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To: Local Plan
Cc: [REDACTED]
Subject: Newham Draft Submission Local Plan (Reg 19) Consultation - PLA Response
Attachments: PLA response - Newham Regulation 19 consultation.pdf

Follow Up Flag: Follow up
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Good afternoon.

Please find the Port of London Authority comments on the Reg 19 consultation attached for your consideration.

If you have any queries, please don't hesitate to get in touch.

Regards,
Maeliosa

Maeliosa Hardy
Associate Director, Planning Policy
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19th September 2024

Port of London Authority Response to the Newham Regulation 19 Draft Submission Local Plan Consultation

Thank you for consulting the Port of London Authority (PLA) on the Regulation 19 Local Plan consultation for the London Borough of Newham, which sets out how the borough will shape, plan and manage growth, regeneration and development across the borough to 2038. We would like to recognise the response to our comments provided to the Regulation 18 Local Plan consultation as set out in the Consultation Report and incorporated in the latest Reg 19 draft Plan. There are however a few points that we would like to reiterate in addition to some further comments on the latest consultation document as set out below.

The PLA's key interests are on the health and safe use of the river and to enable effective use of the Tidal network alongside any forthcoming development. The Local Plan vision, site allocations and draft policy BFN1 (Spatial Strategy) currently proposes that along the River Lea, new bridges and walkways will create better linkages to natural spaces, stations and neighbouring Tower Hamlets. It must be made clear that any proposed crossing situated over navigable waterways ensures that the public right of navigation is maintained, that safe navigation can continue and that the PLA are involved in the development of such proposals where these cross over areas of the PLA's jurisdiction and / or landownership at an early stage, so that amongst other matters, the height of any proposed bridge can be understood. The need for this early engagement must be highlighted within the Local Plan, potentially in part 6 of policy BFN1 and the associated Infrastructure Delivery Plan (IDP).

Safeguarded Wharves

It is recommended that the Key Diagram on page 21 is updated to specifically include the boroughs safeguarded wharves at Thames Refinery, Peruvian and Royal Primrose wharves to clearly identify the location of these important assets. It is also essential that the Local Plan specifically sets out that these are safeguarded via 2021 Secretary of State Ministerial Direction and supported by policy SI15 (Water Transport) of the Mayors London Plan (2021). Reference to the safeguarding directions isn't made until the supporting text, justification of T1:Strategic

Transport (Page 321). Within the Local Plan it is recommended that this wording is included to support the Key Diagram and included in policy J1 (Employment and Growth) to highlight their safeguarded status.

In our response to the Reg 18 consultation, we noted our support for the Agent of Change Principle; however, we have noted that **Policy D6: Neighbourliness** has not been amended to include a specific reference to the boroughs safeguarded wharves in section 2b of the policy. This is important to ensure the vital need for development proposals located in close proximity to these safeguarded sites are designed to minimise the potential for conflicts of use and preserve the long term viability of wharf operations.

Further to this, as part of the assessment of any required mitigation measures to protect future residents from inappropriate internal noise levels, such as fixed shut windows, the potential for overheating must also be considered in this context so that that an appropriate ventilation/cooling strategy is in place that can if required, enable windows to be kept closed by the occupant for noise mitigation purposes. The highlighting of this link between overheating and the Agent of Change principle must therefore be set out in the supporting text of **Policy CE4: Overheating**.

Detailed Policy Comments (Part 1)

Part 5 of **Policy CE6: Air Quality** includes a requirement that new moorings on waterways must include an electrical hook up at each mooring point. Whilst this is in principle supported further detail is needed in the supporting text on all types of moorings that this would be a requirement for – ie. Residential / Visitor / Commercial.

We welcome the addition of supporting text at paragraph T.4.1 to support **Policy T4: Servicing a Development**, to demonstrate consideration of the use of waterways for ongoing servicing and deliveries for developments located in close proximity to navigable waterways. As noted in our comments on the Reg 18 consultation, we would suggest this is a requirement in the policy itself.

Neighbourhoods (Part 2)

As a general comment for the site allocations involving proposed bridge crossings (as noted earlier), they must be clear that any proposed crossing situated over navigable waterways ensures that the public right of navigation is maintained, that safe navigation can continue and that the PLA are consulted in the development of such proposals where these cross over areas of the PLA's jurisdiction and/or landownership. Engagement should commence at an early stage so that amongst other matters, the height of any proposed bridge can be understood and relevant advice can be provided.

N1: North Woolwich

We acknowledge the inclusion of Thames Refinery Wharf in part 10 of this policy to safeguard its capacity and operation; however, we would also highlight the importance of mitigating noise impacts (as has been set out at part 19 for the airport).

N3: Royal Victoria

We welcome the reference to Thames Refinery wharf which borders this neighbourhood as well as the safeguarded wharves located opposite this neighbourhood in the Royal Borough of Greenwich, at Angerstein, Murphy's and Riverside Wharves. Although we have provided individual comments on the site allocations below, it is important that the supporting maps show the location of the wharves. We welcome the approach to using the 'sensitive edge' as a marker for these safeguarded and sensitive assets but would like to see clarity in labelling the wharves also. As a general comment we also highlight the importance of referring to the Agent of Change principle within the Design Principles of the site allocations.

N2.SA2 Lyle Park West site map (page 381) must specifically highlight the adjacent safeguarded Royal Primrose Wharf. In addition, it is noted that the site map shows a key route adjacent to the safeguarded wharf. It is also important to note that there may be a particular challenge in finding the best route for the Thames Path near operational wharves and terminals, and given that to the west of this allocation there is a dedicated industrial area with the two safeguarded wharves, it may not be appropriate for the Thames Path extension to directly come through this area.

N2.SA3 Connaught Riverside design and layout of the site should take into consideration amenity impacts of, and access to, the Thames Refinery Wharf to ensure development does not compromise its operation.

N4: Canning Town

N2.SA4 Limmo has stated the requirement for a new river wall as part of the necessary infrastructure. There will likely be a requirement for a river works licence with the PLA to carry out such works, and the PLA should be consulted at the appropriate time.

I hope you find these comments helpful as you progress the Local Plan. Should you have any queries, please don't hesitate to contact us.

Yours sincerely

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Maeliosa Hardy

Planning Consultant