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From: Anna Stevens <[REDACTED]>
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To: Local Plan
Cc: Michael Clarkson
Subject: Royal Borough of Greenwich Response to LB Newham's Regulation 19 Draft Submission Local Plan
Attachments: RBG Response to LBNewham Local Plan_Reg19 20.09.24.pdf
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Hi

Please find attached Royal Borough of Greenwich's response to the London Borough of Newham's Regulation 19 Draft Submission Local Plan.

Royal Greenwich welcomes the opportunity to comment on London Borough of Newham's Proposed Submission consultation document. The response comments focus on relevant cross boundary issues, housing and duty to cooperate at this stage of plan preparation.

We look forward to further collaborative working with the London Borough of Newham on strategic planning matters. We also look forward to working with the London Borough of Newham to secure a Statement of Common Ground between the London Borough of Newham and Royal Greenwich, in line with national requirements.

Kind regards,

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Introduction

- I.1 The Royal Borough of Greenwich (Royal Greenwich) welcomes the opportunity to comment on London Borough of Newham's Proposed Submission consultation document. This consultation document has been prepared in accordance with Regulation 19 of the Town and Country (Local Planning) (England) Regulations 2012 and in conjunction with the strategic policies and objectives of The London Plan (The Spatial Development Strategy for Greater London, adopted March 2021). To meet the duty to co-operate requirements (as specified in the NPPF, Feb 2019, paragraphs 24 and 25), officer comments will be focused on identified strategic matters that cross administrative boundaries.
- I.2 The below officer comments focus on relevant cross boundary issues, housing and duty to cooperate at this stage of plan preparation. As part of the duty to co-operate, we look forward to continuing working with the London Borough of Newham to ensure that the emerging Local Plan impacts positively on the wider area.

Statement of Common Ground

- I.3 Royal Greenwich has received correspondence from the London Borough of Newham to begin the process of preparing a Statement of Common Ground, in line with national requirements. Royal Greenwich looks forward to collaborating with the London Borough of Newham to prepare and finalise the Statement of Common Ground. Royal Greenwich is at an earlier stage of its Local Plan preparation, having just completed a call for sites process and a first stage Issues and Options consultation in summer 2023.

Section 3: Policies – Building a fairer Newham BFN1: Spatial Strategy and Homes: H1: Meeting Housing Needs

- I.4 The proposed submission for achieving a fairer Newham sets out the spatial strategy for Newham through to 2038. It outlines the London Borough of Newham's 10-year London Plan housing target of 47,600 homes in Newham, one of the largest housing targets in the whole of London. The submission identifies that this target is expected to be achieved between 2019 – 2029. Policy BFN1 (Spatial strategy) outlines that development will be directed to all of Newham's 17 neighbourhoods to distribute the benefits of growth.
- I.5 Policy H1 (Meeting housing needs) details that Newham will enable a net increase of between 51,425 and 53,784 residential units from 2023-2038. The policy directs that this will be achieved through the majority of new units being brought forward by site allocations, as well as optimisation of housing delivery on sites below 0.25 hectares in size and supporting residential developments that come forward on windfall sites. This is supported by a stepped housing trajectory which shows a significant amount of Newham's housing target will be delivered in the medium to long term phase of the plan.
- I.6 Section 4.7 on page 38 of Newham's Site Allocation and Housing Trajectory Methodology Note (July 2024) discusses Newham's shortfall against the London Plan 2021 target. Table 12 shows that Newham is unable to demonstrate a 5-year housing land supply measured against the adopted London Plan housing target, which is worsened when a 20% buffer is applied to the borough's London Plan housing target. Table 10 also demonstrates that Newham does not have sufficient identified housing capacity to meet the Borough's London Plan housing requirement over the course of the London Plan period, with a shortfall of 16,472 units. The shortfall of delivery against Newham's London Plan target stems from delays to the delivery of allocated sites within Newham's adopted Local Plan. Newham intends to address this shortfall over the course of its emerging Local Plan period.

- I.7 Royal Greenwich appreciates the difficulty the London Borough of Newham is facing in not being able to meet its 10-Year London Plan housing target. However, unfortunately, as demonstrated in Royal Greenwich's [Authority Monitoring Report including Five Year Housing Supply Statement](#), when compared to the five-year supply requirement (including the additional 20% buffer) of 22,798 dwellings (4,560 dwellings per annum), it is evident that Royal Greenwich has a housing land supply of 2.46 years. Royal Greenwich will need to assess all mechanisms for increasing its housing supply under its new Local Plan, including through site allocation and other measures. As such, Royal Greenwich does not have the capacity to meet any of the London Borough of Newham's unmet housing needs.

Section 3: Policies – Homes: Policy H10 Gypsy and Traveller accommodation

- I.8 National Planning Policy instructs local authorities to provide housing provision to accommodate a range of different groups including travellers. Policy H10 identifies that the designated Gypsy and Traveller site is safeguarded as a site for Gypsy and Traveller Accommodation, and that developments that propose accommodation for Gypsies, Travellers and Travelling Showpeople, including those for new sites and pitches, will be supported where they meet an identified need. Policy H10 does not list the location of Newham's designated site, however, this is identified on their Draft Newham Local Plan Reg 19 policies (2024) map as Parkway Crescent.
- I.9 In the London Borough of Newham's Duty to Co-operate report in paragraph 4.41, the Council notes that currently the Draft Submission Local Plan allocates one site as a safeguarded Gypsy and Traveller accommodation site (an existing site containing 15 pitches). The Council furthers that the safeguarding of this site does not count towards meeting identified future need, although there is scope to extend the site by a few pitches. In paragraphs 4.47-4.49 of the report, the Council details that given the recent update to the Planning Policy for Traveller Sites, Newham currently have not identified any additional sites in the Draft Submission Local Plan to meet the accommodation needs of the 23 identified in their Gypsy and Traveller Needs Assessment.
- I.10 Paragraph 4.48 of the same report furthers that given the location of the majority of Newham's site allocations are on land susceptible to flood risk, it is unlikely Newham will be able to deliver permanent pitches on identified site allocations in the plan. As such, they seek to meet the need for 23 pitches primarily through Newham Council's Small Sites Options Appraisals and Modular construction programme. In paragraph 4.49 Newham details that they may seek to initiate conversations with neighbouring boroughs if Newham do not identify sufficient sites to meet their need. Royal Greenwich does not have the capacity to provide additional pitches to provide accommodation for gypsy and traveller communities who may reside in Newham.

Beckton Riverside, DLR extension and Thamesmead

- I.11 Paragraph 1.3 identifies that Newham contains three Opportunity Areas: the Olympic Legacy, Poplar Riverside and Royal Docks and Beckton. Paragraph i.13 of the consultation document notes that in May 2023 the Mayor of London published the Royal Docks and Beckton Riverside Opportunity Area Planning Framework (OAPF) as London Plan guidance. BFN1 directs significant levels of growth to the six neighbourhoods in the Royal Docks and Beckton Riverside Opportunity Area, noting that this area has the potential to deliver 36,000 new homes and 55,000 new jobs up to 2041, subject to this growth being unlocked by an extension to the DLR and the delivery of two new DLR stations. The London Plan details the indicative capacity for new homes and jobs within the Royal Docks and Beckton Riverside Opportunity Area as 30,000 and 41,500 respectively.
- I.12 Page 24's key diagram for the London Borough of Newham identifies transport and connectivity improvements which would enhance and connect the Royal Docks and Beckton Riverside Opportunity Area in Newham and Thamesmead in Royal Greenwich. These improvements relate to

the potential DLR extension and additional stations. Page 587 of Newham's consultation documents discusses Newham's Gallions Reach neighbourhood, located in the southeast of the Borough within the Royal Docks and Beckton Riverside Opportunity Area. Paragraph 4.82 notes that the neighbourhood has very limited access to public transport, with the Council and other partners including Royal Greenwich proposing to extend the DLR through the neighbourhood and deliver a new DLR station at Beckton Riverside. The paragraph furthers that the DLR would continue over the river to another new DLR station at Thamesmead Central in Royal Greenwich.

I.13 Royal Greenwich supports these references to the DLR extension within the consultation document and the Duty to Co-operate Document. Royal Greenwich is supportive of the delivery of the DLR extension to Thamesmead and the development potential it is expected to unlock. As identified in the Thamesmead and Abbey Wood Opportunity Area Planning Framework 2020, the DLR extension to Thamesmead is fundamental to enhancing the Thamesmead and Abbey Wood area. The DLR extension would:

- considerably enhance access and transport connections to and from the area, as well as increased connections to other parts of the borough and London, such as Isle of Dogs and Stratford;
- significantly enhance development capacity in the area, where it would enable 15,500 new and affordable homes and 8,000 local jobs in conjunction with new complementary bus transit connections;
- unlock the Thamesmead Waterfront site;
- enable a wholesale revitalisation of Thamesmead Town Centre;
- open opportunities for access and improvements to Thames riverfront;
- increase activity, generating footfall and demand to support local businesses and contribute to the liveliness and safety of the area; and
- increase access to jobs, education and other opportunities across London.

I.14 The area's green setting and proximity to central London is an opportunity for well-designed, accessible homes and family housing, which the DLR extension would enable. A new DLR interchange and bus transit, complemented by improved walking and cycling connections will allow the Thamesmead Town Centre and Waterfront area to better serve the social and convenience needs of its existing and emerging community.

I.15 The DLR extension would considerably improve public transport access for development sites around the Thamesmead Town Centre. It would also enable higher development density around the new DLR station, supporting the viability of a new town centre and new housing. The DLR extension is key to enabling a reinvigorated mixed-used district centre with family-friendly leisure and cultural uses and an attractive evening uses along the waterfront promenade.

I.16 Royal Greenwich looks forward to continuing to work with London Borough of Newham and partners to secure the DLR extension to Beckton Riverside and to Thamesmead.

Employment Land and Strategic Industrial Land:

I.17 In paragraph 4.60 of Newham Draft Submission Local Plan Duty to Cooperate Statement July 2024 the London Borough of Newham identify that they submitted a response on Royal Greenwich's initial phase of consultation on Royal Greenwich's new Local Plan. Paragraph 4.60 details that this response suggested consideration of the agent of change principle on the Royal Greenwich's Strategic Development Locations abutting the River Thames to Newham's Strategic Industrial Locations (SIL) across the river, to ensure existing industries can continue to operate on the SIL.

- I.18 Royal Greenwich appreciates Newham Council's concerns on this matter. It is noted that the same consideration about agent of change considerations for Newham Council's Strategic Development Locations abutting the River Thames to Royal Greenwich's SIL across the river also applies. Royal Greenwich welcomes any future discussion with Newham Council on this matter. Royal Greenwich have commissioned an update to their Employment Land Review and Employment Needs Assessment to inform Draft Local Plan policies.

Silvertown tunnel

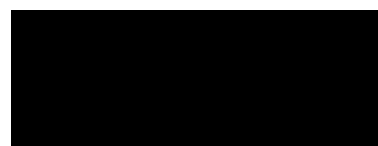
- I.19 Royal Greenwich supports the continued development of the Silvertown Tunnel and co-operation with the London Borough of Newham on any applications relating to the tunnel and designation.

London City Airport


- I.20 Policy T5 focuses on London City Airport, its development and operation and the management of effects. In discussing the policies implementation, the consultation document notes at T5.6 that *'development in proximity to the airport should demonstrate consideration of London City Airport at the time of submission'*. It notes that this *'could include noise, air quality, safety, wider Agent of Change principles, and height limitations (including construction cranes.'* With regards to Agent of Change principles, Royal Greenwich seeks that the same lens is applied to the City Airport with regards to any applications that seek to alter the airport's operation which would have unacceptable impacts upon residents of the Royal Borough of Greenwich, particularly with regards to noise and air quality.
- I.21 Royal Greenwich's position with regards to any proposed changes to the Airport's operations remains the same as that outlined in the raised objection by Royal Greenwich to the most recent Section 73 application by the Airport to the London Borough of Newham.

Conclusion

- I.22 Comments submitted for this consultation focus on matters that are likely to have an impact on the Royal Borough of Greenwich or may prejudice our planning decisions. Comments are not intended to address issues of soundness or legal compliance. Officers consider that the consultation document has been prepared in accordance with Duty to Co-operate procedures in relation to the Royal Borough of Greenwich.
- I.23 We look forward to further collaborative working with the London Borough of Newham on strategic planning matters and have welcomed the opportunity to influence the process of developing policies within the Draft Local Plan to date. We also look forward to working with the London Borough of Newham to secure a Statement of Common Ground between the London Borough of Newham and Royal Greenwich, in line with national requirements.



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