

**Sara Chiong**

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**From:** Matt Eyre <[REDACTED]>  
**Sent:** 19 September 2024 14:38  
**To:** Local Plan  
**Cc:** [REDACTED]  
**Subject:** Draft Submission Local Plan (Regulation 19) Representations on behalf of IQL Office LP  
**Attachments:** LBN Draft Local Plan - Stratford Cross Representations - 19.09.24.pdf  
**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Madam/Sir,

Please find the enclosed representations on the Regulation 19 Local Plan consultation on behalf of IQL Office LP.

These representations mainly relate to policies on heights, residential requirements, employment and energy, as well as Site Allocation N8.SA5 Stratford Town Centre West.

We would appreciate it if you could please confirm receipt via return email.

Please do not hesitate to contact us if you have any queries.

Kind Regards,

Matt



**Matt Eyre**  
**Associate**



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**Our ref:** ME/Q240670  
**Your ref:**  
**Email:** [REDACTED]  
**Date:** 19 September 2024



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

By Email

Dear Madam/Sir

## **London Borough of Newham – Local Plan Review – Draft Submission Local Plan Consultation (Regulation 19) – September 2024**

I write on behalf of IQL Office LP in relation to the London Borough of Newham's (LBN) Submission Draft Local Plan on behalf of the Stratford Cross.

Stratford Cross is located within the Stratford Metropolitan Centre between Westfield Stratford City and the education and culture district of East Bank. It currently sits within the London Legacy Development Corporation (LLDC) local planning authority area, which will hand powers back to LBN on 1<sup>st</sup> December 2024.

Stratford Cross is located within Site Allocation SA3.1: Stratford Town Centre West of the LLDC Local Plan, which will remain the adopted development plan until the new LBN Local Plan is adopted.

Representations were made in February 2023 on the previous LBN Local Plan consultation relating to heights, appropriate commercial land uses in the Stratford Metropolitan Centre and concerns about some of the restrictive housing mix policies. This current consultation has taken on board previous comments on appropriate land uses but not all issues raised about tall building zone boundaries and heights, or restrictive housing mix policies have been fully taken account of and therefore, form the basis of these representations.

### **1 Background to Stratford Cross**

Stratford Cross is located within the Stratford City development. It benefits from the overarching Stratford City Outline Planning Permission (SC OPP) (ref: 10/90641/EXTODA) which permits a substantial amount of commercial floorspace at Stratford Cross.

It is partially built out with three large Grade A offices have been completed and occupied (Building's S5, S6 and S9), with another due for occupation later in 2024. Outline Planning Permission (OPP) was secured for a further office building up to 80m AoD on Plot S10 (ref: 20/00146/OUT) in June 2021, with the subsequently reserved matters application submitted in May 2024 and being determined by the LLDC (ref: 24/00174/REM). A further two office buildings (Plots S2 and S3) remain to come

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forward as reserved matters pursuant to the SC OPP before 17<sup>th</sup> February 2027 within parameters heights up to 110m AoD.

Stratford Cross is a mixed-use development providing a retail, leisure, education and residential uses in addition to commercial uses, comprising a high-density urban development appropriate to the Metropolitan Centre designation, with a cinema in Building S4 and ground floor retail in Buildings S4, S5, S6, S9, S10 and S1/S11. Residential buildings are provided in the south with the occupied Glasshouse Gardens (Plot S7/S8) comprising 333 homes and planning permission granted on Plot S1/S11 in the north of SC in November 2023 for a further 350 homes (ref: 21/00416/FUL) to be built out by London Square.

When complete Stratford Cross has the potential to provide up to 320,000m<sup>2</sup> of commercial (office) floorspace and forms the main strategic office hub in Stratford and a key driver for the local economy and employment in the area. Some of the remaining floorspace to be delivered could also potential be diversified into other appropriate town centre uses.

The challenging office market conditions resulting from the recent changes in the way people work and resulting change in the size and needs of office spaces has meant that Stratford Cross has needed to evolve and diversify from a commercial office district. This has been supported by the success of the emerging university and cultural hub around Stratford led by the development of the University College London East and University of the Arts London campuses around the Queen Elizabeth Olympic Park. These influences have helped achieve diversification of commercial floorspace at Stratford Cross to include the potential for educational floorspace in Buildings S4, S9 and S10 to respond to these factors.

Stratford Cross is a managed estate and therefore has a long-term interest in the creating and sustaining a successful community in the Metropolitan Centre and has been helping support the wider regeneration of the area through the provision of play and amenities for the wider community in the public realm.

Subsequently, our representations are focussed around ensuring the emerging policy is consistent with existing consents across Stratford Cross and the long-term interest in the successful growth of Stratford Metropolitan Centre.

In general, we support the encouragement for a wide range of town centre uses to come forward in Stratford Metropolitan Centre, but our key concerns remain that:

- The proposed Tall Building Zones don't reflect the parameters in the existing planning permissions at Stratford Cross, which are not only inconsistent but will also constrain the ability for growth in a highly accessible location where the Draft Local Plan is focussing growth;



- Affordable housing requirements exceed the London Plan and are shown to be higher than the evidenced viability in the Local Plan Viability Assessment, which will impact on the potential viability and deliverability of schemes that are needed to meet LBN's housing need;
- Housing mixes are not flexible enough to respond to site characteristics; and
- General challenges around the prescriptive nature of policies and requirements for viability assessments if these are not met.

Responses are set out in **Appendix 1**, with supporting plans provided in **Appendix 2** and **3** and the consultation form completed and attached as **Appendix 4**.

Stratford Cross welcomes the opportunity to make representations at this stage of the Local Plan process and look forward to future discussions with the Planning Policy Team on later consultation stages of the Local Plan.

Yours sincerely

Matt Eyre  
Associate

cc.



## Appendix 1 – Stratford Cross Comments on Draft Submission Local Plan Consultation (Regulation 19)

Table 1 - Draft Submission Local Plan Consultation (Regulation 19)

Policy	Representations
<b>BFN1: Spatial strategy</b>	<p>Overall, we support the general approach of the spatial strategy to direct growth to well-connected areas, including Stratford (Part 1) and the principle of making the best use of land and optimising sites but applying a design-led approach.</p> <p>However, this approach is not fully carried through other policies. For example, Tall Building Zones in Stratford and Stratford Cross are set below parameters in existing planning permissions (SC OPP and Plot S10 OPP) in Policy D4, even though these are supported by master planning approaches and townscape and visual impact assessments. This was carried through the LLDC's Characterisation Study prepared in 2019 to support the LLDC Local Plan (July 2020).</p> <p>Further conflicts with the design-led approach are identified with other overly prescriptive housing mix requirements set out in Policy H4 that will restrict the ability for developments to respond to local character and optimise highly-accessible brownfield sites through higher density developments to meet the borough's needs.</p> <p>Stratford Cross is the main commercial office district in Stratford and therefore, the focussing of major office floorspace in the Stratford Metropolitan Centre set out in Part 3 is supported to help establish and strengthen the strategic office hub in Stratford. We also suggest this could be extended to support research and development uses, which would also be appropriate within Stratford Metropolitan Centre, as well as continued support for high-density residential development.</p>
<b>D4 – Tall building</b>	<p>Stratford Cross is covered by three planning permissions informed by an approved sitewide masterplan and height strategy that was subject to multiple Quality Review Panel meetings. This proposes taller buildings along Westfield Avenue and lower buildings along the railway frontage facing East Bank. These were informed by detailed testing including daylight/sunlight, wind microclimate and TVIA. It provides a carefully balanced approach to height that was also been scrutinised by the LLDC's design panel; LLDC design officers and the LLDC planning committee. LBN were also consulted on the proposals, which are now approved.</p>



	<p>There are two proposed Tall Building Zones (TBZ) across Stratford Cross with buildings along Westfield Avenue covered by the 100m TBZ but excluding Glasshouse Gardens (Buildings S7 and S8) the remainder covered under the 60m TBZ.</p> <p>However, our concern is that this approach does not reflect the built and consented height context for Stratford Cross for the following reasons.</p> <p>Building S7 is located along the western end of Westfield Avenue and constructed up to 110m AoD but currently only shown in the 60m TBZ. Accordingly, the 100m TBZ should extend to the western end of the Westfield Avenue frontage to include Building S7.</p> <p>Along the railway boundary, Plot S10 is shown within the 60m TBZ but is subject to a current reserved matters application seeking approval for a building up to 80m AoD (ref: 24/00174/REM) compliant with the OPP (ref: 20/00146/OUT) but would be inconsistent with the future TBZ's. To ensure consistency between the TBZ and the consented S10 development, either the:</p> <ul style="list-style-type: none"><li>▪ Plot should be included within the 100m TBZ;</li><li>▪ A new 80m TBZ should be created and include Plot S10; or</li><li>▪ Further guidance is provided in the Site Allocation N8.SA5 Stratford Town Centre West allowing buildings on Plot S10 to exceed the 60m TBZ where they are consistent with extant consents, or the design is supported through Design Review Panel.</li></ul> <p>A Section of Building S7 is provided in <b>Appendix 2</b>, with the S10 OPP heights parameter plan included in <b>Appendix 3</b>.</p>
<b>J1: Employment and growth</b>	<p>We support the amendment to the policy in Table 10 to state that Office-related research and development (E(g)(ii)) floorspace is acceptable in Stratford Metropolitan Centre.</p> <p>Changes in the commercial office market since the pandemic have seen a change in the way offices are used and a need for flexibility of floorspaces and a wider range of uses instead of large single tenanted offices.</p> <p>Therefore, allowing research and development use will support the growth of employment opportunities in the Metropolitan Centre and opportunities to work with the growing further education hub in the Stratford area.</p>





<b>H1: Meeting Housing Needs</b>	<p>Stratford Cross is a mixed-use district comprising commercial offices, leisure, retail and residential plots in a highly accessible location with a PTAL of 6b.</p> <p>Consequently, we support optimising the residential capacity on highly accessible sites, such as Stratford Cross and considers that this approach should be carried through other policies relating to Housing Mix (Policy H4), affordable housing (Policy H3) and Tall Buildings (Policy D4).</p> <p>Whilst the housing target has increased in the Draft Submission Local Plan, the Regulation 18 Report explains this still falls short of the 2021 London Plan housing targets agreed with the GLA for Newham, including a relevant proportion of the LLDC area.</p> <p>As drafted, the plan is unsound with the London Plan and policies should be supporting increased housing delivery in the borough particularly with greater need for housing set out by the Government in the 2024 National Planning Policy Framework (NPPF) consultation.</p> <p>To meet the housing targets and assessed demand, the Local Plan policies should be less restrictive. This should include allowing buildings to exceed 100m in height where the design quality can be demonstrated, particularly where there are existing buildings or consents exceeding 100m in the area.</p> <p>Housing policies (H3 and H4) should also be less prescriptive and allow sites to be optimised in accessible locations to meet demand.</p> <p>Therefore, flexibility should be introduced to these policies to support optimising housing delivery to meet housing targets on highly accessible sites and to be consistent with draft Local Plan Policy D3 (Design-led site capacity optimisation) and London Plan Policy D3 (Policy D3 Optimising site capacity through the design-led approach).</p>
<b>H3: Affordable Housing</b>	<p>The amendments to the thresholds for viability schemes and tenure mix are significant departures from the London Plan affordable housing policies (H4, H5 and H6) and are therefore unsound.</p> <p>The threshold set out in Part 1 of the policy to provide 60% of all housing units as affordable housing, with 50% of units in social rented tenure is a substantial increase on the 35% affordable housing provision threshold (by habitable room) for the threshold approach in London Plan Policy H5.</p>



	<p>In addition to the targets being unsound, they will result in most housing schemes failing to meet the thresholds and following the viability route, particularly as the majority of housing allocations in the Local Plan are on brownfield sites with high upfront infrastructure costs, such as Stratford Cross.</p> <p>This will result in slower housing delivery against targets and housing need and particular in the context of higher build costs and interest rates.</p> <p>Therefore, the policy should be consistent with the London Plan policies, specifically the 35% threshold approach (London Plan Policy H5) and the tenure mix requirements (London Plan Policy H6).</p> <p>The new proposed 60% target is supported by a Local Plan Viability Study prepared by BNPP. The outputs of their report evidence that the 60% target is not deliverable on the majority of sites, this highlights that the target is too high and is not deliverable. Adopting a higher target than viably evidenced is inconsistent with the NPPG where Paragraph 002 states policy requirements, particularly for affordable housing, should be set at level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable, without the need for a further viability assessment at the decision making stage.</p> <p>It is also considered that the site specific assessments have not been tested enough with key inputs missing or being incorrect e.g. site abnormal costs detailed build costs reflective of high density schemes. The outputs presented by BNPP are therefore not realistic outputs and are artificially inflating the viability of schemes. This further reinforces that the strategic target is not viable or deliverable.</p> <p>It is acknowledged that there is high demand for affordable housing and social housing in the borough. However, meeting this demand will need policies to be sound with the London Plan, allow flexibility in housing mix and to support optimising housing delivery and heights on highly accessible sites, such as those in Stratford Metropolitan Centre.</p>
<b>H4: Housing mix</b>	<p>We support the amendments to the policy to allow up to 5% of units on new developments to be studios of 1bed-1person units.</p> <p>However, we still have concerns that the prescriptive mix set out in Parts 2-5 of the policy do not take account of the need to determine the</p>





	<p>appropriate mix considered individual circumstances of the sites, as set out in Part 1 e.</p> <p>In particular, there are concerns that required mixes do not take account of different needs or characteristics within the borough, with highly accessible areas such as Stratford having a higher demand for smaller units and more constrained sites. This is the reason that the existing targets are rarely met in developments and will result in lower housing and affordable housing delivery.</p> <p>Therefore, we recommend the requirements in Parts 2-5 are proposed as boroughwide targets linked to affordable rented housing provision, where demand for family-sized units is greater.</p> <p>This would allow flexibility for the proposed market mixes to respond to market demand and allow flexibility for proposals respond to local need and site characteristics.</p>
<b>H5: Build to Rent housing</b>	<p>The same concerns are raised on the requirements for 60% affordable housing as Policy H4, which are not sound with the London Plan Policy H5 and impact the viability and deliverability of housing in the borough.</p> <p>The extensive proposed criteria that developers must meet if development is able to qualify as build to rent are very restrictive and unnecessary. Stratford Metropolitan Centre has demonstrated the benefits of the built to rent typology over conventional rented accommodation through the provision of communal spaces and shared amenities under a managed development.</p> <p>Therefore, any necessary restrictions should be controlled through planning obligations, subject to meeting the regulation 122 tests from the CIL Regulations.</p>
<b>H8: Purpose-built student accommodation</b>	<p>We welcome the support for new purpose-built student accommodation in the Stratford and Maryland neighbourhood, which reflects the estimated 10,000 new students studying in the area once the UCL East and UAL campuses are fully open.</p> <p>As with the Policy H3, the affordable student accommodation requirement of 60% of bedrooms is unsound with the 35% in the London Plan (Policy H15) and should be consistent with the London Plan. The policy would then align with Policy H10 of the London Plan which sets targets for affordable rented homes but allows flexibility for other tenures including intermediate and market housing.</p>



	<p>Student need also derived across a London wide basis and set out in the London Plan and therefore, linking nominations to adjacent institutions in Part 4 of the policy would reduce flexibility and be contrary to the London wide need basis of the London Plan and should be removed.</p>
<p><b>Policy H11: Housing Design Quality</b></p>	<p>In general, we support the simplification of requirements however, these still remain highly restrictive and reduce the ability for high-quality design solutions to respond to the local context and including them would further reduce the ability to meet housing need without any improvement in design quality.</p> <p>We therefore recommend that the requirements are further simplified by referring to meeting the adopted Housing Design Standards LPG rather than repeating requirements or adding unnecessarily prescriptive design requirements.</p>
<p><b>CE2: Zero Carbon Development</b></p>	<p>The overall approach to minimising energy is supported. However, the ability for developments to meet the policy aims is severely restricted by the site constraints and by land use and obligations to connect to district heat networks discussed below.</p> <p><b>District Heat Network</b></p> <p>The Stratford Cross development is bound by obligations to connect to the district heat network in Stratford City operated by Equans, which has a decarbonisation plan but not expected to be fully implemented for several years.</p> <p>Whilst the support text in paragraph 3.250 acknowledges that connections to existing heat networks will only be permitted where a decarbonisation plan is implemented, the policy should also allow for this to be taken into account in associated energy and carbon assessments. Otherwise, developments obligated to use district energy networks will artificially perform worse against targets and therefore be financially penalised through contributions without having any control over the decarbonisation.</p> <p><b>Carbon Offsetting Costs</b></p> <p>Carbon offsetting costs are already required under the London Plan Policy SI2 and therefore, viability assessments and financial contributions for schemes that are unable to meet the requirement to generate the equivalent of their own energy needs will further impact the viability of schemes and delivery of affordable housing.</p> <p>Furthermore, if off-setting costs are applied these should be clearly set out and proposed at an affordable level.</p>

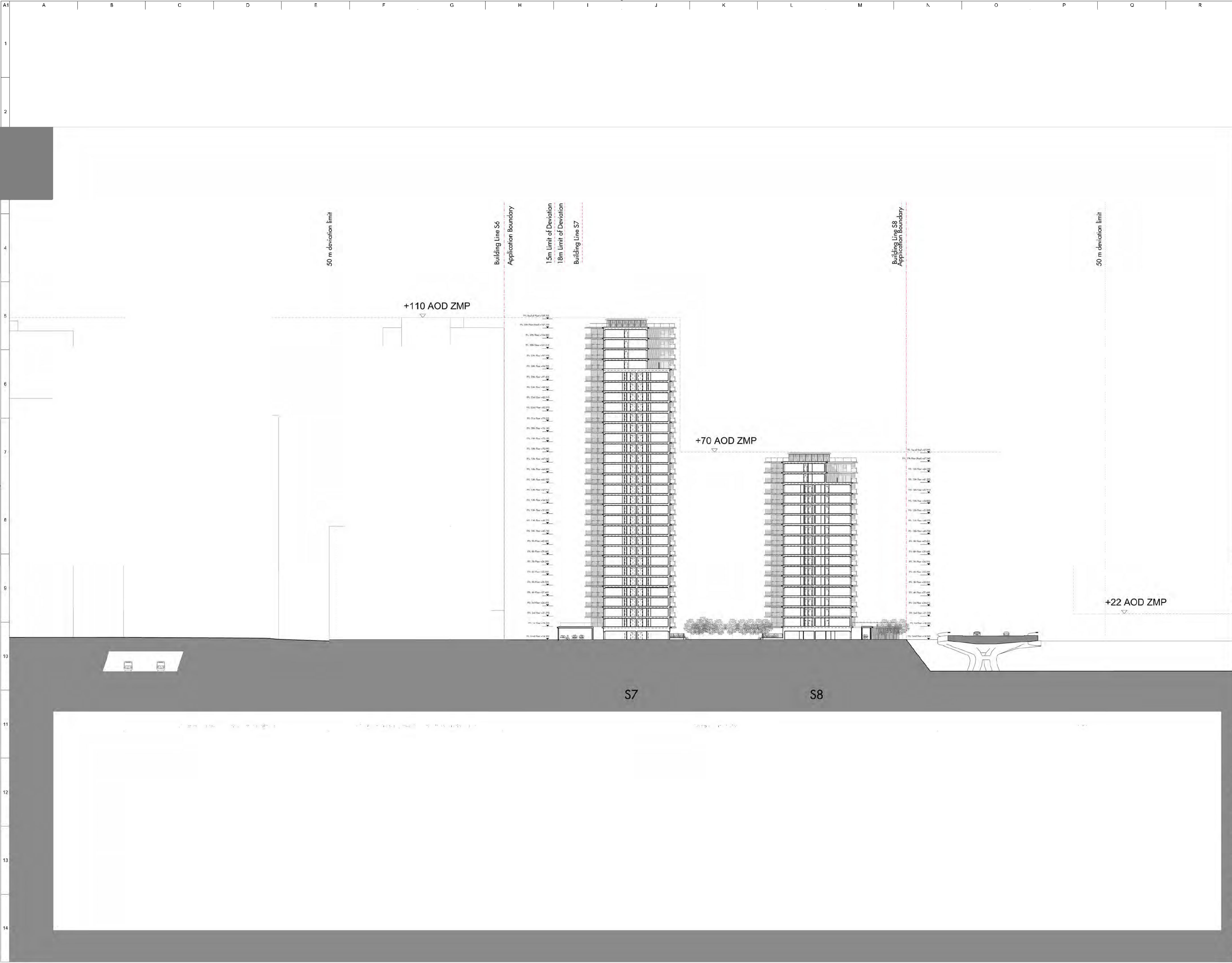


	<p>Accordingly, we recommend that flexibility is applied to the policy so that it does not disproportionately affect high density schemes in accessible locations where roof space is limited for effective renewable energy provision. Additionally, any rate for off-setting costs should be set at an affordable level.</p>
<b>N8.SA5 Stratford Town Centre West</b>	<p>We welcome the reference to appropriate commercial uses in Policy J, which will allow research and development (Class E(g)(ii)) within the Metropolitan Centre and support the general principles of the allocation.</p> <p>We generally support the references to residential, office and other town centre uses at International Quarter South (now Stratford Cross) but encourage the allocation to also reference other appropriate uses, such as leisure and education to support the functions on the centre.</p> <p>However, our main concerns remain about the inconsistency between the existing and consented building heights at Stratford Cross and the proposed TBZ's as explained in our response to Policy D4 in relation to Building S8 and S10.</p>



## Appendix 2 – Stratford Cross Building S7 and S8 Sections





**Notes**

Do not scale from this drawing. Use figured dimensions only. Figured dimensions are in millimetres. All levels are in metres. All dimensions and levels shall be verified on site before proceeding with works. Detailed site survey to be carried out to verify positions and level relationships with site features and ordnance survey. The architect must be notified of any discrepancy.

Where building components are described in the specification as contractor designed, "construction" information relating to those components on this drawing represents design intent only.

NB: All layouts shown are indicative only.

Materials have been annotated only when the floor plans or elevational treatments differ. Floors without material tags have the same elevational treatment as the nearest numbered floor below.

**Legend**

Application Boundary

P2	For reserved matters application - updated drawings	A1	HW	13, 10, 17
P1	For reserved matters application	IV	HW	13, 08, 20

Key Plan

Author

Allies and Morrison

Project Title

Plots S7, S8 and Balcony Park

Drawing Title

South-east Section

Purpose of Issue

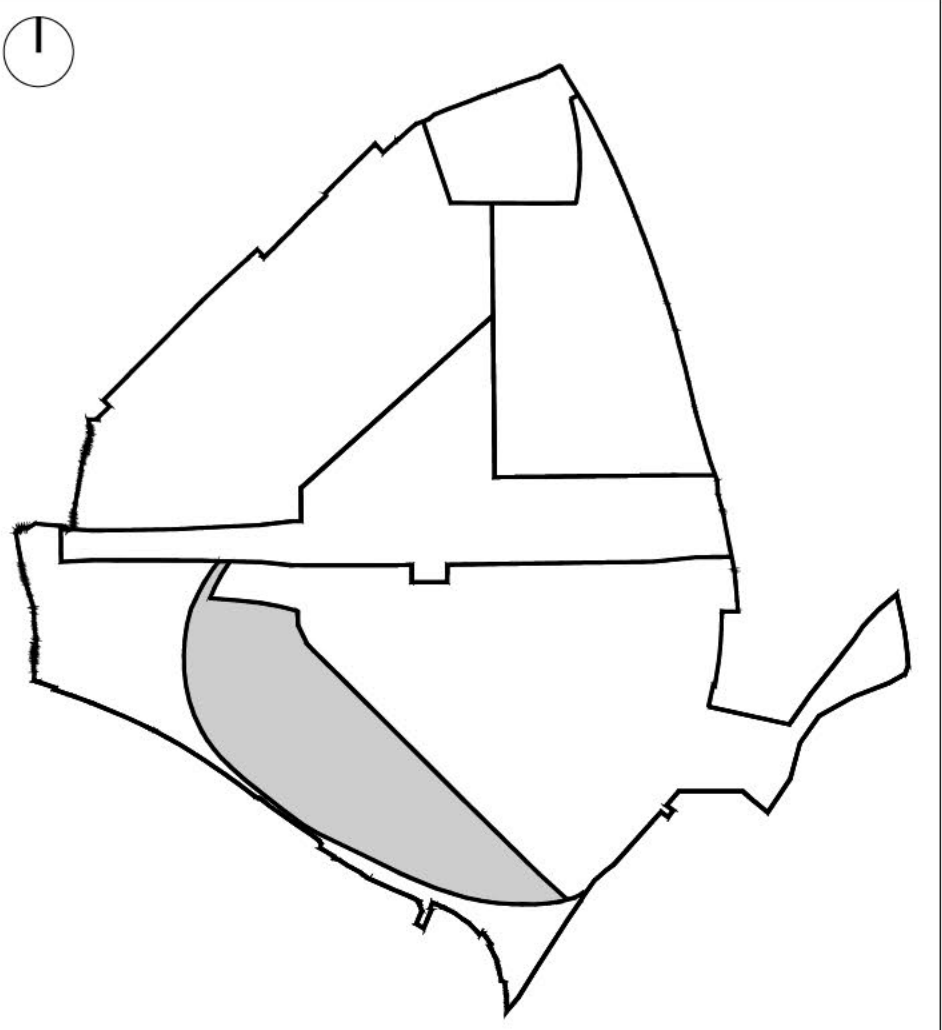
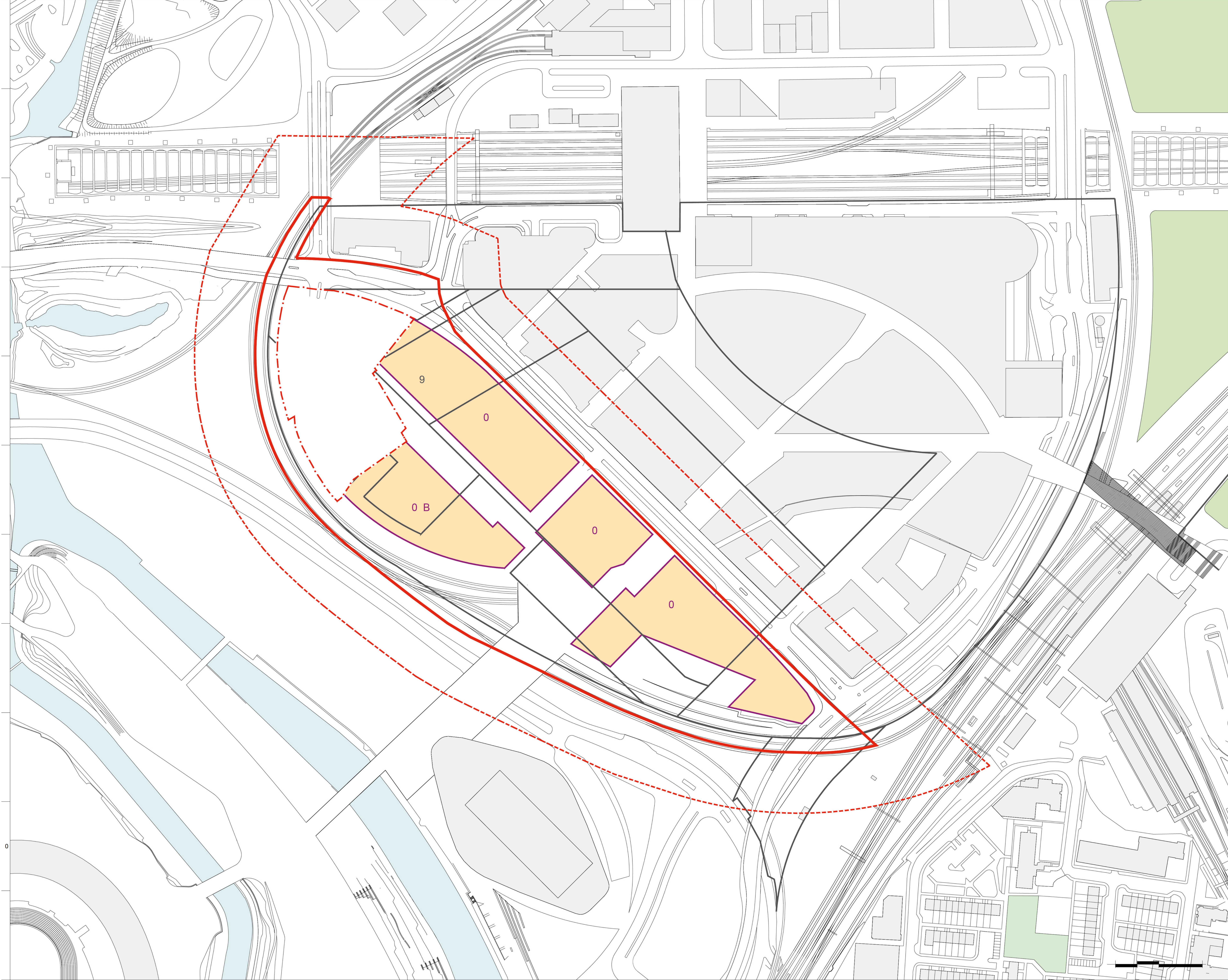
Planning Application

Project Number	Scale
150700	1:500@A1
Drawing No.	Revision
834_07_206	P2



### **Appendix 3 – Plot S10 Outline Planning Permission Maximum Building Heights P01 (IQL-A-MKA-S10-LXX-DR-06-006)**





- B Y
- 0 S Y
- B Y
- V S

F	14.04.2021	RT	AP	AP
D	17.01.2020	BC	BC	SP
C	25.11.2014	BC	ES	MS
B	07.11.2011	EA	ES	EE
A	22.07.2011	EA	EE	EE

DESIGN TEAM:  
MAKOWER ARCHITECTS


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B			S	
	0 @ 0			
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			U	X





## Appendix 4 – Completed Response Form

**Response Form for Regulation 19 Consultation.**

	<p><b>Local Plan</b> Publication Stage Response Form</p>	<p><b>Ref:</b></p> <p><b>(For official use only)</b></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.

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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](mailto:dpo@newham.gov.uk)

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# 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)

*\*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.*

Title	<input type="text"/>	Mr
First Name	<input type="text"/>	Matt
Last Name	<input type="text"/>	Eyre
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	IQL Office LP	Quod
Address Line 1	<input type="text"/>	21 Soho Square
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	1WD 3QP
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text"/>



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## Part B – Please use a separate sheet for each representation

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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.

Please refer to responses in the letter.

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.

Please refer to responses in the letter.

***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, 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:

Provisionally we would like to participate in the hearing sessions based on key policies related to the relevant site allocation but will confirm once the Draft Local Plan has been submitted for examination.

***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 6<sup>th</sup> September 2024**