

London Borough of Newham
Local Plan Main Modifications Consultation Report
July 2026

1. Introduction

- 1.1 Between 26 May and 7 July 2026, the Council carried out consultation on the '[Schedule of Main Modifications to the Newham Local Plan](#)' (ED030) on behalf of the Planning Inspector conducting the independent examination of the Newham Local Plan ([Regulation 19 Draft Submission Local Plan 2024 Part 1](#) (SD002a) and [Regulation 19 Draft Submission Local Plan 2024 Part 2](#) (SD002b)).
- 1.2 The Schedule set out the Main Modifications to the Newham Local Plan that the Planning Inspector considers necessary to make the submission Plan sound. Alongside the Schedule of Proposed Main Modifications, the Inspector also invited comments on '[Proposed changes to the Local Plan Policies Map](#)' (ED031), '[Integrated Impact Assessment \(IIA\) Addendum](#)' (ED032) and the '[Habitats Regulations Assessment \(HRA\) Addendum](#)' (ED033), prepared by the council.
- 1.3 As requested by the Inspector, this Consultation Statement has been prepared by the Council and:
 - Summarises feedback received where this relates to the content of the Main Modifications or the IIA Addendum or HRA Addendum; and
 - Includes a council comment for each key point raised.
- 1.4 Although not subject to public consultation, for completeness, the council also published a '[Schedule of Additional Modifications](#)' (ED034). The Council also published a '[tracked change version of the Local Plan](#)' (ED035) for information only.
- 1.5 For transparency, the Council has also set out its views in relation to comments received on these documents. These comments follow the Main Modification comments under each chapter of the Local Plan.
- 1.6 For transparency, comments submitted during the consultation that do not relate specifically to the proposed Main Modifications have also been summarised. These are set out at the end of each relevant policy section.
- 1.7 This document should be read alongside the full representations received, published here: [Main Modifications Consultation Representations documents – Newham Council](#).
- 1.8 The consultation was publicised through direct notification to all individuals and organisations registered on Newham's Local Plan consultation database, together with all those who had submitted representations to previous Local Plan consultations and/or participated in the examination. Consultation documents were available to view online, and hard copies were available at the Council's principal office and Newham libraries.
- 1.9 Representations could be submitted using the Council's online consultation platform (Newham Co-Create), as well as a response form that could be submitted by email or post to the Council. The response form was available on the Council's website, and hard copies were available at Newham libraries and the Council's principal office.
- 1.10 This consultation summary builds on the [Newham Local Plan Refresh Regulation 22 Consultation Statement](#) (SD017). Taken together these documents constitute the full consultation report.
- 1.11 Following the Main Modifications consultation, the modifications in this schedule are indicated as follows:
 - ~~Strikethrough~~ (deleted text)
 - **Bold underline** (new or amended text)
 - Red text indicates a further proposed modification to previously proposed modification: ~~Strikethrough~~ (deleted text) / **Bold underline** (new or amended text)

2. Summary of representations

- 2.1 A total of 40 representations were submitted during the consultation; comprising 313 individual comments. There were no non-duly made representations.
- 2.2 This summary focuses primarily on comments relating to the Main Modifications and the proposed Policies Map changes. However, for completeness, it also includes a summary of comments received on the Additional Modifications and comments not related to the proposed Main Modifications.

1. General Comments

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
All main modifications	N/A	MMC-E-176	Port of London Authority	No objections to any Main Modifications	Support noted.
All additional modifications	N/A	MMC-E-238	Environment Agency	No objections to any Additional Modifications	Support noted.
Comments not specific to Main Modifications					
N/A	N/A	MMC-E-291	Gail De Souza	Concerned that the modifications are not fully supported by transparent evidence demonstrating how the infrastructure necessary to deliver the growth set out will be secured, including potential funding gaps and timing of delivery.	This comment does not relate to a specific proposed Main Modification. The Local Plan is supported by a host of evidence base documents setting out the projected infrastructure requirements across the borough. This includes the Built Leisure Needs Assessment, the Green and Water Infrastructure Strategy and the Sustainable Transport Strategy. The evidence of need has been developed in partnership with relevant public bodies involved in the delivery of infrastructure, reflecting known requirements at the time of their writing. Newham is committed to delivering the necessary infrastructure to support growth, as highlighted by the neighbourhood and thematic policies, as read together. Further, the Council has formally adopted (via Cabinet meetings) many of the strategies developed to support the Local Plan, thereby helping to support cross-service delivery. The Local Plan is also supported by an Infrastructure Delivery Plan (EB004), which summarises the evidence base and provides further information on expected funding streams and delivery timescales, where these are known in coordination with relevant public bodies. It is also supported by a viability report (EB099 London Borough of Newham Local Plan Regulation 19 viability report). None of the modifications proposed are inconsistent with the evidence. Further guidance on infrastructure delivery will be provided following adoption, primarily through updates to the Infrastructure Delivery Plan.
N/A	N/A	MMC-E-291	Gail De Souza	Concerned that modifications in ED030, when considered alongside the Integrated Impact Assessment Addendum (ED032), do not sufficiently demonstrate that infrastructure capacity is aligned with planned growth, including a range of social infrastructure, transport infrastructure, utilities and climate adaption infrastructure. Want infrastructure to be delivered in step with development rather than retrospectively.	This comment does not relate to a specific proposed Main Modification. The Local Plan is supported by a host of evidence base documents setting out the projected infrastructure requirements across the borough. This includes the Built Leisure Needs Assessment, the Green and Water Infrastructure Strategy, which also addresses climate resilience, the Strategic Flood Risk Assessment and the Sustainable Transport Strategy. The evidence of need has been developed in partnership with relevant public bodies involved in the delivery of infrastructure, including the Council's Pupil Place Planning team and the North East London Integrated Care Board. These collaborations are proactive and ongoing, as demonstrated through the Duty to Cooperate reports supporting the Local Plan (SD051, SD052, EWS001). Newham is committed to delivering the necessary infrastructure to support growth, as highlighted by the neighbourhood and thematic policies, as read together. The Local Plan is also supported by an Infrastructure Delivery Plan (EB004), which summarises the evidence base and provides further information on expected funding streams and delivery timescales, where these are known in coordination with relevant public bodies. Further guidance on infrastructure delivery will be provided following adoption,

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					primarily through updates to the Infrastructure Delivery Plan that will include updates from infrastructure delivery partners. The Newham Local Plan (Regulation 22) – Integrated Impact Assessment - Final Report Addendum (ED032), assessed the modifications in line with the SEA regulations and ensures that that where negative effects are identified, measures are proposed to avoid, minimise or mitigate (compensate for) such effects. Where positive effects are identified, measures are considered that could enhance such effects.
N/A	N/A	MMC-E-291	Gail De Souza	Concerned that cumulative impacts arising from multiple Main Modifications in ED030 do not appear to be fully assessed in the Integrated Impact Assessment (ED032).	This comment does not relate to a specific proposed Main Modification. The Local Plan was submitted alongside a detailed assessment of impact as set out in the Newham Local Plan (Regulation 22) – Integrated Impact Assessment (SD006) and its appendices (SD007). The matters of cumulative impacts, including equalities impacts, have been thoroughly assessed as part of Matter 1 examination hearings and the Inspector did not identified any issues with regards to the Local Plan meeting the relevant legal duties (see ED001, EWS001 and IN5.1). As set out in the Newham Local Plan (Regulation 22) – Integrated Impact Assessment - Final Report Addendum (ED032), screening findings, none of the Main Modifications significantly affect the findings of the previous IIA work presented in the IIA Report (SD006), which means that the original findings of the IIA with regards to likely impacts of the policies remain relevant and no detailed re-assessment is necessary. Community Wealth Building pledges have informed the objectives of the Local Plan. Newham's commitment to ensuring development is inclusive and promotes health and wellbeing is embedded across policies, for example policies BFN2 , BFN3, D1, D2, SI2, T2) It is not considered that further impact assessment of the policies is required.
N/A	N/A	MMC-E-291	Gail De Souza	Requires further clarity that the Plan consistently considers issues of climate adaption, flood risk management, biodiversity net gain and air quality impacts. Consistency should be demonstrated between ED030 policies and the conclusions of ED032 and ED033.	This comment does not relate to a specific proposed Main Modification. The Local Plan was submitted alongside a detailed assessment of impact as set out in the Newham Local Plan (Regulation 22) – Integrated Impact Assessment (SD006) and its appendices (SD007). The matters of cumulative impacts, including climate adaption and mitigation, have been assessed as part of Matter 1 examination hearings and the Inspector did not identify any issues with regards to the Local Plan meeting the relevant legal duties (see ED001, EWS001 and IN5.1). As set out in the Newham Local Plan (Regulation 22) – Integrated Impact Assessment - Final Report Addendum (ED032), screening findings, none of the Main Modifications significantly affect the findings of the previous IIA work presented in the IIA Report (SD006), which means that the original findings of the IIA with regards to likely impacts of the policies remain relevant and no detailed re-assessment is necessary. The Habitat Regulations Assessment addendum (ED033) concludes that the five modifications found to amend elements of policy that would interact with the findings of the submission HRA all strengthened the provision of recreational space provision as an alternative to Epping Forest SAC, with one (MM72) adding commitment to the Epping Forest SAC Recreation Mitigation Strategy

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					specifically implemented as mitigation for the effects of recreational disturbance on this European site. Flood risk was considered as part of the examination process on a range of matters, including in relation to site allocation (Matter 4, EWS014), specific flood risk policies (Matter 11, EWS050), and water spaces (Matter 12, EWS053), and resulted in a number of modifications being proposed to ensure consistency and effectiveness of flood management across sections of the Plan. Air quality is appropriately managed through policy CE6 (EWS050), with main modification MM64 to Policy H11 providing additional guidance on how housing development can be designed to mitigate impacts (EWS030). The Plan follows national and London Plan standards with regards to biodiversity net gain, with policies supported by Natural England. This has not been changed through the examination process (EWS053). An appropriate monitoring framework is established through indicators 37, 38 and 39 (ED035, pg. 636). It is not considered that further policy changes or impact assessment of the policies is required.
N/A	N/A	MMC-E-291	Gail De Souza	Requires further clarity that changes to the Policies Map (ED031) are justified and consistent with the main modifications (ED030), and do not result in loss of protections for employment land or green designations, or impacts on regeneration and housing strategy, or generate other unintended consequences.	This comment does not relate to a specific proposed Main Modification. The Policies Map modifications (ED031) have arisen as part of the detailed examination discussions related to policies, designations and site allocations and are fully consistent with the relevant main modifications (ED030) to the Plan text. Please refer to the Council's response to examination action points for a detailed explanation of these interrelations (ED017a, ED019, ED024, ED028, and ED029). Overall, the Plan continues promote equitable regeneration that responds to local needs, including for housing. The Plan also continues to protect and promote green space and employment space, including outside of designated areas mapped on the Policies Map, as set out in respective Green and Water Space and Inclusive Economy policies.
N/A	N/A	MMC-E-291	Gail De Souza	Concern that it is not clear how the main modifications will be annually and transparently monitored post-adoption, and what corrective mechanisms exist if targets are not met.	This comment does not relate to a specific proposed Main Modification. The Local Plan includes a Monitoring Framework, which has been subject to additional minor modifications (see ED034 and ED035). The indicators in this framework have been developed to monitor the plan's implementation, building on information known to be available or that will become available as part of the policies' implementation, to ensure it is effective. This responds to the legal responsibility for the Council to publish Authority Monitoring Reports, which will be published as frequently as possible and usually annually. These reports will include data and an assessment of trends against the objectives of policies. Historically, corrective measures that the council has used include ongoing collaboration with key public sector delivery partners, additional targeted training and resourcing for internal delivery teams, as well as more formal reporting such as that required under National Policy with regards to the housing delivery test. The monitoring outcomes are also used to inform future Plan reviews. It is not considered that further changes to the monitoring framework are required.

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N/A	N/A	MMC-E-291	Gail De Souza	Summary of concerns raised that the Proposed Main Modifications in ED030, supported by ED031, ED032 and ED033, must be justified by clear evidence, to demonstrate not only policy compliance, but also that it is realistically deliverable, equitable and capable of supporting sustainable long-term growth across Newham.	Comment noted. Please see detailed responses provided above.

2. Building a Fairer Newham

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
Main Modifications					
MM5	BFN1 Spatial Strategy	MMC-E-191	University College London	Welcomes the increased flexibility regarding BREEAM requirements for meanwhile uses and temporary structures. Objects to the additional wording in which states: “Where this is allowed, extensions in time are unlikely to be granted, to avoid long-term poor quality development”. UCL considers this wording to be overly negative. It argues that the approach is not conducive to high-quality long-term masterplanning and could act as a barrier to delivering important meanwhile uses. UCL proposes: <u>“Where this is allowed, extensions in time are unlikely to be granted, to avoid long term poor quality development will be granted if the meanwhile uses do not result in poor quality development in the long term or where required to facilitate the construction of an approved development, where permitted development rights are not available”</u>	Support noted for increased flexibility for BREEAM requirements. This wording change is not supported. We do not consider this change to the modification to be necessary as the modification was proposed in order to increase flexibility to enable the delivery of meanwhile uses while still ensuring development in the borough is high quality and makes a contribution to tackling the climate emergency. This ensures the Plan secures sustainable development. The Council is satisfied that the plan remains sound without the proposed changes.
MM6	BFN2 Co-designed masterplanning	MMC-E-222	Ballymore Group	Welcome strengthened emphasis on comprehensive and coordinated development. Consider the policy may still delay delivery on complex sites and suggest adding: “Where comprehensive development cannot reasonably be achieved, phased or coordinated delivery will be supported where it can be demonstrated that this would not prejudice the wider objectives of the allocation.”	This wording change is not supported. We do not consider this change to the modification to be necessary as the modification was proposed in order to clarify that delivery could occur in a phased or incremental manner, so long as this was part of a coordinated approach, as required in response to AP42 (see ED028). The importance of ensuring comprehensive development and the successful use of this policy wording in Newham over many years is outlined in the Regulation 19 Consultation Report (SD020). Further flexibility is not required to ensure deliverability and would undermine the Council's ability to ensure coordination, prevent developments from prejudicing each other and secure the optimum use of land. The Council is satisfied that the plan remains sound without the proposed changes.
MM6	BFN2 Co-designed masterplanning	MMC-E-191	University College London	Support the amendments to Policy BFN2	Support noted.
MM7	BFN2 Co-designed masterplanning	MMC-E-222	Ballymore Group	Welcome strengthened emphasis on comprehensive and coordinated development. Consider the policy may still delay delivery on complex sites and suggest adding: “Where comprehensive development cannot reasonably be achieved, phased or coordinated delivery will be supported where it can be demonstrated that this would not prejudice the wider objectives of the allocation.”	See response in relation to Ballymore's comment on MM6.
MM8	BFN2 Co-designed masterplanning	MMC-E-222	Ballymore Group	Welcome strengthened emphasis on comprehensive and coordinated development. Consider the policy may still delay delivery on complex sites and suggest adding: “Where comprehensive development cannot reasonably be achieved, phased or coordinated delivery will	See response in relation to Ballymore's comment on MM6.

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				be supported where it can be demonstrated that this would not prejudice the wider objectives of the allocation.”	
MM8	BFN2 Co-designed masterplanning	MMC-E-191	University College London	Support the amendments to Policy BFN2	Support noted
MM9	BFN2 Co-designed masterplanning	MMC-E-222	Ballymore Group	Welcome strengthened emphasis on comprehensive and coordinated development. Consider the policy may still delay delivery on complex sites and suggest adding: “Where comprehensive development cannot reasonably be achieved, phased or coordinated delivery will be supported where it can be demonstrated that this would not prejudice the wider objectives of the allocation.”	See response in relation to Ballymore's comment on MM6
MM10	BFN2 Co-designed masterplanning	MMC-E-222	Ballymore Group	Welcome strengthened emphasis on comprehensive and coordinated development. Consider the policy may still delay delivery on complex sites and suggest adding: “Where comprehensive development cannot reasonably be achieved, phased or coordinated delivery will be supported where it can be demonstrated that this would not prejudice the wider objectives of the allocation.”	See response in relation to Ballymore's comment on MM6
MM10	BFN2 Co-designed masterplanning	MMC-E-191	University College London	Support the amendments to Policy BFN2	Support noted
MM11	BFN2 Co-designed masterplanning	MMC-E-222	Ballymore Group	Welcome strengthened emphasis on comprehensive and coordinated development. Consider the policy may still delay delivery on complex sites and suggest adding: “Where comprehensive development cannot reasonably be achieved, phased or coordinated delivery will be supported where it can be demonstrated that this would not prejudice the wider objectives of the allocation.”	See response in relation to Ballymore's comment on MM6
MM12	BFN2 Co-designed masterplanning	MMC-E-222	Ballymore Group	Welcome strengthened emphasis on comprehensive and coordinated development. Consider the policy may still delay delivery on complex sites and suggest adding: “Where comprehensive development cannot reasonably be achieved, phased or coordinated delivery will be supported where it can be demonstrated that this would not prejudice the wider objectives of the allocation.”	See response in relation to Ballymore's comment on MM6
MM13	BFN2 Co-designed masterplanning	MMC-E-222	Ballymore Group	Welcome strengthened emphasis on comprehensive and coordinated development. Consider the policy may still delay delivery on complex sites and suggest adding: “Where comprehensive development cannot reasonably be achieved, phased or coordinated delivery will be supported where it can be demonstrated that this would not prejudice the wider objectives of the allocation.”	See response in relation to Ballymore's comment on MM6
MM15	BFN4 Developer contributions and	MMC-E-222	Ballymore Group	Note that the modification is intended to clarify the prioritisation of policy objectives where viability constraints arise. However, Ballymore object to a fixed, plan wide, prioritisation hierarchy.	This wording change is not supported. We do not consider any further modifications to the Plan to be necessary as the modification was proposed so that the policy wording would better reflect the flexibility already afforded in policy BFN4.3 supporting text, as required by AP44 (See ED028). It is

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	infrastructure delivery			Suggest that site-specific infrastructure requirements are clearly recognised and policy is applied with sufficient flexibility to prioritise critical infrastructure where necessary to enable delivery, by adding the following wording to Policy BFN4 (or supporting text) : “The prioritisation of policy requirements will be applied flexibly, having regard to site-specific circumstances. Where site allocations identify critical infrastructure necessary to enable development, this may need to be prioritised to ensure the effective delivery of the scheme.”	considered that the modification, alongside the existing supporting text, which states: 'Where necessary to deliver the provision of infrastructure required as part of a site allocation, or where its provision is considered necessary by internal, regional or national consultees or partner bodies, an alternative prioritisation may be considered more appropriate and/or additional sources of funding to enable the delivery of the required infrastructure may, where possible, be identified by the Council.', already provides sufficient flexibility for enabling infrastructure to be prioritised. The Council is satisfied that the plan remains sound without the proposed changes.
MM15	BFN4 Developer contributions and infrastructure delivery	MMC-E-015	Greater London Authority	Note that the modification is intended to clarify the prioritisation of policy objectives where viability constraints arise. However, the Mayor considers this is insufficient to ensure consistency with London Plan policy Df1D. Propose that more specific changes are needed to part a to include 'necessary public transport improvements'.	This wording change is not supported. We do not consider any further modifications to the Plan to be necessary as the modification was proposed so that the policy wording would better reflect the flexibility already afforded in policy BFN4.3 supporting text and as required by AP44 (See ED028). It is considered that the modification, alongside the existing supporting text, which states: 'Where necessary to deliver the provision of infrastructure required as part of a site allocation, or where its provision is considered necessary by internal, regional or national consultees or partner bodies, an alternative prioritisation may be considered more appropriate and/or additional sources of funding to enable the delivery of the required infrastructure may, where possible, be identified by the Council.', provides sufficient clarity that public transport improvements, in particular those necessary to make the proposal acceptable in planning terms, can and should be prioritised. The Council is satisfied that the plan remains sound without the proposed changes.
MM15	BFN4 Developer contributions and infrastructure delivery	MMC-C-096	NHS Property Services (NHSPS) Limited	Support MM15	Support welcomed.
MM15	BFN4 Developer contributions and infrastructure delivery	MMC-E-013	Transport for London	Note that the modification is intended to clarify the prioritisation of policy objectives where viability constraints arise. However, TfL consider this is insufficient to ensure consistency with London Plan policy Df1D. Propose that part a is amended as follows: a. necessary public transport improvements , affordable and family housing b. local access to employment and training c. delivery of required -infrastructure. .	This wording change is not supported. We do not consider any further modifications to the Plan to be necessary as the modification was proposed so that the policy wording would better reflect the flexibility already afforded in policy BFN4.3 supporting text and as required by AP44 (See ED028). It is considered that the modification, alongside the existing supporting text, which states: 'Where necessary to deliver the provision of infrastructure required as part of a site allocation, or where its provision is considered necessary by internal, regional or national consultees or partner bodies, an alternative prioritisation may be considered more appropriate and/or additional sources of funding to enable the delivery of the required infrastructure may, where possible, be identified by the Council.', provides sufficient clarity that public transport improvements, in particular those necessary to make the proposal acceptable in planning terms, can and should be prioritised. The Council is satisfied that the plan remains sound without the proposed changes.
Additional Modifications					
AM17	BFN1 Spatial Strategy; N4.SA4 Limmo	MMC-E-222	Ballymore Group	Object to the requirement for a minimum 2ha Local park at Limmo peninsula due to viability constraints. Suggest the following modification: “Provision of publicly accessible	This comment does not relate to a proposed Main Modification. The Council's position on this matter is set out in SD030 Newham Local Plan Refresh Regulation 19 Consultation Report: Neighbourhoods Comments.

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				open space will be secured proportionately across the allocation having regard to site constraints and viability.”	
AM19	BFN1 Spatial Strategy	MMC-E-222	Ballymore Group	Support the removal of fixed percentage requirements. Object to the continued reference within supporting text to c.50% affordable housing delivery. Consider this risks creating a residual perception of a borough-wide target and undermining the clarity of the threshold-based approach. Recommended modification – replace with wording confirming: “Affordable housing delivery will be secured in accordance with the London Plan threshold approach, with provision determined through a design-led approach and, where applicable, viability assessment. Regard will be had to the London Plan and up-to-date Mayoral guidance, including any time-limited measures introduced to support housing delivery.”	This comment does not relate to a proposed Main Modification. The Council's position on this matter was discussed on Day 8 and Day 13 of the Examination in Public where it was agreed the Council would reflect the London Plan 2021 approach to affordable housing. It is noted the London Plan includes a 50% Strategic Target.
AM22	BFN4 Developer contributions and infrastructure delivery	MMC-E-222	Ballymore Group	Support the removal of fixed percentage requirements. Object to the continued reference within supporting text to c.50% affordable housing delivery. Consider this risks creating a residual perception of a borough-wide target and undermining the clarity of the threshold-based approach. Recommended modification – replace with wording confirming: “Affordable housing delivery will be secured in accordance with the London Plan threshold approach, with provision determined through a design-led approach and, where applicable, viability assessment. Regard will be had to the London Plan and up-to-date Mayoral guidance, including any time-limited measures introduced to support housing delivery.”	See response in relation to Ballymore's comment on AM19
AM21	BFN3 Social Value and HIA	MMC-E-236	Friends of Queen's Market	Modification supported.	Support noted.
Comments not specific to Main Modifications					
N/A	BFN1 Spatial Strategy	MMC-E-033	Thames Water	Object to changes requested at the regulation 19 consultation stage regarding Beckton Sewage works not being made.	This comment does not relate to a proposed Main Modification. The Council's position on this matter is set out in the Regulation 19 Consultation Report (SD020) page 4

3. Design

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
Main Modifications					
MM16	D1 Design Standards	MMC-E-191	University College London	Object to the addition of the sentence within Implementation text D1.4 stating that a second temporary permission will rarely be justified. UCL considers this approach to be overly restrictive, particularly for large multi-phased development sites. Suggest to delete the sentence or alternatively propose adding the following wording: [...] <u>Nevertheless, it will rarely be justifiable to grant a second temporary permission, except in cases where changing circumstances provide a clear rationale or where required to maintain active use of long term multi-phase development sites.</u>	This wording change is not supported. We do not consider this change to be necessary as the modification was proposed in order to provide a suitable balance between offering planning flexibility for temporary buildings/structures and securing long term quality development in the borough regardless of the scale of the development. This ensures the Plan is consistent and clear. The Council is satisfied that the plan remains sound without the proposed changes.
MM16	D1 Design Standards	MMC-E-191	University College London	Support additional text to Implementation text D4.1. However, suggest the following modification: [...] <u>The choice of construction methods, landscaping, materials and finish should take into account the character of the local context and the impact on the public realm and amenity, balanced against the expected timeframe and scale of the development, to ensure requirements are proportionate to the proposal.</u> [...]	This wording change is not supported. We do not consider this change to be necessary as the modification was proposed in order to provide a suitable balance between offering planning flexibility for temporary buildings/structures and securing long term quality development in the borough regardless of the scale of the development. This ensures the Plan is consistent and clear. The Council is satisfied that the plan remains sound without the proposed changes.
MM17	D4 Tall buildings	MMC-E-222	Ballymore Group	Overall, the proposed Main Modifications represent positive and welcome progress in several areas, including the introduction of a more flexible approach to tall buildings through the concept of “appropriate heights”	Support noted.
MM17	D4 Tall buildings	MMC-E-222	Ballymore Group	Welcome the modification as it moves away from rigid maximum height limits and introduces the concept of “appropriate heights”, which the representor considers to be more consistent with a design-led approach. Support the removal of the word “only” in relation to when tall buildings will be considered acceptable. However, the representor considers that the amended policy does not fully reflect the flexibility provided by London Plan Policy D9. They argues that, as drafted, the policy could operate as a de facto development management tool that constrains site optimisation, rather than enabling a genuinely design-led approach. Suggest amending the policy to make clear that the height ranges in Table 1 are indicative rather than fixed limits. It proposes the following wording:	This wording change is not supported. We do not consider this change to be necessary as the modification was proposed in order to allow a degree of flexibility - as suggested by the GLA and a few developers - whilst reflecting the spatial strategy based on the analysis evidenced in the Tall Building Annex 2024 (EB023) and in the Tall Buildings Topic Paper 2025 (TP004). The proposed modification responds to the action points AP5 (ED017a) and AP13 (ED019) suggested by the Inspector during Week 1 and Week 2 hearing sessions. This ensures the Plan is justified and is in line with London Plan Policy D9 requirements, London Plan Policy D3, Characterisation and Growth Strategy London Plan Guidance (2023) and Tall Building Annex 2024 (EB023). The Council is satisfied that the plan remains sound without the proposed changes.

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				[...] <u>The height ranges set out in Table 1 are indicative and should not be treated as fixed limits. Proposals which exceed these parameters may be acceptable where it can be demonstrated, through a design-led approach, that the resulting scheme optimises site capacity and responds positively to its context.</u> [...]	
MM17	D4 Tall buildings	MMC-E-195	Berkeley Group	Object to the wording requiring “the heights of tall buildings developments should be consistent with the appropriate heights set out in Table 1”. Suggest amending the wording to ensure more flexibility to the design-led assessment of tall buildings. The suggested wording would read as follows: [...] <u>the heights of tall buildings developments should be consistent with be informed by/take account of the appropriate heights set out in Table 1</u> [...]	This wording change is not supported. We do not consider this change to be necessary as the modification was proposed in order to allow a degree of flexibility - as suggested by the GLA and a few developers - whilst reflecting the spatial strategy based on the analysis evidenced in the Tall Building Annex 2024 (EB023) and in the Tall Buildings Topic Paper 2025 (TP004). The proposed modification responds to the action points AP5 (ED017a), AP13 (ED019) and AP27 (ED024) suggested by the Inspector during the Weeks 1, 2 and 3 of the hearing sessions. This ensures the Plan is justified and is in line with London Plan Policy D9 requirements, London Plan Policy D3, Characterisation and Growth Strategy London Plan Guidance (2023) and Tall Building Annex 2024 (EB023). The Council is satisfied that the plan remains sound without the proposed changes.
MM17	D4 Tall buildings	MMC-E-217	London Legacy Development Corporation	Main modification supported.	Support noted.
MM17	D4 Tall buildings	MMC-E-034	Unite Students	Main modification supported.	Support noted.
MM17	D4 Tall buildings	MMC-E-191	University College London	Main modifications supported.	Support noted.
MM17	D4 Tall buildings	MMC-E-191	University College London	Support the inclusion of the spatial strategy and the idea of consolidating clusters of tall buildings into TBZ13, TBZ15 and TBZ19 as highlighted in Part 2(a) of Policy D4.	Support noted.
MM17	D4 Tall buildings; N7.SA1 Abbey Mills	MMC-E-023	Anjuman-e-Islahul-Muslimeen of (London) UK	Welcome the removal of 'only' and the flexibility afforded to tall buildings outside tall building zones. Welcome the addition of TBZ16 Abbey Mills at part 2.d of the spatial hierarchy of the policy.	Support noted.
MM18	D4 Tall buildings		71 signatories	Object to the TBZ2: Green Street designation. Suggest removal of the TBZ2: Green Street designation.	This wording change is not supported. We do not consider this change to be necessary as the modification was proposed in order to allow a degree of flexibility - as suggested by the GLA and a few developers – whilst reflecting the spatial strategy based on the analysis evidenced in the Tall Building Annex 2024 (EB023) and in the Tall Buildings Topic Paper 2025 (TP004). The proposed modification responds to action points AP5 (ED017a), AP13 (ED019) and AP27 (ED024) suggested by the Inspector during the Weeks 1, 2 and 3 of the hearing sessions. This ensures the Plan is justified and is in line with London Plan Policy D9

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					requirements, London Plan Policy D3, Characterisation and Growth Strategy London Plan Guidance (2023) and Tall Building Annex (EB023). As discussed during the hearing sessions and as evidenced by the Tall Building Annex (EB023), TBZ3: Green Street is considered a suitable location for tall building developments due to its town centre location and its high level of accessibility. The area would also meet the criteria for tall buildings outside tall building zones if the Inspector decides to remove the TBZ3: Green Street designation. The Council is satisfied that the plan remains sound without the proposed changes.
MM18	D4 Tall buildings	MMC-E-222	Ballymore Group	Support in principle the Main Modifications to Policy D4. Object to the tall building strategy which relies on prescriptive height parameters and argue that this could undermine the design-led approach required by London Plan Policy D9.	Comment noted.
MM18	D4 Tall buildings	MMC-E-222	Ballymore Group	Object to the use of specific height parameters in Table 1. While the policy now refers to “appropriate heights”, the representor considers that the detailed height ranges for each Tall Building Zone are likely to be applied in practice as maximum thresholds. They argue that this could undermine the intended flexibility of Policy D4 and is not fully justified in Opportunity Areas and areas with high levels of accessibility. Suggest removing references to maximum heights from Table 1 or alternatively stating that the height parameters are guidance only and should not be treated as fixed ceilings.	This wording change is not supported. We do not consider this change to be necessary as the modification was proposed in order to allow a degree of flexibility whilst reflecting the spatial strategy based on the analysis evidenced in the Tall Building Annex 2024 (EB023) and in the Tall Buildings Topic Paper (TP004). The proposed modification responds to the action points AP5 (ED017a) and AP13 (ED019) suggested by the Inspector during Week 1 and Week 2 hearing sessions. This ensures the Plan is justified and is in line with London Plan Policy D9 which requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the appropriate heights that could be acceptable in these locations. The Council considers the policy to be positively prepared as evidenced in the Tall Building Annex 2024 (EB023) and in the Tall Buildings Topic Paper 2025 (TP004). The Council is satisfied that the plan remains sound without the proposed changes.
MM18	D4 Tall buildings; N2.SA3 Connaught Riverside	MMC-E-222	Ballymore Group	Object to the indication of appropriate heights of up to approximately 50m for the N2.SA3 Connaught Riverside site. The representor considers that this does not fully reflect the site's capacity for optimisation, its role within the wider Opportunity Area, or the surrounding emerging and consented development context. Note that the majority of N2.SA3 Connaught Riverside has recently secured a resolution to grant planning permission for a development featuring buildings of up to 18 storeys in height. Suggest increasing the appropriate height parameters for the site to align with the recently consented scheme and provide greater flexibility in height, subject to design-led justification.	This wording change is not supported. We do not consider this change to be necessary as the modification was proposed in order to allow a degree of flexibility - as suggested by the GLA and a few developers – and reflect that tall buildings have been permitted in the tall building zones with a greater height parameter, whilst reflecting the spatial strategy based on the analysis evidenced in the Tall Building Annex 2024 (EB023) and in the Tall Buildings Topic Paper 2025 (TP004). The proposed modification responds to the action points AP5 (ED017a) and AP13 (ED019) suggested by the Inspector during Week 1 and Week 2 hearing sessions. This ensures the Plan is justified and is in line with London Plan Policy D9 requirements, London Plan Policy D3, Characterisation and Growth Strategy London Plan Guidance (2023) and Tall Building Annex 2024 (EB023). The Council's position on heights at Connaught Riverside is set out in Regulation 19 Consultation Report: Design Comments.

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
					The Council is satisfied that the plan remains sound without the proposed changes.
MM18	D4 Tall buildings; N2.SA2 Lyle Park West	MMC-E-222	Ballymore Group	Welcome the increase in the height parameters from 40m (13 storeys) to 60m (20 storeys) of TBZ11: Lyle Park West. However, the representor considers that the revised height range remains overly restrictive. They argue that the proposed height does not fully reflect the site's location within an Opportunity Area, its riverside setting, and emerging development patterns across the wider Royal Docks area. Suggest introducing additional flexibility to allow taller development where this can be justified through a design-led approach. They proposes the following wording: <u>Heights above this range may be appropriate where justified through a design-led approach</u> [...]	This wording change is not supported. We do not consider this change to be necessary as the modification was proposed in order to allow a degree of flexibility - as suggested by the GLA and a few developers – and reflect that tall buildings have been permitted in the tall building zones with a greater height parameter, whilst reflecting the spatial strategy based on the analysis evidenced in the Tall Building Annex 2024 (EB023) and in the Tall Buildings Topic Paper 2025 (TP004). The proposed modification responds to the action points AP5 (ED017a), AP13 (ED019) and AP14 (ED019) suggested by the Inspector during Week 1 and Week 2 hearing sessions. This ensures the Plan is justified and is in line with London Plan Policy D9 requirements, London Plan Policy D3, Characterisation and Growth Strategy London Plan Guidance (2023) and Tall Building Annex 2024 (EB023). The Council is satisfied that the plan remains sound without the proposed changes.
MM18	D4 Tall buildings	MMC-E-222	Ballymore Group	Welcome the Main Modifications relating to N4.SA4 Limmo site allocation in part. In particular, it supports the introduction of taller building elements of up to approximately 100m in defined areas. It considers that this responds positively to concerns raised in previous representations under Matters 3 and 4 regarding the need to optimise this highly accessible Opportunity Area site. Object to taller buildings being limited to specific areas and subject to a defined step-down hierarchy. It argues that this could constrain the optimisation of the site and only partially addresses concerns raised in earlier representations. Suggest a more flexible approach across the allocation as a whole. It considers that development capacity, building heights and the configuration of development should be determined through a comprehensive, design-led masterplanning process. This should be informed by site constraints and delivery considerations, rather than being constrained by tightly defined height zones.	This wording change is not supported. We do not consider this change to be necessary as the modification was proposed in order to allow a degree of flexibility - as suggested by the GLA and a few developers – whilst reflecting the spatial strategy based on the analysis evidenced in the Tall Building Annex 2024 (EB023) and in the Tall Buildings Topic Paper 2025 (TP004). The proposed modification responds to the action points AP5 (ED017a), AP13 (ED019) and AP14 (ED019) suggested by the Inspector during Week 1 and Week 2 hearing sessions. Examination document ED019 sets out the justification for limiting the 100m zone. This ensures the Plan is justified and is in line with London Plan Policy D9 requirements, London Plan Policy D3, Characterisation and Growth Strategy London Plan Guidance (2023) and Tall Building Annex 2024 (EB023). The Council is satisfied that the plan remains sound without the proposed changes.
MM18	D4 Tall buildings	MMC-E-195	Berkeley Group	Support the use of terms such as "generally between" and "approximately" when referring to appropriate height parameters. However, suggest the policy should clarify that the heights are indicative only to ensure the appropriate heights are not applied as inflexible height cap.	This wording change is not supported. We do not consider this change to be necessary as the modification was proposed in order to allow a degree of flexibility - as suggested by the GLA and a few developers - whilst reflecting the spatial strategy based on the analysis evidenced in the Tall Building Annex 2024 (EB023) and in the Tall Buildings Topic Paper 2025 (TP004). The proposed modification responds to the action points AP5 (ED017a), AP13 (ED019) and AP27 (ED024) suggested by the Inspector during the Weeks 1, 2 and 3 of the hearing sessions. This ensures the Plan is justified and is in line with London Plan Policy D9 requirements, London Plan Policy D3, Characterisation and Growth Strategy London Plan Guidance (2023) and Tall Building Annex 2024 (EB023).

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
					The Council is satisfied that the plan remains sound without the proposed changes.
MM18	D4 Tall buildings; N2.SA2 Lyle Park West	MMC-E-008	Hagley Ltd	Object to the retention of the existing prevailing height parameters. [This concern is fully summarised under MM110 for N2.SA2 Lyle Park West.] Note the inconsistency between the proposed modifications MM110 and MM18 further guidance where a restriction of 40m (ca. 13 storeys) for tall building elements has been retained. Suggest increasing the appropriate height of TBZ11: Lyle Park in Table 1 to ensure consistency, as follows: [...] Opportunity to include tall building elements <u>of approximately up to 40m</u> (ca. 13 storeys) 60m (ca. 20 storeys).	Error is noted. The Council suggests the text is modified as follows: [...] Opportunity to include tall building elements of approximately up to 40m 60m (ca. 13 20 storeys) in proximity to the riverside and to mark the new Neighbourhood Parade at West Silvertown DLR. A response to the objection to prevailing height parameters remaining unchanged is provided under MM110 N2.SA2 Lyle Park West.
MM18	D4 Tall buildings; N2.SA5 Excel Western Entrance	MMC-C-102	International Exhibition Centre Plc (Excel) and designed in partnership with Mount Anvil	Supports the overall approach in the N2.SA5 Excel Western Entrance site allocation of reinforcing the existing street hierarchy and active frontages, locating lower building heights near designated heritage assets, and increasing height towards the western part of the site. Object to the building heights set out in Table 1 for TBZ21: Excel West as too restrictive and not fully reflecting the site's capacity, which - based on a feasibility study from HTA - is considered to be able to accommodate greater height without causing unacceptable heritage or townscape impacts. Note that taller buildings would better respond to the surrounding townscape, support the site's role as a gateway location, and make more effective use of its proximity to Custom House station and the Elizabeth line. Note that existing buildings along Western Gateway already include shoulder heights of between 7 and 13 storeys and taller buildings reaching up to 22 storeys. They therefore consider the proposed maximum height of approximately 13 storeys to be inconsistent with the existing townscape context. Suggests increasing the proposed building height parameters within the site allocation to reflect the site's context, accessibility and development potential. They propose the following amendments: Prevailing heights should generally be between 21-32m (ca. 7-10 storeys) 21-40m (ca. 13 storeys). Opportunity to include a tall building element <u>of approximately up</u>	This wording change is not supported. We do not consider this change to be necessary as the modification was proposed in order to allow a degree of flexibility - as suggested by the GLA and a few developers – whilst reflecting the spatial strategy based on the analysis evidenced in the Tall Building Annex 2024 (EB023) and in the Tall Buildings Topic Paper 2025 (TP001). The proposed modification responds to the action points AP5 (ED017a) and AP13 (ED019) suggested by the Inspector during Week 1 and Week 2 hearing sessions. As discussed at the hearings and as evidenced in the Tall Building Annex 2024 (EB023), due to its low level of accessibility and proximity to heritage assets, the site is not considered suitable for greater height parameters. The wording change for the prevailing heights is not supported. Section 3 'prevailing height parameter' of the Tall Buildings Topic Paper 2025 (TP001) is relevant to expand on how the introduction of complementary 'prevailing heights' can support the sustainable integration of tall building developments with the generally low rise to mid-rise character of the borough. It also explains the rationale beyond the two prevailing heights identified in the borough. This ensures the Plan is positively prepared following a consistent approach and justified as evidenced by the Tall Building Annex 2024 (EB023) . The Council is satisfied that the plan remains sound without the proposed changes.

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
				to 40m (ca. 13 storeys) 60m (ca. 18 storeys) to the west of the site.	
MM18	D4 Tall buildings	MMC-E-173	L&Q	Support the increase to the appropriate height and storey parameters in TBZ11:Lyle Park West. Note an inconsistency between the proposed modifications to the appropriate height and the retained 40m (ca. 13 storeys) for tall building elements in the further guidance column of Table 1. Suggest increasing the appropriate height and prevailing height of TBZ11: Lyle Park in Table 1 to ensure consistency, as follows: - Prevailing heights should generally be between 21m and 32m 32m and 45m (ca. 7-10-15 storeys). - Opportunity to include tall building elements of approximately up to 40m 60m (ca. 13 20 storeys) in proximity to the riverside and to mark the new Neighbourhood Parade at West Silvertown DLR.	Error is noted. The Council suggests the text is modified as follows: [.] Opportunity to include tall building elements of approximately up to 40m 60m (ca. 1320 storeys) in proximity to the riverside and to mark the new Neighbourhood Parade at West Silvertown DLR. [...] However, the wording change for the prevailing heights is not supported. Section 3 'prevailing height parameter' of the Tall Buildings Topic Paper 2025 (TP004) is relevant to expand on how the introduction of complementary 'prevailing heights' can support the sustainable integration of tall building developments with the generally low rise to mid-rise character of the borough. It also explains the rationale beyond the two prevailing heights identified in the borough. The Council is satisfied that the plan remains sound without the proposed changes to the prevailing height parameters.
MM18	D4 Tall buildings	MMC-E-181	LAMIT c/ CCLA Investment Management Ltd	Main modification supported.	Support noted.
MM18	D4 Tall buildings	MMC-EC-183	London International Exhibition Centre Plc (ExCeL) and Mount Anvil	Welcome the general approach in the N2.SA5 Excel Western Entrance site allocation. In particular, it supports reinforcing the existing street hierarchy and active frontages, locating lower building massing near designated heritage assets, and increasing building heights towards the western part of the site. It considers this approach to be sound. Object to the height parameters set out in Table 1 for TBZ21: Excel West as they do not fully reflect the site's development capacity. Note that, from a heritage and townscape perspective, additional height could be accommodated within the site without harming its context. It also considers that the site's strategic accessibility, gateway role and proximity to Custom House and the Elizabeth Line station support the case for a taller building. The respondent states that a taller building could act as a landmark, optimise use of the site, and positively contribute to the setting of nearby heritage assets. Suggest increasing the prescribed height as follows: - Prevailing heights should generally be between 21-32m (ca. 7-10 storeys) 21-40m (ca. 13 storeys). - Opportunity to include a tall building element of approximately	This wording change is not supported. We do not consider this change to be necessary as the modification was proposed in order to allow a degree of flexibility - as suggested by the GLA and a few developers – whilst reflecting the spatial strategy based on the analysis evidenced in the Tall Building Annex 2024 (EB023) and in the Tall Buildings Topic Paper 2025 (TP001). The proposed modification responds to the action points AP5 (ED017a) and AP13 (ED019) suggested by the Inspector during Week 1 and Week 2 hearing sessions. As discussed at the hearings and as evidenced in the Tall Building Annex 2024 (EB023), due to its low level of accessibility and proximity to heritage asset, the site is not considered suitable for greater height parameters. The wording change for the prevailing heights is not supported. Section 3 'prevailing height parameter' of the Tall Buildings Topic Paper 2025 (TP001) is relevant to expand on how the introduction of complementary 'prevailing heights' can support the sustainable integration of tall building developments with the generally low rise to mid-rise character of the borough. It also explains the rationale beyond the two prevailing heights identified in the borough. This ensures the Plan is positively prepared following a consistent approach and justified as evidenced by the Tall Building Annex 2024 (EB023) . The Council is satisfied that the plan remains sound without the proposed changes.

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
				up to 40m (ca. 13 storeys) 60m (ca. 18 storeys) to the west of the site.	
MM18	D4 Tall buildings	MMC-E-217	London Legacy Development Corporation	Main modification supported.	Support noted.
MM18	D4 Tall buildings	MMC-E-033	Thames Water	Object to Policy D4. They consider that the policy and Tall Building Zone designation do not adequately recognise the operational requirements of Beckton Sewage Treatment Works (STW). The representor states that it is unclear whether Beckton STW falls within the part of TBZ5 where buildings may exceed 40m or 50m. They argue that, as drafted, the policy is not justified or effective because it does not provide an appropriate and deliverable strategy for Beckton STW, which is an operational sewage treatment works and a Strategic Industrial Location allocated under Policy J1. Suggest amending Policy D4 or TBZ5 to recognise that operational infrastructure at Beckton STW may need to exceed the prescribed height limits. They suggest either creating a separate tall building designation for Beckton STW or amending TBZ5 to specifically reference the site. Suggest the following wording: [...] <u>Beckton STW may include infrastructure such as flue stacks which for operational purposes exceed 32m or provide clarification that Beckton STW is included in the area where buildings could reach over 40m or 50m.</u> [...]	This wording change is not supported. We do not consider this change to be necessary as the modification was proposed in order to allow a degree of flexibility - as suggested by the GLA and a few developers – whilst reflecting the spatial strategy based on the analysis evidenced in the Tall Building Annex 2024 (EB023) and in the Tall Buildings Topic Paper 2025 (TP004). The proposed modification responds to the action points AP5 (ED017a), AP13 (ED019) and AP14 (ED019) suggested by the Inspector during weeks 1 and 2 hearing sessions. This ensures the Plan is justified and is in line with London Plan Policy D9 requirements, London Plan Policy D3, Characterisation and Growth Strategy London Plan Guidance (2023) and Tall Building Annex 2024 (EB023). The Council's position on heights in Beckton Sewage Treatment Works is set out in the Regulation 19 Consultation Report: Design under Reg19-E033/017 (SD021). The Council is satisfied that the plan remains sound without the proposed changes.
MM18	D4 Tall buildings	MMC-E-034	Unite Students	Main modification supported.	Support noted.
MM18	D4 Tall buildings; N7.SA1 Abbey Mills	MMC-E-023	Anjuman-e-Islahul-Muslimeen of (London) UK	Welcome the removal of 'maximum' heights and its replacement with 'appropriate heights' and the flexibility afforded through the policy wording in Table 1.	Support noted.
MM18	D4 Tall buildings; N7.SA1 Abbey Mills	MMC-E-023	Anjuman-e-Islahul-Muslimeen of (London) UK	Welcome the recognition that appropriate heights within TBZ16 should include buildings up to 100m (ca. 33 storeys). Object to the policy restricting buildings up to 100m to areas around West Ham Station. Consider this approach to be overly prescriptive and argue that it does not take account of the emerging context to the south of the site. They believe this could unnecessarily limit the site's development capacity, contrary to the objectives of the Draft Local Plan and the London Plan. Object to the retention of the 40m appropriate height reference. They consider this height threshold to be unjustified as it has not been informed by a full assessment of the emerging context to the south of the site. They argue that including a second, lower height limit is ambiguous and could restrict site capacity.	This wording change is not supported. We do not consider this change to be necessary as the modification was proposed in order to acknowledge 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 proposed modification responds to the action point AP14 (ED019) suggested by the Inspector during the Week 2 hearing session. The Council considers the limitation of a 100m zone and the retaining of the 40m zone is justified and consistent with the spatial strategy approach which includes lower height parameters in proximity to the sensitive areas of the Borough. The Regulation 18 Consultation Report: Design Comments (SD037) and the Regulation 19 Consultation Report: Design Comments (SD021) evidence the balanced approach the Council took to respond to concerns raised by Lee Valley Regional Park Authority regarding the impact of tall buildings on heritage assets.

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
				Object to the proposed prevailing height range of 21m–32m and 40m, stating that it could create an uncomfortable transition between buildings across the site and limit development capacity. Object to the policy requirement for a careful transition to the conservation area. They state that the Council has not undertaken sufficient site-specific testing to demonstrate at what heights or in which locations development would harm the significance of the conservation area. They also argue that the policy does not identify which aspects of the conservation area's significance would be preserved through such a transition. For these reasons, they consider this part of the policy to be unjustified.	This ensures the Plan is justified and is in line with London Plan Policy D9 requirements, London Plan Policy D3, Characterisation and Growth Strategy London Plan Guidance (2023) and Tall Building Annex (EB023). The Council is satisfied that the plan remains sound without the proposed changes.
MM18	D4 Tall buildings	MMC-E-238	Environment Agency	Support the main modifications and welcome the inclusion of water spaces for relevant tall building zones listed in table 1 and the guidance to carefully avoid/minimise overshadowing of these water spaces.	Support noted.
MM18	D4 Tall buildings	MMC-E-236	Friends of Queen's Market	Object to the modifications to Table 1 Tall Building Zones that introduce the words “generally” and “approximately” to the height parameters. Note that the proposed wording changes introduce greater flexibility into the height parameters and may enable increases in the number of storeys delivered within Tall Building Zones, therefore reducing the need for as proposed tall building zone on Queen's Market. Suggest the de-designation of TBZ2: Green Street.	This wording change is not supported. We do not consider this change to be necessary as the modification was proposed in order to allow a degree of flexibility - as suggested by the GLA and a few developers – whilst reflecting the spatial strategy based on the analysis evidenced in the Tall Building Annex 2024 (EB023) and in the Tall Buildings Topic Paper 2025 (TP004). The proposed modification responds to action points AP5 (ED017a), AP13 (ED019) and AP27 (ED024) suggested by the Inspector during the Weeks 1, 2 and 3 of the hearing sessions. This ensures the Plan is justified and is in line with London Plan Policy D9 requirements, London Plan Policy D3, Characterisation and Growth Strategy London Plan Guidance (2023) and Tall Building Annex (EB023). As discussed during the hearing sessions and as evidenced by the Tall Building Annex (EB023), the TBZ3: Green Street is considered a suitable location for tall building developments due to its town centre location and its high level of accessibility. The area would also meet the criteria for tall buildings outside tall building zones if the Inspector decides to remove the TBZ3: Green Street designation. The Council is satisfied that the plan remains sound without the proposed changes.
MM18	D4 Tall buildings	MMC-E-191	University College London	Main modifications supported.	Support noted.
MM19	D4 Tall buildings	MMC-P-001	71 signatories	Suggest removal of part 5 of Policy D4 to ensure Queen's Market's function is protected from redevelopment and the impact of tall buildings.	This wording change is not supported. We do not consider this change to be necessary as the modification was proposed in order to allow a degree of flexibility - as suggested by the GLA and a few developers – whilst reflecting the spatial strategy based on the analysis evidenced in the Tall Building Annex 2024 (EB023) and in the Tall Buildings Topic Paper 2025 (TP004). The proposed modification responds to action points AP5 (ED017a), AP13 (ED019) and AP27 (ED024) suggested by the Inspector during the Weeks 1, 2 and 3 of the hearing sessions.

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
					This ensures the Plan is justified and is in line with London Plan Policy D9 requirements, London Plan Policy D3, Characterisation and Growth Strategy London Plan Guidance (2023) and Tall Building Annex (EB023). As discussed during the hearing sessions and as evidenced by the Tall Building Annex (EB023), TBZ3: Green Street is considered a suitable location for tall building developments due to its town centre location and its high level of accessibility. The area would also meet the criteria for tall buildings outside tall building zones if the Inspector decides to remove the TBZ3: Green Street designation. The Council is satisfied that the plan remains sound without the proposed changes.
MM19	D4 Tall buildings	MMC-E-222	Ballymore Group	Main modification supported.	Support noted.
MM19	D4 Tall buildings	MMC-E-195	Berkeley Group	Support in principle Part 5 of the policy and the flexibility afforded to tall building developments outside Tall Building Zones if they meet Part 3 and Part 4 of the Policy. Object to criterion (a) which introduces an unjustified restriction - tall building developments must be “located in an area with a high level of public transport accessibility (PTAL 4–6) within a local or town centre, or in an Opportunity Area” - and could prevent the optimisation of sites. The representor consider that this approach is more restrictive than London Plan Policy H1, which supports optimisation of sites within 800 metres of town centres and stations, including areas with PTAL 3-6. They also consider that London Plan Policy D9 does not specifically require tall buildings outside identified zones to be limited by a standalone locational test based on high PTAL, town centre location or Opportunity Area status. Note the Master Brewer Case which confirms that Parts A and B of London Plan Policy D9 are not preconditions for applying Part C. Suggest using London Plan Policy H1 criteria for Part 5 (a) of the policy or alternatively remove the locational restriction considering that the remaining criteria in MM19 already provide a robust framework for assessment by requiring proposals to avoid harm to landmarks, views and protected vistas, contribute positively to townscape legibility and tall building clusters, and deliver public realm benefits.	This wording change is not supported. We do not consider this change to be necessary as the modification was proposed in order to allow a degree of flexibility outside tall building zones - as suggested by few developers - where the criteria in policy D4.5 are met. The proposed modification responds to action points AP5 (ED017a) and AP27 (ED024) suggested by the Inspector during the Week 1 and Week 3 of the hearing sessions. These action points required the Council to set out the circumstances in which tall buildings may be acceptable outside the identified areas, in line with the Borough's spatial strategy. A high level of accessibility is considered a fundamental criterion to support growth with tall building developments. This ensures the Plan is justified and is in line with London Plan Policy D9 requirements, London Plan Policy D3, Characterisation and Growth Strategy London Plan Guidance (2023) and Tall Building Annex (EB023). As discussed extensively during the hearing sessions, the Council's tall building strategy and spatial hierarchy are based on a design-led approach, evidenced in the Tall Building Annex (EB023). The evidence considers areas with high level of accessibility suitable to support greater heights. While London Plan Policy H1 supports site optimisation within 800 metres of a town centre boundaries and station, including sites with PTAL 3 to 6, it does not imply that tall buildings are the most appropriate form of development to achieve optimisation. The Council's position on this matter is set out in the Tall Buildings Topic Paper (TP001). The Council is satisfied that the plan remains sound without the proposed changes.
MM19	D4 Tall buildings	MMC-E-217	London Legacy Development Corporation	Main modification supported.	Support noted.
MM19	D4 Tall buildings	MMC-E-034	Unite Students	Main modification supported.	Support noted.

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
MM19; AM33	D4 Tall buildings	MMC-E-236	Friends of Queen's Market	Object to the introduction of Policy D4.5 which would enable tall buildings to be developed outside designated Tall Building Zones across Newham, including at Queen's Market, TBZ2:Green Street, if it is de-designated. Note the Council's original intention was to restrict and control the location and height of tall buildings. It considers that extending opportunities for tall buildings beyond designated zones is unjustified given the negative functional, visual and environmental impacts associated with this form of development as highlighted with the introduction of the word 'minimise' overshadowing in additional modification AM33.	This wording change is not supported. We do not consider this change to be necessary as the modification was proposed in order to allow a degree of flexibility outside tall building zones - as suggested by few developers - where the criteria in policy D4.5 are met. The proposed modification responds to action points AP5 (ED017a) and AP27 (ED024) suggested by the Inspector during the Week 1 and Week 3 hearing sessions. This ensures the Plan is justified and is in line with London Plan Policy D9 requirements, London Plan Policy D3, Characterisation and Growth Strategy London Plan Guidance (2023) and Tall Building Annex (EB023). As discussed during the hearing sessions and as evidenced by the Tall Building Annex (ED023), TBZ3: Green Street is considered a suitable location for tall building developments due to its town centre location and its high level of accessibility. The area would also meet the criteria for tall buildings outside tall building zones if the Inspector decides to remove the TBZ3: Green Street designation. The Council is satisfied that the plan remains sound without the proposed changes.
MM20; PM5	D4 Tall buildings; N7.SA1 Abbey Mills	MMC-E-023	Anjuman-e-Islahul-Muslimeen of (London) UK	Support the changes to TBZ16: Abbey Mills, including the corresponding amendments shown on the Proposed Changes to the Local Plan Policies Map (ED031). Object to limiting the additional 100m zone to a small part of the site and considers this approach to be overly prescriptive. They argue that any future masterplan would be prepared through a design-led approach and therefore does not require such a restrictive boundary.	This wording change is not supported. We do not consider this change to be necessary as the modification was proposed in order to acknowledge the emerging context in the N7.SA2 Twelvetreets 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 proposed modification responds to the action point AP14 (ED019) suggested by the Inspector during the Week 2 hearing session. The Council considers the limitation of a 100m zone and the retaining of the 40m zone is justified and consistent with the spatial strategy approach which includes lower height parameters in proximity to the sensitive areas of the Borough. The Regulation 18 Consultation Report: Design Comments (SD037) and the Regulation 19 Consultation Report: Design Comments (SD021) evidence the balanced approach the Council took to respond to concerns raised by Lee Valley Regional Park Authority regarding the impact of tall buildings on heritage assets. This ensures the Plan is justified and is in line with London Plan Policy D9 requirements, London Plan Policy D3, Characterisation and Growth Strategy London Plan Guidance (2023) and Tall Building Annex (EB023). The Council is satisfied that the plan remains sound without the proposed changes.
MM20	D4 Tall buildings	MMC-E-217	London Legacy Development Corporation	Main modification supported.	Support noted.
MM21	D4 Tall buildings	MMC-E-023	Anjuman-e-Islahul-Muslimeen of (London) UK	Welcome the recognition of 'transform' areas, stating that this reflects the significance of the Three Mills (N7) Neighbourhood Area and its ability to accommodate growth within the Borough. Welcome the recognition that existing and emerging building	Support noted.

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
				heights play an important role in supporting a design-led approach to development. Support the application of placemaking principles that reinforce town and local centres as the heart of their neighbourhoods.	
MM21	D4 Tall buildings	MMC-E-236	Friends of Queen's Market	Object to the new justification text supporting Policy D4. It considers the wording is unclear because the phrase “their status as ‘transform’ areas of the borough” could be interpreted as meaning that all 22 Tall Building Zones are transform areas. The respondent argues that it is not justified or appropriate for Queen’s Market to be identified as a transform area and considers that this approach does not adequately recognise the market’s role. Object to the statement that Tall Building Zones are based on an informed assessment exercise. It argues that the assessment, scoping and screening undertaken for Queen’s Market were inconsistent and lacked sufficient justification. The representor considers that prevailing building heights and public transport accessibility were overstated and that the case for a 50m building on the site has not been adequately demonstrated. The representor further argues that growth and density increases should not be dependent on tall buildings and that the assessment does not consider whether tall buildings can deliver the social and genuinely affordable housing needed in the borough. Suggest the justification text should be amended to provide greater clarity on the meaning of “transform areas” and to better justify the designation of Queen’s Market within the tall building strategy.	This wording change is not supported. We do not consider this change to be necessary as the modification was proposed in order to set out the tall building strategy and spatial hierarchy, based on the existing evidence and analysis in the Tall Buildings Annex (EB023). The propose modification responds to AP13 (ED019) suggested by the Inspector during the Week 2 hearing session. This ensures the Plan is justified and is in line with Tall Building Annex (EB023). The Council is satisfied that the plan remains sound without the proposed changes.
MM23	D6 Neighbourliness	MMC-C-097	Centro Planning Consultancy	Modification supported.	Support noted.
MM23	D6 Neighbourliness	MMC-C-097	Centro Planning Consultancy	Suggest a change to Policy D6.1 to reflect the change introduced to D6.2 implementation with the Main Modification MM23, which recognises the interrelationship between new and existing land uses. Note that this amendment would improve internal consistency within the Plan, make this policy more effective and consistent with National Policy, and support the delivery of the agent of change principles embedded within MM23.	This wording change is not supported. We do not consider any further modifications to the Plan to be necessary. Policy D6 Part 2 protects designated and non-designated employment locations through the agent of change approach, clarifying that in the planning balance, retention of employment floorspace is a strategic priority. MM23 to the implementation text of policy D6.2 was necessary in order to ensure that employment sites can reasonably intensify within the margins allowed for their lawful operation, and that the spatial strategy for intensification on SILs and LILs is safeguarded. The Council considers Policy D6.1 to be consistent with the change introduced to D6.2 implementation text with the Main Modification MM23. Policy cannot apply retrospectively to existing uses. The wording 'all development', which includes redevelopment or use intensification scenarios, is clear and sufficiently captures opportunities for existing employment land to be re-designed to reasonably mitigate its amenity impacts. The Council is satisfied that the plan remains sound without the proposed changes.

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
MM23	D6 Neighbourliness	MMC-E-033	Thames Water	Object to the Main Modification MM23 which doesn't reflect comments submitted at the Regulation 19 stage. Thames Water considers the modified text to be unclear and ambiguous. Suggest that the policy is amended to make clear that the developer of the vulnerable use is responsible for undertaking "The assessments and mitigations to reflect a reasonable worst-case scenario for the base line amenity impacts..." and for implementing the required mitigation measures before the development is occupied.	This wording change is not supported. We do not consider this change to be necessary as the modification was proposed in order to protect employment land. The Council considers the modification is clear that the developer of the vulnerable use will be responsible of undertaking assessment and implementing the required mitigation prior to occupation. This ensures the Plan is positively prepared and effective. The Council's position on this matter is set out in Regulation 19 Consultation Report: Design Comments. The Council is satisfied that the plan remains sound without the proposed changes.
Additional Modifications					
AM32	D4 Tall buildings	MMC-E-023	Anjuman-e-Islahul-Muslimeen of (London) UK	Welcome the removal of 'maximum permissible' heights (replaced with 'appropriate height'.	Support noted.
AM32	D4 Tall buildings	MMC-E-195	Berkeley Group	Object to the wording of AM32. The respondent considers that the phrase "unless they meet the criteria" is too restrictive and risks treating Policy D4 Part 5 as a gateway test rather than a set of criteria to be considered through balanced planning judgement. The respondent argues that this issue would be particularly significant if Policy D4 Part 5(A) is retained, as it could prevent otherwise acceptable tall building proposals from being assessed on their merits through a detailed design-led assessment. Suggest amending AM32 to clarify that proposals for tall buildings outside Tall Building Zones should be assessed against Policy D4 Part 5 and London Plan Policy D9, rather than being subject to a gateway test. The respondent considers that this would maintain an appropriate planning balance and avoid conflating local policy requirements with London Plan Policy D9. The respondent proposes the following wording: Development of tall buildings outside Tall Building Zones will generally be considered a departure from the Plan <u>unless they meet the criteria for tall buildings outside Tall Building Zones identified in part 5 of the policy unless it can be robustly demonstrated that they are an otherwise suitable tall building location when assessed against Policy D4, Part 5 and London Plan Policy D9.</u>	This wording change is not supported. We do not consider this change to be necessary as the modification was proposed in order to allow a degree of flexibility outside tall building zones - as suggested by few developers - where the criteria in policy D4.5 are met. The proposed modification responds to action points AP5 (ED017a) and AP27 (ED024) suggested by the Inspector during the Weeks 1 and 3 of the hearing sessions. These action points required the Council to set out the circumstances in which tall buildings may be acceptable outside the identified areas, in line with the Borough's spatial strategy. An high level of accessibility is considered a fundamental criterion to support growth with tall building developments. This ensures the Plan is justified and is in line with London Plan Policy D9 requirements, London Plan Policy D3, Characterisation and Growth Strategy London Plan Guidance (2023) and Tall Building Annex (EB023). As discussed extensively during the hearing sessions, the Council's tall building strategy and spatial hierarchy are based on a design-led approach, evidenced in the Tall Building Annex (EB023). The evidence considers areas with high level of accessibility suitable to support greater heights. While London Plan Policy H1 supports site optimisation within 800 metres of a town centre boundaries and station, including sites with PTAL 3 to 6, it does not imply that tall buildings are the most appropriate form of development to achieve optimisation. The Council's position on this matter is set out in the Tall Buildings Topic Paper (TP001). The Council is satisfied that the plan remains sound without the proposed changes.
Comments not specific to Main Modifications					
N/A	D2 Public Realm Net Gain	MMC-E-034	Unite Students	Support the principle of exploring opportunities to create and enhance the public realm surrounding a site.	This comment does not relate to a proposed Main Modification.

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
				Object to Parts 2, 3 and 4 of Policy D2. The representor considers the policy unjustified and inconsistent with the London Plan because it introduces a requirement to provide public realm contributions, whereas London Plan Policy D8 only encourages boroughs to explore opportunities where appropriate. Object to the policy's lack of flexibility as some sites may be unable to provide public realm improvements due to site constraints, including railways, highways, safety requirements and security considerations. They also argue that public realm requirements should not compromise the efficient use of land or reduce the delivery of development floorspace. Object to the application of a blanket contribution approach. They argue that viability testing did not assess purpose-built student accommodation (PBSA) schemes and does not sufficiently consider site-specific circumstances. They state that developments already delivering on-site public realm improvements should not also be required to make equivalent off-site contributions. Object to the impact of the policy on PBSA development which faces already higher operational costs, higher CIL rates, affordable room requirements, rising construction costs, Building Safety Regulator delays, increased finance costs and risks associated with student intake cycles as factors affecting viability. Object to Part 5 of Policy D2 because consider the requirement for a Public Realm Management Plan for all relevant applications to be unjustified and ineffective. They state that the requirement goes beyond London Plan Policy D8, would add unnecessary documentation to planning applications, could slow down decision-making, and may require information that is not available at application stage due to third-party involvement. Suggest a Main Modification to Part 2, 3 and 4 of Policy D2: 2. All new-build developments and developments for a change of use that are either on sites with a street-facing boundary of at least 25m, or that are major residential developments, should <u>explore opportunities to create new public realm and contribute towards the enhancement and maintenance of existing public realm where appropriate.</u> make positive qualitative contributions to the public realm through the following <u>This may include:</u> [...] 3. All major developments referable to the Mayor of London are required to make a proportionate contribution towards public realm enhancement and maintenance beyond the site, as informed by an Active Travel Zone Assessment (TfL). 4. Non-referable major developments and minor residential	The Council's position on this matter is set out in Matter 10 Response (EWS045).

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
				developments of five or more gross new build units are also encouraged to make improvements to the wider public realm network within their neighbourhood. Suggest a Main Modification to Part 5 of Policy D2: 5. A Public Realm Management Plan should be <u>secured via condition where required for</u> submitted for all applications providing qualitative and quantitative public realm net gains on privately owned land. This will be implemented through legal agreement for major developments. <u>Where appropriate,</u> the management plan should address: [...]	
N/A	D4 Tall buildings	MMC-C-095	Abid Ali	Object to tall building developments and the impact on overcrowding, antisocial behaviour and undesirable high-rise residential environments.	This comment does not relate to a proposed Main Modification. Comment noted.
N/A	D9 Designated and non-designated heritage assets	MMC-EC-290	David Barton	Supports the use of traditional architecture design codes. They consider that these should be a central component of the Local Plan and applied across all chapters and policies, particularly for new development. The respondent also supports placemaking and greening proposals and considers that traditional architecture can deliver economic, environmental and ecological benefits. Object to the demolition of historic buildings. They argue that buildings constructed before 1950 should be protected from demolition. The respondent also objects to the demolition of non-designated heritage assets and other historic buildings that do not have formal heritage status. They express concern that the sale of publicly owned historic buildings could result in their loss through demolition. Suggest that traditional architecture design codes should be embedded throughout the Local Plan and applied to new development. They suggest introducing a ban on the demolition of buildings constructed before 1950. They recommend that reconstructions of previously demolished historic buildings, whether listed or unlisted, should be fully supported for restoration and reuse. The respondent suggests that non-designated heritage assets and other historic buildings should receive greater protection from demolition. They also recommend that historic buildings should be authentically reconstructed to their original form. Note the representation refers to an accompanying umbrella representation, which they state provides further evidence to support their comments.	This comment does not relate to a proposed Main Modification. It is not considered that further guidance on the implementation of this policy is required. The Council will keep this under review.

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
				The respondent considers that a greater focus on traditional architecture would help address housing needs, reduce environmental impacts, support biodiversity, benefit residents, businesses and developers, and strengthen Newham's local character and economic resilience.	
N/A	D9 Designated and non-designated heritage assets	MMC-EC-290	David Barton	Support the use of traditional architecture design codes and considers that they should be a central element of the Local Plan and its policies, particularly for new development. They consider that traditional architecture performs well in economic, environmental and ecological terms and can help deliver successful placemaking. They also support proposals relating to greenery and the restoration and reuse of historic buildings. Object to the demolition of historic buildings. They argue that buildings constructed before 1950 should be protected from demolition and that stronger protection should be given to non-designated heritage assets and other historic buildings that are not formally designated. They also object to the disposal of publicly owned historic buildings where this could result in their demolition. Suggest that traditional architecture design codes should be embedded throughout the Local Plan and applied across all relevant chapters and policies. Suggests introducing a ban on the demolition of buildings constructed before 1950. They suggest that reconstructions of previously demolished historic buildings should be fully supported, regardless of whether the buildings were listed. They also suggest that non-designated heritage assets and other historic buildings should receive greater protection from demolition. The respondent recommends that historic buildings should be authentically reconstructed to their original appearance. Note The respondent refers to an accompanying representation document which they state provides further evidence and justification for their proposals. The respondent considers that a greater focus on traditional architecture would help address housing needs, reduce environmental impacts, support biodiversity, benefit existing and future residents and businesses, and strengthen Newham's economic competitiveness and local identity.	This comment does not relate to a proposed Main Modification. It is not considered that further guidance on the implementation of this policy is required. The Council will keep this under review.
N/A	D9 Designated and non-designated heritage assets	MMC-E-289	Jenny Duval	Suggest the inclusion of the Blakesley Arms pub, 53 Station Road, Manor Park, E12 5BP, as heritage asset in the modified Local Plan, due to its historic and architectural significance, its prominent location next to Manor Park Station, and its position at the entrance to the Durham Road Conservation Area.	This comment does not relate to a proposed Main Modification. The listing of buildings is not undertaken through the Local Plan process. The Council does review its Local List and opportunities to contribute to this process will be communicated when this is next undertaken.

4. High Streets

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
Main Modifications					
MM30	HS4 Markets and Events/Pop-Up Spaces	MMC-E-236	Friends of Queen's Market	Welcome the revised markets policy, including the need for Social Value Health Impact Assessment.	Support noted.
MM31	HS4 Markets and Events/Pop-Up Spaces	MMC-E-236	Friends of Queen's Market	Welcome the revised markets policy, including the need for Social Value Health Impact Assessment.	Support noted.
MM33	HS4 Markets and Events/Pop-Up Spaces	MMC-E-236	Friends of Queen's Market	Welcome the revised markets policy, including the need for Social Value Health Impact Assessment.	Support noted.
Comments not specific to Main Modifications					
N/A	HS1 Town Centre Network	MMC-E-222	Ballymore Group	Welcome the recognition of the need for policy flexibility within the town centre network.	Support noted.

5. Social Infrastructure

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
Main Modifications					
MM36	SI1 Existing community facilities and Health facilities	MMC-E-023; N7.SA1 Abbey Mills	Anjuman-e-Islahul-Muslimeen of (London) UK	Modification supported.	Support noted.
MM36	SI1 Existing community facilities and Health facilities	MMC-C-096	NHS Property Services (NHSPS) Limited	Modification supported.	Support noted.
MM37	SI1 Existing community facilities and Health facilities	MMC-C-096	NHS Property Services (NHSPS) Limited	Modification supported.	Support noted.
MM37	SI1 Existing community facilities and Health facilities	MMC-E-294	Sport England	Object to the proposed changes because they remove the requirement to assess local needs and instead focus on the proximity of similar sites or uses. The presence of nearby facilities does not demonstrate that a facility is surplus, as those facilities may already be operating at or above capacity. Consider the changes could result in the sport facilities policies no longer aligning with paragraph 104 of the NPPF. Suggest using the Council's sport facility strategies to assess whether there is a surplus of sports facility provision and local need. Considers the policy wording is confusing because it suggests sports facilities do not fall within the definition of community infrastructure, while modification MM40 requires cultural, sport and recreation facilities to refer back to Policy SI1. They consider this creates inconsistency within the Plan.	This change is not supported. We do not consider a change to MM37 to be necessary, as the modification was proposed to improve the effectiveness and clarity of the policy. Modification MM37 does not alter the policy requirement or definition of social infrastructure as consulted upon at Regulation 19 but provides a clearer signposting for applicants and decision makers. The requirement to assess whether a facility remains necessary to meet current and future needs continues to apply. Under Policy SI3 part 1b.ii., where the requirements of Policy SI1 part 1.a cannot be met (suitable on-site, off-site or alternative local facility), applicants must demonstrate that the existing facility is surplus to current and future needs. The policy therefore retains a clear requirement to consider current and future need before the loss of a social infrastructure facility can be justified. The Council therefore considers MM37 to be consistent with national policy, including paragraph 104 of the NPPF. The Council is satisfied that the plan remains sound without the proposed changes.
MM38	SI2 New and re-provided community facilities and Health facilities	MMC-E-023	Anjuman-e-Islahul-Muslimeen of (London) UK	Object to Policy SI2. Maintains that it is not necessary or justified to reassess need for allocated sites. Consider the Council's Community Facilities Needs Based Assessment (2022) already demonstrates need and that London Plan Policy S1 requires needs assessments to inform plan-making rather than introducing additional site-specific testing at the planning application stage. Consider that requiring a further assessment of need is not consistent with the London Plan and therefore Policy SI2 is not justified. Refers to Community Facilities Needs Based Assessment (2022) (EB044) and London Plan Policy S1, arguing that development proposals which make best use of land, including the public sector	This change is not supported. We do not consider a change to MM38 to be necessary as the modification was proposed to address Action Point AP54 (ED028). The Councils position on this matter is set out in its response to the Week 5 Hearing Action Points (ED029, paragraphs 6.15-6.21). The Council is satisfied that the Plan remains sound without the proposed changes.

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
				estate, should be supported.	
MM38	SI2 New and re-provided community facilities and Health facilities	MMC-E-292	North East London NHS Integrated Care Board	Modification supported.	Support noted.
MM38	SI2 New and re-provided community facilities and Health facilities	MMC-E-292	North East London NHS Integrated Care Board	Modification supported.	Support noted.
MM39	SI2 New and re-provided community facilities and Health facilities	MMC-E-292	North East London NHS Integrated Care Board	Suggest changes to MM39 to provide greater certainty over how healthcare infrastructure will be planned and delivered. Refer to the NPPF and London Plan policies supporting proactive infrastructure planning and collaboration with infrastructure providers. Suggests the following additional wording to the supporting text after SI2: <u>"Health facilities include neighbourhood health centres, integrated primary and community care facilities, diagnostic facilities and other models of health infrastructure that support integrated neighbourhood working. The design and delivery of health facilities should reflect the strategic estate plans of the NHS and evolving models of health and care delivery."</u> This proposed wording would recognise evolving NHS service delivery models and future-proof the policy. Suggests replacing the existing implementation text with: <u>"Applicants should work with tThe relevant health partners in Newham (Barts Health NHS Trust, North East London NHS Foundation Trust, Health and Care Space Newham, HUDU), including NHS NEL ICB, Barts Health NHS Trust, East London NHS Foundation Trust, Health and Care Space Newham and HUDU/NHS Property Services, from the earliest stages of design and masterplanning to determine the location, specification, timing of delivery and appropriate delivery mechanism for health facilities identified through site allocations or otherwise required to support planned growth. The strategic delivery of NHS services is jointly formed from NHS organisations working in Newham, and is summarised within the Joint Forward Plan. Please visit the NHS North East London website for the most up to date NHS strategy and plan information."</u> This proposed wording would strengthen collaboration with NHS partners and provide greater certainty on healthcare delivery. Suggests inserting:	These wording changes are not supported. We do not consider the changes proposed to MM39 to be necessary as the policy and supporting text already provide an effective framework for planning and delivering health infrastructure in collaboration with relevant health partners. The implementation text to Policy SI2 part 2 recognises the importance of engagement with healthcare providers and provides sufficient flexibility to respond to changing models of healthcare provision, service delivery and estate planning over the Plan period. However, we have no objection to updating the implementation text supporting Policy SI2 part 2, to ensure it reflects the full range of NHS partners that should be consulted. The Council considers these amendments to be factual updates and clarifications rather than changes necessary to ensure soundness. The relevant paragraphs could therefore be updated as follows: The Local Plan neighbourhood policies and relevant site allocations set out where future health facilities are required. Applicants are encouraged to consult the relevant health partners in Newham (NHS North East London Integrated Care Board (NHS NEL ICB), Barts Health NHS Trust, North East London NHS Foundation Trust, Health and Care Space Newham, the Healthy Urban Development Unit (HUDU) and NHS Property Services Ltd) early in the development process to understand what type of health facility is needed and when it is required to be operational. Health facilities evidence of consulting the relevant health partners in Newham (NHS North East London Integrated Care Board (NHS NEL ICB), Barts Health NHS Trust, North East London NHS Foundation Trust, Health and Care Space Newham, the Healthy Urban Development Unit (HUDU) and NHS Property Services Ltd). The strategic delivery of NHS services is jointly formed from NHS organisations working in Newham, and is summarised within the Joint Forward Plan. Please visit the NHS North East London website for the most up to date NHS strategy and plan information. The proposed modification to the site allocations does not relate to a proposed Main Modification. The Local Plan should be read as a whole and there is no requirement for individual site allocations to duplicate the strategic policy approach to health infrastructure. Proposals for new health facilities will

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
				<u>"Where development generates a need for new or expanded health infrastructure, the Council will work with NHS partners to secure the timely delivery of health facilities. Where the statutory tests are met, planning obligations may be used to secure land, shell and core accommodation, financial contributions, phased delivery arrangements or other measures necessary to support the provision of health infrastructure."</u> This proposed wording would provide a clear basis for securing health infrastructure through planning obligations where appropriate. Suggest adding the following text to the implementation section relating to site allocations: <u>"Applicants should also work with the relevant NHS organisations to determine the type of health facility required, its location, specification, timing of delivery and appropriate delivery mechanism."</u> This proposed wording would improve the effectiveness of the policy by ensuring health facilities are planned and delivered in collaboration with NHS organisations.	be assessed against Policy SI2, while proposals involving the loss, reduction or relocation of existing health facilities will be required to comply with Policy SI1. The Council is satisfied that the plan remains sound without the proposed changes.
MM39	SI2 New and re-provided community facilities and Health facilities	MMC-E-294	Sport England	Object to MM39. Concerned that the modification does not require decision-makers to use the Council's sport facility evidence base when assessing proposals. The respondent considers this could be contrary to national policy and Sport England's Planning Principles.	We do not consider a change to MM39 to be necessary as the modification was proposed to address Action Points AP53 and AP54 (ED028). The Council does not agree that the MM39 omits reference to the Council's sport facility evidence base or results in a policy framework that is inconsistent with national policy or Sport England's Planning Principles. The Plan contains a clear mechanism requiring applicants and decision-makers to take account of the Council's Built Leisure Needs Assessment (2025).The implementation text supporting Policy SI2 directs applicants to Policy SI3 part 2 in relation to cultural, sport and recreation facilities. The implementation text establishes an explicit expectation that proposals for sport and recreation facilities will be informed by the Council's adopted evidence base. MM39 therefore neither removes nor weakens the requirement to have regard to the Built Leisure Needs Assessment (2025). The Council therefore considers MM39 to be justified, effective and consistent with national policy, including the NPPF's requirement to plan positively for sport and recreation provision. The Council is satisfied that the plan remains sound without any additional changes.
MM40	SI3 Cultural facilities and sport and recreation facilities	MMC-E-294	Sport England	Notes that the proposed changes to Policy SI3 1.b. are unclear .Seeks clarification on how part 1b.i, ii and iii are intended to operate. If the policy allows criteria iii to be met without meeting criterion i or	The Council notes that this representation seeks clarification on the application of Policy SI3(1)(b) following proposed Modification MM40. The Council confirms that criterion 1.b.i applies in all cases and requires applicants to demonstrate that the existing cultural, sport or recreational

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
				ii, it would not be consistent with paragraph 104 of the NPPF. This would make the policy unsound because national policy requires sports facilities to be shown as surplus, replaced, or redeveloped for alternative sports or recreational provision where the benefits outweigh the loss.	facility is surplus to current and future needs. In addition, applicants must satisfy either criterion 1.b.ii, which relates to the outcome of appropriate marketing activity, or criterion 1.b.iii, where the proposal forms part of a recognised public body's estates programme. Criterion 1.b.iii is not intended to operate as a standalone exception to criterion 1.b.i. Modification MM40 does not alter the substantive requirement to demonstrate that a facility is surplus to current and future needs. Accordingly, the policy does not permit the loss of cultural, sport or recreational facilities solely because they form part of an estates programme. The Council therefore considers that Policy SI3 Part 1.b remains consistent with paragraph 104 of the National Planning Policy Framework. However, to provide greater clarity and to avoid any misinterpretation, the Council considers that a further amendment to Policy SI3 Part 1.b would be beneficial. The Council therefore proposes the following modification: Policy SI1: Existing community facilities and health facilities 1. Existing facilities will be protected and should not be lost to other uses, reconfigured, reduced in size or relocated unless it can be demonstrated that the following criteria are met: a. The needs of the current users of the facility, potential or future users (where the facility is not in use) are met through: i. provision of a suitable on-site replacement facility; or ii. a suitable off-site replacement, within the local well-connected neighbourhood of the original facility; or iii. an existing local facility, within the local well-connected neighbourhood which is suitable, available and affordable; or b. the existing and any other social infrastructure use is no longer required, as demonstrated by: i. an assessment that the existing use is surplus to current and future needs; and; ii. <u>i.</u> evidence that the facility has been actively marketed for community or health social infrastructure use for at least 12 months and it can be clearly shown there is no alternative social infrastructure use that could take on the space to meet the needs of the local neighbourhood; or iii. <u>ii.</u> the proposal is part of a strategy from a recognised public sector body's estates programme; and c. a Social Value and Health Impact Assessment (see Local Plan Policy BFN3) is provided and demonstrates potential gains are maximised and any negative impacts can be mitigated.
MM40	SI3 Cultural facilities and sport and recreation facilities	MMC-E-191	University College London	Modification supported.	Support noted.
MM41	SI3 Cultural facilities and sport and	MMC-C-097	Centro Planning Consultancy	Support for the objective of ensuring that new sport and recreation facilities respond to identified needs.	Support noted. This wording change is not supported. We do not consider this change to

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
	recreation facilities			Object to the proposed implementation text because it is too restrictive in requiring applicants to demonstrate consultation of Newham's Built Leisure Needs Assessment (2025) in all cases. Consider that the evidence needed to justify a sport or recreation facility will vary depending on the nature, scale and intended users of a proposal, and that the Built Leisure Needs Assessment does not cover all leisure uses or reflect all site-specific circumstances. Suggest amending the implementation text to allow a broader range of evidence sources to be used when demonstrating need. Proposes the following wording: "applicants should demonstrate an understanding of need through proportionate and up-to-date evidence. This should include Newham's Built Leisure Needs Assessment (2025) where relevant, however other relevant sources such as national governing body strategies, participation data, industry reports, and local demand analysis may also be provided. Applicants should also engage with the local community and Sport England." Considers that this wording would allow decision-makers to consider the most relevant and proportionate evidence for each proposal rather than relying on a single evidence source. Considers that the proposed amendment would improve the effectiveness of the policy while continuing to ensure that new sport and recreation facilities respond to identified needs.	MM41 to be necessary as the reference to Newham's Built Leisure Needs Assessment (2025) is intended to ensure that proposals are informed by the Council's adopted evidence base, which provides the most up-to-date assessment of existing provision, needs and deficiencies across the borough. The Council notes that the implementation text requires applicants to demonstrate that they have had regard to the Built Leisure Needs Assessment. It does not prevent applicants from submitting additional supporting evidence where appropriate. Applicants may provide further information, including evidence from national governing bodies, participation data, industry reports or local demand assessments, where relevant to support their proposals. The Council therefore considers the approach to be justified, effective and consistent with national policy. The current wording provides sufficient flexibility whilst ensuring that decisions are informed by the Council's robust evidence base. The Council is satisfied that the plan remains sound without the proposed changes.
MM41	SI3 Cultural facilities and sport and recreation facilities	MMC-E-294	Sport England	Welcome the requirement for new sport and recreation facilities to be informed by the Council's Built Leisure Needs Assessment. Suggest applying this requirement both within and outside site allocations. Consider this would help ensure that appropriate sport and recreation facilities are delivered in the right locations to meet current and future needs and address any identified deficits in provision.	Support noted. This wording change is not supported. We do not consider this change to MM41 to be necessary as the supporting implementation text for Policy SI3 part 2 already requires applicants proposing new sport and recreation facilities to have regard to Newham's Built Leisure Needs Assessment. This requirement applies to proposals within site allocations and to proposals coming forward outside allocated sites. The Council therefore considers that the matter is already addressed by the Plan. The Council is satisfied that the plan remains sound without the proposed changes.
MM43	SI4 Education and childcare facilities	MMC-E-035	New Vic	Modification supported.	Support noted.
MM43	SI4 Education and childcare facilities	MMC-E-294	Sport England	Object to the proposed modification relating to education and childcare developments. Considers that the proposed modification is contrary to paragraph 104 of the NPPF because it appears to remove the requirement to comply with Policy SI3 when sports facilities may be lost or reduced. National policy does not provide an exception for education and childcare development and sports facilities should only be lost where the criteria in paragraph 104 of the NPPF are met. Suggest amending the modification to ensure appropriate	We do not consider this change to be necessary as the modification was proposed to clarify that education and childcare facilities are considered through Policy SI4 and to avoid duplication within the social infrastructure chapter. The Council does not agree that the modification is inconsistent with paragraph 104 of the NPPF, nor that additional reference to Policy SI3 is required. Policy SI4 provides the primary policy framework for the delivery, expansion, adaptation and reconfiguration of education and childcare facilities. The Council considers that Policy SI4 provides appropriate

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
				protection for sports facilities. The respondent suggests either referencing compliance with paragraph 104 of the NPPF or including a requirement that existing sports facilities continue to be protected in accordance with Policy SI3. Note: The respondent considers that, without these changes, the modification would be unsound.	protection against the loss of indoor sporting facilities ancillary to educational uses. Part 4 of the policy resists the loss of education facilities and permits their loss only where it can be demonstrated that there is no identified long-term need for the facility in that location. Furthermore, where proposals involve the reconfiguration of an educational facilities, Part 6 of Policy SI4 applies. This requires schools to comply with the relevant building regulations and guidance for childcare, schools, and further education facilities, including BB103 Area Guidelines for Mainstream Schools (Department for Education (2014). BB103 sets out the expectation for the provision of sports, performance, dining and social spaces within educational establishments. In relation to playing pitches, the Local Plan should be read as a whole. Existing playing pitches and playing fields, including those associated with educational establishments, are protected by Policy GWS1. Notwithstanding the above, the Council agrees that additional clarification would be beneficial. The use of the word 'only' within MM43 could be interpreted as suggesting that education and childcare proposals are not required to comply with the wider development plan framework. To avoid ambiguity and ensure the policy is effective, the Council proposes the following amendment: <u>Education and childcare facilities are required to comply with Local Plan Policy SI4 only, and are not subject to Policies SI1, SI2 or SI3.</u> The Council also proposes the addition of the following glossary definitions, based on Sport England's definition, to clarify that playing pitches and sports fields within educational establishments are protected by Policy GWS1: Playing Field: The whole of a site that encompasses at least one playing pitch and any associated land required for the functioning of outdoor sport. This includes land used for pitch rotation, reconfiguration and maintenance, safety run-off areas and ancillary facilities supporting the sporting use of the site. Playing fields include those located at schools, colleges, universities and other educational establishments, whether available for community use or not. Playing Pitch: A delineated area of land which, together with any run-off area, is 0.2 hectares or more and is used for outdoor pitch sports including football, rugby, cricket, hockey, lacrosse, rounders, baseball, softball and other recognised pitch sports. Playing pitches include those located within schools, colleges, universities and other educational establishments, whether available for community use or not. The Council considers that these amendments provide sufficient clarity and ensure internal consistency across the Plan. The Plan therefore remains justified, effective and consistent with national policy, and is sound.

6. Inclusive Economy

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
Additional Modifications					
AM62	J1 Employment and growth	MMC-E-191	University College London	Suggest that in relation to site allocations the use of conditions limiting changes of use within Class E should be limited to a specific reason: <u>“All future developments incorporating office (E(g)(i)), research and development (E(g)(ii)) and/or light industrial (E(g)(iii)) floorspace within SILs, LILs, and <u>only</u> where necessary and justified within site allocations identified for mixed use or employment-led development, will be secured through conditions to limit uses consented within Class E, in order to achieve the objective of this policy”.</u>	This wording change is not supported. We do not consider this change to be necessary as the wording 'where necessary' sufficiently provides for the flexibility required. The grammatical error is noted. The Council supports the suggestion made to add a comma.
Comments not specific to Main Modifications					
N/A	J3 Protecting employment floorspace	MMC-C-097	Centro Planning Consultancy	Suggest that a modification is required to policy J3 Part 5 to ensure consistency with modification made to D6.2 implementation text [MM23]], by allowing the loss of employment floorspace in such a scenario where the retention of the floorspace would also preserve significant amenity issues. Suggested new part c.: c. the lawful and reasonable operation of the employment floorspace results in undue amenity issues to surrounding sensitive land uses that cannot be mitigated reasonably Suggestion to implementation text: Alternatively, it may be the case that existing employment floorspace outside of employment designations and site allocations is no longer compatible with surrounding sensitive uses for reasons of adverse amenity impacts. Whilst situations like this are sought to be avoided under Local Plan Policy D6, it is recognised that residual or unintended amenity issues may still arise. In such circumstances, where these amenity issues are demonstrable and unable to be addressed without resulting in fundamental operational or viability constraints that go to the heart of the site's use for employment, its loss will be considered acceptable. Full details of such operational and viability constraints will be required for submission.	This wording change is not supported. We do not consider these further modifications to the Plan to be necessary as policies D6.2 and J3 are justified and consistent. Policy J3 approach is justified by the significant expected demand for employment uses over the plan period to 2042 - please refer to examination library documents EWS039 and EWS039a. Policy D6 Part 2 protects designated and non-designated employment locations through the agent of change approach, clarifying that in the planning balance, retention of employment floorspace is a strategic priority. MM23 to the implementation text of policy D6.2 was necessary in order to ensure that employment sites can reasonably intensify within the margins allowed for their lawful operation, and that the spatial strategy for intensification on SILs and LILs is safeguarded. This ensures the Plan is justified and consistent. We recognise that there may be circumstances where the mix of established lawful developments in an area may include nuisance generating uses alongside residential or other more vulnerable uses. However, generally, existing issues can be resolved by the Council through its Environmental Health enforcement powers, such as a requirement to install sound insulation or extractor fans. Further, employment uses, as defined in the glossary of the Local Plan, include a range of uses that would normally not have a significant amenity impact. As such, the requirement for marketing assessment set out in Policy J3 sufficiently addresses the concern raised by allowing for the employment land to come into an alternative, less intensive form of use, should it not be possible to mitigate amenity impacts of an existing operational model. The Council is satisfied that the plan remains sound without the proposed changes.

7. Homes

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
Main Modifications					
MM49	H1 Meeting Housing Needs	MMC-E-015	Greater London Authority	Welcomes MM49 in relation to housing targets, which align with LBN's annualised housing target in the London Plan (2021).	Support noted.
MM50	H1 Meeting Housing Needs	MMC-E-015	Greater London Authority	Welcomes MM50 in relation to housing targets, which align with LBN's annualised housing target in the London Plan (2021).	Support noted.
MM52	H3 Affordable housing	MMC-E-222	Ballymore Group	Welcome the closer alignment with the London Plan threshold approach for affordable housing.	Support noted.
MM52	H3 Affordable housing	MMC-E-222	Ballymore Group	Welcomes the revised affordable housing approach. They consider that aligning the policy with the London Plan provides a more flexible and deliverable framework and enables the Plan to respond to changing policy and market conditions. The respondent recommends avoiding fixed affordable housing percentages to ensure consistency with the evolving London Plan and the Mayor's Support for Housebuilding London Plan Guidance.	Support noted.
MM52	H3 Affordable housing	MMC-E-222	Ballymore Group	The respondent welcomes the modification. They consider that aligning with the London Plan threshold approach provides a more flexible and policy-compliant framework. The respondent considers that a clear and flexible approach is necessary to ensure the Plan remains effective and able to respond to future changes in strategic policy, including the ongoing review of the London Plan. The respondent is concerned that specific affordable housing percentage expectations could be reintroduced explicitly or through supporting text. The respondent recommends that the policy consistently and clearly defers to the London Plan threshold approach and any up-to-date Mayoral guidance, including the Support for Housebuilding London Plan Guidance.	Support noted. We consider the policy wording and supporting text provide sufficient clarity on the policy's implementation and address the respondent's concerns.
MM52	H3 Affordable housing	MMC-E-195	Berkeley Group	The respondent broadly supports MM52. They welcome the amendment because it brings Policy H3 more closely into line with London Plan Policy H6. The respondent objects to the continued lack of equal weight given to the Viability Tested Route within the policy. They consider this to be important because the Council's viability evidence indicates there is no clear level of affordable housing that most schemes can viably deliver. The respondent suggests refining the wording of Policy H3 so that both routes under London Plan Policy H5 are recognised	Support noted. With regards to the suggested amendment, this wording change is not supported. We do not consider this change to the modification to be necessary as the modification was proposed in order to bring the plan into general conformity with the London Plan. We do not agree that the policy wording or supporting text give less weight to the viability tested route. The Council is satisfied that the plan remains sound without the proposed changes.

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
				equally. They recommend avoiding any implication that the Viability Tested Route should only be used in exceptional circumstances.	
MM52	H3 Affordable housing	MMC-E-015	Greater London Authority	Support MM52 as it resolves the general conformity concern raised at Regulation 19 stage. Support the proposed changes to tenure mix requirements.	Support noted.
MM52	H3 Affordable housing	MMC-E-217	London Legacy Development Corporation	Support MM52 as it is in general conformity with the London Plan.	Support noted.
MM52	H3 Affordable housing	MMC-C-096	NHS Property Services (NHSPS) Limited	Supports modification MM52	Support noted.
MM53	H4 Housing mix	MMC-E-222	Ballymore Group	Welcome the amendments to the housing mix requirements, in particular the changes to family housing provision.	Support noted.
MM53	H4 Housing mix	MMC-E-222	Ballymore Group	Welcomes the proposed changes to housing mix requirements. They consider that focusing the requirement for family housing on the social rent element of developments reflects where need is greatest and aligns with London Plan guidance. The respondent considers the approach to be pragmatic, helping to balance housing needs with deliverability. The respondent supports greater flexibility for market and intermediate housing tenures. They consider this would enable a more design-led approach to development, support scheme optimisation, and avoid unnecessary constraints that could affect viability and delivery.	Support noted.
MM53	H4 Housing mix	MMC-E-222	Ballymore Group	Welcome the proposed modifications to Policy H4. They consider that rigid unit mix requirements across all tenures can constrain scheme design, affect viability and deliverability, and reduce the ability of development to respond to identified housing needs and demand.	Support noted.
MM53	H4 Housing mix	MMC-E-195	Berkeley Group	Welcome the amendment to MM53 that refocuses the 40% family homes target on social rent homes only. The respondent considers this a positive change that aligns more closely with London Plan Policy H10(B). Object to the requirement that 15% of social rent homes on site allocations must be four-bedroom homes. The respondent considers this insufficiently flexible to respond to site-specific circumstances such as location, accessibility, design, capacity, viability, deliverability as well as upfront costs for enabling works and infrastructure delivery. Object on the basis that the Council has not provided sufficient viability evidence to justify increasing the requirement from 5% to 15%. The respondent also considers that the requirement	Support noted. With regards to the 4 bedroom target, this wording change is not supported. We do not consider this change to the modification to be necessary as the modification was proposed in order to ensure the four bedroom target remains aligned with evidence of identified need as set out in the Strategic Housing Market Assessment (EB056, Figure 48). The higher percentage required reflects the fact that family housing is now only sought in the social rent tenure (i.e. the 4 bed target represents a larger proportion of the overall family housing requirement). This level of provision was reflected in the housing mix scenarios tested in the London Borough of Newham Local Plan Regulation 19 viability report (EB099). With regards to implementation, the policy requirement is not subject to viability testing in the same way as H4.2, ensuring the policy is effective and responsive

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
				could constrain housing delivery on key site allocations and prevent the effective optimisation of land, contrary to London Plan Policies GG2 and D3.	individual site circumstance. This ensures the Plan is justified and effective, while also being responsive to London Plan Policy GG4's requirement to provide for identified housing needs. The Council is satisfied that the plan remains sound without the proposed changes.
MM53	H4 Housing mix	MMC-E-195	Berkeley Group	Welcome the removal of the proposed cap on one-bedroom, two-person homes. Object to retaining the 5% cap on studio (1B1P) homes. The respondent considers that a fixed cap on smaller homes is inconsistent with the flexibility supported by London Plan Policy H10, which allows a higher proportion of smaller homes in highly accessible locations, and Policy SD6(D) which recognises the role of one-bedroom homes in meeting housing need and reducing pressure to convert or subdivide larger homes. The respondent suggests that Policy H4 allows housing mix to respond to site-specific circumstances rather than imposing fixed limits. Suggest that housing mix requirements reflect factors such as accessibility, site characteristics, development constraints, viability and market conditions.	Support noted. With regards to the requirements for studio homes, this comment does not relate to a proposed Main Modification. The Council's position on this matter is set out in the Matter 5 Response (EWS030, paragraph 3.13).
MM53; AM81	H4 Housing mix	MMC-E-196	Berkeley Group	Object to the requirement for developments on site allocations to "aim to deliver" a minimum of 15% of social rent homes as four or more-bedroom affordable homes. The respondent considers this requirement too onerous and states that the increase from 5% to 15% has not been adequately justified or supported by evidence. Suggest amending the wording to make clear that the 15% figure is not a fixed requirement within the overall 40% target for family-sized social rent homes. Suggest that the policy expressly confirms that flexibility will be applied where necessary.	This wording change is not supported. We do not consider this change to the modification to be necessary as the modification was proposed in order to ensure the four bedroom target remains aligned with evidence of identified need as set out in the Strategic Housing Market Assessment (EB056, Figure 48). The higher percentage required reflects the fact that family housing is now only sought in the social rent tenure (i.e. the 4 bed target represents a larger proportion of the overall family housing requirement). This level of provision was reflected in the housing mix scenarios tested in the London Borough of Newham Local Plan Regulation 19 viability report (EB099). With regards to implementation, the policy requirement is not subject to viability testing in the same way as H4.2, ensuring the policy is effective and responsive individual site circumstance. This ensures the Plan is justified and effective, while also being responsive to London Plan Policy GG4's requirement to provide for identified housing needs. The Council is satisfied that the plan remains sound without the proposed changes.
MM53; AM85	H4 Housing mix	8	Berkeley Group	Welcome the removal of the cap on one-bedroom, two-person homes. Object to the continued maximum delivery expectation for studio homes and one-bedroom, one-person homes. The respondent considers that a fixed 5% cap is inconsistent with the flexibility required by London Plan Policy H10, particularly in highly accessible locations where a higher proportion of smaller homes may be appropriate.	This comment does not relate to a proposed Main Modification. The Council's position on this matter is set out in the Matter 5 Response (EWS030, paragraph 3.13).

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
				Suggest deleting the 5% cap on studio and one-bedroom, one-person homes. Suggest that, if a cap is retained, it should include flexibility to reflect site-specific circumstances. The respondent recommends taking account of location, accessibility, site context, housing need, viability and optimisation.	
MM53	H4 Housing mix	MMC-E-015	Greater London Authority	Note MM53 does not raise strategic concerns.	Comment noted.
MM53	H4 Housing mix	MMC-E-217	London Legacy Development Corporation	Support that Policy H4 has been amended to prioritise family housing within the social housing tenure as this is more reflective of demand and the Council's evidence base.	Support noted.
MM54	H5 Build to Rent housing	MMC-E-034	Unite Students	Note representations centre around Policies H5 and the relevant Main Modifications MM54.	Comment noted.
MM54	H5 Build to Rent housing	MMC-E-034	Unite Students	Supports Main Modification MM54, which aligns the Build to Rent policy with the London Plan approach to affordable housing provision. They consider this responds to viability concerns and is consistent with the London Plan and the Mayor's Housebuilding for London Guidance.	Support noted.
MM54	H5 Build to Rent housing	MMC-C-100	Watkin Jones	Notes MM54 doesn't accommodate the comments made by the representor on the Regulation 19 version of the plan.	This wording change is not supported. We do not consider any further modifications to the Plan to be necessary as the modification was proposed in order to bring the affordable housing requirement for build to rent into general conformity with the London Plan.N24 This ensures the Plan is effective and in general conformity with the London Plan. With regards to dual viability assessments and management requirements, the Council's position on these matters is set out in the Regulation 19 Consultation Report The Council is satisfied that the plan remains sound without the proposed changes.
MM56	H5 Build to Rent housing	MMC-C-100	Watkin Jones	Notes MM56 doesn't accommodate the comments made by the representor on the Regulation 19 version of the plan.	This wording change is not supported. We do not consider any further modifications to the Plan to be necessary as the modification was proposed in order to bring the affordable housing requirement for build to rent into general conformity with the London Plan. This ensures the Plan is effective and in general conformity with the London Plan. The Council is satisfied that the plan remains sound without the proposed changes.
MM57	H8 Purpose-built student accommodation	MMC-E-222	Ballymore Group	The respondent is concerned that the current drafting could introduce fixed or implicit affordable housing contribution requirements, or be interpreted in a way that departs from the flexible, threshold-based approach set out in the London Plan.	This wording change is not supported. We do not consider this change to be necessary as the modification was proposed in order for the plan to be in general conformity with the London Plan. We do not consider this policy introduces fixed affordable housing requirements for PBSA schemes as the

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
				The respondent recommends that to ensure effectiveness the PBSA policy aligns clearly with the London Plan approach to affordable housing contributions and viability. They consider that policies should avoid fixed or assumed levels of provision and instead allow for site-specific viability considerations, constraints and future policy changes. The respondent highlights the Support for Housebuilding London Plan Guidance and the ongoing London Plan review as reasons why policy flexibility and consistency are important.	policy defers to the London Plan. This ensures the Plan remains in general conformity with the London Plan, and will be effective across the duration of the plan period. The Council is satisfied that the plan remains sound without the proposed changes.
MM57	H8 Purpose-built student accommodation	MMC-E-222	Ballymore Group	The respondent is concerned that the policy continues to assess PBSA largely in isolation and does not adequately recognise its role within wider residential-led redevelopment schemes. The respondent suggests greater policy flexibility and explicit support for PBSA where it forms part of a wider redevelopment proposal. They consider this would support the delivery of strategic sites, increase housing choice, contribute to mixed and balanced communities, and improve the overall planning balance.	This wording change is not supported. We do not consider any further modifications to the Plan to be necessary as the modification was proposed in order to ensure Policy H8 is positively prepared to meet the needs of both people requiring general needs housing and students. Continuing to support PBSA, either standalone or as part of mixed-use developments, in areas of over-concentration risks overproviding PBSA bedspaces above need and further reduces available land for general needs homes. This ensures the Plan is positively prepared to meet the needs of both students and people requiring general needs homes. The Council is satisfied that the plan remains sound without the proposed changes.
MM57	H8 Purpose-built student accommodation	MMC-E-222	Ballymore Group	The respondent objects to the continued assessment of PBSA in isolation. They consider this fails to recognise the benefits PBSA can provide within larger redevelopment proposals. They consider PBSA can support housing delivery, viability, housing choice, mixed communities and wider regeneration objectives. The respondent recommends that Policy H8 explicitly support PBSA as part of wider redevelopment schemes and proposes the following additional criterion: "Purpose-built student accommodation will also be supported where it forms part of a wider mixed-use or residential-led redevelopment proposal and contributes positively to the delivery of a mixed and balanced community, the optimisation of a strategic site, and the overall regeneration objectives of the Borough." They consider this would improve the policy's effectiveness and flexibility and address concerns raised during the Examination process.	This wording change is not supported. We do not consider any further modifications to the Plan to be necessary as the modification was proposed in order to ensure Policy H8 is positively prepared to meet the needs of both people requiring general needs housing and students. Continuing to support PBSA, either standalone or as part of mixed-use developments, in areas of over-concentration risks overproviding PBSA bedspaces above need and further reduces available land for general needs homes. This ensures the Plan is positively prepared and effective in ensuring housing delivery to meet pressing housing needs over the plan period is not undermined The Council is satisfied that the plan remains sound without the proposed changes.
MM57	H8 Purpose-built student accommodation	MMC-E-091	Impact Partnership Joint Venture (previously IQL Office LP)	Welcomes the changes to the methodology for monitoring the overconcentration of Purpose-Built Student Accommodation (PBSA), particularly the criterion that PBSA would be considered overconcentrated if it exceeds 25% of net residential approvals and completions over the plan period.	This wording change is not supported. We do not consider this change to be necessary as the modification was proposed to ensure Policy H8 is positively prepared to meet the needs of both people requiring general needs housing and students. The approach taken in Policy H8 seeks to positively manage future PBSA and

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
				Objects to Part 1 of Policy H8 applying to the Stratford & Maryland Neighbourhood. They argue that available planning permissions, applications and completions show PBSA accounts for only 20.5% of housing delivery in the SM Neighbourhood, which is below the proposed 25% overconcentration threshold. An appended Knight Frank PBSA Demand and Market Assessment has been prepared to support a planning application in the Stratford and Maryland Neighbourhood. The appendix provides details of PBSA Delivery and Applications in the Plan Period from 2023 and Housing Delivery and Applications in the Plan Period from 2023. It concludes that there is a significant and growing need for purpose-built student accommodation in Stratford. It identifies 16,649 full-time students living within 1.5 miles of the site, compared with only 3,598 existing PBSA bedspaces, with strong growth projected in local student numbers driven by nearby universities and expanding campuses. Although additional PBSA is proposed in the pipeline, the report states that demand is likely to continue to exceed supply, resulting in ongoing pressure on the private rented sector and supporting the need for further student accommodation provision. The respondent also objects to the methodology because it focuses on housing delivery during the plan period and does not take account of the existing housing mix and community balance, which they state is predominantly general needs housing. They further object to the additional restrictions applying only to the Stratford & Maryland Neighbourhood throughout the plan period regardless of monitoring outcomes. They consider this disproportionate, unsupported by evidence, and too inflexible to respond to future changes in PBSA and general needs housing delivery. They therefore consider the policy unjustified and not positively prepared. Suggest that Part 1 of Policy H8 should be removed. They recommend that the SM Neighbourhood should instead be subject to the same overconcentration monitoring criteria as all other neighbourhoods in the borough. They also suggest that any assessment of overconcentration should take account of the existing housing mix and balance of the community, rather than focusing solely on housing delivery during the plan period. They consider the approach in H8 and MM57 is insufficiently evidenced, inflexible, and inconsistent with strategic policy. They argue it prevents PBSA proposals from being assessed on their individual merits and does not reflect growth in the higher education sector or increasing student numbers. They also state	general needs delivery to meet need, rather than changing existing housing mix in the neighbourhood. The policy approach in the Stratford and Maryland neighbourhood is justified, noting the significant delivery of PBSA already planned to meet student needs in this neighbourhood to date. Since 2019/20: • 1,035 PBSA bedspaces have been delivered in this neighbourhood; • 5,685 PBSA bedspaces have planning permission; and • 1,429 PBSA bedspaces have a resolution to grant planning permission (see TP003 Table 1; since this Topic Paper was published University Of East London Stratford Campus has been approved, and the Stratford High Street scheme has an approval to increase the number of bedspaces to 692). The policy position therefore reflects that significant planned PBSA delivery in this neighbourhood to date to meet need (see TP003, Section 4). The Newham housing trajectory produced to support the examination (EWS026a) shows that 10,931 general needs homes are planned to be delivered in Stratford and Maryland from 27/28, which represents 21% of planned general needs delivery across this period. It is therefore critical to ensure that future housing delivery in this neighbourhood delivers sufficient general needs homes to ensure we don't undermine our ability to address the highest housing needs in the borough, namely for family and affordable homes (which represent 59% and 53% of need respectively). Continuing to support PBSA, either standalone or as part of mixed-use developments, in areas of over-concentration risks overproviding PBSA bedspaces above need and further reduces available land for general needs homes. We consider our evidence of considerable planned PBSA delivery justifies a more stringent approach to new PBSA delivery than Policy H15 of the London Plan. This ensures the Plan is: - positively prepared to meet the needs of both students (through existing consented schemes in the neighbourhood) and people requiring general needs homes; - Justified by evidence of the considerable pipeline of PBSA in the neighbourhood; - Effective in ensuring housing delivery to meet pressing housing needs over the plan period is not undermined; and - In general conformity with the London Plan. The Council is satisfied that the plan remains sound without the proposed changes.

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
				that it fails to recognise the role of PBSA in supporting mixed-use development viability and affordable housing delivery. The respondent considers the approach to the Stratford and Maryland neighbourhood is inconsistent with the NPPF requirement for plans to be positively prepared and wider Government and Mayor of London objectives to increase housing delivery and affordable homes via less restrictive policies. Suggests Part 1 should be removed because there is no evidence to justify a separate approach for the Stratford and Maryland Neighbourhood. They also consider it is too inflexible and would not allow for changes in PBSA delivery over the plan period. Note proposed text amendments are set out in appendix c of their representation. They consider these changes will ensure the the policy is sound, implementable, positively prepared and supports meeting student and broader housing needs. Suggests the following changes to H8.1 and H8.2 modifications (in red): H8: Purpose-built student accommodation 1. New purpose-built student accommodation in Stratford and Maryland neighbourhood will only be supported where: a. it is located within or adjacent to an existing <u>or approved</u> campus development in the neighbourhood; or b. it is solely providing a replacement facility with no net increase in bed spaces. 2. New purpose-built student accommodation in all other neighbourhoods outside Stratford and Maryland will only be supported where: a. it is located within or adjacent to an existing <u>or approved</u> campus development in the borough; or 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 c. <u>and</u> it will not create an over-concentrations saturation of purpose-built student accommodation; or c. 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 campus development in the borough. Suggests the following changes to H8.1 Implementation text (in red): H8.1 Part 1 of the policy sets out spatial requirements for the delivery of purpose built student accommodation in the Stratford and	

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
				Maryland-Neighbourhood. 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 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. Suggests the following changes to H8.2 Implementation text (in red): "Part 2 1 of the policy sets out spatial requirements for the delivery of purpose built student accommodation in all other neighbourhoods outside of Stratford and Maryland Neighbourhood."	
MM57	H8 Purpose-built student accommodation	MMC-E-091	Impact Partnership Joint Venture (previously IQL Office LP)	The respondent objects to Part 4 of Draft Policy H8. They consider it inconsistent with London Plan Policy H15 because it requires all bedrooms in PBSA developments within overconcentrated areas to be secured through Nominations Agreements (NAs) and requires those agreements to be linked to a nearby higher education institution (HEI). They state that the London Plan only requires a majority of bedrooms to be secured through NAs and does not require a spatial link to a local HEI. The respondent also objects on viability and delivery grounds. They argue that many HEIs are reluctant to enter into larger NAs due to commercial risks. They state that increased NA requirements would require greater discounts on rents, reducing PBSA viability and potentially affecting the delivery of general and affordable housing in mixed-use schemes. They also argue that stricter requirements could reduce HEI interest and increase pressure on the private rented sector as student numbers grow. The respondent suggests removing or rewording criteria b and c of Part 4. They recommend aligning the policy with the London Plan. They consider a more flexible approach would support HEI needs, PBSA viability and wider housing delivery. The respondent considers these criteria are not consistent with London Plan Policy H15 and would place unreasonable additional requirements on development proposals. They state this could make Nomination Agreements harder and more expensive to secure and could negatively affect the viability of mixed-use developments. Note proposed text amendments are set out in appendix c of	This wording change is not supported. We do not consider this change to the modification to be necessary as the modification was proposed to ensure part 4 of the policy is positively worded to respond to adjacent campus growth, be it operational or subject to an approved planning permission. More broadly, the purpose of Policy H8 seeks to ensure that the plan is positively prepared to meet significant housing needs over the plan period, namely for family and affordable homes (which represent 59% and 53% of need respectively). Continuing to support PBSA, either standalone or as part of mixed-use developments, in areas of over-concentration risks overproviding PBSA bedspaces above need and further reduces available land for general needs homes. Therefore, the policy seeks to ensure that in areas that experience over-concentration, new PBSA delivery is limited to opportunities for local campus growth. Such an approach should support existing and planned campuses to respond to their identified need for new accommodation, thereby reducing pressure on the private rented sector. We consider our evidence of considerable planned PBSA delivery and identified need for general needs housing, justifies a more stringent approach to nominations agreements than Policy H15 of the London Plan (see EWS030, Q6.7d response). This ensures the Plan is positively prepared, and effective in continuing to meet the needs associated with local campus growth and in general conformity with the London Plan. The Council is satisfied that the plan remains sound without the proposed changes.

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
				their representation. They consider these changes will ensure the the policy is sound, implementable, positively prepared and supports meeting student and broader housing needs. Suggests the following changes to H8.4 modifications (in red): 4. New purpose-built student accommodation should: a. secure the majority of the bedrooms in the development, including all of the affordable student accommodation bedrooms, through a nomination agreement, for occupation by students of one or more higher education providers; or b. in areas of over saturation<u>concentration</u>, secure all of the bedrooms in the development through a nomination agreement, for occupation by students of one or more higher education providers; and c. where purpose built student accommodation is being delivered within or adjacent to an existing <u>or approved</u> campus development in the borough in accordance with H8. part 1.a or H8. part 2.ad, 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. [...] Suggests the following changes to H8.4 Implementation text (in red): H8.4 Areas of over saturation<u>concentration</u> will be assessed in accordance with the definition of over saturation<u>concentration</u> in the 'ALL' implementation text for Policy H8 above. In areas that don't experience over saturation<u>concentration of purpose built student accommodation</u>, {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. 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. If a nominations agreement cannot be secured by the point of	

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
				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: • 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. Proposals that would create or worsen an over-saturationconcentration 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. <u>part 1.a</u> or H8. <u>part 2.ad</u>, the policy requires the nominations agreement to be secured for occupation by students of the higher education provider that the development is located is within or adjacent to. Proposals creating an over-saturationconcentration 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. 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.	
MM57	H8 Purpose-built student accommodation	MMC-E-295	Telford Living	Object to Policy H8's restrictive approach to purpose-built student accommodation (PBSA), which limits development to a narrowly defined area within Stratford. Object on the basis that the policy does not align with London Plan Policies H15, GG2 and SD1. They state that the policy could prevent appropriate development on well-connected sites, reduce flexibility in responding to student accommodation needs, and hinder the growth of higher education institutions in and around the Queen Elizabeth Olympic Park.	This wording change is not supported. We do not consider this change to be necessary as the modification was proposed to ensure Policy H8 is positively prepared to meet the needs of both people requiring general needs housing and students. The policy approach in the Stratford and Maryland neighbourhood is justified, noting the significant delivery of PBSA already planned to meet student needs in this neighbourhood to date. Since 2019/20: • 1,035 PBSA bedspaces have been delivered in this neighbourhood; • 5,685 PBSA bedspaces have planning permission; and • 1,429 PBSA bedspaces have a resolution to grant planning permission

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
				Object to the evidence supporting the policy. The respondent considers that the Council has not provided sufficient justification for such restrictive spatial controls and has not adequately demonstrated why sites outside the identified locations would be unsuitable. They also argue that alternative, criteria-based approaches have not been properly explored. Object to the Council's assessment of student accommodation need. They state that the Strategic Housing Market Assessment understates demand because it excludes several higher education institutions and therefore does not provide a reliable basis for limiting PBSA delivery. They also argue that the policy fails to recognise that much of the existing and future student population is concentrated in the Stratford area. Object that previous representations and concerns raised during the examination process do not appear to have been fully addressed, particularly regarding consistency with London Plan Policy H15, the testing of alternative approaches, and transparency in decision-making. The respondent considers the policy fails the NPPF tests of soundness because it is not: • Positively prepared, as it constrains delivery against local and London-wide student accommodation needs. • Justified, due to insufficient evidence supporting a departure from the London Plan's flexible approach. • Effective, because restrictive zoning may limit delivery and market responsiveness over the plan period. • Consistent with national policy, particularly in relation to supporting housing delivery and flexibility. Suggest removing or significantly relaxing the restrictive locational approach in Stratford and aligning the policy more closely with London Plan Policy H15. Suggest replacing the restrictive spatial approach with a criteria-based policy that allows PBSA proposals where they: • Demonstrate need. • Are in accessible and well-connected locations. • Meet appropriate design and amenity standards. • Do not prevent the delivery of residential development on allocated housing sites. Suggest providing further evidence and justification if any spatial restrictions are retained, including clear demonstration of alignment with London Plan objectives. Suggest further clarification on how objections raised through the examination process have been considered and addressed. The respondent highlights its experience delivering residential development in Newham and its involvement in current and	(see TP003 Table 1; since this Topic Paper was published University Of East London Stratford Campus has been approved, and the Stratford High Street scheme has an approval to increase the number of bedspaces to 692) The policy position therefore reflects that significant planned PBSA delivery in this neighbourhood to date to meet need (see TP003, Section 4). Although the representation points to additional university growth beyond campuses listed in the SHMA, it is important to note that a number of the intuitions listed are located outside Newham's borough boundary. Those which are located in Newham either cater to limited cohorts or help facilitate blended and distance learning, and are therefore unlikely to generate significant additional need for PBSA. The Newham housing trajectory produced to support the examination (EWS026a) shows that 10,931 general needs homes are planned to be delivered in Stratford and Maryland from 27/28, which represents 21% of planned general needs delivery across this period. It is therefore critical to ensure that future housing delivery in this neighbourhood delivers sufficient general needs homes to ensure we don't undermine our ability to address the highest housing needs in the borough, namely for family and affordable homes (which represent 59% and 53% of need respectively). Continuing to support PBSA, either standalone or as part of mixed-use developments, in areas of over-concentration risks overproviding PBSA bedspaces above need and further reduces available land for general needs homes. Therefore, the policy seeks to ensure that in areas that experience over-concentration, new PBSA delivery is limited to opportunities for local campus growth. Such an approach should support existing and planned campuses to respond to their identified need for new accommodation, thereby reducing pressure on the private rented sector. We consider our evidence of considerable planned PBSA delivery justifies a more stringent approach to PBSA delivery than Policy H15 of the London Plan. New PBSA delivery will also be supported in well connected town and local centre locations outside areas of over-concentration. This ensures the Plan is: - positively prepared to meet the needs of both students (through existing consented schemes in the neighbourhood) and people requiring general needs homes; - Justified by evidence of the considerable pipeline of PBSA in the neighbourhood; - Effective in ensuring housing delivery to meet pressing housing needs over the plan period is not undermined; - In general conformity with the London Plan; and - the National Planning Policy Framework's overall aim to meet an area's identified housing need. The IIA for the Local Plan did assess the reasonable alternative of allowing for nominations agreements with any university with a less directional steer in terms of location of accommodation. The reasonable alternative was not judged to perform better than the proposed policy approach.

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				proposed development projects. They consider PBSA to play an important role in meeting student demand and releasing pressure on the wider housing market by reducing reliance on the private rented sector.	The Council is satisfied that the plan remains sound without the proposed changes.
MM57	H8 Purpose-built student accommodation	MMC-E-034	Unite Students	Support the amendments proposed via MM57, and consider this change is necessary for soundness.	Support noted.
MM57	H8 Purpose-built student accommodation	MMC-E-034	Unite Students	Unite support MM57 in order to make the policy justified and effective.	Support noted.
MM57	H8 Purpose-built student accommodation	MMC-E-034	Unite Students	Welcome the proposed modification (MM57) that removes the requirement for replacement student accommodation facilities to provide no net increase in bed spaces. Object to Parts 1 and 2 of Draft Policy H8 and the proposed locational limits on purpose-built student accommodation (PBSA), including references to “over-concentration”. Object to the policy on the basis that it is not consistent with national policy and is not in general conformity with the London Plan. They state that restricting PBSA development conflicts with the NPPF objective of boosting housing supply and meeting the needs of students. They also argue that the restrictions go beyond London Plan Policy H15, which encourages PBSA in well-connected locations. Object to the policy on the basis that it is not positively prepared. The respondent refers to evidence in TP003 showing a continuing imbalance between student demand and available accommodation, namely a student-to-room ratio of 2.5:1. They consider that locational restrictions and the use of the word “only” would constrain delivery and fail to support identified need. Object to the policy on the basis that it is not effective. They argue that limiting development to locations within or adjacent to existing or approved campuses does not reflect limited land availability in those areas and could restrict the delivery of PBSA over the plan period. They also consider it contradictory to direct development towards sustainable locations whilst applying over-concentration thresholds that could prevent development in those locations. Object to the policy on the basis that it is not justified. The respondent argues there is insufficient evidence to support the proposed over-concentration thresholds. They state the methodology is based on dated appeal decisions from other boroughs and has not been robustly tested. They also argue that PBSA is a distinct and well-managed accommodation type and should not be treated in the same way as houses in multiple occupation (HMOs).	This wording change is not supported. We do not consider this change to be necessary as the modification was proposed to ensure Policy H8 is positively prepared to meet the needs of both people requiring general needs housing and students. Additional flexibility has also been introduced to the policy, such as a broader definition of ‘adjacent’ to ensure effectiveness. The justification for setting out overconcentration thresholds is provided in the 'H8: Purpose-build Student Accommodation Topic Paper 2025 (TP003 - see 'Measuring over-concentration' sub-heading'). The overconcentration thresholds seek to ensure that where PBSA delivery meets wider London needs, that these developments do not significantly reduce available land for general needs housing in the immediate local area. Continuing to support PBSA, either standalone or as part of mixed-use developments, in areas of over-concentration risks overproviding PBSA bedspaces above need (see TP003 Table 1 for details of the Council’s considerable pipeline of PBSA) and further reduces available land for general needs homes. This in turn affects our ability to address the highest housing needs in the borough, namely for family and affordable homes (which represent 59% and 53% of need respectively). Therefore, the policy seeks to ensure that in areas that experience over-concentration, new PBSA delivery is limited to opportunities for local campus growth. Such an approach should support existing and planned campuses to respond to their identified need for new accommodation, thereby reducing pressure on the private rented sector. We also consider our evidence of considerable planned PBSA delivery, noting not all students require access to PBSA, justifies a more stringent approach to PBSA delivery than Policy H15 of the London plan. New PBSA delivery will also be supported in well-connected town and local centre locations outside areas of over-concentration. This ensures the Plan is: - positively prepared to meet the needs of both students (through existing consented schemes in the neighbourhood) and people requiring general needs homes; - Justified by evidence of the considerable pipeline of PBSA in the neighbourhood; - Effective in ensuring housing delivery to meet pressing housing needs over the plan period is not undermined; - In general conformity with the London plan; and

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				The respondent suggests the following wording: 1. New purpose-built student accommodation in Stratford and Maryland neighbourhood will only be supported where: a. it is located within or adjacent to an existing or approved campus development in the neighbourhood; or b.b. it is solely providing a replacement facility with no net increase in bed spaces. 2. New purpose-built student accommodation in all other neighbourhoods outside Stratford and Maryland will only be supported where: a. It is in a sustainable, well-connected location such as a town centre, a local centre, an area with a high PTAL rating or in proximity to an existing or approved campus development. b. it is located within or adjacent to an existing or approved campus development in the borough; or c. 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 d. it will not create an over-concentration of purpose-built student accommodation; or e. 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.	- the National Planning Policy Framework's overall aim to meet an area's identified housing need. The Council is satisfied that the plan remains sound without the proposed changes.
MM57	H8 Purpose-built student accommodation	MMC-E-034	Unite Students	Object to Part 4b of the policy, which requires purpose-built student accommodation (PBSA) in areas of over-concentration to secure all bedrooms through a nomination agreement. The respondent considers this requirement too onerous and not in general conformity with the London Plan. They argue that stronger nomination agreement requirements conflict with the GLA's emerging approach and may hinder delivery. They state that viability evidence demonstrates such requirements can affect scheme viability and delivery. They note that schemes approved under London Plan Policy H15 have been allowed to proceed without nomination agreements where this increased development value, and that higher education institutions are becoming less willing to enter into such agreements due to funding constraints. Suggest a further main modification to remove Parts 4b and 4c of the policy in their entirety and introduce greater flexibility to Part 4a to make the policy part more effective. The respondent proposes the following amended wording: 4. New purpose-built student accommodation should try to: a. secure the affordable student accommodation majority of the bedrooms in the development, including all of the affordable student accommodation bedrooms; through a nomination agreement, for occupation by students of one or more higher	This wording change is not supported. We do not consider this change to the modification to be necessary as the modification was proposed to ensure part 4 of the policy is positively worded to respond to adjacent campus growth, be it operational or subject to an approved planning permission. More broadly, the purpose of Policy H8 seeks to ensure that the plan positively prepared to meet significant housing needs over the plan period, namely for family and affordable homes (which represent 59% and 53% of need respectively). Continuing to support PBSA, either standalone or as part of mixed-use developments, in areas of over-concentration risks overproviding PBSA bedspaces above need and further reduces available land for general needs homes. Therefore, the policy seeks to ensure that in areas that experience over-concentration, new PBSA delivery is limited to opportunities for local campus growth. Such an approach should support existing and planned campuses to respond to their identified need for new accommodation, thereby reducing pressure on the private rented sector. We consider our evidence of considerable planned PBSA delivery and identified need for general needs housing, justifies a more stringent approach to nominations agreements than Policy H15 of the London Plan (see EWS030, Q6.7d response). This ensures the Plan is positively prepared, effective in continuing to meet the needs of local HEIs and in general conformity with the London Plan. The Council is satisfied that the plan remains sound without the proposed changes.

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				education providers unless otherwise agreed with the Council; or b.in areas of over-concentration saturation, secure all of the bedrooms in the development through a nomination agreement, for occupation by students of one or more higher education providers; and c. where purpose-built student accommodation is being delivered within or adjacent to an existing or approved campus development in the borough in accordance with H8 part 1.a or H8 part 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. 5.	
MM57	H8 Purpose-built student accommodation	MMC-E-191	University College London	Welcome the addition of “or approved campus development” to Parts (1)(a) and (2)(a) of Policy H8. They consider this aligns with the approved UCL East development and would support future PBSA provision nearby. The respondent also supports the amendments to Part (3), which align the approach to affordable student accommodation with London Plan requirements.	Support noted.
MM57	H8 Purpose-built student accommodation	MMC-C-100	Watkin Jones	The respondent objects to the proposed over-concentration approach on the basis that it is not justified. They consider the policy is not supported by evidence that over-concentration currently exists or that PBSA is undermining the delivery of general needs housing. The respondent recommends that the Council provide evidence to justify the proposed thresholds and demonstrate where over-concentration exists and what harm it is causing. They also suggest that, if this evidence cannot be provided, Policy H8(2)(b) should be removed.	This wording change is not supported. We do not consider this change to be necessary as the modification was proposed to ensure Policy H8 is positively prepared to meet the needs of both people requiring general needs housing and students. The approach taken in Policy H8 seeks to positively manage future PBSA and general needs delivery to meet need, rather than changing existing housing mix in the neighbourhood. Continuing to support PBSA, either standalone or as part of mixed-use developments, in areas of over-concentration risks overproviding PBSA bedspaces above need and further reduces available land for general needs homes. The policy approach is also justified by evidence of the considerable pipeline of PBSA to meet need (see TP003 Table 1). The Council is satisfied that the plan remains sound without the proposed changes.
MM57	H8 Purpose-built student accommodation	MMC-C-100	Watkin Jones	The respondent objects to the requirement in Policy H8(4) for all PBSA proposals to be supported by a nominations agreement. They consider this assumes all higher education institutions can commit to long-term accommodation contracts and favours institutions with greater financial capacity. They argue that nominations agreements are only one indicator of need and that direct-let accommodation can also provide benefits. The respondent also draws a comparison with affordable housing, noting that planning applications can be accepted in principle without full support from a housing association at the application stage. The respondent recommends a more flexible approach. They suggest that evidence of “reasonable endeavours” and written support from a higher education institution should be accepted	This wording change is not supported. We do not consider this change to the modification to be necessary as the modification was proposed to ensure part 4 of the policy is positively worded to respond to adjacent campus growth, be it operational or subject to an approved planning permission. More broadly, the purpose of Policy H8 seeks to ensure that the plan positively prepared to meet significant housing needs over the plan period, namely for family and affordable homes (which represent 59% and 53% of need respectively). Therefore, the policy seeks to ensure that in areas that experience over-concentration, new PBSA delivery is limited to opportunities for local campus growth. Such an approach should support existing and planned campuses to respond to their identified need for new accommodation. We consider our evidence of considerable planned PBSA delivery and identified need for general needs housing, justifies a more stringent approach to nominations agreements than Policy H15 of the London Plan (see EWS030,

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				where a nominations agreement is not commercially viable. They also consider that written correspondence should be sufficient evidence of institutional support and that higher education institutions should not be expected to attend pre-application meetings.	Q6.7d response). This ensures the Plan is positively prepared and in general conformity with the London Plan. The comment related to implementation text requirements does not relate to a proposed Main Modification. The Council's position on this matter is set out in H8: Purpose-build Student Accommodation Topic Paper 2025 (TP003, paragraph 6.3.5) The Council is satisfied that the plan remains sound without the proposed changes.
MM58	H8 Purpose-built student accommodation	MMC-E-222	Ballymore Group	Welcomes the amendments to Policy H8, which they consider provide greater support for PBSA in appropriate and accessible locations across the Borough. The respondent objects to the proposed definition of “over-concentration”, particularly the threshold of 800 student beds within a 300m radius. They consider this threshold to be arbitrary and not justified by a robust evidence base. Suggests greater flexibility for PBSA where it forms part of wider residential-led redevelopment schemes. They consider this would more effectively reflect the London Plan’s mixed-use approach and support viability, accelerate delivery, and contribute to mixed and balanced communities, particularly on large strategic sites.	This wording change is not supported. We do not consider this change to the modification to be necessary as the modification was proposed in order to clarify how the policy will be implemented. The justification for setting out overconcentration thresholds is provided in the 'H8: Purpose-build Student Accommodation Topic Paper 2025 (TP003 - see 'Measuring over-concentration' sub-heading'). The overconcentration thresholds seek to ensure that where PBSA delivery meets wider London needs, that these developments do not significantly reduce available land for general needs housing in the immediate local area. Continuing to support PBSA, either standalone or as part of mixed-use developments, in areas of over-concentration risks overproviding PBSA bedspaces above need and further reduces available land for general needs homes. Therefore, the policy seeks to ensure that in areas that experience over-concentration, new PBSA delivery is limited to opportunities for local campus growth. This ensures the Plan is: - positively prepared to balance the needs of students and residents requiring general needs housing; - Justified as discussed through TP003; - Effective in ensuring housing delivery to meet pressing housing needs over the plan period is not undermined; and - In general conformity with the London Plan and NPPF overarching objectives of good growth and meeting identified housing need. The Council is satisfied that the plan remains sound without the proposed changes.
MM58	H8 Purpose-built student accommodation	MMC-E-222	Ballymore Group	The respondent objects to the proposed threshold of 800 student beds within a 300m radius. They consider it arbitrary, unsupported by a clear evidence base, and capable of creating unreasonable outcomes in areas of significant growth and regeneration. They also consider the use of “and/or” creates uncertainty about how the over-concentration test should be applied. The respondent recommends assessing over-concentration	This wording change is not supported. We do not consider this change to the modification to be necessary as the modification was proposed in order to clarify how the policy will be implemented. The justification for setting out overconcentration thresholds is provided in the 'H8: Purpose-build Student Accommodation Topic Paper 2025 (TP003 - see 'Measuring over-concentration' sub-heading'). The overconcentration thresholds seek to ensure that where PBSA delivery meets wider London needs, that these developments do not significantly reduce available land for general needs

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				primarily within the wider neighbourhood context rather than through a fixed numerical threshold. They also seek clearer drafting and propose replacing “and/or” with “or”. They recommend amending the supporting text to: "Over-concentration may occur where either: • over 25 per cent of net residential approvals and completions over the plan period are delivered as purpose-built student accommodation within a neighbourhood; or • a proposal would lead to a concentration of student accommodation that demonstrably undermines the delivery of a mixed and balanced community, having regard to the scale of existing and planned residential development in the surrounding area."	housing in the immediate local area. This ensures the Plan is positively prepared to balance the needs of students and residents requiring general needs housing. The use of "and/or" also reflects the policy intention for overconcentration to be triggered where one or both of the criteria are met. The Council is satisfied that the plan remains sound without the proposed changes.
MM58	H8 Purpose-built student accommodation	MMC-E-091	Impact Partnership Joint Venture (previously IQL Office LP)	The respondent objects to MM58 and the boroughwide PBSA overconcentration monitoring criterion that restricts new PBSA where it would result in more than 800 student beds within 300m of a site. They argue that this is a rigid and mechanistic approach that does not reflect differences in character, density, accessibility, growth ambitions and student demand across the borough. They consider the criterion to conflict with the spatial strategy of the London Plan and the draft Local Plan, which direct significant growth, higher-density development and PBSA towards Stratford Metropolitan Centre, the Olympic Legacy Opportunity Area and the SM Neighbourhood. The respondent states that Stratford contains a cluster of higher education institutions and has a particularly high demand for student accommodation. They cite evidence (an appended Knight Frank PBSA Demand and Market Assessment) that there are almost 30,000 full-time students living in the borough with bed ratio of 6.7 and forecast further growth associated with university expansion, particularly in Stratford and Maryland. They argue that the criterion would make PBSA development in the most suitable and sustainable locations difficult or undeliverable, even where schemes are adjacent to university campuses. They highlight planned growth at local higher education institutions and argue that PBSA is most appropriately located close to campuses and in highly accessible metropolitan centre locations, consistent with London Plan policy and guidance. They also object on the basis that the criterion would prevent proposals being assessed on their individual merits, including mixed-use schemes where PBSA could support the viability of conventional and affordable housing delivery and reduce pressure on the private rented sector and family housing stock. The respondent considers the policy approach to be unsound, arguing that it is not positively prepared, not justified by the	This wording change is not supported. We do not consider this change to the modification to be necessary as the modification was proposed in order to clarify how the policy will be implemented. The justification for setting out overconcentration thresholds is provided in the 'H8: Purpose-build Student Accommodation Topic Paper 2025 (TP003 - see 'Measuring over-concentration' sub-heading'). The topic paper also provides information as to the PBSA pipeline to student bedspace ratio (see paragraph 4.5). The overconcentration thresholds seek to ensure that where PBSA delivery meets wider London needs, that these developments do not significantly reduce available land for general needs housing in the immediate local area. Note separate policy requirements are required for the Stratford and Maryland neighbourhood under part 1 of the policy. Continuing to support PBSA, either standalone or as part of mixed-use developments, in areas of over-concentration risks overproviding PBSA bedspaces above need and further reduces available land for general needs homes. Therefore, the policy seeks to ensure that in areas that experience over-concentration, new PBSA delivery is limited to opportunities for local campus growth. Such an approach will support existing and planned campuses to respond to their identified need for new accommodation (even in Stratford and Maryland and over-concentrated locations), thereby reducing pressure on the private rented sector. This ensures the Plan is: - positively prepared to balance the needs of students and residents requiring general needs housing; - Justified as discussed through TP003; - Effective in ensuring housing delivery to meet pressing housing needs over the plan period is not undermined; and - In general conformity with the London Plan and NPPF overarching objectives of good growth and meeting identified housing need. The Council is satisfied that the plan remains sound without the proposed changes.

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				available evidence and not consistent with national policy or strategic policies in the London Plan. They specifically state that the approach conflicts with the NPPF requirement for plans to be positively prepared and deliverable. Suggests the following changes to H8 ALL Implementation text modifications (in red). This includes a recommended change and an alternative wording change if the recommended change is not accepted <u>Recommended Change</u> This policy will seek to monitor over-saturationconcentration of student bed spaces in each neighbourhood. For the purposes of this policy, over-saturationconcentration of purpose built student accommodation in a neighbourhood or resulting from a development is considered to be: • over 25 per cent of net residential approvals and completions over the plan period being delivered as purpose built student accommodation in a neighbourhood; and/or • 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. <u>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.</u> <u>For the purposes of this policy only, adjacent to is defined as 'being within 300 metres of'.</u> <u>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'.</u> <u>Alternative Change if Recommended Change not Accepted</u> This policy will seek to monitor over-saturationconcentration of student bed spaces in each neighbourhood. For the purposes of this policy, over-saturationconcentration of purpose built student accommodation in a neighbourhood or resulting from a development is considered to be: • over 25 per cent of net residential approvals and completions over the plan period being delivered as purpose built student accommodation in a neighbourhood; and/or • a proposal would lead to over 800 beds of student housing,	

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				<u>including existing or approved purpose built student accommodation sites</u>, being located within a radius of 300 metres from <u>the proposal site</u> an existing purpose built student accommodation site or approved development. <u>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.</u> Where proposals positively achieve the first criteria but fail the second, other policy considerations should be taken into account, such as strategic growth policies, designations, proximity to clusters of HEI and other benefits arising from the scheme, including affordable housing. <u>For the purposes of this policy only, adjacent to is defined as 'being within 300 metres of'.</u> <u>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'.</u>	
MM58	H8 Purpose-built student accommodation	MMC-E-295	Telford Living	Concerns are raised about the lack of justification for the 300m distance criterion when considered against London plan expectations and the reliance on dated appeal decisions.	This wording change is not supported. We do not consider this change to the modification to be necessary as the modification was proposed in order to clarify how the policy will be implemented. The justification for setting out overconcentration thresholds is provided in the 'H8: Purpose-build Student Accommodation Topic Paper 2025 (TP003 - see 'Measuring over-concentration' sub-heading'). The overconcentration thresholds seek to ensure that where PBSA delivery meets wider London needs, that these developments do not significantly reduce available land for general needs housing in the immediate local area. This ensures the Plan is positively prepared to balance the needs of students and residents requiring general needs housing. The Council is satisfied that the plan remains sound without the proposed changes.
MM58	H8 Purpose-built student accommodation	MMC-C-100	Watkin Jones	Suggests the Council should provide evidence of how the use of 800 beds and 300m have been determined. The respondent suggests there is no evidence of saturation to date.	This wording change is not supported. We do not consider this change to the modification to be necessary as the modification was proposed in order to clarify how the policy will be implemented. The justification for setting out overconcentration thresholds is provided in the 'H8: Purpose-build Student Accommodation Topic Paper 2025 (TP003 - see 'Measuring over-concentration' sub-heading'). The overconcentration thresholds seek to ensure that where PBSA delivery meets wider London needs, that these developments do not significantly reduce available land for general needs housing in the immediate local area.

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					This ensures the Plan is positively prepared to balance the needs of students and residents requiring general needs housing. The Council is satisfied that the plan remains sound without the proposed changes.
MM59	H9 HMOs and Large-Scale Purpose-Built Shared Living	MMC-E-222	Ballymore Group	The respondent is concerned that the current drafting could introduce fixed or implicit affordable housing contribution requirements, or be interpreted in a way that departs from the flexible, threshold-based approach set out in the London Plan. The respondent recommends that the Large-scale Purpose-built Shared Living policy aligns clearly with the London Plan approach to affordable housing contributions and viability, to ensure internal consistency and effectiveness. They consider that policies should avoid fixed or assumed levels of provision and instead allow for site-specific viability considerations, constraints and future policy changes (strategic or national). The respondent highlights the Support for Housebuilding London Plan Guidance and the ongoing London Plan review as reasons why policy flexibility and consistency are important.	This wording change is not supported. We do not consider this change to the modification to be necessary as the modification was proposed in order to bring the affordable housing target more closely in line with the plans revised strategic affordable housing target. This ensures the Plan is justified and positively prepared to meet need. Requiring a higher level of affordable housing than the 50% strategic target under H9.3b reflects that cash in lieu payments do not accord with the objectives of Policy H4, which seeks to deliver a mix and balance of housing types and sizes. Therefore, higher cash in lieu contributions reflect that developments which are unable to provide on-site affordable housing are likely to have higher sales/rent values than developments delivering affordable homes on site, and that there is an onus on the Council to deliver these affordable homes to make up for this shortfall. This ensures the Plan is justified and positively prepared in seeking to meet identified need for affordable housing. The policy is also effective in allowing for the submission of viability information where this target cannot be met. The Council is satisfied that the plan remains sound without the proposed changes.
MM60	H9 HMOs and Large-Scale Purpose-Built Shared Living	MMC-C-100	Watkin Jones	The respondent supports affordable housing contributions for LSPBSL rather than treating it in the same way as conventional C3 housing. The respondent objects to the use of an affordable housing policy designed for traditional C3 dwellings in relation to PBSA. They consider there is no evidence to justify an alternative approach. Suggests that the Council adopt the London Plan Policy H16 approach for LSPBSL. They suggest requiring affordable housing contributions equivalent to 35% of units, or 50% on public sector or appropriate industrial land, to ensure the policy is sound.	This wording change is not supported. We do not consider this change to the modification to be necessary as the modification was proposed in order to bring the affordable housing target more closely in line with the plans revised strategic affordable housing target, as well as clarify the assessment of mixed tenure schemes. This ensures the Plan is justified and positively prepared to meet need. Requiring a higher level of affordable housing than the 50% strategic target under H9.3b reflects that cash in lieu payments do not accord with the objectives of Policy H4, which seeks to deliver a mix and balance of housing types and sizes. Therefore, higher cash in lieu contributions reflect that developments which are unable to provide on-site affordable housing are likely to have higher sales/rent values than developments delivering affordable homes on site, and that there is an onus on the Council to deliver these affordable homes to make up for this shortfall. Additional clarification provided in the implementation text in relation to mixed tenure schemes incorporating build for sale housing is justified, noting the priority of the Local and London Plan to deliver on site affordable housing. This ensures the Plan is justified and positively prepared in seeking to meet identified need for affordable housing. The policy is also effective in allowing for the submission of viability information where this target cannot be met.

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					The Council is satisfied that the plan remains sound without the proposed changes.
MM61	H9 HMOs and Large-Scale Purpose-Built Shared Living	MMC-C-100	Watkin Jones	The respondent objects to the retention of this element of the policy. They consider it is unnecessary because ancillary facilities such as shared workspaces and laundries are a dedicated part of the residential model. They argue that public access could reduce capacity and create safety and management issues for residents. The respondent recommends deleting this part of the policy as it is no longer relevant given the updates to the supporting text. Alternatively, they suggest replacing the word “within” with “alongside” and deleting the words “and if the facilities are publicly accessible”.	This wording change is not supported. We do not consider any further modifications to the Plan to be necessary as the modification was proposed in order to improve the effectiveness of the policy, ensuring it is proportionate to the nature of facilities proposed. We consider that where wider community benefits can be secured from new high density development (e.g. enhanced access to community spaces or commercial uses), this can help to foster good growth objectives, in particular those promoted through policy GG3 of the London Plan (Creating a healthy city). The Council is satisfied that the plan remains sound without the proposed changes.
MM62	H10 Gypsy and Traveller Accommodation	MMC-E-015	Greater London Authority	Welcome the changes to MM62, which reflects the wording agreed in the SoCG between the GLA and LBN.	Support noted.
MM64	H11 Housing Design Quality	MMC-E-034	Unite Students	The respondent supports Main Modification MM64 in principle. They state that this reflects the adopted London Plan Guidance and better aligns with how accessible accommodation needs are evidenced and delivered. The respondent also considers that MM64 does not go far enough. They argue that evidence from their own student accommodation portfolio shows very low demand for accessible rooms and that higher requirements could lead to over-provision. They also note that the Towards a New London Plan consultation recognised that determining the appropriate level of need for accessible PBSA can be difficult and may lead to over-provision. They contend that their practice of adapting rooms to meet individual students' needs is a more effective approach. The respondent suggests further amending Policy H11 to reduce the accessible accommodation requirement for PBSA and align it with Part M Volume 2 of the Building Regulations. They consider this amendment would make the policy justified and effective by delivering the level of accessible accommodation needed without resulting in over-provision. They propose the following wording amendment (in red): 3e. Purpose-built student accommodation should provide accessible student accommodation in accordance having regards to Part M Volume 2 paragraph 4.24 part g. London Plan Guidance: Purpose-built Student Accommodation (October 2024) and local evidence of need. The 5% requirement should be split into 1% fitted out wheelchair accessible rooms and 4% easily adaptable rooms.	This wording change is not supported. We do not consider this change to the modification to be necessary as the modification was proposed in order to bring the policy requirement into general conformity with the London Plan and associated Purpose-built Student Accommodation London Plan Guidance. The Council is satisfied that the plan remains sound without the proposed changes.

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
MM64	H11 Housing Design Quality	MMC-E-191	University College London	Welcome the alignment of Policy H11, Part 3 (e) with London Plan Guidance in relation to accessible PBSA.	Support noted.
Additional Modifications					
AM76	H3 Affordable housing	MMC-E-195	Berkeley Group	Object to the wording of AM76 because it places emphasis on the Fast Track Route under London Plan Policy H5 without expressly recognising the Viability Tested Route as an equally valid delivery mechanism for affordable housing. Suggest amending AM76 to give equal weight to both affordable housing routes under London Plan Policy H5. The respondent refers to concerns raised during the examination that a rigid application of affordable housing requirements could affect development viability and delivery. They note that these issues are recognised in part through Policy H4.5 implementation text.	This wording change is not supported. We do not consider this change to the modification to be necessary as the modification was proposed in order to bring the plan into general conformity with the London Plan. We do not agree that the policy wording or supporting text give less weight to the viability tested route. The Council is satisfied that the plan remains sound without the proposed changes.
AM78	H4 Housing mix	MMC-E-196	Berkeley Group	Suggest amending AM78 to reflect their comments on MM53. Suggest that, if the 15% requirement is retained, the policy should allow flexibility having regard to location, accessibility, site context, design, capacity, viability and deliverability.	This wording change is not supported. We do not consider this change to the modification to be necessary as the modification was proposed in order to ensure the four bedroom target remains aligned with evidence of identified need as set out in the Strategic Housing Market Assessment (EB056, Figure 48). The higher percentage required reflects the fact that family housing is now only sought in the social rent tenure (i.e. the 4 bed target represents a larger proportion of the overall family housing requirement). This level of provision was reflected in the housing mix scenarios tested in the London Borough of Newham Local Plan Regulation 19 viability report (EB099). With regards to implementation, the policy requirement is not subject to viability testing in the same way as H4.2, ensuring the policy is effective and responsive individual site circumstance. This ensures the Plan is justified and effective, while also being responsive to London Plan Policy GG4's requirement to provide for identified housing needs. The Council is satisfied that the plan remains sound without the proposed changes.

8. Green and Water Spaces

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
Main Modifications					
MM67	GWS1 Green spaces	MMC-E-195	Berkeley Group	Object to MM67 as currently drafted as it could unintentionally constrain allocated sites where redevelopment, reconfiguration or the release of green space has already been assessed and justified through the Local Plan process. Suggest amending MM67 to make clear that the policy should not be applied rigidly to site allocations that include existing green space. Note that this particularly important for allocation N13.SA3, where the proposed release of Metropolitan Open Land (MOL) and the reconfiguration of green space are key elements of the site allocation and related Policies Map modifications. Note the proposed change to MM67 should be read alongside the suggested changes to PM25 and PM26.	This wording change is not supported. We do not consider a change to MM67 to be necessary as the modification was proposed as a clarification to improve the flexibility of the policy while also mitigating the loss of green space. This modification was set out in the Schedule of Proposed Main Modifications to Matters 1 to 16 (Colour coded) v5 (FMO94, in ED020c). Policy GWS1 applies to all designated green space, including green space within site allocations. The representation conflates the green space designation within site allocation N13.SA3 with the retained Metropolitan Open Land (MOL) designation. No reconfiguration or release of land designated as green space is proposed within site allocation N13.SA3, other than a correction to the green space designation to accurately reflect the extent of the Previously Developed Land (PDL). Introducing an exemption for site allocations containing green space would weaken the effectiveness of Policy GWS1 and create uncertainty regarding the protection of green space elsewhere in the borough. The current wording provides a clear and consistent approach that aligns with the Plan's spatial strategy and the proposed site allocations. The Council is satisfied that the plan remains sound without the proposed changes.
MM70	GWS2 Water spaces	MMC-E-238	Environment Agency	Modification supported. However suggest deleting the word “generally” from Policy GWS2.part d so that the wording reads “requiring no encroachment...”. The respondent considers this would strengthen the policy wording.	Support noted. This wording change is not supported. We do not consider this change to the MM70 to be necessary as the inclusion of the word 'generally' was proposed in response to Action Point AP57 (ED028). Following the hearing session held on 4 February 2026 during Week 4 of the Examination, the Inspector directed the Council to consider whether Policy GWS2, and the proposed modification, should be amended to ensure consistency with London Plan (2021) Policy SI17 part D and paragraph 9.17.2 including in relation to permanently moored vessels in Newham's docks. MM70 reflects the wording published in the Council's response to Action Point AP57, published in 'IN7: Action Points from Week 4 Hearing Sessions' (ED028). The modification was drafted to ensure conformity with London Plan Policy SI17 (2021). The Council is satisfied that the plan remains sound without the proposed changes.
MM71	GWS2 Water spaces	MMC-E-238	Environment Agency	Modification supported.	Support noted.

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
Policies Map					
PM23	GWS1 Green spaces	MMC-E-035	NewVic	Modification supported.	Support noted.
PM25	GWS1 Green spaces	MMC-E-195	Berkeley Group	Welcome PM25 insofar as it corrects the green space mapping to identify previously developed land within site allocation N13.SA3 (Former East Ham Gasworks). Object to PM25 because the amendment does not go far enough. Suggest the green space designation should be amended to align with the revised MOL boundary following the proposed de-designation of MOL at the site. Object to the proposed SINC designation across the whole site allocation, stating that the site is not currently a SINC, does not presently contain habitat of notable nature conservation value, and will require extensive remediation works that would remove much of the existing vegetation and habitats. Suggest amending or removing SINC designations where they overlap with land intended for redevelopment. Suggest identifying the non-developed parts of the site as a potential future SINC, secured through the redevelopment, habitat creation and long-term management of the site. Note that redevelopment of N13.SA3 depends on remediation of contamination and unexploded ordnance. The proposed SINC designation reflects future ecological enhancements rather than the site's current ecological value. Note that redevelopment would deliver biodiversity net gain, habitat improvements and enhanced public access. A plan was submitted in support of these comments.	Support noted. This mapping change is not supported. We do not consider this change to PM25 to be necessary as the green space designation at N13.SA3 (PM25) reflects Action Point AP56 (ED028) and the green space designation set out in ED20. The representation seeks a further amendment to the green space designation to align with the revised Metropolitan Open Land (MOL) boundary. However, the Council does not consider such a change to be justified. No reconfiguration or release of land designated as green space is proposed within site allocation N13.SA3, other than the correction made through PM25 to the green space designation to accurately reflect the extent of the Previously Developed Land (PDL). The Council notes that there is no objection to PM26 and the de-designated MOL. The Council's position on the Site of Importance for Nature Conservation (SINC) is set out in the Regulation 19 Consultation Report (Reg19-E-195/126a). The proposed SINC designation is supported by the Sites of Importance for Nature Conservation Review (2025) (EB070) and is based on the site in its current ecological value and function. As set out in the Council's Written Statement for Matter 12 (EW053), the Council considers the SINC designations shown on the Policies Map to be justified, consistent with national policy and in conformity with the London Plan. The Council therefore does not agree that the proposed SINC designation should be removed, reduced, or identified only as a future aspiration. The Council acknowledges that remediation and redevelopment proposals may affect existing habitats. Policy GWS3(6) applies the mitigation hierarchy to development proposals affecting Sites of Importance for Nature Conservation. This approach is in conformity with London Plan Policy G6 (2021) and ensures that biodiversity impacts are appropriately avoided, mitigated or compensated where necessary. The Council is satisfied that the Plan remains sound without the proposed changes.
PM26	GWS1 Green spaces	MMC-E-195	Berkeley Group	Welcome PM25 insofar as it corrects the green space mapping to identify previously developed land within site allocation N13.SA3 (Former East Ham Gasworks). Object to PM25 because the amendment does not go far enough. Suggest the green space designation should be amended to align with the revised MOL boundary following the proposed de-designation of MOL at the site.	Support noted. This mapping change is not supported. We do not consider this change to PM25 to be necessary as the green space designation at N13.SA3 (PM25) reflects Action Point AP56 (ED028) and the green space designation set out in ED20. The representation seeks a further amendment to the green space designation

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
				Object to the proposed SINC designation across the whole site allocation, stating that the site is not currently a SINC, does not presently contain habitat of notable nature conservation value, and will require extensive remediation works that would remove much of the existing vegetation and habitats. Suggest amending or removing SINC designations where they overlap with land intended for redevelopment. Suggest identifying the non-developed parts of the site as a potential future SINC, secured through the redevelopment, habitat creation and long-term management of the site. Note that redevelopment of N13.SA3 depends on remediation of contamination and unexploded ordnance. The proposed SINC designation reflects future ecological enhancements rather than the site's current ecological value. Note that redevelopment would deliver biodiversity net gain, habitat improvements and enhanced public access. A plan was submitted in support of these comments.	to align with the revised Metropolitan Open Land (MOL) boundary. However, the Council does not consider such a change to be justified. No reconfiguration or release of land designated as green space is proposed within site allocation N13.SA3, other than the correction made through PM25 to the green space designation to accurately reflect the extent of the Previously Developed Land (PDL). The Council notes that there is no objection to PM26 and the de-designated MOL. The Council's position on the Site of Importance for Nature Conservation (SINC) is set out in the Regulation 19 Consultation Report (Reg19-E-195/126a). The proposed SINC designation is supported by the Sites of Importance for Nature Conservation Review (2025) (EB070) and is based on the site in its current ecological value and function. As set out in the Council's Written Statement for Matter 12 (EW053), the Council considers the SINC designations shown on the Policies Map to be justified, consistent with national policy and in conformity with the London Plan. The Council therefore does not agree that the proposed SINC designation should be removed, reduced, or identified only as a future aspiration. The Council acknowledges that remediation and redevelopment proposals may affect existing habitats. Policy GWS3(6) applies the mitigation hierarchy to development proposals affecting Sites of Importance for Nature Conservation. This approach is in conformity with London Plan Policy G6 (2021) and ensures that biodiversity impacts are appropriately avoided, mitigated or compensated where necessary. The Council is satisfied that the Plan remains sound without the proposed changes.
PM34	GWS1 Green spaces	MMC-EC-183	London International Exhibition Centre Plc (ExCeL) and Mount Anvil	Welcome the changes made to the Policies Map since Regulation 19, noting that the proposed modifications are more consistent with the Regulation 18 Policies Map. Suggests that the Policies Map should more closely reflect the adopted Local Plan Policies Map and existing site conditions. Suggests that the Policies Maps should show only the three genuine green spaces and excluding the hardstanding between the pleached trees and the mound, as it functions as a pedestrian route rather than green space. This would improve accuracy and provide greater certainty for the delivery of the site allocation. Notes that the purpose of the Policies Map is to identify existing green spaces. Notes that an inaccurate green space designation could create uncertainty at the planning application stage and undermine delivery of the site allocation.	This mapping change is not supported. We do not consider this change to be necessary as PM34 was proposed in response to AP56 (ED028) and reflects the green space designation set out in ED20. The representation's concern regarding the inclusion of paths and other infrastructure within the Green Space designation is not supported. In response to Action Point AP72 (ED029) the Council prepared a modification to the definition of green space in the Plan that reflects the fact that not all parts of parks, woodlands, nature reserves, gardens, allotments, playing pitches, etc will necessarily be "vegetated". The definition of green space (M224) clarifies that green space may incorporate incidental built features, stating that: "Green space may incorporate incidental built features such as paths...". The presence of such features does not undermine the function, purpose or justification of the designation (ED029). The designation is supported by a robust and up-to-date local evidence base, primarily the Green and Water Infrastructure Strategy (GWIS), Newham (2025) [EB061 - EB067]. The Council is satisfied that the plan remains sound without the proposed changes.

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
PM34	GWS1 Green spaces	MMC-EC-183	London International Exhibition Centre Plc (ExCeL) and Mount Anvil	Objects to the amount of green space shown on the Policies Map. They do not consider it to be an accurate reflection of the existing situation or of what can reasonably be regarded as green space.	This mapping change is not supported. We do not consider this change to be necessary as PM34 was proposed in response to AP56 (ED028) and reflects the green space designation set out in ED20. The Council is satisfied that the plan remains sound without the proposed changes.
PM36	GWS1 Green spaces	MMC-E-033	Thames Water	Modification supported.	Support noted.
PM38	GWS1 Green spaces	MMC-E-296	Alan Cooper	Objects to PM38 as the proposed Metropolitan Open Land (MOL) boundary for West Ham Park does not include the former nursery site, which the respondent considers part of the park's full historic curtilage and Grade II registered park. Notes that excluding the site would weaken protection for an area vulnerable to development pressure. Suggests amending the MOL boundary to include the whole of West Ham Park, including the former nursery site. If the site is to be excluded, seeks clarification of the proposed designation for the former nursery site and justification for its exclusion from MOL. Notes that West Ham Park has previously been historically treated as a single entity under Policy GWS1 and refers to local opposition to development of the former nursery site.	This mapping change is not supported. We do not consider this change to the Policies Map to be necessary as PM38 was proposed in order to illustrate the proposed Metropolitan Land (MOL) designation at West Ham Park. The former nursery site lies outside the proposed MOL boundary. The Council considers the MOL designation, as proposed, to be justified and consistent with the supporting evidence base (EB068, EB069 and ED019a). The former West Ham Nursery site remains within the wider West Ham Park Green Space designation, as identified in the Regulation 19 Local Plan and subsequently through consultation on the Proposed Main Modifications. The Council is satisfied that the plan remains sound without the proposed changes.
PM38	GWS1 Green spaces	MMC-C-099	Dries Indestege	Objects to the proposed Metropolitan Open Land (MOL) boundary for West Ham Park on the basis that the former nursery site in the north-east corner of the park appears to be excluded from the designation. Notes that the former nursery site forms an integral part of West Ham Park, as identified within the Grade II Historic Park listing. Requests clarification of the proposed designation of the former nursery site if it is excluded from the MOL boundary and seeks justification for its exclusion from the proposed MOL designation.	This mapping change is not supported. We do not consider this change to the Policies Map to be necessary as PM38 was proposed in order to illustrate the proposed Metropolitan Land (MOL) designation at West Ham Park. The former nursery site lies outside the proposed MOL boundary. The Council considers the MOL designation, as proposed, to be justified and consistent with the supporting evidence base (EB068, EB069 and ED019a). The former West Ham Nursery site remains within the wider West Ham Park Green Space designation, as identified in the Regulation 19 Local Plan and subsequently through consultation on the Proposed Main Modifications. The Council is satisfied that the plan remains sound without the proposed changes.
PM38	Green and Water Spaces	MMC-C-101	Mr Julian Maurice-Williams	Objects to PM38 as the proposed Metropolitan Open Land (MOL) boundary for West Ham Park does not include the former nursery site, which the respondent considers part of the park's full historic curtilage and Grade II registered park. Notes that excluding the site would weaken protection for an area vulnerable to development pressure. Suggests amending the MOL boundary to include the whole of West Ham Park, including the former nursery site.	This mapping change is not supported. We do not consider this change to the Policies Map to be necessary as PM38 was proposed in order to illustrate the proposed Metropolitan Land (MOL) designation at West Ham Park. The former nursery site lies outside the proposed MOL boundary. The Council considers the MOL designation, as proposed, to be justified and consistent with the supporting evidence base (EB068, EB069 and ED019a). The former West Ham Nursery site remains within the wider West Ham Park Green Space designation, as identified in the Regulation 19 Local Plan and

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
				If the site is to be excluded, seeks clarification of the proposed designation for the former nursery site and justification for its exclusion from MOL. Notes that West Ham Park has previously been historically treated as a single entity under Policy GWS1 and refers to local opposition to development of the former nursery site.	subsequently through consultation on the Proposed Main Modifications. The Council is satisfied that the plan remains sound without the proposed changes.
PM38	Green and Water Spaces	MMC-C-098	Nicky Brown	Notes that PM38 is not clear as to whether the whole curtilage of West Ham Park, including the former nursery and as defined by its Grade II Historic Park listing, is designated as Metropolitan Open Land (MOL). Requests clarification on the proposed designation of the former nursery site if it is excluded from the MOL designation. If the site is excluded, seeks clarification of its proposed designation within the Local Plan and the justification for both its exclusion from MOL and the alternative designation. Notes that previous Local Plan documentation has treated the whole curtilage of West Ham Park as a single entity and designated it as Green Space under Policy GWS1.	Comment noted. PM38 was proposed in order to illustrate the proposed Metropolitan Land (MOL) designation at West Ham Park. The former nursery site lies outside the proposed MOL boundary. The Council considers the MOL designation, as proposed, to be justified and consistent with the supporting evidence base (EB068, EB069 and ED019a). The former West Ham Nursery site remains within the wider West Ham Park Green Space designation, as identified in the Regulation 19 Local Plan and subsequently through consultation on the Proposed Main Modifications. The Council is satisfied that the plan remains sound without the proposed changes.
PM38	Green and Water Spaces	MMC-C-008	Roger Jones, Friends of West Ham Park	Notes that PM38 is not clear as to whether the whole curtilage of West Ham Park, including the former nursery and as defined by its Grade II Historic Park listing, is designated as Metropolitan Open Land (MOL). Requests clarification on the proposed designation of the former nursery site if it is excluded from the MOL designation. If the site is excluded, seeks clarification of its proposed designation within the Local Plan and the justification for both its exclusion from MOL and the alternative designation. Notes that previous Local Plan documentation has treated the whole curtilage of West Ham Park as a single entity and designated it as Green Space under Policy GWS1.	Comment noted. PM38 was proposed in order to illustrate the proposed Metropolitan Land (MOL) designation at West Ham Park. The former nursery site lies outside the proposed MOL boundary. The Council considers the MOL designation, as proposed, to be justified and consistent with the supporting evidence base (EB068, EB069 and ED019a). The former West Ham Nursery site remains within the wider West Ham Park Green Space designation, as identified in the Regulation 19 Local Plan and subsequently through consultation on the Proposed Main Modifications. The Council is satisfied that the plan remains sound without the proposed changes.
Comments not specific to Main Modifications					
N/A	GWS1 Green spaces	MMC-E-195	Berkeley Group	Object to the proposed SINC designation at N17.SA1 Beckton Riverside. Considers that the designation overlaps with land allocated for development and creates unnecessary policy conflict. Notes that a SINC should reflect existing ecological value rather than biodiversity enhancements that will be delivered through development. Suggest amending the Policies Map so that any SINC designation is limited to land where it is justified, or identified as a	This comment does not relate to a proposed Policies Map Modification. The Council does not agree that amendments to the proposed Sites of Importance for Nature Conservation (SINC) designations within site allocation N17.SA1 are required. The Council's position on this matter is set out in the Regulation 19 consultation Report (Reg19-E195/139 and Reg19-E195/145). The proposed SINC designations are justified by Newham's Sites of Importance for Nature Conservation Review (2025) (EB070) and are based on the site's

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
				future designation to be confirmed after remediation and ecological enhancements have been delivered. Considers this issue to be the same as the concerns regarding PM25 and N13.SA3 East Ham Gasworks. A map has been provided to support the representation.	current condition. As set out in the Council's Written Statement for Matter 12 (EW053), the Council considers the SINC designations shown on the Policies Map to be justified, consistent with national policy and in conformity with the London Plan. In addition, Policy GWS3, Part 6 applies the mitigation hierarchy to development proposals affecting SINCS, in conformity with London Plan Policy G6 (2021), ensuring that biodiversity impacts are appropriately avoided, mitigated or compensated where necessary. The Council therefore does not support the removal, reduction or deferral of the proposed SINC designations. The Council is satisfied that the Plan remains sound without the proposed changes.
N/A	GWS2 Water spaces	MMC-E-293	Marine Management Organisation	Suggest the Council has regard to the relevant policies within the South East Marine Plan where proposals may affect the marine environment. Recommends including reference to the South East Marine Plan, particularly in relation to tidal and marine issues. Notes that this would help demonstrate regard to marine planning requirements and support decision-making. Notes that Marine Plan policies should not be considered in isolation and that a whole-plan approach should be taken. Offer further advice on the implementation of the Marine Plan if required.	Support noted. This comment does not relate to a proposed Main Modification. It is not considered that further guidance on the implementation of this policy is required. The Council will keep this under review.
N/A	GWS2 Water spaces	MMC-E-293	Marine Management Organisation	Welcomes the reference to the South East Marine Plan in the Green and Water Spaces section of the Local Plan. Suggests the Council references the South East Marine Plan and marine licensing requirements in the Local Plan. Recommends having regard to relevant marine plan policies and objectives, including water quality, biodiversity, seascape, climate change, heritage, infrastructure and renewable energy. Signposts the Council to MMO guidance and related planning resources. Notes the role of the Marine Management Organisation (MMO), the requirement for marine licences for certain activities, and that decisions affecting the marine area should accord with the Marine and Coastal Access Act 2009 and relevant marine plans. Notes that marine plan policies should be considered as part of a whole-plan approach.	Support noted. This comment does not relate to a proposed Main Modification. It is not considered that further guidance on the implementation of this policy is required. The Council will keep this under review.
N/A	GWS2 Water spaces	MMC-E-293	Marine Management Organisation	The Marine Management Organisation (MMO) provides a standard response setting out its role and responsibilities in marine planning, marine licensing and fisheries management. Notes that local planning authorities should have regard to relevant marine plans and the UK Marine Policy Statement when preparing local plans and determining development proposals that may affect the marine area. Notes the overlap between marine and terrestrial planning regimes, the need to consider marine licensing requirements where relevant, and the availability of MMO guidance and support. No site-specific comments or objections to the Local Plan modifications are made.	Support noted. This comment does not relate to a proposed Main Modification. It is not considered that further guidance on the implementation of this policy is required. The Council will keep this under review.

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
N/A	GWS1 Green spaces	MMC-E-033	Thames Water	Object to the absence of changes to the Local Plan in response to Thames Water's previous representations. Thames Water seeks the deletion of Metropolitan Open Land (MOL) at Northern Lagoon, Beckton Sewage Treatment Works (STW), and the deletion of the Green Space designation at Mill Meads Allotments – Abbey Mills Sewage Pumping Station.	This comment does not relate to a proposed Policies Map Modification. The Council does not agree that amendments to the Metropolitan Open Land (MOL) designation at Beckton Sewage Treatment Works or the Green Space designation at Mill Meads Allotments are required. The Council's position on these matters is set out in the Regulation 18 Consultation Report (Reg18-E-028/022, Reg18-E-028/023, Reg18-E-028/025, Reg18-E-028/026, Reg18-E-028/027, Reg18-E-028/028, Reg18-E-028/029, Reg18-E-028/030, Reg18-E-028/034) and the Regulation 19 Consultation Report (Reg19-E-033/012, Reg19-E-033/014, Reg19-E-033/016). As set out in the Council's Written Statement for Matter 12 (EWS053), the Council considers the MOL and Green Space designations shown on the Policies Map to be justified, consistent with national policy and in conformity with the London Plan, having regard to the supporting evidence base (Newham MOL Review: EB068, EB069 and ED019a and Newham's Green and Water Infrastructure Strategy (2025) (EB061–EB067). The Council is satisfied that the Plan remains sound without the proposed changes.

9. Climate Emergency

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
Main Modifications					
MM74	CE2 Zero Carbon development	MMC-C-096	NHS Property Services (NHSPS) Limited	Welcome the proposed Main Modifications MM15, MM36-37, MM52 and MM74-77. NHS Property Services (NHSPS) supports these modifications, noting that they do not materially change the wording of policies it previously supported at Regulation 19 stage.	Support noted.
MM74	CE2 Zero Carbon development	MMC-E-034	Unite Students	Welcome Main Modification MM74. Unite supports the revised Energy Use Intensity (EUI) target for PBSA, considering it a more appropriate and evidence-based measure for student accommodation. Unite considers the previous target was not viability tested for PBSA, was not based on PBSA-specific evidence, could have created unviable requirements and undesirable design outcomes, and was inconsistent with national policy.	Support noted. The rationale for Main Modification MM74 is set out on page 4 of LBN response to Action Points from week 4 (ED028). LBN Local Plan EiP-Etude-Additional Summary (ED028a) provides evidence to support this modification. The rationale behind Policy CE2.3 is also set out on pages 3-7 of the Matter 11 Response (EWS050).
MM75	CE2 Zero Carbon development	MMC-E-034	Unite Students	Object to Policy CE2 Part 4. Unite considers the renewable energy generation requirements are overly prescriptive, lack sufficient evidence, have not been demonstrated to be viable for PBSA and high-density developments, and are inconsistent with national policy. Suggest removing the fixed renewable energy generation targets based on building footprint. Instead, the policy should encourage on-site renewable energy generation where technically feasible and allow off-site or low-carbon energy supply where justified. Unite argues that the current approach may disadvantage taller and more efficient building forms, misrepresent the performance of PBSA, and conflict with national policy and Building Regulations. While it acknowledges that Main Modification MM75 partly addresses concerns by introducing separate targets for buildings above and below 21 metres in height, it considers that concerns regarding viability, evidence and policy compliance remain unresolved. Unite's suggested amendments are shown below: 4. New development should generate renewable energy on site where technically feasible. Off-site or low-carbon energy supply should also be supported where justified. to a level equivalent to, or in excess of, the predicted annual energy demand of the building, in accordance with the following requirements: a. As a minimum, the amount of energy generated in a year must be: i. at least 120 kWh/m2 per building footprint per annum for industrial buildings; and ii. at least 80 kWh/m2 per building footprint per annum for all	This wording change is not supported. We do not consider this change to the modification to be necessary as the modification was proposed following discussions on day 10 of the hearing sessions regarding the technical feasibility and financial viability of the policy. The rationale for Main Modification MM75 is set out on page 5 of LBN response to Action Points from week 4 (ED028). LBN Local Plan EiP-Etude-Additional Summary (ED028a) provides evidence to support this modification. The rationale behind Policy CE2.4 is also set out on page 12 of the Matter 11 Response (EWS050). This ensures the Plan is justified and effective.

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
				building types except industrial buildings that are under 21 metres in height; and iii. iii. at least 50 kWh/m² per building footprint per annum for all building types except industrial buildings that are over 21 metres in height	
MM77	CE2 Zero Carbon development	MMC-E-016	Kika Everington	Object to Main Modification MM77. The respondent considers the wording unsound and not legally compliant because the term “effective” is undefined and the policy does not require independent scrutiny or transparency. They are concerned this could allow unsuitable decarbonisation strategies to be approved. Suggest replacing the wording with that proposed in their Regulation 19 representation. If this is not possible, they recommend: Defining “effective”. Requiring independent scrutiny of decarbonisation strategies by a body commissioned by the Council. Requiring the scrutiny process to be transparent and open to public comment. The respondent is concerned that influence from the LLDC and the heat network operator could result in approval of strategies that do not deliver carbon reductions quickly enough to meet mandatory targets.	This wording change is not supported. We do not consider this change to the modification to be necessary as the modification was proposed following discussions on day 10 of the hearing sessions regarding heat networks, and the direction of the Inspector in Action Point 47 (IN12). The rationale behind Policy CE2.2 is also set out on page 11 of the Matter 11 Response (EWS050). This ensures the Plan is justified and effective.
MM77	CE2 Zero Carbon development	MMC-E-217	London Legacy Development Corporation	Welcome modification MM77 to Policy CE2 Implementation 2. LLDC supports the proposed wording as it allows development to connect to heat networks where a decarbonisation strategy is in place.	Support noted.
MM78	CE3 Embodied Carbon	MMC-E-034	Unite Students	Welcome Main Modification MM78, which increases the embodied carbon limit from 500kg CO₂/m² to 700kg CO₂/m². Unite supports this change as it considers the previous target was not justified. Object to the continued use of a mandatory embodied carbon limit. Unite argues that the target is not supported by evidence relating to PBSA, is not consistent with the London Plan approach, and could affect the viability of high-density student accommodation developments. Suggest requiring whole-life carbon assessments using the RICS Whole Life Carbon Assessment methodology, treating the 700kg CO₂/m² figure as an aspirational benchmark rather than a mandatory cap, and introducing PBSA-specific embodied carbon expectations. Unite considers the evidence base relies on building typologies that are not comparable to high-density PBSA developments. It also argues that PBSA has different embodied carbon characteristics due to its density and building form, and that the policy does not adequately reflect these differences.	This wording change is not supported. We do not consider this change to the modification to be necessary as the modification was proposed following discussions on day 10 of the hearing sessions regarding the technical feasibility and financial viability of the policy. The rationale for Main Modification MM75 is set out on page 6 of LBN response to Action Points from week 4 (ED028). LBN Local Plan EiP-Etude-Additional Summary (ED028a) provides evidence to support this modification. The rationale behind Policy CE3 is also set out on page 15 and 16 of the Matter 11 Response (EWS050). This ensures the Plan is justified and effective.

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
				Unite's suggested amendments are shown in red below: 6. Whole-life carbon should be assessed using RICS WLCA v2 and major developments (excluding PBSA) are expected to meet embodied carbon limits of less than 700kg CO2/m2 whilst major PBSA development should aim to meet embodied carbon limits of less than XX CO2/m2.	
MM79	CE7 Managing flood risk	MMC-E-238	Environment Agency	Supports the main modifications to CE7	Support noted.
MM80	CE7 Managing flood risk	MMC-E-238	Environment Agency	Supports the main modifications to CE7	Support noted.
MM81	CE7 Managing flood risk	MMC-E-238	Environment Agency	Supports the main modifications to CE7	Support noted.
MM82	CE7 Managing flood risk	MMC-E-238	Environment Agency	Supports the main modifications to CE7	Support noted.
MM83	CE7 Managing flood risk	MMC-E-238	Environment Agency	Welcomes the main modifications to CE7	Support noted.
MM84	CE7 Managing flood risk	MMC-E-238	Environment Agency	Welcome the proposed main modification. The respondent supports the clarification that no sleeping accommodation will be permitted below the tidal breach flood level.	Support noted.
MM85	CE7 Managing flood risk	MMC-E-238	Environment Agency	Supports the main modifications to CE7	Support noted.
Comments not specific to Main Modifications					
N/A	CE1 Environmental design and delivery	MMC-E-033	Thames Water	Object to the Local Plan not being amended to reflect Thames Water's Regulation 19 representations relating to Policy CE1: Environmental Design & Delivery – Water Efficiency.	This comment does not relate to a proposed Main Modification. The Council's position on this matter is set out on page 73 of the Regulation 22 Statement Consultation Report (SD017), as well as on page 2 of the Matter 11 Response (EWS050).
N/A	CE2 Zero Carbon development	MMC-E-034	Unite Students	Object to Policy CE2 Part 1. Unite considers the proposed space heating demand standard for PBSA is not justified by evidence, has not been viability tested for student accommodation, and is inconsistent with national policy. Suggest introducing a separate, evidence-based space heating demand standard for PBSA that reflects the specific characteristics of student accommodation and aligns with emerging national standards. Unite's suggested amendments are shown below: 1. New development should be designed and constructed to be Net Zero Carbon in operation, using as little energy as possible to heat a building over a year, and meeting the following standards: a. All new residential units should achieve a space heating demand of less than 20 kWh/m2 GIA/yr. b. All new PBSA developments should achieve a space heating demand of less than XX kWh/m2 GIA/yr. c. All new non-domestic buildings except industrial buildings should achieve a space heating demand of less than 20 kWh/m2 GIA/yr. d. All new industrial buildings should achieve a space heating	This comment does not relate to a proposed Main Modification. The Council's position on this matter is set out on pages 3-6 to the Matter 11 Response (EWS050). During day 10 of the hearing sessions, the Council explained that the UKNZCBS sets a more stringent space heating demand than the Council is proposing.

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
				demand of less than 15 kWh/m2 GIA/yr. e. All other development is encouraged to use as little energy as possible to heat the building.	
N/A	CE2 Zero Carbon development	MMC-E-034	Unite Students	Object to Policy CE2 Part 5. Unite considers the monitoring requirements are inconsistent with national policy and are unworkable for PBSA because they rely on total energy use, including energy consumption that is driven by occupier behaviour and is outside a developer's control. Suggest limiting monitoring requirements to regulated energy use only, aligning reporting requirements with the UK Net Zero Carbon Buildings Standard, and clarifying that developers should not be penalised for tenant-driven energy use. Unite supports monitoring building performance in principle but considers that monitoring total energy use could create an unfair risk of non-compliance for PBSA. It also argues that requirements for assured performance methodologies should not be mandatory unless they have been properly justified and viability tested. Unite's suggested amendments are shown below: 5. New development must demonstrate they are delivering the intended performance approved, and that the 'performance gap' between design and actual in-use regulated energy has been minimised, by: a. Demonstrating and committing to the use of an assured performance method (e.g. Passivhaus or AECB) to ensure that the building's operational energy performance will meet the design intentions. b. Major developments should monitor their total regulated energy use and renewable energy generation in line with the UKNZCBS and submit the annual figures to the London Borough of Newham for the first 5 years of operation. Only regulated energy should be reported so that developers cannot be penalised for tenant-driven energy use.	This comment does not relate to a proposed Main Modification. The Council's position on this matter is set out on page 13 of the Matter 11 Response (EWS050). During the examination hearings, the Council explained that the UKNZCBS sets differing standards, some of which are more stringent than the Council is proposing.

10. Transport

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
Comments not specific to Main Modifications					
N/A	T3 Transport behaviour change	MMC-E-034	Unite Students	Unite notes that no Main Modifications are proposed to Policy T3 despite previous representations. It acknowledges that cycle parking standards are set through the London Plan but considers that more recent guidance indicates a move towards greater flexibility in cycle parking provision, particularly for high-density developments such as PBSA. Unite argues that Policy T3 parts 4 and 5 will lead to overprovision of cycle parking in Purpose-Built Student Accommodation (PBSA). Unite suggests amending Policy T3 to allow flexibility where London Plan cycle parking standards would result in disproportionate provision. Unite refers to the Housebuilding for London LPG, which allows lower levels of cycle parking where site constraints or design impacts justify it. Unite's suggested amendments are shown below: 4. All new development should deliver high quality, sustainable transport storage (including cycle parking, in line with, or higher than, London Plan standards) and should meet the following requirements, as relevant: ... 5. It may be acceptable to provide less than the minimum parking required by London Plan standards in the balance of site constraints and impacts on design, where circumstances such as the following apply: a. Avoiding the need for a basement (or additional basement level) or other design requirements that materially improve viability; b. A small building footprint relative to overall floorspace; or c. The density or scale of development generates a very large requirement and this has a disproportionate effect on requiring what could otherwise be lettable or saleable floorspace. 6. Major developments should consider make provisions for safe and convenient charging of E-bikes and mobility scooters where appropriate.	This comment does not relate to a proposed Main Modification. As discussed on day 12 of the hearing sessions, the Newham Local Plan uses the London Plan for cycle parking standards. If the London Plan cycle parking standard for PBSA changes (as has already occurred following the Housebuilding for London LPG), the standard that the Council uses will change.

11. Waste and Utilities

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
Comments not specific to Main Modifications					
N/A	W3 Utilities and digital infrastructure	MMC-E-033	Thames Water	Thames Water reiterates its Regulation 19 comments on Policies W4 and maintains its previous position where no modifications have been made.	This comment does not relate to a proposed Main Modification. The Council's position on this matter is set out on page 86-88 of the Regulation 22 Statement Consultation Report (SD017), as well as on page 20-21 of the Matter 11 Response (EWS050).
N/A	Waste and Utilities	MMC-E-044	National Grid Electricity Transmission	Suggest that the Council consult National Grid Electricity Transmission (NGET) at the earliest opportunity on development proposals and planning policies that may affect existing or future electricity transmission infrastructure. Suggest requiring development near transmission assets to demonstrate that it will not compromise the safety, operation, maintenance, replacement, or future expansion of the electricity network. NGET also recommends safeguarding access routes needed for the transport of large equipment associated with transmission infrastructure and resisting development or highway changes that could restrict such access unless suitable mitigation is secured. NGET highlights the importance of a reliable electricity network to support increasing demand and the transition to net zero. It supports high-quality design and sustainable development and recognises the need for a creative approach to development around high-voltage overhead lines and other transmission assets.	Comment noted.
N/A	Waste and Utilities	MMC-E-044	National Grid Electricity Transmission	Suggest that the Council safeguard existing and future National Grid Electricity Transmission (NGET) infrastructure and support network reinforcement projects necessary to meet growing electricity demand and net zero objectives. Suggest requiring development proposals near transmission assets to protect their safe operation, maintenance, replacement and future expansion. NGET also recommends safeguarding access routes for large infrastructure components and resisting development or highway changes that could restrict this access unless appropriate mitigation is secured. Suggest encouraging early engagement with NGET to identify and address potential impacts on transmission infrastructure during the planning process. NGET highlights the increasing importance of electricity transmission infrastructure in supporting the transition to renewable energy, national decarbonisation targets, energy security and future growth. It emphasises the need to protect existing assets while enabling future network upgrades and expansion.	Comment noted.

13. Neighbourhoods

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
Main Modifications					
MM108	N2.SA1 Silvertown Quays	MMC-E-033	Thames Water	Object to the proposed modification that remove references to wastewater infrastructure from site allocation phasing requirements. Thames Water considers that infrastructure needs may change if the scale, timing or nature of development proposals changes at the planning application stage. For this reason, Thames Water believes the policies should continue to address both water supply and wastewater infrastructure requirements.	This modification was proposed to provide greater clarity regarding utility infrastructure requirements, following the updated position set out by Thames Water in its Statement of Common Ground (ED005). However, the Council agrees that the wording should be broadened to encompass both water supply and wastewater infrastructure. This amendment would ensure the policy remains effective and responsive to evolving development needs and infrastructure requirements. The Council therefore suggests that the text be amended as follows: “Phasing of the site should take account of the likely requirement for water supply and wastewater infrastructure upgrades”.
MM108 [Suggest this comment refers to MM194]	N11.SA3 Alpine Way	MMC-E-033	Thames Water	Welcome the additional wording on odour management within the allocation. Object to the proposed odour management requirements stating that they do not go far enough and maintains that Policy N11.SA3 is not sound. They state that Thames Water has not seen any odour mitigation feasibility testing to demonstrate that development can be delivered without unacceptable impacts from nearby odour sources, including Beckton STW. They argue that further mitigation opportunities at Beckton STW are limited and may not be feasible. They also consider the requirement to “minimise exposure to odour” to be unclear, as it does not define who is responsible for mitigation or whether mitigation can realistically be achieved. As a result, they believe the policy is not positively prepared, justified, effective, or consistent with national policy. Suggests that odour mitigation feasibility testing is completed before planning applications are submitted and that the policy clearly identifies responsibility for mitigation. “Design measures should <u>minimise exposure to odour from Beckton Sewage Treatment Works (as identified through Odour Impact Assessment with the necessary mitigation and clarification of who is responsible for mitigation work)</u>, [...]” Notes that the site is close to Beckton STW and a Municipal Waste Transfer Station, both of which are sources of odour. They also note that opportunities for further odour mitigation at Beckton STW are limited.	This wording change is not supported. The Council does not consider the proposed amendment to be necessary, as Policy W4 part 4 already requires the submission of an Odour Impact Assessment. The level of detail sought by the respondent, including the identification of mitigation measures and who is responsible, would be addressed through that assessment and the subsequent planning application process. The Council is satisfied that the existing policy framework ensures the Plan is positively prepared, justified and effective. Accordingly, the Council is satisfied that the Plan remains sound without the proposed amendment.

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
MM110	N2.SA2 Lyle Park West	MMC-E-222	Ballymore Group	Welcome the increase from 40m (13 storeys) to 60m (20 storeys) height in N2.SA2 Lyle Park West. However, it considers that the revised height range remains overly restrictive. It argues that the proposed height does not fully reflect the site's location within an Opportunity Area, its riverside setting, and emerging development patterns across the wider Royal Docks area. Suggest introducing additional flexibility to allow taller development where this can be justified through a design-led approach. It proposes the following wording: <u>Heights above this range may be appropriate where justified through a design-led approach.</u>	This wording change is not supported. We do not consider this change to be necessary as the modification was proposed in order to allow a degree of flexibility - as suggested by the GLA and a few developers – and reflect that tall buildings have been permitted in the tall building zones with a greater height parameter, whilst reflecting the spatial strategy based on the analysis evidenced in the Tall Building Annex 2024 (EB023) and in the Tall Buildings Topic Paper 2025 (TP004). The proposed modification responds to the action points AP5 (ED017a), AP13 (ED019) and AP14 (ED019) suggested from the Inspector during the weeks 1 and 2 hearing sessions. This ensures the Plan is justified and is in line with London Plan Policy D9 requirements, London Plan Policy D3, Characterisation and Growth Strategy London Plan Guidance (2023) and Tall Building Annex 2024 (EB023). The Council is satisfied that the plan remains sound without the proposed changes.
MM110	N2.SA2 Lyle Park West	MMC-E-008	Hagley Ltd	Welcome the amendment to increase the taller building height parameter to “approximately 60m (ca. 20 storeys)”. Object to the retention of the building height range of 21-32m (approximately 7-10 storeys). The respondent considers that, although the introduction of the word “generally” makes the policy less prescriptive, the approach remains restrictive and does not go far enough to make the policy sound. Object to the proposed height range on the basis that it is not justified. The respondent states that the evidence base, including the Tall Building Assessment and Characterisation Study, identifies the site as being ‘not sensitive to change’, located within a ‘high opportunity for growth area’ and a designated area for ‘transform’. Object to the proposed height range because it is inconsistent with the findings of the previous Local Plan examination. The respondent notes that the previous Inspector considered restrictions on building heights at similar strategic sites to be unjustified and required taller building heights to ensure the allocation and Plan were sound. Object to the proposed height range as being inconsistent with national policy. The respondent states that the National Planning Policy Framework places emphasis on making effective use of land, optimising development capacity and delivering higher-density development in accessible locations. They consider the proposed 7-10 storey height range would not support these objectives.	This wording change is not supported. We do not consider this change to be necessary as the modification was proposed in order to align the design principle of the site allocation with the modifications proposed to Policy D4. Proposed main modification MM17 and MM18 allow a degree of flexibility to the approach to height. However, the wording change for the prevailing height is not supported. Section 3 ‘prevailing height parameter’ of the Tall Buildings Topic Paper (2025) is relevant to expand on how the introduction of complementary ‘prevailing heights’ can support the sustainable integration of tall building developments with the generally low rise to mid-rise character of the borough. It also explains the rational beyond the two prevailing heights identified in the borough. The Council is satisfied that the plan remains sound without the proposed changes on the prevailing height parameters.
MM111	N2.SA2 Lyle Park West	MMC-E-033	Thames Water	Object to the proposed modification that remove references to wastewater infrastructure from site allocation phasing requirements. Thames Water considers that infrastructure needs may change if the scale, timing or nature of development proposals changes at the planning application stage. For this reason, Thames Water believes the policies should continue to	This modification was proposed to provide greater clarity regarding utility infrastructure requirements, following the updated position set out by Thames Water in its Statement of Common Ground (ED005). However, the Council agrees that the wording should be broadened to encompass both water supply and wastewater infrastructure. This amendment would ensure the policy remains effective and responsive to evolving

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
				address both water supply and wastewater infrastructure requirements.	development needs and infrastructure requirements. The Council therefore suggests that the text be amended as follows: “Phasing of the site should take account of the likely requirement for water supply and wastewater infrastructure upgrades”.
MM116; PM4	N2.SA4 Thameside West	MMC-EC-169	Silvertown Homes Ltd	Welcome the inclusion of updated maximum building height parameters in Site Allocation N2.SA4 (Land at Thameside West and Carlsberg Tetley Dock) to reflect the building heights approved under the Hybrid Planning Permission (ref. 18/03557/OUT) for N2.SA4 Thameside West site. Suggest further refinements to the Policies Map to ensure it aligns with the approved Hybrid Planning Permission, is consistent with the approach taken to other strategic site allocations, and provides flexibility as development comes forward across the site.	This wording change is not supported. We do not consider this change to be necessary as the modification was proposed in order to allow a degree of flexibility whilst reflecting the spatial strategy based on the analysis evidenced in the Tall Building Annex 2024 (EB023) and in the Tall Buildings Topic Paper 2025 (TP004). As set out in the Council's response to Action Point AP14 (ED019) and discussed at the hearing session, the Council included 60m and 100m height zones where buildings of these heights or similar were shown in the parameter plan. However, given the site's low level of accessibility and its proximity to the airport, the Council do not consider it appropriate to identify larger areas for heights above 50m in locations that were not considered suitable for taller buildings. This approach is consistent with the tall building assessment evidenced in the Tall Building Annex (EB023). However, the Council considers, the flexibility provided by Policy D4 through Main Modifications MM17 and MM18 will allow the detailed distribution of building heights shown in the parameter plan to be considered and refined at the next stages of the outline planning permission process. This ensures the Plan is justified and is in line with London Plan Policy D9 requirements, London Plan Policy D3, Characterisation and Growth Strategy London Plan Guidance (2023) and Tall Building Annex (EB023). The Council is satisfied that the plan remains sound without the proposed changes.
MM116	N2.SA4 Thameside West	MMC-EC-169	Silvertown Homes Ltd	Modification supported.	Support noted.
MM118	N2.SA4 Thameside West	MMC-E-044	National Grid Electricity Transmission	Welcome the changes made through MM118, stating that they address the agreed amendments in the April 2025 Statement of Common Ground. They consider the revised wording to provide greater clarity to developers regarding National Grid Electricity Transmission (NGET) assets. Suggest that the “Sensitive Edge – Infrastructure” designation and NGET asset illustrations are retained and applied consistently across relevant site allocations. They consider that these features add value beyond a purely illustrative role. Note that no Main Modifications have been proposed to amend the N2.SA4 site allocation map. They therefore assume that the “Sensitive Edge – Infrastructure” designation will remain.	Support noted.
MM118	N2.SA4 Thameside West	MMC-E-033	Thames Water	Object to the proposed modification that remove references to wastewater infrastructure from site allocation phasing	This modification was proposed to provide greater clarity regarding utility infrastructure requirements, following the updated position set out by Thames

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
				requirements. Thames Water considers that infrastructure needs may change if the scale, timing or nature of development proposals changes at the planning application stage. For this reason, Thames Water believes the policies should continue to address both water supply and wastewater infrastructure requirements.	Water in its Statement of Common Ground (ED005). However, the Council agrees that the wording should be broadened to encompass both water supply and wastewater infrastructure. This amendment would ensure the policy remains effective and responsive to evolving development needs and infrastructure requirements. The Council therefore suggests that the text be amended as follows: “Phasing of the site should take account of the likely requirement for water supply and wastewater infrastructure upgrades”.
MM119	N2.SA5 Excel Western Entrance	MMC-EC-183	London International Exhibition Centre Plc (ExCeL) and Mount Anvil	Welcome the changes to the Site Allocation Map for N2.SA5 Excel Western Entrance, particularly the reduction in the area identified as an “opportunity for green space”. Object to any interpretation of the Site Allocation Map that treats the illustrated green space opportunities as fixed requirements. They consider that a literal interpretation could significantly constrain development on the site, reduce its development potential, and undermine the delivery of the allocation’s intended land uses. They argue this could make the allocation unviable and prevent it from achieving its objectives.	This modification was proposed to provide greater clarity regarding the opportunity to deliver green space within the site. Concerns that the Indicative Diagram could be interpreted as a prescriptive requirement have been addressed through Main Modification MM94, which explicitly clarifies that the Indicative Diagrams are intended to be illustrative only and should not be treated as fixed development parameters. The Council is satisfied that these concerns have been adequately addressed and that the Plan remains sound without the need for any further changes.
MM122	N2.SA5 Excel Western Entrance	MMC-EC-183	London International Exhibition Centre Plc (ExCeL) and Mount Anvil	Modification supported.	Support noted.
MM125	N3.SA1 Royal Albert North	MMC-E-033	Thames Water	Object to the proposed modification that remove references to wastewater infrastructure from site allocation phasing requirements. Thames Water considers that infrastructure needs may change if the scale, timing or nature of development proposals changes at the planning application stage. For this reason, Thames Water believes the policies should continue to address both water supply and wastewater infrastructure requirements.	This modification was proposed to provide greater clarity regarding utility infrastructure requirements, following the updated position set out by Thames Water in its Statement of Common Ground (ED005). However, the Council agrees that the wording should be broadened to encompass both water supply and wastewater infrastructure. This amendment would ensure the policy remains effective and responsive to evolving development needs and infrastructure requirements. The Council therefore suggests that the text be amended as follows: “Phasing of the site should take account of the likely requirement for water supply and wastewater infrastructure upgrades”.
MM127	N3.SA1 Royal Albert North [this is the reference provided in the representation]	MMC-E-044	National Grid Electricity Transmission	Suggests retaining references to infrastructure within the ‘Sensitive Edge’ designation in the indicative diagrams for Policies N7.SA2 and N3.SA1. They consider this information adds value by identifying infrastructure as a site constraint.	Please note that MM127 relates to Site Allocation N4.SA1 rather than N3.SA1. The modification to the indicative diagram keys was introduced to provide greater clarity and to ensure that the key references are specific to each site allocation and its surrounding context. This change was made in response to Action Point AP22 (ED019) and reflects the Inspector’s recommendations arising from the Week 2 hearing sessions. In addition, no modification is proposed to Site Allocation N3.SA1 in relation to the infrastructure sensitive edge designation, and the wording concerning the infrastructure-sensitive edge remains unchanged. The Council does not consider the proposed amendment to be necessary. The

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
					indicative diagrams are intended to be illustrative, and the wording of the relevant site allocation policies has already been updated and agreed through the Statement of Common Ground. This provides an appropriate and effective framework for managing the impact of development on energy infrastructure and ensures that the Plan remains effective. The Council is satisfied that the Plan remains sound without the proposed amendments.
MM128	N4.SA1 Canning Town East	MMC-E-033	Thames Water	Object to the proposed modification that remove references to wastewater infrastructure from site allocation phasing requirements. Thames Water considers that infrastructure needs may change if the scale, timing or nature of development proposals changes at the planning application stage. For this reason, Thames Water believes the policies should continue to address both water supply and wastewater infrastructure requirements.	This modification was proposed to provide greater clarity regarding utility infrastructure requirements, following the updated position set out by Thames Water in its Statement of Common Ground (ED005). However, the Council agrees that the wording should be broadened to encompass both water supply and wastewater infrastructure. This amendment would ensure the policy remains effective and responsive to evolving development needs and infrastructure requirements. The Council therefore suggests that the text be amended as follows: “Phasing of the site should take account of the likely requirement for water supply and wastewater infrastructure upgrades”.
MM131	N4.SA3 Canning Town Holiday Inn	MMC-E-033	Thames Water	Object to the proposed modification that remove references to wastewater infrastructure from site allocation phasing requirements. Thames Water considers that infrastructure needs may change if the scale, timing or nature of development proposals changes at the planning application stage. For this reason, Thames Water believes the policies should continue to address both water supply and wastewater infrastructure requirements.	This modification was proposed to provide greater clarity regarding utility infrastructure requirements, following the updated position set out by Thames Water in its Statement of Common Ground (ED005). However, the Council agrees that the wording should be broadened to encompass both water supply and wastewater infrastructure. This amendment would ensure the policy remains effective and responsive to evolving development needs and infrastructure requirements. The Council therefore suggests that the text be amended as follows: “Phasing of the site should take account of the likely requirement for water supply and wastewater infrastructure upgrades”.
MM132	N4.SA4 Limmo	MMC-E-222	Ballymore Group	Welcome, in part, the Main Modifications for Limmo Peninsula, particularly the introduction of taller building elements (up to approximately 100m) to help optimise the site's development potential. Object to the continued use of defined height zones and a step-down height hierarchy. They consider this could constrain the optimisation of the site and only partially addresses their previous concerns. Suggests greater flexibility across the allocation. They recommend that heights, capacity and site layout should be determined through a comprehensive, design-led masterplanning process informed by site constraints and delivery considerations.	This wording change is not supported. We do not consider this change to be necessary as the modification was proposed in order to allow a degree of flexibility - as suggested by the GLA and a few developers – whilst reflecting the spatial strategy based on the analysis evidenced in the Tall Building Annex 2024 (EB023) and in the Tall Buildings Topic Paper 2025 (TP004) .The proposed modification responds to the action points AP5 (ED017a), AP13 (ED019) and AP14 (ED019) suggested by the Inspector during weeks 1 and 2 hearing sessions. This ensures the Plan is justified and is in line with London Plan Policy D9 requirements, London Plan Policy D3, Characterisation and Growth Strategy London Plan Guidance (2023) and Tall Building Annex 2024 (EB023). The Council is satisfied that the plan remains sound without the proposed changes.
MM133	N4.SA4 Limmo	MMC-E-033	Thames Water	Object to the proposed modification that remove references to wastewater infrastructure from site allocation phasing requirements. Thames Water considers that infrastructure needs may change if the scale, timing or nature of development proposals changes at the planning application stage. For this	This modification was proposed to provide greater clarity regarding utility infrastructure requirements, following the updated position set out by Thames Water in its Statement of Common Ground (ED005). However, the Council agrees that the wording should be broadened to

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
				reason, Thames Water believes the policies should continue to address both water supply and wastewater infrastructure requirements.	encompass both water supply and wastewater infrastructure. This amendment would ensure the policy remains effective and responsive to evolving development needs and infrastructure requirements. The Council therefore suggests that the text be amended as follows: “Phasing of the site should take account of the likely requirement for water supply and wastewater infrastructure upgrades”.
MM142	N5.SA4 Royal Road	MMC-E-033	Thames Water	Object to the proposed modification that remove references to wastewater infrastructure from site allocation phasing requirements. Thames Water considers that infrastructure needs may change if the scale, timing or nature of development proposals changes at the planning application stage. For this reason, Thames Water believes the policies should continue to address both water supply and wastewater infrastructure requirements.	This modification was proposed to provide greater clarity regarding utility infrastructure requirements, following the updated position set out by Thames Water in its Statement of Common Ground (ED005). However, the Council agrees that the wording should be broadened to encompass both water supply and wastewater infrastructure. This amendment would ensure the policy remains effective and responsive to evolving development needs and infrastructure requirements. The Council therefore suggests that the text be amended as follows: “Phasing of the site should take account of the likely requirement for water supply and wastewater infrastructure upgrades”.
MM144	N7.SA1 Abbey Mills	MMC-E-023	Anjuman-e-Islahul-Muslimeen of (London) UK	Support the inclusion of the wording “In addition to the mosque”. Consider the policy is not positively planned and conflicts with the NPPF requirement to plan over a 15-year period from adoption. Not allowing for growth in replacement mosque provision fails to respond to future needs. Note that evidence identifies a weak existing provision of community facilities and mosque space within the local area. Suggest amending the policy to require replacement of the existing temporary mosque with “no less floorspace than what currently exists” and to ensure the replacement provision meets Local Plan Policy SI1 and London Plan Policy S1. Consider that this would better address future community facility needs and support positive planning.	This wording change is not supported. We do not consider this change to MM144 to be necessary as the modification was proposed to address Action Point AP62 (ED028). The Council's position on this matter is set out further in its response Action Point AP78, contained within the Week 5 Hearing Action Points response (ED029). The Council is satisfied that the plan remains sound without the proposed changes.
MM145	N7.SA1 Abbey Mills	MMC-E-023	Anjuman-e-Islahul-Muslimeen of (London) UK	Modification supported.	Support noted.
MM145	N7.SA1 Abbey Mills	MMC-E-023	Anjuman-e-Islahul-Muslimeen of (London) UK	Object to the proposed height range on the site, considering it unjustified as has not been informed by full consideration of the emerging context to the south of the site. Object to the step down approach from the proposed 100m area to the retained 40m area and the prevailing height between 21m-32m as not suitable for the desired height transition across TBZs requested by the Council. Objecting to the proposed height parameters as they could limit the site's capacity.	This wording change is not supported. We do not consider this change to be necessary as the modification was proposed in order to acknowledge the emerging context in the N7.SA2 Twelvetreets 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 proposed modification responds to the action point AP14 (ED019) suggested by the Inspector during the week 2 hearing session. The Council considers the limitation of a 100m zone and the retaining of the 40m zone is justified and consistent with the spatial strategy approach which includes lower height parameters in proximity to the sensitive areas of the Borough. The Regulation 18 Consultation Report: Design Comments (SD037) and the Regulation 19 Consultation Report: Design Comments (SD021) evidence the

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
					balanced approach the Council took to respond to concerns raised by Lee Valley Regional Park Authority regarding the impact of tall buildings on heritage assets. This ensures the Plan is justified and is in line with London Plan Policy D9 requirements, London Plan Policy D3, Characterisation and Growth Strategy London Plan Guidance (2023) and Tall Building Annex (EB023). The Council is satisfied that the plan remains sound without the proposed changes.
MM145	N7.SA1 Abbey Mills	MMC-E-023	Anjuman-e-Islahul-Muslimeen of (London) UK	Object to the continued reference to West Ham Station in versions 4 and 5 of the policy wording. They note that the reference had been removed in version 3 through modification FM040 but was subsequently reintroduced. The respondent reiterates their previous position from the hearing sessions that this requirement should be removed entirely.	Error is noted. This will be rectified in the adopted version of the Plan.
MM146	N7.SA1 Abbey Mills	MMC-E-023	Anjuman-e-Islahul-Muslimeen of (London) UK	No comments	Comment noted
MM146	N7.SA1 Abbey Mills	MMC-E-102	Network Rail	Suggests that MM146 is amended to identify Network Rail, alongside TfL, as a key stakeholder to be consulted on any proposals affecting West Ham Station. They note that Network Rail owns the station infrastructure and plays a key role in planning and delivering station improvements. They propose the following wording amendment: <u>“The applicant should engage with TfL and Network Rail at the point of application to see if land is required to enable station upgrades at West Ham Station.”</u>	The need for clarification is noted. The Council suggests the text is modified as follows: They propose the following wording amendment: <u>The applicant should engage with TfL and Network Rail at the point ahead of any future application to see if land is required to enable station upgrades at West Ham station.</u>
MM146	N7.SA1 Abbey Mills	MMC-E-013	Transport for London	Suggest that MM146 is amended to require engagement with Network Rail, as well as TfL, before any future planning application is submitted. They note that Network Rail has responsibility for part of West Ham Station and early engagement would help identify any land requirements needed to facilitate station upgrades. They propose the following wording amendment: <u>The applicant should engage with TfL and Network Rail at the point ahead of any future application to see if land is required to enable station upgrades at West Ham station.</u>	The need for clarification is noted. The Council supports the suggestion made as follows: They propose the following wording amendment: <u>The applicant should engage with TfL and Network Rail at the point ahead of any future application to see if land is required to enable station upgrades at West Ham station.</u>
MM147	N7.SA2 Twelvetrees Park and Former Bromley By Bow Gasworks	MMC-E-044	National Grid Electricity Transmission	Suggests retaining references to infrastructure within the ‘Sensitive Edge’ designation in the indicative diagrams for Policies N7.SA2 and N4.SA1. They consider this information adds value by identifying infrastructure as a site constraint.	This modification was proposed to clarify the keys to the indicative diagrams so that they are relevant to the specific site and its surroundings, as set out in Action Point AP22 (ED019) and suggested by the Inspector during the Week 2 hearing sessions. The Council does not consider the proposed change to be necessary. The

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
					indicative diagrams are intended to be illustrative, and the wording of the relevant site allocation policies has already been updated and agreed through the Statement of Common Ground (SD066), providing an effective framework for managing the impact of development on energy infrastructure. This ensures that the Plan remains effective. The Council is satisfied that the Plan remains sound without the proposed amendments.
MM149	N7.SA2 Twelvetrees Park and Former Bromley by Bow Gasworks	MMC-E-033	Thames Water	Object to the proposed modification that remove references to wastewater infrastructure from site allocation phasing requirements. Thames Water considers that infrastructure needs may change if the scale, timing or nature of development proposals changes at the planning application stage. For this reason, Thames Water believes the policies should continue to address both water supply and wastewater infrastructure requirements.	This modification was proposed to provide greater clarity regarding utility infrastructure requirements, following the updated position set out by Thames Water in its Statement of Common Ground (ED005). However, the Council agrees that the wording should be broadened to encompass both water supply and wastewater infrastructure. This amendment would ensure the policy remains effective and responsive to evolving development needs and infrastructure requirements. The Council therefore suggests that the text be amended as follows: “Phasing of the site should take account of the likely requirement for water supply and wastewater infrastructure upgrades”.
MM152; PM6 (TBZ18); PM16 (HS1)	N7.SA3 Sugar House Island	MMC-C-094	Supervene obo Vastint UK.B.V	Modification supported.	Support noted.
MM153	N7.SA3 Sugar House Island	MMC-E-033	Thames Water	Object to the proposed modification that remove references to wastewater infrastructure from site allocation phasing requirements. Thames Water considers that infrastructure needs may change if the scale, timing or nature of development proposals changes at the planning application stage. For this reason, Thames Water believes the policies should continue to address both water supply and wastewater infrastructure requirements.	This modification was proposed to provide greater clarity regarding utility infrastructure requirements, following the updated position set out by Thames Water in its Statement of Common Ground (ED005). However, the Council agrees that the wording should be broadened to encompass both water supply and wastewater infrastructure. This amendment would ensure the policy remains effective and responsive to evolving development needs and infrastructure requirements. The Council therefore suggests that the text be amended as follows: “Phasing of the site should take account of the likely requirement for water supply and wastewater infrastructure upgrades”.
MM166	N8.SA5 Stratford Town Centre West	MMC-E-033	Thames Water	Object to the proposed modification that remove references to wastewater infrastructure from site allocation phasing requirements. Thames Water considers that infrastructure needs may change if the scale, timing or nature of development proposals changes at the planning application stage. For this reason, Thames Water believes the policies should continue to address both water supply and wastewater infrastructure requirements.	This modification was proposed to provide greater clarity regarding utility infrastructure requirements, following the updated position set out by Thames Water in its Statement of Common Ground (ED005). However, the Council agrees that the wording should be broadened to encompass both water supply and wastewater infrastructure. This amendment would ensure the policy remains effective and responsive to evolving development needs and infrastructure requirements. The Council therefore suggests that the text be amended as follows: “Phasing of the site should take account of the likely requirement for water supply and wastewater infrastructure upgrades”.
MM170	N8.SA7 Rick Roberts Way	MMC-E-217	London Legacy Development Corporation	Modification supported.	Support noted.

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MM171	N8.SA7 Rick Roberts Way	MMC-E-217	London Legacy Development Corporation	Modification supported.	Support noted.
MM172	N8.SA7 Rick Roberts Way	MMC-E-217	London Legacy Development Corporation	Welcomes modification MM172 and the intention to deliver a minimum of 1.2ha of open space and a Multi-Use Games Area (MUGA) on the publicly owned land, consistent with the extant planning permission. Suggests amending the wording to make clear that the MUGA can be provided within the minimum 1.2ha of open space. They state this would avoid reducing the amount of housing that can be delivered and would support a comprehensive and balanced development. The following wording is proposed: “Development should address existing open green space deficiencies by providing a sSmall eOpen sSpace with a minimum of 1.2 hectares on the publicly owned land, and provide including a sports-lit Multi Use Games Area (unless this is delivered at N8.SA5 Stratford Town Centre West) on the publicly owned land. Green space provision should meet the requirements of Local Plan Policies GWS1 and GWS3.”	This wording change is not supported. We do not consider this change to MM172 to be necessary as the modification was proposed in response to Action AP16 (ED019). Following the hearing session on 17 February, the Council proposed an additional modification to the implementation text for Policy GWS1, part 1 to provide further clarification on the delivery of green space, play spaces and MUGAs on site allocations (Action Point 72, ED029). This modification (MM68) sets out: <u>In addition to the required publicly accessible green space, site allocations must also deliver publicly accessible play space (Policy GWS5) and Multi Use Games Areas (MUGAs) where an identified need exists. These spaces are separate from the publicly accessible green space requirement but may be designed as a continuous or integrated provision. The detailed arrangement will be established through the co designed masterplanning process in accordance with Policy BFN2.</u> The Council notes that the representor has not submitted comments in relation to MM68, which provides the framework through which these matters will be resolved at the planning application stage. The Council is satisfied that the plan remains sound without the proposed changes.
MM175	N8.SA8 Bridgewater Road	MMC-E-217	London Legacy Development Corporation	Welcome the flexibility introduced through the wider amendments to the tall buildings strategy. Objects to the current wording on building heights and massing, as they consider it lacks clarity. They also object to the proposed extension of the adjacent Greenway SINC onto the site allocation, arguing that the land is already allocated and approved for development. Suggest amending the site allocation wording to provide greater clarity on the intended distribution of building heights across the site and to ensure consistency with the amended approach to building heights elsewhere in the Plan. Suggest the following modification: [..] Building heights should generally range between 21-32m (ca. 7-10 storeys) with taller buildings of approximately up to 50m (ca. 16 storeys) in the east and south east of the site and approximately 60m in the west of the site (ca. 20 storeys) to aid wayfinding. 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	No objection to the proposed wording, although it is not considered necessary for soundness. Regarding the comment about the extension of the adjacent Greenway SINC onto the Site Allocation. This comment does not relate to a proposed Main Modification. As set out in the Council's Written Statement for Matter 12 (EW053), the Council considers the SINC designations shown on the Policies Map to be justified, consistent with national policy and in conformity with the London Plan. The SINC Review was undertaken by the London Wildlife Trust on behalf of the Council and was considered by the Local Wildlife Sites Board in September 2023, which confirmed that the review had been carried out in accordance with relevant guidance and best practice. Furthermore, Policy GWS3 part 6 applies a mitigation hierarchy to development proposals affecting Sites of Importance for Nature Conservation. This approach is in conformity with London Plan Policy G6 (2021) and ensures that biodiversity impacts are appropriately avoided, mitigated or compensated where necessary. The Council is satisfied that the Plan remains sound without the proposed change.

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
				<u>spaces to avoid or minimise overshadowing impact.</u> [...]	
MM177	N8.SA9 Pudding Mill	MMC-E-217	London Legacy Development Corporation	Modification supported.	Support noted.
MM187	N11 Beckton	MMC-E-033	Thames Water	Welcome the additional wording in Policy N11 which seeks to mitigate odour impacts from Beckton Sewage Treatment Works (STW) through buffering and other design solutions. Object to the wording as it does not go far enough and maintains that the policy is not sound. They argue that the requirement is vague, does not reflect the previous Inspector recommendations from the current Local Plan Inspector's Report of November 2018 regarding odour assessment and mitigation, and does not recognise that further odour mitigation at Beckton STW may be limited or unfeasible. Suggest that the policy includes clearer requirements for Odour Impact Assessments, mitigation measures and responsibility for mitigation works. They also recommend continued engagement with Thames Water and completion of odour mitigation feasibility testing before planning applications are submitted. They propose the following amendment: “13. mitigating the odour impacts of the sewage treatment works <u>ahead of the occupation of developments in the vicinity through appropriate buffering and other design solutions <u>as identified through Odour Impact Assessment with the necessary mitigation and clarification who is responsible for mitigation work</u></u>,” Notes that significant odour mitigation has already been undertaken at Beckton STW, limiting opportunities for further mitigation. They also note that larger buffers may be required if sufficient mitigation cannot be achieved, potentially restricting odour-sensitive development.	This wording change is not supported. The Council does not consider the proposed amendment to be necessary, as Policy W4 part 4 already requires the submission of an Odour Impact Assessment. The level of detail sought by the respondent, including the identification of mitigation measures and who is responsible, would be addressed through that assessment and the subsequent planning application process. The Council is satisfied that the existing policy framework ensures the Plan is positively prepared, justified and effective. Accordingly, the Council is satisfied that the Plan remains sound without the proposed amendment.
MM188	N11.SA1 East Beckton Town Centre	MMC-E-044	National Grid Electricity Transmission	Welcome the changes made through MM188, MM190 and MM191. They consider these modifications to satisfactorily address their previous requests relating to the National Grid Electricity Transmission (NGET) overhead line within the site. Suggest that the site allocation mapping is amended, as previously proposed in the Statement of Common Ground, to include a “Sensitive Edge – Infrastructure” designation. They consider this would provide additional clarity and value alongside the amended policy wording.	Support noted. The Council's position on this matter is set out in the Statement of Common Ground with National Grid (SD066).

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
MM190	N11.SA1 East Beckton Town Centre	MMC-E-044	National Grid Electricity Transmission	Welcome the changes made through MM188, MM190 and MM191. They consider these modifications to satisfactorily address their previous requests relating to the National Grid Electricity Transmission (NGET) overhead line within the site. Suggest that the site allocation mapping is amended, as previously proposed in the Statement of Common Ground, to include a “Sensitive Edge – Infrastructure” designation. They consider this would provide additional clarity and value alongside the amended policy wording.	Support noted. The Council's position on this matter is set out in the Statement of Common Ground with National Grid (SD066).
MM191	N11.SA1 East Beckton Town Centre	MMC-E-044	National Grid Electricity Transmission	Welcome the changes made through MM188, MM190 and MM191. They consider these modifications to satisfactorily address their previous requests relating to the National Grid Electricity Transmission (NGET) overhead line within the site. Suggest that the site allocation mapping is amended, as previously proposed in the Statement of Common Ground, to include a “Sensitive Edge – Infrastructure” designation. They consider this would provide additional clarity and value alongside the amended policy wording.	Support noted. The Council's position on this matter is set out in the Statement of Common Ground with National Grid (SD066).
MM195	N11.SA3 Alpine Way	MMC-E-181	LAMIT c/ CCLA Investment Management Ltd	Object to MM195, which requires all necessary water supply infrastructure upgrades to be delivered ahead of occupation. They consider this overly restrictive and argue that it could unnecessarily delay housing delivery, as some phases of development may be occupied before upgrades are required. Suggest amending the wording to allow infrastructure upgrades to be delivered at a later stage in the phased occupation of the development, following engagement with Thames Water. They propose the following amendment: <u>“Phasing of the site should take account of the likely requirement for water supply infrastructure upgrades, through early engagement with Thames Water in order to ensure that any necessary infrastructure upgrades are delivered at an appropriate point in the phased occupation of the proposed ahead of the occupation of development.”</u>	This wording change is not supported. We do not consider this change to the modification to be necessary as this modification was proposed and agreed with Thames Water in the Statement of Common Ground with Thames Water (ED005). This ensures the Plan is positively prepared and effective. The Council is satisfied that the plan remains sound without the proposed changes.
MM198	N13.SA3 Former East Ham Gasworks	MMC-E-238	Environment Agency	Modification supported.	Support noted.
MM199	N13.SA3 Former East Ham Gasworks	MMC-E-044	National Grid Electricity Transmission	Modification supported.	Support noted.
MM200	N13.SA3 Former East Ham Gasworks	MMC-E-195	Berkeley Group	Object to MM200, which should be amended further to reflect the Inspector's direction in AP74. The indicative diagram does not accurately reflect the revised Metropolitan Open Land (MOL) boundary, the intended developable area, or the proposed	This change is not supported. We do not consider this change to MM200 to be necessary as it was proposed specifically to address Action Point AP74 (ED029).

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
				release of MOL parcels A22–A24. Suggest updating the indicative diagram to reflect the revised MOL boundary and proposed de-designation. Amend or remove references to green space in the southern part of the site where they could be interpreted as restricting development, and make clear that development can take place outside the retained MOL boundary. Note that pre-app discussions and previous representations recognised that limited development within land currently designated as Green Space is necessary to support the comprehensive redevelopment of the site and deliver the allocation's objectives.	The indicative diagram for site allocation N13.SA3 illustrates the opportunity for green space in accordance with the sites Green Space designation and also identifies the part of the site that has been de-designated as Metropolitan Open Land (MOL). No reconfiguration or release of land designated as green space is proposed within site allocation N13.SA3, other than the correction made through PM25 to the green space designation to accurately reflect the extent of the Previously Developed Land (PDL). The Council considers the illustrative diagram to be positively prepared, as the green space designation has been justified by the evidence contained in Newham's Green and Water Infrastructure Strategy (2025) (EB061-EB067). While Policy GWS1 protects all green space, Part 3 of the policy provides a mechanism to consider circumstances where green space can be lost or reduced through development. The Council is satisfied that the Plan remains sound without the proposed changes.
MM200	N13.SA3 Former East Ham Gasworks	MMC-E-044	National Grid Electricity Transmission	Supports the policy wording changes made through MM199, MM200 and MM203. Suggest that the "Sensitive edge – Infrastructure" designation is reinstated on the indicative diagram for N13.SA3. They consider this would provide additional clarity and value alongside the amended policy wording.	Error is noted. The Council confirms that the only proposed modification to the Indicative Diagram Key is that set out in MM201.
MM202	N13.SA3 Former East Ham Gasworks	MMC-E-195	Berkeley Group	Object to MM202. Seek amendments to ensure the development principles align with the proposed MOL de-designation and comprehensive redevelopment of the site. The proposed wording contains overlapping and potentially inconsistent requirements relating to remediation, retained MOL, green space, public access, playing pitch re-provision and SINC enhancement. The reference to SINC "re-enhancement" is inaccurate because the site is not currently designated as a SINC. The policy should recognise that ecological mitigation and enhancement will be delivered through remediation and redevelopment. Requests a clearer distinction between the retained MOL and the redevelopment area, with green space opportunities focused within the retained MOL. Seeks consequential amendments to Policy BFN1 Part 5(f), which currently refers to the re-provision of playing pitches and their return to public use.	This wording change is not supported. We do not consider a change to be necessary, as MM202 was proposed to ensure the allocation appropriately reflects the exceptional circumstances required to justify the release of a limited area of Metropolitan Open Land (MOL) at this location. The proposed wording for site allocation N13.SA3 was provided in response to Action Point AP64 (ED028) and Action Point AP73 (ED029). During the hearing sessions the Greater London Authority confirmed that this strengthened wording for the site allocation, setting out what the site must deliver in order to justify the release of MOL, addressed its previous concerns regarding conformity with the London Plan and the proposed release of MOL. The Council does not agree that the reference to Sites of Importance for Nature Conservation (SINC) re-enhancement is inappropriate. The emerging Local Plan proposes a new SINC designation for part of the site, as justified by Newham's SINC review (EB070). The Council's position on the Site of Importance for Nature Conservation (SINC) is set out in the Regulation 19 Consultation Report (Reg19-E-195/126a). Regarding Policy BFN1, part 5(f), the Council does not agree that an additional modification is required to ensure consistency. The policy requires the re-provision of the playing pitch at N13.SA3. This is a key requirement of the site allocation which must protect, enhance and bring into public use the disused sports pitches in the MOL. The Council is satisfied that the plan remains sound without the proposed changes.

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MM202	N13.SA3 Former East Ham Gasworks	MMC-E-015	Greater London Authority	Welcome the Main Modifications relating to Policy N13.SA3 Former East Ham Gasworks. They consider that MM202 and MM204 provide clear and measurable criteria for the protection and enhancement of Metropolitan Open Land (MOL). Notes that the modifications do not raise any general conformity issues.	Support noted.
MM202	N13.SA3 Former East Ham Gasworks	MMC-E-294	Sport England	Welcomes the specific mention of bringing sport facilities and playing field/pitches back into use.	Support noted.
MM203	N13.SA3 Former East Ham Gasworks	MMC-E-044	National Grid Electricity Transmission	Modification supported.	Support noted.
MM204	N13.SA3 Former East Ham Gasworks	MMC-E-015	Greater London Authority	Welcome the Main Modifications relating to Policy N13.SA3 Former East Ham Gasworks. They consider that MM202 and MM204 provide clear and measurable criteria for the protection and enhancement of Metropolitan Open Land (MOL). Notes that the modifications do not raise any general conformity issues.	Support noted.
MM205	N13.SA3 Former East Ham Gasworks	MMC-E-033	Thames Water	Object to the proposed modification that remove references to wastewater infrastructure from site allocation phasing requirements. Thames Water considers that infrastructure needs may change if the scale, timing or nature of development proposals changes at the planning application stage. For this reason, Thames Water believes the policies should continue to address both water supply and wastewater infrastructure requirements.	This modification was proposed to provide greater clarity regarding utility infrastructure requirements, following the updated position set out by Thames Water in its Statement of Common Ground (ED005). However, the Council agrees that the wording should be broadened to encompass both water supply and wastewater infrastructure. This amendment would ensure the policy remains effective and responsive to evolving development needs and infrastructure requirements. The Council therefore suggests that the text be amended as follows: “Phasing of the site should take account of the likely requirement for water supply and wastewater infrastructure upgrades”.
MM207	N14 Green Street	MMC-E-236	Friends of Queen's Market	Welcome the positive changes relating to Queen’s Market, wider market policy and the requirement for social impact assessments. Object on the basis that the modifications alone would not adequately mitigate the impacts of the tall building development proposed through the market’s TBZ designation. Note that further measures are needed to address concerns associated with tall building development in Queen’s Market.	Comment noted. The proposed modification responds to Action Point AP19 (ED019), which was identified by the Inspector during the Week 2 hearing sessions. The modification is intended to provide greater clarity regarding the role and characteristics of Queen’s Market, thereby ensuring that the policy is clear, effective, and capable of being implemented as intended.
MM208	N14 Green Street	MMC-E-236	Friends of Queen's Market	Welcome the positive changes relating to Queen’s Market, wider market policy and the requirement for social impact assessments. Object on the basis that the modifications alone would not adequately mitigate the impacts of the tall building development proposed through the market’s TBZ designation.	Comment noted. The proposed modification responds to Action Point AP19 (ED019), which was identified by the Inspector during the Week 2 hearing sessions. The modification is intended to provide greater clarity regarding the role and characteristics of Queen’s Market, thereby ensuring that the policy is clear, effective, and capable of being implemented as intended.

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
				Note that further measures are needed to address concerns associated with tall building development in Queen's Market.	
MM213	N15.SA2 Woodgrange Road West	MMC-E-033	Thames Water	Object to the proposed modification that remove references to wastewater infrastructure from site allocation phasing requirements. Thames Water considers that infrastructure needs may change if the scale, timing or nature of development proposals changes at the planning application stage. For this reason, Thames Water believes the policies should continue to address both water supply and wastewater infrastructure requirements.	It is noted that the Main Modification referred (MM213) to does not correspond with the proposed wording set out in the Main Modifications Schedule (ED030). As a result, it was not clear what comment you were making on this part of the Plan.
MM214	N17.SA1 Beckton Riverside	MMC-E-013	Transport for London	Suggests a minor amendment to MM214 (N17 Gallions Reach: Vision). They state that the word " station " should be added back into the proposed modification to ensure the text correctly refers to both the DLR line extension and the delivery of a new DLR station.	Error is noted. The Council supports the suggestion made as follows: "Gallions Reach will be transformed into a new neighbourhood through phased development supported by the delivery of an extended DLR line and new DLR station or a similarly transformative (as confirmed by Transport for London) public transport intervention and complementary transport measures at N17.SA1 Beckton Riverside."
MM215	N17 Gallions Reach	MMC-E-033	Thames Water	Object to MM215 and maintains that Policy N17 is not sound. They consider the proposed requirement to mitigate odour through buffering and design solutions to be too vague and argue that further mitigation at Beckton Sewage Treatment Works may be limited or unfeasible. Suggests that the policy includes clearer requirements for odour assessment, mitigation and responsibility for mitigation works. They also recommend early engagement with Thames Water and completion of odour mitigation feasibility testing before planning applications are submitted. They propose the following amendment: "mitigating the odour impacts of the sewage treatment works <u>ahead of the occupation of developments in the vicinity through appropriate buffering and other design solutions as identified through Odour Impact Assessment with the necessary mitigation and clarification who is responsible for mitigation work</u>," Note that significant odour mitigation has already been undertaken at Beckton Sewage Treatment Works, limiting opportunities for further mitigation. They also note that larger buffers may be required if sufficient mitigation cannot be achieved.	This wording change is not supported. The Council does not consider the proposed amendment to be necessary, as Policy W4 part 4 already requires the submission of an Odour Impact Assessment. The level of detail sought by the respondent, including the identification of mitigation measures and who is responsible, would be addressed through that assessment and the subsequent planning application process. The Council is satisfied that the existing policy framework ensures the Plan is positively prepared, justified and effective. Accordingly, the Council is satisfied that the Plan remains sound without the proposed amendment.
MM221	N17.SA1 Beckton Riverside	MMC-E-015	Greater London Authority	Object to MM221. They consider that identifying existing retail warehouses as an appropriate buffer could undermine the case for DLR investment, encourage the continued retention of low-density retail development, and conflict with the planned phased transformation of the area. Suggest removing the reference to the retention of existing retail warehouses and replacing it with a more flexible design-led	This modification was proposed to support the successful transition of the existing retail park into a district town centre. However, the Council agrees that the wording should be amended to ensure the site is optimised through a design-led approach and to avoid premature or prescriptive design solutions, in accordance with London Plan Policy D3. The amended wording will help ensure that the policy does not undermine the principle of transformational, phased development set out in the vision for the area, including the planned DLR extension, while maintaining a flexible approach that enables the site to

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
				approach to buffering that supports the future town centre and residential development. They propose the following amendment: A buffer of well-designed preferably employment or retail uses and other design measures that support/complement the future town centre and residential development should be provided between residential uses and the Strategic Industrial Location both within and adjacent to the site allocation. Non-residential stacked industrial buildings are considered to be the most appropriate typology to provide a buffer. The retention of existing retail warehouses in Gallions Reach Shopping Park is also considered as an appropriate buffer. The design and layout of the site should consider public realm enhancements and avoid habitable rooms and amenity spaces facing industrial uses. Note that flexibility for the transition of the retail park is already provided through other Main Modifications (eg MM26 Policy HS1 Part 2, MM28 HS1.2 Implementation text, and MM29 HS3.1 implementation text) and that the detailed design of buffers should be determined through the masterplanning and design process.	be optimised and responds appropriately to its constraints. The Council suggest the text is modified as follows: A buffer of well-designed suitably scaled preferably employment, or retail uses suitable main town centre uses within the town centre boundary, and other design measures that mitigate amenity impacts in line with agent of change principles support/complement the future town centre and residential development should be provided between residential and other more vulnerable uses, including public spaces, and the Strategic Industrial Locations both within and adjacent to the site allocation. Non-residential stacked industrial buildings are considered to be the most appropriate typology to provide a buffer. The retention of existing retail warehouses in Gallions Reach Shopping Park is also considered as an appropriate buffer. The design and layout of the site should consider public realm enhancements and avoid habitable rooms and amenity spaces facing industrial uses.
MM221	N17.SA1 Beckton Riverside	MMC-E-013	Transport for London	Object to MM221. They consider that retaining existing retail warehouses as an appropriate buffer could undermine the case for DLR investment, encourage the continued retention of low-density retail and car parking, and conflict with the planned phased transformation of the area. They consider that sufficient flexibility for asset management and phased redevelopment is already provided through other Main Modifications and policies (eg MM26 Policy HS1 Part 2, MM28 HS1.2 Implementation text, and MM29 HS3.1 implementation text).	This modification was proposed to support the successful transition of the existing retail park into a district town centre. However, the Council agrees that the wording should be amended to ensure the site is optimised through a design-led approach and to avoid premature or prescriptive design solutions, in accordance with London Plan Policy D3. The amended wording will help ensure that the policy does not undermine the principle of transformational, phased development set out in the vision for the area, including the planned DLR extension, while maintaining a flexible approach that enables the site to be optimised and responds appropriately to its constraints. The Council suggest the text is modified as follows: A buffer of well-designed suitably scaled preferably employment, or retail uses suitable main town centre uses within the town centre boundary, and other design measures that mitigate amenity impacts in line with agent of change principles support/complement the future town centre and residential development should be provided between residential and other more vulnerable uses, including public spaces, and the Strategic Industrial Locations both within and adjacent to the site allocation. Non-residential stacked industrial buildings are considered to be the most appropriate typology to provide a buffer. The retention of existing retail warehouses in Gallions Reach Shopping Park is also considered as an appropriate buffer. The design and layout of the site should consider public realm enhancements and avoid habitable rooms and amenity spaces facing industrial uses.
MM221	N17.SA1 Beckton Riverside	MMC-E-013	Transport for London	Object to the inclusion of the MM221 wording which identifies the retention of existing retail warehouses as an appropriate buffer. They consider this is unnecessary, could constrain design opportunities, and may undermine the ambition for better placemaking and the long-term transformation of the area.	This modification was proposed to support the successful transition of the existing retail park into a district town centre. However, the Council agrees that the wording should be amended to ensure the site is optimised through a design-led approach and to avoid premature or prescriptive design solutions, in accordance with London Plan Policy D3. The amended wording will help

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
				Suggest removing the reference to the retention of existing retail warehouses and replacing it with a more flexible approach to buffering that can be determined through masterplanning and design. They propose the following amendment: A buffer of well-designed preferably employment or retail uses and other design measures that support/complement the future town centre and residential development should be provided between residential uses and the Strategic Industrial Location both within and adjacent to the site allocation. Non-residential stacked industrial buildings are considered to be the most appropriate typology to provide a buffer. The retention of existing retail warehouses in Gallions Reach Shopping Park is also considered as an appropriate buffer. The design and layout of the site should consider public realm enhancements and avoid habitable rooms and amenity spaces facing industrial uses.	ensure that the policy does not undermine the principle of transformational, phased development set out in the vision for the area, including the planned DLR extension, while maintaining a flexible approach that enables the site to be optimised and responds appropriately to its constraints. The Council suggest the text is modified as follows: A buffer of well-designed suitably scaled preferably employment, or retail uses suitable main town centre uses within the town centre boundary, and other design measures that mitigate amenity impacts in line with agent of change principles support/complement the future town centre and residential development should be provided between residential and other more vulnerable uses, including public spaces, and the Strategic Industrial Locations both within and adjacent to the site allocation. Non-residential stacked industrial buildings are considered to be the most appropriate typology to provide a buffer. The retention of existing retail warehouses in Gallions Reach Shopping Park is also considered as an appropriate buffer. The design and layout of the site should consider public realm enhancements and avoid habitable rooms and amenity spaces facing industrial uses.
MM221	N17.SA1 Beckton Riverside	MMC-E-013	Transport for London	Object to the proposed addition <u>The retention of existing retail warehouses in Gallions Reach Shopping Park is also considered as an appropriate buffer</u>, stating that it is inconsistent with London Plan Policies H1B, SD7 and SD8. They also consider it to be inconsistent with MM26 (Policy HS1 Part 2b), which promotes the transition from a car-dependent retail park to an integrated and accessible town centre environment. Suggest the proposed addition should be removed or amended to ensure consistency with the agreed vision for the area and the approach set out in the London Plan and MM26.	The Council does not believe there to be any inconsistency in approach with MM26, as the focus is the loss of the extensive open car parking currently on the site, while the Retail and Leisure Study protects the quantum of comparison retail floorspace on the site. However, the Council agrees that the wording should be amended to ensure the site is optimised through a design-led approach and to avoid premature or prescriptive design solutions, in accordance with London Plan Policy D3. The amended wording will help ensure that the policy does not undermine the principle of transformational, phased development set out in the vision for the area, including the planned DLR extension, while maintaining a flexible approach that enables the site to be optimised and responds appropriately to its constraints. The Council suggest the text is modified as follows: A buffer of well-designed suitably scaled preferably employment, or retail uses suitable main town centre uses within the town centre boundary, and other design measures that mitigate amenity impacts in line with agent of change principles support/complement the future town centre and residential development should be provided between residential and other more vulnerable uses, including public spaces, and the Strategic Industrial Locations both within and adjacent to the site allocation. Non-residential stacked industrial buildings are considered to be the most appropriate typology to provide a buffer. The retention of existing retail warehouses in Gallions Reach Shopping Park is also considered as an appropriate buffer. The design and layout of the site should consider public realm enhancements and avoid habitable rooms and amenity spaces facing industrial uses.
MM222	N17.SA1 Beckton Riverside	MMC-E-033	Thames Water	Welcome the removal of the Thames Gateway Bridge Safeguarding Direction.	Support noted.

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
MM92	N11.SA1 East Beckton Town Centre	MMC-E-044	National Grid Electricity Transmission	Suggests a mapping modification to the Policy NS11.SA1 East Beckton Town Centre map. They recommend adding “sensitive edge (infrastructure)” to show the existing overhead transmission line route. National Grid also comments on the revised approach to site allocation maps, which are now titled ‘Indicative Diagram’ following Main Modification 92. Their rationale is that this change affects the allocations covered by their representation and is therefore relevant to how National Grid infrastructure is represented.	Comment noted. The Council’s position regarding the proposed mapping modification to the N11.SA1 East Beckton Town Centre Indicative Diagram is set out in the Statement of Common Ground with National Grid (SD066). Responses to the subsequent comments concerning other maps and indicative diagrams have been addressed separately and provided directly in relation to those specific representations.
MM92	N8.SA6 Stratford Waterfront South	MMC-E-191	University College London	Modification supported.	Support noted.
MM94	N7.SA1 Abbey Mills	MMC-E-023	Anjuman-e-Islahul-Muslimeen of (London) UK	Object to the current wording relating to the site allocation illustrative diagrams. They consider the policy unjustified because it does not make sufficiently clear that the diagrams are for guidance only and carry no policy weight. They are concerned that the wording could give the diagrams presumptive force and influence the assessment of alternative development proposals. Suggest alternative wording as follows: <u>“Each site allocation includes illustrative diagrams showing one potential way in which development could be delivered. These diagrams are indicative only, have no policy status, and do not form part of the development plan. The delivery of these sites will be shaped through co-designed masterplanning in accordance with policy BFN2 which may demonstrate that an alternative layout could deliver outcomes consistent with the allocation policy and other policies in the Plan, assessed against the written policy requirements. Alternative layouts that deliver outcomes consistent with the allocation policy and other policies in the Plan will be supported.”</u>	The wording change is not supported. The Council does not consider the amendment to MM94 necessary, as this modification was introduced in response to Action Point AP41. The Council’s position on this matter is set out in its response to the Week 5 Hearing Action Points (ED029). The Council does not consider it necessary or justified to amend the wording. The current wording clearly establishes that the illustrative diagrams are indicative and that the delivery of site allocations will be informed through a co-designed masterplanning process. It does not require applicants to demonstrate that an alternative layout would be more appropriate; rather, it promotes a flexible approach to site delivery, with the site maps and illustrative diagrams demonstrating how development could come forward. The Council is therefore satisfied that the Plan remains sound and that no further amendments are necessary..
MM94	Neighbourhoods	MMC-E-008	Hagley Ltd	Modification supported.	Support noted.
MM94	Neighbourhoods	MMC-E-191	University College London	Modification supported.	Support noted.
MM96	N13.SA3 Former East Ham Gasworks	MMC-E-195	Berkeley Group	Welcome the inclusion of the terms “generally” and “of approximately”, which they consider provide greater flexibility in applying tall building height ranges across site allocations. Object to height ranges being treated as fixed limits. They consider this could constrain development where a taller proposal is otherwise justified through design-led assessment and technical evidence.	Support noted.
MM96	N8.SA6 Stratford Waterfront South	MMC-E-191	University College London	Modification supported.	Support noted.

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
Additional Modifications					
AM197	N7.SA1 Abbey Mills	MMC-E-023	Anjuman-e-Islahul-Muslimeen of (London) UK	Object to the requirement for an improved bridge connection to West Ham Station. They consider this unreasonable and unjustified in the absence of evidence demonstrating that such improvements are needed. Suggest replacing the requirement for a new or improved bridge connection with a more flexible approach focused on considering improvements to the existing bridge. They propose the following amendment: “Development should <u>consider improvements to the existing</u> provide an improved bridge connection to West Ham Station.”	This comment does not relate to a proposed Main Modification. The Council's position on this matter is set out in SD030 Newham Local Plan Refresh Regulation 19 Consultation Report: Neighbourhoods Comments and has not changed.
AM198	N7.SA2 Twelvetreets Park and Former Bromley By Bow Gasworks	MMC-E-196	Berkeley Group	Welcome the inclusion of additional wording in Policy BFN4 which allows site-specific viability considerations to be taken into account. Object to the drafting of Site Allocation N7.SA2, arguing that it places emphasis on the conservation of the Grade II listed gasholders without recognising the need for a viable delivery strategy. They consider that redevelopment and long-term conservation of the gasholders are dependent on the viability of the wider regeneration scheme and that the allocation should better reflect this. Suggest reinstating wording from the adopted Local Plan to ensure the allocation explicitly recognises the need for a viable strategy for the listed gasholders. They propose the following wording: <u>“Development will require an assessment of, and an appropriate viable strategy for, the Grade II listed gasholders.”</u>	This comment does not relate to a proposed Main Modification. The Council's position on this matter is set out in the Regulation 18 Consultation Report. The Council's response has not changed.
AM198	N7.SA2 Twelvetreets Park and Former Bromley By Bow Gasworks	MMC-E-196	Berkeley Group	Welcome the requirement for proposals to accord with Local Plan Policy J3. They also welcome the amendments to Policy J3(4), which provide greater flexibility where robust evidence demonstrates there is no current or future demand for employment uses. Object to the use of the term “employment uses” within the site allocation. They consider this to be overly restrictive and insufficiently flexible to respond to changing economic circumstances and emerging sectors. They argue that the wording could prevent development that delivers equivalent or greater employment and economic benefits.	This comment does not relate to a proposed Main Modification. The Council's position on this matter is set out in SD030 Newham Local Plan Refresh Regulation 19 Consultation Report: Neighbourhoods Comments and has not changed.

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
				Suggest replacing references to “employment uses” with “employment-generating uses” within the development principles. They consider this would provide greater flexibility over the lifetime of the Plan whilst continuing to support economic growth, investment and job creation.	
AM217	N8.SA6 Stratford Waterfront South	MMC-E-191	University College London	Suggests amending the policy reference so that it refers specifically to Part 4 of Policy J3, rather than Policy J3 as a whole. They state that Part 4 is the relevant section for developments within site allocations.	This wording change is not supported. The Council does not consider the proposed amendment to be necessary, as the modification was introduced in response to Action Point AP34 (ED024), issued by the Inspector during the Week 3 hearing sessions. The current wording appropriately directs development to comply with Policy J3 and provides a clear and effective policy framework. The Council is satisfied that the Plan remains sound without the proposed amendment.
AM222	N8.SA9 Pudding Mill	MMC-E-217	London Legacy Development Corporation	Modification supported.	Support noted.
AM244	N11.SA3 Alpine Way	MMC-E-181	LAMIT c/ CCLA Investment Management Ltd	Object to AM244. They consider the additional reference to Policy J3 to be unnecessary, as any future planning application would already be required to comply with the adopted development plan, including Policy J3 where relevant. Suggest removing the additional reference to Policy J3, as they consider it to be redundant and not to provide any additional policy requirement or guidance.	This wording change is not supported. The Council does not consider the proposed amendment to be necessary, as the modification was introduced in response to Action Point AP34 (ED024), issued by the Inspector during the Week 3 hearing sessions. The current wording appropriately directs development to comply with Policy J3 and provides a clear and effective policy framework. The Council is satisfied that the Plan remains sound without the proposed amendment.
AM244	N11.SA3 Alpine Way	MMC-E-181	LAMIT c/ CCLA Investment Management Ltd	Objects to replacing “open space” with “green space” as this reduces flexibility and overlooks the role of high-quality hard landscaped public realm. Considers that the existing policy requirements are sufficient to secure greening and biodiversity improvements. Objects to the additional reference to Policy J3, considering it unnecessary and redundant. Suggests retaining the term “open space” to provide greater flexibility in future development design while still ensuring appropriate levels of greening through existing planning policies.	This comment does not relate to a proposed Main Modification. In response to Action Point AP72 (ED029) the Council prepared a modification to the definition of green space in the Plan that reflects the fact that not all parts of parks, woodlands, nature reserves, gardens, allotments, playing pitches, etc will necessarily be “vegetated”. Main Modification MM224 clarifies that green space is not limited to soft landscaping, stating that “Green space may incorporate incidental built features such as paths...”. The revised wording therefore allows for the inclusion of hard landscaped elements within green spaces, while maintaining the Plan’s objective of enhancing greening, biodiversity and the quality of the public realm. Reference to Policy J3 is provided as a cross-reference to relevant plan policies and does not introduce any additional requirements beyond those already contained within the development plan. The inclusion of cross-references to relevant policies is a consistent approach applied across the site allocations in the Neighbourhood chapter. The Council is satisfied that the plan remains sound without the proposed changes.

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
AM245	N11.SA3 Alpine Way	MMC-E-181	LAMIT c/ CCLA Investment Management Ltd	Objects to AM245, which replaces references to “open space” with “green space” in the Alpine Way site allocation (N11.SA3). The change reduces flexibility and does not adequately recognise the role of hard landscaped public realm. Suggest the term “open space” is retained rather than “green space”.	This comment does not relate to a proposed Main Modification. In response to Action Point AP72 (ED029) the Council prepared a modification to the definition of green space in the Plan that reflects the fact that not all parts of parks, woodlands, nature reserves, gardens, allotments, playing pitches, etc will necessarily be “vegetated”. Main Modification MM224 clarifies that green space is not limited to soft landscaping, stating that “Green space may incorporate incidental built features such as paths...”. The revised wording therefore allows for the inclusion of hard landscaped elements within green spaces, while maintaining the Plan’s objective of enhancing greening, biodiversity and the quality of the public realm. The Council is satisfied that the plan remains sound without the proposed change.
Policies Map					
PM4	N2.SA4 Thameside West	MMC-EC-169	Silvertown Homes Ltd	Welcome the inclusion of updated maximum building height parameters in N2.SA4 Thameside West site allocation to reflect the building heights approved under the Hybrid Planning Permission. Object to the proposed changes to the Policies Map (PM4), which identify the heights of individual consented buildings within the site allocation. The representor considers this approach unnecessarily restrictive, unjustified and inconsistent with the approach taken to other strategic site allocations, where broader height parameters are shown across development areas. Object to the Policies Map fixing heights to individual consented buildings, as this could constrain future development, amendments to the Hybrid Planning Permission, and the flexibility expected within a strategic site allocation. Object to the updated Policies Map on the basis that it does not accurately reflect the full extent of the approved Hybrid Planning Permission. The respondent states that only a small number of consented buildings are shown and that a significant proportion of the approved development has been omitted. Note that the Policies Map should provide a strategic framework for future development rather than prescribe development parameters linked to a specific planning permission. They state that, given the long-term delivery of the site and the approval of non-material amendments to date, the development is expected to evolve over time and should retain flexibility. Suggest further amendments to the Policies Map to ensure it aligns with the approved Hybrid Planning Permission, is consistent with the approach taken to other strategic site	This wording change is not supported. We do not consider this change to be necessary as the modification was proposed in order to allow a degree of flexibility whilst reflecting the spatial strategy based on the analysis evidenced in the Tall Building Annex 2024 (EB023) and in the Tall Buildings Topic Paper 2025 (TP004). As set out in the Council's response to Action Point AP14 (ED019) and discussed at the hearing session, the Council included 60m and 100m height zones where buildings of these heights or similar were shown in the parameter plan. However, given the site's low level of accessibility and its proximity to the airport, the Council do not consider appropriate to identify larger areas for heights above 50m in locations that were not considered suitable for taller buildings. This approach is consistent with the tall building assessment evidenced in the Tall Building Annex (EB023). However, the Council considers, the flexibility provided by Policy D4 through Main Modifications MM17 and MM18 will allow the detailed distribution of building heights shown in the parameter plan to be considered and refined at the next stages of the outline planning permission process. This ensures the Plan is justified and is in line with London Plan Policy D9 requirements, London Plan Policy D3, Characterisation and Growth Strategy London Plan Guidance (2023) and Tall Building Annex (EB023). The Council is satisfied that the plan remains sound without the proposed changes.

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
				allocations, and allows flexibility as development comes forward. Suggest that: Building heights are expressed as broader zones across the site allocation rather than as individual building heights; and The approach to building heights reflects the full extent of development approved under the Hybrid Planning Permission. The respondent states that these changes are required to ensure the Local Plan is positively prepared, justified and effective, enable delivery of the full approved scheme, support optimisation of the site allocation, and facilitate the timely delivery of housing.	
PM4	N2.SA4 Thameside West	MMC-EC-169	Silvertown Homes Ltd	Note the Parameter Plan 04 Development Zones Maximum Height Limit has been attached to the representation	Comment noted. The attached Parameter Plan 04 Development Zones Maximum Height Limit has been taken into consideration to inform the changes proposed as response to action point AP14 (ED19) suggested by the Inspector at Week 2 of the hearing session.
Comments not specific to Main Modifications					
N/A	N2.SA5 Excel Western Entrance	MMC-EC-183	International Exhibition Centre Plc (Excel) and designed in partnership with Mount Anvil	Welcome the modifications to the Site Allocation Map for N2.SA5 Excel Western Entrance, particularly the reduction in the area identified as an 'opportunity for green space'. Considers this helps avoid unnecessary constraints on development and supports the delivery of the allocation's objectives. Welcome the modified wording that emphasises enhancing existing green space and recognises Royal Victoria Square as a consolidated and flexible small green space. Supports the additional wording on retaining the existing quantity of green space, improving its functionality, and exploring opportunities to retain original design features of heritage value. Object to the amount of green space shown on the Policies Map. Considers that this it does not accurately reflect the existing extent of green space or what can reasonably be regarded as green space. Concerned that a literal interpretation of the map could constrain development, affect the viability of the allocation, and hinder the delivery of the intended land uses and objectives.	Support noted. This comment does not relate to a proposed Main Modification. The Green Space designation at N2.SA5 (PM34) reflects Action Point AP56 (ED028) and the green space designation set out in ED20. The Council is satisfied that the plan remains sound without the proposed changes.
N/A	N2.SA5 Excel Western Entrance; policies map	MMC-EC-183	International Exhibition Centre Plc (Excel) and designed in partnership with Mount Anvil	Welcome the changes made to the Policies Map since Regulation 19, noting that the proposed modifications are more consistent with the Regulation 18 Policies Map. Suggests that the Policies Map should more closely reflect the adopted Local Plan Policies Map and existing site conditions. Suggests that the Policies Maps should show only the three genuine green spaces and excluding the hardstanding between the pleached trees and the mound, as it functions as a pedestrian route rather than green space. This would improve	This mapping change is not supported. We do not consider this change to be necessary as PM34 was proposed in response to AP56 (ED028) and reflects the green space designation set out in ED20. The representation's concern regarding the inclusion of paths and other infrastructure within the Green Space designation is not supported. In response to Action Point AP72 (ED029) the Council prepared a modification to the definition of green space in the Plan that reflects the fact that not all parts of parks, woodlands, nature reserves, gardens, allotments, playing pitches, etc will necessarily be "vegetated".

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
				accuracy and provide greater certainty for the delivery of the site allocation. Notes that the purpose of the Policies Map is to identify existing green spaces. Notes that an inaccurate green space designation could create uncertainty at the planning application stage and undermine delivery of the site allocation.	The definition of green space (M224) clarifies that green space may incorporate incidental built features, stating that: "Green space may incorporate incidental built features such as paths...". The presence of such features does not undermine the function, purpose or justification of the designation (ED029). The designation is supported by a robust and up-to-date local evidence base, primarily the Green and Water Infrastructure Strategy (GWIS), Newham (2025) [EB061 - EB067]. The Council is satisfied that the plan remains sound without the proposed changes.
N/A	N3.SA1 Royal Albert North	MMC-E-044	National Grid Electricity Transmission	Welcomes the inclusion of conditional text within the Phasing and Implementation sections of Policies N7.SA2 Twelvvetrees Park and Former Bromley and N3.SA1 Royal Albert North. They consider that the wording appropriately recognises National Grid Electricity Transmission (NGET) assets within the sites and provides clarity to developers on the mitigation required to enable effective development.	Support noted. This comment does not relate to a proposed Main Modification.
N/A	N4.SA4 Limmo	MMC-E-222	Ballymore Group	Objects to a conflict between Policy BFN4 (as amended by MM15) and the Limmo Peninsula allocation. They consider that the borough-wide planning obligation prioritisation framework could undermine delivery of the bridge connection identified as necessary to unlock the site. They argue that the bridge is critical enabling infrastructure and essential to achieving the comprehensive development of the allocation. They state that pre-application discussions with the Council and GLA have confirmed the importance of the bridge connection. They consider that the Plan does not provide sufficient clarity on how conflicts between borough-wide viability priorities and site-specific infrastructure requirements should be resolved. As a result, they consider the Plan is not fully consistent or effective in securing delivery of the site. The respondent suggests that the Limmo Peninsula allocation should explicitly identify the bridge and any other required infrastructure as essential enabling infrastructure. They recommend clarifying that such infrastructure may need to be prioritised within viability considerations, even where this differs from the general approach in Policy BFN4. The respondent proposes the following additional supporting text for N4.SA4 (Limmo Peninsula): "The delivery of key enabling infrastructure, including the proposed bridge connection, is essential to unlocking the development of the site. In applying borough-wide viability and planning obligation priorities, regard should be had to the need to secure this infrastructure to ensure the effective and comprehensive delivery of the allocation."	This comment does not relate to a proposed Main Modification. The Council considers this issue is sufficiently addressed via the implementation text for BFN4.3. This allows for a consistent approach across all site allocations.

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
N/A	N7.SA1 Abbey Mills	MMC-E-023	Anjuman-e-Islahul-Muslimeen of (London) UK	Support site allocation.	Support noted.
N/A	N7.SA2 Twelvetreets Park and Former Bromley By Bow Gasworks	MMC-E-044	National Grid Electricity Transmission	Welcomes the inclusion of conditional text within the Phasing and Implementation sections of Policies N7.SA2 Twelvetreets Park and Former Bromley and N3.SA1 Royal Albert North. They consider that the wording appropriately recognises National Grid Electricity Transmission (NGET) assets within the sites and provides clarity to developers on the mitigation required to enable effective development.	Support noted. This comment does not relate to a proposed Main Modification.
N/A	N8.SA8 Bridgewater Road	MMC-E-222	Ballymore Group	The Plan is not fully justified, effective or consistent with national and strategic policy. Object to the Greenway Site of Importance for Nature Conservation (SINC) designation at N8.SA8. Maintain previous concerns regarding the proposed SINC designation. Consider this issue remains unresolved because no Main Modification has been proposed, despite the site's allocation for development and its commitment to deliver substantial green infrastructure through a comprehensive redevelopment scheme.	This comment does not relate to a proposed Policies Map Modification. As set out in the Council's Written Statement for Matter 12 (EW053), the Council considers the SINC designations shown on the Policies Map to be justified, consistent with national policy and in conformity with the London Plan. The proposed SINC designation is supported by the Sites of Importance for Nature Conservation Review (2025) (EB070) and is based on the site's current condition. Furthermore, Policy GWS3 part 6 applies a mitigation hierarchy to development proposals affecting Sites of Importance for Nature Conservation. This approach is in conformity with London Plan Policy G6 (2021) and ensures that biodiversity impacts are appropriately avoided, mitigated or compensated where necessary. The Council is satisfied that the Plan remains sound without the proposed change.
N/A	N8.SA8 Bridgewater Road	MMC-E-222	Ballymore Group	Object to the proposed extension of the Greenway Site of Importance for Nature Conservation (SINC) designation onto the Bridgewater Road site allocation under Policy GWS3 part 6. Consider the designation is not necessary or justified and could create tension between the site's development allocation and environmental designations.	This comment does not relate to a proposed Policies Map Modification. As set out in the Council's Written Statement for Matter 12 (EW053), the Council considers the SINC designations shown on the Policies Map to be justified, consistent with national policy and in conformity with the London Plan. The proposed SINC designation is supported by the Sites of Importance for Nature Conservation Review (2025) (EB070) and is based on the site's current condition. Furthermore, Policy GWS3 part 6 applies a mitigation hierarchy to development proposals affecting Sites of Importance for Nature Conservation. This approach is in conformity with London Plan Policy G6 (2021) and ensures that biodiversity impacts are appropriately avoided, mitigated or compensated where necessary. The Council is satisfied that the Plan remains sound without the proposed change.
N/A	N8.SA8 Bridgewater Road	MMC-E-222	Ballymore Group	Welcome the flexibility introduced through the wider amendments to the tall buildings strategy. Suggest amending the site allocation wording to provide greater clarity on the intended distribution of building heights across the site and to ensure consistency with the amended approach to building heights elsewhere in the Plan. Suggest the following modification:	No objection to the proposed wording, although it is not considered necessary for soundness.

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
				[..] Building heights should generally range between 21-32m (approximately 7-10 storeys), with taller buildings of approximately up to 50m (approximately 16 storeys) in the east and south-east of the site and approximately 60m in the west of the site (approximately 20 storeys) to aid wayfinding. [...]	

14. Glossary

Modification Reference	Part of the Plan	Representation Reference	Representor	Summary	Response
Main Modifications					
MM224	Green space	MMC-E-294	Sport England	Modification supported.	Support noted.