

James Scantlebury

From: Richard Carr <[REDACTED]>
Sent: 30 August 2024 09:38
To: Local Plan
Cc: [REDACTED]
Subject: TfL response to Newham Draft Submission Local Plan
Attachments: Newham Local Plan Reg. 19 Consultation - TfL response FINAL.pdf; Appendix B to TfL Reg. 19 response - TfL Infrastructure Protection Plans.pdf

Thank you for consulting Transport for London (TfL). I attach TfL's statutory response to the Newham Draft Submission Local Plan. The detailed comments have also been included with the response sent by GLA.

Best wishes
Richard Carr

Richard Carr | Principal Planner - Spatial Planning (He/Him/His)
TfL Planning, Transport for London
E: [REDACTED]

I work part time and so there may be a short delay in responding to emails

TfL Spatial Planning is committed to equity, diversity and inclusion and we strive to ensure that Londoners are fully represented in the planning process

For more information regarding TfL Spatial Planning, including TfL's *Transport assessment best practice guidance* and pre-application advice please visit: <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-applications/pre-application-services>

From: Planning Policy Team <localplan@newham.gov.uk>
Sent: 19 July 2024 15:22
To: Richard Carr <[REDACTED]>
Subject: The Newham Draft Submission Local Plan is open for consultation!

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This email is being sent on behalf of **Newham Council's Planning Policy Team**.

You are invited to [make representations on the Newham Draft Submission Local Plan](#).

We are pleased to inform you that the Newham Draft Submission Local Plan has been published in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This is the final consultation before the submission of the Local Plan to central government for examination and it is taking place from 19th July 2024 to 6th September 2024.

Representations should be made by **5pm on 6th September 2024**.

The Newham Local Plan serves as the primary planning document used to assess planning applications and manage areas for regeneration and development in Newham to 2038. The refreshed plan aims to deliver our key objectives: inclusive growth, delivering a fairer Newham and addressing our climate emergency. The Local Plan contains policies on design, high streets, inclusive economy, housing, climate emergency, transport, neighbourhoods, green and water spaces, waste and utilities and social infrastructure as well as 45 site allocations.

The Regulation 19 consultation requires comments to focus on the 'legal compliance' and 'soundness' of the Local Plan and whether we have complied with the Duty to Cooperate. Our [Regulation 19 Consultation Guidance](#) explains what this means in more detail and contains advice on how to write a representation. The Newham Draft Submission Local Plan, the Integrated Impact Assessment, Submission Policies Map and Regulation 18 Consultation Report are available to view on the [council's website](#), [Newham Co-Create](#) and in-person at Newham libraries and Newham Dockside. The full details of where documents can be inspected in [our Statement of Representations Procedure document](#).

To see your responses to the previous consultations and how we have addressed your feedback, you can view our consultation reports for the [Issues and Options](#) and [Regulation 18](#) consultations here.

Have your say!

There are many ways you can submit a representation:

- **Online response form:** submit responses using the online response form on Newham Co-create
- **Downloadable response form:** submit responses using the downloadable response form on Newham Co-create and Newham's Regulation 19 consultation webpage and return the downloadable response form by:
 - **Email** to localplan@newham.gov.uk
 - **Post** to the Planning Policy Team, London Borough of Newham, Newham Dockside, 1000 Dockside Road, London E16 2QU.
 - **In-person** to our drop-in sessions (see below)
- Hard copies of the response form are also available at Newham Libraries and Newham Dockside and can be returned by email or post, using the addresses above.

For further information or to ask any questions, contact us via email localplan@newham.gov.uk, or come to our online informative session or attend one of our drop-in sessions.

Events	Date	Where to go	Information
Online Informative Session	Thursday 25 th July 2024 19:00-20:00	Microsoft Teams – Sign up to Eventbrite Event here .	The online informative session will give you an overview of the Newham Draft Submission Local Plan and how to provide responses using the online or downloadable response form. This will be followed by a Q&A with members of the policy team.
Drop-in Session 1	Saturday 27 th July 2024 14:00-16:00	East Ham Library, 328 Barking Road, London E6 2RT	The drop-in sessions give you the opportunity to ask the policy team any questions you have on the Newham Draft Submission Local Plan. They will also be able to assist you with submitting a representation.
Drop-in Session 2	Tuesday 30 th July 2024 18:30-20:30	Royal Docks Activity Centre, Albert Rd, London E16 2JB	
Drop-in Session 3	Thursday 8 th August 2024 10:00-12:00	Canning Town Library, 18 Rathbone Market, London E16 1EH	

Drop-in Session 4	Saturday 10 th August 2024 10:00- 12:00	Stratford Library, Hopkins Room, 3 The Grove, London E15 1EL	
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If you would like to be kept informed on the Local Plan Review, sign up to the Local Plan mailing list [here](#).

Have your say before 5pm on the 6th September 2024.

Yours sincerely,
Ellie Kuper Thomas
Planning Policy Manager



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30 August 2024

Consultation on Newham draft local plan (Regulation 19)

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.

Thank you for giving TfL the opportunity to comment on the Regulation 19 version of the Newham local plan.

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.

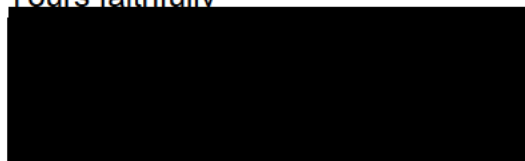
We welcome the positive changes made to the Local Plan in response to our comments at the Regulation 18 stage of consultation. We also welcome the continued support for public transport and active travel improvements, including major projects at Stratford station and potential DLR extensions. We are

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. 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.

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. 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.

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. Appendix B in a separate attachment contains plans showing TfL infrastructure.

Yours faithfully



Josephine Vos

London Plan and Planning Obligations Manager

Email: 

Appendix A: Detailed comments and suggestions for amendments – updated to reflect changes to the Local Plan

Policy	Regulation 18 response	Regulation 19 updated response
BFN1: Spatial Strategy	<p>We welcome in part 1 of the policy the strategic role the Royal Docks and Beckton Riverside Opportunity Areas have and the clear support for the delivery of new DLR stations and a redesigned Stratford station to support new housing and growth.</p> <p>We suggest amending the wording of part 1aii, replacing ‘supported by an extension to the DLR’ with ‘unlocked by an extension to the DLR’.</p>	<p>We welcome the amended wording in part 1ai in relation to the DLR extension.</p>
BFN2: Co-Designed Masterplanning	<p>TfL has welcomed this approach particularly through the development of existing and new transport infrastructure. We suggest further explanation in the justification text of complex sites with the need for transport improvements or new transport provision. For these, the applicant should evidence how an integrated approach to the delivery of transport infrastructure has been considered and the existence of arrangements to ensure its timely delivery to benefit the future and existing population.</p>	<p>We welcome the new wording in the implementation text of BFN2.2.</p>
BFN4: Developer Contributions and Infrastructure Delivery	<p>In part 1.b. and part 3 necessary public transport improvements should be prioritised alongside affordable housing to ensure consistency with London Plan Policy DF1D which states that ‘...applicants and decision-makers should firstly apply priority to affordable housing and necessary public transport improvements...’ In many cases development may not be viable or ‘workable’ without the necessary public transport and active travel improvements to provide access, connectivity and capacity.</p>	<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. 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>
D2: Public Realm Net Gain	<p>We welcome the requirement in part 2.b. which includes ‘integrating the highways and public rights of way network directly adjacent the site into the site design so it can be considered together, through the application of the Healthy Streets Framework and London Plan (2021) Policy D8, and any relevant local</p>	

Policy	Regulation 18 response	Regulation 19 updated response
	<p>design guidance and code. However, the London Plan Policy reference should also include Policy T2: Healthy Streets.</p> <p>In part 3 we recommend that reference is made to the findings of an Active Travel Zone Assessment which can provide an evidence-based justification for public realm improvements, for which planning obligations should be secured. The policy could also provide specific encouragement for reductions in and rationalisation of on and off-street car parking to improve the public realm and make it more inclusive.</p> <p>In DT2.3 and DT2.4 we welcome the prioritisation of active travel projects including Low Traffic Neighbourhoods, Healthy Streets and School Streets.</p>	<p>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.</p>
HS7: Delivery Led Businesses	<p>We support the requirements for new or intensified dark kitchens, dark shops and micro fulfilment centres to provide accessible, safe facilities for drivers/couriers, including sheltered waiting space, toilets and secure cycle parking and to be supported by an adequately resourced Servicing and Travel Plan which aims to maximise deliveries by bike or cargo bike and support sustainable travel consistent with policies T3: Transport Behaviour Change and T4: Servicing a Development.</p>	<p>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.</p>
T1: Strategic Transport	<p>We welcome the approach of this policy which is broadly in accordance with London Plan Policy T3.</p> <p>It would be helpful if part 1.b.iii. were expressed as ‘Buses—priority measures, stops, stands (including drivers’ facilities), stations and garages and bus depots’. This is clearer than the existing reference to bus depots and includes street infrastructure that may need protection from the impacts of development. This point should also be reflected in T1.1 Implementation under point 4 – Buses.</p> <p>It would be helpful if section T1.1 could also refer to projects and interventions that support delivery of TfL’s Bus Action Plan</p> <p>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.’</p> <p>In part 2.a. it should be clarified that strategic transport schemes should be designed to ‘increase public transport mode share and active travel’ because</p>	<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>We note that no change has been made in response to this point.</p> <p>We welcome revised wording in the second sentence in T1.1 to address this point.</p> <p>We welcome the addition of a reference to active travel in part 2.a.</p>

Policy	Regulation 18 response	Regulation 19 updated response
	<p>some major improvements may be aimed primarily at increasing cycling and walking.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <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 note that no change has been made to address this point.</p> <p>We note that no change has been made to address this point.</p> <p>We note that no changes have been made to the policy to address these points.</p> <p>We welcome the addition of a reference to the LPG in T1.1 – Implementation.</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>

Policy	Regulation 18 response	Regulation 19 updated response
T2: Local Transport	<p>We welcome the requirement for development to support 15-minute neighbourhoods, improve air quality, maximise health benefits, reduce carbon emissions and deliver sustainable growth, and points a–f to achieve this.</p> <p>We welcome support for the delivery of Low Traffic Neighbourhoods, School Streets and Healthy Streets.</p> <p>We support the requirement for development to provide or contribute towards wayfinding, including Legible London and TfL cycle hire provision as part of a wider London network.</p> <p>The Planning Obligations section also identifies contributions towards local transport and public realm improvements. For clarity, it would be helpful to include this as part of the core policy.</p> <p>We support the requirement in T2.1 that ‘Development should show that the design of the scheme prioritises walking, cycling and public transport and discourages vehicle use’ and measures set out to achieve this.</p> <p>We look forward to providing input to the emerging Sustainable Transport Strategy to include a Walking Strategy and a Cycling Strategy. These documents should identify the existing route networks, barriers and gaps in provision, and proposals to address those barriers/gaps so that they provide an evidence base for seeking contributions from development.</p> <p>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.’</p> <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 the inclusion of additional wording in T2.1 to address this point.</p> <p>We welcome the amended references to the 83 per cent target throughout the document.</p>
T3: Transport Behaviour Change	<p>We strongly support the requirement in part 1 that all development will be car free, which is consistent with London Plan Policy T6. It may be helpful to clarify that Blue Badge parking is an exception for both residential and commercial uses. Part 1.b. which states that ‘Car parking for commercial or industrial uses</p>	<p>We welcome clarification relating to Blue Badge parking.</p>

Policy	Regulation 18 response	Regulation 19 updated response
	<p>must be the lowest justified quantity' could be seen as inconsistent with the commitment for development to be car free. For consistency with the London Plan, it may be better to state that 'Where justified for operational purposes, a very limited amount of vehicle parking may be provided for commercial or industrial uses within the maximum standards set by the London Plan.'</p> <p>Part 1.c., 'For residential developments mobility scooter parking may be considered instead of additional blue badge spaces in areas of the borough with high levels of public transport accessibility and close to accessible stations' is supported in principle, but it should be clarified that London Plan requirements for parking provision for disabled residents in Policy T6.1 would generally be applied and that parking for mobility scooters would only be considered as an exception where justified. In such circumstances it must also be demonstrated that the route to/from accessible public transport is accessible and that there are a range of local services and facilities within easy reach of all people, including those who need step free routes</p> <p>In part 1.d. care should be taken with provision of car club bays in areas with high levels of connectivity where they may serve to encourage and facilitate car use for journeys that could be undertaken by walking, cycling or public transport.</p> <p>We support the requirement in part 3 for cycle parking in line with or higher than the minimum London Plan standards. This should consider both quality and quantity, including minimum levels of provision for non-standard cycle parking and demonstrating inclusive design.</p> <p>In part 4, charging of batteries for e-bikes may be best located away from cycle parking areas due to fire safety concerns. Batteries for e-bikes can generally be detached and charged at a conventional socket within the home.</p> <p>In part 5.c., it is not clear why major development with zero car parking on-site should contribute towards Electric Vehicle Charging Points elsewhere in the borough unless this is to cater for delivery and servicing vehicles. We would however encourage active EVCP for all disabled persons' parking and any parking justified for operational purposes (including all taxi ranks).</p>	<p>We welcome clarification that any car parking for commercial or industrial uses should be within the maximum standards set by the London Plan.</p> <p>We welcome clarification of the requirements for mobility scooter parking in part 1.c. and T3.1</p> <p>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.</p> <p>We note that this approach has not changed but we understand that it is to cater for delivery and servicing vehicles.</p>

Policy	Regulation 18 response	Regulation 19 updated response
	<p>For clarity and consistency, the requirements for Blue Badge parking in T3.1 should refer to London Plan Policies T6.1 (for residential) and T6.5 (for non-residential uses).</p> <p>Rather than setting out details of parking design in a Design and Access Statement and Landscaping Assessment it would be appropriate to require a Parking Design and Management Plan in line with Policy T6 of the London Plan.</p> <p>In T3.6 it would be helpful to include a reference to Transport Assessments which provide a basis to identify impacts on the transport network and to determine the need for appropriate mitigation.</p> <p>N/A</p>	<p>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> <p>We welcome the amended reference to a Parking Design and Management Plan in T3.3.</p> <p>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> <p>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.'</p>
T4: Servicing a development	<p>Although it is made clear in T4.1, the core policy should include requirements for Construction Logistics Plans and Delivery and Servicing Plans, in line with London Plan Policy T7. Similarly, the core policy should include a presumption that servicing should take place off street wherever possible and that on street servicing should be an exception and only where it does not impact the safety, comfort and convenience of people walking and cycling, public transport users and public transport operations. We welcome support for cargo bikes. These should take precedence over zero emission vehicles which still cause congestion and increase road danger.</p> <p>Reference to the safety implications in T4.3 should encourage accreditation such as Fleet Operator Recognition Scheme (FORS) and Construction Logistics and Community Safety (CLOCS).</p>	<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. 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>We welcome the recommendation of accreditation schemes in T4.3.</p>
T5: Airport	<p>We support the requirement that 'Development proposals should improve sustainable access to the airport site for both airport passengers and staff alike' and that this should include reductions in car parking and improved public</p>	<p>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</p>

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	<p>transport access. It would be helpful for the core policy refer to active travel improvements as mentioned in T5.5. These requirements should be confirmed in the Planning Obligations section.</p> <p>We note that the Council does not require another new Elizabeth line station to facilitate growth in the Royal Docks, although a privately funded station to improve access to the airport would be supported. Any privately funded station would need to be fully assessed using TfL modelling, and the financial, operational and construction issues would be significant such that we strongly recommend alternative measures to improve access to the airport by sustainable and active modes.</p>	<p>sought from airport developments for improved public transport and active travel access to the airport.'</p>
N1/N17: Gallions Reach	<p>We suggest that Beckton Riverside is included in the title for clarity.</p> <p>We strongly support point 4: 'radically reducing car parking and the dominance of road infrastructure across the Neighbourhood'.</p> <p>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.</p> <p>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.</p>	<p>We note that no change has been made in response to this point.</p> <p>We note that no change has been made in response to this point.</p> <p>We welcome changes that have been made to N17 and N17.SA1 to reflect this point.</p>

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	<p>If development levels were high enough, we would likely want to provide additional capacity for Gallions Reach, potentially through uplifts linked to a Thamesmead extension. This would require a funding and delivery strategy.</p> <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.’</p> <p>We recommend that a potential bus, walking and cycling crossing of the Roding between Beckton and the River Road area in Barking & 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 Policies: 2021-2037” in its transport evidence base. This should also be marked on your proposals map.</p> <p>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.</p>	<p>We welcome changes that have been made to N17 and N17.SA1 to reflect this point although we note that references should be to the Royal Borough of Greenwich.</p> <p>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. We recommend that this project is included in N17 and on the proposals map for consistency.</p> <p>We note that no change has been made in response to this point.</p>
N1.SA1/ N17. SA1: Beckton Riverside	<p>See comments regarding DLR in N1 which would apply to this site.</p> <p>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.</p> <p>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</p>	<p>We welcome changes that have been made to N17 and N17.SA1 to reflect this point.</p> <p>We welcome clarification regarding the release of safeguarded land.</p> <p>We note and support the updated wording which provides flexibility and greater certainty on phasing of development.</p>

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	<p>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.</p> <p>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.</p> <p>The infrastructure requirements should require a joint stakeholder approach between landowners, infrastructure providers and authorities.</p>	<p>We welcome clarification of the status of the district centre.</p> <p>We welcome amended wording in the infrastructure requirements.</p>
N2/N1: North Woolwich	<p>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.</p> <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.</p> <p>The agent of change principle also applies to the Woolwich Ferry and the new bus garage on Factory Road.</p>	<p>We note that no change has been made in response to this point.</p> <p>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. 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>
N2.SA1/N1.SA1: North Woolwich Gateway	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

Policy	Regulation 18 response	Regulation 19 updated response
		<p>N1.SA1. 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>We attach a plan in appendix 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: '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.'</p>
N2.SA2/N1.SA2: Rymill Street	We support the connectivity requirements, being a new east to west route across the north of the site and a north to south route across the centre of the site.	
N3/N2: Royal Victoria including Thames Wharf	<p>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.</p> <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.</p> <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.</p>	<p>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.</p> <p>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>Although no change has been made to the infrastructure requirements we note that Policy T1 now explicitly mentions bus stands.</p>
N3.SA1/N2.SA1: Silvertown Quays	Under 'Infrastructure requirements', the need for significant funding for transport improvements is needed to mitigate the impacts of trip generation. The 2016	We welcome inclusion of the following in the Infrastructure Requirements with the minor correction as shown:

Policy	Regulation 18 response	Regulation 19 updated response
	<p>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>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.</p>	<p>'Development should contribute to active and public transport upgrades, including upgrades at Pontoon Dock Station, including upgrading escalators to improve access.'</p> <p>We welcome the new wording in the design principles of N2.SA1 which has updated the green infrastructure requirements.</p>
N3.SA2/N2.SA2: Lyle Park West	<p>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.</p>	<p>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.'</p> <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: '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.'</p>
N3.SA3/N2.SA3: Connaught Riverside	<p>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.</p>	<p>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.'</p> <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: 'The potential constraint of</p>

Policy	Regulation 18 response	Regulation 19 updated response
		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.'
N3.SA4/N2.SA4: Thameside West	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.	<p>We note that no changes have been made in response to this point.</p> <p>We attach plans in appendix 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.</p> <p>To ensure soundness the following wording should be added as an infrastructure requirement: '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.'</p>
N4/N3: Royal Albert North	<p>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 the Royal Docks DLR stations serving the area will be necessary, and a contribution secured from developers to mitigate impacts. Permeability for people walking and cycling will be expected to/from the dockside and throughout the area.</p> <p>Residential and other noise sensitive development must take account of the agent of change principle in relation to the DLR, highways and the airport.</p>	<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 mitigation to manage any adverse impact identified to the operation of the station as a result of development of the site allocation.'</p> <p>'Development should deliver platform lengthening and secondary means of escape at Royal Albert DLR Station.'</p>
N4.SA1/N3.SA1: Royal Albert North	Royal Albert DLR station would be the main station serving this site, although it has two-car platforms only. Our position remains (as per the extant planning permission for the Royal Albert Dock development) that platform lengthening and a secondary means of escape are necessary should there be significant development around the station or along the DLR corridor. A Grampian condition or obligation similar to that permission is required for any new planning consent. Improvements may also be required to the other DLR stations and to bus and	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.'

Policy	Regulation 18 response	Regulation 19 updated response
	<p>active travel provision depending upon the nature and quantum of new development.</p> <p>Regardless of any safety concerns, development of sufficient size would result in a request for contributions towards DLR platform extensions to spread out passengers, minimise dwell times and manage peak crowding.</p> <p>If development levels were high enough, we would likely want to provide additional capacity for Royal Albert and Beckton Park, potentially linked to a Thamesmead extension. This would require a funding and delivery strategy.</p>	<p>'Development should deliver platform lengthening and secondary means of escape at Royal Albert DLR Station.'</p> <p>We attach a plan in appendix 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).</p> <p>To ensure soundness the following wording should be added as an infrastructure requirement: '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.'</p>
N5/N4: Canning Town (and Custom House)	<p>We welcome support for capacity improvements to Canning Town station. Development contributions are required to enhance the station's ability to manage crowds. The implications of planned increases to frequencies on the DLR must be taken into account, as well as demand for access to/from the station and areas to the west and north.</p> <p>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.</p> <p>Any reconfiguration of the bus station will need to ensure conformity with London Plan Policy T3 and London Plan Guidance on Sustainable Transport, Walking and Cycling. TfL, as owner and operator of the bus station, must take a leading role in developing any proposals. Ultimately, it will be TfL's decision whether to proceed with any changes put forward. The bus station is currently operating at capacity, therefore the existing capacity must be safeguarded and enhanced to cater for future demand.</p> <p>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.</p>	<p>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> <p>We note that no change has been made in response to this point.</p> <p>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.'</p> <p>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.</p>

Policy	Regulation 18 response	Regulation 19 updated response
	Provision of bus services in the area must ensure it serves new developments and existing communities, and improved permeability for people walking and cycling in needed throughout the area.	
N5.SA1/N4.SA1: Canning Town East		
N5.SA2/N4.SA2: Silvertown Way East		
N5.SA3/N4.SA3: Canning Town Holiday Inn		
N5.SA4/N4.SA4: Limmo	<p>Comments in N5 above regarding potential DLR extensions, reconfiguration of Canning Town bus station and the need to protect bus infrastructure apply to this site as well.</p> <p>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.</p>	<p>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.'</p> <p>We welcome the amended wording to address this point.</p>
N5.SA5/N4.SA5: Canning Town Riverside	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.	<p>We welcome amended wording in the design principles and infrastructure requirements for site N4.SA5 to address these points.</p> <p>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>

Policy	Regulation 18 response	Regulation 19 updated response
		<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.</p> <p>To ensure soundness the following wording should be added as an infrastructure requirement: '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.'</p>
N5.SA6/N5.SA1: Custom House Phase 1/ Freemasons Road	<p>Under 'Infrastructure requirements' the following should be added: 'Development should provide bus standing and drivers' facilities.'</p> <p>The map should clarify if a new primary vehicle route is proposed to connect to Victoria Dock Road (a bus only circulation route is proposed in the emerging planning application for the site).</p> <p>Update – change Crossrail to Elizabeth line.</p>	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.'
N5.SA7: Custom House Phase 2		
N5.SA8: Custom House Phase 3		
N6: Manor Road	<p>We support the principle of measures to address severance and provide new and improved connections, eg to West Ham station. These should be delivered through developer contributions or other funding sources because TfL is not currently able to commit funding.</p> <p>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.</p>	We note that this point is addressed in the infrastructure requirements for sites in Three Mills (N7).
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).

Policy	Regulation 18 response	Regulation 19 updated response
N7.SA1: Abbey Mills	Any proposals for this site must deliver improvements to sustainable and active travel, including access to/from West Ham and Abbey Mills stations and improvements within either or both stations. Significant improvements for people walking and cycling will be needed to link this site with the surrounding area, including across the River Lea into Tower Hamlets. The suggested bridge link to West Ham station should not have a direct entrance into the station as this would require an additional ticket hall.	<p>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.'</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>To ensure that potential future options for increased capacity at West Ham station can be accommodated an additional requirement should be added as follows: '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.'</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>
N7.SA2: Parcel Force/Twelvetrees Park and former Bromley by Bow gasworks	Development is currently underway on this site under an extant consent. This includes access for bus services and the delivery of the new western entrance to West Ham station. Any additional/revised proposals for this site must ensure that these improvements are realised alongside the significant improvements for people walking and cycling that link the site with the surrounding area (including across the River Lea into Tower Hamlets). The agent of change principle and infrastructure protection measures should be applied to development close to existing rail lines and bus infrastructure, including West Ham bus garage.	<p>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.'</p> <p>We also welcome the following infrastructure requirement although for soundness we recommend the alteration shown in red 'Development should contribute to active and public transport upgrades, including access for bus services, bus standing space as well as access to, and capacity at, West Ham Station.'</p> <p>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.'</p>
N7.SA3: Sugar House Island	Development should improve walking and cycling conditions and the public realm on Stratford High Street through improved frontages.	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

Policy	Regulation 18 response	Regulation 19 updated response
		should improve walking and cycling conditions on the Stratford High Street...'
N8: Stratford and Maryland	<p>Major development in this area needs to be cognisant of its impact on Stratford station, which is already severely congested at peak times and on event days.</p> <p>We support the delivery of capacity enhancements at the rail station. Development proposals in the area should ensure that land is made available and funding is provided towards these enhancements.</p> <p>We support the principle of measures to address severance and improve connections.</p> <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 different.</p> <p>It will be crucial to protect the ability to widen the DLR alignment between Stratford and Bow Church to allow for future double tracking to enhance capacity and frequency on this corridor.</p> <p>Bus infrastructure in the neighbourhood that needs to be protected include the following: Stratford Regional bus station is within site N8.SA2 (and is TfL's busiest bus station). Stratford City and International bus stations are within N8.SA5.</p> <p>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 <u>public transport</u>, walking or cycling routes.'</p> <p>Point 11 should be amended to read 'increasing the capacity of Stratford station and preventing development which would inhibit future station <u>and interchange</u> improvements'</p>	<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>We note that this has been corrected in the N8 Neighbourhood Profile.</p> <p>We welcome inclusion of the following in site N8.SA2 infrastructure requirements: 'Land should be safeguarded for double tracking the DLR route.'</p> <p>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.'</p> <p>We welcome the addition of this wording.</p> <p>We welcome the addition of this wording.</p>

Policy	Regulation 18 response	Regulation 19 updated response
	<p>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.</p> <p>TfL's Interchange Best Practice Guidelines should be followed, particularly for the relationship with the bus station and services.</p>	<p>We note that no changes have been made in response to this point.</p>
N8.SA1: Stratford Central		
N8.SA2: Stratford Station	<p>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 <u>a consolidated bus station and meet TfL's future requirements.</u>'</p> <p>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.'</p> <p>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.'</p> <p>In 'Infrastructure requirements', the following amendment should be made: 'Increased station and interchange capacity through improved circulation, ticket hall and station entrances.'</p>	<p>We welcome the addition of this wording.</p> <p>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.</p> <p>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.'</p> <p>We welcome the change in wording.</p>

Policy	Regulation 18 response	Regulation 19 updated response
	<p>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 <u>their</u> function is re-provided or re-located <u>in line with stakeholders' requirements.</u>'</p>	<p>We welcome the change in wording.</p> <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. 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. 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>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>The entirety of the site within the red line boundary should be considered as having multiple visible and buried rail infrastructure assets.</p> <p>To ensure soundness the following wording should be added as an infrastructure requirement: '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.'</p>

Policy	Regulation 18 response	Regulation 19 updated response
N8.SA3: Greater Carpenters District	<p>It should be clarified that the proposal for Jupp Road Bridge is for a walk bridge rather than a 'primary vehicular route'.</p> <p>In 'Infrastructure requirements' the following should be added: 'Safeguard land for double tracking DLR route.'</p>	<p>We note that key routes and connections are now shown differently on the site allocation maps.</p> <p>We welcome the addition to the infrastructure requirements.</p>
N8.SA4: Stratford High Street Bingo Hall		
N8.SA5: Stratford Town Centre West	<p>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.'</p> <p>In 'Infrastructure requirements' the following should be added: '<u>Retention of bus stations and interchange functions.</u>'</p>	<p>We welcome the amended description of existing uses.</p> <p>We welcome the addition of this wording.</p> <p>We attach plans in appendix 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.</p> <p>To ensure soundness the following wording should be added as an infrastructure requirement: '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.'</p>
N8.SA6: Stratford Waterfront South		
N8.SA7: Rick Roberts Way		
N8.SA8: Bridgewater Road		
N8.SA9: Pudding Mill Lane	<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').</p>	<p>We note that key routes and connections are now shown differently on the site allocations maps.</p>

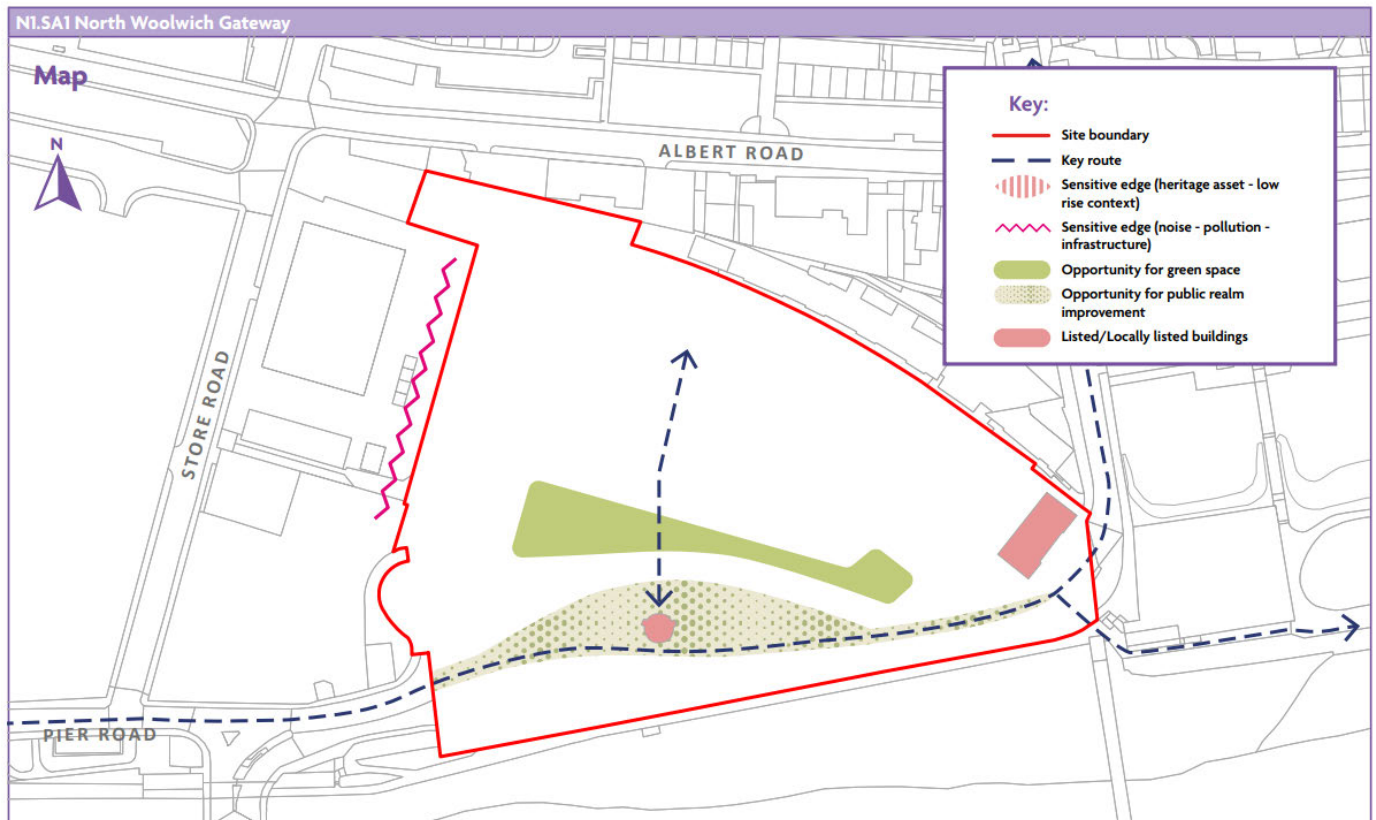
Policy	Regulation 18 response	Regulation 19 updated response
	<p>The final paragraph of 'Infrastructure requirements' includes 'a new pedestrian/cycle connection from Wrexham Road over the A12 and River Lea' and the dotted line alignment shown runs through the Elizabeth line substation. This is not something TfL would support given the access required across Elizabeth line infrastructure.</p>	<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: '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.'</p>
N8.SA10: Chobham Farm North		<p>We attach a plan in appendix 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 as an infrastructure requirement: '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.'</p>
N9: West Ham	See comments on N9.S1: Plaistow North which apply to this wider area.	<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>
N9.SA1: Plaistow North	<p>We welcome the provision of step-free access to Plaistow station as a requirement of this site allocation. This would need to be wholly funded through developer contributions or other funding sources because TfL is not currently able to commit funding.</p>	<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>London Underground have a maintenance access across this site.</p> <p>To ensure soundness the following wording should be added as an infrastructure requirement: 'The potential constraint of</p>

Policy	Regulation 18 response	Regulation 19 updated response
		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.'
N10: Plaistow	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.
N10.SA1: Balaam Leisure Centre		
N10.SA2: Newham 6 th 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.
N10.SA3: Newham Leisure Centre		
N10.SA4: Balaam Street Surgery Complex		
N11: Beckton	<p>We welcome parts 4, 5 and 6 which support redevelopment of East Beckton town centre and the intensification of existing retail and leisure parks where this maximises the benefits of existing and planned transport connectivity and capacity provided by proximity to DLR and bus stations.</p> <p>East Beckton bus station to the south-east of N11.SA1 will need to be protected.</p> <p>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.</p>	<p>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.</p> <p>We note that no change has been made in response to this point.</p>
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 on this site.

Policy	Regulation 18 response	Regulation 19 updated response
N11.SA2: Cyprus	Capacity issues at Cyprus DLR station need to be considered alongside any other improvements necessary to mitigate impacts. Walk and cycle links should be improved, including linkages across rail and road corridors.	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.'
N11.SA3: Royal Docks Road		
N12: East Ham South	<p>White Horse bus stands on Ranccliffe Road junction with High Street South and Newham Town Hall bus stands on Wellington Road will need to be protected.</p> <p>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.</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>We note that no change has been made in response to this point.</p>
N13: East Ham	<p>Ron Leighton Way bus stands on both sides of the highway on west side of N13.SA2 will need to be protected.</p> <p>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.</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>We note that no change has been made in response to this point.</p>
N13.SA1: East Ham Western Gateway		
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.
N13.SA3: Former East Ham Gasworks		
N14: Green Street	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.	We note that there is no mention of development funding for step free access.
N14.SA1: Queen's Market		

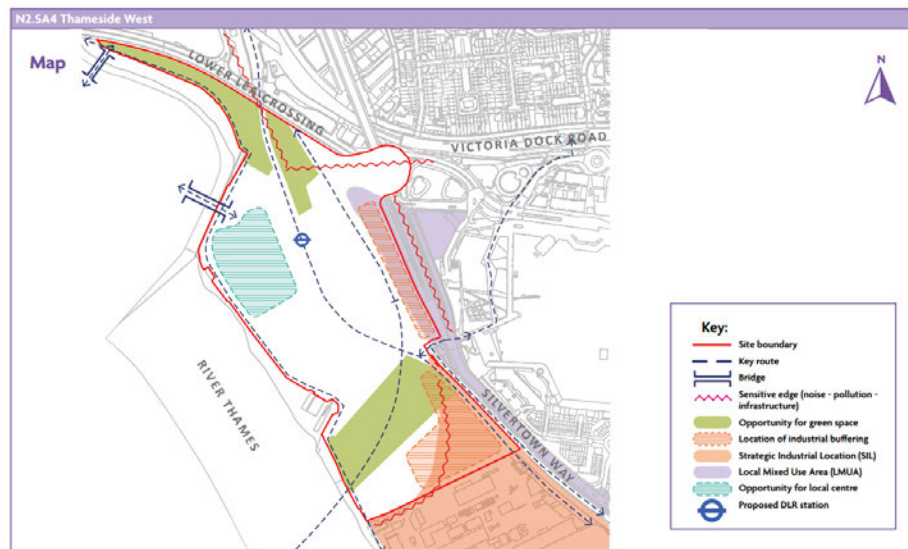
Policy	Regulation 18 response	Regulation 19 updated response
N14.SA2: Shrewsbury Road health complex		
N15: Forest Gate	<p>We welcome support for provision of step-free access at Wanstead Park station, particularly as this offers a short walking route to interchange with the Elizabeth line at Forest Gate. This would need to be wholly funded through developer contributions or other funding sources because TfL is not currently able to commit funding.</p> <p>Wanstead Park station, Woodford Road bus stands on the east of N15.SA1 will need to be protected.</p>	<p>We note that there is no mention of development funding for step free access.</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>
N15.SA1: Lord Lister health centre	Wanstead Park station, Woodford Road bus stands on the east of N15.SA1 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.
N15.SA2: Woodgrange Road West		
N16: Manor Park and Little Ilford	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.

SITE N1.SA1 (North Woolwich Gateway)



Plan 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.)

SITE N2 SA4 (Thameside West)

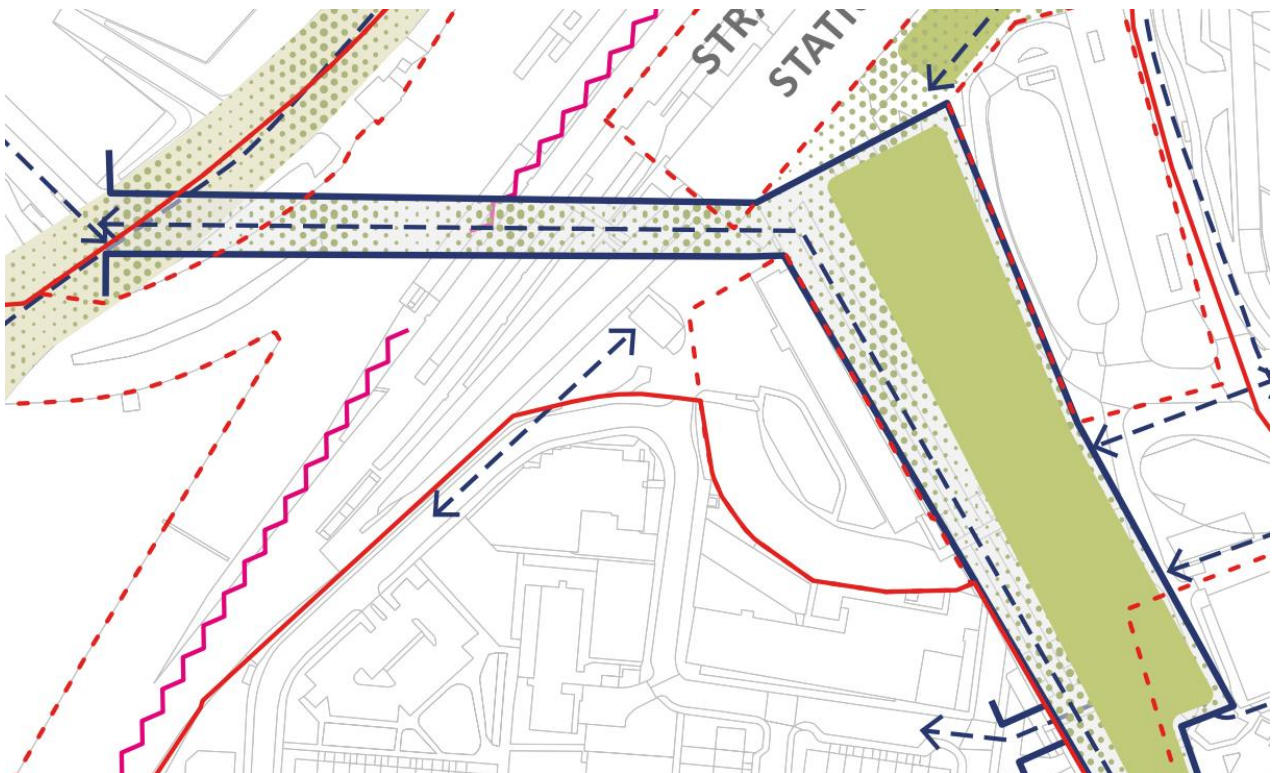
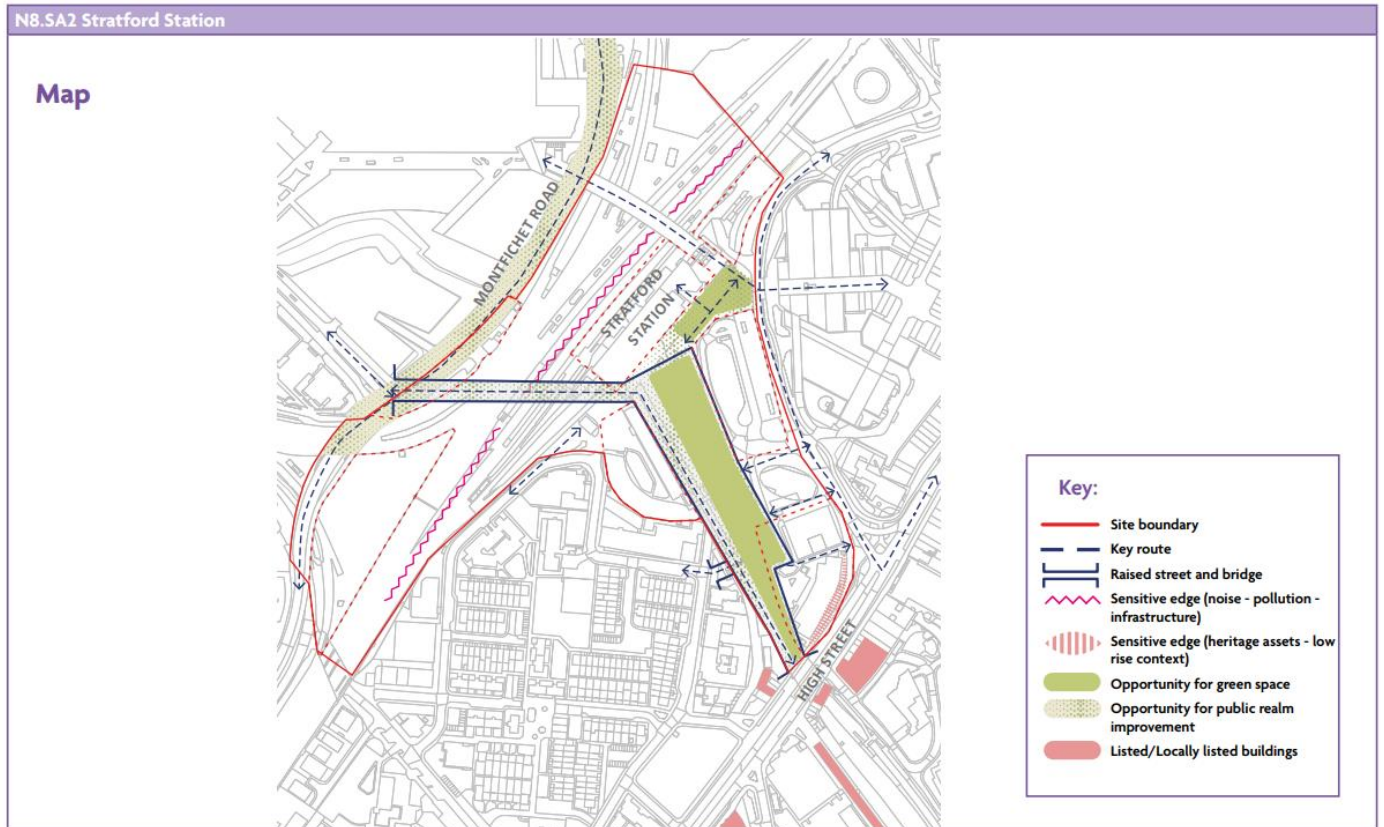


Plans showing approximate locations of LU Jubilee line tunnels under site as red dashed lines, DLR surface lines shaded purple, Cable car air space above site hatched purple and land acquired for Silvertown Tunnel surface works and tunnels shaded green.

N3 SA1 (Royal Albert North) – at west end of site DLR tracks are within the site and Elizabeth line tunnels pass under the site (red hatched).

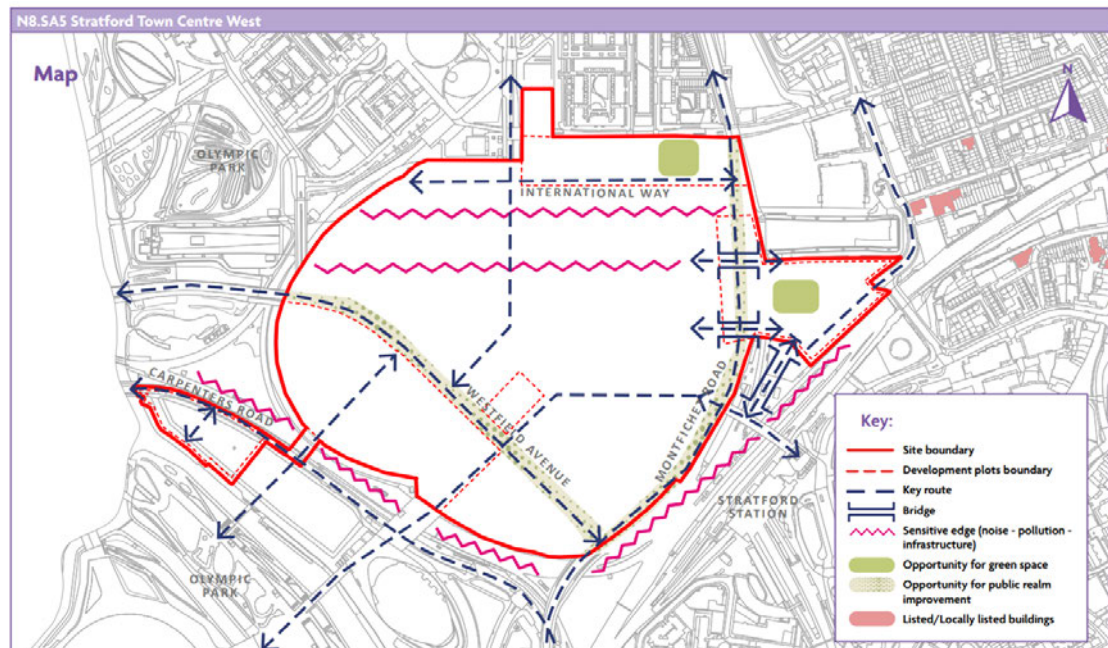


N8 SA2 (Stratford Station)



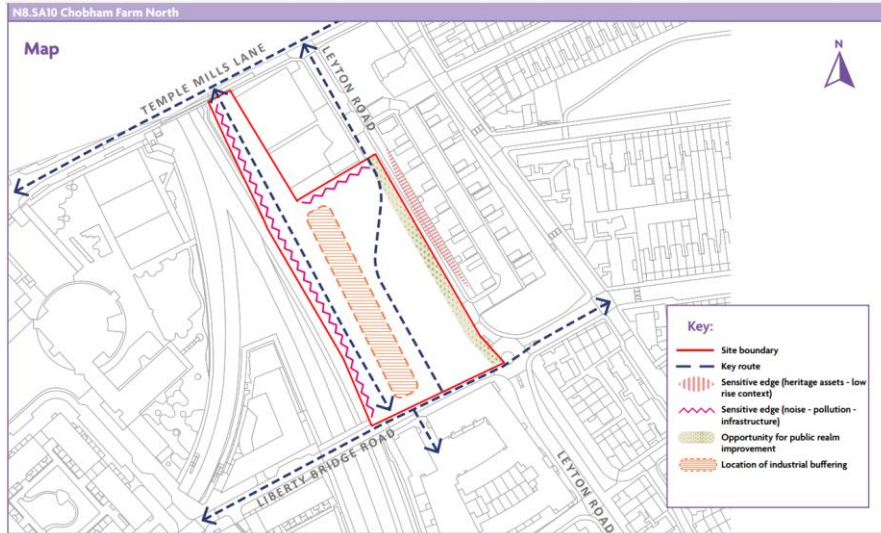
The entirety of the site within the red line boundary should be considered as having multiple visible and buried rail infrastructure assets of the various railway infrastructure managers.

N8 SA5 (Stratford Town Centre West)



Plans 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.

SITE N8 SA10 (Chobham Farm North)



Plan showing approximate location of Central line tunnels in immediate vicinity of and potentially partially under site as red dotted line.