

Sara Chiong

From: Marc Acton Filion <[REDACTED]>
Sent: 20 September 2024 14:26
To: Local Plan
Cc: LocalPlan; [REDACTED]
Subject: LB Tower Hamlets Representation
Attachments: Newham Reg 19 LBTH Representation Letter_FINAL.docx

Follow Up Flag: Follow up
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Hi Newham planning team,

Please see attached Tower Hamlets's representation to Newham's Regulation 19 Local Plan consultation. Please let us know if you have any questions, or want to discuss any matters further.

We would appreciate it if you could confirm receipt.

We will reply to your Statement of Common Ground email separately.

All the best,
Marc on behalf of Plan-making Team

Marc Acton Filion (he/him)
Principal Planning Officer
Plan-Making
Housing and Regeneration
London Borough of Tower Hamlets
Tower Hamlets Town Hall
160 Whitechapel Road
London E1 1BJ

talk.towerhamlets.gov.uk/local-plan

www.towerhamlets.gov.uk

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Housing & Regeneration

Tel 020 7364 5078

www.towerhamlets.gov.uk

London Borough of Newham
Planning Policy Team
Newham Dockside
1000 Dockside Road
London
E16 2QU

25 June 2025

**LBTH Representation on the LB Newham Draft Submission Local Plan
(Regulation 19 Consultation)**

Dear Planning Policy Team,

Thank you for providing LB Tower Hamlets with the opportunity to submit a representation to your Draft Submission Local Plan consultation (Regulation 19 Plan).

Overall, we support the principles and objectives of the Regulation 19 Plan and recognise that our two boroughs share many of the same challenges and opportunities. The primary aim of submitting this representation is to seek further information specifically regarding the proposed release of safeguarded land for waste management at Beckton Riverside. There appears to be a discrepancy between Newham's draft plan (Regulation 19) this aspect would be welcomed.

We wish to have the opportunity to participate in hearing sessions should this be deemed necessary, which we believe is justified given both boroughs continue to cooperate on a number of strategic cross-boundary matters through the Duty to Cooperate. The purpose of this letter is to seek clarification on the aforementioned matter and express support for many of the policies in the Plan.

This letter is set out under the following headings:

1. Background



2. Support for policies
3. Matters requiring clarification
4. Conclusion

1. Background

As you will likely be aware, Tower Hamlets is currently in the process of producing a new Local Plan. This is currently undergoing Regulation 19 consultation, and we are intending to submit our Plan to the Secretary of State early in 2025. As part of our Regulation 19 consultation, we have published a Duty to Cooperate statement, which sets out key strategic matters and how Tower Hamlets has engaged with prescribed bodies and neighbouring local authorities on these matters. This includes the extensive engagement that we have had with LB Newham on numerous strategic cross-boundary issues.

2. Support for policies and site allocations

LB Tower Hamlets wishes to express support for several policies and site allocations.

Policies

- HS1 – We support the redevelopment of Gallions Reach Retail Park as this has been identified in the Tower Hamlets Retail and Town Centre Study as a major leakage of spending out of the borough to out of town retail centres.
- HS5 – It should be noted that Hackney Wick has been designated as a night time economy centre of local significance in the Tower Hamlets Draft Local Plan. There is an opportunity for synergy in the night time economy between Hackney Wick and Stratford.
- J1 – We support the continued designation of Fish Island/Bow Goodsyard as Strategic Industrial Land, the safeguarding of the railhead, and the protection of the site for industrial uses, and we would welcome closer working on plans for redevelopment on the site across both sides of the borough boundary to ensure that both boroughs benefit from enhancements to the public realm and the introduction of sustainable industrial uses. We are aware there is an extant planning application (24/00122/OUT) – which is to be determined by the LLDC given its location - and we would wish that Newham ensure that determination of this application is in conformity with the adopted and emerging Newham policies as well as London Plan policies in relation to protection of SIL. As part of redevelopment here we would expect to see modern and sustainable industry, alongside place-shaping principles which deliver good growth (e.g. public realm improvements, permeability, legibility, quality design, safety etc.) to be implemented across the site regardless of the administrative boundary. This is reflected in our draft local plan and we would hope is reflected as part of any pre/application discussions with applicants.
- H1 – We note that LB Newham is proposing to use a stepped housing trajectory, which in the short term would suggest that their delivery is below

their London Plan target. However, we recognise that this is due to the complex and large scale nature of the sites that they have allocated.

Site Allocations

- N2.SA4 – We support the inclusion of bridge crossings over the River Lea to Tower Hamlets and welcome the opportunity to work further with LB Newham to deliver these crossings.
- N4.SA4 – We support the significant additional greenspace that is proposed on this site and the new crossings of the railway line, which will improve connectivity for residents of Tower Hamlets.
- N4.SA5 – We support the proposed bridge connections across the River Lea to Tower Hamlets, as well as the proposed greenspace along the riverfront and the improved crossings of the A13.
- N7.SA2 – We support additional connectivity through the site and additional greenspace, which will benefit Tower Hamlets residents. We also support the height strategy for the site, which includes lower heights towards Three Mills and the Tower Hamlets boundary.
- N7.SA3 – We support the proposed new bridge across the River Lea to Tower Hamlets and the proposed greenspace along the river.
- N8.SA9 – We support the proposed new bridge across the River Lea to Tower Hamlets.

3. Matters requiring clarification

Policy W1 of Newham's Regulation 19 Plan sets out the borough's strategic approach to waste management, including safeguarding sites for waste management. Point 3 of the policy indicates that 'existing waste sites within Newham will be safeguarded and should be retained in waste management use'. We welcome that safeguarding and note that the safeguarding of all waste sites in Newham is in accordance with the draft East London Joint Waste Plan (ELJWP), which does not identify any sites in Newham for release from waste safeguarding.

However, it is noted that the clear protection in the wording of the policy itself, Implementation Point W1.3 explains that the land at Beckton Riverside that is safeguarded for waste management in the adopted 2012 East London Waste Plan is no longer being safeguarded. This appears to be at odds with both the adopted East London Waste Plan, and the emerging (Regulation 18) ELJWP, neither of which identify Beckton Riverside for release from safeguarding. It is unclear what evidence has been provided to justify such a release.

London Plan Policy SI8 expects boroughs with a surplus of waste sites to offer to share these sites with those boroughs facing a shortfall in capacity before considering site release. Tower Hamlets is facing a shortfall in capacity and

explained this to officers from LB Newham and the other members of the East London Joint Waste Planning Group in meetings in early 2023. We are keen to continue to work with Newham (alongside the other boroughs within the ELJWPG) to ensure that the approaches taken in our respective plans (as well as the East London Joint Waste Plan which is being progressed concurrently) remain in conformity with the adopted London Plan.

As you will be aware, Tower Hamlets provided a detailed representation to the Regulation 18 consultation on the ELJWP (dated 16 September 2024), which sets out in detail the shortfall Tower Hamlets is facing and how much capacity should be allocated from the East London boroughs.

We consider that the release of safeguarded waste sites – as a strategic matter - is best addressed through the ELJWP, particularly as it is currently going through the plan-making process.

4. Conclusion

Overall, we support the principles and objectives of the LB Newham Draft Submission Local Plan. We have noted where further clarification would be welcomed around the proposed release of safeguarded waste sites in Beckton Riverside on the basis that this appears to be in conflict with the emerging East London Joint Waste Plan. We consider that releasing safeguarded waste sites is best addressed through the ELJWP and we welcome further discussion of waste management as part of that process. We look forward to continue conversations with Newham as part of ongoing discussions of strategic matters as part of the Duty to Cooperate.

Tower Hamlets broadly supports the policies in the LB Newham Draft Submission Local Plan, and we have set out in Section 4 where we wish to particularly express support.

We look forward to continuing to work closely with LB Newham on strategic matters as we both move forward in the plan-making process.

All the best,

Plan-making Team
Localplan@towerhamlets.gov.uk