculations.**
- **On a site with building(s) previously in employment use that have been disused or partially disused, the gross internal area of the existing building(s) should inform capacity calculations.**
- **Meanwhile use is not counted towards employment floorspace capacity.**

Proposed extension to Silvertown local centre

AP36. Council to consider whether the proposed extension to the Silvertown local centre needs to be amended on the policies map and indicative diagram for allocation N2.SA1 having regard to the two key functions of the centre in policy HS1 (meeting local catchment needs for retail, leisure, services and community uses, and supporting an incidental visitor economy); the Royal Docks and Beckton Riverside Opportunity Area Planning Framework; and the planning permission and current planning application

Council Response:

9.1 The Council considers that a proposed extension to the Silvertown Local Centre is appropriate, and the boundary for this extension is set out in the appended Town Centre Network Review Methodology Paper Update 2026, along with its accompanying justification. This proposed extension will be shown on the Policies Map and the indicative diagram for allocation N2.SA1.

9.2 Please note that, in light of this strategic review to reflect updated site-specific circumstances that have evolved since the Local Plan submission, it is also intended to update the Policies Map and indicative diagrams for site allocations N7.SA3 (Sugar House Island) and N17.SA1 (Beckton Riverside) to reflect updated boundaries for the Town/Local Centres and neighbourhood parade expected to come forward in these allocations.

Markets and events / pop-up spaces

AP37. Council to amend the potential modifications to policy HS4 part 1 (development impacting on an existing market) and associated implementation text set out in schedule ED020a having regard to the changes proposed by Friends of Queen's Market in document EOD007. These amended modifications should include reference to the following, where relevant and appropriate:

- Indoor and outdoor markets.
- Maintaining or increasing the number of pitches.
- Definition of a market pitch.
- Taking into account the existing character of the market.
- The health and social value of the market and/or Health and Social Value Screening Assessment (BFN3).
- A Markets Management Plan.
- Consultation with trader representatives.
- Avoiding or mitigating harmful impacts on the operation and quality of the market including wind, overshadowing or pollution.

Council Response:

10.1 Please see proposed modifications below to policy HS4 Part 1 and its implementation text. These are reflected in the revised schedule of modifications under references FMO17 and MO15.2.

HS4 Policy:

1. Development impacting on an existing ~~internal or external~~ **indoor or outdoor** market site will only be supported where:

- a. The number of pitches is maintained or ~~enhanced~~ **increased**, alongside provision of appropriate storage and servicing facilities, both during development (including temporary arrangements) and upon completion. And
- b. The overall **layout**, visibility, quality and management of the market and its public realm will be improved **through co-design, taking into account the existing character of the market. And**
- c. **Proposals identify and positively contribute to the health and social value of the market, in line with Policy BFN3.**

HS4.1 Implementation text:

A pitch is defined as a 3 by 3 meters area, unless otherwise agreed with the Council, in consultation with its Markets operations team.

Appropriate ~~Servicing~~ facilities should include adequate access to parking and unloading space, storage, waste facilities, **public toilets**, and utilities including suitable voltage electricity supply where hot food service will be part of the market offer.

Any redevelopment of or adjacent to a market will be used as an opportunity to:

- rectify any existing poorly functioning physical aspects of the market (e.g. entrances, layout, visitor circulation, quality of materials and servicing layouts), **through co-design with market traders, users and the market operator in line with policy BFN2.**
- **Protect or mitigate the microclimate of the market (e.g. wind or overshadowing) in line with Policy D6.**
- **Respond to the social and health value of the market, in line with the Health and Social Value Impact Screening Assessment requirement of Local Plan Policy BFN3.**
- **Revise or create a Market Management Plan that addresses any temporary market arrangements, where relevant, and the permanent functioning of the market. This should incorporate all relevant management aspects set out in implementation section HS4.3.**

Public realm enhancements should be considered as per Local Plan Policies D2 and HS2.7-8.

Queen's Market

AP38. Council to amend the potential modification to policy N14 to refer to the adjoining shops as well as the “covered market” (and potentially the inter-relationship between them).

Council Response:

- 11.1 Please see proposed modifications below to policy N14 to refer to the adjoining shops as well as the “covered market”.

Policy N14

[...]

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

- a. requiring development impacting the market to demonstrate how it protects and contributes to the social and economic value of the market, including maintaining stall rent affordability, 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, in 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;

Employment and skills tariff-based financial contributions

AP39. Council to clarify the total financial tariff-based contribution assumed for each of the development typologies / allocations in the viability assessment based on the formula set out in the Plan.

Council Response:

- 12.1 Employment and training contributions: the adopted Local Plan sets a target for financial contributions from developments to fund training initiatives which are equivalent to 35% of construction phase jobs in all types of development and 50% of end user jobs in developments of employment floorspace. These targets would be applied flexibly to not excessively affect viability, particularly on schemes with large amounts of commercial floorspace. This requirement that is incorporated into the emerging Local Plan have been tested along with an alternative (lower) contribution of 25% of construction phase jobs and 25% of end user jobs. The average reduction in residual land values resulting from the emerging Local Plan policy equates to 13.3%. However, it should be noted that in some development scenarios tested (where starting residual land values are low), the impact of this policy requirement can be as high as a 53% reduction for emerging policy contributions. Given the wide range of impacts, this policy would continue to be applied on a flexible and 'subject to viability' basis, in line with the current approach.
- 12.2 Appendix 1 sets out the levy as a share of total construction costs, which in most cases is under 3%. This provides a strong indication that the levy is modest and unlikely to have any material effect on the overall appraisal outcome.