

High Streets Comments

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Support noted. This policy change has not been made. In agreement with Transport for London, it is considered that the most sustainable location for early phased development is the part of the Beckton Riverside site within easy walking distance of Galleons Reach DLR station. Transformation of the rest of the site, including the transformation of an out of town retail park into an accessible district centre, remains contingent on delivery of the new DLR station and route or similarly transformative (as confirmed by Transport for London public transport intervention). To do otherwise risks entrenching a car-dependent and unsustainable retail location, potentially undermining the delivery of a more sustainable town centre network across the borough and East London. The approach to the management of the retail park is aligned with the London Plan and the recommendations of the Retail and Leisure Study (2022), in seeking to resist further growth of main town centre uses floorspace in an out of centre location. Please see the new wording in site allocation N1.SA1 Development Principles.						HS1.2a				
	Abrdn supports the proposed designation of the new town centre within Policy N1 (Beckton Riverside) as a District Centre. However, any move towards this new centre should appropriately support the protection and ongoing maintenance of the existing shopping park and associated asset management through a phased delivery.										

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	This wording change has been made. Please see the new wording in Policy HS1.						HS1 Town Centre Network	High Street	Reg18-E-050/026	Anchor	Reg18-E-050
	Support noted.					HS1.1	HS1 Town Centre Network	High Street	Reg18-E-077/014	Ballymore Group	Reg18-E-077

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							HS1.3			Ballymore Group	Reg18-E-077
	However Part 3 of the policy is too prescriptive as currently drafted, particularly part (a) which requires the scale of the Local Centre will be of at least 20 units with units between 80sqm and 150sqm GIA each. The requirement for retail needs to be flexible enough to enable it to respond to the acknowledged demand in the area. Restricting the size of units could prevent certain users for which there is a high demand such as NHS centres , supermarkets day nurseries being attracted to the area. As such, we suggest this requirement is amended to require ‘a variety of small to medium unit sizes’, rather than setting out specific floor areas within the policy.						HS1 Town Centre Network	High Street	Reg18-E-077/015		
	This wording change has been made. The policy now provides flexibility in unit sizes, to be primarily of the small size recommended by the Retail and Leisure Study (2022) while also allowing for other uses, for example community uses (defined through policy CF1) to be set up in units larger than 150sqm GIA in Local Centres, if justified by local need. The policy approach relating to the size of food stores has also changed to allow for more flexibility in the type of provision which can be located in Local Centres, recognising the variety of business models for small and medium convenience store operators. Please see the new wording in policy HS1.						Stratford Metropolitan	High Street	Reg18-E-130/092	Hadley Property Group	Reg18-E-130
	Hadley welcomes the recognition of the potential of Stratford Metropolitan Centre to become an International town centre. This is testament to the original aspiration of the London Plan and LLDC to reinvigorate Stratford as a Metropolitan Centre of international importance										
	Support noted.										

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	This policy approach has now changed to clarify that it is intended to direct proposals including floorspace in Main Town Centre Uses (NPPF definition). Please see the new wording in Policy HS1. We've used the access to Main Town Centre Uses clusters criteria to undertake the spatial assessment and designate new protected frontages or future new centres, please see full methodology set out in the Town Centre Network Review Methodology Paper 2022 and its 2024 update. The comment you have provided has not resulted in a change as this policy does not apply to the location of residential proposals. Please see policy D3 Design-led residential site capacity optimisation.			HS1.1			HS1 Town Centre Network	High Street	Reg18-E-106/007	Home Builders Federation	Reg18-E-106

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							HS1.1			Landhold Developments Ltd	Reg18-E-056
	Support noted						HS1 Town Centre Network	High Street	Reg18-E-056/018		
	This policy approach has now changed, to allow for more flexibility in the scale of food store provision that can be located in Local Centres, recognising the variety of business models for small and medium convenience store operators. Please see the new wording in policy HS1.						HS1.3b			Lidl	Reg18-E-012
							HS1 Town Centre Network	High Street	Reg18-E-012/004		

Comment Response		
Comment	use class requires an impact assessment when located in-centre. Replays LLP considers this policy overly restrictive and does not allow for the growth and development of local services to meet the needs of local people.	
Implementation		
Justification		
Clause		HS1.3b
Introduction		
Site allocation		
Policy		HS1 Town Centre Network
Chapter		High Street
Comment Reference		Reg18-E-012/011
Representor		Lidl
Representation Reference		Reg18-E-012

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
							HS1.1			Local Plan Drop-In	Reg18-D-001
	Comment noted. As part of the review of Newham's town centre network, we've designated significantly more frontages of Katherine Road, as 2 new Local Centres and an expanded Neighbourhood Parade. These sections were identified as the most suitable for protection following assessment against policy aspirations for the network and the high street health check criteria set out in the Please see the Town Centre Network Review Methodology Paper 2022. Retail premises within designated areas will be protected, while sections outside of this must continue to follow the nationally set 'town centre first approach', unless it meets exemptions criteria set out in draft policy HS3.							High Street	Reg18-D-001/133		Reg18-D-001
	A Neighbourhood Parade is defined as having a minimum of 5 units in main town centre uses or community facilities, which this section of Katherine Road meets the criteria for. The designation recognises the ongoing role of the Neighbourhood Parade in servicing day-to-day local needs, and forms an important part of the overall offer of the Newham Town Centre Network. A range of policies in this plan will support enhancements in the quality of offer of Neighbourhood Parades, as and when development comes forward.						Katherine Road North NP	High Street	Reg18-D-001/134	Local Plan Drop-In	Reg18-D-001

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Reg18-D-001	Local Plan Drop-In	Reg18-D-001/136	High Street	HS1 Town Centre Network			HS1.1			Katherine Road. Don't want to see shops closed down just to make people shop where the designation is. There are more shops north of the local centre designation - variety of shops that wouldn't have a place on Green Street. Katherine Road is heart of the community. Not going to walk to Green Street	Comment noted. As part of the review of Newham's town centre network, we've designated significantly more frontages of Katherine Road, as 2 new Local Centres and an expanded Neighbourhood Parade. These sections were identified as the most suitable for protection following assessment against policy aspirations for the network and the high street health check criteria set out in the Please see the Town Centre Network Review Methodology Paper 2022. Retail premises within designated areas will be protected, while sections outside of this must continue to follow the nationally set 'town centre first approach', unless it meets exemptions criteria set out in draft policy HS3.
Reg18-D-001	Local Plan Drop-In	Reg18-D-001/169	High Street	HS1 Town Centre Network			HS1.1			15 minute neighbourhood limits access to particular shops only	The idea of 15 minute neighbourhoods used is to ensure that all residents can live within a 15 minute walk of key facilities such as shops, schools, parks and workspaces. This is so that residents do not have to travel so far to reach these essential services. Residents are of course welcome to travel further afield to reach a wider range of facilities. At the moment some parts of our borough are very isolated and do not have easy access to shops and facilities. The Plan aims to change this, through introducing new locations for shops, community facilities and parks and by creating new routes to increase access to existing facilities. You can read more about this concept in the Local Plan (page 299) and the Characterisation Study (page 135).

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	The designation boundary of Stratford Metropolitan has now changed to correct omission of the East Bank site, which is now substantially complete, and as set out in the text of the Town Centre Network Review Methodology Paper 2022. Please see the Town Centre Network Review Methodology Paper Update 2024. The word 'proposed' has also been removed from the Policies Map in relation to all established and emerging centre boundaries, to ensure clarity of policy intention. The boundary of Stratford Metropolitan as set out seeks to: 1) to bringing together the designations currently covered by the LLDC Local Plan (2015) and the Newham Local Plan (2018); 2) Include the East Bank site which is now substantially complete; and 3) clarify the spatial relationship with East Village Local Centre. Existing and not yet completed LLDC Local Plan (2020) site allocations delivering intensification of Stratford town centre as part of its growth towards an International centre scale are retained within the Reg 18 identified boundary. The methodology and reasoning for the boundary as proposed is set out in the Town Centre Network Review Methodology Paper 2022 and its 2024 update, and there is no evidence to demonstrate a change in approach is necessary. Please see the new Policies Map.	It is apparent from a review of the draft Newham Local Plan and the draft accompanying Policies Map that this either changes or removes proposals, sites and designations that are currently in place and captured in the LLDC Local Plan. An example would be the extent of the current Metropolitan Centre designation as shown in the LLDC Local Plan and Policies Map and this being shown as proposed rather than existing. These are individually set out in the appended table of comments, however, it is worth noting that changing or removing existing land use designations and site allocations will have specific consequences for what will and will not be acceptable from a land-use and development point of view with an impact for those with an interest in those sites and locations and how they develop or manage these. Where these have a specific impact on the interests of the LLDC it would be helpful to be able to discuss these further in order to explore whether these changes require amendment or can be supported.		HS1.1			HS1 Town Centre Network	High Street	Reg18-E-052/018	London Legacy Development Corporation	Reg18-E-052

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Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/031	High Street	HS1 Town Centre Network			Stratford Metropolitan			Policy HS1, Newham's town centre network. This does not currently provide support within the policy for the ongoing and future development of Stratford as a Metropolitan Centre and becoming an International Centre. Given the strategic importance of this continued growth and the capacity for it, additional text is sought to highlight this.	This Implementation wording has now changed to provide additional guidance regarding the evolution of Stratford Metropolitan to an International scale as defined by the London Plan. Please see the new wording in Policy HS1 implementation.
Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/032	High Street	HS1 Town Centre Network			Stratford Metropolitan			Policy HS1, Newham's town centre network. The potential for inclusion of the East Bank area with its education and cultural uses within the [metropolitan] centre boundary is also highlighted and sought.	The designation boundary of Stratford Metropolitan has now changed to correct the omission of the East Bank site, which is now substantially complete, and as set out in the text of the Town Centre Network Review Methodology Paper 2022. Please see Town Centre Network Review Methodology Paper Update 2024 for further details.
Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/054	High Street	HS1 Town Centre Network			Stratford Metropolitan			Policies Map. As mentioned above there is also a matter of how the existing designated Metropolitan Centre as designated in the LLDC Local Plan has been shown and its boundaries.	The designation boundary of Stratford Metropolitan has now changed to correct omission of the East Bank site, which is now substantially complete, and as set out in the text of the Town Centre Network Review Methodology Paper 2022. The boundary of Stratford Metropolitan as set out seeks to: 1) to bringing together the designations currently covered by the LLDC Local Plan (2015) and the Newham Local Plan (2018); 2) Include the East Bank site which is now substantially complete; and 3) clarify the spatial relationship with East Village Local Centre. Existing and not yet completed LLDC Local Plan (2020) site

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	allocations delivering intensification of Stratford town centre as part of its growth towards an International centre scale are retained within the Reg 18 identified boundary. The methodology and reasoning for the boundary as proposed is set out in the Town Centre Network Review Methodology Paper 2022 and its 2024 update, and there is no evidence to demonstrate a change in approach is necessary. Please see the new Policies Map.										
	Support noted.	The approach in this policy is generally welcomed with the status and function of the centres identified in the LLDC Local Plan is effectively reflected.					HS1 Town Centre Network	High Street	Reg18-E-052/095	London Legacy Development Corporation	Reg18-E-052
	This Implementation wording has now changed to provide additional guidance regarding the evolution of Stratford Metropolitan to an International scale as defined by the London Plan. Please see the new wording in Policy HS1 implementation.	However, the policy does not include a specific reference to or support of the continued development of Stratford Metropolitan Centre despite the continued significant opportunities and plans for growth and the aspiration for this to become an International Centre. An additional section of the policy should be added to support this further development of commercial, retail and service uses of an appropriate scale.				Stratford Metropolitan	HS1 Town Centre Network	High Street	Reg18-E-052/096	London Legacy Development Corporation	Reg18-E-052

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							Stratford Metropolitan			London Legacy Development Corporation	Reg18-E-052
	The designation boundary of Stratford Metropolitan has now changed to correct omission of the East Bank site, which is now substantially complete, and as set out in the text of the Town Centre Network Review Methodology Paper 2022. Please see the Town Centre Network Review Methodology Paper Update 2024.						Stratford Metropolitan			London Legacy Development Corporation	Reg18-E-052/097
	The designation boundary of Stratford Metropolitan has now changed to correct omission of the East Bank site, which is now substantially complete, and as set out in the text of the Town Centre Network Review Methodology Paper 2022. Please see the Town Centre Network Review Methodology Paper Update 2024 for further details. The word 'proposed' has also been removed from the Policies Map in relation to all established and emerging centre boundaries, to ensure clarity of policy intention. The boundary of Stratford Metropolitan as set out seeks to: 1) to bringing together the designations currently covered by the LLDC Local Plan (2015) and the Newham Local Plan (2018); 2) Include the East Bank site which is now substantially complete; and 3) clarify the spatial relationship with East Village Local Centre. Existing and not yet completed LLDC Local Plan (2020) site allocations delivering intensification of Stratford town centre as part of its growth towards an International centre scale are retained within						Stratford Metropolitan			London Legacy Development Corporation	Reg18-E-052/098

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	the Reg 18 identified boundary. Please see the new Policies Map.										
	A change to the designation boundary of Stratford Metropolitan has not been made as the site referred to is retained within the town centre's boundary.						Stratford Metropolitan			London Legacy Development Corporation	Reg18-E-052
	This change to the designation boundary of Stratford Metropolitan has not been made as the leisure, food store and hotel uses established at 40-52 Celebration Avenue are suitable Local Centre uses, are spatially connected to the public realm of East Village Local Centre, and the change in designation of this land does not impact on the function of Stratford Metropolitan due to the spatial connection between Stratford Metropolitan and East Village. Policy HS8 continues to support hotel uses being located in all centres in the Stratford and Maryland neighbourhood.						Stratford Metropolitan			London Legacy Development Corporation	Reg18-E-052

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							Stratford Metropolitan			London Legacy Development Corporation	Reg18-E-052
	The designation boundary of Stratford Metropolitan has now changed to correct omission of the East Bank site, which is now substantially complete, and as set out in the text of the Town Centre Network Review Methodology Paper 2022. Please see the Town Centre Network Review Methodology Paper Update 2024 and the new Policies Map.						HS1 Town Centre Network	High Street	Reg18-E-052/197		
										London Legacy Development Corporation	Reg18-E-052
	The proposed change to the boundary of East Village Local Centre has been made. Please see the new Policies Map and the Town Centre Network Review Methodology Paper Update 2024.										
										London Legacy Development Corporation	Reg18-E-052
										London Legacy Development Corporation	Reg18-E-052
	This change to the designation boundary of Stratford Metropolitan has not been made as the leisure, food store and hotel uses established at 40-52 Celebration Avenue are suitable Local Centre uses, are spatially connected to the public realm of East Village Local Centre, and the change in designation of this land does not impact on the function of Stratford Metropolitan due to the spatial connection between Stratford Metropolitan and East Village. Policy HS8 continues to support hotel uses being located in all centres in the Stratford and Maryland neighbourhood.										

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		HS1. 1					HS1 Town Centre Network	High Street	Reg18-E-073/025	Notting Hill Genesis	Reg18-E-073
	This policy implementation approach has now changed to clarify that the main town centre uses are directed to both town centres and local centres, with both types of centres meeting the NPPF 'town centre' definition. In the context of the London Plan providing a spatial hierarchy and more nuanced definitions, the Local Plan maintains this consistency by referring to centres functioning at district level and above as town centres, and centres that service more localised Newham catchments as local centres. Please see the new wording in Policy HS1, Justification and the Implementation sections.	<p>[Appendix D] Policy HS1 Newham's Town Centres Network Page 88 Proposed Suggested Amendments:</p> <p>Reason / Comment There needs to be clarification of a local centre vs a town centre as current definitions are unclear and inconsistent – we suggest that LBN should follow NPPF definitions.</p>									
	The Local Plan addresses this topic of quality public realm in Local Centres, in broad terms, through policy HS2, and in the case of Church Street through Neighbourhood policy N10. However, it cannot deliver the change you have requested. Our colleagues in Regeneration department may be able to help. We have also provided them with your comments.	<p>"Church Street / Triangle square could become a very attractive center, thanks to its location serving the area South-West of West Ham park and being part of an Area of Townscape value. However, it is very unwelcoming today, with a hideous parking lot, bins (+litter) everywhere and disused newspaper stand. It also has no greenery, not delineation with the main road passing south. Some improvements on those, such as : greening the area, moving the bins to a better location, making that part of Church Street a pedestrian area, could make a huge different to the neighbourhood and shops there" [A:2]</p>									

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	Support noted.						HS1 Town Centre Network	High Street	Reg18-T-002/051	Resident	Reg18-T-002
	Comment noted. The Local Plan addresses this topic through design principles and waste management policies that should help provide environments that people want to take care of and it is easy to appropriately dispose of waste. However, it cannot deliver the change you have requested. There are a number of different programs in place to reduce fly tipping on the Borough. Community Safety team work in partnership with Cleansing, Waste and Recycling, Housing, Private Rented Service, Greenspace, Neighbourhoods and Planning to tackle fly tipping and littering. Community Safety Enforcement Officers are authorised to investigate and enforce against all illegal waste dumping. Fixed penalty notices and prosecutions are used to address fly tipping and littering. Our colleagues in Community Safety Enforcement department may be able to help. We have also provided them with your comments.						HS1 Town Centre Network	High Street	Reg18-T-018/008	Resident	Reg18-T-018

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Reg18-T-057	Resident	Reg18-T-057/018	High Street	HS1 Town Centre Network						[Add to it] ?	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan, which addresses designations within Newham's Town Centres Network in line with NPPF requirements. No changes have been made.
Reg18-T-072	Resident	Reg18-T-072/011	High Street	HS1 Town Centre Network						[Add to it] Ensure all are properly integrated and connected for easy use of locals and visitors.	This wording change has not been made. We did not consider this change to be necessary as accessibility and connectivity are addressed through policies HS2 and HS5, as well as policies in the Transport chapter of the Plan.
Reg18-T-106	Resident	Reg18-T-106/001	High Street	HS1 Town Centre Network						[Add to it] In addition to the ones mentioned in the plan, there is a decent local shop parade on Portway at the level of Amity Road (E15 3QJ), which deserved to be mentioned and could be further expanded as there is a need in the area. [originally submitted in response to HS2]	This new designation has been made, alongside protection of further frontages on Plashet Road to the east. These new designations help complete gaps in the network around West Ham Neighbourhood. The Town Centre Network Review Methodology Paper Update 2024 sets out in further detail the assessment made. Please see the new wording in policy HS1 and designated boundaries on the Policies Map.

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Reg18-T-126	Resident	Reg18-T-126/003	High Street	HS1 Town Centre Network						[Keep it]	Support noted.
Reg18-E-092	Royal Docks	Reg18-E-092/019	High Street	HS1 Town Centre Network			HS1.1			High Streets The Royal Docks will see extensive redevelopment in the coming years and has already seen large scale population change. The Plan currently proposes to support further population change without providing the Royal Docks with a formal Town Centre designation. Instead this relies upon a series of smaller local centres to provide the appropriate mix of uses and functions. This may undermine the ability to deliver 15minute neighbourhoods.	Comment noted. The scale and location of the designations in the Royal Docks is supported by evidence in the Retail and Leisure Study. No additional evidence has been submitted or is available to demonstrate that there is a need for main town centre uses concentration at the scale of a District Centre to service the area's growth. Further, the range of designations meet the policy criteria for choice of destination within 15min walking distance.
Reg18-E-092	Royal Docks	Reg18-E-092/020	High Street	HS1 Town Centre Network			HS1.3			Ensuring high streets are viable and vibrant is critical if the new and existing communities in the Royal Docks are to be sustainable and function properly. The allocation of floorspace and designations between the different types of centres needs to be flexible and to respond to the needs of each neighbourhood and community – and these needs may not always be the same.	A change to this policy approach has not been made. We did not consider this change to be appropriate as the designations for the Royal Docks are in line with evidence available through the Retail and Leisure Study (2022). The policy allows for flexibility of the boundaries set out on the Policies Map, through masterplanning processes, in order to respond to local needs.

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							HS1.3			Royal Docks	Reg18-E-092/021
	This wording change has been made. The policy now provides flexibility in unit sizes, to be primarily of the small size recommended by the Retail and Leisure Study (2022) while also allowing for other uses, for example community uses (defined through policy CF1) to be set up in units larger than 150sqm GIA in Local Centres, if justified by local need. The policy approach relating to the size of food stores has also changed to allow for more flexibility in the type of provision which can be located in Local Centres, recognising the variety of business models for small and medium convenience store operators. Please see the new wording in policy HS1.						HS1 Town Centre Network	High Street			
							HS1.1			Rt Hon Sir Stephen Timms MP	Reg18-E-017/005
	Support noted. As part of the review of Newham's town centre network, we've designated significantly more frontages of Katherine Road, as 2 new Local Centres and an expanded Neighbourhood Parade. These sections were identified as the most suitable for protection following assessment against policy aspirations for the network and the high street health check criteria set out in the Town Centre Network Review Methodology Paper 2022. Retail premises within designated areas will be protected, while sections outside of this must continue to follow the nationally set 'town centre first approach', unless it meets exemptions criteria set out in draft policy HS3.						HS1 Town Centre Network	High Street			

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							HS1.1			Sainsbury's Supermarkets Ltd	Reg18-E-110
	Comment noted. The policy target is already achieved in much of the borough, and sets out an aspiration for all neighbourhoods in the borough to achieve this level of access and choice. Please see revised Town Centre Network Review Methodology Paper Update 2024.						HS1 Town Centre Network	High Street	Reg18-E-110/004		
										Sainsbury's Supermarkets Ltd	Reg18-E-110
	A change to this policy approach has not been made. We did not consider this change to be appropriate as the policy designates town centres and their frontages as required by the NPPF (2023) and London Plan (2021), and in response to the Retail and Leisure Study evidence base. All designations play an important role in servicing local communities due to their location. Policy HS2 addresses how Town and Local Centres in Newham will be managed to maintain and promote their vitality and viability, including reducing risks associated with long term vacancies.						HS1 Town Centre Network	High Street	Reg18-E-110/005		

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Reg18-E-110	Sainsbury's Supermarkets Ltd	Reg18-E-110/006	High Street	HS1 Town Centre Network			HS1.4			Part 4 of Policy HS1 refers to restricting the size of units within parades so that they remain small in scale (80-150sqm) and in Class E use. Larger units (300sqm+) would be required to pass a Retail Impact test. If the Council want to support small parades, they should reduce restrictions and burdens on bricks and mortar retailers not add to them. The reality is that many people are ordering shopping (and take away meals) online and having them delivered. Online retailers do not face such restrictions. By introducing more restrictions, the Council is making it even harder for bricks and mortar retailers to compete against online competitors.	A change to this policy approach has not been made. We did not consider this change to be appropriate as it is in line with the National Planning Policy Framework (2023) requirement for impact assessment outside of town centres (in Newham, these are local centres and town centres of a district scale and above) and the Retail and Leisure Study (2022) that also recommends that the threshold should remain at 300sqm GIA in order to protect Newham's Local Centres. Retailers operating an online only model from their sites are also subject to policy requirements such as those set out in Policy HS7 for delivery-led businesses, including 'dark shops'.
Reg18-E-110	Sainsbury's Supermarkets Ltd	Reg18-E-110/007	High Street	HS1 Town Centre Network			HS1.4			Presumably if a successful retailer was in a 150sqm unit and wanted to expand into a vacant 150sqm unit next door. The retailer will have to pay a consultant to write a Retail Impact Assessment. This is an unnecessary burden. The policies should encourage investment, not set out barriers to investment.	A change to this policy approach has not been made. We did not consider this change to be appropriate as it is in line with the National Planning Policy Framework requirement for impact testing outside of town centres (in Newham, these are Local Centres and Town Centres of a London scale) and the Retail and Leisure Study (2022) that also recommends that the threshold should remain at 300sqm GIA in order to protect Newham's Local Centres.

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Reg18-E-110	Sainsbury's Supermarkets Ltd	Reg18-E-110/008	High Street	HS1 Town Centre Network			HS1.3/4			The requirements for Retail Impact Assessments within town/local centres is at odds with the NPPF and the town centre first approach. This proposed requirement will deter businesses from locating in Newham, particularly small businesses. The Use Classes Order was redrafted to help remove the bureaucracy that hampered investment in centres. The use of shops in centres should remain flexible, in accordance with the Use Classes Order amendments made in 2020.	This policy approach has now changed to clarify the intention that the overall scale of new Local Centres and Neighbourhood Parades should be subject to an Impact Test, in order to ensure their scale is aligned with local need rather than a larger offer that may draw trade away from existing Town and Local Centres. Please see the new wording in Policy HS1. The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as the requirements are in line with the NPPF and the recommendations of the Retail and Leisure Study (2022).
Reg18-E-110	Sainsbury's Supermarkets Ltd	Reg18-E-110/009	High Street	HS1 Town Centre Network			HS1.3/4			We object to these onerous requirements which will over burden small businesses with unnecessary restrictions, making it difficult for food retailers who may occupy a unit in excess of 150sqm, even 300sqm+ in size, to provide a wider range of products for customers.	A change to this policy approach has not been made. We did not consider this change to be appropriate as it is in line with the National Planning Policy Framework requirement for impact testing outside of town centres (in Newham, these are Local Centres and Town Centres of a London scale) and the Retail and Leisure Study (2022) that also recommends that the threshold should remain at 300sqm GIA in order to protect Newham's Local Centres.
Reg18-E-110	Sainsbury's Supermarkets Ltd	Reg18-E-110/010	High Street	HS1 Town Centre Network			HS1.3/4			The threshold for Retail Impact Assessments, as set out in Policy HS1, should be increased to (at least) 750sqm (net) so that small supermarkets are not dissuaded from locating within parades due to an overly onerous Retail Impact Assessment threshold.	This policy approach has now changed to clarify the intention that the overall scale of new Local Centres and Neighbourhood Parades should be subject to an Impact Test, in order to ensure their scale is aligned with local need rather than a larger offer that may draw trade away from existing Town and Local Centres. Please see the new wording in Policy HS1. The comment you have provided has not resulted in a change as we did not consider this change

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	to be appropriate as the requirements are in line with the NPPF and the recommendations of the Retail and Leisure Study (2022).										
	Support noted	The Berkeley Group supports Newham's objective of ensuring its town centre network is within walking distance of its residents' homes as well as its approach to ensuring the vitality and vibrancy of its town centres.					HS1 Town Centre Network	High Street	Reg18-E-136/088	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136
	Support noted	Moreover, the identification of new Local Centres to support local shopping provision is encouraged.			HS1.1		HS1 Town Centre Network	High Street	Reg18-E-136/089	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
									Reg18-E-136/090	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136
	Support noted	The Berkeley Group generally supports Newham's approach to manage and support its town centre network, creation of new town centres and directing town centre uses to this network.					HS1 Town Centre Network	High Street			
		HS1.1					HS1 Town Centre Network	High Street	Reg18-E-136/091	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136
	This policy implementation approach has now changed to clarify that the main town centre uses are directed to both town centres and local centres, with both types of centres meeting the NPPF 'town centre' definition. In the context of the London Plan providing a spatial hierarchy and more nuanced definitions, the Local Plan maintains this consistency by referring to centres functioning at district level and above as town centres, and centres that service more localised Newham catchments as local centres. Please see the new wording in Policy HS1, Justification and the Implementation sections.	However, the definition of town centre as written is unclear as it appears to separate local centres and larger town centres. Annex 2: Glossary of the NPPF directs main town centre uses to town centres, including Local Centres. This hierarchy should be clarified and the definition of town centre should include Local Centres, in line with NPPF.					HS1 Town Centre Network	High Street	Reg18-E-136/092	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136
	This wording change has not been made. We did not consider this change to be appropriate as it does not accurately reflect the intention of the policy that units in local centres should primarily be of small scale, unless justified under other sections of the plan. However, the policy has changed to clarify that there is scope for flexibility in the size of units to respond to specific local needs for social infrastructure or small to medium food stores, consistent with	Point 3 part e of draft Policy HS1 states that new and extended Local Centres must comprise at least 20 commercial units. It is considered that flexibility is needed, particularly in the current retail market, to avoid risk of commercial units sitting vacant long-term. The appropriate scale for new Local Centres should be informed by floorspace need and commercial demand, including existing and proposed housing				HS1.3e	HS1 Town Centre Network	High Street			

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	other policies of the Plan. Please see revised wording in Policy HS1.										
	within its catchment. The Berkeley Group proposed amendments to draft policy wording: a. The scale of the Local Centre will <u>should be of circa at least 20 units, subject to floorspace need and commercial demand.</u> The units will be between 80 sqm and 150 sqm GIA each.										
	The Berkeley Group proposed amendments to draft policy wording: Table 3 Town Centres-International, Metropolitan, Major and District Centres						HS1.1	High Street	Reg18-E-136/368	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136
	This wording change has not been made. We did not consider this change to be appropriate as the scales and names of the Newham town centre designations are in line with the London Plan. However, the policy has changed to provide more clarity on the relationship between the NPPF and the London Plan and how this has influenced the Newham designation names. Please see the new wording in Policy HS1, including its Justification and Implementation text.						Stratford Metropolitan	High Street	Reg18-E-124/007a	Stratford East London Partners LLP	Reg18-E-124
	Support noted. The designation boundary of Stratford Metropolitan has now changed to correct omission of the East Bank site, which is now substantially complete, and as set out in the text of the Town Centre Network Review Methodology Paper 2022.										

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-111	The Silvertown Partnership LLP	Reg18-E-111/007	High Street	HS1 Town Centre Network			Silvertown LC			As identified above, TSP support the designation of a Local Centre at Silvertown under proposed Policy HS1 (Newham's Town Centre Network) and the two key functions identified: "meeting local catchment needs for retail, leisure, services and community uses, and servicing visitors to the Excel centre.".	Support noted.
Reg18-E-111	The Silvertown Partnership LLP	Reg18-E-111/008	High Street	HS1 Town Centre Network			Silvertown LC			These requirements [key functions of Silvertown LC] cannot be met if the potential scale and location of the Local Centre are restricted by the Local Centre definition (Draft Policy HS1), Policies Map [...]	A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Centre scale and the location of the designation is supported by evidence in the Retail and Leisure Study (2022) and masterplanning work supporting the Local Plan. However, a change to this future Local Centre extension boundary has been made to reflect the revised design principles of the site allocation, recognising the benefit of designing in the principle of an 'active frontage', high street style, street connecting the new pedestrian bridge landing point through to the DLR station. This will be achieved through the whole vision for the site as set out in allocation, including provision of non-main town centre employment and community uses. The assessment behind the revised boundary is set out in the Town Centre Network Review Methodology Paper Update 2024. Please note the revised boundary on the Policies Map. No additional evidence has been submitted or is available to demonstrate that there is a need for anything other than a Local Centre at the

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	location. The policy allows for the boundary of the Local Centre extension to be flexibly adjusted through masterplanning processes.										
	We did not consider this change to be appropriate as a single integrated Local Centre optimises opportunities of the wider location and makes spatial sense in terms of relationship with travel patterns and proximity of uses. The policy allows flexibility in terms of the character of the offer on either side of the North Woolwich Road. However, the policy approach to describing the role of Silvertown Local Centre in policy HS1 has changed to clarify that any additional functions beyond that of Local Centre, i.e. providing leisure space for Excel visitors, are incidental and should not seek to specifically draw trade to it.			Silvertown LC			HS1 Town Centre Network	High Street	Reg18-E-111/010	The Silvertown Partnership LLP	Reg18-E-111

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	success. It is therefore recommended that the wording is adapted to align to the vision for Silvertown as expressed in the Hybrid Planning Application.										
	A change to this policy spatial approach has not been made. We did not consider this change to be appropriate as a single integrated Local Centre optimises opportunities of the wider location and is logical in terms of relationship with travel patterns and proximity of main town centre uses creating a single cluster. The proposed scale and location of the boundary is based on available information regarding additional retail and leisure need in the area. The policy allows for the boundary of the Local Centre extension to be flexibly adjusted through masterplanning processes, and does not impede a difference in the character of the offer on either side of the North Woolwich Road. However, a change to this boundary has been made to reflect the revised design principles of the site allocation, recognising the benefit of designing in the principle of an active frontage, high street style street connecting the new pedestrian bridge landing point through to the DLR station. This will be achieved through the while vision for the site as set out in allocation, including	The emerging Policies Map identifies the Local Centre as covering a large area including all retail units in the completed Royal Wharf development site and a ‘proposed extension’ within the southern part of the Silvertown development site, covering the western frontage to North Woolwich Road. As the development is yet to be built out, it is not considered appropriate for the location of this Local Centre to be illustrated on a map, which limits opportunities for a design-led approach. The scale appropriate for the Local Centre should be informed by the overall scale of the development, to meet the needs of the new resident, worker and visitor population. Given the significant amount of existing and new housing coming forward in the area, including at the Silvertown there will be a greater demand for new retail floorspace and increase in available expenditure to support both local centres. The new local centre at Silvertown Quays will complement rather than compete with Royal Wharf given		Silvertown LC			HS1 Town Centre Network	High Street	Reg18-E-111/011	The Silvertown Partnership LLP	Reg18-E-111

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	it will serve the new population (circa 13,000 people) to the north of North Woolwich Road, whereas Royal Wharf is already serving a similar population to the south of North Woolwich Road. The scale of development at Silvertown, and dual function to connect to the Excel centre justifies an exception in how the Local Centre will function.										
	provision of non-main town centre employment and community uses. The assessment behind the revised boundary is set out in the Town Centre Network Review Methodology Paper Update 2024. Please note the revised boundary on the Policies Map.										
	Restricting the location almost entirely along the North Woolwich Road frontage does not make best use of placemaking or encourage opportunities to connect to the Excel centre, ensuring alignment with Draft Policy HS1 .						Silvertown LC				
	A change to this policy spatial approach has not been made. We did not consider this change to the Policies Map to be appropriate as a single integrated Local Centre optimises opportunities of the wider location and makes spatial sense in terms of relationship with travel patterns and proximity of main town centre uses creating a single cluster. The proposed scale and location of the boundary is based on available information regarding additional retail and leisure need in the area. The policy allows for the boundary of the Local Centre extension to be flexibly adjusted through masterplanning processes, and does not impede a difference in the character of the offer on either side of the North Woolwich Road. However, a change to this boundary has been made to reflect the revised design principles of the site allocation, recognising the benefit of designing in the principle of an active frontage, high street style street connecting the new pedestrian bridge landing point through to the DLR station. This will be achieved through the whole vision for the site										

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	as set out in allocation, including provision of non-main town centre employment and community uses. The assessment behind the revised boundary is set out in the Town Centre Network Review Methodology Paper Update 2024. Please note the revised boundary on the Policies Map. Further, the policy approach to describing the role of Silvertown Local Centre in policy HS1 has changed to clarify that any provision of leisure space for Excel visitors or visitors to the wider area, are incidental and the Local Centre should not seek to create a destination, in line with the Retail and Leisure Study (2022) recommendations.										
	Comment noted. Planning permission for phase 1 is in the process of being implemented. However, ongoing negotiations on the future of the site, including the shared proposed retail impact assessment for the site which was appended with your comments, demonstrate that changes in economic circumstance are leading to a reconsideration of the quantum, type and location of main town centre uses on site, including as part of the site covered by the reserved matters application. The proposed scale and location of the boundary is based on up-to-date information regarding additional retail and leisure need in the area, alongside need for other uses. The policy allows for the boundary of the Local Centre extension to be flexibly adjusted through masterplanning processes, and does not impede a difference in the character of the offer on either side of the						Silvertown LC			The Silvertown Partnership LLP	Reg18-E-111

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	North Woolwich Road. Your comments have not resulted in a change. However, a change to this boundary has been made to reflect the revised design principles of the site allocation, recognising the benefit of designing in the principle of an active frontage, high street style street connecting the new pedestrian bridge landing point through to the DLR station. This will be achieved through the whole vision for the site as set out in the allocation, including provision of non-main town centre employment and community uses. The assessment behind the revised boundary is set out in the Town Centre Network Review Methodology Paper Update 2024. Please note the revised boundary on the Policies Map. Further, the policy approach to describing the role of Silvertown Local Centre in policy HS1 has changed to clarify that any provision of leisure space for Excel visitors or visitors to the wider area, are incidental and the Local Centre should not seek to create a destination, in line with the Retail and Leisure Study (2022) recommendations.										
	This policy approach has now changed to better clarify the policy requirements and to reflect updated Retail and Leisure Study topic papers evidence base. Please see the new wording in policy HS1 and the implementation section. The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as the principles are high level, based on available best practice						Silvertown LC			The Silvertown Partnership LLP	Reg18-E-111

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	and evidence base, and would not impede detailed masterplanning.										
	Comment noted.						Silvertown LC		Reg18-E-111/015	The Silvertown Partnership LLP	Reg18-E-111

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
							HS1.1			The Silvertown Partnership LLP	Reg18-E-111
	Support noted. The 15minutes neighbourhood concept has been incorporated into the whole Local Plan. In the case of this policy, it has informed the designations within Newham's Town Centres Network. Please see Town Centre Network Review Methodology Paper 2022 and the Town Centre Network Review Methodology Paper Update 2024.							High Street	Reg18-E-111/030		
	We did not consider this change to be appropriate as a single integrated Local Centre optimises opportunities of the wider location and is logical in terms of relationship with travel patterns and proximity of main town centre uses creating a single cluster. The proposed scale and location of the boundary is based on available information regarding additional retail and leisure need in the area. The policy allows for the boundary of the Local Centre extension to be flexibly adjusted through masterplanning processes, and does not impede a difference in the character of the offer on either side of the North Woolwich Road. However, a change to this boundary has been made to reflect the revised design principles of the site allocation, recognising the benefit of designing in the principle of an active frontage, high street style street connecting the new pedestrian bridge landing point through to the DLR station. This will be achieved through the whole vision for the site as set out in allocation, including provision of non-main town centre employment and						HS1.1e			The Silvertown Partnership LLP	Reg18-E-111

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	community uses. The assessment behind the revised boundary is set out in the Town Centre Network Review Methodology Paper Update 2024. Please note the revised boundary on the Policies Map.										
	This policy approach has now changed to clarify the intention that the overall scale of new Local Centres and Neighbourhood Parades should be subject to an Impact Test, in order to ensure their scale is aligned with local need rather than a larger offer that may draw trade away from existing Town and Local Centres. Please see the new wording in Policy HS1. The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as the requirements are in line with the NPPF and the recommendations of the Retail and Leisure Study (2022).						HS1.2/3		Reg18-E-111/032	The Silvertown Partnership LLP	Reg18-E-111
	We did not consider this change to be appropriate as a single integrated Local Centre optimises opportunities of the wider location and is logical in terms of relationship with travel patterns and proximity of main town centre uses creating a single cluster. The proposed scale and location of the boundary is based on available information regarding additional retail and leisure need in the area. The policy allows for the boundary of the Local Centre extension to be flexibly adjusted						Silvertown LC		Reg18-E-111/033	The Silvertown Partnership LLP	Reg18-E-111

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	through masterplanning processes, and does not impede a difference in the character of the offer on either side of the North Woolwich Road. However, a change to this boundary has been made to reflect the revised design principles of the site allocation, recognising the benefit of designing in the principle of an active frontage, high street style street connecting the new pedestrian bridge landing point through to the DLR station. This will be achieved through the whole vision for the site as set out in allocation, including provision of non-main town centre employment and community uses. The assessment behind the revised boundary is set out in the Town Centre Network Review Methodology Paper Update 2024. Please note the revised boundary on the Policies Map.										
	This wording change has been made. The policy now provides flexibility in unit sizes, to be primarily of the small size recommended by the Retail and Leisure Study (2022) while also allowing for other uses, for example community uses (defined through policy CF1) to be set up in units larger than 150sqm GIA in Local Centres, if justified by local need. The policy approach relating to the size of food stores has also changed to allow for more flexibility in the type of provision which can be located in Local Centres, recognising the variety of business models for small and medium convenience store operators. Please see the new wording in policy HS1.			HS1.3			HS1 Town Centre Network	High Street	Reg18-E-111/034	The Silvertown Partnership LLP	Reg18-E-111

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
							HS1.3d			The Silvertown Partnership LLP	Reg18-E-111
	<p>A change to this policy approach has not been made, however additional detail has been added to the implementation section of policy HS2. Our monitoring indicates that a number of recent large scale mixed use developments, including main town centre uses, have remained vacant for extended periods of times, sometimes years following completion - for example, Rathbone Market in Canning Town, and Silvertown/Royal Wharf. It is therefore imperative that the Local Plan process enables proactive management of this issues. The national Impact Test is not effective at testing the feasibility of the quantum and type of uses proposed as it is intended to only manage impact on the wider network. These additional tools help address this gap and are based on case studies showing they are effective at driving proactive management of main town centres uses floorspace. This is all the more important where Newham is seeking to establish completely new centres.</p> <p>The potential benefits of having a meanwhile use approach to managing vacancies, or a Vacancy Prevention Strategy as it is now named in the Reg 19 draft policy, are becoming more established, with positive evidence emerging from the High Streets Task Force and other case studies - please see Topic Paper: Managing Vacancies Through Meanwhile Use Strategies (2024) appended to the Retail and Leisure Study (2022), and resulting amendments to policy HS2 and its implementation criteria for Vacancy</p>								Reg18-E-111/035	High Street	HS1 Town Centre Network

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Prevention Strategies. The effectiveness of having a Marketing Strategy to prompt proactive market research and seeking occupier commitments has been demonstrated through current DM practice. For example, new Local Centre being delivered at Albert Basin (14/00664/OUT) includes a planning obligation for the developer to provide a Commercial Strategy to the Council for approval, which has prompted review of marketing approach following start of second phase of development (22/01505/S106), to support occupation of floorspace once completed. The policy aims to adopt this best practice approach for all developments including 2500 sqm or more of main town centre uses floorspace, and particularly for developments delivering new Local Centres.										
	Comment noted. The importance of masterplanning processes is already highlighted by the policy, as is the importance of integrating existing development and planned further growth.						HS1.3e	High Street	Reg18-E-111/036	The Silvertown Partnership LLP	Reg18-E-111

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Support noted.			HS1.3h			HS1 Town Centre Network	High Street	Reg18-E-111/037	The Silvertown Partnership LLP	Reg18-E-111
	This boundary has now changed to reflect the revised design principles of the site allocation, recognising the benefit of designing in the principle of an active frontage, high street style street connecting the new pedestrian bridge landing point through to the DLR station. This will be achieved through the whole vision for the site as set out in the allocation, including provision of non-main town centre employment and community uses. The assessment behind the revised boundary is set out in the Town Centre Network Review Methodology Paper Update 2024. Please note the revised boundary on the Policies Map. Further, the policy approach to describing the role of Silvertown Local Centre in policy HS1 has changed to clarify that any provision of leisure space for Excel visitors or visitors to the wider area, are incidental and the Local Centre should not seek to create a destination drawing further trade, in line with the Retail and Leisure Study (2022). The comment you have provided has not resulted in a change as we did not consider this			Silvertown LC			HS1 Town Centre Network	High Street	Reg18-E-111/127	The Silvertown Partnership LLP	Reg18-E-111

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference		
	change to be appropriate in the context of the evidence base, as above. The 2019 reserved matters application is in the process of being implemented. However, ongoing negotiations on the future of the site, including the shared proposed retail impact assessment for the site which was appended with your comments, demonstrate that changes in economic circumstance are leading to a reconsideration of the quantum, type and location of main town centre uses on site, including as part of the site covered by the approved reserved matters application. The proposed scale and location of the boundary is based on up-to-date evidence base information regarding additional retail and leisure need in the area, alongside need for other uses. The policy allows for the boundary of the Local Centre extension to be flexibly adjusted through masterplanning processes, and does not impede a difference in the character of the offer on either side of the North Woolwich Road.												
	Comment noted. Planning permission for phase 1 is in the process of being implemented. However, ongoing negotiations on the future of the site, including the shared proposed retail impact assessment for the site which was appended with your comments, demonstrate that changes in economic circumstance are leading to a reconsideration of the quantum, type and location of main town centre uses on site, including as part of the site covered by the approved reserved						Silvertown LC		HS1 Town Centre Network	High Street	Reg18-E-111/128	The Silvertown Partnership LLP	Reg18-E-111

Comment Response	Comment	Implementation	Justification	Clause		Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
<p>matters application. The proposed scale and location of the boundary is based on up-to-date evidence base information regarding additional retail and leisure need in the area, alongside need for other uses. The policy allows for the boundary of the Local Centre extension to be flexibly adjusted through masterplanning processes, and does not impede a difference in the character of the offer on either side of the North Woolwich Road. Your comments have not resulted in a change. However, a change to this boundary has been made to reflect the revised design principles of the site allocation, recognising the benefit of designing in the principle of an active frontage, high street style street connecting the new pedestrian bridge landing point through to the DLR station. This will be achieved through the whole vision for the site as set out in the allocation, including provision of non-main town centre employment and community uses. The assessment behind the revised boundary is set out in the Town Centre Network Review Methodology Paper Update 2024. Please note the revised boundary on the Policies Map. Further, the policy approach to describing the role of Silvertown Local Centre in policy HS1 has changed to clarify that any provision of leisure space for Excel visitors or visitors to the wider area, are incidental and the Local Centre should not seek to create a destination, in line with the Retail and Leisure Study (2022) recommendations.</p>	<p>of being implemented and should therefore be given significant weight and the evidence base revisited.</p>											

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
							Stratford Metropolitan			Unibail- Rodamco- Westfield	Reg18-E-102
	Support noted.							High Street	Reg18-E-102/004		
							HS2.6	HS2 Managing New and Existing Town and Local Centres	Reg18-E-077/016	Ballymore Group	Reg18-E-077
	Support noted.							High Street			
							HS2.6	HS2 Managing New and Existing Town and Local Centres	Reg18-E-077/017	Ballymore Group	Reg18-E-077
	This wording change has not been made. We did not consider this change to be appropriate as focusing solely on uplift of floorspace will substantially limit opportunities to provide a good mix of unit sizes and types within established centres, with an impact on the ability of the Plan to support small local businesses to establish themselves on these high streets. However, the policy has changed in order to reduce the overall quantum of affordable rent small units required to 10% of the floorspace, and to provide further guidance on the implementation of the policy.										

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Please see the new wording in policy HS2 and its implementation text.										
	The Local Plan set out a vision for each town centre as part of the Neighbourhood policies, where there is the evidence to do so. These locally specific policies work with the more generic high street policies to address development in a way that is respectful of and aspirational for the local area while also meeting national requirements and responding to broad trends affecting all high streets. We also work with colleagues in Regeneration who play a more active role in making improvements on high streets. However, the Local Plan cannot provide the approach you have requested. We have also provided our Regeneration colleagues with your comments.	[Change it] Each High Street should be treated in a separate way. [originally submitted in response to HS1]					HS2 Managing New and Existing Town and Local Centres	High Street	Reg18-T-084/014	Business Owner	Reg18-T-084

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		HS2.10					HS2 Managing New and Existing Town and Local Centres	High Street	Reg18-E-133/004	Climate You Change	Reg18-E-133
	Comment noted. However, the Local Plan cannot deliver the change you have requested. Our colleagues in Markets department may be able to help. We have also provided them with your comments.						HS2 Managing New and Existing Town and Local Centres	High Street	Reg18-E-133/005	Climate You Change	Reg18-E-133
	A change to this policy approach has not been made. We did not consider this change to be necessary as the policy already supports drinking water fountains in Town and Local Centres, and in within parks and other open spaces through policy GWS1.					HS2.10	HS2 Managing New and Existing Town and Local Centres	High Street			
	Hadley notes the HS2.6 requirement for developments in town centres providing more than 1,000sqm GIA in Class E floorspace, including re-provision, to deliver at least 20% of this floorspace as small units to be marketed at a discounted rate. Hadley suggests that this amount could be a significant disincentive to development and suggests that the amount is reduced to 10% of Class E retail floorspace only, in line with common practice for affordable workspace.					H2.6	HS2 Managing New and Existing Town and Local Centres	High Street	Reg18-E-130/093	Hadley Property Group	Reg18-E-130
	This wording change has been made. Please see the new wording in policy HS2.										

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		H2.7					HS2 Managing New and Existing Town and Local Centres	High Street	Reg18-E-130/095	Hadley Property Group	Reg18-E-130
	<p>A change to this policy approach has not been made, however additional detail has been added to the implementation section of policy HS2. Our monitoring indicates that a number of recent large scale mixed use developments, including main town centre uses, have remained vacant for extended periods of times, sometimes years following completion - for example, Rathbone Market in Canning Town, and Silvertown/Royal Wharf. It is therefore imperative that the Local Plan process enables proactive management of this issues. The national Impact Test is not effective at testing the feasibility of the quantum and type of uses proposed as it is intended to only manage impact on the wider network. These additional tools help address this gap and are based on case studies showing they are effective at driving proactive management of main town centres uses floorspace. This is all the more important where Newham is seeking to establish completely new centres. The potential benefits of having a meanwhile use approach to managing vacancies, or a Vacancy Prevention Strategy as it is now named in the Reg 19 draft policy, are becoming more established, with positive evidence emerging from the High Streets Task Force and other case studies - please see Topic Paper: Managing Vacancies Through Meanwhile Use Strategies (2024) appended to the Retail and Leisure Study (2022), and resulting amendments to policy HS2 and its</p>	<p>Policy HS2.7 states that developments proposing more than 800sqm GIA in main town centre uses in Town Centres should submit a Meanwhile Use Strategy. The implementation text for HS2.7 states that the strategy should outline how units remaining or falling vacant for long than 3 consecutive months will be: “Marketed for short term lease arrangement, discounted or turnover based rent, and support packages for fit out (including support with utilities)” and “marketed to Newham businesses, e.g. through partnership with local business incubator or start-up programmes, and local community groups and voluntary organisations”. Whilst Hadley is supportive of policy that encourages meanwhile uses on vacant sites, it requests that more flexibility is added within this text to reflect the uncertainties that could cause vacant units due to changes in market demand and the current economic climate. Hadley seeks to ensure that the Meanwhile Use Strategy can be appropriately developed and updated to reflect market conditions to ensure that meanwhile uses can be brought forward.</p>									

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	implementation criteria for Vacancy Prevention Strategies.										
	This wording change has not been made. We did not consider this change to be appropriate as this policy addresses design aspects required for the protection and promotion of vitality and viability of the high street frontages. The scale of development will be determined through the application of Design policies, which include consideration of height in appropriate locations.	Policy HS2 states that residential uses on upper floors as part of the mixed-use development is strongly supported, and should be designed to minimise break-up of commercial frontages and to mitigate amenity impacts. Landhold seeks flexibility in the wording of Policy H2 in relation to new residential uses and building heights within town and local centres.		HS2.5			HS2 Managing New and Existing Town and Local Centres	High Street	Reg18-E-056/019	Landhold Development s Ltd	Reg18-E-056
	The Local Plan addresses the quality and scale of the public realm through policies D2 and HS2, and the Transport chapter policies, prioritising a quality pedestrian environment. However, it cannot deliver the change you have requested as the highways network is managed by the Highways team and under separate legislation. We have also provided them with your comments.	Pedestrianised high streets		HS2.10			HS2 Managing New and Existing Town and Local Centres	High Street	Reg18-D-001/150	Local Plan Drop-In	Reg18-D-001

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>The Local Plan addresses the topic of safety and security through a range of policies, such as requiring developments to have proactively design in safety and security measures (see Policies D1, D2, D5, GWS1), and have Secure by Design accreditation (Policy D1). Planning obligations will also be sought to support physical policing infrastructure where reasonable (Policy D2), to deliver social benefits for Newham's residents (Policies BFN3, BFN4 and J4), and to build capacity in local partnerships addressing high streets safety coordination (Policy HS5). The Local Plan seeks to optimise soft, design-led preventive measures before any security features are implemented, seeking to strike a balance between managing crime risk, creating environments that feel safe, and protecting residential privacy.</p> <p>The Metropolitan Police Service (run by the GLA), is also a consultee for the Local Plan and as part of decisions on major planning applications, and have dedicated designing-out-crime officers who are trained to conduct environmental visual audits to identify methods of making a place less attractive for criminal behaviour. Please also see responses we have provided to their comments on the draft Local Plan.</p> <p>The Council's Community Safety Enforcement department regularly collect and review data around antisocial behaviour and crime in the borough, responding to hotspot locations through targeted and focused operations in</p>	Safety				HS2.10	HS2 Managing New and Existing Town and Local Centres	High Street	Reg18-D-001/151	Local Plan Drop-In	Reg18-D-001

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	conjunction with the Police and others partners. Our colleagues in Community Safety Enforcement department may be able to help. We have also provided them with your comments.										
	Comment noted. This policy addresses the need for space for local businesses through a range of measures including by local businesses in a number of ways, including by supporting multi-use of existing larger units, by requiring the provision of small affordable rent units in larger developments and by supporting temporary activation of empty high street units. However, the policy and implementation text has changed to provide additional detail about the expected approach to vacancy prevention and provision of affordable small business space within town and local centres. Please see the new wording in policy HS2.						HS2 Managing New and Existing Town and Local Centres	High Street	Reg18-E-021/004	Manor Park Pop Up Market	Reg18-E-021
	Comment noted. The Local Plan sets out the vision and principles for change happening in Newham's Town and Local Centres, which will in turn guide the scope of investment coming forward as part of development. We also work with colleagues in Regeneration who play a more active role in making improvements on high streets, including Green Street, East Ham and Forest Gate centres. However, the Local Plan cannot require landlords to bring						HS2 Managing New and Existing Town and Local Centres	High Street	Reg18-E-082/032	Resident	Reg18-E-082

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	development forward. We have also provided our Regeneration colleagues with your comments.										
	The Local Plan addresses this topic through policy HS2, by promoting a diverse retail offer, through policy HS4, by protecting and promoting markets and temporary/pop-up activities, and through policy HS6 that helps promote a healthy food offering in centres. However it cannot deliver the change you have requested as the planning system cannot dictate which businesses take up the units that are created following development.						HS2 Managing New and Existing Town and Local Centres	High Street	Reg18-E-002/026	Resident	Reg18-E-002
	Comment noted. The policies are intended to cumulatively work towards preventing and/or limiting the length of vacancies, by requiring development to be responsive to market conditions and flexible towards local businesses. Further, clarification has been added throughout the Plan to make it clear that active frontages can be delivered without providing retail units at ground floor.						HS2 Managing New and Existing Town and Local Centres	High Street	Reg18-E-098/037	Resident	Reg18-E-098

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	The Local Plan addresses the need for space for local businesses through a range of policies, including by protecting existing markets and supporting new markets being established as part of this policy, HS4. Policy HS2 supports local businesses by requiring the provision of small affordable rent units in larger developments and by supporting temporary activation of empty high street units. However, the Local Plan cannot provide the approach you have requested as it cannot dictate which types of businesses occupy the development, only the broad use class they must operate within. We have also provided our Regeneration colleagues with your comments.				3.52		HS2 Managing New and Existing Town and Local Centres	High Street	Reg18-K-003/008	Resident	Reg18-K-003
	The Local Plan seeks to enhance the quality of the public realm in the borough, including within high streets. However, the Local Plan cannot deliver the change you have requested. The Council take all reports of noise and ASB seriously and will take appropriate steps to abate reported nuisances. There are also a number of different programs in place to reduce fly tipping on the Borough. Community Safety team work in partnership with Cleansing, Waste and Recycling, Housing, Private Rented Service, Greenspace, Neighbourhoods and Planning to tackle fly tipping and littering. Community Safety Enforcement Officers are authorised to investigate and enforce against all illegal waste dumping. Fixed penalty notices and prosecutions are used to address fly tipping and littering. Our colleagues in Community				3.53		HS2 Managing New and Existing Town and Local Centres	High Street	Reg18-K-003/009	Resident	Reg18-K-003

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Safety Enforcement department may be able to help. We have also provided them with your comments.										
	This wording change has not been made. We did not consider this change to be necessary as the policy addresses the need for space for local businesses in a number of ways, including by supporting multi-use of existing larger units, by requiring the provision of small affordable rent units in larger developments and by supporting temporary activation of empty high street units. However, the policy and implementation text has changed to provide additional detail about the expected approach to vacancy prevention and provision of affordable small business space within town and local centres. Please see the new wording in policy HS2.	We need more independent shops, supporting local businesses [A:1]					HS2 Managing New and Existing Town and Local Centres	High Street	Reg18-K-003/010b	Resident	Reg18-K-003

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>The Local Plan addresses Newham's significant need for housing, including temporary and sheltered housing for rough sleepers, policies H2 and H6. Funding from development may also be sought to address specific crime and safety impacts from a development (Policy D2) and to build capacity in local partnerships addressing high streets safety coordination (Policy HS5).</p> <p>However the Local Plan cannot deliver the change you have requested.</p> <p>Separate to the Local Plan, our colleagues in the Adults and Health and Housing directorates in the Council work with residents who are, or are at risk of, rough sleeping or homelessness, including through our Homelessness Prevention and Advice Service (HPAS). Newham also has a published Homelessness and Rough Sleeping Strategy 2021-2026, which sets out an intelligence-led, public health approach to tackling homelessness, and improving access to, and the quality of, housing within the borough. Community Safety Enforcement Officers can where appropriate issue Community Protection Warning Notices/Notices and Fixed Penalty Notices to persistent beggars and buskers. However Officers are required to make necessary referrals to outreach services, such as, Change Grow Live (CGL) and Street Population, for individuals that are vulnerable, rough sleeping or living with addiction.</p>				3.53		HS2 Managing New and Existing Town and Local Centres	High Street	Reg18-K-037/003	Resident	Reg18-K-037

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
							HS2 Managing New and Existing Town and Local Centres	High Street	Reg18-T-002/020	Resident	Reg18-T-002
	The Local Plan addresses the need for space for local businesses through a range of policies, including by protecting existing markets and supporting new markets being established as part of this policy, HS4. Policy HS2 supports local businesses by requiring the provision of small affordable rent units in larger developments and by supporting temporary activation of empty high street units. However, the Local Plan cannot provide the approach you have requested as it cannot dictate which types of businesses occupy the development, only the broad use class they must operate within. We have also provided our Regeneration colleagues with your comments.										
							HS2 Managing New and Existing Town and Local Centres	High Street	Reg18-T-002/024	Resident	Reg18-T-002
	Comment noted. The Local Plan sets out the vision and principles for change happening in Newham's Town and Local Centres, which will in turn guide the scope of investment coming forward as part of development. We also work with colleagues in Regeneration who play a more active role in making improvements on high streets, including East Ham town centre. However, the Local Plan cannot require landlords to bring development forward. We have also provided our Regeneration colleagues with your comments.										

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-002	Resident	Reg18-T-002/032	High Street	HS2 Managing New and Existing Town and Local Centres						[Please provide any comments and feedback on the *Section 2: Vision and Objectives*.] The Local Plan talks about 'new shops' but what kinds of shops will these be and what about the existing shops? Newham needs quality healthy independent eateries, cafes and shops that instil a sense of pride and aspiration like you see everywhere in Wanstead, East Village, Hackney, Waltham Forest.	The Local Plan addresses this topic through policy HS6, by limiting the concentration of hot food takeaways and gambling premises throughout the borough, and by promoting take up of healthy food standards. However, it cannot deliver the change you have requested as the planning system cannot dictate operational models of existing businesses. The Council's Public Health department are aware of the issues of access to quality, nutritious food in the borough and improving this is one of the key priorities of the 50 Steps to a Healthier Newham strategy. We have also shared your comments with the Public health department.
Reg18-T-002	Resident	Reg18-T-002/036	High Street	HS2 Managing New and Existing Town and Local Centres						[Please provide any comments and feedback on the *Section 2: Vision and Objectives*.] A few decades ago High Street North was aspirational with an M&S and quality independent shops where now it is like a slum. Please take bold action fast!	Comment noted. The Local Plan sets out the vision and principles for change happening in Newham's Town and Local Centres, which will in turn guide the scope of investment coming forward as part of development. We also work with colleagues in Regeneration who play a more active role in making improvements on high streets, including East Ham town centre. However, the Local Plan cannot require landlords to bring development forward. We have also provided our Regeneration colleagues with your comments.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
							HS2 Managing New and Existing Town and Local Centres	High Street	Reg18-T-002/052	Resident	Reg18-T-002
	A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan set out a vision for each town centre as part of the Neighbourhood policies, where there is the evidence to do so. These locally specific policies work with the more generic high street policies to address development in a way that is respectful of, and aspirational for, the local area while also meeting national requirements and responding to broad trends affecting all high streets. We also work with colleagues in Regeneration who play a more active role in making improvements on high streets. However, the Local Plan cannot deliver the change you have requested, as the planning system cannot direct what goods or services markets provide. We have also provided our Regeneration and Newham Markets colleagues with your comments.										
							HS2 Managing New and Existing Town and Local Centres	High Street	Reg18-T-002/053	Resident	Reg18-T-002
	A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan addresses this topic through policy HS6, which promotes take-up of healthy food standards. However, the Local Plan cannot apply standards retrospectively to existing development, and the change of use to a grocery shop, restaurant or cafe will often not require planning permission due to a range of uses being covered by the same use class under the legislation.										

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-002	Resident	Reg18-T-002/054	High Street	HS2 Managing New and Existing Town and Local Centres			HS2.10			[Change it] We need [healthy food shops, cafes, restaurants,] more greenery, [quality segregated cycle lanes,] more greenery etc.	A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan addresses this topic through policies HS2 and D2, which promotes use of green infrastructure.
Reg18-T-026	Resident	Reg18-T-026/001	High Street	HS2 Managing New and Existing Town and Local Centres			HS2.10			[Add to it] We need more green spaces. Turn some streets into green spaces as in the next 15 years [originally submitted in response to HS1]	Comment noted. The Local Plan addresses this topic through a range of policies, including policy HS2 which requires the public realm of high streets to be enhanced by development, policy D2 which promotes greening of the public realm across the borough, and the policies of the Green and Water Spaces chapter. The policies work together to help deliver the change you have requested. No additions have been made to policy HS2.
Reg18-T-026	Resident	Reg18-T-026/002	High Street	HS2 Managing New and Existing Town and Local Centres					parking	[Add to it] there will be less and less private car ownership. Therefore less need in car park spaces and less road. Car sharing will develop. [originally submitted in response to HS1]	Comment noted. The Local Plan addresses this topic through the Transport policies, please see new wording in policy T3.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-026	Resident	Reg18-T-026/004	High Street	HS2 Managing New and Existing Town and Local Centres			HS2.10			<p>[Add to it] Romford Road needs to be seriously looked at. It is a eye sore and a tip. Some of businesses are not fit to purpose. Car wash shops used water flooding the pavements. Rubbish not managed. Newham should impose specific guidelines to private pavements owners. They comply with the pre established directives or they sell their pavements or front of house to the council. So that one of the main road to Newham eventually looks presentable and safe.</p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan addresses the topic of quality public realm, including safety, through a range of policies, such as requiring developments to have proactively design in safety measures (see Polices D1, D2, D5), and have Secure by Design accreditation (Policy D1). Planning obligations will also be sought to support physical policing infrastructure (Policy D2) and to build capacity in local partnerships addressing high streets safety coordination (Policy HS5).</p> <p>However the Local Plan cannot deliver the change you have requested.</p> <p>The Council take all reports of ASB seriously and will take appropriate steps to abate reported nuisances. There are also a number of different programs in place to reduce fly tipping on the Borough. Community Safety team work in partnership with Cleansing, Waste and Recycling, Housing, Private Rented Service, Greenspace, Neighbourhoods and Planning to tackle fly tipping and littering. Community Safety Enforcement Officers are authorised to investigate and enforce against all illegal waste dumping. Fixed penalty notices and prosecutions are used to address fly tipping and littering. The Community Safety Enforcement Officers can also, where appropriate, issue Community Protection Warning Notices/Notices and Fixed Penalty Notices to persistent beggars and buskers, or people displaying acts of antisocial behaviour.</p>

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	However, Officers are required to make necessary referrals to outreach services, such as, Change Grow Live (CGL) and Street Population, for individuals that are vulnerable, rough sleeping or living with addiction. Our colleagues in Community Safety Enforcement department may be able to help. We have also provided them with your comments.										
	Comment noted.						HS2 Managing New and Existing Town and Local Centres	High Street	Reg18-T-026/005	Resident	Reg18-T-026
	Comment noted. Policy HS2 protects commercial and community active frontages within Town and Local Centres, recognising their important function as hubs for their communities and important economic assets. Residential development within these areas is only supported where it does not impact on active frontages, so primarily on upper floors. We continue to monitor the impact of permitted development rights, and to date we have not noted an impact on Newham's town centres that would justify introduction of an Article 4 direction.						HS2 Managing New and Existing Town and Local Centres	High Street	Reg18-T-034/003	Resident	Reg18-T-034

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
							HS2.5			Resident	Reg18-T-034
							HS2.5			Resident	Reg18-T-034/010
							HS2.5			Resident	Reg18-T-034/012

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Together with other policies in the High Streets, Design and Homes chapters, the expectation is that development will be of good quality design and materiality, optimising the mix of uses and scale of development to respond to local context and identified needs.										
	A change to this policy approach has not been made. We did not consider this change to be necessary as policy HS2 seeks to support high town and local centres' vitality by supporting investment in the environment of the high street alongside welcoming new residents that will increase spend in the high street. This policy is clear that the introduction of residential units should not impact on the function of the high street, by requiring the retention/re-provision of non-residential frontages, protecting business and community floorspace, and contributing to enhancing the quality of amenity in the public realm. Together with other policies in the High Streets, Design and Homes chapters, the expectation is that development will be of good quality design and materiality, optimising the mix of uses and scale of development to respond to local context and identified needs.					HS2.5	HS2 Managing New and Existing Town and Local Centres	High Street	Reg18-T-034/013	Resident	Reg18-T-034

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
							HS2 Managing New and Existing Town and Local Centres	High Street	Reg18-T-058/003	Resident	Reg18-T-058
	[Please provide any comments and feedback on the *Introduction*.] plus we need affordable shops for local business, council should take some presses and rent it to upcoming entrepreneurs that will help them,										
	This wording change has not been made. We did not consider this change to be necessary as policy HS2 already includes a requirement for the provision of small affordable-rent units in larger developments, and also supports temporary activation of empty high street units. However, the policy and implementation text has changed to provide additional detail about the expected approach to vacancy prevention and provision of affordable small business space within town and local centres. Please see the new wording in policy HS2.										
							HS2 Managing New and Existing Town and Local Centres	High Street	Reg18-T-058/004	Resident	Reg18-T-058
	[Please provide any comments and feedback on the *Introduction*.] [council should take some presses and rent it to upcoming entrepreneurs that will help them,] community centres,										
	This wording change has not been made. We did not consider this change to be necessary as community centres (and community facilities more broadly), are suitable supported with Town and Local Centres, as part of a broader mix of uses. Please see policies HS2 and CF1.										
							HS2 Managing New and Existing Town and Local Centres	High Street	Reg18-T-058/009	Resident	Reg18-T-058
	[Please provide any comments and feedback on *Section 1: All about Newham*.] [...] plus we need affordable shops for local business, council should take some presses and rent it to upcoming entrepreneurs that will help them, [...]										
	This wording change has not been made. We did not consider this change to be necessary as policy HS2 already includes a requirement for the provision of small affordable-rent units in larger developments, and also supports temporary activation of empty high street units. However, the policy and implementation text has changed to provide additional detail about the expected approach to vacancy prevention and provision of affordable small business space within town and local centres. Please see the new wording in policy HS2.										

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
									Reg18-T-058/024	Resident	Reg18-T-058
	This wording change has not been made. We did not consider this change to be necessary as policy HS2 already includes a requirement for the provision of small affordable-rent units in larger developments, and also supports temporary activation of empty high street units. However, the policy and implementation text has changed to provide additional detail about the expected approach to vacancy prevention and provision of affordable small business space within town and local centres. Please see the new wording in policy HS2.						HS2 Managing New and Existing Town and Local Centres	High Street			
	The Local Plan addresses Newham's significant need for housing, including temporary and sheltered housing for rough sleepers, policies H2 and H6. Funding from development may also be sought to address specific crime and safety impacts from a development (Policy D2) and to build capacity in local partnerships addressing high streets safety coordination (Policy HS5). However, the Local Plan cannot deliver the change you have requested. Separate to the Local Plan, our colleagues in the Adults and Health and Housing directorates in the Council work with residents who are, or are at risk of, rough sleeping or homelessness, including through our Homelessness Prevention and Advice Service (HPAS). Newham also has a published Homelessness and Rough Sleeping Strategy 2021-2026, which sets out an intelligence-led, public health approach to tackling homelessness, and improving access to, and	HS2. 10					HS2 Managing New and Existing Town and Local Centres	High Streets	Reg18-T-072/006	Resident	Reg18-T-072

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	the quality of, housing within the borough. Community Safety Enforcement Officers can where appropriate issue Community Protection Warning Notices/Notices and Fixed Penalty Notices to persistent beggars and buskers. However, Officers are required to make necessary referrals to outreach services, such as, Change Grow Live (CGL) and Street Population, for individuals that are vulnerable, rough sleeping or living with addiction.										
	We did not consider this addition to be appropriate as policy HS2 already supports the delivery of an enhanced public realm within high streets, and policy D2 supports delivery of shelter and shade in the public realm more broadly.					HS2.10	HS2 Managing New and Existing Town and Local Centres	High Street	Reg18-T-072/012	Resident	Reg18-T-072
	The Local Plan addresses the topic of safety and security through a range of policies, such as requiring developments to have proactively design in safety and security measures (see Policies D1, D2, D5, GWS1), and have Secure by Design accreditation (Policy D1). Funding from development may also be sought to address specific crime and safety impacts from a development (Policy D2) and to build capacity in local partnerships addressing high streets safety coordination (Policy HS5). The Metropolitan Police Service (run by the GLA), is also a consultee for the Local Plan and as part of decisions on major planning					HS2.10	HS2 Managing New and Existing Town and Local Centres	High Street	Reg18-T-072/013	Resident	Reg18-T-072

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>applications, and have dedicated designing-out-crime officers who are trained to conduct environmental visual audits to identify methods of making a place less attractive for criminal behaviour. Please also see responses we have provided to their comments on the draft Local Plan.</p> <p>However The Local Plan cannot deliver the change you have requested. The Council's Community Safety department regularly collect and review data around ASB in the borough, responding to hotspot locations through targeted and focused operations in conjunction with the Police and others partners. Our colleagues in Community Safety Enforcement department may be able to help. We have also provided them with your comments.</p>										
	Support noted. The policy wording has now changed to clarify the approach, including to highlight how local businesses can be priorities to take up new affordable rent class E units. Please see revised wording in policy HS2 and its implementation section.	[Keep it] Help new businesses open shops [originally submitted in response to HS1]					HS2.6/7	High Street	Reg18-T-086/002	Resident	Reg18-T-086

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-098	Resident	Reg18-T-098/010	High Street	HS2 Managing New and Existing Town and Local Centres						[Add to it] Direct more funding into improving areas that have been neglected; some areas require more substantial improvements, in addition to current cosmetic ones, ie Green Street, Queen's Market	Comment noted. The Local Plan sets out the vision and principles for change happening in Newham's Town and Local Centres, which will in turn guide the scope of investment coming forward as part of development. We also work with colleagues in Regeneration who play a more active role in making improvements on high streets, including Queen's Market. However, the Local Plan cannot require landlords to bring development forward. We have also provided our Regeneration colleagues with your comments.
Reg18-T-105	Resident	Reg18-T-105/005	High Street	HS2 Managing New and Existing Town and Local Centres						[Keep it]	Support noted.
Reg18-T-106	Resident	Reg18-T-106/002	High Street	HS2 Managing New and Existing Town and Local Centres						[Add to it] Additions to eat-in catering places (cafes and restaurants) would make a lot of sense in the West Ham area	This wording change has not been made. We did not consider this change to be necessary as new cafes and restaurants are supported as part of development within the Local Centres in the West Ham area, and across the wider network of town and local centres. However, policy HS3 has changed to include a further sequential test exemption criterion for the location of a cafe within a park.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-110	Sainsbury's Supermarkets Ltd	Reg18-E-110/011	High Street	HS2 Managing New and Existing Town and Local Centres						This policy again introduces unnecessary, unrealistic and onerous requirements for bricks and mortar investors. The Council should be encouraging investment not making investment difficult.	A change to this policy approach has not been made. We did not consider this change to be necessary as the policies are based on the recommendations of the Retail Land Leisure Study (2022), and aligned with the policy requirements set by the NPPF and the London Plan. They provide for sufficient flexibility to address a range of context and support sustainable development which enhances the vitality of viability of our town centres while also managing known and likely impacts of trends and operational processes.
Reg18-E-110	Sainsbury's Supermarkets Ltd	Reg18-E-110/012	High Street	HS2 Managing New and Existing Town and Local Centres			HS2.2			Part 2 of Policy HS2 proposes a 70% requirement for units to function within Use Class E and more specifically Ea (retail) and Eb (restaurants and cafes). Presumably, the Council will seek to prevent a pub, hot food takeaway, or laundrette from opening as they are not in Class E. Part 2a is overly restrictive and no longer consistent with the national approach, which promotes diversity and flexibility of use.	This policy approach has now changed due to additional evidence demonstrating a need for differing targets for Newham's centres, and with regards to protection of ancillary spaces in units to expand protection to all Class E units across a centre. Please see the new wording in policy HS1. The comment you have provided have not resulted in a change as we did not consider this change to be appropriate as the approach is in line with the recommendations of the Retail and Leisure Study (2022), and Class E itself provides broad flexibilities of use.
Reg18-E-110	Sainsbury's Supermarkets Ltd	Reg18-E-110/013	High Street	HS2 Managing New and Existing Town and Local Centres			HS2.6			Part 6 of Policy HS2 refers to development within town and local centres, and requires developments proposing 1,000sqm or more of Use Class E floorspace, including re-provision, to deliver at least 20% as small units for discounted rent secured through conditions or planning obligations. This requirement is not justified or sensible and will make investment unviable. It will give new occupiers an unfair competitive	This policy approach has now changed due to further evidence being commissioned to refine the policy, which has resulted in a reduction in the quantum of affordable small retail floorspace to 10 per cent, and additional implementation guidance. Please see the new wording in policy HS2 and its implementation text. The comment you have provided has not resulted in a change as we did not consider this change to be necessary as no evidence of the

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	assumptions have been submitted, and case studies demonstrate the approach has been successfully applying elsewhere.										
	advantage and is more likely to create vacancies within centres. The market should be left to decide what is an appropriate rent for the retail floorspace and we encourage the Council to support bricks and mortar retailing and remove this requirement from the policy wording.										
	Part 7 of Policy HS2 requires a ‘Meanwhile Use Strategy’ to be submitted for proposals over 800sqm within town and local centres, outlining how vacancies should be managed long term which would be secured through planning obligations. Such a requirement will limit the attractiveness of units within the Borough and restrict the letting of units to long term tenants. It will introduce delays as temporary tenants would need to vacate the unit with adequate notice before a long-term tenant can move in. The requirement will also deter people from developing, or redeveloping, sites in centres which is in contrary to the aim of this policy. We would encourage the Council to remove this requirement as it is in no landlord’s interest to keep units vacant.			HS2.7			HS2 Managing New and Existing Town and Local Centres	High Street	Reg18-E-110/014	Sainsbury's Supermarkets Ltd	Reg18-E-110

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference	
	Vacancy Prevention Strategy as it is now named in the Reg 19 draft policy, are becoming more established, with positive evidence emerging from the High Streets Task Force and other case studies. Where a long-term tenant is secured, the meanwhile use activation is no longer required, and remains as a fall-back strategy for the next time the unit(s) becomes vacant for a longer period. Please see Topic Paper: Managing Vacancies Through Meanwhile Use Strategies (2024) appended to the Retail and Leisure Study (2022), and resulting amendments to policy HS2 and its implementation criteria for Vacancy Prevention Strategies.											
	A change to this policy approach has not been made. We did not consider this change to be appropriate as the effectiveness of having a Marketing Strategy to prompt proactive market research and seeking occupier commitments has been demonstrated through current DM practice. For example, new Local Centre being delivered at Albert Basin (14/00664/OUT) includes a planning obligation for the developer to provide a Commercial Strategy to the Council for approval, which has prompted review of marketing approach following start of second phase of development (22/01505/S106), to support occupation of floorspace once completed. The policy aims to adopt this best practice approach for all developments including 2500 sqm or more of main town centre uses						HS2.8	HS2 Managing New and Existing Town and Local Centres	High Street	Reg18-E-110/015	Sainsbury's Supermarkets Ltd	Reg18-E-110

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	floorspace, and particularly for developments delivering new Local Centres.										
	This policy approach has now changed due to the need to clarify that release criteria of other sections of the Local Plan, such as the Social Infrastructure policies, may also apply. Please see the new wording in policy HS2.	2 b. explains the circumstances when the loss of ground floor units in Use Class E would be justified. Some sport facilities fall within Use Class E therefore any loss of provision should be demonstrated as surplus, replaced or the loss is for an alternative sport facility the benefits of which outweigh the loss for this policy to align with National Policy and, therefore, considered sound. As currently worded, 2. b. would allow the loss of a sport facility for other reasons, namely after a limited marketing exercise or to an alternative Town Centre Use (not a sport use). Sport England recommends that for this policy to be sound sport uses must be clearly excluded from 2.b or Policy HS2 has a specific section about sport facilities.		HS2.2b			HS2 Managing New and Existing Town and Local Centres	High Street	Reg18-E-118/015	Sport England	Reg18-E-118

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
									Reg18-E-136/369	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136
	This wording change has not been made. We did not consider this change to be appropriate as the terminology used is aligned with the London Plan (2021). In the context of the London Plan providing a spatial hierarchy and more nuanced definitions for town centres than the NPPF, the Local Plan maintains this consistency by referring to centres functioning at district level and above as town centres, and centres that service more localised Newham catchments as local centres. The policies of the Local Plan apply differently to different scales in of the network and maintaining the distinction between the London level town centres and the Newham-specific local centres is important for implementation.						HS2 Managing New and Existing Town and Local Centres	High Street			
						HS2.1			Reg18-E-136/370	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136
	This wording change has not been made. We did not consider this change to be appropriate as the terminology used is aligned with the London Plan (2021). In the context of the London Plan providing a spatial hierarchy and more nuanced definitions for town centres than the NPPF, the Local Plan maintains this consistency by referring to centres functioning at district level and above as town centres, and centres that service more localised Newham catchments as local centres. The policies of the Local Plan apply differently to different scales in of the network and maintaining the distinction between the London level town centres and the Newham-specific local centres is important for implementation.						HS2 Managing New and Existing Town and Local Centres	High Street			

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	The wording change has not been made. We did not consider this change to be appropriate as the terminology used is aligned with the London Plan (2021). In the context of the London Plan providing a spatial hierarchy and more nuanced definitions for town centres than the NPPF, the Local Plan maintains this consistency by referring to centres functioning at district level and above as town centres, and centres that service more localised Newham catchments as local centres. The policies of the Local Plan apply differently to different scales in of the network and maintaining the distinction between the London level town centres and the Newham-specific local centres is important for implementation.						HS2.3	High Street	Reg18-E-136/371	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136
	This wording change has not been made. We did not consider this change to be appropriate as the terminology used is aligned with the London Plan (2021). In the context of the London Plan providing a spatial hierarchy and more nuanced definitions for town centres than the NPPF, the Local Plan maintains this consistency by referring to centres functioning at district level and above as town centres, and centres that service more localised Newham catchments as local centres. The policies of the Local Plan apply differently to different scales in of the network and maintaining the distinction between the London level town centres and the Newham-specific local centres is important for implementation.						HS2.4	High Street	Reg18-E-136/372	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
							HS2.5			St William Homes LLP and Berkeley South East London Limited	Reg18-E-136
	The Berkeley Group proposed amendments to draft policy wording: 5. Within Town and Local Centres (existing or new), redevelopment or refurbishment of sites will be supported where it retains and improves the commercial frontage and optimises the use of the site. Residential uses on upper floors as part of the mixed use development is strongly supported, and should be designed to minimise break-up of commercial frontages and to mitigate amenity impacts.						HS2 Managing New and Existing Town and Local Centres	High Street	Reg18-E-136/373		
	This wording change has not been made. We did not consider this change to be appropriate as the terminology used is aligned with the London Plan (2021). In the context of the London Plan providing a spatial hierarchy and more nuanced definitions for town centres than the NPPF, the Local Plan maintains this consistency by referring to centres functioning at district level and above as town centres, and centres that service more localised Newham catchments as local centres. The policies of the Local Plan apply differently to different scales in of the network and maintaining the distinction between the London level town centres and the Newham-specific local centres is important for implementation.										
							HS2.6			St William Homes LLP and Berkeley South East London Limited	Reg18-E-136
	The Berkeley Group proposed amendments to draft policy wording: 6. Within Town and Local Centres (existing or new), developments proposing 1000 sqm GIA or more in Class E (Commercial, Business and Service), including re-provision, should deliver at least 20 per cent of floorspace as small units that will be marketed at discounted or turnover-based rent, which will be secured through conditions and/or planning obligations.						HS2 Managing New and Existing Town and Local Centres	High Street	Reg18-E-136/374		
	This wording change has not been made. We did not consider this change to be appropriate as the terminology used is aligned with the London Plan (2021). In the context of the London Plan providing a spatial hierarchy and more nuanced definitions for town centres than the NPPF, the Local Plan maintains this consistency by referring to centres functioning at district level and above as town centres, and centres that service more localised Newham catchments as local centres. The policies of the Local Plan apply differently to different scales in of the network and maintaining the distinction between the London level town centres and the Newham-specific local centres is important for implementation.										

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
							HS2.7			St William Homes LLP and Berkeley South East London Limited	Reg18-E-136
	The Berkeley Group proposed amendments to draft policy wording: 7. Within Town and Local Centres (existing or new), Applicants proposing 800 sqm or more GIA floorspace in any main town centre uses should submit an effective Meanwhile Use Strategy outlining how vacancies will be managed long term, including provision for affordable or turnover-based rents.						HS2 Managing New and Existing Town and Local Centres	High Street	Reg18-E-136/375		
	This wording change has not been made. We did not consider this change to be appropriate as the terminology used is aligned with the London Plan (2021). In the context of the London Plan providing a spatial hierarchy and more nuanced definitions for town centres than the NPPF, the Local Plan maintains this consistency by referring to centres functioning at district level and above as town centres, and centres that service more localised Newham catchments as local centres. The policies of the Local Plan apply differently to different scales in of the network and maintaining the distinction between the London level town centres and the Newham-specific local centres is important for implementation.										
							HS2.8			St William Homes LLP and Berkeley South East London Limited	Reg18-E-136
	The Berkeley Group proposed amendments to draft policy wording: 8. Within Town and Local Centres (existing or new), applicants proposing 2500 sqm or more GIA floorspace in any main town centre uses should submit an adequately resourced and evidenced Marketing Strategy demonstrating market demand for the type and range of units and uses proposed.						HS2 Managing New and Existing Town and Local Centres	High Street	Reg18-E-136/376		
	This wording change has not been made. We did not consider this change to be appropriate as the terminology used is aligned with the London Plan (2021). In the context of the London Plan providing a spatial hierarchy and more nuanced definitions for town centres than the NPPF, the Local Plan maintains this consistency by referring to centres functioning at district level and above as town centres, and centres that service more localised Newham catchments as local centres. The policies of the Local Plan apply differently to different scales in of the network and maintaining the distinction between the London level town centres and the Newham-specific local centres is important for implementation.										

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
							HS2.9			St William Homes LLP and Berkeley South East London Limited	Reg18-E-136
	The Berkeley Group proposed amendments to draft policy wording: 9. Proposals within Town and Local Centres (existing or new) are encouraged to incorporate new, or enhanced access to existing, well-managed publicly accessible (free) drinking water fountains, toilets and baby changing/nursing facilities.						HS2 Managing New and Existing Town and Local Centres	High Street	Reg18-E-136/377		
	This wording change has not been made. We did not consider this change to be appropriate as the terminology used is aligned with the London Plan (2021). In the context of the London Plan providing a spatial hierarchy and more nuanced definitions for town centres than the NPPF, the Local Plan maintains this consistency by referring to centres functioning at district level and above as town centres, and centres that service more localised Newham catchments as local centres. The policies of the Local Plan apply differently to different scales in of the network and maintaining the distinction between the London level town centres and the Newham-specific local centres is important for implementation.										
							HS2.10			St William Homes LLP and Berkeley South East London Limited	Reg18-E-136
	The Berkeley Group proposed amendments to draft policy wording:10. In line with public realm net gain principles of Policy D2, developments in Town and Local Centres (existing or new) should consider how their proposals help achieve:						HS2 Managing New and Existing Town and Local Centres	High Street	Reg18-E-136/378		
	This wording change has not been made. We did not consider this change to be appropriate as the terminology used is aligned with the London Plan (2021). In the context of the London Plan providing a spatial hierarchy and more nuanced definitions for town centres than the NPPF, the Local Plan maintains this consistency by referring to centres functioning at district level and above as town centres, and centres that service more localised Newham catchments as local centres. The policies of the Local Plan apply differently to different scales in of the network and maintaining the distinction between the London level town centres and the Newham-specific local centres is important for implementation.										

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-111	The Silvertown Partnership LLP	Reg18-E-111/038	High Street	HS2 Managing New and Existing Town and Local Centres			HS2.1			[Appendix A] Part 1: TSP support Part 1 of the policy, which encourages an interrelated network of vibrant, attractive centres that connect and respond to place-specific visions and challenges.	Support noted.
Reg18-E-111	The Silvertown Partnership LLP	Reg18-E-111/039	High Street	HS2 Managing New and Existing Town and Local Centres						[Appendix A] Overall, however, the policy places a number of barriers on Town and Local Centre development and the ability for Centres to adapt and change to reflect demand. This is likely to increase Town/Local Centre vacancies and prevent vibrant Town Centres. Restricting Town Centres and their uses that do not allow for flexibility within centres that can respond to local circumstances or market trends, could impact their ability to support the local economy.	A change to this policy approach has not been made. We did not consider this change to be necessary as the policies are based on the recommendations of the Retail Land Leisure Study (2022), and aligned with the policy requirements set by the NPPF and the London Plan. They provide for sufficient flexibility to address a range of context and support sustainable development which enhances the vitality of viability of our town centres while also managing known and likely impacts of trends and operational processes.
Reg18-E-111	The Silvertown Partnership LLP	Reg18-E-111/040	High Street	HS2 Managing New and Existing Town and Local Centres			HS2.2			[Appendix A] Part 2: TSP support the intention to direct retail towards Primary Shopping Areas	Support noted.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
							HS2.2a			The Silvertown Partnership LLP	Reg18-E-111
	[Appendix A] [...]but consider that the 70% requirement for units to function within Use Class E and more specifically Ea (retail) and Eb (restaurants and cafes) at Part 2(a), is overly restrictive and no longer consistent with the national approach which promotes diversity and flexibility of use.						HS2.2a	High Street	Reg18-E-111/041	The Silvertown Partnership LLP	Reg18-E-111
							HS2.2b			The Silvertown Partnership LLP	Reg18-E-111
	[Appendix A] Similarly, the restrictions on loss of Use Class E within a Primary Shopping Area (Part 2(b)) may inhibit otherwise suitable uses from coming forward and could increase vacancy periods within these areas.						HS2.2b	High Street	Reg18-E-111/042	The Silvertown Partnership LLP	Reg18-E-111
							HS2.6			The Silvertown Partnership LLP	Reg18-E-111
	[Appendix A] Part 6: The objective to encourage the provision of small units within the Town/Local Centre is supported.						HS2.6	High Street	Reg18-E-111/043	The Silvertown Partnership LLP	Reg18-E-111
	Support noted.										

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-111	The Silvertown Partnership LLP	Reg18-E-111/044	High Street	HS2 Managing New and Existing Town and Local Centres			HS2.6			[Appendix A] TSP oppose the requirement for 20% of developments in Local Centres proposing 1,000sqm GIA or more of Class E development to deliver small units marketed at discounted or turnover-based rents. This is likely to impact on the vitality of the scheme, create vacancies and would give a commercial advantage to some occupiers. It is likely to deter Town and Local Centre development/redevelopment from coming forwards.	This policy approach has now changed due to further evidence being commissioned to refine the policy, which has resulted in a reduction in the quantum of affordable small retail floorspace to 10 per cent, and additional implementation guidance. Please see the new wording in policy HS2 and its implementation text. The comment you have provided has not resulted in a change as we did not consider this change to be necessary as no evidence of the assumptions have been submitted, and case studies demonstrate the approach has been successfully applying elsewhere.
Reg18-E-111	The Silvertown Partnership LLP	Reg18-E-111/045	High Street	HS2 Managing New and Existing Town and Local Centres			HS2.7			[Appendix A] Part 7: TSP support the aims to encourage meanwhile uses	Support noted.
Reg18-E-111	The Silvertown Partnership LLP	Reg18-E-111/046	High Street	HS2 Managing New and Existing Town and Local Centres			HS2.7			[Appendix A] [Part 7: TSP support the aims to encourage meanwhile uses] but consider that the proposed requirements for a Meanwhile Use Strategy for all developments over 800sqm adds an additional submission stage burden and is most appropriately dealt with by planning condition, where appropriate. Supporting a flexible approach for Town/Local Centre uses, in line with government aims would help improve the take up of Town/Local	A change to this policy approach has not been made, however additional detail has been added to the implementation section of policy HS2. Our monitoring indicates that a number of recent large scale mixed use developments, including main town centre uses, have remained vacant for extended periods of times, sometimes years following completion - for example, Rathbone Market in Canning Town, and Silvertown/Royal Wharf. It is therefore imperative that the Local Plan

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	process enables proactive management of this issues. The national Impact Test is not effective at testing the feasibility of the quantum and type of uses proposed as it is intended to only manage impact on the wider network. These additional tools help address this gap and are based on case studies showing they are effective at driving proactive management of main town centres uses floorspace. This is all the more important where Newham is seeking to establish completely new centres. The potential benefits of having a meanwhile use approach to managing vacancies, or a Vacancy Prevention Strategy as it is now named in the Reg 19 draft policy, are becoming more established, with positive evidence emerging from the High Streets Task Force and other case studies - please see Topic Paper: Managing Vacancies Through Meanwhile Use Strategies (2024) appended to the Retail and Leisure Study (2022), and resulting amendments to policy HS2 and its implementation criteria for Vacancy Prevention Strategies.	Centre floorspace and reduce vacancy times without placing unnecessary technical burdens at application stage.									
	A change to this policy approach has not been made. We did not consider this change to be appropriate as the effectiveness of having a Marketing Strategy to prompt proactive market research and seeking occupier commitments has been demonstrated through current DM practice. For example, new Local Centre being delivered at Albert Basin (14/00664/OUT) includes a planning obligation for the developer to provide a Commercial	[Appendix A] Part 8: TSP oppose the requirements at that require all developments over 2,500sqm within Town and Local Centres to submit a Marketing Strategy, as it places further barriers to development within Town and Local Centres. The imposition of this, and the other policy requirements within a Town/Local Centre do not support a positive strategy for a 'Town Centre first' approach, creating barriers to		HS2.8			HS2 Managing New and Existing Town and Local Centres	High Street	Reg18-E-111/047	The Silvertown Partnership LLP	Reg18-E-111

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	development that will not result in thriving town centres.										
	Strategy to the Council for approval, which has prompted review of marketing approach following start of second phase of development (22/01505/S106), to support occupation of floorspace once completed. The policy aims to adopt this best practice approach for all developments including 2500 sqm or more of main town centre uses floorspace, and particularly for developments delivering new Local Centres.										
	[Appendix A] Town Centre development at any scale should be supported through policy, to promote the long-term vitality and viability of Town/Local Centres, allowing centres to adapt, grow and diversify, in response to the rapid changes in the retail and leisure industries, in line with paragraph 86 of the NPPF.										
	Comment noted. The policy responds to the requirements of the NPPF (2023) and the London Plan (2021), and the recommendations of the Retail and Leisure Study (2022).										
	[Keep it] Supportive										
	Support noted.										

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
							HS2.5			Unibail-Rodamco-Westfield	Reg18-E-102
	Support noted.						HS2 Managing New and Existing Town and Local Centres	High Street	Reg18-E-102/005		
	This wording change has not been made. We did not consider this change to be appropriate as the Retail and Leisure Study 2022 indicated retail growth need can be accommodated within the Town Centres Network and there is no need to consider additional edge of centre or out of centre sites. The policy directs retail and leisure uses above 300sqm GIA to the Town Centres Network, as recommended by the Retail and Leisure Study and in line with NPPF and London Plan town centre first approach.						HS3 Edge of Centre and Out of Centre	High Street	Reg18-E-012/005	Lidl	Reg18-E-012
	HS3 – Edge-of-Centre and Out-of-Centre retail, restaurants, cafes and services Policy HS3 requires “proposals in Neighbourhood Parades, Edge-of-Centre and Out-of-Centre locations, resulting in 300 sqm GIA or more of new or expanded floorspace in retail (Ea), restaurants or cafes (Eb), will be assessed against the retail and/or leisure impact assessment.” Whilst it is common for a retail impact assessment to be required for out-of-centre locations, given the restrictions mentioned in Policies HS1 and HS2 regarding larger units which can handle a discount foodstore, this is further restrictions to reduce the choice for local shoppers and will encourage local people to shop outside of the Borough. The continuous restrictions for retail led development will result in the harm of the amenity of local people and on established growth residential areas, as such updates to the policy are required to accommodate discount foodstores.						HS3.3				

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
							HS3.2			Resident	Reg18-E-123
	This wording change has been made. Please see the new wording in policy HS3, where the principle of café facilities in parks is supported in principle across all parks in the borough.						HS3 Edge of Centre and Out of Centre	High Street	Reg18-E-123/003		
										Resident	Reg18-T-082
	A change to this policy approach has not been made. We did not consider a change to be necessary as the Local Plan addresses this topic by supporting creation of business spaces in suitable locations, primarily as part of the designated network of town and local centres and on employment designated land. In recognition of the important role that local small businesses play as part of historically established high streets, certain exemptions from the nationally prescribed Sequential Test are also set out under this policy, while balancing the need to protect the vitality and viability of Newham's town and local centres.						HS3 Edge of Centre and Out of Centre	High Street	Reg18-T-082/003		
										Resident	Reg18-T-096
	Unfortunately, it was not clear what change you wanted to make to this part of the Plan. No changes have been made.						HS3 Edge of Centre and Out of Centre	High Street	Reg18-T-096/004		

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
									Reg18-T-103/014	Resident	Reg18-T-103
	A change to this policy approach has not been made. We did not consider a change to be necessary as the Local Plan addresses this topic by supporting creation of business spaces in suitable locations, primarily as part of the designated network of town and local centres and on employment designated land. In recognition of the important role that local small businesses play as part of historically established high streets, certain exemptions from the nationally prescribed Sequential Test are also set out under this policy, while balancing the need to protect the vitality and viability of Newham's town and local centres.						HS3 Edge of Centre and Out of Centre	High Street			
									Reg18-T-105/006	Resident	Reg18-T-105
	Support noted.							HS3 Edge of Centre and Out of Centre	High Street		
						HS3.1			Reg18-E-110/016	Sainsbury's Supermarkets Ltd	Reg18-E-110
	This policy approach has now changed due to the need to clarify the interaction between the exemptions to sequential testing set out in Part 2 for corner food shops and the presumption set out in Part 1. The policy now specifically protects corner food shops where they are the only one servicing the local population within 400m. Please see the new wording in policy HS3. This comment you have provided has not resulted in a change. We did not consider this						HS3 Edge of Centre and Out of Centre	High Street			

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	change to be appropriate as the Retail and Leisure Study 2022 indicated retail need can be accommodated within town and local centres and there is no need to consider edge of centre or out of centre sites. The policy directs retail and leisure uses above 300sqm GIA to the Town Centres Network, as recommended by the Retail and Leisure Study and in line with NPPF (2023) and London Plan (2021) town centre first approach. The policy does not apply to existing uses, unless and until a relevant planning application is made.										
	employer in Newham and employs nearly 30% more people than the second most important sector, education. The Council should consider the economic impacts, including the loss of business rates, if bricks and mortar retailers close.										
	The loss of retail floorspace, wherever it is located, would disproportionately affect women and young people for whom retail is a key source of employment. When compared to other sectors, such as warehousing, the jobs available in retail stores are better paid and have better working conditions. The current wording of Policy HS3 reflects an outdated narrative which portrays a conflict between in-centre retailing against out-of-centre retailing. This was always too simplistic an analysis, and it has certainly been overtaken by technology. The reality is now bricks and mortar retailing (whether in or out of centre) is competing with online retailing. The many restrictions and burdens which the emerging plan places on bricks and mortar retailers is short sighted and will lead to a further reduction in shops and employment in retailing. We encourage the Council to reconsider the wording of this policy.			HS3.1			HS3 Edge of Centre and Out of Centre	High Street	Reg18-E-110/017	Sainsbury's Supermarkets Ltd	Reg18-E-110

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
							HS3.2			Sainsbury's Supermarkets Ltd	Reg18-E-110
	Part 2 of Policy HS3 proposes to introduce a 300sqm threshold for sequential assessments for proposals that would retain or intensify retail uses in edge of centre or out of centre locations. This is onerous and will discourage investment by bricks and mortar retailers when the Council should be encouraging investment. In a market where bricks and mortar retailers are competing with online retailers who have significantly lower costs (including much lower business rates), it is not realistic to think that a retailer can be forced by policy to locate somewhere that they do not want to trade. The investor will simply go somewhere that encourages investment. It also conflicts with the 15-minute City concept that is promoted in the emerging Plan. At the very least the threshold should rise to 1,000sqm.						HS3 Edge of Centre and Out of Centre	High Street	Reg18-E-110/018		
	This wording change has not been made. We did not consider this change to be appropriate as the Retail and Leisure Study 2022 indicated retail need can be accommodated within the Town Centres Network and there is no need to consider edge of centre or out of centre sites. The policy directs retail and leisure uses above 300sqm GIA to the Town Centres Network, as recommended by the Retail and Leisure Study and in line with NPPF and London Plan town centre first approach. The policy does not apply to existing uses, unless and until a relevant planning application is made.										
							HS3.3			Sainsbury's Supermarkets Ltd	Reg18-E-110
	Part 3 of Policy HS3 proposes to introduce a 300sqm threshold for Retail Impact Assessments where the proposal is in a neighbourhood parade, edge of centre or out of centre location. This will affect proposals for small convenience stores within the Borough and is likely create deficiency within the 15-minute network in edge-of-centre and out-of-centre locations. The threshold for RIA should be increased to bring it in line with national policy.						HS3 Edge of Centre and Out of Centre	High Street	Reg18-E-110/019		
	This wording change has not been made. We did not consider this change to be appropriate as the Retail and Leisure Study 2022 indicated retail need can be accommodated within the Town Centres Network and there is no need to consider edge of centre or out of centre sites. The policy directs retail and leisure uses above 300sqm GIA to the Town Centres Network, as recommended by the Retail and Leisure Study and in line with NPPF and London Plan town centre first approach. The policy does not apply to existing uses, unless and until a relevant planning application is made.										

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-110	Sainsbury's Supermarkets Ltd	Reg18-E-110/020	High Street	HS3 Edge of Centre and Out of Centre			HS3.4b			<p>Part 4b of the policy states that where the sequential test threshold is met, a planning condition or obligation should be imposed to 'require the submission and approval of an adequately resourced Meanwhile Use Strategy and Marketing Strategy'. This requirement is, again, an unnecessary burden. It should not be imposed through policy and instead should be on a case-by-case basis to ensure the requirement meets the tests for conditions and obligations. It is inappropriate to impose such restrictions through policy and it should be removed.</p>	<p>A change to this policy approach has not been made, however additional detail has been added to the implementation section of policy HS2. Our monitoring indicates that a number of recent large scale mixed use developments, including main town centre uses, have remained vacant for extended periods of times, sometimes years following completion - for example, Rathbone Market in Canning Town, and Silvertown/Royal Wharf. It is therefore imperative that the Local Plan process enables proactive management of this issues. The national Impact Test is not effective at testing the feasibility of the quantum and type of uses proposed as it is intended to only manage impact on the wider network. These additional tools help address this gap and are based on case studies showing they are effective at driving proactive management of main town centres uses floorspace. This is all the more important where Newham is seeking to establish completely new centres.</p> <p>The potential benefits of having a meanwhile use approach to managing vacancies, or a Vacancy Prevention Strategy as it is now named in the Reg 19 draft policy, are becoming more established, with positive evidence emerging from the High Streets Task Force and other case studies - please see Topic Paper: Managing Vacancies Through Meanwhile Use Strategies (2024) appended to the Retail and Leisure Study (2022), and resulting amendments to policy HS2 and its implementation criteria for Vacancy</p>

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Prevention Strategies. The effectiveness of having a Marketing Strategy to prompt proactive market research and seeking occupier commitments has been demonstrated through current DM practice. For example, new Local Centre being delivered at Albert Basin (14/00664/OUT) includes a planning obligation for the developer to provide a Commercial Strategy to the Council for approval, which has prompted review of marketing approach following start of second phase of development (22/01505/S106), to support occupation of floorspace once completed. The policy aims to adopt this best practice approach for all developments including 2500 sqm or more of main town centre uses floorspace, and particularly for developments delivering new Local Centres.										
	Support noted. This wording change has been made. Please see the new wording in implementation section of policy HS3.	4. Retail a. Draft Policy HS3 (Edge-of-centre and out-of-centre retail, restaurants, cafés and services) <u>SEGRO supports the clarification within the draft Policy of which Class E uses the policy would apply to.</u> It is noted that draft Policies BFN1 and J1 acknowledge the role of intensifying out-of-centre retail and leisure parks for industrial uses. SEGRO suggest that a mirror reference is made within draft Policy HS3 for clarification.		HS3.1			HS3 Edge of Centre and Out of Centre	High Street	Reg18-E-116/022	SEGRO Plc	Reg18-E-116

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
									Reg18-E-111/049	The Silvertown Partnership LLP	Reg18-E-111
	Comment noted. The 15 minute neighbourhood concept has been incorporated into the whole Local Plan. In the case of this policy, it has informed the designations within Newham's Town Centres Network, alongside the requirements of the NPPF (2023) and London Plan (2021) and the recommendations of the Retail and Leisure Study (2022). Please see Town Centre Network Review Methodology Paper 2022 and the Town Centre Network Review Methodology Paper Update 2024.						HS3 Edge of Centre and Out of Centre	High Street			
							HS3.2a	HS3 Edge of Centre and Out of Centre	Reg18-E-111/050	The Silvertown Partnership LLP	Reg18-E-111
	Support noted.										
							HS3.2a/3	HS3 Edge of Centre and Out of Centre	Reg18-E-111/051	The Silvertown Partnership LLP	Reg18-E-111
	A change to this policy approach has not been made. We did not consider this change to be appropriate as it is in line with the National Planning Policy Framework requirement for impact testing outside of town centres (in Newham, these are Local Centres and Town Centres of a London scale) and the Retail and Leisure Study (2022) that also recommends that the threshold should remain at 300sqm GIA in order to protect Newham's Local Centres. Policy HS3 allows for some flexibility to help the conservation of heritage assets,										

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	however this needs to be balanced with other objectives of the plan such as protecting the vitality and viability of Newham's town centres. There is no evidence to suggest that the benefits of allowing main town centre use activation of heritage assets will always outweigh potential harm to the vitality and viability of town centres. This will be assessed on a case by case basis.										
	A change to this policy approach has not been made. We did not consider this change to be appropriate as it is in line with the National Planning Policy Framework requirement for impact testing outside of town centres (in Newham, these are Local Centres and Town Centres of a London scale) and the Retail and Leisure Study (2022) that also recommends that the threshold should remain at 300sqm GIA in order to protect Newham's Local Centres.						HS3.3	HS3 Edge of Centre and Out of Centre	High Street	Reg18-E-111/052	The Silvertown Partnership LLP
	This wording change has not been made. We did not consider this change to be appropriate as the planning permission in the out of centre location is granted based on the proposed use and the identified level of impact. Without adequate conditioning, a different use within use class E may operate on the site and result in local impacts that have not been assessed or mitigated against.						HS3.4	HS3 Edge of Centre and Out of Centre	High Street	Reg18-E-111/053	The Silvertown Partnership LLP

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-111	The Silvertown Partnership LLP	Reg18-E-111/054	High Street	HS3 Edge of Centre and Out of Centre			HS3.4a			[Appendix A] Part 4a should be expanded in terms of the potential for sites such as Silvertown to deliver night-time economy uses in a planned way that helps to reduce the decline in evening economy venues.	A change to this policy approach has not been made. An Evening and Night Time Economy Zone for Silvertown Local Centre was considered as an option in the IIA, but not taken forward for the following reasons. Firstly, Silvertown Local Centre is recommended to retain a Local Centre scale following assessment of need through the Retail and Leisure Study (2022), and there is no further evidence to suggest a larger Town Centre designation would be appropriate in this location under current needs and commercial property market conditions. Secondly, the Royal Docks area does not benefit from sufficient night time public transport, with the DLR will not be operating as an all-night service and only one-night bus servicing the south of the Royal Docks, between North Woolwich and Connaught Bridge only. Please see IIA options assessment for further details. Silvertown is allocated in the Plan to function as a Local Centre, and may develop an evening and night time offer commensurate with this designation.
Reg18-E-111	The Silvertown Partnership LLP	Reg18-E-111/055	High Street	HS3 Edge of Centre and Out of Centre			HS3.4b			[Appendix A] Part 4b sets out that where the sequential test threshold is met, a planning condition or obligation should be imposed to “require the submission and approval of an adequately resourced Meanwhile Use Strategy and Marketing Strategy.” Imposing this requirement through policy does not meet the planning condition or planning obligations tests, and it is not appropriate to	A change to this policy approach has not been made, however additional detail has been added to the implementation section of policy HS2. Our monitoring indicates that a number of recent large scale mixed use developments, including main town centre uses, have remained vacant for extended periods of times, sometimes years following completion - for example, Rathbone Market in Canning Town, and Silvertown/Royal Wharf. It is

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	therefore imperative that the Local Plan process enables proactive management of this issues. The national Impact Test is not effective at testing the feasibility of the quantum and type of uses proposed as it is intended to only manage impact on the wider network. These additional tools help address this gap and are based on case studies showing they are effective at driving proactive management of main town centres uses floorspace. This is all the more important where Newham is seeking to establish completely new centres. The potential benefits of having a meanwhile use approach to managing vacancies, or a Vacancy Prevention Strategy as it is now named in the Reg 19 draft policy, are becoming more established, with positive evidence emerging from the High Streets Task Force and other case studies - please see Topic Paper: Managing Vacancies Through Meanwhile Use Strategies (2024) appended to the Retail and Leisure Study (2022), and resulting amendments to policy HS2 and its implementation criteria for Vacancy Prevention Strategies. The effectiveness of having a Marketing Strategy to prompt proactive market research and seeking occupier commitments has been demonstrated through current DM practice. For example, new Local Centre being delivered at Albert Basin (14/00664/OUT) includes a planning obligation for the developer to provide a Commercial Strategy to the Council for approval, which has prompted review of	use conditions/obligations to impose broad unnecessary controls.									

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	marketing approach following start of second phase of development (22/01505/S106), to support occupation of floorspace once completed. The policy aims to adopt this best practice approach for all developments including 2500 sqm or more of main town centre uses floorspace, and particularly for developments delivering new Local Centres.										
	Support noted.	Abrdn supports a policy that encourages a diverse mix of uses to support the town centre economy including markets, events and pop-up spaces, subject to safety and design considerations.					HS4 Markets and Events/Pop-Up Spaces	High Street	Reg18-K-001/013	Abrdn	Reg18-K-001
	A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan is applied in the round, and the Climate Emergency policies will direct sustainable construction practices applicable to the development.	P.105 HS4: Markets and events/pop-up spaces 1. 'Development proposals impacting existing markets will only be supported where:' Comment: We would suggest adding: c. There is clear evidence that the proposals work with sustainable principles, as part of addressing the climate change crisis.				HS4.1	HS4 Markets and Events/Pop-Up Spaces	High Street	Reg18-E-133/010	Climate You Change	Reg18-E-133

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. The Local Plan addresses sustainable deliveries through Policy T3, and the green economy through employment policies, site allocations and support for the circular economy. However, the Local Plan cannot deliver the wider changes you have requested. Our colleagues in Markets department may be able to help. We have also provided them with your comments.			HS4.2			HS4 Markets and Events/Pop-Up Spaces	High Street	Reg18-E-133/011	Climate You Change	Reg18-E-133

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
							HS4.3			Climate You Change	Reg18-E-133
	P.105 3. 'Permanent new markets or short-lease flexible use or event spaces will be supported within Town and Local Centres where:' Comment: We would suggest adding: e. it can be demonstrated that the market organisers, stallholders and events planners will be working with sustainable principals to lower the carbon footprint of their operations and products being sold.						HS4 Markets and Events/Pop-Up Spaces	High Street	Reg18-E-133/012		
		HS4.3					HS4 Markets and Events/Pop-Up Spaces	High Street	Reg18-E-133/013	Climate You Change	Reg18-E-133
	P106. Implementation HS4.3 'The Management Plan should address:' 2 Comment: We suggest adding: • Details of how the space will be used sustainably, with as minimal carbon footprint impact as possible						HS4 Markets and Events/Pop-Up Spaces	High Street			
							HS4 Markets and Events/Pop-Up Spaces	High Street	Reg18-E-133/190	Climate You Change	Reg18-E-133
	Additional suggestions for HS4: Markets and events/pop-up spaces not covered by the Newham's Draft Local Plan – Below was based on work that we did to present to Clive Kershaw for suggestions around rebranding Queens Market as a market centre for sustainability (using the name Green Street, to align with the market's history and previous name). However, we could see the same ideas working for other markets such as the market being redeveloped in the East Ham Barrett redevelopment and for areas potentially suitable for a market, such as the plaza						HS4 Markets and Events/Pop-Up Spaces	High Street			
	Comment noted. However, the Local Plan cannot deliver the change you have requested. Our colleagues in Markets department may be able to help. We have also provided them with your comments.										
	This wording change has been made, please see revised wording in the implementation section of Policy HS4.										
	Comment noted. However, the Local Plan cannot deliver the change you have requested. Our colleagues in Markets department may be able to help. We have also provided them with your comments.										

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		outside the Globe Library at Beckton. We suggest that all workable ideas be included in Newham's Local Plan.									
		Sustainable re-usable shopping bags – these could be printed with the market logo and wording to express the sustainable nature of the market. They could be available at cost from the market or from stallholders, with a small margin for them to include these within their offer. PET bags have a far lower carbon footprint than cotton or other re-useable bags and make use of old waste material.					HS4 Markets and Events/Pop-Up Spaces	High Street	Reg18-E-133/192	Climate You Change	Reg18-E-133
		Signage could enhance sustainability credentials of the market, with messages like 'Protecting the Future for the Next Generation', 'Conscious Consumption', 'Planet-friendly'. It could also be used to encourage more sustainable choices, such as buying fruit and veg with lower shipping miles or misshapen produce: 'Buy Local', 'Buy in Season' 'Wonky Veg – good food, not waste'.					HS4 Markets and Events/Pop-Up Spaces	High Street	Reg18-E-133/193	Climate You Change	Reg18-E-133
		Comment noted. However, the Local Plan cannot deliver the change you have requested. Our colleagues in Markets department may be able to help. We have also provided them with your comments.									
		Comment noted. However, the Local Plan cannot deliver the change you have requested. Our colleagues in Markets department may be able to help. We have also provided them with your comments.									

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
									Reg18-E-133	Climate You Change	Reg18-E-133/194
	It could be suggested to stall holders that they use this to educate people, with 'Buying British' sections, 'Buying from Europe' sections (to discourage as many purchases of higher shipping miles foods), 'In Season' sections and 'Perfectly Imperfect' sections (or words to this effect, as Sainsbury's use this for imperfect veg).						HS4 Markets and Events/Pop-Up Spaces	High Street			
	Comment noted. However, the Local Plan cannot deliver the change you have requested. Our colleagues in Markets department may be able to help. We have also provided them with your comments.										
									Reg18-E-133	Climate You Change	Reg18-E-133/195
	Signage could be used to suggest that customers bring their own bags						HS4 Markets and Events/Pop-Up Spaces	High Street			
	Comment noted. However, the Local Plan cannot deliver the change you have requested. Our colleagues in Markets department may be able to help. We have also provided them with your comments.										
									Reg18-E-133	Climate You Change	Reg18-E-133/196
	Suggestions like bring your own bag and get a free apple, paid for by the Council as part of a sustainability push during the introductory phase of the redeveloped market.						HS4 Markets and Events/Pop-Up Spaces	High Street			
	Comment noted. However, the Local Plan cannot deliver the change you have requested. Our colleagues in Markets department may be able to help. We have also provided them with your comments.										

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/197	High Street	HS4 Markets and Events/Pop-Up Spaces						HOW TO MAKE DIFFERENT MARKETS CENTRES FOR SUSTAINABILITY The following are potential zoning ideas and initiatives that could help make Newham Markets into 'meccas for Sustainability'.	Comment noted.
Reg18-E-133	Climate You Change	Reg18-E-133/198	High Street	HS4 Markets and Events/Pop-Up Spaces						The Repair Zone – an area highlighted by bold signage for mending businesses, such as shoe menders and skilled, affordable seamstresses making repairs. Ideally, also an electrical repair zone and somewhere to buy reconditioned electrical goods, including devices. Any haberdashery businesses could sit at the edge of 'The Repair Zone'.	Comment noted. However, the Local Plan cannot deliver the change you have requested. Our colleagues in Markets and Climate Action teams may be able to help. We have also provided them with your comments.
Reg18-E-133	Climate You Change	Reg18-E-133/199	High Street	HS4 Markets and Events/Pop-Up Spaces						The Preloved Zone – an area where stallholders (and maybe also shopkeepers) sell 'pre-loved' clothes, toys, books etc. Pre-owned goods could be displayed to increase their overall attractiveness, to help psychologically with such a transition for traders/shopkeepers and customers alike; grouped by colours, product types, themes or sizes.	Comment noted. However, the Local Plan cannot deliver the change you have requested. Our colleagues in Markets department may be able to help. We have also provided them with your comments.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/200	High Street	HS4 Markets and Events/Pop-Up Spaces						Little Free Library Book Boxes to encourage book donations, swapping and re-use, keeping books in circulation for longer.	Comment noted. However, the Local Plan cannot deliver the change you have requested. Our colleagues in Markets department may be able to help. We have also provided them with your comments.
Reg18-E-133	Climate You Change	Reg18-E-133/201	High Street	HS4 Markets and Events/Pop-Up Spaces						The Eco Zone/Green Zone – an area where stall holders/shopkeepers include affordable, practical versions of less sustainable options: solid palm oil free soap bars, some of the more price conscious palm oil free shampoo bars, such as the brand Friendly Soap, products made for re-use etc.	Comment noted. However, the Local Plan cannot deliver the change you have requested. Our colleagues in Markets and Climate Action teams may be able to help. We have also provided them with your comments.
Reg18-E-133	Climate You Change	Reg18-E-133/202	High Street	HS4 Markets and Events/Pop-Up Spaces						Drawstring mesh fruit and veg bags made from recycled PET bottles available for customers to purchase. Another alternative to plastic, albeit less sustainable from bags made for re-use would be compostable carrier bags. (British Heart Foundation sell these.)	Comment noted. However, the Local Plan cannot deliver the change you have requested. Our colleagues in Markets and Climate Action teams may be able to help. We have also provided them with your comments.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/203	High Street	HS4 Markets and Events/Pop-Up Spaces						Can the Council make it mandatory for stallholders to charge for plastic bags?	Comment noted. However, the Local Plan cannot deliver the change you have requested. Our colleagues in Markets and Climate Action teams may be able to help. We have also provided them with your comments.
Reg18-E-133	Climate You Change	Reg18-E-133/204	High Street	HS4 Markets and Events/Pop-Up Spaces						The Sustainable Food Zone – Refill stalls and shops. Existing stall holders could have an expanded offer of dry goods within their stalls via link-ups with owners of refill businesses or they could look to change their offer independently. Customers could buy spices, rice, pasta lentils, pulses etc. Could it be mandatory for all dry goods to be sold as refills?	Comment noted. However, the Local Plan cannot deliver the change you have requested. Our colleagues in Markets department may be able to help. We have also provided them with your comments.
Reg18-E-133	Climate You Change	Reg18-E-133/205	High Street	HS4 Markets and Events/Pop-Up Spaces						For competitive prices goods could be non-organic. However, some basic organic products would appeal to newer, sustainability-conscious consumers moving into the area, wishing to lower their carbon footprint, through food grown without fossil fuel derived pesticides.	Comment noted. However, the Local Plan cannot deliver the change you have requested. Our colleagues in Markets department may be able to help. We have also provided them with your comments.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
									Reg18-E-133	Climate You Change	Reg18-E-133/206
	Plant based alternative food products would be ideal, as part of the food products on offer, including within onsite cafés.						HS4 Markets and Events/Pop-Up Spaces	High Street			
	Comment noted. The Local Plan addresses this topic through promoting a mix of leisure and retail uses in town centre as part of policy HS2. However, the Local Plan cannot deliver the change you have requested. Our colleagues in Markets department may able to help. We have also provided them with your comments.										
									Reg18-E-133	Climate You Change	Reg18-E-133/207
	Food Waste Saviours/Food Waste Heroes - An area where waste food can be taken to be used according to edibility.						HS4 Markets and Events/Pop-Up Spaces	High Street			
	Comment noted. However, the Local Plan cannot deliver the change you have requested. Our colleagues in Markets department may able to help. We have also provided them with your comments.										
									Reg18-E-133	Climate You Change	Reg18-E-133/208
	Perfectly Edible surplus food given free to FoodCycle to be used to make meals to be distributed to those in need and/or to Hare Krishna to provide free meals to the homeless and/or available to be used on the food sharing app Olio. Edible surplus food could also be used in on-site cafés.						HS4 Markets and Events/Pop-Up Spaces	High Street			
	Comment noted. However, the Local Plan cannot deliver the change you have requested. Our colleagues in Markets department may able to help. We have also provided them with your comments.										

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
									Reg18-E-133	Climate You Change	Reg18-E-133/209
	Community fridge – easy to find, sign-posted and easily visible to deter ASB.						HS4 Markets and Events/Pop-Up Spaces	High Street			
									Reg18-E-133	Climate You Change	Reg18-E-133/210
	Composted fruit/veg unfit for human consumption.						HS4 Markets and Events/Pop-Up Spaces	High Street			
									Reg18-E-133	Climate You Change	Reg18-E-133/211
	Free water refill station, to reduce single use plastic bottles - with strong signage easily seen from the front of markets pointing to the location, plus alongside other signs highlighting sustainability measures that residents can make.						HS4 Markets and Events/Pop-Up Spaces	High Street			
	Comment noted. However, the Local Plan cannot deliver the change you have requested. Our colleagues in Markets department may be able to help. We have also provided them with your comments.										
	Comment noted. However, the Local Plan cannot deliver the change you have requested. Our colleagues in Markets and Climate Action teams may be able to help. We have also provided them with your comments.										
	Comment noted. The Local Plan supports delivery of water drinking fountains in the public realm as part of policies D2 and HS2. However, the Local Plan cannot deliver the wider change you have requested. Our colleagues in Markets and Climate Action teams may be able to help. We have also provided them with your comments.										

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
									Reg18-E-133	Climate You Change	Reg18-E-133/212
	Food waste workshops – Climate You Change would be interested in working on these, which could be in partnership with anyone else doing this in the borough.						HS4 Markets and Events/Pop-Up Spaces	High Street			
									Reg18-E-133	Climate You Change	Reg18-E-133/217
	Sustainability days – a way of showcasing different events at the same time. It could include a few different products offered to consumers, to help with making more sustainable choices.						HS4 Markets and Events/Pop-Up Spaces	High Street			
									Reg18-E-133	Climate You Change	Reg18-E-133/218
	Farmers market and pop-up events (featuring upcycled/repurposed items) – a way of using existing markets on days that they might otherwise be closed and providing a different offer for residents who want to buy as sustainably as possible. This could bring in residents from other Newham neighbourhoods. They could work alongside jumble trail events (featuring road closures).						HS4 Markets and Events/Pop-Up Spaces	High Street			
	Comment noted. Our colleagues in Markets and Climate Action teams may able to help. We have also provided them with your comments.										
	Comment noted. However, the Local Plan cannot deliver the change you have requested. Our colleagues in Markets department may able to help. We have also provided them with your comments.										
	Comment noted. However, the Local Plan cannot deliver the change you have requested. Our colleagues in Markets and Climate Action teams may able to help. We have also provided them with your comments.										

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. However, the Local Plan cannot deliver the change you have requested. Our colleagues in Markets department may be able to help. We have also provided them with your comments.	Student Days – regular days or occasional events offering modest discounts/free branded promotional items/small freebies on purchases for students could help attract younger people to the market. This could help with the existing students at UEL and local colleges, as well future students from the soon to be London College of Fashion campus and Sadler’s Wells. Discounts etc. could either be covered by a small sum of market redevelopment money or by stallholders/shopkeepers, if they chose to offer occasional incentives to attract an increased customer base.					HS4 Markets and Events/Pop-Up Spaces	High Street	Reg18-E-133/219	Climate You Change	Reg18-E-133
	This change has been made, please see new wording in implementation section of policy HS4.	GREENING IN OUTDOOR MARKET SPACES, INCLUDING IN-GROUND PLANTING					HS4 Markets and Events/Pop-Up Spaces	High Street	Reg18-E-133/220	Climate You Change	Reg18-E-133
	Comment noted. A change to the policy approach has not been made. We did not consider this change to be necessary as the Local Plan protects existing markets and supports establishment of new ones. See policy HS4.	Safeguarding of street markets There is limited comment in the Local Plan about safeguarding street markets in the borough, including in Green Street and East Ham. These are critical for local residents, many					HS4 Markets and Events/Pop-Up Spaces	Home s	Reg18-E-151 /058	Cllr Islam, Cllr Beckles, Cllr Choudhury, Cllr Corben, Cllr Master, Cllr Sarley Pontin	Reg18-E-151

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		<p>of whom are on low income and live in deprived areas. These markets enable such people</p> <p>to access affordable foods and essential items. They add to the character of places and also enable and support social interaction.</p>									
	<p>Comment noted. A change to the policy approach has not been made. We did not consider this change to be necessary as the Local Plan protects existing markets and supports establishment of new ones. See policy HS4.</p>	<p>Safeguarding of street markets</p> <p>There is limited comment in the Local Plan about safeguarding street markets in the borough, including in Green Street and East Ham. These are critical for local residents, many</p> <p>of whom are on low income and live in deprived areas. These markets enable such people</p> <p>to access affordable foods and essential items. They add to the character of places and also enable and support social interaction.</p>					HS4 Markets and Events/Pop-Up Spaces	Homes	Reg18-E-151/059	Cllr Islam, Cllr Beckles, Cllr Choudhury, Cllr Corben, Cllr Master, Cllr Sarley Pontin	Reg18-E-151

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		<p>Safeguarding of street markets</p> <p>There is limited comment in the Local Plan about safeguarding street markets in the borough, including in Green Street and East Ham. These are critical for local residents, many of whom are on low income and live in deprived areas. These markets enable such people to access affordable foods and essential items. They add to the character of places and also enable and support social interaction.</p>					HS4 Markets and Events/Pop-Up Spaces	Homes	Reg18-E-151/060	Cllr Islam, Cllr Beckles, Cllr Choudhury, Cllr Corben, Cllr Master, Cllr Sarley Pontin	Reg18-E-151
		<p>Safeguarding of street markets</p> <p>There is limited comment in the Local Plan about safeguarding street markets in the borough, including in Green Street and East Ham. These are critical for local residents, many of whom are on low income and live in deprived areas. These markets enable such people to access affordable foods and essential items. They add to the character of places</p>					HS4 Markets and Events/Pop-Up Spaces	Homes	Reg18-E-151/061	Cllr Islam, Cllr Beckles, Cllr Choudhury, Cllr Corben, Cllr Master, Cllr Sarley Pontin	Reg18-E-151

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	and also enable and support social interaction.										
	<p>Safeguarding of street markets</p> <p>There is limited comment in the Local Plan about safeguarding street markets in the borough, including in Green Street and East Ham. These are critical for local residents, many of whom are on low income and live in deprived areas. These markets enable such people to access affordable foods and essential items. They add to the character of places and also enable and support social interaction.</p>						HS4 Markets and Events/Pop-Up Spaces	Homes	Reg18-E-151/062	Cllr Islam, Cllr Beckles, Cllr Choudhury, Cllr Corben, Cllr Master, Cllr Sarley Pontin	Reg18-E-151

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	The Local Plan addresses the issue of appropriate infrastructure to support markets, including storage, through policy HS4. However, it cannot deliver the change you have requested. Our Colleagues in the Markets department may be able to help, we have also provided them with your comments.	[Manor Park Pop-Up Market] Storage issues also make the set up more complicated than it could be. I know the council supported Woodgrange Road Market in helping fund storage close to the market.			HS4.1		HS4 Markets and Events/Pop-Up Spaces	High Street	Reg18-E-021/002	Manor Park Pop Up Market	Reg18-E-021
	This policy approach has now changed due to the need to address how markets and pop-up uses should conform to supporting health and wellbeing and complement policy HS6. Please see new text in policy HS4. However, it cannot deliver the wider changes you have proposed. Our colleagues in Markets department are able to help. We have also provided them with your comments.	HS4.1/3 <ul style="list-style-type: none"> • Page.86. A more innovative approach is needed in developing high streets as destinations for a range of activities. As part of this process appropriate and affordable spaces should also be considered and allocated for food markets and open space food courts including having appropriate and preinstalled infrastructure such as electricity, lighting and plumbing. There are high levels of deprivation in Newham and income availability is limited for many residents, affordable fresh fruit and vegetables are critical to health and wellbeing especially in deprived areas. Further food courts serving hot food must offer opportunities for local people to lease and rent space at affordable prices. Note that there is a large BAME community in Newham and hawker type food offer would be culturally appealing. 					HS4 Markets and Events/Pop-Up Spaces	High Street	Reg18-E-082/034	Resident	Reg18-E-082

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
							HS4 Markets and Events/Pop-Up Spaces	High Street	Reg18-T-002/056	Resident	Reg18-T-002
	A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan set out a vision for each town centre as part of the Neighbourhood policies, where there is the evidence to do so. These locally specific policies work with the more generic high street policies to address development in a way that is respectful of, and aspirational for, the local area while also meeting national requirements and responding to broad trends affecting all high streets. We also work with colleagues in Regeneration who play a more active role in making improvements on high streets. However, the Local Plan cannot deliver the change you have requested, as the planning system cannot direct what goods or services markets provide. We have also provided our Regeneration and Newham Markets colleagues with your comments.										
							HS4 Markets and Events/Pop-Up Spaces	High Street	Reg18-T-026/006	Resident	Reg18-T-026
	Support noted. Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. No additions have been made.										

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
									Reg18-T-026/007	Resident	Reg18-T-026
	This addition has not been made. The Local Plan protects existing markets and supports establishment of new ones. However, it cannot deliver the change you have requested as the Local Plan cannot affect the operation of existing markets. The Markets department may be able to help; we have also provided them with your comments.						HS4 Markets and Events/Pop-Up Spaces	High Street			
									Reg18-T-026/008	Resident	Reg18-T-026
	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. The policy already supports activation of the public realm on high streets through markets and pop-up activities. No additions have been made.						HS4 Markets and Events/Pop-Up Spaces	High Street			
									Reg18-T-026/009	Resident	Reg18-T-026
	Comments noted.						HS4 Markets and Events/Pop-Up Spaces	High Street			

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-034	Resident	Reg18-T-034/015	High Street	HS4 Markets and Events/Pop-Up Spaces					HS4. 1/3	[Add to it] Well maintained market areas	The Local Plan protects existing markets and supports establishment of new ones. However, it cannot deliver the change you have requested as the Local Plan cannot affect the operation of existing markets. The Markets department may be able to help; we have also provided them with your comments.
Reg18-T-034	Resident	Reg18-T-034/016	High Street	HS4 Markets and Events/Pop-Up Spaces						[Add to it] with a affordable access to a range of vendors and community ventures.	The Local Plan protects existing markets and supports establishment of new ones, recognising that they offer more affordable opportunities for small local businesses. It also requires developments providing larger quantities of floorspace for town centre uses to also provide smaller units at affordable rents. However, it cannot deliver the change you have requested as the Local Plan cannot affect the operation of existing markets or set stall rental costs. The Markets department may be able to help; we have also provided them with your comments.
Reg18-T-034	Resident	Reg18-T-034/017	High Street	HS4 Markets and Events/Pop-Up Spaces					HS4. 1/3	[Add to it] Well-maintained garden spaces.	A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan addresses this topic through policies HS2, D2 and GWS1, including requiring that enhancements to the public realm (including garden spaces) is well maintained. However, the policies cannot be applied retrospectively.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-034	Resident	Reg18-T-034/018	High Street	HS4 Markets and Events/Pop-Up Spaces					HS4. 1/3	[Add to it] Avoid seating areas as these tend to encourage street drinking and ASB.	A change to this policy approach has not been made. We did not consider this change to be necessary as improving safety and feelings of safety is addressed through a range of policies in the Local Plan including design policies, high street policies, green and water spaces policies and through the neighbourhood policies which require improved public realm, safe walking and cycling routes and the design of sites to increase overlooking and feelings of safety. Design policies address the use of CCTV, lighting and public realm furniture such as seating.
Reg18-T-082	Resident	Reg18-T-082/004	High Street	HS4 Markets and Events/Pop-Up Spaces						[Add to it] More pop up markets should be available like how there is in Whitechapel and Romford	No additions have been made as policy HS4 already supports the delivery of new markets and other types of pop up activation of spaces in high streets. However, the Plan cannot force landowners to bring development forward.
Reg18-T-098	Resident	Reg18-T-098/011	High Street	HS4 Markets and Events/Pop-Up Spaces						[Add to it]	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. No additions have been made.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-103	Resident	Reg18-T-103/015	High Street	HS4 Markets and Events/Pop-Up Spaces						[Change it] Available for local business	A change to this policy approach has not been made. We did not consider a change to be necessary as the Local Plan addresses the need for space for local businesses through a range of policies, including by protecting existing markets and supporting new markets being established as part of this policy, HS4. Policy HS2 supports local businesses by requiring the provision of small affordable rent units in larger developments and by supporting temporary activation of empty high street units. Further provision of floorspace for businesses is also supported through policy J1.
Reg18-E-111	The Silvertown Partnership LLP	Reg18-E-111/056	High Street	HS4 Markets and Events/Pop-Up Spaces			HS4.2d			[Appendix A] The policy focus on encouraging temporary events / pop ups in Local Centres is supported. Further clarification is required regarding Part 2 (d), as while public engagement / co-design of temporary activities is supportable in principle, the process should be streamlined in order to not create a significant burden which could reduce the attractiveness of delivering such uses.	This change has been made. Please see new wording in implementation section of policy HS4.
Reg18-E-080	Transport Trading Limited Properties Limited	Reg18-E-080/030	High Street	HS4 Markets and Events/Pop-Up Spaces						Draft Policy HS4: Markets and Events / Pop-up spaces Draft Policy HS4 only supports the delivery of markets, events and pop-up spaces within designated town or local centres. This policy conflicts with draft Policy BFN2 which supports the delivery of meanwhile uses on phased sites (which may include pop-up spaces, markets and events). Further clarification on the Council's position should be provided.	Comment noted. Meanwhile uses are not necessarily markets, or singular pop-up events. Policy HS4 addresses activation of spaces within established high streets, while policy BFN2 addresses temporary activation of vacant sites (or vacant land on phased sites) ahead of redevelopment. The policies are complementary. However, further guidance has been provided to policy BFN1 guidance to clarify the scope of meanwhile uses on vacant land.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		benefit from sufficient night time public transport, with the DLR not operating as an all-night service and only one night bus servicing the south of the Royal Docks, between North Woolwich and Connaught Bridge only. Please see the IIA options assessment for further details. Silvertown is allocated in the Plan to function as a Local Centre, and may develop an evening and night time offer commensurate with this designation.									
	This policy approach has now changed to provide further clarity on the application of Agent of Change to protect the Evening and Night Time Economy Zones of town centres. Please see the new wording in Policy D6.	HS5.4					HS5 Visitor Evening and Night Time Economy	High Street	Reg18-E-131/016	Friends of Queens Market	Reg18-E-131
	Support noted.					HS5.1 Table 4	HS5 Visitor Evening and Night Time Economy	High Street	Reg18-E-130/099	Hadley Property Group	Reg18-E-130

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed to allow for more flexibility, in line with NPPF and in the context of Use Class E. Please see the new wording in Policy HS5.			HS5.Table 5			HS5 Visitor Evening and Night Time Economy	High Street	Reg18-E-130/100	Hadley Property Group	Reg18-E-130
	This policy approach has now changed to allow for more flexibility, in line with NPPF and in the context of Use Class E. Please see the new wording in Policy HS5.			HS5.Table 5			HS5 Visitor Evening and Night Time Economy	High Street	Reg18-E-130/101	Hadley Property Group	Reg18-E-130
	This justification text wording has now changed to reflect the changed status of the site. Please see the new wording in Policy HS5.		3.75				HS5 Visitor Evening and Night Time Economy	High Street	Reg18-E-082/036	Resident	Reg18-E-082

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-002	Resident	Reg18-T-002/057	High Street	HS5 Visitor Evening and Night Time Economy			HS5 Table 5			[Change it] We need gig venues, quality restaurants, quality arts events and galleries, and most of all, opportunities for artists, in order to start generating the sort of night time economy that most neighbouring areas have.	A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan addresses this topic through policy HS5, which promotes growth of evening and night time economy entertainment and leisure in appropriate locations across all areas of the borough. The policy also requires businesses operation late into the evening and at night to have appropriate management plans to address their amenity impacts and promote a safe and pleasant environment. Further, policy HS6 promotes take up of healthy food standards. However, the Local Plan cannot deliver the change you have requested as planning policy cannot control who take up the business spaces delivered and the overall operation of the site. It also cannot apply standards retrospectively to existing lawful development.
Reg18-T-002	Resident	Reg18-T-002/058	High Street	HS5 Visitor Evening and Night Time Economy			HS5 Table 5			[Change it] My wife and I, friends and neighbours should be able to go to multiple different GOOD QUALITY pubs, restaurants, arts venues, an independent cinema, within 15 or 20 minutes walk from our house. Currently there are none of these apart from Applecart Arts and everyone I know goes elsewhere for night time entertainment.	A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan addresses this topic through policy HS5, which promotes growth of evening and night time economy entertainment and leisure in appropriate locations across all areas of the borough. The policy also requires businesses operation late into the evening and at night to have appropriate management plans to address their amenity impacts and promote a safe and pleasant environment. Further, policy HS6 promotes take up of healthy food standards. However, the Local Plan cannot deliver the change you have requested as planning policy

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	cannot control who take up the business spaces delivered and the overall operation of the site. It also cannot apply standards retrospectively to existing lawful development.										
	A change to this policy approach has not been made. We did not consider a change to be necessary as the Local Plan addresses this topic through policy HS5, which promotes growth of evening and night time economy entertainment and leisure in appropriate locations across all areas of the borough, including Green Street and East Ham town centres.					HS5.1	HS5 Visitor Evening and Night Time Economy	High Street	Reg18-T-098/012	Resident	Reg18-T-098
	A change to this policy approach has not been made. An Evening and Night Time Economy Zone for Silvertown Local Centre was considered as an option in the IIA, but not taken forward for the following reasons. Firstly, Silvertown Local Centre is recommended to retain a Local Centre scale following assessment of need through the Retail and Leisure Study (2022), and there is no further evidence to suggest a larger Town Centre designation would be appropriate in this location under current needs and commercial property market conditions. Secondly, the Royal Docks area does not					HS5.1 Table 4	HS5 Visitor Evening and Night Time Economy	High Street	Reg18-E-092/022	Royal Docks	Reg18-E-092

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	benefit from sufficient night time public transport, with the DLR not operating as an all-night service and only one-night bus servicing the south of the Royal Docks, between North Woolwich and Connaught Bridge only. Please see the IIA options assessment for further details. Silvertown is allocated in the Plan to function as a Local Centre, and may develop an evening and night time offer commensurate with this designation.										
	A change to this policy approach has not been made. An Evening and Night Time Economy Zone for Silvertown Local Centre was considered as an option in the IIA, but not taken forward for the following reasons. Firstly, Silvertown Local Centre is recommended to retain a Local Centre scale following assessment of need through the Retail and Leisure Study (2022), and there is no further evidence to suggest a larger Town Centre designation would be appropriate in this location under current needs and commercial property market conditions. Secondly, the Royal Docks area does not benefit from sufficient night time public transport, with the DLR not operating as an all-night service and only one night bus servicing the south of the Royal Docks, between North Woolwich and Connaught Bridge only. Please see the IIA options assessment for further details. Silvertown is allocated in the Plan to function as a Local Centre, and may develop an evening and night time offer commensurate with this designation.					HS5.1	HS5 Visitor Evening and Night Time Economy	High Street	Reg18-E-111/057	The Silvertown Partnership LLP	Reg18-E-111

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. We did not consider this change to be appropriate as the proportion is reflective of the need to balance evening and night time operation with the more residential context of Local Centres that requires safeguarding of residential amenity. The policy is clear that the proportion will only impact on hours of operation conditions, and will not prevent further uses in these categories to come forward, where appropriate, with their hours generally limited to lawful operation up to the hours of 23:00 (i.e. not requiring a Licence).						HS5.2	High Street	Reg18-E-111/058	The Silvertown Partnership LLP	Reg18-E-111
	This policy approach has now changed to allow for more flexibility, in line with NPPF and in the context of Use Class E. Please see the new wording in Policy HS5.						HS5.5	High Street	Reg18-E-111/059	The Silvertown Partnership LLP	Reg18-E-111
	Support noted.							High Street	Reg18-K-001/015	Abrdn	Reg18-K-001

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-D-001	Local Plan Drop-In	Reg18-D-001/123	High Street	HS6 Health and Wellbeing on High Street			HS6.1			Reducing hot food takeaways	The Local Plan addresses this topic through policy HS6, by limiting the concentration of hot food takeaways throughout the borough, and by promoting take up of healthy food standards. However, it cannot deliver the change you have requested as the planning system cannot dictate operational models of existing businesses. The Council's Public Health department are aware of the issues of access to quality, nutritious food in the borough and improving this is one of the key priorities of the 50 Steps to a Healthier Newham strategy. We have also shared your comments with the Public health department.
Reg18-E-066	Resident	Reg18-E-066/002	High Street	HS6 Health and Wellbeing on High Street						<p>Here are some additional thought.</p> <p>1. I fear that the positive changes can be undermined if Newham is not able to deal with the elephant in the room, which is a number of off licences masquerading as local convenience stores when they have licences to sell alcohol from the early morning of the day to people who are clearly addicted. This causes both anti-social behaviour and litter. Around each one of these shops there is a radius of anti social behaviour - to give some examples the one by Manor Park Station and the 'newsagent' on Romford Road at the junction of Clarence Road. I constantly litter pick beer cans, 250 ml vodka bottles, single shots spirits and fly away plastic bags. It is an endless stream. And this doesn't take into account the human misery of those addicted that is keeping these shops in business as well as local residents who have to sidestep</p>	<p>The Local Plan addresses the topic of safety and security through a range of policies, such as requiring developments to have proactively design in safety and security measures (see Policies D1, D2, D5, GWS1), and have Secure by Design accreditation (Policy D1). Planning obligations may also be sought to support physical policing infrastructure (Policy D2) and to build capacity in local partnerships addressing high streets safety coordination (Policy HS5).</p> <p>However, The Local Plan cannot deliver the change you have requested as off-licence shops cannot be separate in the planning system from other shop premises (as they are all the same Use Class) and therefore cannot be separately controlled through planning. These premises are controlled through Trading Standards and Licensing.</p>

Comment Response	<p>There is a Borough wide public space protection order (PSPO) in place. The order can be enforced appropriately should individuals drink alcohol in the street and act in an anti-social manner. Authorised Officers can ask for the alcohol to be surrendered, if refused, fixed penalty notices can be issued where appropriate. Also should individuals persistently drink and behave in an anti-social manner, fixed penalty notices can be issued where appropriate. Officers are also required to make necessary referrals to outreach services, such as, Change Grow Live (CGL) and Street Population, for individuals that are vulnerable, rough sleeping or living with addiction.</p> <p>The Council take all reports of noise and ASB seriously and will take appropriate steps to abate reported nuisances. There are also a number of different programs in place to reduce fly tipping on the Borough. Community Safety team work in partnership with Cleansing, Waste and Recycling, Housing, Private Rented Service, Greenspace, Neighbourhoods and Planning to tackle fly tipping and littering. Community Safety Enforcement Officers are authorised to investigate and enforce against all illegal waste dumping. Fixed penalty notices and prosecutions are used to address fly tipping and littering.</p> <p>Our colleagues in Community Safety Enforcement department and Trading</p>
Comment	faeces and men loitering or urinating in corners.
Implementation	
Justification	
Clause	
Introduction	
Site allocation	
Policy	
Chapter	
Comment Reference	
Representor	
Representation Reference	

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Standards and Licensing department may be able to help. We have also provided them with your comments.										
	<p>Comment noted. A commitment to improving the quality of food offer is already part of the development plan, through London Plan policy E9 Retail, markets and hot food takeaways, which seeks commitment to the Healthier Catering Commitment for London for any new approval hot food takeaways. Newham suffers disproportionately with an overconcentration of such uses, many of them providing food with low nutritional value. This is also evident from the on-going request from residents to tackle the spread and quality of hot food takeaways across the borough. As part of Newham's 50 Steps to a Healthier Newham strategy, the council is committed to tackling this problem, and the policy is a reflection of this. Collaboration across the planning and health teams are underway and will enable conditions to be co-monitored and enforced.</p>		<ul style="list-style-type: none"> Page.113 (2). Justification related to tackling over concentration of uses is well established in planning. In this Draft Plan however there are objectives which go beyond planning remit and are unenforceable via planning legislation. This includes reference to Healthier Catering Commitment for London accreditation. Council should seek legal opinion on this as to whether this is enforceable as well as (4) enforcing establishments to sign-up to relevant industry standards in terms of healthy foods. This needs to be interpreted in light of material considerations such as the National Planning Policy Framework, guidance on the use of conditions, and relevant case law. 	HS6.2			HS6 Health and Wellbeing on High Street	High Street	Reg18-E-082/037	Resident	Reg18-E-082

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-082	Resident	Reg18-E-082/038	High Street	HS6 Health and Wellbeing on High Street				3.78 and 3.79		<ul style="list-style-type: none"> Page.114 (3.78 and 3.79). Critical to note that planning can only determine use class orders, it cannot determine what type of food is served in those establishments, whether this is healthy or unhealthy. Whilst there have been restrictions on A5 uses since 2016, there continues to be new fried food establishments emerging in the borough. Planning review process is required as to why this is and how this is monitored and how the policy is enforced. 	A change to this policy approach has not been made. We did not consider this change to be necessary as monitoring of the existing policy has demonstrated it is effective. The Local Plan continues to address this topic through policy HS6, by limiting the concentration of hot food takeaways throughout the borough, and by now also promoting take up of healthy food standards. However, it cannot deliver the change you have requested as the planning system cannot dictate operational models of existing businesses. The Council's Public Health department are aware of the issues of access to quality, nutritious food in the borough and improving this is one of the key priorities of the 50 Steps to a Healthier Newham strategy. We have also shared your comments with the Public Health team
Reg18-E-002	Resident	Reg18-E-002/008	High Street	HS6 Health and Wellbeing on High Street						Why not be less encouraging to businesses that are opposed to the good of the planet? Such as fast food and non nutritious outlets	The Local Plan addresses this topic through policy HS6, by limiting the concentration of hot food takeaways throughout the borough, and by promoting take up of healthy food standards. However, it cannot deliver the change you have requested as the planning system cannot dictate operational models of existing businesses. The Council's Public Health department are aware of the issues of access to quality, nutritious food in the borough and improving this is one of the key priorities of the 50 Steps to a Healthier Newham strategy. We have also shared your comments with the Public health department.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-002	Resident	Reg18-E-002/009	High Street	HS6 Health and Wellbeing on High Street						To tell people to 'eat healthy' while there are so few plant based places, none that have the kudos of McDonalds (or the majority of places) for children's treats, a family meal out etc, is not rational.	The Local Plan addresses this topic through policy HS6, by limiting the concentration of hot food takeaways throughout the borough, and by promoting take up of healthy food standards. However, it cannot deliver the change you have requested as the planning system cannot dictate operational models of existing businesses. The Council's Public Health department are aware of the issues of access to quality, nutritious food in the borough and improving this is one of the key priorities of the 50 Steps to a Healthier Newham strategy. We have also shared your comments with the Public health department.
Reg18-E-002	Resident	Reg18-E-002/025	High Street	HS6 Health and Wellbeing on High Street						Please, let's also see banning of fast food outlets and betting shops	The Local Plan addresses this topic through policy HS6 which restricts overconcentration of gambling premises and hot food takeaways across the borough. However, it cannot be applied retrospectively to existing lawfully established premises, nor can the Plan lawfully apply a blanket ban on specific uses.
Reg18-E-002	Resident	Reg18-E-002/031	High Street	HS6 Health and Wellbeing on High Street						Not allowing rubbish food outlets and in their stead having plant based tasty meals and snacks will do the same.	The Local Plan addresses this topic through policy HS6, by limiting the concentration of hot food takeaways throughout the borough, and by promoting take up of healthy food standards. However, it cannot deliver the change you have requested as the planning system cannot dictate operational models of existing businesses. The Council's Public Health department are aware of the issues of access to quality, nutritious food in the borough and

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	improving this is one of the key priorities of the 50 Steps to a Healthier Newham strategy. We have also shared your comments with the Public health department.										
	Comment noted. However, the Local Plan cannot deliver the change you have requested as there are no evidenced health, safety or amenity impacts resulting from retail units not displaying pricing. This would not be possible to monitor and enforce at scale, in the context of the broad Use Class E. Our colleagues in Trading Standards department may be able to help. We have also provided them with your comments.	p113 HS6 3a: Various types of premises ideally should be made to display certain information on the window, eg those offering photocopying should say how much a sheet of A4 costs. I didn't know councils had the power to do this! Can it be specified for any category? Could it even be retrospective?				HS6.3	HS6 Health and Wellbeing on High Street	High Street	Reg18-E-090/007	Resident	Reg18-E-090
	Support noted.	Support - betting shops and casinos are bad for the borough.					HS6 Health and Wellbeing on High Street	High Street	Reg18-K-003/010a	Resident	Reg18-K-003

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-002	Resident	Reg18-T-002/016	High Street	HS6 Health and Wellbeing on High Street						[Please provide any comments and feedback on the *Section 1: All about Newham*.] it is impossible to get clean and healthy food anywhere,	The Local Plan addresses this topic through policy HS6, by limiting the concentration of hot food takeaways throughout the borough, and by promoting take up of healthy food standards. However, it cannot deliver the change you have requested as the planning system cannot dictate operational models of existing businesses. The Council's Public Health department are aware of the issues of access to quality, nutritious food in the borough and improving this is one of the key priorities of the 50 Steps to a Healthier Newham strategy. We have also shared your comments with the Public health department.
Reg18-T-002	Resident	Reg18-T-002/017	High Street	HS6 Health and Wellbeing on High Street						[Please provide any comments and feedback on the *Section 1: All about Newham*.] and few families want to spend anytime walking around the local area. Most people I know just leave the area on weekends and spend their money and time in Wanstead, Leytonstone, East Village, for example, because they can't get what they want for their families here. It's just betting shops, greasy fast food chicken shops and awful shops with nasty signage everywhere.	The Local Plan addresses this topic through policy HS6, by limiting the concentration of hot food takeaways and gambling premises throughout the borough, and by promoting take up of healthy food standards. However, it cannot deliver the change you have requested as the planning system cannot dictate operational models of existing businesses. The Council's Public Health department are aware of the issues of access to quality, nutritious food in the borough and improving this is one of the key priorities of the 50 Steps to a Healthier Newham strategy. We have also shared your comments with the Public health department.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
							HS6 Health and Wellbeing on High Street	High Street	Reg18-T-002/059	Resident	Reg18-T-002
	A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan set out a vision for each town centre as part of the Neighbourhood policies, where there is the evidence to do so. These locally specific policies work with the more generic high street policies to address development in a way that is respectful of and aspirational for the local area while also meeting national requirements and responding to broad trends affecting all high streets. We also work with colleagues in Regeneration who play a more active role in making improvements on high streets. However, the Local Plan cannot deliver the change you have requested, as the planning system cannot direct what goods or services markets provide. We have also provided our Regeneration and Newham Markets colleagues with your comments.										
							HS6 Health and Wellbeing on High Street	High Street	Reg18-T-026/010	Resident	Reg18-T-026
	The Local Plan addresses this topic through policy GWS1, and by supporting enhancement and activation of the public realm of high streets through policies HS2 and D2. However, the Local Plan cannot be specific about requiring this type of equipment on high streets. No additions have been made.										

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>[Add to it] Make the pavements cleaner and brighter so that every feels safe to walk on them. No dark corner.</p> <p>A change to this policy approach has not been made. We did not consider this change to be necessary the Local Plan addresses the topic of cleanliness through design principles and through waste management policies that should help provide environments that people want to take care of and it is easy to appropriately dispose of waste. The plan also addresses the topic of street lighting through the transport policies and design policies D2 and D5. However, it cannot deliver the change you have requested.</p> <p>There are a number of different programs in place to reduce fly tipping on the Borough. Community Safety team work in partnership with Cleansing, Waste and Recycling, Housing, Private Rented Service, Greenspace, Neighbourhoods and Planning to tackle fly tipping and littering. Community Safety Enforcement Officers are authorised to investigate and enforce against all illegal waste dumping. Fixed penalty notices and prosecutions are used to address fly tipping and littering. Our colleagues in Community Safety Enforcement department may be able to help. We have also provided them with your comments.</p> <p>The Council has recently completed a programme of replacing street lighting with more energy efficient and longer lasting LEDs. You can report any issues with street lighting – such as lights not working, or dark areas – on our website here.</p>						HS6 Health and Wellbeing on High Street	High Street	Reg18-T-026/011	Resident	Reg18-T-026

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	https://www.newham.gov.uk/transport-streets/new-roads-pavements/2 Highways will inspect the problem within two working days and carry out any repairs that are the Council's responsibility within 28 days. We have provided the highways team with your comments.										
	A change to this policy approach has not been made. We did not consider this change to be necessary as policy HS2 already supports the delivery of an enhanced public realm within high streets, supported by other policies of this plan including D2 addressing public realm quality and management broadly, policy HS4 supporting provision of new markets, and policies of the Green and Water Space chapter. However, the Local Plan cannot prescribe particular solutions to specific sites. We work in partnership with Highways and Regeneration departments, who undertake such projects on a regular basis, and we have also provided them with your comments.	[Add to it] Large space in front of Manor Park Library is not fully utilised. Missing, benches, green spaces, market stalls,					HS6 Health and Wellbeing on High Street	High Street	Reg18-T-026/012	Resident	Reg18-T-026

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-034	Resident	Reg18-T-034/019	High Street	HS6 Health and Wellbeing on High Street						[Add to it] Shift the balance towards walking and cycling and away from vehicle transport.	A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan already promotes a shift away from vehicle transport and towards active travel through a range of policies, including the Transport chapter policies, policy D2, and policies HS2 and HS7.
Reg18-T-034	Resident	Reg18-T-034/020	High Street	HS6 Health and Wellbeing on High Street						[Add to it] Create green spaces, add trees to improve air quality and offer shade.	A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan addresses this topic through a range of policies, including policy HS2 which requires the public realm of high streets to be enhanced by development, policy D2 which promotes greening of the public realm across the borough, and the policies of the Green and Water Spaces chapter. The policies work together to help deliver the change you have requested. No additions have been made to policy HS6.
Reg18-T-058	Resident	Reg18-T-058/005	High Street	HS6 Health and Wellbeing on High Street						[Please provide any comments and feedback on the *Introduction*.] less gambling shops,	The Local Plan addresses this topic through policy HS6 which restricts overconcentration of gambling premises across the borough. However, it cannot be applied retrospectively to existing lawfully established gambling premises.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
									Reg18-T-058/011	Resident	Reg18-T-058
	The Local Plan addresses this topic through policy HS6 which restricts overconcentration of gambling premises across the borough. However, it cannot be applied retrospectively to existing lawfully established gambling premises.						HS6 Health and Wellbeing on High Street	High Street			
									Reg18-T-058/026	Resident	Reg18-T-058
	The Local Plan addresses this topic through policy HS6 which restricts overconcentration of gambling premises across the borough. However, it cannot be applied retrospectively to existing lawfully established gambling premises.						HS6 Health and Wellbeing on High Street	High Street			
									Reg18-T-065/006	Resident	Reg18-T-065
	The Local Plan addresses this topic through policy HS6, by limiting the concentration of hot food takeaways throughout the borough, and by promoting take up of healthy food standards. However, it cannot deliver the change you have requested as the planning system cannot dictate operational models of existing businesses. The Council's Public Health department are aware of the issues of access to quality, nutritious food in the borough and improving this is one of the key priorities of the 50 Steps to a Healthier Newham strategy. We have also shared your comments with the Public health department.						HS6 Health and Wellbeing on High Street	High Street			

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
							HS6 Health and Wellbeing on High Street	High Street	Reg18-T-069/024	Resident	Reg18-T-069
	The Local Plan addresses this topic through policy HS6, by limiting the concentration of hot food takeaways and gambling premises throughout the borough, and by promoting take up of healthy food standards. However, it cannot deliver the change you have requested as the planning system cannot dictate operational models of existing businesses. The Council's Public Health department are aware of the issues of access to quality, nutritious food in the borough and improving this is one of the key priorities of the 50 Steps to a Healthier Newham strategy. We have also shared your comments with the Public health department.										
							HS6 Health and Wellbeing on High Street	High Street	Reg18-T-098/013	Resident	Reg18-T-098
	A change to this policy approach has not been made. We did not consider a change to be necessary as the Local Plan addresses this topic through a range of policies, including policy HS2 which requires the public realm of high streets to be enhanced by development, policy D2 which promotes greening of the public realm across the borough, and the policies of the Green and Water Spaces chapter. The policies work together to help deliver the change you have requested. No additions have been made to policy HS6.										

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	A change to this policy approach has not been made. We did not consider a change to be necessary as the Local Plan addresses this topic through a range of policies, including policy HS2 which requires the public realm of high streets to be enhanced by development, policy D2 which promotes greening of the public realm across the borough, and the policies of the Green and Water Spaces chapter. The policies work together to help deliver the change you have requested. No additions have been made to policy HS6.						HS6 Health and Wellbeing on High Street	High Street	Reg18-T-098/014	Resident	Reg18-T-098
	A change to this policy approach has not been made. We did not consider a change to be necessary as the Local Plan addresses the need for additional health facilities through the Social Infrastructure chapter policies and by requiring new or expanded facilities on site allocations where partnership working with the NHS/NCCG has indicated there is scope to deliver new health centres. Policy HS1 has also been amended to provide additional flexibility in the scale of new units to support locating social infrastructure uses in local centres and neighbourhood parades, where they meet other criteria of policies SI1-4.						HS6 Health and Wellbeing on High Street	High Street	Reg18-T-103/016	Resident	Reg18-T-103

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-105	Resident	Reg18-T-105/007	High Street	HS6 Health and Wellbeing on High Street						[Keep it]	Support noted.
Reg18-E-111	The Silvertown Partnership LLP	Reg18-E-111/060	High Street	HS6 Health and Wellbeing on High Street						[Appendix A] The principle of supporting health and wellbeing through land use control is supported.	Support noted.
Reg18-E-111	The Silvertown Partnership LLP	Reg18-E-111/061	High Street	HS6 Health and Wellbeing on High Street			HS6.1			[Appendix A] However, with reference to hot food takeaways there is some concern regarding a 'one size fits all approach' in relation to the location and concentration of such uses. While it is expected that the proposals for Silvertown would generally comply with this draft policy, a small hot food takeaway allowance is sought, and it is considered to contribute to the placemaking strategy for the site. Hot food takeaways are not automatically unhealthy, and Silvertown may attract hot food takeaway businesses offering healthy food in line with the Healthy	The policy approach has changed in response to comments received from Newham Public Health and further assessment of the evidence base. Please see revised wording in policy HS6. Your comments have not resulted in a change to this policy, as there is substantial evidence of the health impacts resulting from over-concentration of hot food takeaways in Newham, including comments received from residents and the evidence behind the 50 Steps to a Healthier Newham corporate strategy. Any proposal for hot food takeaway uses at Silvertown will be considered against the spatial strategy set out, and may be acceptable

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	Catering Commitment (or similar Accreditation).										
	if it does not lead to an over-concentration of such uses and if the quality of criteria is met.										
	[Keep it] Strengthen it										
	Support noted. The policy has changed to strengthen the concentration criteria for uses subject to control, following review of the evidence base. Please see revised wording in policy HS6.										
	Support for delivery-led businesses We support Policy HS7: Delivery-led businesses recognising changing consumer behaviours and the growth of the e-commerce sector, where proposals for new or intensified 'micro-fulfilment centres' are prioritised on Local Industrial Land.										
	Support noted.										

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	<p>The Local Plan addresses this topic through the transport policies, however it cannot deliver the change you have requested.</p> <p>The London Borough of Newham currently has five permanent Low Traffic Neighbourhoods (LTNs), as well as potential LTN in Woodgrange and Capel, and exploration of options to create more people-friendly streets in the West Ham Park area. There are also a number of historic planned-in LTNs (e.g. could de sacs).</p> <p>A Low Traffic Neighbourhood is predominantly residential area that is bounded by main roads, in which a set of modal filters has been installed to prevent motor vehicles from using the residential area as a shortcut. Excess motor vehicle traffic in residential areas causes noise, road danger and pollution; and creates a poor environment for walking and cycling. LTNs aim to improve street environments and local neighbourhoods for walking and cycling by reducing traffic volumes, improving the quality of life for local residents, and making it easier for residents to choose walking or cycling for local journeys. Active travel is also encouraged by the transport policies and by policy HS7 for undertaking last mile, short distance deliveries.</p> <p>LTNs are enforced by automatic number plate recognition (ANPR) camera and non-exempt motor vehicles driving through them will receive a Fixed Penalty Notice (FPN). These operate 24 hours per day, 7 days per week. All addresses can be reached in and amongst LTNs</p>						HS7 Delivery-led businesses	High Street	Reg18-T-065/005	Resident	Reg18-T-065

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	without receiving an FPN, although routes may differ to avoid modal filters. Pedestrians, cyclists and wheelchair users can go through modal filters unrestricted. More information about Low Traffic Neighbourhoods in Newham is available on the Newham LTN web page: https://www.newham.gov.uk/transport-streets/low-traffic-neighbourhood We have provided the highways team with your comments										
	A change to this policy approach has not been made. We did not consider this change to be necessary as the policy provides further flexibilities and more clarity to direct the operation of delivery-led businesses while ensuring adequate consideration of the needs of, often third-party hire, delivery drivers/cyclists. The policy creates a positive strategy to the growth of this economic sector.	[Change it] It shouldnt be so strict as delivery drivers are trying to earn a living too					HS7 Delivery-led businesses	High Street	Reg18-T-096/005	Resident	Reg18-T-096
	This policy approach has now changed to clarify the intended approach to the location of delivery-led businesses, which is more flexible than a sequential approach. Please see the new wording in Policy HS7.	POLICY HS7: DELIVERY LED BUSINESSES Part 2a-c of Policy HS7 sets out a sequential approach to the location of new or intensified 'micro fulfilment centres' which prioritises sites in the following order: 1 Strategic Industrial Land, Local Industrial Land and Local Mixed Use Areas; 2 Retail parks or other non-designated sections of high streets; then 3 Areas within Town or Local Centres outside of the Primary Shopping Area.				HS7.2a-c	HS7 Delivery-led businesses	High Street	Reg18-E-110/021	Sainsbury's Supermarkets Ltd	Reg18-E-110

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		The imposition of a sequential approach for a B8 use does not align with paragraph 83 of the NPPF which requires planning policy to recognise and address the specific locational requirements of different sectors. The purpose of micro-fulfilment centres is to be close and convenient to the communities that they serve. Therefore, requiring operators to first look at SIL/LIL/LMUA land rather than assess the merits of proposals on a case-by-case basis, is an unhelpful approach.									
	A change to this approach has not been made as, where the unit functions as a retail use, policy HS7 does not apply. Instead, Policy HS3 is relevant to out of centre retail floorspace. However, the policy implementation wording has changed to recognise that a retail Impact Assessment is not applicable to microfulfilment centres, and to address potential confusions between drop of and pick up of parcels service and click and collect facilities. The value of such customer-facing facilities for generating linked trips is recognised and encouraged on microfulfilment sites located within Town and Local Centres, in line with the town centre first approach, and discouraged elsewhere. Please see new wording in policy HS7.	Draft Policy HS7 part 2(d) requires delivery-led businesses outside a centre to provide a Retail Impact Assessment if click and collect facilities are proposed. 'Click and Collect' facilities are an important part of Sainsbury's business model, and they are common in stores across their estate. This restriction is simply not practical. If an item is purchased online, it would be futile to try and estimate how this expenditure would impact a town centre. If someone is ordering online, in most cases they will have no idea where the goods are delivered from. This policy also ignores the 'bricks and clicks' strategy of many retailers. The idea is well established that a retailer can use traditional bricks and mortar as a 'showroom' to help drive improved brand awareness thus further supporting the promotion and growth of their online sales. It also overlooks the sustainability benefits of click and collect. It means that shoppers can pick-up an item as		HS7.2d			HS7 Delivery-led businesses	High Street	Reg18-E-110/022	Sainsbury's Supermarkets Ltd	Reg18-E-110

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		part of a linked trip and takes a home delivery off the road.									
	A change to this approach has not been made as, where the unit functions as a retail use, policy HS7 does not apply. Instead, Policy HS3 is relevant to out of centre retail floorspace. However, the policy implementation wording has changed to recognise that a retail Impact Assessment is not applicable to microfulfilment centres, and to address potential confusions between drop of and pick up of parcels service and click and collect facilities. The value of such customer-facing facilities for generating linked trips is recognised and encouraged on microfulfilment sites located within Town and Local Centres, in line with the town centre first approach, and discouraged elsewhere. Please see new wording in policy HS7.	It would be impossible to require a retail impact assessment for a click and collect facility that is ancillary to the main retail function of a store. The policy may be able to apply to standalone collection facilities, although this is doubtful, and it cannot be applied to existing retail stores. Therefore, we object to this criterion within Draft Policy HS7.		HS7.2d			HS7 Delivery-led businesses	High Street	Reg18-E-110/023	Sainsbury's Supermarkets Ltd	Reg18-E-110

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	that Silvertown could host industrial uses (as referred to in the draft site allocation).										
	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.							High Street	Reg18-E-095/018	Transport for London	Reg18-E-095
	[Keep it]							High Street	Reg18-T-104/003	Works in borough	Reg18-T-104

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
							HS8.3			London Legacy Development Corporation	Reg18-E-052
	The policy implementation text has now changed to refer to additional inclusive design guidance provided in policies D1, D2 and D5 (formerly D6), which together address inclusive design standards on private and within public space. Please see the new wording in the implementation section of Policy HS8.						HS8 Visitor accommodation	High Street	Reg18-E-052/099		
	This policy implementation approach has now changed to clarify the need for visitor accommodation uses to consider their amenity and safety impacts and work proactively to mitigate these through the design of the scheme and the operation of the site post-delivery, and in line with requirements of the wider Plan. Please see the new wording in policy HS8 Implementation section. However, the policy cannot be applied retrospectively.						HS8 Visitor accommodation	High Street	Reg18-T-002/060	Resident	Reg18-T-002
	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. No additions have been made.						HS8 Visitor accommodation	High Street	Reg18-T-082/005	Resident	Reg18-T-082

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
							HS8.1b			Royal Docks	Reg18-E-092
	HS8(1b) – in order to provide sufficient flexibility and enable appropriate master-planning, we would suggest a longer walking distance from ExCeL of 20minutes and to also allow visitor accommodation within a similar distance from London City Airport.						HS8 Visitor accommodation	High Street	Reg18-E-092/023		
	This wording change has not been made. We did not consider this change to be appropriate as 15minutes is in keeping with the 15minuted neighbourhood concept that is threaded throughout the plan. There is no justification to extend this in the case of the ExCel conference centre. LCY sits within 15min of existing and future local centres, and new visitor accommodation should be directed to these.										
										Stratford and West Ham Assembly	Reg18-As-001
	[Change] Too many bed and breakfasts cause great population churn so please clamp down on them and reduce the number of B&Bs. A big problem for Romford Road						HS8 Visitor accommodation	High Street	Reg18-As-001/181		
	A change to this policy approach has not been made. We did not consider this change to be necessary as the policy already seeks to control the location and overall quantum of new visitor accommodation proposals, in line with the London Plan requirements. Other policies of this plan also provide standards to manage transport and amenity impacts, which are addressed as part of an application. However, the Local Plan cannot impose standards on existing lawful uses, or cause these to stop operating.										
										Resident	Reg18-E-082
	• Page.21 (Town/local centre map). Outlined town boundaries and local centres do not align with actual realities on the ground. This again emphasis the critical of role of effective community engagement, genuine and open interactions. For instance, Green Street district centre is effectively the whole of Green Street starting from Barking Road to Romford Road, it is similar in East Ham (Town Centre) in terms of High Street North. Further as both Green Street and East Ham are comparable busy shopping precincts, it						Key diagram	Vision and objectives	Reg18-E-082/021		
	A change to this policy approach has not been made. We did not consider this change to be appropriate as the policy addresses designations within Newham's Town Centres Network, in line with NPPF and London Plan (2021) requirements. All designations play an important role in servicing local communities due to their location. Both Green Street and East Ham are town centres. The London Plan goes on to differentiate between town centres based on their scales, function and catchment, and these result in the additional designations										

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	of District or Major (or Metropolitan) town centre. The Local Plan provides the opportunity to re-assess the function of Newham's centres as part of the evidence base work. In this case, the Newham Retail and Leisure Study identified that our town centres continue to function at the scale designated in the London Plan, and with the exception of Stratford, do not show potential to scale up (or down) to a different scale of town centre. This means that Newham's network is functioning well and is well balanced. Many of Newham's key routes, like Green Street, Barking Road and High Street North, have evolved as historic trade routes, with shopfronts along most of their length. While we recognise that these high streets offer opportunities to local people (see GLA research on the social value of high streets, High Streets for All Report, 2017, https://www.london.gov.uk/sites/default/files/high_streets_for_all_report_web_final.pdf), it does not make economic sense to designate and protect all sections of these streets. As part of the review of Newham's town centre network, we've designated significantly more frontages of high streets, as Local Centres or Neighbourhood Parades. These sections were identified as the most suitable for protection following assessment against policy aspirations for the network and the high street health check criteria set out in the methodology paper. Retail premises within designated areas will be protected, while sections outside of this										
	does not make sense for one to be a district centre and other to be a town centre.										

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	must continue to follow the nationally set 'town centre first approach', unless it meets exemptions criteria set out in draft policy HS3.										
	Comment noted.	0.3. HIGH STREETS No comment						High Street	Reg18-E-070/063	Aston Mansfield	Reg18-E-070
	Support noted.	High Streets HS1 - HS8 We are particularly pleased to see the facilitation of the 15-minute city referenced, as this is one of the London Borough of Waltham Forest's key strategic objectives. In the current climate, there is also much to be commended about having a policy approach which effectively manages a changing retailing environment and captures the differing characters of each of Newham's town centres and neighbourhoods. We are encouraged to see High Street and Town Centre policies being developed to help						High Street	Reg18-E-134/010	London Borough of Waltham Forest	Reg18-E-134

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		address key issues faced by Newham, such as health issues and the prevalence of “dark kitchens”.									
	Comment noted.	It is vital that communities that wish to have neighbourhood plans are allowed to do so, having neighbourhood plans can ensure greater focused community involvement along with detailed focus on local needs which cannot be achieved via the Local Plan.						High Street	Reg18-E-082/033	Resident	Reg18-E-082
	This wording change has not been made as the housing quality criteria of the plan will apply equally to conversions from Class E to residential as for all other types of housing development, ensuring it provides a suitable healthy environment for habitation. The Local Plan cannot be used in decisions for prior approval of permitted development. The Council therefore centres to monitor the take-up and impacts of the permitted development rights in Newham, and should there be sufficient evidence, in line with the NPPF, the implementation of Article 4 Directions for parts of the borough may be considered.	<ul style="list-style-type: none"> Page.86. Article 4 Direction (A4D) is part of planning legislation that allows the Council to remove permitted development rights including changes of use in an area. Conversion of Class E uses into residential should be prohibited unless there are exceptional circumstances. This is based on health and wellbeing grounds as most commercial premises are usually not suitable for conversion, in particular in context of available light, soundproofing, build-up of heat and ventilation during periods of extreme heat.						High Street	Reg18-E-082/035	Resident	Reg18-E-82

