

Sara Chiong

From: Planning Policy <[REDACTED]>
Sent: 20 September 2024 15:54
To: Local Plan
Cc: Ellie Kuper Thomas; Planning Policy; [REDACTED]
Subject: Newham Revised Local Plan Regulation 19 Consultation Response
Attachments: 2. Appendix 1 Newham Reg 19 Table 1_Suggested Changes.docx; 2. Appendix 1 Newham Reg 19 Table 1_Suggested Changes.pdf; 3. Appendix 3_Site Allocation SA2 mark.pdf; 4. 240314 London Stadium Island LBN Call for Sites (DRAFT) v0.1 (IM_LR).docx; 5. 240314 London Stadium Island LBN Site Allocation (DRAFT) v0.1 (IM_LR).docx; 6. Stadium Led Development Case Studies.pdf; 0. Response_form__LLDC.docx; 1. 040920 LBN LP Reg 19 response Cover Letter Final signed.docx; 1. 040920 LBN LP Reg 19 response Cover Letter Final signed.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Dear Planning Policy Team,

Please find attached LLDC's response to the Regulation 19 consultation.

Kind regards

Alex Savine (he/him)
Head of Planning Policy & Infrastructure
London Legacy Development Corporation
Level 9. 5 Endeavour Square
Stratford, London. E20 1JN
Mobile: [REDACTED]
Email: [REDACTED]



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Response Form for Regulation 19 Consultation.

	<p>Local Plan Publication Stage Response Form</p>	<p>Ref:</p> <p>(For official use only)</p>
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**Name of the Local Plan to which this representation
relates:**

Newham Draft Submission
Local Plan

Privacy Notice

Who we are

London Borough of Newham (LBN) is registered with the Information Commissioner's Office (ICO) as a 'Data Controller' This privacy notice applies to you ('the service user') and LBN ('the Council'). The Council takes the privacy of your information very seriously.

This privacy notice relates to our functions relating to the Newham Local Plan Review Consultation (Regulation 19). It also provides additional information that specifically relates to this particular consultation, and should be read together with our [general privacy notice](#), which provides further detail.

What data do we collect and process

We collect your name, contact details, email address, job title and organisation if applicable and demographic equalities data if you choose to share it.

Why we collect your data

The consultation is a requirement of the Town and Country Planning (Local Planning) (England) Regulations 2012. We collect your data so that we can get your views on the legal compliance or soundness of the Local Plan, as well as its compliance with the duty to co-operate.

The lawful basis for processing your data

The lawful basis we use to process your data as set out in UK data protection legislation is:

Article 6 (a) Consent: the individual has given clear consent for us to process their personal data for a specific purpose.

Article 9 (a) Explicit Consent: the data subject has given explicit consent to the processing of those personal data for one or more specified purposes.

We will only process personal data where we have consent to do so, and you can withdraw your consent at any time. By submitting your personal data in the response form you are consenting for us to process your data and/or consenting to be added to the database. If added to the database, they can be removed upon request.

You can withdraw your consent at any time.

How we use your data

This data is collected, collated and then submitted to the Secretary of State, who will appoint an Inspector to conduct an independent examination of the Local Plan. Demographic data will be processed anonymously to assess the effectiveness of our consultation.

Where you have consented, your contact details will be added to our consultation database for future consultations and updates on the Examination in Public.

At submission representations will be made public on the council's website, including name of person and organisation if applicable making representation. Other personal information will remain confidential.

Representations, in full, submitted along with the Local Plan, evidence base and documents Submission Draft Newham required by legislation to the Planning Inspectorate and to the person the Secretary of State appoints as the Planning Inspector. Contact details will be made available to the Inspector and Programme Officer so they can contact individuals to participate in the Examination.

Consultation database is stored on Mailchimp and accessed by planning policy team only. Mailchimp stores names and email addresses of those on the consultation database in line with Mailchimp policies, particularly its [data processing addendum](#). Please be aware they may store personal data external to the UK specifically in the USA and/or EU.

Who we will share your data with

We will only share your data with the Planning Inspector appointed by the Secretary of State, the Programme Officer appointed by Newham, and within the planning policy team. Your name and organisation (if applicable) will be published on our website along with representations upon submission. Demographic data is not shared with the Planning Inspector or the Programme Officer.

We will not share your personal information with any other third parties unless you have specifically asked us to, or if we have a legal obligation to do so.

How long we will keep your data

We will keep your data safe and secure for a period of 15 year(s) in line with our retention Schedule. After this time, it will be securely destroyed.

How do we protect your data

We comply with all laws concerning the protection of personal information and have security measures in place to reduce the risk of theft, loss, destruction, misuse or inappropriate disclosure of information. Staff access to information is provided on a need-to-know basis and we have access controls in place to help with this.

See the [Planning Inspectorate Customer Privacy Notice](#) for details on how they keep your data safe and secure.

Know your rights

We process your data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. Find out about your rights at [Your rights – Processing personal data privacy notice – Newham Council](#) or at <https://ico.org.uk/your-data-matters/> If you have any queries or concerns relating to data protection matters, please email: dpo@newham.gov.uk

Response Form

For guidance on how to complete this representation form please view the Regulation 19 Consultation Guidance <https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh>.

This form has two parts –
Part A – Personal Details: need only be completed once.
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*		2. Agent's Details (if applicable)
<i>*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.</i>		
Title	<input type="text"/>	<input type="text"/>
First Name	<input type="text" value="Alex"/>	<input type="text"/>
Last Name	<input type="text" value="Savine"/>	<input type="text"/>
Job Title	<input type="text" value="Head of Planning Policy & Infrastructure"/>	<input type="text"/>
(where relevant)		
Organisation	<input type="text" value="London Legacy Development Corporation"/>	<input type="text"/>
(where relevant)		
Address Line 1	<input type="text" value=""/>	<input type="text"/>
Line 2	<input type="text" value=""/>	<input type="text"/>
Line 3	<input type="text" value=""/>	<input type="text"/>
Line 4	<input type="text" value=""/>	<input type="text"/>
Post Code	<input type="text" value=""/>	<input type="text"/>
Telephone Number	<input type="text" value=""/>	<input type="text"/>
E-mail Address	<input type="text" value=""/>	<input type="text"/>
(where relevant)		

Please note that contact details for LLDC will change after 30th November 2024 and further information is provided in the attached letter.

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate? (Please be as specific as possible)

Policy

Implementation Text

Paragraph

Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

4 (3) Complies with the
Duty to co-operate

Yes

No

Please tick as appropriate

5. Please give details overleaf of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

See attached letter and schedule. The information included in this form is the same for each individual modification sought.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

See attached letter and schedule providing wording of modifications sought.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

No, I do not wish to participate in hearing session(s)

☐

Yes

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The matters raised in the response and the modifications sought may require further explanation and clarity. While the LLDC will endeavour to agree modifications with the Council ahead of submission of the Plan for examination, it wishes to reserve the opportunity to be able to explain the basis for the modifications sought in person to the inspector.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Do you wish to be notified about:

a. the submission of the local plan for independent examination

Yes ☒ No ☐

b. the publication of the Inspector's report

Yes ☒ No ☐

c. the adoption of the Local Plan

Yes ☒ No ☐

10. Would you like to be added to our consultation database to be notified about future planning policy consultations?

Yes ☒ No ☐

Please return to London Borough of Newham by 5pm 6th September 2024

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

20 September 2024

Dear Planning Policy Team,

Newham Local Plan Refresh, Regulation 19 Consultation: LLDC response

Thank you for the opportunity to formally comment on the London Borough of Newham (LBN) Regulation 19 Draft Submission Local Plan. This letter represents the London Legacy Development Corporation's (LLDC) response as both the current Local Planning Authority (LPA) for its area up until 1st December 2024 as well as a Mayoral Development Corporation (MDC) owning land and assets in the area and having responsibility for advancing plans for development.

Overall, the draft Local Plan continues to be broadly supported and the on-going informal opportunities to cooperate and support its development to date have been very much welcomed, as are those amendments made to the Plan following the Regulation 18 consultation. However, we consider that there are some matters within the current, Regulation 19 draft of the Plan that should be amended in order to make those aspects of it sound and support the successful delivery of development within the borough, including LLDC's own sites projects. The matters that we consider should be addressed are outlined in this letter as well as the table included as Appendix 1 to this letter which sets out the specific wording or other changes required to the Plan. Both this letter and Appendix 1 should therefore be read together.

Tall Buildings policy D4

The overall approach in the policy and the removal of the previous requirement for new buildings to have lower heights than existing buildings in the vicinity are broadly welcomed. However, it is considered important for the Local Plan to retain a degree of flexibility around maximum height restrictions in and around the Stratford Metropolitan Centre area, Stratford Station and areas of transformation as identified in the LBN Characterisation Study (2024), in order to allow for greater height where there will be significant benefit to the townscape and where exceptionally good architecture and public realm and other benefits can be demonstrated and have been tested positively through design review.

LLDC's sites at Stratford Waterfront, Pudding Mill, Bridgewater Triangle and Rick Roberts Way will all deliver major development with significant benefits, including affordable housing, public realm and connectivity improvements. However, as currently drafted, it is considered that enforcing capped height limits in these areas unnecessarily constrains their transformation potential as identified in

the LBN Characterisation Study, and that without a degree of flexibility, the policy has the potential to negatively impact the deliverability of these schemes and the realisation of these benefits. Some flexibility is also considered necessary to be consistent with the London Plan's approach to tall buildings, which requires a design-led approach in determining site capacity.

Affordable housing policy H3

It is noted that there is a significant change from the previous policy as included in the Regulation 18 stage draft Local Plan, which aligned with the London Plan Policy H5 and threshold approach for affordable housing, and sought an affordable housing mix of 65% social rent and 35% intermediate across the 50% affordable housing requirement. We are concerned that the proposed policy now requires sites with the capacity to deliver ten dwellinghouses or more to provide 50% of all housing as social rent housing and 10% as affordable home ownership housing, which is 60% affordable housing in total.

Whilst we support the aspiration in the revised policy to maximise affordable housing including social rented housing within the housing mix, we are concerned about the significant impact of the revised policy on the viability of schemes and therefore the overall delivery of housing and affordable housing across the borough. Whilst the evidence base includes an updated viability assessment to support the Regulation 19 changes, there is no clear or robust evidence, that has been published, to support the increased affordable housing requirement and that this can be viably achieved. This is contrary to both paragraph 34 National Planning Policy Framework (NPPF), the associated Planning Practice Guidance and the London Plan and is likely to result in the majority of developments requiring a viability assessment to determine the maximum viable amount of affordable housing, removing the incentive provided by current London Plan policies for schemes to achieve the 35% or 50% threshold without the need for viability testing.

We are also concerned that the draft policy will essentially not allow the delivery of intermediate housing outside of the 10% affordable home ownership requirement unless this is additional to the 60% affordable housing provision required, impacting the ability to meet local housing needs within other intermediate tenures and achieve mixed and balanced communities. Notwithstanding the viability issues, we consider that there is a need to achieve a range of affordable housing typologies to provide wider housing choice to meet a range of housing needs and achieve mixed and balanced neighbourhoods, which could include other forms of low cost rented housing as well as intermediate housing.

Housing Mix policy H4

We broadly support the policy intent on housing mix but have concerns about the blanket approach set out in the policy which is considered overly prescriptive and does not allow for site specific context and considerations to be properly taken into account. The policy should better reflect the supporting evidence base which shows that there is an acute need for affordable family housing and allow for greater flexibility across market tenures to support this.

Although some exceptions to the policy on housing mix have now been included in the proposed policy, these are very limited and a greater degree of flexibility is required where schemes are clearly providing other major benefits such as the provision of affordable housing, significant infrastructure and regeneration benefits, or where amendments are being sought to schemes with extant planning permissions with an accepted housing mix baseline which will have informed scheme viability and the scope of planning obligations, including the level of affordable housing. The policy should also recognise that there may be some sites where larger family sized units are not considered as suitable

as other sites, and where a greater mix of smaller units would be more appropriate, particularly where higher densities are being promoted by the London Plan and Local Plan.

Through the use of viability assessments to determine housing mix, the draft Local Plan recognises impact of the proposed cap on studios, 1 and 2 bedroom units on viability, however, it would be helpful for the policy to set out how housing mix sits with the Council's other priorities, including the achievement of overall housing delivery and affordable housing which may be compromised. The policy should reflect these other priorities and allow flexibility particularly across market tenures to support the delivery of them.

Embodied carbon and the Circular Economy, policies CE2 and CE3

We welcome the amendments to policies CE2 and CE3 and the inclusion of additional and up to date evidence base to support the policies. The policies now allow for continued use of existing heat networks while ensuring that decarbonisation occurs within the lifetime of the Local Plan. However, it would be helpful for the policy to set out the likely scope of decarbonisation strategies for heat networks and what measure would be supported by the Council. We are proactively exploring options for our own district heat network and would welcome further engagement with the Council on this.

Neighbourhoods and Site Allocations

We welcome some of the updates made to the Site Allocations for LLDC's sites and the incorporation of development principles to more accurately reflect extant planning permissions and feasibility studies. However, there remain a number of discrepancies and inaccuracies, including building heights, which could potentially undermine the deliverability of these sites and should therefore be corrected. We set these out in Appendix 1 together with the proposed changes required to the following Site Allocations:

- Stratford Station;
- Bridgewater Road;
- Pudding Mill; and
- Rick Roberts Way.

In addition, there are a number of site allocations for which we have previously made representations and consider should be included in the Local Plan. These are set out below.

Three Mills Site Allocation: The LLDC Local Plan includes a site allocation for the Three Mills Studios area which promotes appropriate development in the context of its heritage status to support long-term use of the studios and the historic buildings. It is disappointing that this site allocation is not included in the draft Newham Plan and as set out in our response to the earlier Regulation 18 consultation, it would be helpful to understand the rationale for deletion of this site allocation given the strategic importance of the site within the Borough and London.

Stadium Island Site Allocation: As you will be aware, the LLDC previously wrote to the Council requesting a Local Plan Site Allocation to reflect future development potential associated with the London Stadium. It is noted that this has not been included within the Regulation 19 draft of the Local Plan. We continue to consider the inclusion of such a site allocation as an essential aspect of helping to secure the principle of such development here and have attached the previous correspondence on this at Appendix 2.

Stratford Waterfront South - the Aquatics Triangle Site Allocation: We also note that the Aquatics Triangle site has not been included as a Site Allocation, despite this being identified as a significant

site in LLDC's development programme and being put forward for mixed-use development in its Local Plan Call for Sites in December 2021 and made representations to the Regulation 18 consultation. Development of the site would improve the setting and levels of activity along this edge of Carpenters Road and help activate its frontages. The reconfiguration of the current open space area, with compensatory provision at the southern end of the Aquatics Centre would also be beneficial to its setting within Queen Elizabeth Olympic Park. We therefore consider it is important to have a Site Allocation to capture these development principles and reflect the development potential for residential-led development, including affordable housing.

Bow Goods Yard Site Allocation: The LLDC Local Plan has a site allocation which, while recognising the designation of the site as Strategic Industrial Land (SIL), also promotes modernisation and consolidation of the rail and industrial uses within the site and allows consideration of future release for non SIL uses in the future. This is partly intended to help secure the infrastructure that would enable this change, including a bridge connection to Bow West Goods Yard, which would enable site related industrial traffic from Bow Goods Yard to be directed away from the new community developing at Pudding Mill and the nearby Bobby Moore Academy schools. No site allocation has been included in the draft Newham Local Plan and this effectively means that the existing site allocation would be deleted before any development of the site, and the infrastructure that would support development, has come forward. The LLDC's earlier responses to the Newham Local Plan Call for Sites and Regulation 18 consultations identified this as a site allocation that it considers should be carried forward into the new Newham Local Plan.

Although subject to a current planning application which has yet to be determined, a site allocation for the site is still considered to be important to promote positive planning for the future of the site, including potential enclosure of the current open storage and redirection of Heavy Goods Vehicle (HGV) traffic that would result in significant environmental and townscape benefits alongside delivery of high quality buildings, a positive frontage to Marshgate Lane and enhancement of the River Lee waterside area and make an effective link to improvements at Bow West SIL to the west.

Where we have been able to, Appendix 1 outlines proposed amendments that would address the above concerns and make the policy justified, effective and in line with the NPPF and the London Plan, with new text highlighted and deletions struck through. We would appreciate the opportunity to discuss this, and the comments set out in this letter to explore whether there are opportunities to agree a way forward and potentially set out any agreement in a statement of common ground.

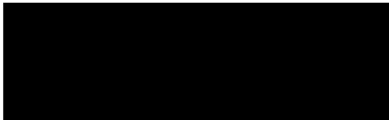
As set out above, from 1st December 2024, the LLDC will cease to be an LPA but will continue to operate as a developer and landowner across a revised area boundary, with a significant portion of this area being within the London Borough of Newham. Therefore, any discussion and correspondence from this date will need to be with the LLDC's Development Directorate.

In the meantime, I trust that you find the response to the Regulation 19 consultation helpful. In the first instance, if you would like to discuss this response please contact Alex Savine, Head of Planning Policy & Infrastructure ([REDACTED]) or Marina Milosev, Team Leader Planning Policy ([REDACTED]) up until 1st December 2024 or Ramona Kayindu, Planning Manager ([REDACTED]) thereafter.

Yours Sincerely,



Irene Man
Director of Planning (Development)



Anthony Hollingsworth
Director of Planning Policy & Decisions

Encl.

Appendix 1: Proposed amendments to the London Borough of Newham Submission Local Plan
(Regulation 19)

Appendix 2: Stadium Island Site Allocation

Appendix 3: N8.SA2 Stratford Station Updated Diagram

Appendix 1: Proposed amendments to the London Borough of Newham Submission Local Plan (Regulation 19)

The following table sets out proposed amendments to the London Borough of Newham Submission Local Plan (Regulation 19) with new text highlighted and deletions struck through.

Policy D4, Tall Buildings page 70

	Current Reg 19 wording	Proposed alternative	Rationale
	2. Tall buildings will only be acceptable, subject to detailed design and masterplanning considerations, in areas designated as 'Tall Building Zones'. The height of tall buildings in any 'Tall Building Zone' should be proportionate to their role within the local and wider context and should not exceed the respective limits set in Table 1 below.	2. Tall buildings will only be acceptable, subject to detailed design and masterplanning considerations, in areas designated as 'Tall Building Zones'. The height of tall buildings in any 'Tall Building Zone' should be proportionate to their role within the local and wider context and should not exceed the respective limits set in Table 1 below. Where relevant and appropriate to the wider context, developments with tall buildings that exceed these limits will need to demonstrate that the proposed heights will significantly benefit the townscape and deliver exceptionally good architecture and public realm. They will also need to demonstrate other benefits that will be delivered.	The overall approach in the policy and the removal of the previous requirement for new buildings to have lower heights than existing buildings in the vicinity are welcomed. However, it is considered important for the Local Plan to retain a degree of flexibility around maximum height restrictions in and around the Stratford Metropolitan Centre area, Stratford Station and areas of transformation as identified in the London Borough of Newham's Characterisation Study, in order to allow for greater height where there will be significant benefit to the townscape and where exceptionally good architecture and public realm

Appendix 1: Proposed amendments to the London Borough of Newham Submission Local Plan (Regulation 19)

			<p>and other benefits can be demonstrated and have been tested positively through design review.</p> <p>Permitted outline schemes at Pudding Mill and Bridgewater Triangle , and site allocations within the LLDC Local Plan, including Rick Roberts way, which will deliver significant development with associated benefits, including affordable housing and public realm and connectivity improvements, have the potential to be negatively impacted by the proposed policy as currently drafted. in the event that amendments or new planning permissions are sought in order to achieve detailed deliverable schemes without this element of flexibility. Given that these sites are identified as areas to be transformed in Chapter 7 of the Newham Characterisation Study (2024), it is considered that enforcing capped height limits in these areas constrains</p>
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Appendix 1: Proposed amendments to the London Borough of Newham Submission Local Plan (Regulation 19)

			their transformation potential and ability to deliver the housing required. It is also considered to be in conflict with the London Plan approach to tall buildings, which requires a design-led approach to determining site capacity.
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Site Allocation N8 SA.2, Stratford, page 475 - 479

	Current Reg 19 wording	Proposed alternative	Rationale
Development Principles	Increased capacity at Stratford Station to be provided through the redevelopment of the ticket hall and new and improved station entrances from Montfichet Road and the Carpenters estate along with residential, employment uses, main town centre uses and social infrastructure including, community facilities and education facilities, and open space.	<p><u>Additional wording to be inserted:</u></p> <p>Increased capacity at Stratford Station and enhanced connectivity to and from the Carpenters Estate, Montfichet Road and Queen Elizabeth Olympic Park should be achieved through comprehensive redevelopment of the site allocation</p> <p>Development at higher densities will be supported where it achieves a high standard of design.</p>	To realise the scale and quality of improvements envisaged to support the transformation of Stratford into an International Centre there is an opportunity for this part of the draft plan to promote the area immediately around Stratford Station as having the potential to deliver significant amounts of new housing, retail and other town centre uses at densities

Appendix 1: Proposed amendments to the London Borough of Newham Submission Local Plan (Regulation 19)

			significantly higher than those in Maryland to reinforce the distinct character of these areas within the neighbourhood. In order for the site allocation to be deliverable we would encourage flexibility in how this achieved as there may be a range of strategies for how the site allocation may be delivered.
Development Principles	<p>The site should be designed and developed comprehensively in accordance with Local Plan Policy BFN2.</p> <p>Building heights should range between 9 – 21m (ca. 3- 7 storeys in proximity to the St John’s Conservation Area and between 21 – 32m (ca. 7 – 10 storeys) in the rest of the site, with taller buildings up to 40m (ca. 13 storeys), 60m (ca. 20 storeys) and 100m (ca. 33 storeys) in defined locations, with consideration given to marking Stratford Station.</p> <p>Development should conserve and enhance the St John’s Conservation Area and its listed buildings and their settings. In responding to the existing character of the town centre and conservation area, the shoulder of proposed</p>	<p>Proposed alternative for paragraph 2:</p> <p>Building heights should vary and respond to the local context range between 9–21m (ca. 3-7 storeys in proximity to the St John’s Conservation Area and between 21–32m (ca. 7–10 storeys) in the rest of the site; with consideration given to taller buildings up to 40m (ca. 13 storeys), 60m (ca. 20 storeys) and 100m (ca. 33 storeys) in defined locations, with consideration given to in appropriate locations marking Stratford Station.</p> <p>Proposed alternative for paragraph 6:</p> <p>The design and layout of the site should create new and improved public realm and walking and cycling routes, including new public spaces and open spaces created through a new station square to the south of the ticket hall, a new</p>	<p>This is a key strategic site that will need to balance the delivery of infrastructure alongside the delivery of homes and affordable homes and we would therefore welcome support for taller elements to be allowed across the site allocation where justified and /or where agreed through a detailed master-planning process that can respond to the specific contextual and local character considerations of the site.</p> <p>Limiting the maximum heights at the levels</p>

Appendix 1: Proposed amendments to the London Borough of Newham Submission Local Plan (Regulation 19)

	<p>buildings in immediate proximity to the conservation area should conserve and enhance the fine grain and townscape character of the continuous frontages of three to four storeys and rooflines. This should contribute to enclosing the space and establishing a sense of place, without affecting the dominance of the St John's Church, which should remain the focal point of the conservation area.</p> <p>The key views, as set out in the Stratford St John's Conservation Area Appraisal and Management Plan, should be protected to conserve and enhance the role of historic landmarks in the conservation area. Development should use a range of materials and detailing that complements the character of the conservation area to enhance its visual richness and quality.</p> <p>Tall buildings should provide a positive contribution to the skyline without harming the background of the protected linear view: King Henry VIII's Mound, Richmond to St Paul's Cathedral (9A).</p> <p>The design and layout of the site should establish a connected network of streets and spaces that connects to the wider street network and should create a street hierarchy.</p>	<p>decked street south of the station towards the Stratford High Street and which improve connectivity for pedestrians and cyclists to and from the Carpenters Estate and the Queen Elizabeth Olympic Park. This should include a new bridge from the station square to Montfichet Road and a new or improved Jupp Road Bridge or equivalent alternative. for walking and cycling</p> <p>Delete paragraph 7: The provision of open space and other green infrastructure should improve connectivity to the Queen Elizabeth Olympic Park from the town centre and West Ham Park and the biodiversity value of the railway green corridor should be maintained where possible.</p>	<p>proposed appears arbitrary, does not take account of the local established context or whether there would be benefit to the townscape or whether, through design review, the scheme has demonstrated exceptionally good design and public realm or other benefits. This approach would fail the soundness test and potentially hinder the deliverability of the site.</p> <p>The site allocation currently conveys a rigid interpretation of the street bridge and potential green space which could create an unrealistic expectation for there to be a large amount of green infrastructure over the DLR line. The focus of the site allocation should be on improving connectivity and public realm improvements and that matters of greening be controlled in the normal way through detailed design and policies requiring urban greening and biodiversity net gain.</p>
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Appendix 1: Proposed amendments to the London Borough of Newham Submission Local Plan (Regulation 19)

	<p>The design and layout of the site should create new and improved public realm and walking and cycling routes, including new public spaces and open spaces created through a new station square to the south of the ticket hall, a new decked street south of the station towards the Stratford High Street and a new bridge from the station square to Montfichet Road and a new or improved Jupp Road Bridge for walking and cycling.</p> <p>The provision of open space and other green infrastructure should improve connectivity to the Queen Elizabeth Olympic Park from the town centre and West Ham Park and the biodiversity value of the railway green corridor should be maintained where possible.</p> <p>The design and layout of the site should also enable improved connections between the station across the Stratford High Street and Great Eastern Road through to N8.SA1 Stratford Central.</p> <p>Development should significantly improve the public realm and the environment for walking and cycling at Montfichet Road, including by reducing carriageways and repurposing residual space.</p> <p>Active frontages should front the station square and the decked street south of the</p>		<p>This will ensure that a full range of options can be explored and provide the requisite flexibility needed at this early stage in the Stratford station project to ensure that the site allocation is deliverable over the lifetime of the plan.</p>
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Appendix 1: Proposed amendments to the London Borough of Newham Submission Local Plan (Regulation 19)

	<p>station as well as on the Stratford High Street and Great Eastern Road.</p> <p>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. Bus stands can be located under over-station development.</p> <p>Design measures should minimise exposure to poor air quality, particularly on the Stratford High Street, Montfichet Road and Great Eastern Road in accordance with Local Plan Policy CE6.</p> <p>The design and layout of the site should mitigate the impact of noise from the railway and transport operational uses.</p> <p>Sustainable drainage should be considered from the outset and meet the requirements of Local Plan Policy CE8. The design and layout of the site should take account of risk of flooding from all sources and meet the requirements of Local Plan Policy CE7.</p>		
Infrastructure Requirements	<p>Increased station and interchange capacity through improved circulation, new ticket hall and new station entrances.</p> <p>A bridge should be provided from the new station square to Monfichet Road.</p>	<p>Proposed alternative to paragraphs 5-6:</p> <p>Public realm improvements should incorporate high quality landscaping (including trees where appropriate) and respond to opportunities to</p>	<p>In order for the site allocation to be deliverable over the lifetime of the Plan, the site allocation wording should be amended in order for the most appropriate</p>

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	<p>Reconfiguration of Monfichet Road should enable the creation of a new station entrance, provided that the existing substation is relocated or reprovided.</p> <p>A school should be re-provided as part of the redevelopment of Jubilee House and Broadway House in accordance with Local Plan Policy SI4.</p> <p>Development should address open space deficiencies by providing a pocket park or a series of pocket parks as part of the new public spaces. The open space provision should prioritise community growing opportunities.</p> <p>In addition to the open space provision, development should provide publicly accessible play space in the form of a Local Area for Play in the form of playable public realm and a Locally Equipped Area for Play. Play space should meet the requirements of Local Plan Policy GWS5.</p> <p>Land should be safeguarded for double tracking the DLR route.</p>	<p>enhance greening in the town centre</p> <p>Development should address open space deficiencies by providing a pocket park or a series of pocket parks as part of the new public spaces. The open space provision should prioritise community growing opportunities.</p> <p>In addition to the open space provision, development Development should provide publicly accessible play space in the form of a Local Area for Play in the form of playable public realm and meet the playspace requirements of Local Plan</p>	<p>greening strategy to be considered as part of the rigorous assessment of options which is currently ongoing and not resolved. The changes proposed will mean a full range of options can be explored provide the requisite flexibility needed at this early stage in the Stratford station project to ensure that the site allocation delivers public realm and connectivity improvements in the most effective way.</p>
Site Allocation Map		<p>The site allocation map should be amended to:</p> <p>Remove the green shading over the DLR tracks. The Map currently creates an unrealistic sense that there would be a linear green space or</p>	<p>The site allocation currently conveys a rigid interpretation of the street bridge and potential green space which could create an unrealistic</p>

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		<p>pocket park and whilst we share the ambition to green the public realm we consider the area being designated as an opportunity for public improvement would support a range of options, including greening to come forward.</p> <p>The Raised Street and Bridge should end immediately adjacent to Stratford Station. It should not extend to Stratford High Street as the map currently creates a sense that the bridge must terminate here and it may be the case, that through detailed design testing, other possibilities emerge as the Stratford station project is at an early stage in the design process.</p> <p>See Appendix 3.</p>	<p>expectation for there to be a large amount of green infrastructure over the DLR line. We would encourage the focus of the site allocation to be on improving connectivity and public realm improvements and that matters of greening be controlled in the normal way through detailed design and policies requiring urban greening and biodiversity net gain.</p>
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Site Allocation N8.SA7 Rick Roberts Way, page 496

	Current Reg 19 wording	Proposed alternative	Rationale
Development Principles	<p>Residential, employment uses, sports and recreation uses, education and open space.</p> <p>Development should deliver sports hall provision. Provision should meet the needs identified in the Built Leisure Needs Assessment (2024) and be delivered in accordance with the requirements of Local Plan Policies SI2 and SI3.</p> <p>Development should protect and enhance existing sports and recreation uses in</p>	<p>Residential-led mixed use development with; employment uses, sports and recreation uses; education uses and open space.</p> <p>Development should deliver sports hall provision. Provision should meet the needs identified in the Built Leisure Needs Assessment (2024) and be delivered in accordance with the requirements of Local Plan Policies SI2 and SI3.</p> <p>Development should protect and enhance existing sports and recreation uses in accordance with Local Plan Policies SI1 and SI3.</p>	<p>The requirement to provide a sports hall is not in line with the extant outline permission for Rick Roberts Way (ref. 11/90621/OUTODA as varied by 18/00471/VAR) or the current site allocation in the LLDC Local Plan 2020–2036. Both of these documents</p>

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	accordance with Local Plan Policies SI1 and SI3.		prioritise the delivery of residential-led development and a school. Furthermore, it should be noted that the existing sports facility on-site is approved as a meanwhile use for a specified temporary period only (18/00162/FUL as varied by 23/00140/VAR), under and in accordance with LLDC Policy B.3: <i>Creating Vitality through Interim Uses</i> . This policy clearly states that interim uses should not impact the deliverability of the site allocations within the Local Plan or existing permanent planning permissions. The sports facility is an interim use intended solely to activate the site until the long-term developments come forward. Therefore, the requirement to protect and enhance the current sports facility is
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			<p>directly contrary to the LLDC policy under which the temporary permission for the sport facilities has been approved, it is also not in line with the extant planning permission for the comprehensive redevelopment of the site and not in line with the current site allocation . The Urban Design and Landscape Framework (UDLF) for Rick Roberts Way which was jointly prepared by LLDC, the London Borough of Newham and National Grid/St William, does identify the potential for sports and leisure provision within the proposed school on land owned by the London Borough of Newham, but it is not envisaged as a reprovision of existing temporary facilities.</p>
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Development Principles	The employment use should be consistent with Local Plan Policy J1 and should prioritise light industrial floorspace.	Delete: The employment use should be consistent with Local Plan Policy J1 and should prioritise light industrial floorspace.	<p>The proposed requirement for the site allocation to deliver employment uses, as outlined in draft Policy J1 (Employment and Growth), prioritising light industrial uses, is not in line with the extant outline permission for Rick Roberts Way nor the current site allocation in the LLDC Local Plan. Both the outline permission and the Local Plan seek to provide active frontages through retail and predominantly envisage residential developments and a school.</p> <p>The Rick Roberts Way site falls entirely outside any industrial land designation in both the current LLDC Local Plan and the proposed Newham draft Local Plan Policy J2, as indicated on the map on page 188. Therefore, there is no requirement for this land</p>
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			<p>to deliver industrial uses. While Policy J1 (Employment and Growth) encourages employment uses, this does not mandate industrial uses on a site that is not designated as industrial.</p> <p>Overall, this requirement is incompatible with the approved uses in the extant outline permission and contradicts the guiding aspirations of the UDLF. As such, it could significantly undermine the delivery of already intended strategic uses such as new homes and a school.</p>
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Site Allocation N8.SA9: Pudding Mill, page 503

	Current Reg 19 wording	Proposed alternative	Rationale
Development principles	The employment uses should be consistent with Local Plan Policy J1 and prioritise industrial floorspace, including co-location with residential as part of the development around the Pudding Mill DLR Station and at Legacy Wharf. Development to the west of Cooks Road should be consistent with the	The employment uses should be consistent with Local Plan Policy J1 and prioritise industrial floorspace; and seek to integrate industrial floorspace, including co-location with residential as part of the development around the Pudding Mill DLR Station and at Legacy Wharf. Development to the west of Cooks Road should	In order for the site allocation to be deliverable and in line with the extant planning permission, the wording should be amended as it currently requires

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	Local Mixed Use Area designation. Development should provide the same quantity of business and industrial floorspace as the permitted schemes.	be consistent with the Local Mixed Use Area designation. Development should provide the same quantity of business and industrial floorspace as the permitted schemes.	employment uses to prioritise industrial use. The wording limits the type of employment uses that should come forward and the employment floorspace in the outline consent predominantly includes commercial and business uses. There should therefore be an element of flexibility on the type of employment uses that should come forward on site.
Design Principles	Building heights should range between 21-32m (ca. 7-10 storeys) with taller buildings up to 50m (ca. 16 storeys) to add wayfinding, with consideration given to marking the Pudding Mill Local Centre.	Building heights should range between 21-32m (ca. 7-10 storeys) with taller buildings up to 50m 100m (ca. 16 33 storeys) to add wayfinding, with consideration given to marking the Pudding Mill Local Centre.	The proposed draft text in the second paragraph of the design principles is not consistent with the extant outline consent or the current site allocation in the LLDC Local Plan, particularly regarding the height restriction of up to 16 storeys for taller elements. The outline consent includes taller elements that exceed this limit, with a maximum height of 95m. The policy should

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			therefore be amended to accurately reflect this.
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Site Allocation N8.SA8 Bridgewater Road, page 500

	Current Reg 19 wording	Proposed alternative	Rationale
Development principles		Building heights should could range between 21-32m (ca. 7-10 storeys) with taller buildings up to around 50m (ca. 15 storeys) in the east and south east of the site. Massing should step down towards adjacent to the allotments in the north of the site should be to sensitively integrate with the low rise context designed to protect amenity and prevent overshadowing.	The site allocation for Bridgewater Triangle (BWT) includes a height limit of 50m (c. 16 storeys), reflecting the outline consent for the site. However, it has been necessary to review the current outline consent in order to address viability and deliverability challenges arising from macro-economic conditions as well as regulatory changes including the new fire safety regulations. In light of this, capping heights at certain limits within the site allocation is unduly prescriptive and would have a negative impact on proposed amendments and/or new planning applications that seek to optimise the

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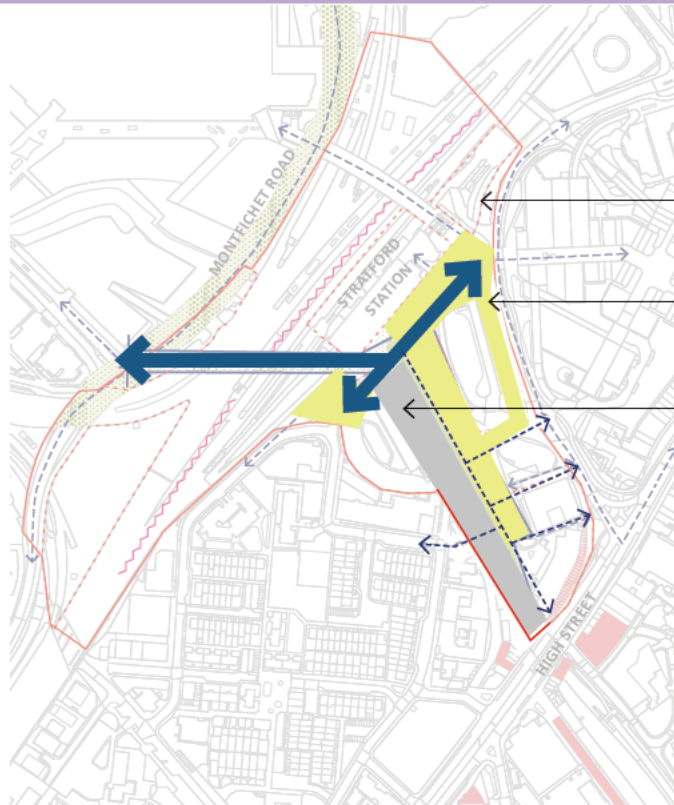
			<p>site’s capacity in order to provide a deliverable housing scheme, including affordable housing.</p> <p>The Tall Building Annex in The Newham Characterisation Study (2024) states that varying heights within Tall Building Zones are intended to allow for the establishment of a borough-wide spatial hierarchy, transitioning heights to the surrounding context and sensitive areas and creating a coherent townscape and skyline. The wording of the site allocation does not reflect this approach as the site is immediately adjacent to areas with greater height limits and therefore should be optimised in a form which fits with the existing context as well as the wider emerging context for the area.</p>
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			Provided that the amenity of allotment holders can be protected, it is considered that there should be some flexibility in height in this site allocation.
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N8.SA2 Stratford Station

Map



Key:

- Site boundary
- - - Key route
- ↔ Raised street and bridge
- ~~~~~ Sensitive edge (noise - pollution - infrastructure)
- ▨ Sensitive edge (heritage assets - low rise context)
- Opportunity for green space
- Opportunity for public realm improvement
- ▭ Listed/Locally listed buildings

Remove all dotted red lines

Extend opportunity for public realm improvement

Show rail tracks / existing base map in this area

Remove