



# **Statement of Common Ground**

**Between**

**London Borough of Newham**

**And**

**Transport for London**

**Stage: Newham Submission Draft Local Plan (Reg. 19)**

**Date: 4<sup>th</sup> April 2025**

## **1. Executive Summary**

- 1.1. A statement of common ground is a written record of the progress made by plan-making authorities during the process of planning for strategic cross-boundary matters. It documents the strategic matters where effective cooperation has led to cross-boundary challenges and opportunities being identified, whether there is agreement between bodies in how these should be addressed, and how the strategic matters have evolved throughout the plan-making process. It is also a way of demonstrating at examination that plans are deliverable over the plan period, and based on effective joint working across local authority boundaries.
- 1.2. This Statement of Common ground addresses key strategic matters between the two signatories, the London Borough of Newham and Transport for London, as relevant to the preparation of the Newham Submission Draft Local Plan and its progression to public Examination.
- 1.3. Strategic matters overseen by other organisations will be addressed in other SoCGs, in order to streamline the process of reaching agreements with each party. Where key strategic issues overlap between different organisations that Newham have signed statements of common ground with (e.g. the delivery of housing targets), these interrelations are summarised in the [Duty to Cooperate Statement](#) (2024) and the Duty to Cooperate Addendum (2025).
- 1.4. The document is intended to be 'live', updated as circumstances change. Please see the Governance Arrangements section of the statement for more details.

## **2. Parties Involved**

- 2.1. Newham Council, the Local Planning Authority for the London Borough of Newham, which is an inner London Borough in East London situated between three rivers: the Lea to the west, Thames to the south and Roding to the east. London Borough of Newham is bordered by several other London Boroughs, including Tower Hamlets, Hackney, Waltham Forest, Redbridge, and Barking and Dagenham. Across the River Thames lies the Royal Borough of Greenwich.

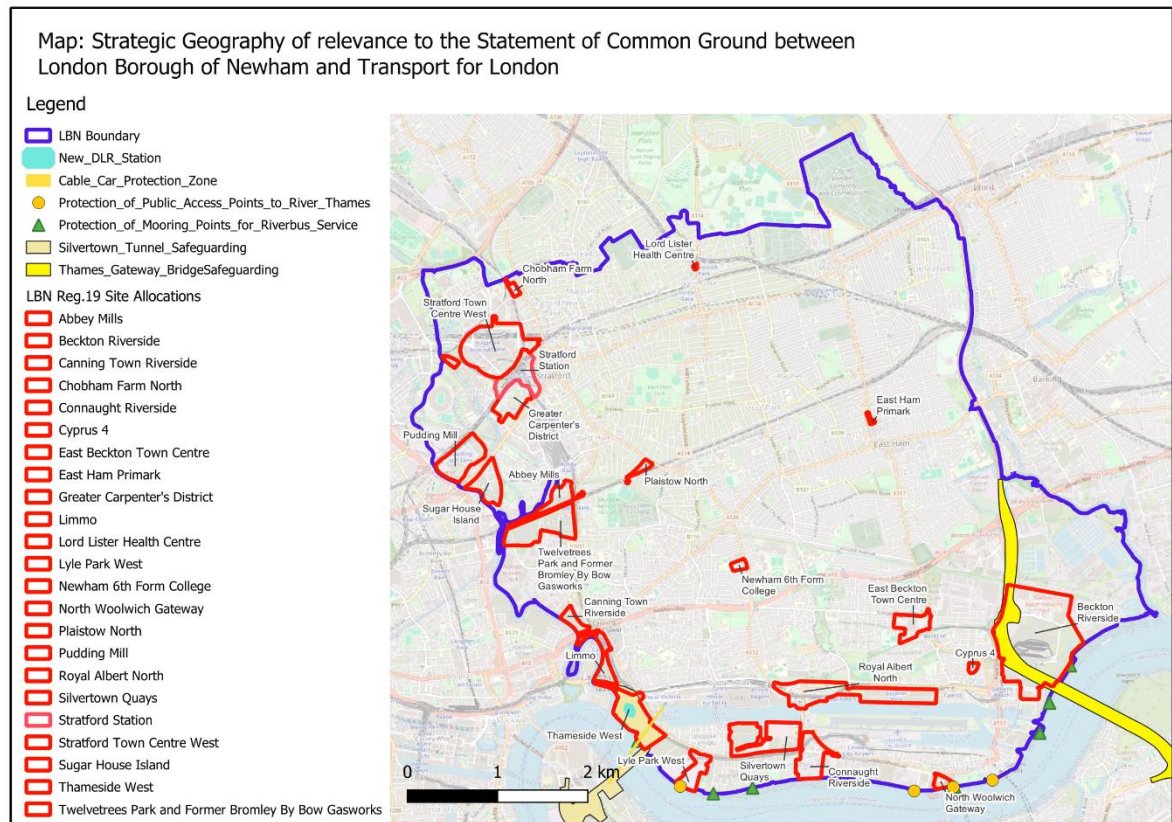
AND

- 2.2. Transport for London (TfL), the transport operator and highway authority in the area and the integrated transport authority responsible for the implementation of the Mayor's Transport Strategy (2018). The Strategy aims to achieve an 80 per cent sustainable mode share target across London by 2041 and uses the 'Healthy Streets Approach' and Vision Zero with overarching aim of enabling more people to travel by walking, cycling and public transport. This is crucial to achieving sustainable growth, as in years to come more people and goods will need to travel on a relatively fixed road network.
- 2.3. Newham is strategically located at the intersection of the London-Stansted-Cambridge-Peterborough Corridor, which is centred on enterprise and innovation within emerging sectors such as digital, media, life sciences, telecommunications and advanced manufacturing, and the Thames Estuary Creative and Cultural Industries Corridor, which adds to the borough's significance. It contains three Opportunity Areas: the Olympic Legacy (which also includes

parts of the other Host Boroughs) Poplar Riverside (which crosses the boundary with Tower Hamlets) and Royal Docks and Beckton, which is also the home of London's only Enterprise Zone and Europe's largest regeneration area.

### 3. Strategic geography

- 3.1. The map below identifies the spatial representation of the key strategic matters addressed, alongside the administrative area of the plan-making authority – London Borough of Newham.



- 3.2. Newham's administrative boundaries also contain 65% of the London Legacy Development Corporation (LLDC) area, which acted as the planning authority for the Queen Elizabeth Olympic Park and surrounding area until the return of planning powers to the boroughs on 1<sup>st</sup> December 2024. As such, key strategic matters for the parts of the LLDC Mayoral Development Corporation that fall within Newham's administrative boundaries are also addressed in the Newham Submission Draft Local Plan, and are subject to the matters addressed in this statement of common ground. Where relevant, the Newham draft Local Plan has retained and evolved site allocations and designations from the LLDC Local Plan (2020).
- 3.3. As outlined in the Sustainable Transport Strategy (2024), Newham has substantial transport infrastructure connecting it to other boroughs and the wider region, including major roads, Underground and railway lines, as well as the River Thames and Lea. The borough has a very high public transport mode share at around 40 per cent, almost six per cent higher than the inner London average.

## 4. Background

- 4.1. Newham Council prepared the Submission Draft Local Plan and published it for consultation between 19<sup>th</sup> July and 20<sup>th</sup> September. This is the version of the plan that the Council considers to be 'legally compliant' and 'sound' and will be submitted to the Planning Inspectorate for examination in 2025. The council undertook two rounds of consultation prior to this, to inform the Newham Submission Draft Local Plan. These were:
- Issues and Options Consultation, which took place between 18 October and 17 December 2021; and
  - Draft Local Plan Consultation (Regulation 18), which took place between the 9 January and 20 February 2023.
- 4.2. A [Duty to Cooperate Statement](#) (DtC Statement) was published as part of Newham's Reg. 19 consultation, which provides a summary of London Borough of Newham's engagement with Transport for London, as a duty to cooperate partner, as part of the preparation of the new Newham Local Plan. The table below provides an extract of the relevant key strategic matters identified as part of this process and the corresponding paragraphs in the Duty to Cooperate Statement.

Key Strategic Matter	DtC Statement relevant paragraphs
Beckton Riverside capacity and DLR extension	4.102 - 4.109
Stratford Station	4.112-4.115, 4.117-4.119
Sustainable Transport Strategy	4.131-4.140
Beckton Sewage works odour	4.160-4.166

- 4.3. The national and regional policy context forming the background to this statement of common ground is also detailed in the Duty to Cooperate Statement (2024), under 'Chapter 2: Legislative and national policy context' and 'Chapter 3: Demonstrating compliance with the duty to cooperate'.
- 4.4. During the Reg. 19 consultation process, Transport for London submitted comments to Newham that raised the following additional matters:
- Inclusion in Newham's Local Plan of planned future schemes connecting London Boroughs of Newham and Barking and Dagenham – DLR extension from Gallions Reach to Barking, and the Lower Roding Crossing;
  - Non-alignment of policy BFN4.3 of the Newham Local Plan with the London Plan Policy DF1.D - how planning obligations for public transport will be prioritised and secured.
  - Delivery of transport infrastructure through policy and site allocations, including river piers, and step-free access.
- 4.5. Further, Newham Council also received comments from National Highways that raised concern as to whether the traffic modelling supporting the Local Plan's spatial strategy identified impacts on regional junctions on M25, M11 or the A13.

- 4.6. Following review of the above matters, London Borough of Newham invited Transport for London to begin discussions towards the signing of this Statement of Common Ground.
- 4.7. A meeting was held on 20<sup>th</sup> January 2025 to discuss the key strategic matters, and the agenda and notes of this meeting are attached as Appendix 1 and provide further background information. During this meeting, it was agreed that TfL had no further concerns or required any further action with regards to how the Newham Local Plan references the planned future cross-borough transport schemes which do not yet have a fixed route (i.e. the DLR extension from Gallions Reach to Barking, and the Lower Roding Crossing) and the scope of Newham's Sustainable Transport Strategy.
- 4.8. Following the meeting, Newham shared the draft responses to TfL's Reg. 19 consultation comments for consideration, and further written engagement took place, which is summarised in the relevant key strategic matters below and details are attached in Appendix 2.

## **5. Key Strategic Matters**

### **5.1. Beckton Riverside transport interventions, DLR business case and phasing**

- 5.2. In December 2019, a DLR extension to Thamesmead was formally proposed by Transport for London as part of the draft Thamesmead and Abbey Wood Opportunity Area Planning Framework (OAPF). The Royal Docks and Beckton Riverside OAPF (2023) continued to highlight the important role of this DLR extension, with one of the key objectives of the OAPF to outline the opportunities associated with a future DLR extension to Beckton Riverside and how these could be supported.
- 5.3. Development sites on both sides of the river currently have very low levels of public transport accessibility, and an extension of the DLR was considered the best way to improve this. The extension would also deliver an additional, sustainable crossing of the River Thames in east London. Whilst there is currently also Statutory Safeguarding for a road crossing, known as the Thames Gateway Bridge over the section of the River Thames between Beckton Riverside in Newham and Thamesmead in Greenwich, the scheme is no longer supported by TfL and discussions are ongoing with the Department for Transport over the future of the Safeguarding Directions.
- 5.4. In May 2023 Newham's Cabinet approved the submission of the Strategic Outline Case for the Thamesmead and Beckton Riverside Public Transport Programme to Government by Transport for London on behalf of the Programme partners and approved £500k contributions to the programme over the next 4 years, as part of an overall funding package of £10-12m by the Government and other stakeholders, in order to enable further feasibility work for public transport interventions and develop a comprehensive business case and consents programme.
- 5.5. On 26 April 2023 Royal Greenwich's Cabinet also approved the submission of the Strategic Outline Case for Thamesmead & Beckton Riverside Public Transport Programme to Government by Transport for London on behalf of the Programme partners.

- 5.6. In June 2023 the Strategic Outline Business Case for the extension was submitted to HM Government.
- 5.7. In February-March 2024 TfL consulted on the DLR extension. Part of this consultation also referenced exploring removal of the safeguarding for the Thames Gateway Bridge with the Department for Transport and affected London boroughs.
- 5.8. For Newham, the delivery of the DLR extension is considered vital to unlock the largest site allocation in the Local Plan, Beckton Riverside, as well as enable the creation of a new town centre to replace the out-of-centre retail park at Gallions Reach.
- 5.9. London Borough of Newham also received comments at Reg. 19 from ABRDN<sup>1</sup>, one of the landowners on Beckton Riverside site allocation, which raised concerns with positive planning for this site for a scenario in which the DLR was not funded. London Borough of Newham and Transport for London's shared view is that the policy position is clear in the Submission Draft Local Plan with regards to the trigger points for development on this site, and that the positive joint working towards the delivery of the DLR to unlock the full capacity of both Gallions Reach and Thamesmead mean that there is no need to re-introduce a no-DLR scenario for the site. Further, that due to the positive progress that has been made since the Regulation 19 Local Plan was published, there is also no need for the policy to continue to include the option for alternative methods of improving public transport access for the site. A potential main modification was agreed between Newham and TfL in this regard, which will be proposed to the Inspector.
- 5.10. The main modification was proposed across the Plan, as listed in the table below.

Main modification (any new text in <b>bold</b> and any removed text in <del>strike through</del> )	Part of the Plan (para, imp reference, policy part) etc
<p>...Applications for the development of this site, and their phasing, should consider and relate to the range of potential transport infrastructure changes on this site, in line with the principles outlined below.</p> <p>Until the DLR construction contract is let <del>or a similarly transformative (as confirmed by Transport for London) public transport intervention has confirmed funding:</del></p> <p>- Transformative development activity should only occur in the southern section of the site within easy walking distance of Gallions Reach DLR station, which can be reached via a pleasant and safe route....</p> <p>...Once the DLR construction contract is let <del>or a similarly transformative (as confirmed by Transport for London) public transport intervention has confirmed funding: ...</del></p>	N17.SA1 Beckton Riverside - Existing uses

<sup>1</sup> Note, this is the name under which the representor has submitted comments to Newham's Regulation 19 consultation. They are also known as Aberdeen.

In the northern part of the site, and once the DLR construction contract is let <del>or a similarly transformative (as confirmed by Transport for London) public transport intervention has confirmed funding,</del> building heights should range between 21-32m (ca.7-10 storeys) with taller elements up to 50m (ca. 16 storeys) in limited locations at the new town centre and DLR station.	N17.SA1 Beckton Riverside - Development Principles
In the northern part of the site, and once the DLR construction contract is let <del>or a similarly transformative (as confirmed by Transport for London) public transport intervention has confirmed funding,</del> building heights should range between 21-32m (ca.7-10 storeys) with taller elements up to 50m (ca. 16 storeys) in limited locations at the new town centre and DLR station.	N17.SA1 Beckton Riverside - Design Principles
Until the DLR construction contract is let <del>or a similarly transformative (as confirmed by Transport for London) public transport intervention has confirmed funding:...</del>  ...Once the DLR construction contract is let, <del>or a similarly transformative (as confirmed by Transport for London) public transport intervention has confirmed funding,</del> development should deliver:	N17.SA1 Beckton Riverside - Infrastructure requirements

- 5.11. Further feedback from the landowners was shared with TfL during the SoCG process but TfL's view remained and LB Newham confirmed they were happy to retain the modification.
- 5.12. A further minor modification to policy HS1.2 implementation will be made, as listed in the table below, in order to secure consistency with the site allocation development trigger point criteria.

Minor modification made (any new text in <b>bold</b> and any removed text in <del>strike through</del> )	Part of the Plan (para, imp reference, policy part) etc
In the interim, while key masterplanning decisions are outstanding and particularly until commitment to the new DLR station is <del>known</del> <b>secured such that the development trigger clause of N17.SA1 Beckton Riverside site allocation is met</b> , changes to Gallions Reach Shopping Centre will continue to be managed as an out of centre destination.	HS1.2 Implementation

- 5.13. ABRDN raised a further point that development on their land, in the north of the site allocation, should be able to start to come forward in advance of the DLR funding being secured, as a way to support the business case. London Borough of Newham and Transport for London's shared view is that the development of homes on the northern part of the site would be unsustainable and will undermine the business case for the DLR.

- 5.14. Further, Thames Water have raised new concerns with regards to proximity of residential development to the sewage works. Beckton is home to London (and Europe's) largest sewage processing plant: Beckton Sewage Treatment works. It is located within the Beckton Riverside Strategic Industrial Location and is adjacent to the Beckton Riverside site allocation. As the residential development capacity of the Beckton Riverside site allocation is part of the case for delivering a new DLR station at this location, this matter is of relevance to this statement of common ground.
- 5.15. Due to the timing of both the development of the Opportunity Area Planning Framework and planning application process, which ran alongside the development of the Local Plan, further discussions have taken place throughout 2022, 2023, 2024 and 2025 with Newham's planners, environmental health and regeneration colleagues, the GLA, Thames Water and the landowners regarding the potential odour impact and potential need for an odour impact assessment.

Separate studies have been carried out by St William, ABRDN and Thames Water. It has been agreed by LB Newham, TfL, landowners, GLA and Homes England that an independent verification of the existing studies was required. This is currently being undertaken under the direction of Homes England and LB Newham.

- 5.16. Record of agreements and/or disagreements:
- London Borough of Newham and Transport for London agree that, given the extensive and substantially progressed positive collaborative working being undertaken to bring forward the DLR station at Beckton Riverside, there is now no need for the policy to continue to include the option for alternative methods of improving public transport access for the site.
  - London Borough of Newham and Transport for London agree that allowing early development of the parts of the site with a low PTAL, ahead of the DLR extension construction contract being in place, would constitute unsustainable development and would undermine the business case for the new DLR station's delivery.
  - London Borough of Newham and Transport for London agree that the results of the latest Beckton Sewage Treatment Works Odour Study should be considered by the Thamesmead and Beckton Riverside Steering Group to ensure any required mitigation can be planned for.
- 5.17. **Regional planned growth and impact on station interchanges in Newham - Stratford, Canning Town and West Ham stations.**
- 5.18. Stratford Station, along with Stratford's two bus stations, form a key strategic public transport interchange for London. It has become the fifth busiest station on the entire National Rail network, the sixth busiest station on TfL's network, and is also the busiest bus station in London. Since 2001, Stratford station has seen the largest absolute amount of passenger growth of any station in the UK.
- 5.19. The station was not designed to accommodate the volume of passengers now using it and this has resulted in unacceptable levels of overcrowding, regular station closures and poor passenger experience.



- 5.20. In 2019, the London Legacy Development Corporation (LLDC), Newham, Network Rail and Transport for London (TfL) started to prepare a Strategic Outline Business Case (SOBC) for the long-term redevelopment of the station and the surrounding area to address capacity and connectivity issues.
- 5.21. The Strategic Outline Business Case was submitted to the Government in July 2023. Further work is being undertaken to develop this work and Newham will continue to work with the LLDC (as a Mayoral Development Corporation), London Borough of Waltham Forest and other partners to support this work and to ensure the Local Plan can support the delivery of necessary station infrastructure. Newham is committed to ensure suitable alignment between the emerging Plan and the business case.
- 5.22. The Submission Draft Local Plan includes a site allocation for the Stratford station site, which set out infrastructure requirements and development and design principles for different plots.
- 5.23. Similarly, significant growth continues to be planned through the Local Plans of Newham and its neighbouring Boroughs. Growth along the River Lea in Newham and in Tower Hamlets, together with enhanced connectivity over the river between the two boroughs, is expected to lead to a need for the capacity of Canning Town and West Ham stations to be enhanced. Newham's Sustainable Transport Strategy (2024) also indicated that West Ham station is reaching capacity due to growth in Newham, east London, including London Borough of Barking and Dagenham and London Borough of Tower Hamlets, and Essex along this branch of the rail network.
- 5.24. Newham are in discussions with TfL regarding the need for station expansion and improvements at West Ham and Canning Town. The Sustainable Transport Strategy notes that Newham will work in partnership with Network Rail and TfL, and that we will engage constructively with the Department for Transport regarding funding. Development proposals that will contribute to the exacerbation of the issues will need to provide financial contributions, to be secured via s106. It should be noted that such developments do not necessarily need to be in the proximity of the stations, noting the interchange function of both.
- 5.25. Within their Regulation 19 response, TfL identified that "A small area of land to the north west of West Ham station should be reserved to enable additional station capacity to be provided in the future." Following the meeting in January 2025, TfL shared with Newham the [Essex Thameside Study](#) published by Network Rail, which provides a series of options of how the station upgrades could be facilitated (pg. 58). Newham have reviewed this further information, but consider that at present this information is not sufficient evidence on what improvements would be required at West Ham, and the land required for any improvements, with further feasibility and land owner engagement being required.
- 5.26. However the Council recognises the importance of safeguarding the improvements to West Ham station, and have therefore proposed the following main modification to site allocation N7.SA1 Abbey Mills, which will be proposed to the Inspector:

Main modification (any new text in <b>bold</b> and any removed text in <del>strike through</del> )	Part of the Plan (para, imp reference, policy part) etc
Development should contribute to active and public transport upgrades, including access to and capacity at West Ham and/or Abbey Road Stations. <b>The applicant should engage with TfL at the point of application to see if land is required to enable station upgrades at West Ham station.</b>	N7.SA1 Abbey Mills - Infrastructure requirements

5.27. Record of agreements and/or disagreements:

- London Borough of Newham and Transport for London agree to continue to work together, alongside neighbouring boroughs and other strategic partners, to bring forward capacity enhancements for Stratford, Canning Town and West Ham stations.

5.28. **Delivery of transport infrastructure through policy and site allocations**

5.29. The Newham Local Plan approach to securing planning obligations is to provide the overarching approach through policy BFN4, with any further planning obligations required to deliver specific policies listed under the relevant policy (e.g. T1 for transport infrastructure). Additionally, site-specific clarity is provided through the site allocations' infrastructure requirements, which require the delivery of all types of infrastructure that have already been identified through the evidence base (e.g. the Sustainable Transport Strategy) and are relevant to the site.

5.30. Policy BFN4 of Newham's Submission Draft Local Plan sets out the borough's priorities with regards to securing developer contributions for infrastructure, and states that: *Newham's policy priority is the provision of more social rent homes due to the needs of Newham residents for genuinely affordable, long-term, secure, rented accommodation. 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. The Council will also support the exploration of additional sources of funding to enable the delivery of the required infrastructure.*

5.31. This prioritisation approach is also in Newham's adopted Local Plan (2018) and Newham do not consider there to be any examples where required transport infrastructure has not been delivered as a result of the existing policy. The flexibility for site-specific context to lead to changes in the prioritisation of contributions is reiterated in policy BFN4, and could be used where a piece of transport infrastructure is required for a site to come forward. Transport for London's position in the Regulation 19 response is that London Plan policy DF1.D requires applicants and decision-makers to firstly apply priority to affordable housing and necessary public transport improvements. While TfL acknowledge that there have been some minor amendments to the wording in the implementation text of BFN4.3, they do not consider this is

to be sufficient to ensure soundness and consistency with the London Plan, and recommend that more specific changes are made to the policy to prioritise funding of transport infrastructure.

- 5.32. During the meeting on 20<sup>th</sup> January 2025, Newham clarified in relation to river piers that the Sustainable Transport Strategy found they were not necessary to enable development. As such the Plan safeguards their delivery, but will not look to secure obligations from developments to deliver them, especially where this would draw obligations away from other transport interventions, such as DLR stations. Similarly, London Borough of Newham benefits from excellent step free accessibility, with only four stations in the borough without it. Improving the accessibility of these final four is still something that Newham supports. However, this level of overall access, means improving step-free accessibility is not necessary for a scheme to come forward, which is why it has been removed from the infrastructure requirements, enabling other higher-impact infrastructure requirements to be prioritised.

5.33. Record of agreements and/or disagreements:

- Transport for London do not consider that the flexibilities provided by policy BFN4 implementation text are sufficient to ensure soundness and consistency with the London Plan, and recommend that more specific changes as suggested in Regulation 19 response are made to the policy to prioritise funding of transport infrastructure to align with London Plan policy DF1.D.
- London Borough of Newham considers that policy BFN4.3, in the context of the wider site allocation requirements and specific Policy T1 requirements, is positively prepared and justified and will continue to enable delivery of all necessary transport infrastructure, as demonstrated by the operation under the current Local Plan (2018).
- TfL consider that additional transport infrastructure requirements, even those not required to enable development, but which would be useful to make the development more aligned with Good Growth, should be added to the site allocations.
- London Borough of Newham consider that required infrastructure provision should be focused on requirements needed to enable development, to ensure that sites are also able to deliver wider infrastructure requirements as well as much needed affordable housing.
- London Borough of Newham and Transport for London agree to continue to work together as part of development management processes to identify and secure funding and delivery of key transport infrastructure improvements, including through developer contributions.

5.34. **Impact of development in Newham on the Strategic Road network**

- 5.35. National Highways raised a query at Reg. 19 consultation on the impact of planned development in Newham on the Strategic Road network, specifically the junctions on the M25, where the A13 and the M11 meet the M25. Newham has unpublished data, from SYSTRA modelling work and modelling from the Beckton Riverside and Royal Docks OAPF, which underpinned the Sustainable Transport Strategy (2024) and which indicates that planned growth in Newham will not lead to significant traffic impacts on Newham's or the wider network. This is primarily because the Plan requires car-free development, as well as investment in active travel and public transport.

5.36. TfL notes that National Highways have queried the impact on of the proposed growth on parts of their network. This specific issue was explored through matter 79 of the 2019 Examination in Public of the London Plan and the transport approach of the Plan was found to be justified by the inspectors. As such, TfL's position is local plans examined against the 2021 London Plan should be viewed in this context.

5.37. While circumstances continue to change over time, the development of the next London Plan has now started and TfL will first look to engage National Highways on the issue at a pan-London level, as:

- There are limits to the extent local mitigation alone can manage the traffic impacts of a growing city (though TfL does look to boroughs to minimise the traffic impacts of growth) and some many solutions to minimise growth in traffic need to be planned across the city and beyond; and
- Adding capacity to National Highways roads that enables the flow of traffic into London to grow is not a workable solution for London as it is not possible nor desirable to add the corresponding capacity within London, creating operational, safety and environmental issues on TfL and borough roads

Once this has been explored through the development of the next London Plan, the issue can then be revisited through future local plan revisions with the benefit of a refreshed London-wide context.

5.38. In the case of Newham in particular, TfL notes that the borough is proposing car-free or car-lite development which will help minimise growth in traffic. There is also a considerable distance between Newham and the nearest section of the National Highways network, increasing the likelihood that the impacts of any additional traffic will be more diffused, rather than concentrated on a single part of the road network. It is also worth noting that car ownership in Newham has been on a downward trend since at least 2019, reflecting a wider trend across Greater London. The rate of car ownership at the end of 2023 was 0.53 cars per household, down from 0.62 cars per household in 2019. There has also been a 0.7% decrease in the number of cars registered in Newham from 2022 to 2023.

5.39. Record of agreements and/or disagreements:

- Transport for London support London Borough of Newham's position, and have provided narrative in paragraphs 5.36 and 5.38 regarding the same. If required, TfL has agreed to appear in the Examination to support Newham.

#### 5.40. **Parking standards**

5.41. The London Borough of Newham has received representations as part of the Reg. 19 consultation on the use of London Plan parking standards and the promotion of car-free residential development.

5.42. Newham has maintained its policy approach of car free residential development (except blue badge), in light of London Plan parking standards for inner London boroughs, Opportunity Area modal shift targets, a general policy direction to discourage private car use and high PTAL levels, with further planned investment to improve this further. Nevertheless, in light of comments submitted by TfL that there should be a reference to the Blue Badge parking

requirements in London Plan Policies T6.1 and T6.5, Newham have agreed to make a minor modification to policy T3.1 as set out below, which will aid clarity:

Minor modification made (any new text in <b>bold</b> and any removed text in <del>strike through</del> )	Part of the Plan (para, imp reference, policy part) etc
Developments should provide a quantity of blue badge spaces <b>(in line with London Plan (2021) standards)</b> proportionate to the scale <b>and nature</b> of the development and the quantity of existing blue badge spaces in the local area.	HS1.2 Implementation

5.43. TfL support the approach taken by Newham. Previously, TfL have attended examinations to provide support on this policy approach, and are happy to attend a hearing on this issue if helpful.

5.44. Record of agreements and/or disagreements:

- Transport for London support London Borough of Newham’s position that aligns with London Plan Policy T6B – ‘Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport’. TfL agrees to further support Newham at the Examination, if required, to demonstrate that additional car-parking beyond the London Plan Policy would be detrimental to the delivery of London and Newham’s objectives.

5.45. **Potential for an Elizabeth line station at London City Airport**

5.46. London City Airport, in their representations to the Local Plan, seeks the Council’s support for a privately funded Elizabeth line station to improve access to the airport for staff and passengers.

5.47. Following development of Newham’s Sustainable Transport Strategy, LBN does not require a London City Airport Elizabeth line station to support growth in the Royal Docks. LBN continues to support improvements for surface access to London City Airport by sustainable means for both airport passengers and staff.

5.48. TfL’s position is that the additional Elizabeth line station may lead to increased operating costs for TfL without generating further public transport accessibility and potentially dis-benefitting the existing passengers, and therefore are not supportive.

5.49. Following conversations with TfL, Newham will make the following minor modification to T5.4 to avoid any ambiguity regarding a new Elizabeth line station at London City Airport.

Minor modification made  Please show any new text in <b>bold</b> and any removed text in <del>strike through</del> .	Part of the Plan (para, imp reference, policy part) etc
The Sustainable Transport Strategy indicates that the Council does not require an Elizabeth line station at the airport to facilitate the levels of growth in the Royal Docks. <del>—however the Council would support a privately funded station to improve access to the airport site.</del>	Policy T5.4 Implementation

5.50. Record of agreements and/or disagreements:

- Transport for London agrees with London Borough of Newham's position, and can support Newham at the Examination, if required, to provide details on improvements and mitigation that could support sustainable travel and growth which is possible without an Elizabeth line station.

## 6. Governance agreements

6.1. This statement of common ground will be reviewed:

- 6.1..1. Whenever agreement is reached on any outstanding matters. Or
- 6.1..2. At key milestones in progress towards addressing strategic matters. Or
- 6.1..3. At each subsequent key stage of the plan making process, as it progresses towards adoption.

6.2. The table below outlines existing cooperation forums that will be used to continue to engage each other and progress the key strategic matters.

Key Strategic Matter	Forum	Details/frequency of the forum
Beckton Riverside transport interventions, DLR business case and phasing	Beckton Riverside Steering Group	TBC
Regional planned growth and impact on station interchanges in Newham - Canning Town, West Ham and Stratford Stations	Regeneration processes/business case development/transport and highways work programmes with TfL	TBC

## 7. Signatories

7.1. We confirm that the information in this statement and referred to documents reflects the joint working to date undertaken between London Borough of Newham and Transport for London towards addressing the identified strategic matters.

**Signed on behalf of London Borough of Newham:**



**Name:** Ellie Kuper Thomas

**Date:** 4 April 2025

**Position:** Policy Manager, Planning and Development Directorate

**Signed on behalf of Transport for London:**



**Name:** Josephine Vos

**Date:** 3 April 2025

**Position:** Manager, London Plan and Planning Obligations

# Appendix 1: Agenda and minutes of Statement of Common Ground meeting held on 20<sup>th</sup> January 2025

**Statement of Common Ground between:**

**London Borough of Newham and London Legacy Development Corporation**

**Meeting Date:** 20.01.2025

**Time:** 13:00-14:00

**Venue:** Microsoft Teams

**Present:**

- Ellie Kuper Thomas, Policy Manager, LBN
- James Scantlebury, Senior Planner, LBN
- Rory Douds, Planner, LBN
- Monika Jain, Principal City Planner, TfL Local Plan Programme Lead
- Josephine Vos, TfL, London Plan and Planning Obligations Manager

## Agenda and Notes

Agenda Item	Notes [context, position statements, areas of agreement and/or disagreement]	Actions emerging [what, who, and any deadline]
1. Introductions (2min)	<ul style="list-style-type: none"><li>• Self-introduction by the LBN and TfL teams</li><li>• LBN introduced the objective of the meeting.</li><li>• LBN shared the agenda of the meeting.</li></ul>	
2. Beckton Riverside (15min) a. Transport interventions, DLR business case and phasing b. Beckton Sewage Works odour	<p><b>Transport interventions, DLR business case and phasing</b></p> <ul style="list-style-type: none"><li>• LBN provided an overview of concerns raised by ABRDN at the Regulation 19 consultation:<ul style="list-style-type: none"><li>○ The first concern raised was the need to have a positive planning policy for a scenario in which the DLR was not funded. This scenario was included in the Regulation 18 Local Plan. LBN, in consultation with TfL, agreed that given the importance of this strategic site and the positive joint working taking place to secure the funding, that a categorical refusal of funding within the Plan period would not be forthcoming and therefore removed this scenario from the Regulation 19 Local Plan, ABRDN wants this scenario back.</li></ul></li></ul>	<p>TfL agreed to discuss the wording regarding a flexible transport solution for the Beckton Riverside site with their team, then come back with their stated position for the Statement of Common Ground (SoCG).</p> <p>TfL agreed to discuss the odour issue at Beckton Sewage Works with their team.</p>



	<ul style="list-style-type: none"> <li>○ LBN's view is that the policy position is clear and that the Gallions Reach part of the site would be treated in policy as an out of town shopping centre until the DLR contract is let.</li> <li>○ TfL's view on the merit of including a no-DLR scenario was sought.</li> <li>○ The second issue is ABRDN wants the flexibility to develop the northern part of the site (the Gallions Reach shopping centre) in part for housing either in advance of a contract being let or even in a scenario when a DLR is not forthcoming. ABRDN consider that this would improve the business case for the DLR. LBN's view is that this part of the site has a very low PTAL and the development is entirely reliant on the improvements in PTAL delivered by the DLR extension. TfL's view on the suitability of delivering homes on the northern part of the site allocation in advance of the DLR is sought.</li> <li>○ ABRDN questioned the inclusion in the Regulation 19 Local Plan of 'a similarly transformative (as confirmed by Transport for London) public transport intervention'. LBN clarified that this was included following discussion with TfL to ensure suitable flexibility as the business case was drawn up, for solutions such as a rapid bus transit, which is also being proposed in Greenwich. LBN requested TfL's view on whether this flexibility continues to be suitable, in light of increasing certainty around the DLR being the best possible transport solution.</li> <li>• TfL clarified their position:</li> <li>○ TfL agrees that a no-DLR scenario is not required for the site within this local plan, given the extensive positive collaborative working being undertaken to pursue this option.</li> <li>○ TfL agrees the development of homes on the northern part of the site would be unsustainable and will undermine the business case for the DLR.</li> <li>○ TfL will discuss the flexible transport solution issue with colleagues.</li> </ul>	
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	<p><b>Beckton sewage works</b></p> <ul style="list-style-type: none"> <li>• LBN gave an overview of the Beckton Sewage Works odour issue and the impact on the site: <ul style="list-style-type: none"> <li>○ Thames Water has raised concerns on the level of development in proximity of Beckton Sewage Works, due to potential odour issues. Homes England has commissioned an independent odour study. LBN have already had odour studies from Thames Water and St William, with varying results.</li> <li>○ The results of the study would be fed into the Thamesmead and Beckton Riverside Steering Group to ensure the DLR project could consider any required mitigation.</li> </ul> </li> <li>• TfL clarified their position: <ul style="list-style-type: none"> <li>○ TfL agreed to raise this issue with colleagues and agreed it would be useful to reflect the ongoing collaborative work on this in the Statement of Common Ground.</li> </ul> </li> </ul>	
<p>3. Regional planned growth and impact on station interchanges in Newham - Canning Town, West Ham and Stratford Stations (5min)</p>	<ul style="list-style-type: none"> <li>• LBN gave an overview of three major interchanges: <ul style="list-style-type: none"> <li>○ Stratford, Canning Town and West Ham Stations are almost at full or over capacity. The Local Plan outlines where improvements are needed at these interchanges.</li> <li>○ In their TfL Regulation 19 consultation response TfL suggested a small area North West of West Ham Station should be reserved for such an improvement.</li> <li>○ As part of the development of the Sustainable Transport Strategy in summer 2023, LBN had asked TfL if they had more details about upgrades/expansions at Canning Town and West Ham – however this information was not available.</li> <li>○ LBN want to understand if plans have moved forward and the scale of this area of land. This will help LBN to understand the need to safeguard it for TfL.</li> <li>○ These stations are also key regional transfer stations. Therefore, LBN wanted to know the extent to which TfL is collecting contributions towards those stations more broadly, rather than in the immediate vicinity of developments. It's LBN's view that this should be proportionate to the</li> </ul> </li> </ul>	<p>TfL agreed to come back with further details on the scale of the area of land near West Ham Station.</p> <p>TfL will also provide LBN with a list of sites where they have asked for developer contributions to contribute towards these station improvements.</p>

	<p>uplift in passenger numbers caused by interchange passengers from developments in the wider area who use these interchanges to connect to the wider London transport system.</p> <ul style="list-style-type: none"> <li>• TfL clarified their position: <ul style="list-style-type: none"> <li>○ TfL agreed to provide an update on: <ul style="list-style-type: none"> <li>- details on the scale of the area of land adjacent to West Ham station</li> <li>- information regarding future station capacity and upgrade/expansion at Canning Town and West Ham</li> </ul> </li> <li>○ TfL outlined that developer contributions are site-specific. So, if there isn't a local station identified in the site specific assessment, they won't collect development contributions. If a site is more reliant on bus routes rather than stations, then they would go for bus contributions. TfL further explained that the further removed a station is from the development, the harder it is to make the case for developer contributions for that station - despite the impact on capacity on the station as a major interchange.</li> <li>○ TfL offered to give LBN a list of sites they have asked for developer contributions from to support the interchange stations.</li> </ul> </li> </ul>	
<p>4. Inclusion in Newham's Local Plan of planned future schemes (5min)</p> <ol style="list-style-type: none"> <li>a. The Lower Roding crossing</li> <li>b. DLR rail extension from Gallions Reach to Barking</li> </ol>	<ul style="list-style-type: none"> <li>• LBN gave an overview of two future projects - <ul style="list-style-type: none"> <li>○ The Lower Roding Crossing (an active travel and bus transit bridge) being brought forward by the London Borough of Barking and Dagenham, and the potential of a DLR extension from Gallions Reach to Barking.</li> <li>○ Both projects were included in the Sustainable Transport Strategy as long term projects. However, they have not been included on the maps in the Local Plan, as they don't have specific routes yet, and there are outstanding objections to some of the proposed routes. LBN's view is that supporting policy text would be sufficient to explain these projects and our support for them, especially as they are unlikely to come forward in the lifetime of the Local Plan.</li> </ul> </li> </ul>	No further actions required

	<ul style="list-style-type: none"> <li>○ LBN raised they were aware of TfL's request for these to be mapped in their Regulation 19 consultation response.</li> <li>○ Given the rationale provided for the approach taken, LBN asked for TfL to clarify their position on this issue.</li> <li>• TfL clarified their position: <ul style="list-style-type: none"> <li>○ TfL prefer these to be mapped in the Local Plan as they help TfL to acquire developer contributions toward such projects. For example, TfL struggled to get sustainable cycle network funding without a map showing the cycle network in the vicinity of the development.</li> <li>○ Despite these difficulties, TfL appreciated the reasoning for LBN not including the projects on maps in the Local Plan and accepted LBN's approach of using supportive text in the Local Plan and with more detail provided in the Sustainable Transport Strategy.</li> <li>○ TfL agreed they had no further queries or concerns regarding the inclusion in Newham's Local Plan of planned future schemes.</li> </ul> </li> </ul>	
5. Sustainable Transport Strategy (5min)	<ul style="list-style-type: none"> <li>• LBN gave an overview of Sustainable Transport Strategy: <ul style="list-style-type: none"> <li>○ The Sustainable Transport Strategy has now been adopted, and has informed LBN's Local Implementation Plan (LIP) and evidence base for the Local Plan. The Sustainable Transport Strategy now sits with our transport team and helps to guide future projects.</li> <li>○ LBN did make some changes to the Sustainable Transport Strategy following feedback from the consultation. Those changes can be viewed in the Sustainable Transport Strategy available on our <a href="#">website</a>.</li> </ul> </li> <li>• TfL agreed they had no further queries or concerns regarding the Sustainable Transport Strategy.</li> </ul>	No further actions required
6. Delivery of transport infrastructure through policy and	<ul style="list-style-type: none"> <li>• LBN raised comments made by TfL and the GLA during the Regulation 19 consultation on the delivery of transport infrastructure through Local Plan policy.</li> </ul>	LBN agreed to draft a statement on how planning obligations in Local Plan policy

<p>site allocations (15min)</p> <ul style="list-style-type: none"> <li>a. Prioritisation of transport relative to other infrastructure</li> <li>b. Planning obligations not in policy</li> <li>c. River Piers</li> <li>d. Step-free access at Plaistow Station</li> </ul>	<p><b>Prioritisation of transport relative to other infrastructure</b></p> <ul style="list-style-type: none"> <li>• LBN gave an overview of the prioritisation of transport infrastructure: <ul style="list-style-type: none"> <li>○ LBN acknowledge the representation raised by TfL that the Local Plan wasn't in conformity with the London Plan on the prioritisation of transport infrastructure relative to the delivery of other infrastructure and planning obligations.</li> <li>○ LBN stated that the prioritisation in the Plan reflects the Council's objectives but that there is flexibility in the supporting text, which states: <i>Newham's policy priority is the provision of more social rent homes due to the needs of Newham residents for genuinely affordable, long-term, secure, rented accommodation. 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. The Council will also support the exploration of additional sources of funding to enable the delivery of the required infrastructure.</i> This flexibility could be used where a piece of transport infrastructure is required for a site to come forward. In addition, this prioritisation approach is in Newham's adopted Local Plan and Newham do not consider there to be any examples where required transport infrastructure has not been delivered as a result of the existing policy.</li> <li>○ LBN reassured TfL that key transport infrastructure planning obligations are recognised in the development management process and that the new local plan is more specific on where sites need transport interventions, which should help this process further.</li> </ul> </li> </ul>	<p>work, as part of the SoCG, and share with TfL to confirm if they consider it to be adequate to secure the obligations.</p> <p>TfL agreed to review with team the importance of River Piers for access to developments, then clarify their position with LBN.</p>
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	<ul style="list-style-type: none"> <li>• TfL clarified their position: <ul style="list-style-type: none"> <li>○ That transport infrastructure should be prioritised, as the overall quantum of housing will be lower without transport infrastructure investment, meaning less affordable housing.</li> <li>○ TfL retained their concerns regarding the prioritisation of transport relative to other infrastructure.</li> </ul> </li> </ul> <p><b>Planning obligations not in policy</b></p> <ul style="list-style-type: none"> <li>• LBN clarified their position: <ul style="list-style-type: none"> <li>○ LBN raised TfL's request for planning obligations to be in policy. LBN responded to TfL by explaining that we took a different approach in the Local Plan. LBN included the general requirement for schemes to deliver developer contributions at the start of the Local Plan in policy BFN4. The obligations required to deliver specific policies are listed under the relevant policy, in this case T1.</li> <li>○ LBN suggest setting out in the SoCG how this policy approach works, allowing TfL to review and confirm they consider it to be adequate to secure the obligations.</li> </ul> </li> <li>• TfL agreed to review such a statement and confirm if they consider it to be adequate to secure the obligations.</li> </ul> <p><b>River Piers</b></p> <ul style="list-style-type: none"> <li>• LBN gave an overview of the Plan's approach to River Piers: <ul style="list-style-type: none"> <li>○ Explaining that the Sustainable Transport Strategy found they weren't necessary to enable development and as such were not prioritised for investment where resources are limited.</li> <li>○ As such the Plan safeguards their delivery but will not look to secure obligations from developments to deliver them, especially where this would draw obligations away from other transport interventions, such as DLR stations.</li> </ul> </li> <li>• TfL clarified their position on River Piers: <ul style="list-style-type: none"> <li>○ TfL's position as set out in the response is still the same on this issue, but they would like to clarify the importance of River Piers</li> </ul> </li> </ul>	
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	<p>for access to developments with colleagues.</p> <p><b>Step free Access</b></p> <ul style="list-style-type: none"> <li>• LBN overview of step free access: <ul style="list-style-type: none"> <li>○ LBN has excellent step free accessibility, with only four stations in the borough without it. Improving the accessibility of these final four is still something that LBN support. However, this level of overall access, means improving step-free accessibility is not necessary for a scheme to come forward. Which is why it has been removed from the infrastructure requirements, enabling other higher-impact infrastructure requirements to be prioritised.</li> </ul> </li> <li>• TfL clarified their position: <ul style="list-style-type: none"> <li>○ TfL understand LBN's position.</li> <li>○ TfL continue to push for more step free access following the Mayor of London's manifesto pledge for 50% of Underground stations to have step free access.</li> </ul> </li> </ul>	
7. National Highways' data request (10min)	<ul style="list-style-type: none"> <li>• LBN gave an overview of the issue raised by National Highways: <ul style="list-style-type: none"> <li>○ National Highways made a query on the impact of development in Newham on the Strategic Road network, specifically the junctions on the M25, where the A13 and the M11 meet the M25. LBN has data from SYSTRA modelling work and modelling from the Beckton Riverside and Royal Docks OAPF which underpin the Sustainable Transport Strategy.</li> <li>○ LBN asked TfL for assistance on understanding where this issue has come from and their response to it.</li> </ul> </li> <li>• TfL clarified their position on National Highway's data request: <ul style="list-style-type: none"> <li>○ TfL has found National Highways are highlighting growth in London as a major impact on the capacity of highways.</li> <li>○ National Highways want policy changes to mitigate impacts and make infrastructure improvements.</li> <li>○ This has been raised by National Highways with other LPAs. TfL's position is the modelling that conducted for the London</li> </ul> </li> </ul>	<p>TfL agreed to support Newham to demonstrate that growth will not have an impact on the National Highways network, and are happy to attend a hearing on this issue if needed.</p>

	<p>Plan is fit for purpose and demonstrates limited impact on National Highway's network from growth in London, due to car free or car lite development.</p> <ul style="list-style-type: none"> <li>○ TfL's position is to support LPAs to demonstrate their growth will not have an impact on highways. Some boroughs offered new modelling to National Highways as evidence of their lack of impact on the M25 and others made policy modifications to make mitigations.</li> </ul>	
<p>8. AOB and next steps (5min)</p> <p>a. Parking standards push back (Reg 19 comments)</p> <p>b. London City Airport Elizabeth line station (Reg 19 comments)</p>	<p><b>Parking standards push back</b></p> <ul style="list-style-type: none"> <li>● LBN gave an overview on the representation from Ballymore on parking standards: <ul style="list-style-type: none"> <li>○ Ballymore said potential residents want car parking, however LBN policy is a car free development, except blue badge or other mitigations.</li> </ul> </li> <li>● TfL clarified their position: <ul style="list-style-type: none"> <li>○ TfL explained in the past they have attended examinations to provide support on this policy approach, and are happy to attend a hearing on this issue if needed.</li> <li>○ TfL agreed to provide wording in the SoCG to support LBN policy.</li> </ul> </li> </ul> <p><b>London City Airport (LCY) Elizabeth line station</b></p> <ul style="list-style-type: none"> <li>● LBN gave an overview on the LCY Elizabeth line station: <ul style="list-style-type: none"> <li>○ LBN do not require an LCY Elizabeth line station to support growth in the Royal Docks.</li> <li>○ LCY continue to push for this station</li> <li>○ LBN requested that TfL clarify their position on the Elizabeth line station, providing a statement in the SoCG that supports LBN policy.</li> </ul> </li> <li>● TfL clarified their position: <ul style="list-style-type: none"> <li>○ The Elizabeth line station may lead to increased operating costs for TfL, therefore are not supportive. TfL to check with team and then add wording to the SoCG.</li> </ul> </li> </ul> <p><b>Next steps</b></p>	<p>TfL agreed to discuss the issues raised with the team and provide a statement regarding TfL's position on parking standards and the London City Airport Elizabeth line station to be added to the SoCG.</p> <p>LBN agreed to share the full responses to Regulation 19 comments where "no change has been made in response to this point". This is to be appended by LBN in the SoCG.</p> <p>LBN to share this meeting's notes within a couple of weeks, then the draft SoCG by the end of February.</p>



	<ul style="list-style-type: none"> <li>○ LBN to provide a full response to all of Tfl's Regulation 19 comments which can be appended in the SoCG.</li> <li>○ LBN – share minutes and circulate to Tfl for review.</li> </ul>	
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**Appendix 2 – TfL Comments to on Newham’s Submission Draft Local Plan (Reg. 19), and Newham’s responses and proposed modifications to address matters raised.**

Policy/Clause	Site Allocation	<b>Transport for London Comment</b>  Red text in a comment refers to maps, diagrams or other documents provided as part of the representation  Blue text in a comment is a quote of TfL's Regulation 18 representation	<b>Transport for London Proposed modifications and explanation</b>	<b>LB Newham Response</b>	<b>LB Newham Modification</b>
		<p>Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a 'without prejudice' basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments do not necessarily represent the views of the Greater London Authority (GLA). A separate response has been prepared by Places for London to reflect TfL's interests as a landowner and potential developer.</p> <p>Thank you for giving TfL the opportunity to comment on the Regulation 19 version of the Newham local plan.</p>		Comment noted.	

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		<p>The London Plan was published in March 2021. Local plan policies and site allocations should be developed in line with relevant London Plan policy and TfL's aims as set out in the Mayor's Transport Strategy. In particular, it is important that local plans support the Healthy Streets Approach, Vision Zero and the overarching aim of enabling more people to travel by walking, cycling and public transport rather than by car. This is crucial to achieving sustainable growth, as in years to come more people and goods will need to travel on a relatively fixed road network.</p>		Comment noted.	
		<p>We welcome the positive changes made to the Local Plan in response to our comments at the Regulation 18 stage of consultation.</p>		Support noted.	
		<p>We also welcome the continued support for public transport and active travel improvements, including major projects at Stratford station and potential DLR extensions.</p>		Support noted.	

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		We are pleased to note the commitment to a network of well-connected neighbourhoods across the borough, implementation of Low Traffic Neighbourhoods and School Streets, and adoption of the Healthy Streets Approach.		Support noted.	
		We strongly support the requirement for all development to be car free and also welcome the addition of references to locally specific mode share targets and the Mayor's Vision Zero road safety objective.		Support noted.	
		However, there are a few outstanding issues that we believe need to be addressed to ensure soundness and consistency with the London Plan including a more positive approach towards securing contributions towards transport improvements.		Comment noted.	

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		We have also identified a number of sites where there is a potential interface with TfL infrastructure which may not be apparent. For those sites we think it would be helpful to add an additional requirement to consult with TfL Infrastructure Protection at the pre application stage.		Comment noted. Individual responses are provided to the proposed additional wording outlined in your representation.	
		We have updated the detailed comments we made at the Regulation 18 consultation reflecting changes made to the Regulation 19 version of the Local Plan. These are included in the final column of the table in appendix A, below. <b>Appendix B [Appendix B – Plans of TfL Infrastructure (forms part of TfL Reg. 19 response to Newham Local Plan)] in a separate attachment contains plans showing TfL infrastructure.</b>		Comment noted.	
BFN1 Spatial Strategy		We welcome the amended wording in part 1ai in relation to the DLR extension.		Support noted.	

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BFN2 Co-designed masterplanning		We welcome the new wording in the implementation text of BFN2.2.		Support noted.	

BFN4 Developer contributions and infrastructure delivery		<p>Although there have been some minor amendments to the wording in the implementation text of BFN4.3, this is not sufficient to ensure consistency with London Plan DF1D which specifically identifies necessary public transport improvements as a priority alongside affordable housing.</p>	<p>We recommend that part 1b is amended to read ‘as necessary, enter into section 106 agreements to provide affordable housing, necessary public transport improvements and any other requirements to mitigate impacts arising’ and part 3a is amended to read ‘affordable and family housing and necessary public transport improvements’. In the implementation section the second paragraph of BFN4.1 should be amended to read: ‘Section 106 planning obligations will be sought for affordable housing, necessary public transport improvements and additional contributions...’ This amendment is necessary to ensure soundness and consistency with the London Plan.</p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the Plan is already considered sufficiently flexible to enable to delivery of infrastructure, with the implementation text of policy BFN4.3 already allowing for site level flexibility when the provision of infrastructure is required by the site allocation and/or an infrastructure provider.</p> <p>This prioritisation approach is also in Newham’s adopted Local Plan (2018) and Newham do not consider there to be any examples where required transport infrastructure has not been delivered as a result of the existing policy.</p> <p>The flexibility for site-specific context to lead to changes in the prioritisation of contributions could be used where a piece of transport infrastructure is required for a site to come forward. The Council is satisfied that the plan remains sound without the proposed changes.</p>	
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D2 Public Realm Net Gain		We welcome the changes made to the wording of D2 to refer to Active Travel Zone Assessments and to provide a link to relevant TfL guidance, confirmation that car parking space is excluded from public realm net gain and the addition of the reference to London Plan Policy T2 in the policy links.		Support noted.	
HS7 Delivery-led businesses		We reiterate support for the requirements in part 3 b and c and part 4 d and e which are further explained in the implementation section.			

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T1 Strategic transport /T1.1		<p>Although we welcome the change to wording in part 1.b.iii and T1.1 – Buses, we recommend that the word ‘depots’ is replaced by ‘garages’ as set out in our Regulation 18 representation because this is the term more commonly used by TfL.</p>		<p>Support noted.</p> <p>The Council notes the proposed modification to replace ‘depots’ with ‘garages’. This is not considered necessary for soundness. However the Council supports the ‘garages’ wording to clarify this, while noting that ‘transport depot’ wording is used throughout the Plan.</p> <p>The Council recognises the importance of ensuring the Plan is factually accurate and has therefore made the following wording change which is included in the minor modification table.</p>	<p>Buses – priority measures, stands (including drivers’ facilities), stations and depots/<b>garages</b></p>

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T1 Strategic transport / T1.1		[It would be helpful if section T1.1 could also refer to projects and interventions that support delivery of TfL's Bus Action Plan] We note that no change has been made in response to this point.		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council's response has not changed.	
T1 Strategic transport / T1.1		[We suggest that the word 'negatively' is inserted at the end of the third sentence in T1.1. Alternative wording could be 'should demonstrate that negative impacts on the strategic transport infrastructure are minimised.'] We welcome revised wording in the second sentence in T1.1 to address this point.		Support noted.	

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T1 Strategic transport / T1.2a		We welcome the addition of a reference to active travel in part 2.a		Support noted.	

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T1 Strategic transport		[We welcome the reference to planning obligations being used to deliver strategic transport improvements, although this may be better included as part of the core policy] We note that no change has been made to address this point		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as we consider that policy T1 part 1c and the planning obligations text which supports policy T1, read alongside BFN4 are considered sufficient hooks for the obligation.</p> <p>This is the approach taken to all obligations in the Plan and is considered sufficiently deliverable. The Council is satisfied that the plan remains sound without this change.</p>	

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T1 Strategic transport		[Reference to step-free access at existing/new infrastructure would be welcomed, although this will need to be funded through planning obligations or other funding sources because TfL is not able to commit funding at the current time.] We note that no change has been made to address this point.		Comment noted. The Council hasn't specified any sources of funding for transport projects, apart from where a scheme is necessary for the Plan.	

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T1 Strategic transport		[We welcome the support expressed in paragraphs 3.252–3.254 for a potential DLR extension to Beckton Riverside and Thamesmead, and future improvements to Stratford station and the intention to protect land and access to ensure delivery of the projects. Mention could also be made of other potential new/ improved stations linked to development proposals. Support for these projects could be made stronger by referencing them in policy T1. The justification text in 3.252 outlines some of the benefits associated with these projects but it could also refer to unlocking and supporting growth. The justification text could also outline the role in which strategic transport provision enables better planning for wider and more local transport such as good interchanges with other public transport (including buses and cycling). This could also refer to TfL's Interchange Best Practice Guidelines.] We note that no changes have been made to the policy to address these points.		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the justification text of Policy T1. The Council's response has not changed.	

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T1 Strategic transport		[The reference to safeguarded land, as well as its potential release where appropriate, is welcomed. This should be consistent with London Plan Policy T3 and London Plan Guidance (LPG) on Sustainable Transport, Walking and Cycling. It would be helpful in the Implementation section to refer to the LPG as it provides guidance on protecting transport infrastructure.] We welcome the addition of a reference to the LPG in T1.1 –Implementation.		Support noted.	



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T1 Strategic transport		<p>[Rather than referring to the London-wide target, the Monitoring section should set a target of 83 per cent mode share for sustainable transport by 2041, consistent with the agreed LIPs target for Newham.]</p> <p>We welcome amended references to the 83 per cent target in the transport introduction and the monitoring section. However it should be noted that this local target for Newham is not set in the Mayor of London's Transport Strategy but has been agreed through the borough's Local Implementation Plan.</p>		<p>Support noted.</p> <p>The Council notes the proposed modification to clarify the 83 per cent mode share target, as agreed through the borough's Local Implementation Plan.</p> <p>The Council recognises the importance of ensuring the Plan is factually accurate and has therefore made the following wording change which is included in the minor modification table.</p>	<p>Target at least 83 per cent of all trips to be made by foot, cycle or public transport.</p> <p>Monitor for progress <b>towards the agreed target set in the Local Implementation Plan, following the Mayor's Transport Strategy.</b> <del>towards the Mayor's Transport Strategy target.</del></p>

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T2 Local transport / T2.1		[In the second paragraph of T2.1 we would like to see additional wording inserted as follows: 'Development should enhance the attractiveness of public transport services. Measures should seek to enhance the reliability, accessibility and ease of interchange of public transport services.'] We welcome the inclusion of additional wording in T2.1 to address this point.		Support noted.	
T2 Local transport		[Rather than referring to the London-wide target, the Monitoring section should set a target of 83 per cent mode share for sustainable transport by 2041, consistent with the agreed LIPs target for Newham] We welcome the amended references to the 83 per cent target throughout the document.		Support noted.	

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T3 Transport behaviour change		We welcome clarification relating to Blue Badge parking.		Support noted.	
T3 Transport behaviour change		We welcome clarification that any car parking for commercial or industrial uses should be within the maximum standards set by the London Plan.		Support noted.	

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T3 Transport behaviour change / T3.1		We welcome clarification of the requirements for mobility scooter parking in part 1.c. and T3.1		Support noted.	
T3 Transport behaviour change / T3.5		We welcome clarification of the requirements for charging E bikes and mobility scooters in part 5. This should be checked for consistency with the latest safety advice from London Fire Brigade.		Support noted.  Implementation text of Policy T3.5 states that "Applicants should liaise with Building Control and the London Fire Brigade to understand the current recommendations and requirements."	

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T3 Transport behaviour change		We note that this approach has not changed but we understand that it is to cater for delivery and servicing vehicles.		Comment noted.	

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T3 Transport behaviour change / T3.1		We reiterate our Regulation 18 response that in T3.1 there should be a reference to the Blue Badge parking requirements in London Plan Policies T6.1 and T6.5.		<p>The Council notes the proposed modification to reference the London Plan policies T6.1 and T6.5 in Policy T3.1.</p> <p>The Council recognises the importance of ensuring the Plan is clear and easy to use and has therefore made the following wording change which is included in the minor modification table.</p>	Developments should provide a quantity of blue badge spaces <b>(in line with London Plan (2021) standards)</b> proportionate to the scale <b>and nature</b> of the development and the quantity of existing blue badge spaces in the local area.

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T3 Transport behaviour change / T3.2		We welcome the amended reference to a Parking Design and Management Plan in T3.3.		Support noted.	

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T3 Transport behaviour change / T3.7		We note that this is already covered by T3.7 although it would be helpful to clarify that the Transport Assessment should include a day and night time Active Travel Zone Assessment at least for applications referred to the Mayor of London.		<p>This wording change is not supported. We did not consider this change to be necessary as T3 already requires Transport Assessment to follow Transport for London format.</p> <p>The Council is satisfied that the plan is sound without the proposed changes.</p>	
T3 Transport behaviour change / T3.2		We strongly welcome the addition of part 2 which states that 'Development that proposes a drive-through will not be supported. Development which results in the loss of existing car parking or excess road space would be supported.		Support noted.	



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T4 Servicing a development / T4.1		<p>We reiterate our Regulation 18 response that the requirement for Construction Logistics Plans and Delivery and Servicing Plans should be made clearer using the standard terminology used in London Plan Policy T7 and providing a link to TfL guidance. The policy should also state a presumption that servicing should take place off street wherever possible to ensure consistency with London Plan Policy T7.</p>	<p>This could be achieved by including the first sentence of T4.1 in the Implementation section as point 1 of Policy T4 'Where possible, servicing and deliveries should take place within the curtilage of the development.' These changes are necessary to ensure soundness and consistency with the London Plan</p>	<p>The Council's objective for this policy approach is to ensure that servicing and deliveries to and from a site can take place safely, without causing highways impacts or endangering vulnerable road users.</p> <p>However, the Council recognises the importance of ensuring the Plan is consistent with the London Plan, and therefore made the following wording change which is included in the minor modification table.</p>	<p>Where possible, servicing and deliveries should take place <b>off street</b>, within the curtilage of the development.</p>

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T4 Servicing a development / T4.3		We welcome the recommendation of accreditation schemes in T4.3.		Support noted.	
T5 Airport / T5.4b		We welcome the addition of a reference to active travel in point 4b and the additional bullet point in the Planning Obligations section which states that 'Contributions may be sought from airport developments for improved public transport and active travel access to the airport.'		Support noted.	

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		<p>Red text in a comment refers to maps, diagrams or other documents provided as part of the representation</p> <p>Blue text in a comment is a quote of TfL's Regulation 18 representation</p>			
N17 Gallions Reach		[We suggest that Beckton Riverside is included in the title for clarity.] We note that no change has been made in response to this point		.A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council's response has not changed.	
N17 Gallions Reach		[We support the provision of a riverside pier which would enable river bus services to be extended to the area. The pier and initial operating costs will need to be fully funded through contributions from developments and conform to TfL standards and guidance. Land and rights for access by passengers and for construction and operational purposes must also be provided.] We note that no change has been made in response to this point		<p>A change to this policy approach has not been made.</p> <p>We did not consider this change to be necessary as the Sustainable Transport Strategy found that riverside piers weren't necessary to enable development and as such were not prioritised for investment where resources are limited.</p> <p>The council is satisfied that the plan remains sound without the proposed changes.</p>	

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N17 Gallions Reach	N17.SA1 Beckton Riverside	[Any large redevelopment at Gallions Reach, with or without a DLR extension to Thamesmead, would likely result in Gallions Reach station requiring a secondary means of egress (and associated platform extensions). The north ends of the platforms are currently non-compliant. While this derogation is acceptable on the basis that trains usually do not arrive particularly full (because it is one stop before the end of the line), it may not remain so if demand increases. This may need to be addressed as part of the potential Thamesmead extension or as a consequence of proposals being brought forward for Gallions Reach. However, it will require further study and developer contributions will be required to fund and facilitate any works. Regardless of any safety issues, a development of sufficient size would likely lead us to request contributions towards platform extensions to spread out passengers, minimise dwell times and manage peak crowding.] We welcome changes that have been made to N17 and N17.SA1 to reflect this point		Support noted.	

N17 Gallions Reach		<p>[The second and third sentences of 4.9 should be amended for clarity: 'The council, Greater London Authority, Transport for London, Homes England, St William, ABRDN, the Thamesmead Waterfront Joint Venture and the London Borough of Greenwich are proposing to extend the DLR through the neighbourhood and deliver a new DLR station at Beckton Riverside. The DLR would continue over the river to another new DRLDLR station at Thamesmead Central in the London Borough of Greenwich.'] We welcome changes that have been made to N17 and N17.SA1 to reflect this point</p>	<p>although we note that references should be to the Royal Borough of Greenwich.</p>	<p>Error is noted.</p> <p>This has been rectified by making the following wording change which is included in the minor modification table.</p>	<p>The neighbourhood has very limited access to public transport, with a moderate level of public transport access to the south west of the neighbourhood near Gallions Reach DLR station. The council, Greater London Authority, Transport for London, Homes England, St William, ABRDN, the Thamesmead Waterfront Joint Venture and the <del>London Borough of Greenwich</del> <b>Royal Borough of Greenwich</b> are proposing to extend the DLR through the neighbourhood and deliver a new DLR station at Beckton Riverside. The DLR would continue over the river to another new DLR station at Thamesmead Central in the <del>London Borough of Greenwich</del> <b>Royal Borough of Greenwich</b>.</p>
N17 Gallions Reach		<p>[We recommend that a potential bus, walking and cycling crossing of the Roding between Beckton and the River Road area in Barking &amp; Dagenham is included. This was identified in the London Riverside Development Infrastructure Funding Study, is included in Figure 8 (page 37) of LBBD's Local Plan (submission version) and in Table 6 and Figure 34 (both page 31) of the "Borough Wide Transport</p>	<p>We recommend that this project is included in N17 and on the proposals map for consistency.</p>	<p>A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council's response has not changed.</p>	

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		Policies: 2021-2037" in its transport evidence base. This should also be marked on your proposals map] We note that no change has been made in response to this point despite the Lower Roding crossing being included in the Newham Infrastructure Delivery Plan.			
N17 Gallions Reach		[Although there are no current proposals, we encourage you to identify and protect the path of a future potential DLR or rail extension from Gallions Reach/Beckton Riverside northwards to Barking (along the corridor of the River Roding/North Circular) if any plans for this link were revived. This (may) also affect the eastern edge of Beckton, East Ham South and East Ham neighbourhoods.] We note that no change has been made in response to this point.		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council's response has not changed.	

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N17 Gallions Reach	N17.SA1 Beckton Riverside	[See comments regarding DLR in N1 which would apply to this site.] We welcome changes that have been made to N17 and N17.SA1 to reflect this point.		Support noted.	
N17 Gallions Reach	N17.SA1 Beckton Riverside	[There is no reference to the circumstances in which safeguarded land would be released, or the principle of its release. We welcome some clarity in the local plan on this.] We welcome clarification regarding the release of safeguarded land.		Support noted.	

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N17 Gallions Reach	N17.SA1 Beckton Riverside	[The second paragraph of the Development Principles section states that 'The development of this site should occur only once the outcome of the Beckton to Thamesmead DLR extension project is known and must reflect the agreed outcome.' We support this statement in that it seeks to ensure development is linked to new infrastructure provision required to unlock the site and will require developer contributions as part of a wider funding package to support a new DLR station. However, TfL would also support flexibility in the way this is phrased to allow for discussions on limited deadweight development that could take place before a DLR extension was confirmed, as well as the potential sequencing of DLR approval processes and planning applications.] We note and support the updated wording which provides flexibility and greater certainty on phasing of development.		Support noted.	



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N17 Gallions Reach	N17.SA1 Beckton Riverside	[The development principles should include a masterplan approach between land owners, the GLA, boroughs and TfL. It is also unclear if the major centre listed is the same as the district centre referred to elsewhere in the local plan.] We welcome clarification of the status of the district centre		Support noted.	
N17 Gallions Reach	N17.SA1 Beckton Riverside	[The infrastructure requirements should require a joint stakeholder approach between landowners, infrastructure providers and authorities.] We welcome amended wording in the infrastructure requirements.		Support noted.	

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N1 North Woolwich		[We support the provision of a riverside pier which would enable river bus services to be extended to the area. This pier and pump primed operating costs will need to be fully funded through contributions from developments and conform to TfL standards and guidance. Land and rights for access by passengers and for construction and operational purposes must also be provided. For clarity, any riverside pier must be separate from, and not impact, Woolwich Ferry operations nor associated vehicle access and holding areas. We also support the principle of Low Traffic Neighbourhoods and the provision of new bridges for walking and cycling to mitigate the severance caused by train tracks subject to funding being secured.] We note that no change has been made in response to this point.		A change to this policy approach has not been made.  We did not consider this change to be necessary as the Sustainable Transport Strategy found that riverside piers weren't necessary to enable development and as such were not prioritised for investment where resources are limited.  The council is satisfied that the plan remains sound without the proposed changes.	

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N1 North Woolwich		<p>[There is existing bus stand and stop space on Pier Road by the ferry terminal within the N2.SA1 footprint that needs to be retained. and its operations safeguarded. including through application of the agent of change principle. TfL is currently discussing with the developer of the site to the north options for this space. but the principle remains that the capacity for operations must be retained in the vicinity and any changes cannot be funded by TfL] We note that no change has been made to the infrastructure requirements although Policy T1 now explicitly mentions bus stands and the bus stand is included as an existing use on site N1.SA1</p>	<p>Given that there are discussions about the future use of the bus stand and stop space we believe that retention of bus standing should be stated as an explicit infrastructure requirement for site N1.SA1 to ensure soundness</p>	<p>The Council notes that Local Plan Policy T1 makes specific reference to bus stands, however the bus stands at N1.SA1 are within the red line boundary of the site.</p> <p>The Council recognises the importance of ensuring the Plan is clear and effective and therefore proposes to support the following main modification:</p>	<p>Development should address open space deficiencies by providing a pocket park. The open space provision should prioritise community growing opportunities. In addition to the open space provision, development should provide publicly accessible play space in form of a Local Equipped Area for Play and Local Area for Play. These should be playable public realm.</p> <p><b>Provision of bus stops and bus stands (including drivers' facilities) on Pier Road must be maintained.</b></p>

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	N1 North Woolwich	<p>[See comment under N2 above regarding the need to retain bus stand space on Pier Road by the ferry terminal.] We note that no change has been made to the infrastructure requirements although Policy T1 now explicitly mentions bus stands and the bus stand is included as an existing use on site N1.SA1</p>	<p>Given that there are discussions about the future use of the bus stand and stop space we believe that retention of bus standing should be stated as an explicit infrastructure requirement for site N1.SA1 to ensure soundness.</p>	<p>The Council notes that Local Plan Policy T1 to makes specific reference to bus stands, however the bus stands at N1.SA1 are within the red line boundary of the site.</p> <p>The Council recognises the importance of ensuring the Plan is clear and effective and therefore proposes to support the following main modification:</p>	<p>Development should address open space deficiencies by providing a pocket park. The open space provision should prioritise community growing opportunities. In addition to the open space provision, development should provide publicly accessible play space in form of a Local Equipped Area for Play and Local Area for Play. These should be playable public realm.</p> <p><b>Provision of bus stops and bus stands (including drivers' facilities) on Pier Road must be maintained.</b></p>

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N1 North Woolwich	N1.SA1 North Woolwich Gateway	<p>We attach a plan in <b>appendix B</b> showing Elizabeth line tunnels under site hatched green and areas where TfL have surface ownership shaded green. (The area immediately east of Store Road shaded but not hatched green and within the site is also in shallow tunnel.)</p>	<p>To ensure soundness the following wording should be added as an infrastructure requirement: <b>'The potential constraint of the Elizabeth line assets on design and layout should be taken into account at the pre-application stage through early engagement with Transport for London Infrastructure Protection.'</b></p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan addresses the issues raised in the implementation text T1.1. The council is satisfied that the plan remains sound without the proposed changes.</p>	

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N2 Royal Victoria		[We support the provision of a riverside pier at or near Thames Wharf which would enable river bus services to serve the area. This pier and pump primed operating costs will need to be fully funded through developer contributions and conform to TfL standards and guidance. Land and rights for access by passengers and for construction and operational purposes must also be provided] We note that safeguarding of land for a river pier and river pier facilities has now been added to site allocation N2.SA4 but there is no requirement for development to fund its provision.		A change to this policy approach has not been made.  We did not consider this change to be necessary as the Sustainable Transport Strategy found that riverside piers weren't necessary to enable development and as such were not prioritised for investment where resources are limited.  The council is satisfied that the plan remains sound without the proposed changes.	

N2 Royal Victoria		<p>[We support a new DLR station at Thames Wharf and bridge links to Trinity Buoy Wharf and Leamouth Peninsula crossing. These will need to be fully funded through development contributions or other funding sources because TfL is not able to commit funding at the current time.] We note that there is no requirement for development to fully fund provision of the DLR station or the bridge links although the DLR station is an infrastructure requirement for site and land for the two bridge links is safeguarded.</p>		<p>Comment noted.</p> <p>N2.SA4 Thameside West states that “Development should provide a new DLR station” and “Development should safeguard space for a River Pier Landing Facilities and a River Pier”. The implementation text of Policy T1.1 details that transport projects are set out in the Infrastructure Delivery Plan.</p> <p>The approach taken to all obligations in the Plan is considered sufficiently deliverable. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report.</p>	
N2 Royal Victoria		<p>[The Custom House and Prince Regent DLR Station bus stands sit within the neighbourhood boundary and will need to be retained but are outside any site allocations. The agent of change principle should be applied to any nearby development.] Although no change has been made to the infrastructure</p>		<p>A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to Local Plan Policy T1 to make specific reference to bus stands. The Council’s response has not changed</p>	

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		requirements we note that Policy T1 now explicitly mentions bus stands.			
N2 Royal Victoria	N2.SA1 Silvertown Quays	<p>[Under 'Infrastructure requirements', the need for significant funding for transport improvements is needed to mitigate the impacts of trip generation. The 2016 permission (14/01605/OUT) included developer funding for a Pontoon Dock station upgrade, cycle hire docking stations and public transport capacity improvements. With an increased quantum of development and changes now proposed, the contributions should be increased to reflect this, subsequent cost increases and changes in standards/context since 2016. Grampian conditions or obligations must be applied as before, with significant funding sought for the station in particular]</p>	<p>We welcome inclusion of the following in the Infrastructure Requirements with the minor correction as shown:</p> <p><b>'Development should contribute to active and public transport upgrades, including upgrades at Pontoon Dock Station, including upgrading escalators to improve access.'</b></p>	<p>Support noted.</p> <p>The Council notes the proposed modification to clarify that escalators are not currently present at the station.</p> <p>This is not considered necessary for soundness.</p> <p>However, the Council recognises the importance of ensuring the Plan is factually accurate, and therefore made the following wording change which is included in the minor modification table.</p>	<p>Development should contribute to active and public transport upgrades, including upgrades at Pontoon Dock Station, including upgrading escalators to improve access.</p>



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N2 Royal Victoria	N2.SA1 Silvertown Quays	[The scheme should contribute to green infrastructure as set out in the Public Realm Framework and draft Royal Docks and Beckton Riverside Opportunity Area Planning Framework. Streets should play a role in enhancing the green estate in the area, including the delivery of sustainable urban drainage systems that also enhance the public realm.] We welcome the new wording in the design principles of N2.SA1 which has updated the green infrastructure requirements.		Support noted.	

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N2 Royal Victoria	N2.SA2 Lyle Park West	[Developer funding for active and sustainable transport improvements will be required. Grampian conditions or obligations should be applied to enable delivery and mitigation of development impact in line with London Plan policy. Assessment of the capacity of West Silvertown station will be necessary, and a contribution secured from developers to mitigate impacts. Permeability for people walking and cycling will be expected to/from the riverside and throughout the area.] We welcome inclusion of the following in the Infrastructure Requirements: 'Development should contribute to active and public transport upgrades as well as an assessment of the capacity of West Silvertown Station and potential mitigation measures.		Support noted.	

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N2 Royal Victoria	N2.SA2 Lyle Park West		<p>The northern boundary of the site includes land and airspace occupied by DLR West Silvertown Station and viaducts. To ensure soundness the following wording should be added as an infrastructure requirement: <b>'The potential constraint of the DLR station and structures on design and layout should be taken into account at the pre-application stage through early engagement with Transport for London Infrastructure Protection.'</b></p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan addresses the issues raised in the implementation text T1.1. The council is satisfied that the plan remains sound without the proposed changes.</p>	

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N2 Royal Victoria	N2.SA3 Connaught Riverside	[As with Silvertown Quays, developer funding for a Pontoon Dock station upgrade and other active and sustainable transport improvements are required. Grampian conditions or obligations should be applied to enable delivery and mitigation of development impact in line with London Plan policy. Permeability for people walking and cycling will be expected to/from the riverside and throughout the area] We welcome inclusion of the following in the Infrastructure Requirements: 'Development should provide an upgrade of Pontoon Dock Station, including escalators to improve access to the station.'		Support noted.	

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N2 Royal Victoria	N2.SA3 Connaught Riverside		<p>The DLR viaduct passes diagonally across the north end of the site.</p> <p>To ensure soundness the following wording should be added as an infrastructure requirement: <b>'The potential constraint of the DLR structures on design and layout should be taken into account at the pre-application stage through early engagement with Transport for London Infrastructure Protection.'</b></p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan addresses the issues raised in the implementation text T1.1. The council is satisfied that the plan remains sound without the proposed changes.</p>	

N2 Royal Victoria	N2.SA4 Thameside West	<p>[We support the principles outlined and, in respect of the 2020 permission (18/03557/OUT), consider the site-specific opportunities available to promote sustainable transport modes have been taken up. We also agree that safe and suitable access to site will be achieved for all users, and significant capacity and safety impacts from development will be mitigated to an acceptable degree. However, delivery funding, especially of the new station, remains an issue.] We note that no changes have been made in response to this point</p>		<p>A change to this policy approach has not been made.</p> <p>We did not consider this change to be necessary as the Plan is already considered sufficiently flexible to enable to delivery of infrastructure, with the implementation text of policy BFN4.3 already allowing for site level flexibility when the provision of infrastructure is required by the site allocation and/or an infrastructure provider.</p> <p>This prioritisation approach is also in Newham's adopted Local Plan (2018) and Newham do not consider there to be any examples where required transport infrastructure has not been delivered as a result of the existing policy.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>	
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N2 Royal Victoria	N2.SA4 Thameside West		<p>We attach plans in <b>appendix B</b> showing approximate locations of LU Jubilee line tunnels under site as red dashed lines, DLR surface lines shaded purple, Cable car air space above site hatched purple and land acquired for Silvertown Tunnel surface works and tunnels shaded green. To ensure soundness the following wording should be added as an infrastructure requirement: <b>‘The potential constraint of the London Underground and Silvertown Tunnel assets below ground, the DLR and Silvertown Tunnel assets at ground level and the Cable Car airspace on design and layout should be taken into account at the pre-application stage through early engagement with Transport for London Infrastructure Protection.’</b></p>	<p>Comment noted. This comment has been subject to further discussion with Transport for London and a satisfactory resolution has been found. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report.</p> <p>However, the Council recognises the importance of ensuring the Plan is consistent and has therefore made the following wording change which is included in the minor modification table.</p>	<p>i. Radar stations and sightline  ii. Rail (including National Rail, Elizabeth line, Tube, DLR) lines, stations and depots  iii. Buses – priority measures, stands (including drivers’ facilities), stations and depots/<b>garages</b>  iv. Protected mooring points, public river access points and piers  v. Bridges <b>and tunnels</b>  vi. Safeguarded wharves and their access requirements  vii. Rail heads and their access requirements  viii. London City Airport (including the Public Safety Zone and Aerodrome Safeguarding requirements)  <b>ix. London Cable Car</b></p>
N3 Royal Albert		<p>We welcome the following in the Infrastructure Requirements for site N3.SA1: ‘Development proposals will need to provide an assessment of the capacity of Beckton Park DLR Station and provide</p>		<p>Support noted.</p>	



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		mitigation to manage any adverse impact identified to the operation of the station as a result of development of the site allocation.' 'Development should deliver platform lengthening and secondary means of escape at Royal Albert DLR Station.'			
N3 Royal Albert North	N3.SA1 Royal Albert North	We welcome the following in the Infrastructure Requirements: 'Development proposals will need to provide an assessment of the capacity of Beckton Park DLR Station and provide mitigation to manage any adverse impact identified to the operation of the station as a result of development of the site allocation' 'Development should deliver platform lengthening and secondary means of escape at Royal Albert DLR Station.'		Support noted.	

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N3 Royal Albert North	N3.SA1 Royal Albert North		We attach a plan in <b>appendix B</b> showing that at the west end of the site DLR tracks are within the site and Elizabeth line tunnels pass under the site (red hatched). To ensure soundness the following wording should be added as an infrastructure requirement: <b>‘The potential constraint of the DLR and Elizabeth line structures (including the Connaught Tunnel) on design and layout should be taken into account at the pre-application stage through early engagement with Transport for London Infrastructure Protection.’</b>	A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan addresses the issues raised in the implementation text T1.1. The council is satisfied that the plan remains sound without the proposed changes.	

N4 Canning Town		We note that there is no requirement for development funding towards Canning Town station improvements. This is however in the Newham Infrastructure Delivery Plan for developer contributions to provide and so we recommend that this requirement is included in N4 for consistency.		<p>A change to this policy approach has not been made.</p> <p>Canning Town Neighbourhood Vision supports “improvements to increase the capacity of Canning Town Station”. The implementation text of Policy T1.1 details that transport projects are set out in the Infrastructure Delivery Plan.</p> <p>The approach taken to all obligations in the Plan is considered sufficiently deliverable. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report.</p>	
N4 Canning Town		[Developments in this area, including the Limmo site, must consider the requirements for a potential DLR extension to Thamesmead, including a potential turnback on the peninsula.] We note that no change has been made in response to this point.		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council’s response has not changed.	
N4 Canning		We welcome the following in the Infrastructure Requirements for site N4.SA4: ‘The site contains an active bus station. If other uses are proposed to co-		Support noted.	

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		locate on the bus station site there will need to be careful consideration of how the site is developed so as to not interrupt the operational capacity of the station. Existing capacity at Canning Town Bus Station must be safeguarded.'			
N4 Canning Town		[Bus infrastructure in the neighbourhood must be retained. and the agent of change principle applied to sensitive development. Canning Town bus station is within the footprint of N5.SA5. Manor Road bus stand is within the Neighbourhood boundary, north of site N5.SA4 and east of N5.SA5. Peto Street Rail Replacement bus stands are east of N5.SA4. Hermit Road bus stands are north of the N5.SA1 site.] Although no change has been made to any of the site infrastructure requirements regarding bus standing we note that Policy T1 now explicitly mentions bus stands		Comment noted.	

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N4 Canning Town	N4.SA4 Limmo	We welcome the following in the Infrastructure Requirements for site N4.SA4: 'The site contains an active bus station. If other uses are proposed to co-locate on the bus station site there will need to be careful consideration of how the site is developed so as to not interrupt the operational capacity of the station. Existing capacity at Canning Town Bus Station must be safeguarded.'		Support noted.	
N4 Canning Town	N4.SA4 Limmo	[In 'Infrastructure requirements' it is not clear where in Canning Town the proposed new bridge would connect to. The wording should be clarified to refer to the proposed walk route over the rail tracks as follows: Development should provide a new bridge connection from Canning Town the Limmo site through to Brunel Street Works, providing 24 hour non-fare paying access to the Town Centre.] We welcome the amended wording to address this point		Support noted.	

N4 Canning Town	N4.SA5 Canning Town Riverside	<p>[Canning Town bus station must be retained and improved to support development in this area. We understand that the Council are progressing a public realm and active travel improvement scheme for Bidder and Stephenson Streets area. Hence mitigation measures/contributions to help deliver this will be expected. Any proposals must maintain bus access in this area alongside improvements to infrastructure and/or services where necessary. The river, A13 and the railway all cause severance and developments should contribute towards reducing these barriers, including through improving the A13 underpass, the routes either side of the A13 and the crossing beneath the viaduct at the roundabout. Until and unless an alternative alignment for the proposals for the Mayer Parry walk and cycle bridge over the Lea are agreed, the site should safeguard a landing point and provide for a continuous riverside walk and cycleway.] We welcome amended wording in the design principles and infrastructure requirements for site N4.SA5 to address these points. We welcome inclusion of the requirement to safeguard land for a new bridge connection and the accompanying map showing the location for the bridge landing point. It would be beneficial to also include a key route through the centre of the site from Bidder Street to the River Lea as shown in the Crown Wharf planning application to form a connection to the bridge, and a key route through the Local Mixed Use Area. This is to ensure there are sufficient links through the site from the river walk for safety and connectivity reasons.</p>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the Site Allocation map has been positively prepared to illustrate the design principles for the site, this will ensure that there are sufficient links through the site. The Council is satisfied that the plan remains sound without the proposed changes.</p>	
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N4 Canning Town	N4.SA5 Canning Town Riverside		<p>The southern boundary of this site includes land occupied by DLR tracks and the south-eastern corner appears to include airspace above both Jubilee line and DLR tracks. To ensure soundness the following wording should be added as an infrastructure requirement: <b>'The potential constraint of the LU and DLR tracks and operations on design and layout should be taken into account at the pre-application stage through early engagement with Transport for London Infrastructure Protection.'</b></p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan addresses the issues raised in the implementation text T1.1. The council is satisfied that the plan remains sound without the proposed changes.</p>	

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N5 Custom House	N4.SA5 Canning Town Riverside	We welcome the following in the Infrastructure Requirements for site N5.SA1: 'Development should re-provide bus-standing and drivers' facilities on the south-western part of the site.'		Support noted.	
N6 Manor Road		[West Ham station may require interventions to address crowding and increase capacity because platforms are currently accessed by a single stairway. This should be added as an infrastructure requirement for N7 sites. Station improvements will need to be funded through development contributions or other funding sources because TfL is not currently able to commit funding.] We note that this point is addressed in the infrastructure requirements for sites in Three Mills (N7).		Comment noted.	



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N7 Three Mills		[Comments on West Ham station in N6 also apply to this area. The primary vehicle route which connects to Manor Road and is shown on the plan as a dotted line has, in the past been, been questioned by DLR colleagues due to concerns about the quality of bridge structures.] We note that this point is addressed in the infrastructure requirements for sites in Three Mills (N7)		Comment noted.	
N7 Three Mills	N7.SA1 Abbey Mills	We welcome the inclusion of the following in the infrastructure requirements for site N7.SA1: 'Development should provide an improved bridge connection to West Ham Station.' 'Development should contribute to active and public transport upgrades, including access to and capacity at West Ham and/or Abbey Road Stations.'		Support noted.	

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N7 Three Mills	N7.SA1 Abbey Mills		<p>To ensure that potential future options for increased capacity at West Ham station can be accommodated an additional requirement should be added as follows: <b>'A small area of land to the north west of West Ham station should be reserved to enable additional station capacity to be provided in the future.'</b></p> <p>Expansion to the north west is the only option to help enable additional station capacity as the station is restricted by development on all other sides of the station.</p>	<p>The Council supports improvement in access and capacity at West Ham station, as set out in the Sustainable Transport Strategy.</p> <p>At present, there is not sufficient published evidence on what improvements would be required at West Ham, and the land required for any improvements.</p> <p>However, the Council recognises the importance of ensuring that the Plan is effective, and therefore proposes the following main modification:</p>	<p>Development should contribute to active and public transport upgrades, including access to and capacity at West Ham and/or Abbey Road Stations.</p> <p><b>The applicant should engage with TfL at the point of application to see if land is required to enable station upgrades at West Ham station.</b></p>

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N7 Three Mills	N7.SA2 Parcelforce	We welcome the inclusion of the following in the infrastructure requirements for site N7.SA2: 'Development should provide a new bridge connection to the entrance of West Ham Station and two footbridges across Manor Road.'		Support noted.	
N7 Three Mills	N7.SA2 Parcelforce		We also welcome the following infrastructure requirement although for soundness we recommend the alteration shown in red [shown in bold] 'Development should contribute to active and public transport upgrades, including <b>access for bus services, bus standing space as well as</b> access to, and capacity at, West Ham Station.'	<p>This wording change is not supported. We did not consider this change to be necessary as Local Plan Policy T1 makes specific reference to protect bus stands.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>	

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N7 Three Mills	N7.SA2 Parcellforce	We welcome the inclusion of the following in the design principles: 'Routes through and to and from the site should improve access and connectivity to West Ham Station, N7.SA1 Abbey Mills, the Twelvetrees Local Centre and the Manor Road neighbourhood.'		Support noted.	
N7 Three Mills	N7.SA3 Sugar House Island	We welcome inclusion of the following in the design principles for site N7.SA3: 'Routes through and to and from the site should improve access and connectivity across the waterways and provide a new bus route through the site. Development should improve walking and cycling conditions on the Stratford High Street...'		Support noted.	

N8 Stratford and Maryland		<p>We note that although site N8.SA2 Infrastructure Requirements include: 'Increased station and interchange capacity through improved circulation, new ticket hall and new station entrances' there is no mention of development funding.</p>		<p>A change to this policy approach has not been made.</p> <p>We did not consider this change to be necessary as we consider that policy T1 and the planning obligations text which supports policy T1, read alongside BFN4 are considered sufficient hooks for the infrastructure requirements set out in the allocation.</p> <p>This is the approach taken to all obligations in the Plan and is considered sufficiently deliverable. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report.</p> <p>The Council is satisfied that the plan remains sound without this change.</p>	
N8 Stratfor		<p>['Britain's busiest station' should be revised to 'one of Britain's busiest stations' as this was a Covid impact and the 2021/22 figures are</p>		<p>Comment noted.</p>	

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		different] We note that this has been corrected in the N8 Neighbourhood Profile.			
N8 Stratford and Maryland		We welcome inclusion of the following in site N8.SA2 infrastructure requirements: 'Land should be safeguarded for double tracking the DLR route.'		Support noted.	
N8 Stratford and Maryland		We note that the design principles for site N8.SA2 already includes the following: 'Any redevelopment of Stratford bus station should retain the function of a consolidated bus station and meet TfL's future requirements'. We welcome the following in the infrastructure requirements for site N8.SA5: 'Retention of bus stations and interchange functions.'		Comment noted.	

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N8 Stratford and Maryland		[In the second paragraph of the vision the first sentence should be amended to read The distinct areas of the neighbourhood will be brought together into a place with strong sense of place and character and through safe, accessible and easy to navigate public transport, walking or cycling routes.] We welcome the addition of this wording.		Support noted.	
N8 Stratford and Maryland		[Point 11 should be amended to read 'increasing the capacity of Stratford station and preventing development which would inhibit future station and interchange improvements'] We welcome the addition of this wording.		Support noted.	

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N8 Stratford and Maryland		[Point 14 imposes a requirement for new and improved connections across the River Lea at Bow Goods Yard. Further explanation would be helpful; a new vehicular connection is required to reduce the traffic impact of any development on the N8.SA8 and SA9 sites. However, we note that Bow Goods Yard is not identified as a Site Allocation, despite the LLDC's designation of this site. While both the continued function of the strategic rail freight facility and capacity of the Strategic Industrial Land should be safeguarded, improvements to and intensification of these functions could release land for development. Within this context, there is a need to co-ordinate both development and the new vehicular link with the Bow Goods Yard West site in Tower Hamlets.] We note that no changes have been made in response to this point.		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council's response has not changed.	
N8 Stratford and Maryland	N8.SA2 Stratford Station	[In 'Development principles' (the last sentence of the first paragraph) the text should be amended to read 'Any redevelopment of Stratford bus station should retain the function of a consolidated bus station and meet TfL's future requirements.'] We welcome the addition of this wording.		Support noted.	



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N8 Stratford and Maryland	N8.SA2 Stratford Station	[In 'Design principles' (fifth paragraph), the text should be amended to read 'The design and layout of the redevelopment of Stratford bus station should locate bus stops in the open but consolidated in a single off-highway location to facilitate easy and efficient interchange away from the over station development. Bus stands can be located under over-station development, but access to daylight is essential in the facilities for TfL staff and bus drivers.'] We welcome the alteration of this wording as suggested although we note that the point about access to daylight is considered too detailed to include.		Comment noted.	
N8 Stratford and Maryland	N8.SA2 Stratford Station	[In the penultimate paragraph of 'Design principles,' the text should be amended to read 'The design and layout of the site should mitigate the impact of noise from the railway transport operational uses.'] We note that this has been amended to read 'The design and layout of the site should mitigate the impact of noise from the railway and transport operational uses.'		Comment noted.	

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N8 Stratford and Maryland	N8.SA2 Stratford Station	[In 'Infrastructure requirements', the following amendment should be made: 'Increased station and interchange capacity through improved circulation, ticket hall and station entrances.'] We welcome the change in wording.		Support noted.	
N8 Stratford and Maryland	N8.SA2 Stratford Station	[In 'Phasing and implementation' the following amendment should be made: 'No development can take place on the Network Rail maintenance depot, London Underground operational areas or bus infrastructure including bus stations until their function is re-provided or re-located in line with stakeholders' requirements.'] We welcome the change in wording.		Support noted.	

N8 Stratford and Maryland	N8.SA2 Stratford Station	<p>The site allocation should consider the need for a flexible approach to facilitate the delivery of new development and a high quality public realm, in line with the local masterplan.</p> <p>Such an amendment would be reflective of the support contained within the London Plan for intensified development at areas of high public transport connectivity. The current approach risks focussing too heavily on delivery of specific elements such as green space.</p>	<p>We suggest broadening the designation to reflect the potential to deliver a wider range of public realm improvements, once more is known about site constraints.</p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the site allocations are considered to be positively prepared, justified and effective.</p> <p>The site allocation has been formulated by collaboration with the Council, LLDC and TfL as well as by the methodology set out in the Site allocation and Housing Trajectory Methodology Note which forms part of our evidence base, whereby on-site public realm, communal amenity space and play space meet the requirements of London Plan Policies D4, D8 and S4.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>	
N8 Stratford and Maryland	N8.SA2 Stratford Station	<p>The proposed bridge and the green space and realm above the Jubilee line and also DLR Woolwich Branch line (platforms 13 to 17) may have significant design and construction challenges, with implications for station operating costs and future maintenance of rail infrastructure. The feasibility of any such proposals will need to be explored early in consultation with appropriate stakeholders from TfL and other organisations.</p>		<p>Comment noted.</p>	

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N8 Stratford and Maryland	N8.SA2 Stratford Station		<p>The entirety of the site within the red line boundary should be considered as having multiple visible and buried rail infrastructure assets. To ensure soundness the following wording should be added as an infrastructure requirement: <b>'The potential constraint of visible and buried rail infrastructure should be taken into account at the pre-application stage through early engagement with Transport for London Infrastructure Protection and Network Rail</b></p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan addresses the issues raised in the implementation text T1.1. The council is satisfied that the plan remains sound without the proposed changes.</p>	

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N8 Stratford and Maryland	N8.SA3 Greater Carpenters District	[It should be clarified that the proposal for Jupp Road Bridge is for a walk bridge rather than a 'primary vehicular route'.] We note that key routes and connections are now shown differently on the site allocation maps		Comment noted.	
N8 Stratford and Maryland	N8.SA3 Greater Carpenters District	[In 'Infrastructure requirements' the following should be added: 'Safeguard land for double tracking DLR route.'] We welcome the addition to the infrastructure requirements		Support noted.	

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N8 Stratford and Maryland	N8.SA5 Stratford Town Centre West	[The list of existing uses should be amended to read 'Stratford International station, Westfield shopping centre, Stratford City bus station, Stratford International bus station, coach and taxi provision, vacant land, office, retail and leisure uses.'] We welcome the amended description of existing uses.		Support noted.	
N8 Stratford and Maryland	N8.SA5 Stratford Town Centre West	[In 'Infrastructure requirements' the following should be added: 'Retention of bus stations and interchange functions.'] We welcome the addition of this wording		Support noted.	

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N8 Stratford and Maryland	N8.SA5 Stratford Town Centre West		<p>We attach plans in <b>appendix B</b> showing locations of LU and DLR lines under and adjacent to boundaries of site, including LU pumping station at A within site and with right of access across site. To ensure soundness the following wording should be added as an infrastructure requirement:</p> <p><b>‘The potential constraint of the London Underground and DLR assets below and above ground including the LU pump shaft and vehicular access thereto should be taken into account at the pre-application stage through early engagement with Transport for London Infrastructure Protection.’</b></p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan addresses the issues raised in the implementation text T1.1. The council is satisfied that the plan remains sound without the proposed changes.</p>	

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N8 Stratford and Maryland	N8.SA9 Pudding Mill	<p>[The map should include a dotted line for Marshgate Lane bus/walk/cycle connection (it is included in LLDC's Area Action Plan and in 'Infrastructure requirements').] We note that key routes and connections are now shown differently on the site allocations maps</p>		Comment noted.	



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N8 Stratford and Maryland	N8.SA9 Pudding Mill		<p>The northern boundary of this site includes land occupied by DLR tracks and an Elizabeth line substation.</p> <p>To ensure soundness the following wording should be added as an infrastructure requirement: <b>'The potential constraint of the DLR and Elizabeth line assets and operations on design and layout should be taken into account at the pre-application stage through early engagement with Transport for London Infrastructure Protection.'</b></p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan addresses the issues raised in the implementation text T1.1. The council is satisfied that the plan remains sound without the proposed changes.</p>	

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N8 Stratford and Maryland	N8.SA10 Chobham Farm North		<p>We attach a plan in <b>appendix B</b> showing the approximate location of Central line tunnels in immediate vicinity of and potentially partially under site as red dotted line.</p> <p>To ensure soundness the following wording should be added</p> <p>as an infrastructure requirement: <b>'The potential constraint of the Central line tunnel on design and layout should be taken into account at the pre-application stage through early engagement with Transport for London Infrastructure Protection.'</b></p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan addresses the issues raised in the implementation text T1.1. The council is satisfied that the plan remains sound without the proposed changes.</p>	

N9 West Ham	N9.SA1 Plaistow North	<p>We note that provision of step free access has now been removed from the list of infrastructure requirements for site N9.SA1 although it is still included in the N9 neighbourhood policy. It is unclear how step free access could be delivered because N9.SA1 is the only site allocation and development funding would be required to deliver step free access.</p>		<p>A change to this policy approach has not been made.</p> <p>We are not prioritising step-free access over other infrastructure requirements, as set out in Policy BFN4.</p> <p>BFN4 sits alongside policy T1 and the planning obligations text which supports policy T1, which are considered sufficient hooks for the infrastructure requirements set out in the neighbourhood policy.</p> <p>This is the approach taken to all obligations in the Plan and is considered sufficiently deliverable.</p> <p>This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report. The Council is satisfied that the plan remains sound without this change.</p>	
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N9 West Ham	N9.SA1 Plaistow North		<p>London Underground have a maintenance access across this site.</p> <p>To ensure soundness the following wording should be added as an infrastructure requirement: <b>'The potential constraint of the LU access route on design and layout should be taken into account at the pre-application stage through early engagement with Transport for London Infrastructure Protection.'</b></p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan addresses the issues raised in the implementation text T1.1. The council is satisfied that the plan remains sound without the proposed changes.</p>	

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N10 Plaistow	N10.SA2 Newham 6th Form College	[Newham General Hospital bus stands east of N10.SA2 will need to be protected.] Although no change has been made to the site infrastructure requirements regarding bus standing we note that Policy T1 now explicitly mentions bus stands.		Comment noted.	
N11 Beckton	N11.SA1 East Beckton Town Centre	[East Beckton bus station to the south-east of N11.SA1 will need to be protected.] We note that no change has been made to the site infrastructure requirements. Although we note that Policy T1 now explicitly mentions bus stands, the reference is to the bus station which needs to be protected and may be considered for expansion to cater for growth in this area.		Comment noted.	

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N11 Beckton		[Although there are no current proposals, we would encourage you to identify and protect the path of a future potential DLR or rail extension from Gallions Reach/Beckton Riverside northwards to Barking (along the corridor of the River Roding/North Circular) if any plans for this link were revived.] We note that no change has been made in response to this point.		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council's response has not changed.	
N11 Beckton	N11.SA2 Cyprus	We welcome inclusion of the following in the site infrastructure requirements: 'Development should assess the capacity of Cyprus DLR Station and provide mitigation on potential impact on transport capacity.'		Support noted.	
N12 East Ham South		[White Horse bus stands on Rancliffe Road junction with High Street South and Newham Town Hall bus stands on Wellington Road will need to be protected.] Although no change has been made to the site infrastructure requirements regarding bus standing we note that Policy T1 now explicitly mentions bus stands.		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to Local Plan Policy T1 to make specific reference to bus stands. The Council's response has not changed.	

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N12 East Ham South		[Although there are no current proposals, we would encourage you to identify and protect the path of a future potential DLR or rail extension from Gallions Reach/Beckton Riverside northwards to Barking (along the corridor of the River Roding/North Circular) if any plans for this link were revived.] We note that no change has been made in response to this point.		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council's response has not changed.	
N13 East Ham	N13.SA2 East Ham Primark	[Ron Leighton Way bus stands on both sides of the highway on west side of N13.SA2 will need to be protected.] Although no change has been made to the site infrastructure requirements regarding bus standing we note that Policy T1 now explicitly mentions bus stands.		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to Local Plan Policy T1 to make specific reference to bus stands. The Council's response has not changed.	

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N13 East Ham		[Although there are no current proposals we would encourage you to identify and protect the path of a future potential DLR or rail extension from Gallions Reach/Beckton Riverside northwards to Barking (along the corridor of the River Roding/North Circular) if any plans for this link were revived.] We note that no change has been made in response to this point.		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council's response has not changed.	



N14 Green Street		<p>[We support the vision of Green Street to include provision of step-free access at Upton Park station. This would need to be wholly funded through developer contributions or other funding sources because TfL is currently not able to commit funding]</p> <p>We note that there is no mention of development funding for step free access.</p>		<p>A change to this policy approach has not been made.</p> <p>We are not prioritising step-free access over other infrastructure requirements, as set out in Policy BFN4.</p> <p>BFN4 sits alongside policy T1 and the planning obligations text which supports policy T1, which are considered sufficient hooks for the infrastructure requirements set out in the neighbourhood policy.</p> <p>This is the approach taken to all obligations in the Plan and is considered sufficiently deliverable.</p> <p>This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report. The Council is satisfied that the plan remains sound without this change.</p>	
N15 Forest Gate		<p>[We welcome support for provision of step-free access at Wanstead Park station, particularly as this offers a short walking route to interchange with the Elizabeth line at Forest Gate.</p>		<p>A change to this policy approach has not been made.</p>	

		<p><a href="#">This would need to be wholly funded through developer contributions or other funding sources because TfL is not currently able to commit funding]</a></p> <p>We note that there is no mention of development funding for step free access</p>		<p>We are not prioritising step-free access over other infrastructure requirements, as set out in Policy BFN4.</p> <p>BFN4 sits alongside policy T1 and the planning obligations text which supports policy T1, which are considered sufficient hooks for the infrastructure requirements set out in the neighbourhood policy.</p> <p>This is the approach taken to all obligations in the Plan and is considered sufficiently deliverable.</p> <p>This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report. The Council is satisfied that the plan remains sound without this change.</p>	
N15 Forest Gate	N15.SA1 Lord Lister Health Centre	<p><a href="#">[Wanstead Park station, Woodford Road bus stands on the east of N15.SA1 will need to be protected.]</a></p> <p>Although no change has been made to the site infrastructure requirements regarding bus standing we note that Policy T1 now explicitly mentions bus stands.</p>		<p>A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to Local Plan Policy T1 to make specific reference to bus stands. The Council's response has not changed.</p>	

N16 Manor Park and Little Ilford		<p>[We welcome support for provision of step free access at Woodgrange Park station. This would need to be wholly funded through developer contributions or other funding sources because TfL is not currently able to commit funding.] We note that there is no mention of development funding for step free access</p>		<p>A change to this policy approach has not been made.</p> <p>We are not prioritising step-free access over other infrastructure requirements, as set out in Policy BFN4.</p> <p>BFN4 sits alongside policy T1 and the planning obligations text which supports policy T1, which are considered sufficient hooks for the infrastructure requirements set out in the neighbourhood policy.</p> <p>This is the approach taken to all obligations in the Plan and is considered sufficiently deliverable.</p> <p>This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report. The Council is satisfied that the plan remains sound without this change.</p>	
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