

Design Comments

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-K-001	Abrdn	Reg18-K-001/008	Design	D1 Design Standards						Policy D1: Design Standards – Abrdn support the principle of good design.	Support noted
Reg18-K-001	Abrdn	Reg18-K-001/009	Design	D1 Design Standards						The development at Gallions Reach (site N1) can be sensitively designed to create a well-integrated community which is an appropriate scale, mass and layout for the site and surroundings	Comment noted.
Reg18-E-050	Anchor	Reg18-E-050/023	Design	D1 Design Standards			D1.5			The requirement to retain an architect throughout the life of a project would prevent developers from obtaining best value. This policy is not justified or effective.	This policy approach has now changed to allow for more flexibility on the method of retaining architect oversight. Please see the new wording in policy D1 Design Standards.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This wording change has been made. Please see the new wording in policy D1.	0.2 DESIGN a. D1: Design Standards - Would you keep, change or add something to this policy? <i>1. All developments should have regard to the Newham Characterisation Study (2022) and an further, relevant Council-led design guidance and/or code and apply the following qualities of good design: a. creates well integrated developments which connect into and appear part of their wider natural and built surroundings. Avoid creating gated communities or isolated and disconnected places that are not easy to move through and around. [...] Parts 1a and 2 introduce unnecessary duplication. Suggested change to wording: a. create well integrated developments which connect into and appear part of their wider natural and built surroundings. Avoid creating gated communities or isolated and disconnected places that are not easy to move through and around and consider opportunities to correct less successful urban forms, movement barriers and other local challenges</i>		D1.1a			D1 Design Standards	Design	Reg18-E-070/052a	Aston Mansfield	Reg18-E-070

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This wording change has been made. Please see the new wording in policy D1.	2. All developments should be welcoming and well integrated socially and physically into their neighbourhoods. They should enhance existing positive elements of local character and carefully consider opportunities to correct less successful urban forms, movement barriers and other local challenges. [Parts 1a and 2 introduce unnecessary duplication. Suggested change to wording:] 2. All developments should [delete: be welcoming and well integrated socially and physically into their neighbourhoods. They should] enhance existing positive elements of local character [delete: and carefully consider opportunities to correct less successful urban forms, movement barriers and other local challenges.]			D1.2		D1 Design Standards	Design	Reg18-E-070/052b	Aston Mansfield	Reg18-E-070

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted	Ballymore supports the delivery of high quality developments which are welcoming and well-integrated socially and physically into their neighbourhoods, this is something Ballymore strive to achieve across all their sites. However, we do have concerns over the prescriptive nature of some of the requirements of this draft policy:					D1 Design Standards	Design	Reg18-E-077/005	Ballymore Group	Reg18-E-077

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed to provide more flexibility to site-specific constraints. Please see the new wording in policy D1 Design Standards and its implementation guidance.	<p>Firstly, Part 1(i) of the draft policy requires plant to be located below ground, and where this is not feasible, it should be satisfactorily integrated into the form and design of the roof. Ballymore object to this requirement – the ground excavation required to provide a basement or lower ground floor within a building is incredibly expensive and can often impact the wider viability and deliverability of a scheme, particularly across strategic sites which contain multiple buildings. While we understand the Council’s desire to ensure plant is well integrated into schemes to minimise blank facades at street level, there are alternative ways of securing this than plant being located below ground which would still achieve the Council’s ambitions for discreet plant without impacting on the viability and deliverability of a scheme. Further, this requirement doesn’t seem to recognise that plant often requires ventilation which cannot always be achieved at basement or lower ground floor level. There are also competing demands for roof space within major developments, including the provision of PVs, biodiverse roofs and communal amenity space, all of which restrict the space at roof level available for plant. It is therefore not reasonable to assume a significant area of roof (if not all) could be given away to</p>		D1.1i			D1 Design Standards	Design	Reg18-E-077/006	Ballymore Group	Reg18-E-077

Comment Response	
Comment	<p>provide plant space.</p> <p>The majority of development sites along the waterfront in Newham also need to address flood risk constraints and often deal with this by raising the site levels by 3 or 4 metres. The allocation of plant and other uses therefore need to work with this constraint to ensure a successful development.</p>
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
	This wording change has been made. Please see the new wording in policy D1 Design Standards.	Part 5 of the draft policy requires retention of the original scheme architects through to completion of a development. Ballymore strongly object to this requirement. While we support desire to ensure a high standard of design quality is carried through to the detailed design and construction phase, this requirement promotes anti-competition across architects. There are other successful ways to secure design quality through to construction, notably through the use of planning conditions (e.g. detailed drawings and studies of certain aspects of a building, as well as physical samples of materials). As recognised within the draft policy presentation of schemes to the Council's DRP also helps to secure design quality. It should also not be forgotten that any changes to an approved scheme must first be approved by the Council through either NMA or S73 applications. The same objective could also be achieved by giving the Concept/Masterplan Architect the 'Design Guardian' Role during the construction phase of a project. This has been successfully achieved on our Royal Wharf and Deanston Wharf schemes where Glenn Howells Architects took the role of the Design Guardian working alongside the delivery architects. For these reasons it is not considered		D1.5			D1 Design Standards	Design	Reg18-E-077/007	Ballymore Group	Reg18-E-077

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		reasonable or necessary to require the retention of the same architect, particularly when there is no shortage of award winning architects across London.									
	Draft Policies D1 (Design Standards) and D2 (Public realm net gain) sets out the principles which will guide well-designed development within the Borough including where new or refurbished public realm is proposed as part of development proposals. These draft policies are supported, in particular the need to deliver new public realm						D1 Design Standards	Design	Reg18-E-148/012	City of London	Reg18-E-148
	Support noted										

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		floorspace which reflects and complements the built and natural character and history of the site's immediate context and wider neighbourhood.									
	A change to this policy approach has not been made. We did not consider this change to be appropriate as the specific context of Newham is not fully reflected in the policies and guidance of the London Plan.	Policy D1 should refer to the requirements of the London Plan and accompanying supplementary planning guidance to ensure they are not overly prescriptive.					D1 Design Standards	Design	Reg18-E-130/068	Hadley Property Group	Reg18-E-130
	This wording change has not been made. We did not consider this change to be appropriate as policy D1 provides broader principles of design that also apply to non-residential developments and householder developments.	The policy should also make clearer that development should follow a design-led approach to optimising the use of land, in accordance with Policies BFN1 and D3					D1 Design Standards	Design	Reg18-E-130/069	Hadley Property Group	Reg18-E-130
	This policy approach has now changed to provide more flexibility to site-specific constraints. Please see the new wording in policy D1 Design Standards and its implementation guidance.	For example, with regard to Part D1.1(i), Hadley requests flexibility over the location of plant equipment to ensure buildings can be designed well without significant constraints that impact the delivery of other requirements, such as the need to excavate costly basements. Hadley suggests that the policy is changed to enable flexibility in the location of plant space so long as the visual and environmental impact has been adequately tested.			D1.1.i		D1 Design Standards	Design	Reg18-E-130/070	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 on the method of retaining architect oversight. Please see the new wording in policy D1 Design Standards.			D1.5			D1 Design Standards	Design	Reg18-E-130/072	Hadley Property Group	Reg18-E-130
	Support noted.						D1 Design Standards	Design	Reg18-E-147/003	Historic England	Reg18-E-147
	This wording change has been made. Please see the new wording in Implementation section of Policy D1.	D1.5					D1 Design Standards	Design	Reg18-E-147/018	Historic England	Reg18-E-147

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-096	L&Q	Reg18-E-096/006	Design	D1 Design Standards			D1.1i			As currently written, Policy D1 is very prescriptive. Policy D1.1(i) requires plant to be located below ground in the first instance. Such a requisite would require the building of a basement, which would unnecessarily add substantial costs to most schemes. We propose this is removed from the policy.	This policy approach has now changed to provide more flexibility to site-specific constraints. Please see the new wording in policy D1 Design Standards and its implementation guidance.
Reg18-E-096	L&Q	Reg18-E-096/007	Design	D1 Design Standards			D1.5			We are also concerned by part 5 of the policy requiring the retention of the planning stage architect to completion stage. This is likely to lead to a lack of competition when tendering building contracts for the development, and subsequently cause an impact on the overall viability of the development. If this is retained in policy, we suggest that a change in architect is allowed provided the developer notifies the Council in writing.	This policy approach has now changed to allow for more flexibility on the method of retaining architect oversight. Please see the new wording in policy D1 Design Standards.
Reg18-E-135	London Borough of Redbridge	Reg18-E-135/004	Design	D1 Design Standards						We would support the use of a Young People Design Review Panel and opportunities to actively encourage a youth-led perspective into the design process, as previously suggested.	Support noted.
Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/023	Design	D1 Design Standards						Policy D1: Design standards. The policy approach is supported	Support noted

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/024	Design	D1 Design Standards			D1.1			[Policy D1: Design standards.] but additional policy text is sought to recognise and require adherence to existing and future scheme specific design codes, such as those which accompany LLDC development schemes.	This wording change has not been made. We did not consider this change to be necessary as the aspirations and standards for quality of design between the draft policy and the LLDC Local Plan are aligned. Support for scheme-specific design codes is already signalled through the implementation section, including planning obligations where reasonable.
Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/063	Design	D1 Design Standards						The approach within the policy overall is welcomed and supported.	Support noted
Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/064	Design	D1 Design Standards					D1.1	However, it should also be recognised that in many cases design standards are incorporated within extant planning permissions. This is the case in many major schemes in the LLDC MDC area and recognition that these will apply would be welcomed.	This wording change has not been made. We did not consider this change to be necessary as the aspirations and standards for quality of design between the draft policy and the LLDC Local Plan are aligned. Support for scheme-specific design codes is already signalled through the implementation section, including planning obligations where reasonable.
Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/065	Design	D1 Design Standards					D1.1	Similarly, recognition of the role of scheme specific design codes such as those which apply to major LLDC schemes would be welcomed as would an addition to the policy that require adherence to approved scheme specific design codes.	This wording change has not been made. We did not consider this change to be necessary as the aspirations and standards for quality of design between the draft policy and the LLDC Local Plan are aligned. Support for scheme-specific design codes is already signalled through the implementation section, including planning obligations where reasonable.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/066	Design	D1 Design Standards					D1.1	It would be helpful to see reference to and recognition of the LLDC Design Quality Policy 2018; Inclusive Design Standards 2019, which are specifically reference in policy in the LLDC Local Plan, and to the QEOP Park Design Guide, that are considered to represent best practice.	This policy approach has now changed to include additional references to inclusive and active design standards, making use of nationally available best practice guidance and the LLDC inclusive Design Standards 2019. Please see the new wording in policy D1.
Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/067	Design	D1 Design Standards			D1.1			The policy currently does not include a reference to Inclusive Design or Inclusive Design Standards. It is considered that it should reference why inclusive design and accessibility are core parts of 'good design'.	This policy approach has now changed to include additional references to inclusive design and relevant standards. Please see the new wording in policies D1 and D2.
Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/068	Design	D1 Design Standards					D1.1	It should reference resources to aid its implementation in D1.1 e.g. <ul style="list-style-type: none"> •Design Council (2011) The principles of inclusive design – they include youhttps://www.designcouncil.org.uk/fileadmin/uploads/dc/Documents/the-principles-of-inclusive-design.pdf •LLDC (2019) Inclusive Design Standards https://www.queenelizabetholympicpark.co.uk/-/media/inclusive-design-standards-low-res-final.ashx (the bibliography sets down the key legislation, regulations and best practice as of 2019). 	This policy approach has now changed due to the need to include additional reference to inclusive and active design standards, making use of nationally available best practice guidance. Please see the new wording in policies D1 Design Standards and D2 public Realm Net Gain.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	The Local Plan addresses this topic through promotion of art in appropriate public realm locations, and protection of heritage assets. However, it cannot deliver the change you have requested, as street naming is not a planning consideration. Please refer to the London Borough of Newham Street Name and Numbering Policy Guidelines – Updated September 2021, which includes consideration of the use of names of local people that have cultural significance. The Street Naming and Numbering team can be reached through email at snn@newham.gov.uk						D1 Design Standards	Design	Reg18-Am-001/063	Manor Park and Little Ilford Assembly	Reg18-Am-001

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted	<p>Thank you for allowing us to comment on the above planning proposal. We currently work in the Metropolitan Police Service Unit of Designing Out Crime Officers (DOCOs). Our unit administers the MOPAC 'Secured by Design' (SBD) scheme. Our Team currently work in the North East Division, of which Newham is one of the 9 Boroughs that we cover. It is a Metropolitan Police Service (MPS) priority to protect vulnerable people. With an anticipated increase of 47,600 new homes and 450,973 square metres of employment by 2028/29 (not including further requirements up to 2038), the security measures within existing and new developments will be paramount for their welfare and continuing good health of all users of these sites.</p> <p>The design and layout of both the physical environment and physical building security is key to creating safe environments and reducing crime and disorder. SBD Accreditation of developments will (and is proven to) reduce crime and fear of it for residents and businesses with up to a 75% decreased chance of being burgled and a 25% reduction in criminal damage. The scheme is also successful in reducing anti-social behaviour through a raft of measures including: robust communal door standards; access control; and</p>					D1 Design Standards	Design	Reg18-E-011/001	Metropolitan Police Service - Designing Out Crime	Reg18-E-011

Comment Response	
Comment	careful design/layout of new homes. The Secured by Design Scheme can deliver safe, sustainable homes and businesses through techniques in crime prevention utilising independently tested products proven to resist forced entry. Projected estimated savings for Police and Council resources by using SBD on new builds is approximately £1 million a year. This figure is cumulative year on year so the more projects which incorporate SBD measures will provide a higher ongoing saving to the Borough.
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
							D1.3			Metropolitan Police Service - Designing Out Crime	Reg18-E-011
	We are supportive of these comments and in particular Policy D1 read alongside the Implementation section requiring SBD accreditation for developments. We would request that this is for all major developments over 10 units of residential and 1000m2 of commercial.							Design	Reg18-E-011/003		
	This wording change has been made. Please see the new wording in policy D1 and its implementation text.										
		D2.1d						Design	Reg18-E-011/005	Metropolitan Police Service - Designing Out Crime	Reg18-E-011
	1) Due consideration and reference should be made to Section 17 of the Crime and Disorder Act 1998 (and other National Policies in Appendix 1) which places a duty on local authorities to do all they can to reasonably prevent crime and disorder in their area. Embedding SBD principles will ensure this obligation is met and the success of the scheme is highlighted later [earlier in comments].										
	Comment noted.										

Reg18-E-011	Metropolitan Police Service - Designing Out Crime	Reg18-E-011/006	Design	D1 Design Standards			D1.3		<p>2) The Localism Act 2011 references the need for Local Planning Authorities to have a Duty-to Cooperate. Newham and Local surrounding Boroughs currently do apply robust SBD Conditions attached to their construction, which in turn provides a better level of security for the residents living there. It is important to continue this requirement and ensure no ambiguity in what this will entail.</p> <p>It should be noted that Waltham Forest's proposed new Local Plan also proposes a specific Policy around Designing Out Crime and the need for suitable SBD certification and other security specialist involvement. It would be advised that Newham also promotes the same consistent duty of care for its residents as neighbouring Boroughs do. This is especially relevant as Newham and Waltham Forest are currently operating as a joint Borough (North East Area) under the MPS Basic Command Units. Waltham Forest Local Plan 2020-2035 Policy 60: Making Safer Places and Designing out Crime</p> <p>To improve community safety and cohesion Waltham Forest will work with partners to:</p> <p>A. Minimise opportunities for criminal behaviour by requiring all forms of new development to incorporate 'Designing out Crime' and Secured by Design, and require all major developments to apply for, and seek to achieve, Secured By Design accreditation via the Secured by Design scheme;</p> <p>B. Co-ordinate land uses to minimise the likelihood of an increase in crime and disorder;</p> <p>C. Promote safer streets and public realm</p>	<p>This wording change has not been made. We did not consider this change to be necessary as designing out crime and embedding safety considerations are suitably addressed through policy D1 and a range of other policies across the Plan.</p>
-------------	---	-----------------	--------	---------------------	--	--	------	--	--	--

										<p>improvements throughout the Borough, where necessary in liaison with the Metropolitan Police Designing Out Crime Officers, Counter Terrorism Security Advisors (CTSAs), Traffic Management Unit (TMU) and with the British Transport Police (BTP).</p> <p>We would recommend that Policy D1, Section 3 (page 42) is reworded to: “Safety and security features of buildings should be well integrated into the overall design, and complement and not impede delivery of quality public and communal spaces. Secured by Design standards and accreditation should be achieved through early and ongoing engagement with the Metropolitan Police Designing out Crime Officers (DOCOs), Counter Terrorism Security Advisors (CTSAs), Traffic Management Unit (TMU) and with the British Transport Police (BTP). This would help to align the Policy with Waltham Forest’s New Local Plan, but also ensure that the correct units for security advice are signposted at the earliest opportunity for developers and architects.</p>	
--	--	--	--	--	--	--	--	--	--	---	--

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
							D1.3			Metropolitan Police Service - Designing Out Crime	Reg18-E-011
	Support noted	3) We are supportive of the clear requirement for accreditation via SBD and removal of terms such as “practices and principles of SBD”; which from prior experience can result in ambiguity and alternative interpretation by Developers not aligned with advice from the Designing Out Crime Officers.					D1.5			Metropolitan Police Service - Designing Out Crime	Reg18-E-011
	This wording change has not been made. We did not consider this change to be appropriate as the processes for operating the Newham Design Review Panel are not part of the Local Plan policy, and adequate importance is already given in a number of policies of the Plan to the need to promote safety and security. The Council already advertises the pre-application services of other consultees, such as the MET, the Environment Agency and Historic England, alongside its own pre-application service, on the Council's website.	10) We would also ask that we are involved in the Design Review Panel (Policy D1, Page 42, Point 5) to help educate but also promote safe and secure Design for Newham.					D1 Design Standards	Design	Reg18-E-011/014		

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted	My colleagues and I strive to ensure that new developments across London reach the highest possible security standards, mainly through partnership working with the relevant Planning Departments and requesting conditions to comply with Secured by Design. By including a requirement in your Core Planning Strategy that new schemes comply with Secured by Design after proper consultation with Designing out Crime Officers, we are better placed to deliver secure developments across the London Borough of Newham. SBD also covers Commercial aspects of design including Shops, Schools, Hospitals and Places of Worship. As Newham are proposing to regenerate their main Commercial Sectors, Additions to new or existing Hospitals, introduce new transport hubs and multiple new Public Spaces; this will bring new challenges and pressures to keep up with the increased footfall and potential crime associated with this. It should also be noted that the marginal carbon cost of building a home to Secured By Design standards would be recovered within four years and so supports a Carbon Footprint reduction for the Borough. Thank you again for seeking our opinion in relation to this important document. If you require any clarification of any of the					D1 Design Standards	Design	Reg18-E-011/016	Metropolitan Police Service - Designing Out Crime	Reg18-E-011

Comment Response	
Comment	comments made, please do not hesitate to contact us at the above address.
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
	This wording change has been made. Please see the new wording in policy D1, including the implementation section.	D1.1 [Appendix D] Policy D1 Design standards Implementation D1.1 Page 42 Proposed Suggested Amendments: <u>Where excavation takes place</u> , plant (excluding solar panels) should be located below ground. Where <u>no excavation has taken place</u> , this is not feasible , it plant should be satisfactorily integrated into the form and design of the roof, <u>or sensitively located at ground level</u> . Reason / Comment Below ground would not be possible if there is no excavation. Plant can be located at ground level if sensitively located.					D1 Design Standards	Design	Reg18-E-073/021	Notting Hill Genesis	Reg18-E-073
	Comment noted. The London Plan, which is also part of the Newham Development Plan, addresses this topic through policy D12. Further, the safety credentials of material, including insulation and cladding, are governed by separate legislation, under Building Regulations, which have been amended in light of lessons learned following the Grenfell disaster.	Fire risk Secondly, can you have external insulation that isn't a fire risk? Some of my home is solid wall, so can't have cavity wall insulation, and I think that tower blocks can't usually have cavity wall insulation. But wasn't it external wall insulation that caused the terrible Grenfell fire? Or at least, let it spread with such catastrophic results?					D1 Design Standards	Design	Reg18-E-027/016	Resident	Reg18-E-027

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-030	Resident	Reg18-E-030/001	Design	D1 Design Standards					Extensions	<p>I would like to add in that I believe Newham council planning department should give clear guidance on double storey rear extensions and relax the planning restrictions for this development.</p> <p>We should be able to build a full 3 meters double storey extensions to the rear of the property.</p> <p>This will help create much needed space and improve housing size and quality in Newham.</p>	<p>This wording change has not been made. We did not consider this change to be necessary as the policy criteria set within policies D1 and D7 are considered effective at addressing the design quality for a range of small scale developments, including extensions, while having due regards to each site's unique context and potential impacts. Each case is considered on its merits, and independent of existing similar builds in the vicinity.</p>
Reg18-E-082	Resident	Reg18-E-082/028	Design	D1 Design Standards					D1.5	<p>5. Design</p> <ul style="list-style-type: none"> • Page.42. (Policy D1: Design standards). The local community should be involved in influencing design at the earliest stages. It is therefore critical that developers engage the community at the scoping stage and re-engage at various stages such as design workshops. Inputs from community engagement should be considered and rationale given as why these recommendations were or were not incorporated into finalised design (inputted into the Design and Access Statement documentation) presented during the planning application stage including to Committee, 	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as the draft Local Plan policy D1 and BFN2 support quality and early engagement of communities by building on existing best practice. The Council welcomes feedback from residents, and there are a number of ways to comment on planning applications or to provide broader comments. However, the policy has changed to include additional implementation detail about the importance of early engagement in the design brief evolution of the scheme with a multitude of local communities in order to ensure the selected design option for the development is inclusive.</p>

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		Obligations					D1 Design Standards	Design	Reg18-E-082/029	Resident	Reg18-E-082
	A change to this policy approach has not been made. We did not consider this change to be necessary as the Plan already makes suitable provisions for post-occupancy surveys and for long term management of developments, including their public realm. Building Regulations and Planning Enforcement teams work together to assess the quality of buildings and take enforcement action where necessary and expedient to do so.	<ul style="list-style-type: none"> Page.43. Post construction inspections should ensure quality of design is robust at 12 and 24 months along with post-occupancy satisfaction surveys which should be secured and funded by developers via legal agreement. The development across Newham in recent years have demonstrated delivery of poor-quality schemes (where materials are already falling off such as facade, paving becoming uneven and a trip hazard due to poor ground preparation and faulty installation of sustainable urban drainage systems. Such outcomes are a direct result of a lack of strict quality enforcement processes including lack of effective monitoring. 									
	A change to this policy approach has not been made. We did not consider this change to be appropriate as the draft Local Plan policy D1 and BFN2 support quality and early engagement of communities by building on existing best practice. The Council welcomes feedback from residents, and there are a number of ways to comment on planning applications or to provide broader comments. However, the policy has changed to include additional implementation detail about the importance of early engagement in the design brief evolution of the scheme with a multitude of local communities in order to ensure the selected design option for the development is inclusive.	D1.5					D1 Design Standards	Design	Reg18-E-082/030	Resident	Reg18-E-082
		<ul style="list-style-type: none"> Page.43. It is important that there are high levels of ‘end-to-end’ engagement from developer teams and planners at Newham, from pre-application discussions and negotiations, through to the discharge of conditions and post occupancy, including liaison with design officers as well as having publicly available online record of monitoring inspections. There should be an opportunity for local residents to monitor and feedback to the Council. It is recommended that officers review guidance from the RTPi (Royal Town Planning Institute) on Planning and Design (2019) 									

Comment Response	
Comment	https://www.rtpi.org.uk/media/1990/planninganddesignquality2019.pdf
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
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as the space standards required by the draft Local Plan (H11.2. a) correspond with the minimum internal standards set out in the London Plan. While not directly comparable, the London Plan space standards are generally higher in terms of overall floorspace provision than the 1961 Parker Morris standards.</p> <p>Increased internal space standards for new homes can have a viability impact on new developments coming forward. We consider our new housing design policy (H11) and the 2021 London Plan strike the right balance between securing a spacious, high quality home while ensuring the viability of schemes isn't unduly impacted.</p> <p>Further, principals of good placemaking that were part of the Parker Morris Report, such as: access to suitable playspace, the needed to employ suitable qualified professionals (architects, landscape architects etc.), use of quality materials that can be easily maintained, the need for maintenance of buildings and public realm, are all imbedded in the principles of this policy as well as the wider Local Plan policies, and based on up-to-date best practice guidance.</p>						D1 Design Standards	Design	Reg18-E-104/018	Resident	Reg18-E-104

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This wording change has not been made. We did not consider this change to be necessary as the policy criteria set within policies D1 and D7 are considered effective at addressing the design quality for a range of small scale developments, including extensions, while having due regards to each site's unique context and potential impacts. Each case is considered on its merits, and independent of existing similar builds in the vicinity. Please note a range of flexibilities are also provided to homeowners wishing to expand under permitted development rights rules, for which the legislation does not require application of policy.						D1 Design Standards	Design	Reg18-T-002/014	Resident	Reg18-T-002
	This wording change has not been made. We did not consider this change to be necessary as the policy criteria set within policies D1 and D7 are considered effective at addressing the design quality for a range of small scale developments, including extensions, while having due regards to each site's unique context and potential impacts. Each case is considered on its merits, and independent of existing similar builds in the vicinity. Please note a range of flexibilities are also provided to homeowners wishing to expand under permitted development rights rules, for which the legislation does not require application of policy.						D1 Design Standards	Design	Reg18-T-002/026	Resident	Reg18-T-002

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This wording change has not been made. We did not consider this change to be necessary as the policy criteria set within policies D1 and D7 are considered effective at addressing the design quality for a range of small scale developments, including extensions, while having due regards to each site's unique context and potential impacts. Each case is considered on its merits, and independent of existing similar builds in the vicinity. Please note a range of flexibilities are also provided to homeowners wishing to expand under permitted development rights rules, for which the legislation does not require application of policy.						D1 Design Standards	Design	Reg18-T-002/037	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 supports retrofit and refurbishment of existing properties through. As and when these come forward for planning permission, the policies of the plan will be used to secure high quality development. However, many maintenance interventions and retrofit solutions do not require planning permission; nor is it possible to impose design standards retrospectively on existing buildings or recently approved developments being delivered.						D1 Design Standards	Design	Reg18-T-002/038	Resident	Reg18-T-002

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 necessary as the policy criteria set within policies D1 and D7 are considered effective at addressing the design quality for a range of small scale developments, including extensions, while having due regards to each site's unique context and potential impacts. Each case is considered on its merits, and independent of existing similar builds in the vicinity. Please note a range of flexibilities are also provided to homeowners wishing to expand under permitted development rights rules, for which the legislation does not require application of policy. In limited circumstances, it may be possible to use planning enforcement powers to ask landowners to tidy up their land. Please email any concerns about specific properties to Planning.Enforcement@newham.gov.uk						D1 Design Standards	Design	Reg18-T-002/039	Resident	Reg18-T-002
	Comment noted						D1 Design Standards	Design	Reg18-T-043/001	Resident	Reg18-T-043
	Comment noted						D1 Design Standards	Design	Reg18-T-057/008	Resident	Reg18-T-057

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This wording change has not been made. We did not consider this change to be necessary as the principles of good design and integration into neighbourhoods is imbedded in policies D1 and D3. The Characterisation Study has undertaken a more detailed assessment of the built environment of the borough, which recognises both the value of protecting historic street scenes and development patterns, as well as the need to enhance and integrate areas that have a less coherent character. The findings and recommendations of the Characterisation Study have been taken forward in the aforementioned policies.						D1 Design Standards	Design	Reg18-T-072/009	Resident	Reg18-T-072
	This wording change has not been made. We did not consider this change to be necessary as Secure by Design is imbedded in the policy, while appropriate insulation of new and refurbished buildings is supported through the policies in the Climate Emergency chapter.						D1 Design Standards	Design	Reg18-T-074/003	Resident	Reg18-T-074

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. No additions have been made.	[Add to it]					D1 Design Standards	Design	Reg18-T-098/003	Resident	Reg18-T-098
	This wording change has not been made. We did not consider this change to be necessary as the policy already supports public engagement and co-design. However, the policy implementation text has changed in response to further best practice research and the recommendations made by other consultees, to highlight the key role of engagement in creating developments that are more inclusive. Please see the new wording in policy D1 implementation section.	[Change it] More local feedback					D1 Design Standards	Design	Reg18-T-103/007	Resident	Reg18-T-103
	Support noted	[Keep it]					D1 Design Standards	Design	Reg18-T-114/001	Resident	Reg18-T-114

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This wording change has not been made. We did not consider this change to be appropriate as Newham is a densely built borough, with residential and employment uses often existing or delivered side by side. In line with 15-minute neighbourhood aspirations, the principles of good quality design are applicable irrespective of the use, and there is sufficient flexibility built into the policy to allow for site-specific considerations. However, the implementation text has been amended to clarify the expectation that employment development should optimise application of the principles to their site.	b. Draft Policy D1 (Design standards) This draft Policy sets out a range of criteria for “All developments”. As with draft Policy BFN2 above, not all of the listed criteria will be suitable or appropriate for application to large-scale industrial or logistics developments and are most suitable for residential and mixed-use developments. For example, part 1(d) of the draft Policy states that development should be of a human scale, with the relationship between streets and buildings supporting a comfortable pedestrian microclimate. This is not a realistic objective for a major industrial development.		D1.1d			D1 Design Standards	Design	Reg18-E-116/011	SEGRO Plc	Reg18-E-116
	This wording change has not been made. We did not consider this change to be appropriate as Newham is a densely built borough, with residential and employment uses often existing or delivered side by side. In line with 15-minute neighbourhood aspirations, the principles of good quality design are applicable irrespective of the use, and there is sufficient flexibility built into the policy to allow for site-specific considerations. However, the implementation text has been amended to clarify the expectation that employment development should optimise application of the principles to their site.	In terms of part 1(e), there are challenges in integrating “living building” features on industrial buildings which are discussed further below (see section 6a),		D1.1e			D1 Design Standards	Design	Reg18-E-116/012	SEGRO Plc	Reg18-E-116

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This wording change has not been made. We did not consider this change to be appropriate as Newham is a densely built borough, with residential and employment uses often existing or delivered side by side. In line with 15-minute neighbourhood aspirations, the principles of good quality design are applicable irrespective of the use, and there is sufficient flexibility built into the policy to allow for site-specific considerations. However, the implementation text has been amended to clarify the expectation that employment development should optimise application of the principles to their site.						D1 Design Standards	Design	Reg18-E-116/013	SEGRO Plc	Reg18-E-116
	This wording change has not been made. We did not consider this change to be appropriate as Newham is a densely built borough, with residential and employment uses often existing or delivered side by side. In line with 15-minute neighbourhood aspirations, the principles of good quality design are applicable irrespective of the use, and there is sufficient flexibility built into the policy to allow for site-specific considerations. However, the implementation text has been amended to clarify the expectation that employment development should optimise application of the principles to their site.						D1 Design Standards	Design	Reg18-E-116/014	SEGRO Plc	Reg18-E-116

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-116	SEGRO Plc	Reg18-E-116/015	Design	D1 Design Standards					D1.1	If the policy is to apply to all development, SEGRO requests that it is re-framed to be more flexible when applied to industrial/logistics sites reflecting that not all criteria will be appropriate in all cases. At the end of the introductory section to part 1 of the draft Policy the following text could be added: “..... as appropriate to the type of development that is being proposed:”	This wording change has not been made. We did not consider this change to be appropriate as Newham is a densely built borough, with residential and employment uses often existing or delivered side by side. In line with 15-minute neighbourhood aspirations, the principles of good quality design are applicable irrespective of the use, and there is sufficient flexibility built into the policy to allow for site-specific considerations. However, the implementation text has been amended to clarify the expectation that employment development should optimise application of the principles to their site.
Reg18-E-116	SEGRO Plc	Reg18-E-116/016	Design	D1 Design Standards					All implementation	The supporting text could then acknowledge that the policy requirements may, in some instances (for example for some industrial uses), not be appropriate. It should be acknowledged that industrial typologies have special operational requirements and therefore, some aspects of the policy must be applied flexibly.	This wording change has not been made. We did not consider this change to be appropriate as Newham is a densely built borough, with residential and employment uses often existing or delivered side by side. In line with 15-minute neighbourhood aspirations, the principles of good quality design are applicable irrespective of the use, and there is sufficient flexibility built into the policy to allow for site-specific considerations. However, the implementation text has been amended to clarify the expectation that employment development should optimise application of the principles to their site.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed to more clearly support active design and refer to the Sports England guidance as a suitable additional guide to support applicants in applying the principles. Please see the new wording in policy D2.	Active Design. Sport England considers that the design of where communities live and work is key to keeping people active and placemaking should create environments that make the active choice the easy choice. Sport England and Public Health England launched guidance called Active Design which intends to inform the urban design of places, neighbourhoods, buildings, streets and active open spaces to promote sport and active lifestyles which would assist in achieving the Council's physical health and wellbeing aspirations detailed in the Draft Local Plan. The guide sets out ten principles to consider when designing places that would contribute to creating well designed healthy communities which has synergy with many elements of the Draft Local Plan, particularly in relation to reducing inactivity in an area, developing 15-minute neighbourhoods, ensuring appropriate infrastructure is installed to facilitate active travel modes and improving public realm and green infrastructure. Sport England support the inclusion of these elements in the Local Plan and recommend that the links between the document and Active Design are developed further and are really drawn out by having clear references to Active Design, its principles and the Active Design Checklist. Active		D1.1			D1 Design Standards	Design	Reg18-E-118/008	Sport England	Reg18-E-118

Comment Response	
Comment	Design principles and the checklist, for example, could be added to design requirements to meet BFN2: Co-Designing and Masterplanning and/or Policy D1: Design Standards. More information on Active Design, including the guidance, can be found at https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-costguidance/active-design
Implementation	
Justification	
Clause	
Introduction	
Site allocation	
Policy	
Chapter	
Comment Reference	
Representor	
Representation Reference	

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/052	Design	D1 Design Standards						The Berkeley Group places great emphasis on high quality design; we create bespoke masterplans which are designed in collaboration with local stakeholders and ensure each site is delivered with a design led approach responding to the individual opportunities and constraints that exist on each site. On this basis, the Berkeley Group agree that the design process is a key aspect of delivering successful places and that this should be considered from the start of the development process.	Comment noted
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/053	Design	D1 Design Standards						It is noted that the design policies have built on, and should be read alongside, the Newham Characterisation Study (2022) which has identified what makes Newham special and forms part of the evidence base to the Local Plan Refresh and to which the Berkeley Group has engaged with.	Comment noted
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/054	Design	D1 Design Standards						The Berkeley Group generally supports the design principles set out within Policy D1, particularly the emphasis on a contextual design-led approach.	Support noted

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 on the method of retaining architect oversight. Please see the new wording in policy D1 Design Standards.	Point 5 seeks to ensure the quality of design will be secured through conditions, which is supported, however for major developments it is proposed to use planning obligations to require the retention of the original architect to completion. The use of Design Codes particularly for outline planning permissions provide the required mechanism to control any forthcoming design quality as well as standard planning conditions which can secure details of the detailed design. These should be relied upon instead of an obligation to retain the original architect. Whilst the Berkeley Group acknowledge the importance of maintaining design quality throughout the lifetime of the development, a requirement to retain the original architect through to completion is onerous and extends beyond the reach of planning. Whilst this approach may be suitable for smaller sites, sites which are longer term and multi phased are unlikely to be able to adhere to this. An applicant should not be restricted to the use of one architect. The Berkeley Group proposed amendments to draft policy wording: 5. The quality of design will be secured through conditions, and for major developments through planning obligations requiring retention of original architect to completion, and through the		D1.5			D1 Design Standards	Design	Reg18-E-136/055	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136

Comment Response	
Comment	<u>use of Design Codes</u> . Major developments fitting the terms of reference of the Newham Design Review Panel should be assessed by the panel and/or Community Panel appointed by the Local Planning Authority.
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
	This policy approach has now changed to provide more flexibility to site-specific constraints. Please see the new wording in policy D1 Design Standards and its implementation guidance.					D1.1i	D1 Design Standards	Design	Reg18-E-136/056	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136
	A change to this policy approach has not been made. We did not consider this change to be necessary as we continue to consider post occupancy surveys to be a useful tool in monitoring how successful the Plan has been at delivering its objectives.						D1 Design Standards	Design	Reg18-E-136/057	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136
	This policy approach has now changed to allow for more flexibility on the method of retaining architect oversight. Please see the new wording in policy D1 Design Standards.	Planning obligations					D1 Design Standards	Design	Reg18-E-136/366	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/367	Design	D1 Design Standards						The Berkeley Group proposed amendments to draft policy wording: <ul style="list-style-type: none"> • Post-occupancy satisfaction surveys will be secured via legal agreement, <u>where applicable on a site by site basis</u>, in line with Policy BFN2. • Commitment to design code, where applicable, will be secured via legal agreement. 	A change to this policy approach has not been made. We did not consider this change to be necessary as we continue to consider post occupancy surveys to be a useful tool in monitoring how successful the Plan has been at delivering its objectives.
Reg18-E-080	Transport Trading Limited Properties Limited	Reg18-E-080/022	Design	D1 Design Standards						TTLP welcome policies which support measures aimed at improving design quality in order to deliver successful places. Whilst many of the measures outlined in draft Policy D1 reflect principles contained within the GLA's Housing Design Guide [...].	Support noted
Reg18-E-080	Transport Trading Limited Properties Limited	Reg18-E-080/023	Design	D1 Design Standards			D1.1i			[Whilst many of the measures outlined in draft Policy D1 reflect principles contained within the GLA's Housing Design Guide], some aspects (e.g. Part 1.i. which requires plant to be located below ground), simply may not be practically feasible in many instances and will impose significant capital costs to most development projects.	This policy approach has now changed to provide more flexibility to site-specific constraints. Please see the new wording in policy D1 Design Standards and its implementation guidance.
Reg18-E-080	Transport Trading Limited Properties Limited	Reg18-E-080/024	Design	D1 Design Standards					D1.5	The concept of introducing a Community Design Review Panel into the Design Review Programme which already operates at Newham is welcomed, and will encourage consultation much earlier in the process. As per existing arrangements, further consideration needs to be given as to how the	Support noted. As and when the Council appoint a Community Design Review Panel, we will make use of best practice advice from other Local Planning Authorities that have employed such methods of engagement to ensure the process is effective.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		confidentiality of Community Design Review Panels can be secured to ensure that emerging proposals are not shared prematurely in the pre-application process.									
	Support noted	Draft Policy D1 sets out the principles of “good design” with which all developments will be expected to meet, including temporary buildings likely to be used for a year or more. This includes the requirements to “create well integrated developments”, “be of an appropriate scale, mass and form for its site”, “integrate natural features”, locate plant below ground or on the roof, and the use of “high quality detailing and materials”. A key feature of draft Policy D1 is that developments should ensure they are integrated with, and thus permeable by, the public. This is evident in Phase 1 of UCL East. UCL is supportive of the aim of draft Policy D1 to achieve good quality design and therefore a high standard of place-making, in a form that is sensitive to the surrounding context. A holistic approach is being taken to the UCL East development, with an initial Outline Consent and RMAs being submitted in respect of each of the plots in Phases 1 and 2. This approach allows for					D1 Design Standards	Design	Reg18-E-054/006	University College London	Reg18-E-054

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		consideration of the impacts of the development at both a wider-site and individual-plot level, ensuring the design process is iterative and flexible in response to the unique needs of the stakeholders and end users of each development.									
	However, in applying design standards to temporary development, UCL feel that there should be a realistic consideration of the proposed length of use to ensure that onerous design requirements do not render the temporary proposals unviable in cost terms.			D1.4			D1 Design Standards	Design	Reg18-E-054/007	University College London	Reg18-E-054
	This policy is not consistent with the policies of the NPPF which relate to this historic environment.						D10 Designated and non-designated heritage assets	Design	Reg18-E-050/025	Anchor	Reg18-E-050
	A change to this policy approach has not been made. We did not consider this to be necessary as Historic England have signalled support for the policy.										
	This policy approach has now changed to provide a more proportionate approach to the design standards and time length of temporary developments. Please see the new wording in Policy D1 Design Standards.										

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted.	j. D10: Designated and Non-designated Heritage Assets, Ancient Monuments and Historic Parks and Gardens - Would you keep, change or add something to this policy? No comment					D10 Designated and non-designated heritage assets	Design	Reg18-E-070/062	Aston Mansfield	Reg18-E-070
	A change to this policy approach has not been made. We did not consider this change to be necessary as the policy is aligned with the NPPF approach, which gives significant weight to any level of harm to designated heritage assets and their setting. The implementation section provides further guidance about the acceptable public benefits that may be balanced against the harm identified.	Ballymore supports the Council's desire to protect designated heritage assets across the Borough, however, we contend that the wording of draft policy D10 should be amended to reflect the NPPF (paragraphs 199-202) in that less than substantial harm to designated heritage assets may be acceptable when appropriately outweighed by the public benefits of a scheme, rather than the current draft wording which seeks to resist any level of harm. The current wording fails to recognise that some harm may be necessary or unavoidable to support the redevelopment of strategic sites and deliver wider public benefits.					D10 Designated and non-designated heritage assets	Design	Reg18-E-077/013	Ballymore Group	Reg18-E-077
	Support noted	[Keep it]					D10 Designated and non-designated heritage assets	Design	Reg18-T-084/013	Business Owner	Reg18-T-084

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Support noted. Please note this policy is now D9.	City of London supports the need to ensure that the value of all designated and non-designated heritage assets within the Borough is conserved and enhanced, in accordance with Draft Policy D10 (Designated and non-designated heritage assets, ancient monuments and historic parks and gardens).					D10 Designated and non-designated heritage assets	Design	Reg18-E-148/017	City of London	Reg18-E-148
	Support noted	In particular, City of London acknowledges the need to ensure that development affecting a Historic Park or their setting, such as West Ham Park should seek to: - protect and enhance key views out from the landscape; and - not detract from its public access, functionality and enjoyment, layout, design or character; and - not prejudice future restoration; and - make a positive contribution to the historic streetscape of the park.		D10.4			D10 Designated and non-designated heritage assets	Design	Reg18-E-148/018	City of London	Reg18-E-148
	Support noted	Moreover, the City of London welcomes the supporting text (D10.2 and D10.3) to Draft Policy D10 which states that where there is a level of harm, public benefits that could justify harm include 'providing public access to previous inaccessible heritage assets' and 'bringing the asset into viable use where all other alternatives to secure the future of the asset have been exhausted'.	D10.2 an D10.3				D10 Designated and non-designated heritage assets	Design	Reg18-E-148/020	City of London	Reg18-E-148

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	The comment you have provided has not resulted in a change as we did not consider this change to be necessary as the contribution of ancillary uses/buildings within the curtilage of a listed asset to its significance is already an established and legal consideration. This implementation text has now changed to provide better clarity on this relationship between ancillary uses/buildings and the listed park's significance. Please see the new wording in Policy D9 (formerly D10) Implementation section.	D10.4 It is noted that supporting text D10.4 to Draft Policy D10 states that 'ancillary uses such as caretaker homes and tree nurseries should also be protected where they are considered to be integral to the historic importance of the park' . The contribution that ancillary uses make to the historic importance of parks is only one of many material considerations that determine whether their protection is warranted. We consider that as worded, the supporting text places unnecessary emphasis on a single factor that would need to be weighed against significant others, such as, the park's need for that use (now and in the future), its long term viability and the impact that retaining such a use, if redundant and / or not viable, would have on the park (as a Designated Heritage Asset). We suggest therefore that the words highlighted above are deleted.					D10 Designated and non-designated heritage assets	Design	Reg18-E-148/022	City of London	Reg18-E-148
	This wording change has been made. Please see the new wording in policy D9 (formerly D10).	An explicit reference to non-designated archaeology should be included here.					D10 Designated and non-designated heritage assets	Design	Reg18-E-147/024	Historic England	Reg18-E-147

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 necessary as the maintenance of built heritage, and enforcement of this, is guided by separate legislation to that for plan-making. If you are concerned about a heritage asset, please contact the planning enforcement team by emailing Planning.Enforcement@newham.gov.uk	Built heritage - poor/neglect - enforcement of buildings.					D10 Designated and non-designated heritage assets	Design	Reg18-D-001/140	Local Plan Drop-In	Reg18-D-001
	This wording change has been made. Please see the new wording in policy D9 (formerly D10).	Policy D10: Heritage Assets/Park and Gardens In general we welcome the content in policy D10 however have some comments: • In point 1, please clarify what is meant by heritage assets 'at Risk' and where this information can be obtained. It is unclear whether this refers to Historic England's Heritage at Risk Register or a separate category employed by the council.			D10.1		D10 Designated and non-designated heritage assets	Design	Reg18-E-084/011	London Historic Parks and Gardens Trust	Reg18-E-084
	This wording change has been made. Please see the new wording in policy D9 (formerly D10).	• Please expand point 4 to include a note that 'developments affecting Newham's Historic Parks or their setting should respond to, protect and enhance their historic significance and heritage value.'			D10.4		D10 Designated and non-designated heritage assets	Design	Reg18-E-084/012	London Historic Parks and Gardens Trust	Reg18-E-084

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-084	London Historic Parks and Gardens Trust	Reg18-E-084/013	Design	D10 Designated and non-designated heritage assets					D10.4	<ul style="list-style-type: none"> It is unclear what is considered to constitute a 'Historic Park' in Newham, beyond the two designated RPGs (West Ham Park and the City of London Cemetery). We would encourage the council to draw up a list and publish this information on the interactive policies map to ensure that non-designated but locally important parks with heritage value are adequately protected by this policy. We refer the council to LPG's Inventory (see appendix) to help achieve this. 	A change to the policies map has not been made. We did not consider this change to be appropriate as the designation of heritage assets, national and local, is undertaken through separate processes to that of plan-making. However, we will explore the possibility of adding a supporting information layer to the Policies Map when it is published that can include this information. There are currently no locally listed parks or gardens in Newham.
Reg18-E-024	Resident	Reg18-E-024/001	Design	D10 Designated and non-designated heritage assets						<p>[Old Manor Park library] I know the inside was converted by Bow artists group, not sure if it is still used by them? Is Newham council responsible for the exterior of the building? It's an historic building and should be maintained.</p>	Comment noted. The Local Plan policy protects against the loss of valuable listed buildings. However, it cannot deliver the change you have requested as the maintenance of built heritage, and enforcement of this, is guided by separate legislation to that for plan-making. The Newham Council is the landowner of the site, and the property is managed by the Council's Commercial Property team who may be able to help. The former library continues to be leased to Bow Arts who operate at the site to provide creative spaces for local artists.
Reg18-T-002	Resident	Reg18-T-002/050	Design	D10 Designated and non-designated heritage assets					Disrepair	<p>[Change it] The Earl of Essex falls into this category and look what has happened to it. Why has this heritage asset been allowed to get into this awful state and be given to a landlord who doesn't have any interest at all in preserving or opening a heritage family pub. People</p>	A change to this policy approach has not been made. We did not consider this change to be necessary as maintenance of built heritage and enforcement of this is guided by separate legislation to plan-making. If you are concerned about a heritage asset, please contact the planning enforcement team by

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	emailing Planning.Enforcement@newham.gov.uk	won't believe your policies if they don't redress past failings									
	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. However, the policy has changed in response to recommendations made by other consultees to provide further clarity to the policy. Please see the new wording in policy D9 (formerly D10).	[Add to it] ?					D10 Designated and non-designated heritage assets	Design	Reg18-T-057/017	Resident	Reg18-T-057
	This wording change has not been made. We did not consider this change to be appropriate there is no evidence to support exclusion of consideration of certain uses in relation to heritage assets. All proposals are assets on their merits in light of their respective impact on heritage assets.	[Add to it] Please ensure heritage sites and buildings are not damaged or re-purposed for inappropriate non-cultural activities like youth centres or skateboarding that destroys the areas.			D10.1		D10 Designated and non-designated heritage assets	Design	Reg18-T-072/001	Resident	Reg18-T-072
	This wording change has not been made. We did not consider this change to be necessary as a level of change is necessary to maintain viable use of heritage assets, which will help preserve them. Any proposed development affecting heritage sites and their setting will be assessed against policies seeking to protect and enhance the significance of the assets.	[Add to it] Please keep heritage and conservation areas in tact					D10 Designated and non-designated heritage assets	Design	Reg18-T-072/008	Resident	Reg18-T-072

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This wording change has not been made. We did not consider this change to be necessary as a level of change is necessary to maintain viable use of heritage assets, which will help preserve them. Any proposed development affecting heritage sites and their setting will be assessed against policies seeking to protect and enhance the significance of the assets.						D10 Designated and non-designated heritage assets	Design	Reg18-T-072/010	Resident	Reg18-T-072
	This wording change has not been made. We did not consider this change to be necessary as the use of the word 'proportionate' in the policy provides the necessary flexibility and allows for the negotiations process to agree best approach in the context of each individual site. However, the policy has changed to clarify that the public realm contributions will be negotiated on the basis of an Active Travel Zone Assessment, aligned with TFL approach. Please see the new wording in policy D2.				D2.3		D2 Public Realm Net Gain	Design	Reg18-E-050/024	Anchor	Reg18-E-050
	Support noted						D2 Public Realm Net Gain	Design	Reg18-E-070/053	Aston Mansfield	Reg18-E-070
	Support noted						D2 Public Realm Net Gain	Design	Reg18-E-148/013	City of London	Reg18-E-148

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		floorspace which reflects and complements the built and natural character and history of the site's immediate context and wider neighbourhood.									
	This wording change has not been made. We did not consider this change to be necessary as the policy already supports greening as a key feature of public realm net gain.]. However, the policy has changed to clarify that green infrastructure is a requirement for developments across the brought, rather than just in areas of deficiency of access. Please see the new wording in Policy D2.	D2.2					D2 Public Realm Net Gain	Design	Reg18-E-145/063	Environment Agency	Reg18-E-145
	This wording change has been made. Please see the new wording in the implementation section of policies D1 and D2.	D2.2					D2 Public Realm Net Gain	Design	Reg18-E-145/076	Environment Agency	Reg18-E-145
	This wording change has not been made. We did not consider this change to be necessary as the policy is proportionate in its support for green infrastructure and is complementary to policies in the Green and Water Space chapter.	D2.2					D2 Public Realm Net Gain	Design	Reg18-E-145/077	Environment Agency	Reg18-E-145

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-145	Environment Agency	Reg18-E-145/078	Design	D2 Public Realm Net Gain					D2..2	There is also an opportunity to promote the borough's expectations around the Urban Greening Factor (UGF), as per draft Local Plan Policy GWS2 and London Plan Policy G5. The London Plan's new guidance on UGF could also be included in the guidance document column (Urban Greening Factor (UGF) guidance London City Hall).	This wording change has not been made. We did not consider this change to be necessary as the policy is proportionate in its support for green infrastructure and is complementary to policies in the Green and Water Space chapter.
Reg18-E-130	Hadley Property Group	Reg18-E-130/073	Design	D2 Public Realm Net Gain			D2.2			Hadley is broadly supportive of the D2.2 requirement for major residential developments to make positive qualitative contributions to the public realm, such as creating well-considered routes through the site, maximising natural features and providing public art installations in areas of high footfall.	Support noted
Reg18-E-130	Hadley Property Group	Reg18-E-130/074	Design	D2 Public Realm Net Gain						Hadley's plans for IQLN incorporate public realm improvements that will maximise use of the site and help to deliver its sustainable development goals.	Comment noted

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-130	Hadley Property Group	Reg18-E-130/075	Design	D2 Public Realm Net Gain			D2.2.c			Hadley notes the D2.2(c) requirement for “major developments in areas of deficiency of access to children’s play space” being required to “incorporate a bigger element of child play space” if the over-5s child yield is over ten and to “allow public access to at least one play space for over 5s.” It is not always possible for play space to be publicly accessible as it is often located at podium or terrace level. Hadley requests that flexibility is added to the policy to state that this should not be required where it can be demonstrated it would not be feasible or would be at the detriment of other provisions.	This policy approach has now changed due to additional evidence being available from the Green Space Infrastructure Study (2023). This has led to specific playspace requirements being imbedded in site allocations, and thereafter this policy is complementary, encouraging additional provision of playspace to be located in the public realm of the scheme. Please see the new wording in policy D2 and its implementation texts.
Reg18-E-130	Hadley Property Group	Reg18-E-130/078	Design	D2 Public Realm Net Gain			D2.2.c			The provision of play space across the borough to cater for deficiency that has accumulated over the years should not unduly be borne by future applicants. The same applies to the overprovision of public realm and open space which is not supported by any methodology or mechanism to put proportionate onus onto future redevelopments	This policy approach has now changed due to additional evidence being available from the Green Space Infrastructure Study (2023). This has led to specific playspace requirements being imbedded in site allocations, and thereafter this policy is complementary, encouraging additional provision of playspace to be located in the public realm of the scheme. Please see the new wording in policy D2 and its implementation texts.
Reg18-E-130	Hadley Property Group	Reg18-E-130/079	Design	D2 Public Realm Net Gain			D2.5			Hadley supports the principle of development on allocated sites to provide new areas of public realm.	Support noted

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
							D2 Public Realm Net Gain	Design	Reg18-E-130/080	Hadley Property Group	Reg18-E-130
	However, it objects to the suggestion in Part D2.5(a) that allocated sites should provide additional public realm “beyond the requirements set out in the allocation”. The provision of new public realm will depend on the circumstances of each site and the policy should not include a vague requirement for more space.						D2.5.a				
	This policy approach has now changed to recognise that requirements for new public realm floorspace are already embedded in site allocations which would result in quantitative net gains meeting the requirements of this policy. Given the range of requirements set by other parts of policy D2 which already promote optimisation of public realm on sites for major development, this part has been removed.										
	Add to para 1a ‘... reflect and complement the built, archaeological and natural character ...’						D2.1a	Design	Reg18-E-147/019	Historic England	Reg18-E-147
	This wording change has been made. Please see the new wording in Policy D2.										
	Historic England’s advice note Streets for All could be included in list of guidance	D2.2 table					D2 Public Realm Net Gain	Design	Reg18-E-147/020	Historic England	Reg18-E-147
	This wording change has been made. Please see the new wording in Implementation section of Policy D2.										
	There needs to be further clarity on what basis the contributions towards public realm enhancement set out in Part 3 of the policy. For example, is this where the Transport Assessment identifies required mitigation or based on increased movements from the proposed development?	D2.3					D2 Public Realm Net Gain	Design	Reg18-E-105/013	IQL South	Reg18-E-105
	This wording change has been made. Please see the new wording in policy D2 clarifying that the process is based on the Active Travel Zone assessment as set out by TfL guidance.										

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This planning obligations approach has now changed to provide the methodology for calculating maintenance costs, in line with the Highways department's practice. Please see the new wording in the planning obligations section of policy D2. We did not consider further change to be necessary as the use of the word 'proportionate' in the policy provides the necessary flexibility and allows for the negotiations process to agree best approach in the context of each individual site. However, the policy has changed to clarify that the public realm contributions will be negotiated on the basis of an Active Travel Zone Assessment, aligned with TFL approach. Please see the new wording in policy D2.	Expectations for financial or physical contributions will need to be clear up front to be able to confirm if a S106 requirements are expected to be met and if a viability assessment is required as part of the approach set out in Policy BNF4.					D2 Public Realm Net Gain	Design	Reg18-E-105/015	IQL South	Reg18-E-105
	Comment noted.	The proposal to secure an increase in the quantity of public realm on site allocations through the delivery of new open space is particularly relevant to the Regional Park as a number of site allocations sit adjacent to open spaces within and managed by the Park Authority. Whilst the Regional Park has a role to play in responding to the open space needs of local communities it is important that the design of high density development adjacent to the Park and provision of associated public realm and open space caters for the needs of new residents rather than placing additional pressure on the Park's open spaces such		D2.5			D2 Public Realm Net Gain	Design	Reg18-E-097/011	Lee Valley Regional Park Authority	Reg18-E-097

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		that their quality and value is undermined.									
	Support noted	D2.1 The Authority welcomes the focus within the policy implementation section placed on facilitating the movement of people – pedestrians and cyclists. This will be helpful in terms of enhancing the connections between new development and the Regional Park.					D2 Public Realm Net Gain	Design	Reg18-E-097/012	Lee Valley Regional Park Authority	Reg18-E-097
	Support noted.	The requirement under Policy D2 for a Public Realm Management Plan to be submitted alongside applications is endorsed. It is noted this also encourages smaller residential development proposals to include contributions to the improvement of the wider public realm network. It is important to ensure maintenance of the public realm is secured through development and that as previously stated it preserves the quality of public realm, open space and habitats created as part of BNG.		D2.6			D2 Public Realm Net Gain	Design	Reg18-E-097/014	Lee Valley Regional Park Authority	Reg18-E-097

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		D2.3		D2.3			D2 Public Realm Net Gain	Design	Reg18-E-012/002	Lidl	Reg18-E-012
	This planning obligations approach has now changed to provide the methodology for calculating maintenance costs, in line with the Highways department's practice. Please see the new wording in the planning obligations section of policy D2. We did not consider further change to be necessary as the use of the word 'proportionate' in the policy provides the necessary flexibility and allows for the negotiations process to agree best approach in the context of each individual site. However, the policy has changed to clarify that the public realm contributions will be negotiated on the basis of an Active Travel Zone Assessment, aligned with TFL approach. Please see the new wording in policy D2.	D2 – Public realm net gain Part 3 of this policy states, “All major developments are required to make a proportionate contribution towards public realm enhancement and maintenance beyond the site, as informed by the Transport Assessment.” However, the policy does not state a formula to calculate what a proportionate contribution relates to – nor does it offer differences between residential, commercial and mixed-use development. Further information is required to understand the requirements of this policy and impacts on retail led development to understand the financial requirements the Council seek as a result of development within the Borough.									
	This wording change has been made. Please see the new wording in Implementation section of Policy D2.	Design The criteria for Policy D2 part 2) cover all new build developments or changes of use on sites with a frontage of at least 25 metres. Whilst the objectives of this part of the policy are welcomed, we recommend it be applied proportionately on small corner sites.			D2.2		D2 Public Realm Net Gain	Design	Reg18-E-135/002	London Borough of Redbridge	Reg18-E-135

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
							D2 Public Realm Net Gain	Design	Reg18-E-135/005	London Borough of Redbridge	Reg18-E-135
							D2 Public Realm Net Gain	Design	Reg18-E-084/006	London Historic Parks and Gardens Trust	Reg18-E-084
	Support noted	We support the aspiration of tackling inequality and disproportionality by embedding public realm net gain and inclusive design criteria. We would welcome some discussions to better understand how this could be delivered.									
	Support noted	Policy D2: Public Realm Net Gain We welcome the following commitments in point 2: 'c. major developments in areas of deficiency of access to children's play space, that generate an over-5s child yield at or above ten should incorporate a bigger element of child play space than required by their development's child yield and allow public access to at least one play space for the over 5s age groups.			D2.2c						

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This wording change has been made. Please see the new wording in policy D2.	[Policy D2: Public Realm Net Gain We welcome the following commitments in point 2:] d. in areas of deficiency of access to green space and/or nature, developments should be designed to maximise natural features within or interfacing the public realm, including street trees.’ Given that paragraph 3.169 under policy GSW1: Green Spaces (see more below) notes that there is a lack of green space across the borough we would urge a strengthening of this policy to omit the first part of the sentence – note the strikethrough.				D2.2d	D2 Public Realm Net Gain	Design	Reg18-E-084/007	London Historic Parks and Gardens Trust	Reg18-E-084
	This policy approach has now changed to provide additional sources of guidance for best practice in designing for inclusivity. Please see the new wording in the Implementation section of policy D2.	D2.1 Good practice on Accessibility and inclusivity in the public realm should not be limited to Healthy streets.					D2 Public Realm Net Gain	Design	Reg18-E-052/069	London Legacy Development Corporation	Reg18-E-052
	A change to this policy approach has not been made. We did not consider this change to be necessary as the reasons why inclusive design of the public realm is sufficiently well addressed in the justification text of the policy.	D2.1 The policy should also reference why inclusive design and accessibility are core parts of ‘good design’.					D2 Public Realm Net Gain	Design	Reg18-E-052/070	London Legacy Development Corporation	Reg18-E-052

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		D1.1					D2 Public Realm Net Gain	Design	Reg18-E-052/071	London Legacy Development Corporation	Reg18-E-052
	This policy approach has now changed to provide additional sources of guidance for best practice in designing for inclusivity. Please see the new wording in the Implementation section of policy D1.	should reference resources to aid its implementation in D1.1 e.g. •Design Council (2011) The principles of inclusive design – they include you https://www.designcouncil.org.uk/fileadmin/uploads/dc/Documents/the-principles-of-inclusive-design.pdf •LLDC (2019) Inclusive Design Standards https://www.queenelizabetholympicpark.co.uk/-/media/inclusive-design-standards-low-res-final.ashx (the bibliography sets down the key legislation, regulations and best practice as of 2019).									
	This wording change has not been made. We did not consider this change to be necessary as the general design principles are already imbedded in policies D2 and HS5. Further, the LLDC Evening and Nigh time Economy SPD supports a spatial strategy that is not in conformity with the spatial strategy for visitor evening and night time economy set by this Local Plan.	D2.2					D2 Public Realm Net Gain	Design	Reg18-E-052/072	London Legacy Development Corporation	Reg18-E-052
		The LLDC Evening and Nigh time Economy SPD also provides detailed good practice guidance relevant to the approach in this policy and other parts of the draft Plan and would be worth referencing as supplementary guidance that will remain extant until specifically withdrawn after the transfer of planning powers from LLDC.									

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed to provide the additional sources of guidance for best practice in designing for inclusivity. Please see the new wording in the Implementation section of Policy D2.	D2.2					D2 Public Realm Net Gain	Design	Reg18-E-052/073	London Legacy Development Corporation	Reg18-E-052
	Support noted	D2.1					D2 Public Realm Net Gain	Design	Reg18-E-052/074	London Legacy Development Corporation	Reg18-E-052

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/075	Design	D2 Public Realm Net Gain					D2.1	It is considered that it would be positive to strengthen the wording by drawing attention to the need to better understand the problem and not to see urban design as gender-neutral, assuming everyone is affected equally. This could be achieved by drawing attention to the importance of using public consultation to gather gender-disaggregated data to inform project design; to avoid a tendency to assume what women, girls, and gender-diverse people want and feel in relation to public spaces; perhaps adding: ... <u>alongside auditing of the public realm to gather gender-disaggregated data to inform project design</u> ".	This wording change has been made. Please see the new wording in Implementation section of Policy D2.
Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/076	Design	D2 Public Realm Net Gain					D2.1	It would be positive to add reference in the supporting text to the Gender Inclusive Urban Design Guide that LLDC has recently commissioned as a positive tool for applicants and development managers.	This wording change has been made. Please see the new wording in Implementation section of Policy D2.
Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/077	Design	D2 Public Realm Net Gain					D2.1	It would be also good to recognise that the diversity of offers/multi-functional public realm can also help to achieve the space to feel safe (i.e places occupied by a wide range of different people). For instance, there is a study that shows that the presence of older people increases our sense of safety, while the presence of men decreases it. Places should avoid being designed to be dominated by only one group of people.	This wording change has been made. Please see the new wording in Policy D2.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		D2.1					D2 Public Realm Net Gain	Design	Reg18-E-052/078	London Legacy Development Corporation	Reg18-E-052
	This wording change has been made. Please see the new wording in Implementation section of Policy D2.	A reinforcement here of the importance of engaging the local community and the need to collect gender-disaggregated data when running public consultations to understand the needs of women and girls would be helpful.									
							D2 Public Realm Net Gain	Design	Reg18-E-014/003	Metropolitan Police Service	Reg18-E-014
	This wording change has not been made. We did not consider this change to be necessary as the wording of the planning obligation is sufficiently flexible to address a range of local security and policing interventions that may be required to mitigate the impacts of development. The Local Plan seeks to achieve a range of objectives that will be secured through planning obligations, and the balance of these will be considered on a site by site basis.	Policy D2 (public realm net gain) states the following: “Security and safety contributions identified as a requirement via consultation with the Newham Community Safety Team and the Metropolitan Police Service will be secured through a legal agreement.” The Infrastructure Delivery Plan (July 2022) makes reference to police facilities within the borough, but does not refer to any policing infrastructure requirements. The current draft Local Plan therefore contains a helpful policy regarding public realm related s106, but does acknowledge the wider requirement for section 106 contributions to mitigate the impact of crime. This request is in line with charges already made elsewhere in the country and approved through appeal and court decisions.									

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed due to additional evidence being available from the Green Space Infrastructure Study (2023). This has led to specific playspace requirements being imbedded in site allocations, and thereafter this policy is complementary, encouraging additional provision of playspace to be located in the public realm of the scheme. Please see the new wording in policy D2 and its implementation texts.	<p>We also acknowledge that draft Local Plan Policy D2 (Public Realm Net Gain) (2c) requires the following:</p> <p>“Major developments in areas of deficiency of access to children’s play space, that generate an over-5s child yield at or above ten should incorporate a bigger element of child play space than required by their development’s child yield and allow public access to at least one play space for the over 5s age groups.”</p> <p>The provision of child play space at ground floor level is not always possible or appropriate. Indeed, it is common practice across London to locate such amenity spaces at podium and roof level in high density urban locations, in accordance with the Greater London Authorities (GLA) Shaping Neighbourhoods Play and Informal Recreation SPG. In such circumstances, we consider this draft policy would conflict with Secure by Design. It would be unreasonable and unsafe to allow access to members of the public as this could not be managed.</p> <p>Sufficient flexibility should therefore be provided to ensure that developments can proceed to come forward where this is not possible.</p>		D2.2c			D2 Public Realm Net Gain	Design	Reg18-E-073/015	Notting Hill Genesis	Reg18-E-073

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed due to additional evidence being available from the Green Space Infrastructure Study (2023). This has led to specific playspace requirements being imbedded in site allocations, and thereafter this policy is complementary, encouraging additional provision of playspace to be located in the public realm of the scheme. Please see the new wording in policy D2 and its implementation texts.	<p>[Appendix D] Policy D2 Public Realm Net Gain Page 48 Proposed Suggested Amendments:</p> <p>2(c) – major developments in areas of deficiency of access to children’s play space, that generate an over 5s child yield at or above ten should incorporate a bigger element of child play space than required by their development’s child yield and allow public access to at least one play space for the over 5s age groups</p> <p>Reason / Comment</p> <p>The provision of child play space at ground floor level is not always possible or appropriate.</p> <p>It is common practice across London to locate such amenity spaces at podium and roof level in high density urban locations, in accordance with the Greater London Authorities (GLA) Shaping Neighbourhoods</p> <p>Play and Informal Recreation SPG. In such circumstances, we consider this draft policy would conflict with Secure by Design. It would be unreasonable and unsafe to allow access to members of the public as this could not be managed. Sufficient flexibility should therefore be provided to ensure that developments can proceed to come forward where this is not possible.</p>			D2.2c		D2 Public Realm Net Gain	Design	Reg18-E-073/022	Notting Hill Genesis	Reg18-E-073

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-087	Resident	Reg18-E-087/023	Design	D2 Public Realm Net Gain					D2.1 and D2.2	The Public Realm There is much in the document about improvement to the public realm but unless it is in the hands of decent designers who know how to engage and work with the community we will see more of the same. Every new aspect of town scaping in recent years has increased the visual jumble of signage and traffic lights, outmoded approaches to hard surfaces, lost opportunities for increased street planting and meeting the challenges of disabled people in the Built Environment.	Comment noted. This part of the Plan has now added inclusive design criteria for consideration and provided relevant best practice guidance to support implementation. Please see the new wording in policy D2 Public Realm Net Gain and Policy D5 (formerly D6) Shopfronts and Advertising.
Reg18-T-002	Resident	Reg18-T-002/040	Design	D2 Public Realm Net Gain						[Change it] See previous answers [comments in relation to D1]	Comment noted
Reg18-T-057	Resident	Reg18-T-057/009	Design	D2 Public Realm Net Gain						[Add to it] ?	Comment noted
Reg18-T-098	Resident	Reg18-T-098/004	Design	D2 Public Realm Net Gain						[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.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Unfortunately, it was not clear what changes you wanted to make to this part of the Plan. No changes have been made as a result of your comment, as the policy provides principles of good design to secure the quality and accessibility of public realm interventions. However, the policy and its implementation text has changed in response to further best practice research and recommendations made by other consultees, to include additional guidance on creating inclusive public realm environments that respond to the needs of different groups, including women and girls, disabled people, older people. Please see the new wording in policy D2 and its implementation section.						D2 Public Realm Net Gain	Design	Reg18-T-103/008	Resident	Reg18-T-103
	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						D2 Public Realm Net Gain	Design	Reg18-T-118/005	Resident	Reg18-T-118
	[Please share any feedback you have with us.] I live in Durham road, E16 and littering is becoming a major and unsightly problem. I ask that Newhaven Council tackle this issue please as it is significant for some residents and council tax payers.										

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	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.										
	This wording change has not been made. We did not consider this change to be necessary as the policy criteria applies proportionately to the scale and type of development proposed, and do not impede employment use from being delivered. With employment and residential uses coming closer together as the borough intensifies, it is reasonable to ensure that the public realm in industrial locations is also optimised (including safety considerations), thereby also improving their accessibility to a local labour force.	c. Draft Policy D2 (Public realm net gain) SEGRO notes the ambition to achieve a public realm net gain and recognises the benefits of this. However, it is not always appropriate to provide public realm on smaller schemes, in particular those of an industrial nature where there are safety and security considerations, where footfall is low and where the need to make most effective and productive use of limited industrial land is high. Therefore, SEGRO requests that this policy should only apply to major developments and should exclude industrial/logistics uses.					D2 Public Realm Net Gain	Design	Reg18-E-116/017	SEGRO Plc	Reg18-E-116

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This wording change has not been made. We did not consider this change to be necessary as the use of the word 'proportionate' in the policy provides the necessary flexibility and allows for the negotiations process to agree best approach in the context of each individual site. However, the policy has changed to clarify that the public realm contributions will be negotiated on the basis of an Active Travel Zone Assessment, aligned with TFL approach. Please see the new wording in policy D2.	Part (3) of the draft Policy requires all major developments to make a proportionate contribution towards public realm enhancement and maintenance beyond the site. The Community Infrastructure Levy Regulations (2010) (as amended) are clear at s122 that planning obligations may only be used where the obligation is necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development. Contributions which go beyond these tests to fund wider development and infrastructure across the local authority, should be collected via the CIL regime. There may well be instances where a public realm enhancement/maintenance contribution does not meet the s122 tests and therefore <u>SEGRO requests that the wording in part (3) of draft Policy D2 be amended only to require contributions “where justified”.</u>		D2.3			D2 Public Realm Net Gain	Design	Reg18-E-116/018	SEGRO Plc	Reg18-E-116
	Support noted	The Berkeley Group supports the principle objective of Policy D2 which is to ensure the delivery of high quality public realm and/or secure a public realm net gain.					D2 Public Realm Net Gain	Design	Reg18-E-136/058	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
	This wording change has not been made. We did not consider this change to be necessary as the planning obligations section and implementation section clarify that the intention is for developers to contribute, proportionately and in line with standard TfL and LBN Highways practices, to the delivery of enhanced public realm and the maintenance thereof. However, the policy text has changed to clarify that the assessment approach is that of TfL's Active Travel Zone Assessment. Please see revised wording in policy D2.					D2.2b	D2 Public Realm Net Gain	Design	Reg18-E-136/059	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136
	This policy approach has now changed due to additional evidence being available from the Green Space Infrastructure Study (2023). This has led to specific playspace requirements being imbedded in site allocations, and thereafter this policy is complementary, encouraging additional provision of playspace to be located in the public realm of the scheme. Please see the new wording in policy D2 and its implementation texts.					D2.2c	D2 Public Realm Net Gain	Design	Reg18-E-136/060	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
	This policy approach has now changed due to additional evidence being available from the Green Space Infrastructure Study (2023). This has led to specific playspace requirements being imbedded in site allocations, and thereafter this policy is complementary, encouraging additional provision of playspace to be located in the public realm of the scheme. Please see the new wording in policy D2 and its implementation texts.						D2 Public Realm Net Gain	Design	Reg18-E-136/061	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136
	This policy approach has now changed due to additional evidence being available from the Green Space Infrastructure Study (2023). This has led to specific playspace requirements being imbedded in site allocations, and thereafter this policy is complementary, encouraging additional provision of playspace to be located in the public realm of the scheme. Please see the new wording in policy D2 and its implementation texts.						D2 Public Realm Net Gain	Design	Reg18-E-136/062	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
	This wording change has not been made. We did not consider this change to be necessary as the use of the word 'proportionate' in the policy provides the necessary flexibility and allows for the negotiations process to agree best approach in the context of each individual site. However, the policy has changed to clarify that the public realm contributions will be negotiated on the basis of an Active Travel Zone Assessment, aligned with TFL approach. Please see the new wording in policy D2.			D2.3			D2 Public Realm Net Gain	Design	Reg18-E-136/063	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
	This policy approach has now changed to recognise that requirements for new public realm floorspace are already embedded in site allocations which would result in quantitative net gains meeting the requirements of this policy. Given the range of requirements set by other parts of policy D2 which already promote optimisation of public realm on sites for major development, this part has been removed.	Point 5 (a) of Policy D2 seeks an increase in the quantity of public realm on site allocations, through the delivery of required new open space, and encouraging the creation of additional public realm beyond the requirements set out in the allocation. The principle of maximising the opportunity to deliver new open space and the creation of additional public realm is supported however this is only where feasible to do so and subject to viability and the wording of the policy should acknowledge this. The Berkeley Group proposed amendments to draft policy wording: a. on site allocations, through delivery of required new open space, and encouraging the creation of additional public realm beyond the requirements set out in the allocation, <u>where feasible and subject to viability</u> .		D2.5a			D2 Public Realm Net Gain	Design	Reg18-E-136/064	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
	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.						D2 Public Realm Net Gain	Design	Reg18-T-063/002	Student	Reg18-T-063

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Support noted	[Appendix A] The policy is generally supported and it is noted that the Silvertown hybrid planning application commits to a minimum sitewide open space area (40,124sqm).					D2 Public Realm Net Gain	Design	Reg18-E-111/025	The Silvertown Partnership LLP	Reg18-E-111

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-111/026	Design	D2 Public Realm Net Gain			D2.5			[Appendix A] There is a concern regarding Part 5 which states that “required open space” must be delivered on site allocations. The emerging site allocation for Silvertown Quays, does not set out a quantitative open space requirement but does identify extensive areas of opportunity on the Map. These areas should not be interpreted as a “requirement” per the current wording of Part 5 , and it is therefore suggested that the wording is revised to refer to a need to deliver an increase in the quantity of open space, having regard to the opportunities identified in the site allocation.	This policy approach has now changed to recognise that requirements for new public realm floorspace are already embedded in site allocations which would result in quantitative net gains meeting the requirements of this policy. Given the range of requirements set by other parts of policy D2 which already promote optimisation of public realm on sites for major development, this part has been removed.
Reg18-E-095	Transport for London	Reg18-E-095/013	Design	D2 Public Realm Net Gain			D2.2b			We welcome the requirement in part 2.b. which includes ‘integrating the highways and public rights of way network directly adjacent the site into the site design so it can be considered together, through the application of the Healthy Streets Framework and London Plan (2021) Policy D8, and any relevant local design guidance and code.	Support noted
Reg18-E-095	Transport for London	Reg18-E-095/014	Design	D2 Public Realm Net Gain						However, the London Plan Policy reference should also include Policy T2: Healthy Streets.	This wording change has been made. Please see the new wording in Policy links section of Policy D2
Reg18-E-095	Transport for London	Reg18-E-095/015	Design	D2 Public Realm Net Gain			D2.3			In part 3 we recommend that reference is made to the findings of an Active Travel Zone Assessment which can provide an evidence-based justification for public realm improvements, for which planning obligations should be secured.	This wording change has been made. Please see the new wording in Policy D2.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This wording change has been made. Please see revised wording in Policy T3, which supports reduction of car parking. Policy D2 supporting the provision of enhanced public realm and is clear that any gains in quality or quantity exclude the space intended for car use.	D2.1					D2 Public Realm Net Gain	Design	Reg18-E-095/016	Transport for London	Reg18-E-095
	Support noted	D2.3/4					D2 Public Realm Net Gain	Design	Reg18-E-095/017	Transport for London	Reg18-E-095

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed to recognise that requirements for new public realm floorspace are already embedded in site allocations which would result in quantitative net gains meeting the requirements of this policy. Given the range of requirements set by other parts of policy D2 which already promote optimisation of public realm on sites for major development, this part has been removed.	Policy D2 'Public realm net gain' Part 5 of the policy states: 5. An increase in the quantity of public realm will be delivered: a. on site allocations, through delivery of required new open space, and encouraging the creation of additional public realm beyond the requirements set out in the allocation. b. on unallocated sites larger than 0.25 hectares, through the masterplanning process identifying opportunities to deliver new public realm floorspace. Unite would comment that: <ul style="list-style-type: none"> • Whilst public realm increases is broadly supported, and is often explored by Unite on all their developments there does need to be acknowledgement that not all sites can deliver substantial increases in public realm works, particularly on constrained sites such as those bordered by a railway or highway. This needs to ensure that valuable floorspace is not lost which is a key requirement of ensuring the most efficient use of the land as per regional and national policy. 		D2.5			D2 Public Realm Net Gain	Design	Reg18-E-119/030	Unite Group plc	Reg18-E-119
	Comment noted.	<ul style="list-style-type: none"> • A Public Realm Management Plan can be a useful way to determine what level of public realm can be delivered, however this may be subject to input and involvement from third parties or other land owners and thus more detailed information may only be known at a later 		D2.6			D2 Public Realm Net Gain	Design	Reg18-E-119/031	Unite Group plc	Reg18-E-119

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		stage of the development including delivery matters.									
	The policy planning obligations section has now changed to clarify the formula that will be applied for maintenance costs, which is in line with the methodology that the Highways team currently apply in their negotiations with developers.	<ul style="list-style-type: none"> There should be a clear working formula for any planning obligation to avoid significant costs, particularly if management over a period of 10 years is referenced. 		D2.6			D2 Public Realm Net Gain	Design	Reg18-E-119/032	Unite Group plc	Reg18-E-119
	This approach to this policy implementation has now changed to refer to guidance provided by National Protective Security Authority, including the Public Realm Design Guide for Hostile Vehicle Mitigation (2023). Please see the new wording in Policy D1 Design Standards and D2 Public Realm Net Gain.	<ul style="list-style-type: none"> There are wider highways and safety aspects which effect the type and nature of public realm spaces, particularly where there is high pedestrian footfall or where there are more significant anti-terrorism threats. This will impact quantitative and qualitative increases in public realm as aspects such as planters which may look more attractive may result in other highways issues. 		D2.5			D2 Public Realm Net Gain	Design	Reg18-E-119/033	Unite Group plc	Reg18-E-119
	This policy approach has now changed to recognise that requirements for new public realm floorspace are already embedded in site allocations which would result in quantitative net gains meeting the requirements of this policy. Given the range of requirements set by other parts of policy D2 which already promote optimisation of public realm on sites for major development, this part has been removed.	<p>Recommendations:</p> <ul style="list-style-type: none"> No substantive changes, though the policy does need to be more flexible to specific site circumstances. 		D2.5			D2 Public Realm Net Gain	Design	Reg18-E-119/034	Unite Group plc	Reg18-E-119

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Support noted	In principle, UEL is encouraged by the strategic vision set out in the Draft Plan, including the proposed design-led approach for future development and the proposed public realm net gain requirement for new development, addressing both quantitative and functional gains. Both of these draft policy objectives are fully supported by UEL, particularly in the context of the forthcoming UEL Stratford proposals.					D2 Public Realm Net Gain	Design	Reg18-E-117/003	University of East London	Reg18-E-117
	Support noted	A design led approach is supported by Abrdn, including residential development of an appropriate neighbourhood grain with compact urban blocks, a mix of dwelling types and range of building heights.					D3 Design-led residential site capacity optimisation	Design	Reg18-K-001/010	Abrdn	Reg18-K-001
	This mapping change has not been made. We did not consider this change to be appropriate as the Transform/Enhance/Conserve areas currently identified are not designations, and may be subject to change as the context of Newham evolves. This is clarified in the implementation text.	Anchor supports the approach in Policy D3 to allowing moderate uplifts to density while also responding to local character. To ensure the policy is effective, the policy map should show the 'transform', 'enhance' and 'conserve' areas within Newham.					D3 Design-led residential site capacity optimisation	Design	Reg18-E-050/019	Anchor	Reg18-E-050
	This wording change has been made. Please see the new wording in Policy D3.	c. D3: Design-led Residential Site Capacity Optimisation - Would you keep, change or add something to this policy? Policy broadly Supported . The policy should also look to optimise density providing no negative impact upon local character, in accordance with the NPPF. 3. All new development and extensions should integrate with wider			D3.3		D3 Design-led residential site capacity optimisation	Design	Reg18-E-070/054	Aston Mansfield	Reg18-E-070

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		neighbourhood grain, scale and massing, with scope for height increases in appropriate locations, and in line with Tall Buildings Policy D4 Suggested change to wording: 3. All new development and extensions should integrate with wider neighbourhood grain, scale and massing, with scope for density and height increases where there is no negative impact upon local character [delete: in appropriate locations], and in line with Tall Buildings Policy D4.									
	Support noted	Overall, Ballymore support the using a design-led approach to residential site capacity optimisation consistent with London Plan Policy D3 to help meet the housing delivery targets in the borough.					D3 Design-led residential site capacity optimisation	Design	Reg18-E-122/002	Ballymore	Reg18-E-122
	Comment noted	However, to ensure this approach is successful Ballymore recommend refinements to policies to allow flexible responses to policy requirements. It is in this context that the comments have been made and set out in Appendix 1 to this letter.					D3 Design-led residential site capacity optimisation	Design	Reg18-E-122/003	Ballymore	Reg18-E-122
	Comment noted. While we have tried to simplify the language used in the policies, specific terminology is necessary in order to be effectively implemented in the context of legal processes and to clearly set out expectations to building environment professionals.	[Change it] How many people actually read and understand this					D3 Design-led residential site capacity optimisation	Design	Reg18-T-084/006	Business Owner	Reg18-T-084

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-148	City of London	Reg18-E-148/015	Design	D3 Design-led residential site capacity optimisation						Draft Policy D3 (Design-led residential site capacity optimisation) outlines the requirements for all new-build residential development to comply with the Mayor of London's design-led approach, which seeks to ensure all development makes the best use of land by following a design-led approach that optimises the capacity of sites.	Comment noted
Reg18-Ae-001	East Ham Assembly	Reg18-Ae-001/188	Design	D3 Design-led residential site capacity optimisation					D1.1	Environment - design that promotes traditional streetscale features	This wording change has not been made. We did not consider this change to be necessary as the draft policies D1, D3 and D5 already promote human scale design that integrates, respects and enhances local character. However, policy D5 has now been subsumed into policy D3.
Reg18-E-130	Hadley Property Group	Reg18-E-130/081	Design	D3 Design-led residential site capacity optimisation						Hadley supports the design-led approach to designing new residential development.	Support noted
Reg18-E-130	Hadley Property Group	Reg18-E-130/082	Design	D3 Design-led residential site capacity optimisation			D3.5			However, it objects to the use of "moderate" in part 5 of the policy in describing the uplift in density. As described above in relation to Neighbourhood N8, "moderate" should be deleted as it is vague and ambiguous. It is also inconsistent with a design-led approach to optimising the use of land in line with the NPPF and London Plan recommendations	A change to this policy approach has not been made. We did not consider this change to be appropriate as the policy is intended to provide additional detail about how the design-led approach should be considered in Newham's different contexts, as recommended by the Characterisation Study (2022) that was developed in line with GLA methodology within the now published Characterisation and Growth Strategy LPG.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-147	Historic England	Reg18-E-147/021	Design	D3 Design-led residential site capacity optimisation			D3.6b			Add at end of para 6b 'which conserves character and heritage significance; and,'	This wording change has been made. Please see the new wording in Policy D3.
Reg18-E-068	Hollybrook Homes	Reg18-E-068/033	Design	D3 Design-led residential site capacity optimisation						Design D3 – Design-led Residential Site Capacity Optimisation We are supportive of the principle that all new-build residential developments must comply with the design-led approach, as set out in Policy D3 of the London Plan, which seeks to ensure that all development is of the most appropriate form and land use for the site.	Support noted.
Reg18-E-068	Hollybrook Homes	Reg18-E-068/034	Design	D3 Design-led residential site capacity optimisation					D3.1	Specifically, we consider that consideration of land use should also take into account the most appropriate land use as dictated by local market conditions in accordance with Paragraph 124 of the National Planning Policy Framework (2021) which states that planning policies should support development that makes efficient use of land, taking into account (b) local market conditions and viability	A change to this policy approach has not been made. We did not consider this change to be appropriate as the policy is intended to provide additional detail about how the design-led approach should be considered in Newham's different contexts, as recommended by the Characterisation Study (2022) that was developed in line with GLA methodology within the now published Characterisation and Growth Strategy LPG.
Reg18-E-073	Notting Hill Genesis	Reg18-E-073/011	Design	D3 Design-led residential site capacity optimisation						Design-led residential site capacity optimisation NHG support the overall approach of draft Local Plan Policy D3 (Design-led Residential Site Capacity Optimisation) which is consistent with London Plan Policy D3 (Optimising Site Capacity Through the Designled Approach).	Support noted

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 policy is intended to provide additional detail about how the design-led approach should be considered in Newham's different contexts, as recommended by the Characterisation Study (2022) that was developed in line with GLA methodology within the now published Characterisation and Growth Strategy LPG.	However, draft Policy D3 (5) states: “In areas identified as suitable for enhancement, all developments should: a. deliver <u>moderate</u> uplift in density through design which responds to the different character areas adjacent the site” The London Plan Policy D3 is clear that higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, in accordance with London Plan Policy D2 (Infrastructure requirements for sustainable densities). We consider ‘moderate’ uplift to be unnecessarily vague, as it does not provide an indication of how uplift in density will be measured. We further consider that this would constrain development as it is not consistent with the London Plan, which requires density to respond to a design-led approach.		D3.5a			D3 Design-led residential site capacity optimisation	Design	Reg18-E-073/012	Notting Hill Genesis	Reg18-E-073

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 policy is intended to provide additional detail about how the design-led approach should be considered in Newham's different contexts, as recommended by the Characterisation Study (2022) that was developed in line with GLA methodology within the now published Characterisation and Growth Strategy LPG.	<p>[Appendix D] Policy D3 Design-led residential site capacity optimisation Page 55 Proposed Suggested Amendments:</p> <p>5(a) – deliver moderate uplift in density through a design- decision led approach and design which responds to the different character areas adjacent the site</p> <p>Reason / Comment</p> <p>NHG support the overall approach of draft Local Plan Policy D3 (Design-led Residential Site Capacity Optimisation) which is consistent with London Plan Policy D3 (Optimising Site Capacity Through the Design-led Approach). However, the London Plan Policy D3 is clear that higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, in accordance with London Plan Policy D2 (Infrastructure requirements for sustainable densities).</p> <p>We consider ‘moderate’ uplift to be unnecessarily vague, as it does not provide an indication of how uplift in density will be measured. We further consider that this would constrain development as it is not consistent with the London Plan, which requires density to respond to a design-led approach.</p>		D3.5a			D3 Design-led residential site capacity optimisation	Design	Reg18-E-073/023	Notting Hill Genesis	Reg18-E-073

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted	[Change it] See previous answers [comments in relation to D1]					D3 Design-led residential site capacity optimisation	Design	Reg18-T-002/041	Resident	Reg18-T-002
	Support noted	[Keep it]					D3 Design-led residential site capacity optimisation	Design	Reg18-T-043/002	Resident	Reg18-T-043
	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. No additions have been made.	[Add to it] ?					D3 Design-led residential site capacity optimisation	Design	Reg18-T-057/010	Resident	Reg18-T-057
	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. No additions have been made.	[Add to it]					D3 Design-led residential site capacity optimisation	Design	Reg18-T-098/005	Resident	Reg18-T-098
	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. No additions have been made. However, the policy and its implementation text has changed in response to further best practice research and recommendations made by other consultees. Please see new wording in policy D3.	[Change it]					D3 Design-led residential site capacity optimisation	Design	Reg18-T-103/009	Resident	Reg18-T-103

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Support noted	Policy D3 'design-led residential site capacity optimisation' outlines the requirement for all new-build residential developments to comply with the design-led approach, as set out in London Plan (2021) Policy D3, which the Berkeley Group welcomes and supports.					D3 Design-led residential site capacity optimisation	Design	Reg18-E-136/065	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136
	A change to this policy approach has not been made. We did not consider this change to be appropriate as the policy is intended to provide additional detail about how the design-led approach should be considered in the context of Newham's different neighbourhoods, as recommended by the Characterisation Study (2022) that was developed in line with GLA methodology within the now-published Characterisation and Growth Strategy LPG.	Moreover, the suggestion of a moderate uplift in density may not be appropriate for all identified sites in Newham and a contextual design-led approach is more suitable for determining the right residential capacity for the Site, in line with the London Plan. The Berkeley Group proposed amendments to draft policy wording: 5. In areas identified as suitable for enhancement, all developments should: a. deliver moderate uplift in density, <u>determined through a design-led approach</u> which responds to the different character areas adjacent the site; and		D3.5			D3 Design-led residential site capacity optimisation	Design	Reg18-E-136/067	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
	A change to this policy approach has not been made. We did not consider this change to be appropriate as the policy is intended to provide additional detail about how the design-led approach should be considered in Newham's different contexts, as recommended by the Characterisation Study (2022) that was developed in line with GLA methodology within the now published Characterisation and Growth Strategy LPG.	D3.1 Stratford East supports the intent of the policy. However, an important element of the design-led approach in London Plan Policy D3 referenced relating to density is missing and should be incorporated. This is set out in Part B of London Plan Policy D3, where the policy states: “Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling” and “Where these locations have existing areas of high density buildings, expansion of the areas should be positively considered by Boroughs where appropriate.” Whilst reference is made to complying with London Plan Policy D3, there should also be referenced to locating higher density development in more accessible areas within the policy and clarity how it relates to the transform, enhance and conserve approach set out in the Policy.					D3 Design-led residential site capacity optimisation	Design	Reg18-E-124/009	Stratford East London Partners LLP	Reg18-E-124
	Support noted.	Stratford East supports the designation of Tall Building Zones for Stratford Waterfront at 100m and Bridgewater Triangle at 60m, which reflect the existing planning permissions and applications for				N8.SA6 Stratford Waterfront South	D3 Design-led residential site capacity optimisation	Design	Reg18-E-124/031	Stratford East London Partners LLP	Reg18-E-124

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		the sites. [Originally submitted in response to D]									
	A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).	Abrdn support the principle of tall buildings at Gallions Reach (site N1) subject to detailed design and masterplanning considerations. However, Abrdn suggest that Table 1 and Policy N1 should be robustly reviewed on a site by site basis.			Table 1: Tall Building Zones		D4 Tall buildings	Design	Reg18-K-001/011	Abrdn	Reg18-K-001

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has been made following further analysis undertaken and outlined in the Tall Buildings Annex (2024). Through this analysis and, considering the emerging context at Royal Albert Wharf, it was concluded that the 40m zone could be more suitable for the TBZ6: Albert Island.</p> <p>Please see the new wording in Policy D4.2, TBZ6: Albert Island.</p>	<p>Policy D4: Tall Buildings and Policies Map</p> <p>Our client is encouraged by the Council's emerging policy approach to support tall buildings on the development site.</p> <p>The site is located within the Tall Building Zone 6 (TBZ6: Albert Island), with a maximum height range of 32m. The further guidance section of Table 1 states that prevailing heights should be between 21m and 32m, that there is an opportunity to include tall building elements up to 32m and that this is generally subject to airport height constraints.</p> <p>The approved development site delivers three distinct zones which includes buildings with a maximum height of 42.3m and a maximum height of 7 storeys at the Ideas Factory building in the south eastern corner of the site. The height, scale and massing of the scheme was carefully considered in light of the aviation height limitations associated with City Airport. The height of the proposals was supported by Officers and Members of the Strategic Development Committee during the application's determination period and confirmed by resolution to grant approval of the scheme on 24th March 2021.</p> <p>As such, it is considered that Policy D4 and the Draft Policies Map should be updated to reflect the approved heights of the proposals at our client's</p>						Design	Reg18-E-049/006	Albert Island Regeneration Limited	Reg18-E-049

Comment Response	
Comment	development site (e.g. “opportunity to include limited tall building elements up to 43m”).
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
	A change to this policy approach has been made following further analysis undertaken and outlined in the Tall Buildings Annex (2024). Through this analysis and, considering the emerging context at Royal Albert Wharf, it was concluded that the 40m zone could be more suitable for the TBZ6: Albert Island. Please see the new wording in Policy D4.2, TBZ6: Albert Island.						D4 Tall buildings	Design	Reg18-E-049/030	Albert Island Regeneration Limited	Reg18-E-049
	Support noted. However, this policy approach has now changed following further analysis undertaken and outlined in the Tall Building Annex (2024). Through this analysis it was concluded that the 50m zones of N5.SA1 Custom House – Land surrounding Freemasons Road site allocation should be reduced to one area only to mark Custom House station and the link to the Excel conference centre. Please see new wording in TBZ12: Custom House and N5.SA1 Custom House – Land surrounding Freemasons Road site allocation.						D4 Tall buildings	Design	Reg18-E-050/008	Anchor	Reg18-E-050

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. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Policy D9 part A, in particular, requires boroughs to identify in their development plan what is considered a tall building for their specific localities. In accordance with Policy D9 part A, and based on local context analysis, Newham has defined 21m (ca. 7 storeys) as the height at which buildings become substantially taller than its surrounding. As the Newham Characterisation Study states "In the majority of Newham, with a prevailing height of up to three storeys and an extensive presence of terrace houses or semi-detached houses, 7+ storeys would be perceived as a tall building." Based on this definition of a tall building, suitable locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings	d. D4: Tall Buildings - Would you keep, change or add something to this policy? <i>1. Tall buildings in Newham are defined as those at or over 21m (roughly seven storeys), measured from the ground to the principal top of the building (usually a parapet).</i> Object to policy: The London Plan (Policy D9) states Tall Buildings should be defined upon local context, but should not be less than 6 storeys. As an Inner London Borough, and in accordance with the emerging NPPF which incorporates an uplift of the standard method for the top 20 most populated urban areas. Newham should be setting a higher benchmark for Tall buildings to enable more efficient use of land across the borough.			1		D4 Tall buildings	Design	Reg18-E-070/055a	Aston Mansfield	Reg18-E-070

Comment Response	can be found in the Tall Building Annex (2024).
Comment	
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
	A change to this policy approach has not been made. We did not consider this change to be appropriate as tall buildings outside of tall building zones will, in line with Policy D9 of the London Plan, be considered a departure from the Plan. The Master Brewer Case took place in the context of a Local Plan produced before the London Plan 2021. The Newham Local Plan is supported by a detailed evidence base to identify suitable locations for Tall Buildings, in line with London Plan Guidance. We do acknowledge there may be exceptional circumstances where through a detailed townscape and impact assessment a development that complies with Policy D9 part C of the London Plan (2021) but was outside of a Tall Building Zone could be considered acceptable if it was demonstrated that the impact on the townscape was acceptable and if the public benefits delivered would outweigh any potential harm caused to the townscape.				2		D4 Tall buildings	Design	Reg18-E-077/009	Ballymore Group	Reg18-E-077

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, whilst we acknowledge that the applicant could benefit from planning consents under the current Local Plan, the draft emerging Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough wide spatial hierarchy. More details on the methodology used to identify suitable locations and height for tall buildings can be found on the Tall Building Annex (2024). However, this policy approach has now changed to ensure a consistent approach to referencing heights in Policy D4 and the Neighbourhood policies. Please see the new wording in Table 1: Tall Building Zones, TBZ10: North Woolich Road and N2.SA3 Connaught Riverside.	In regard to tall building zone TBZ10: North Woolwich Road (which includes site allocation N3.SA3 Connaught Riverside), the draft policy sets out a 'suitable' height range maximum of 50m with prevailing heights between 21m and 32m. The proposed 50m height limit set out within draft policy D4 does not align with the 16 storey height limit set out within the draft site allocation (N3.SA3 Connaught Riverside) and would be more likely to result in a building of 14 storeys (for reference, the 15 storey buildings currently proposed on the Thames Road Industrial Estate site (also known as UNEX) are circa 56m in height). It is therefore considered that the upper appropriate height limit should be increased to circa 55m to align with the draft site allocation.			TBZ10: North Woolwich Road		D4 Tall buildings	Design	Reg18-E-077/010	Ballymore Group	Reg18-E-077

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This wording change has not been made. We did not consider this change to be appropriate as, whilst we acknowledge greater height is permissible under the adopted site allocation and that the site can still benefit from the adopted policy, the more detailed townscape work undertaken to support the emerging Local Plan, as directed by the London Plan (2021), demonstrates that greater heights would cause challenges for the delivery of Policy J1 on the adjacent SIL. However, the policy has changed to ensure the existing adjacent Strategic Industrial Location (SIL) is protected and enhanced. Please see the new wording in Table 1: Tall Building Zones, TBZ11: Lyle Park West and N2.SA2 Lyle Park West site allocation.	In regard to tall building zone TBZ11: Lyle Park West, the prevailing heights are identified to be 21m and 32m, with an opportunity to include tall building elements up to 40m. Detailed comments are provided below in relation to the draft Lyle Park West site allocation, and it is considered that the indicative heights identified within draft policy D4 should be updated in line with the adopted site allocation (i.e. indicative height range of 10-12 storeys with capacity for up to 18 storeys in key locations).		TBZ11: Lyle Park West		N3.SA2 Lyle Park West	D4 Tall buildings	Design	Reg18-E-077/011	Ballymore Group	Reg18-E-077

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”.</p> <p>Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>				2		D4 Tall buildings	Design	Reg18-E-077/012	Ballymore Group	Reg18-E-077

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>Tall Building Study (2018) has been replaced with the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. Newham Characterisation Study (2023) has been supplemented with a Tall Building Annex (2024). The document summarizes the sieving exercise that has been undertaken to identify locations where tall buildings may be an appropriate form of development and expands on the townscape assessment for each area of the borough. Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>	<p>Tall Building Evidence Base</p> <p>It is noted that the draft Local Plan does not include an updated Tall Building Study as part of its Evidence Base and instead relies on the Newham Characterisation Study as the basis for identifying locations for tall buildings. The Study does not provide any specific guidance on the locations of tall buildings in the Borough based on a methodology adopted specifically for this purpose. The information it does include is general in nature - for example at 9.3.2 Design and placement of tall buildings (p285) - and does not provide bespoke guidance on building heights specific to the Borough. It is considered that without a clear evidence base, the restrictive tall buildings policy could be found to not be Justified at examination, and further, could be seen to be inconsistent with the London Plan and NPPF.</p>		D4			D4 Tall buildings	Design	Reg18-E-121/022	Barratt London	Reg18-E-121

Reg18-E-121	Barratt London	Reg18-E-121/023	Design	D4 Tall buildings			2	D4 .3	<p>The 2021 London Plan approach to tall buildings in Policy D9 (Tall Buildings) is broadly to:</p> <ul style="list-style-type: none"> > seek Local Plan positive designation of areas appropriate for tall buildings; > allow proposals where they pass the D9(C) filters as confirmed in the Master Brewer case 1 <p>[Footnote: 1 R (London Borough of Hillingdon) v Mayor of London [2021] EWHC 3387 (Admin)]+K104</p> <p>The draft Local Plan as proposed would not be sufficiently justified with regards to tall buildings as it relies on an out of date Tall Building Study and a vague NCS. With regards to conformity with the NPPF and London Plan, the draft Tall Building Policy D4 would be far more restrictive than the policy approach in the London Plan and would depart from the NPPF, because it seeks to prohibit tall buildings over a set height in specific locations, without allowance for the filters in London Plan D9(C). It is noted that part 3 of draft local plan policy D4 references the London Plan policy criteria, but this comes after part 2 of the policy which explicitly states that tall buildings will only be acceptable in the Tall Building Zones (TBZ), presumably within the prevailing height range ascribed to each TBZ. This blanket prohibition of tall buildings outside the TBZs, and serious restriction of heights within them, is not in conformity with the correct interpretation of London Plan policy D9, as confirmed by the Master Brewer case.</p> <p>The 2004 Planning and Compulsory Purchase Act requires general conformity</p>	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as tall buildings outside of tall building zones will, in line with Policy D9 of the London Plan, be considered a departure from the Plan. The Master Brewer Case took place in the context of a Local Plan produced before the London Plan 2021. The Newham Local Plan is supported by a detailed evidence base to identify suitable locations for Tall Buildings, in line with London Plan Guidance. We do acknowledge there may be exceptional circumstances where through a detailed townscape and impact assessment a development that complies with Policy D9 part C of the London Plan (2021) but was outside of a Tall Building Zone could be considered acceptable if it was demonstrated that the impact on the townscape was acceptable and if the public benefits delivered would outweigh any potential harm caused to the townscape.</p>
-------------	----------------	-----------------	--------	-------------------	--	--	---	-------	--	---

										<p>with this overarching spatial strategy, which is intended to achieve housing supply in a housing market suffering extreme stress via the optimisation of site capacity. The NPPF approach equally promotes the effective use of land in urban areas (Paras 8, 11(a), 119) and criteria-based approach to design excellence and placemaking. We recognise these overarching objectives, which encourage a case by case analysis to optimise each site's capacity, and suggest that a restrictive tall building policy is not in conformity with this approach.</p>	
--	--	--	--	--	--	--	--	--	--	--	--

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Newham Characterisation Study (2023) has been updated and implemented with a Tall Building Annex (2024). The document summarizes the sieving exercise that has been undertaken to identify locations where tall buildings may be an appropriate form of development. The document also provides a map of the tall buildings in the pipeline in Newham and expands the townscape assessment for each area of the borough. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).	Tall Building Zones In terms of tall buildings, the map set out on p163 of the NCS is incorrect. For example, it omits the building under construction at the western end of the High Street which will reach a height of 32 storeys. Furthermore, it omits any reference to developments outside the Borough boundary, for example at City Island which is plainly an important element in the local townscape context around Canning Town Station and Canning Town Riverside.	Evidence Base: Newham Characterisation Study: Maccrannor Levington with New Practice, Avison Young and GHPA (2022)		D4		D4 Tall buildings	Design	Reg18-E-121/024	Barratt London	Reg18-E-121

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed to include the whole of the site allocation in the Canning Town neighbourhood and in the TBZ13: Canning Town. Please see the new neighbourhood boundary on the policies map and new wording in Table 1: Tall Building Zones, TBZ13: Canning Town and site allocation N4.SA5 Canning Town Riverside.					N5.SA5 Canning Town Riverside	D4 Tall buildings	Design	Reg18-E-121/025	Barratt London	Reg18-E-121
	This policy approach has now changed to include the whole of the site allocation in the Canning Town neighbourhood and in the TBZ13: Canning Town. Please see the new neighbourhood boundary on the policies map and new wording in Table 1: Tall Building Zones, TBZ13: Canning Town and site allocation N4.SA5 Canning Town Riverside.					N5.SA5 Canning Town Riverside	D4 Tall buildings	Design	Reg18-E-121/026	Barratt London	Reg18-E-121

Comment Response	
Comment	cohesive townscape strategy, this would bring the benefit of allowing more space for buildings heights to 'step up' to the Canning Town train station, which is identified within TBZ13 as having capacity for the greatest heights.
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
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum height that could be acceptable in these locations. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”.</p> <p>In line with Policy D9, Policy D4. 2 and implementation text D4.2, seek to protect the spatial hierarchy of the plan. Varying heights across Tall Building Zones allows for transitioning heights to surrounding context and sensitive areas. Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>	<p>Additionally, having identified the Site as an area suitable for tall buildings, the heights identified are without justification and are over-prescriptive. For example, the NCS identifies (p199) that the prevailing height of the TBZ is set at 21m-32m storeys with some ‘additional taller elements, up to 50m and in some places 60m’.</p> <p>While we welcome the recognition that taller buildings could rise above the specified shoulder height, at specific locations, subject to an assessment of their impact and note that this is drawn through into the draft TBZ13, there is no justification for the blanket prevailing building height, nor the other heights identified across the zone. The only justification offered is the explanation at p165 as to the ‘saturation’ of a tall building cluster in Canning Town. While the use of the word saturated could be interpreted as a pejorative, there is no explanation as to why the previous existence of tall buildings (delivered in accordance with the spatial strategy set out in the adopted development plan) should preclude subsequent buildings of a certain height. Identified heights should be based on a site specific appraisal and on that basis we strongly disagree that building heights should be limited to a blanket shoulder height of 21m-32m</p>		TBZ13: Canning Town		N5.SA5 Canning Town Riverside	D4 Tall buildings	Design	Reg18-E-121/027	Barratt London	Reg18-E-121

Comment Response	
Comment	storeys or isolated heights of 50m/60m as identified in the NCS, or a prevailing height of between 21m and 32m and isolated heights of 40m/100m as identified in the draft TBZ13.
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
	Comment noted.	In terms of the suitability of the Site for tall buildings, the applicant has undertaken extensive analysis of the site as part of the application process as described in this letter above. Additionally, the vision for Canning Town and Custom House is for a regenerated and restored neighbourhood and the ‘transformation’ of site allocations, including N5.SA5, to deliver a high level of growth. For these reasons, alongside the neighbourhood’s capacity for growth identified in the Characterisation Study, the site is suitable for tall buildings, but the restrictive maximum height of 15 storeys in the draft site allocation fails to optimise the delivery of these strategic objectives.		TBZ13: Canning Town		N5.SA5 Canning Town Riverside	D4 Tall buildings	Design	Reg18-E-121/028	Barratt London	Reg18-E-121
	Comment noted.	The development of the site for tall buildings has the potential to make a positive contribution to the skyline from various distances and viewing angles. A tiered development can provide a focus to the development with the tallest elements up to 100m tall most appropriately located adjacent to the A13. The position of taller blocks up to 100m adjacent to the A13 and river would be consistent with the emerging development pattern within Canning Town, with the transport interchange and confluence of transport infrastructure at its central locus.		TBZ13: Canning Town		N5.SA5 Canning Town Riverside	D4 Tall buildings	Design	Reg18-E-121/029	Barratt London	Reg18-E-121

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		This would also create a transition to the lower rise industrial area to the north, and development of a more human scale along Bidder Street. An appropriately planned development of a variety of heights will break down the mass with sky gaps and provide an interesting and legible form.									
	Comment noted.	At long range views, the proposed variation of building forms and heights within the Site would read as an important piece of the wider formation of the tall building cluster at the western end of Canning Town centre and in the context of other tall buildings such as City Island and the Manor Road development. A taller building in this location would appear as a new element on the skyline in these longer-range views, but will contribute positively to the developing skyline, and provide a wayfinding function for Canning Town generally. The placement of the buildings and composition would be important in creating an attractive undulating form created by City Island and the Hallsville		TBZ13: Canning Town		N5.SA5 Canning Town Riverside	D4 Tall buildings	Design	Reg18-E-121/030	Barratt London	Reg18-E-121

Comment Response	
Comment	Quarter, with the tallest elements on the Site up to 100m acting as a counterpoint to the Manor Road development. There would be no adverse impacts on heritage assets arising from buildings up to 100m on the Site.
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
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”.</p> <p>Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>						D4 Tall buildings	Design	Reg18-E-121/042	Barratt London	Reg18-E-121

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these location. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”.</p> <p>Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>				TBZ13: Canning Town	N5.SA5 Canning Town Riverside	D4 Tall buildings	Design	Reg18-E-121/043	Barratt London	Reg18-E-121

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>Tall Building Study (2018) has been replaced with the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. Newham Characterisation Study (2023) has been supplemented with a Tall Building Annex (2024). The document summarizes the sieving exercise that has been undertaken to identify locations where tall buildings may be an appropriate form of development and expands on the townscape assessment for each area of the borough. Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>				D4	N5.SA5 Canning Town Riverside	D4 Tall buildings	Design	Reg18-E-121/046	Barratt London	Reg18-E-121

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Newham Characterisation Study (2023) has been updated and supplemented with a Tall Building Annex (2024). The document summarizes the sieving exercise that has been undertaken to identify locations where tall buildings may be an appropriate form of development and expands on the townscape assessment for each area of the borough. Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).	<ul style="list-style-type: none"> The draft Local Plan appears to rely on the Newham Characterisation Study 2022 as the basis as identifying locations for tall buildings. The Study does not provide any specific guidance on the locations of tall buildings in the Borough based on a methodology adopted specifically for this purpose. The information it does include is general in nature, for example at 9.3.2 Design and placement of tall buildings, and does not provide bespoke guidance on building heights specific to the Borough. 	Evidence Base: Newham Characterisation Study: Maccrannor Levington with New Practice, Avison Young and GHPA (2022)		D4		D4 Tall buildings	Design	Reg18-E-121/047	Barratt London	Reg18-E-121

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Newham Characterisation Study (2023) has been updated and supplemented with a Tall Building Annex (2024). The document summarizes the sieving exercise that has been undertaken to identify locations where tall buildings may be an appropriate form of development. The document also provides a map of the tall buildings in the pipeline in Newham and expands on the townscape assessment for each area of the borough. Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).	In terms of tall buildings, the map set out on p163 of the Study is incorrect. For example, it omits the building under construction at the western end of the High Street to a height of 32 storeys. Furthermore, it omits any reference to developments outside the Borough boundary, for example at City Island which is plainly an important element in the local townscape context around Canning Town Station and Canning Town Riverside.	Evidence Base: Newham Characterisation Study: Maccrannor Levington with New Practice, Avison Young and GHPA (2022)		D4		D4 Tall buildings	Design	Reg18-E-121/052	Barratt London	Reg18-E-121

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Newham Characterisation Study (2023) has been updated and supplemented with a Tall Building Annex (2024). The document summarizes the sieving exercise that has been undertaken to identify locations where tall buildings may be an appropriate form of development. The document also provides a map of the tall buildings in the pipeline in Newham and expands on the townscape assessment for each area of the borough. Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).				TBZ13: Canning Town	N5.SA5 Canning Town Riverside	D4 Tall buildings	Design	Reg18-E-121/054	Barratt London	Reg18-E-121

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Newham Characterisation Study (2023) has been updated and supplemented with a Tall Building Annex (2024). The document summarizes the sieving exercise that has been undertaken to identify locations where tall buildings may be an appropriate form of development. The document also provides a map of the tall buildings in the pipeline in Newham and expands on the townscape assessment for each area of the borough. Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).			TBZ13: Canning Town		N5.SA5 Canning Town Riverside	D4 Tall buildings	Design	Reg18-E-121/055	Barratt London	Reg18-E-121

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted.	<p>SUMMARY</p> <ul style="list-style-type: none"> • Barratt East London are generally supportive of the draft Local Plan, although firmly believe that further modifications are required in order for it to be found sound in terms of being Positively Prepared; Justified, Effective and Consistent with the 2021 National Planning Policy Framework (the Framework). • The 2021 London Plan approach to tall buildings in Policy D9 (Tall Buildings) is broadly to: <ul style="list-style-type: none"> o seek Local Plan positive designation of areas appropriate for tall buildings; o allow proposals where they pass the D9(C) filters (confirmed in the Master Brewer case[1]). [Footnote text: [1] R (London Borough of Hillingdon) v Mayor of London [2021] EWHC 3387 (Admin)] • The draft Local Plan as proposed would be far more restrictive than the policy approach in the London Plan and would depart from the Framework, because it seeks to prohibit tall buildings over a set height in specific locations without an evidence base, which is as a result not Justified. It also does not make allowance for application of the London Plan D9(C) filters, which as a result is not in conformity with the London Plan or consistent with the Framework approach to see effective use of land in urban areas and criteria-based approach to 			2	N5.SA5 Canning Town Riverside	D4 Tall buildings	Design	Reg18-E-121/060	Barratt London	Reg18-E-121

Comment Response	
Comment	<p>design excellence noted above.</p> <ul style="list-style-type: none"> • The 2004 Planning and Compulsory Purchase Act requires general conformity with this overarching spatial strategy, which is intended to achieve housing supply in a housing market suffering extreme stress through optimisation of site capacity. The Framework approach equally promotes the effective use of land in urban areas (Paras 8, 11(a), 119) and criteria-based approach to design excellence and placemaking. We recognise this approach as being a means of achieving good place-making and increasing housing supply / optimising capacity.
Implementation	
Justification	
Clause	
Introduction	
Site allocation	
Policy	
Chapter	
Comment Reference	
Representor	
Representation Reference	

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-108	Bellway Homes Limited	Reg18-E-108/027	Design	D4 Tall buildings	N8.SA9 Pudding Mill		TBZ18: Stratford High Street			<p>3. Other Key Policies</p> <p>Tall Buildings</p> <p>Policy D4 of the draft plan details the tall building zones across the borough. Site allocation N8.SA9 falls under tall building zone TBZ18: Stratford High Street which has a maximum height range of '50m and 40m and 32m in the defined areas.'</p> <p>Bellway supports the principle of setting out height zones, however, for reasons set out earlier, we believe that their Phase 3 site is capable of delivering up to 60 metres (20 storeys). Precedent to taller building are within the wider areas and plans are submitted which show how this appropriate on the island with the intention to optimised housing output.</p> <p>[see page 8 of re for image]</p> <p>Figure 4: Tall Building Zone Map. The site falls within TBZ18 and is surrounded with a dashed red line indicating an ability to accommodate 50 metres.</p>	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as, based on the sieving exercise to identify tall building locations and maximum heights, N8.SA9 site allocation is not considered an appropriate location to accommodate greater heights. The maximum permissible height seeks to preserve the spatial hierarchy aspiration of the plan and a gradual transition to the surrounding context.</p> <p>More details on the methodology used to identify suitable locations and height for tall buildings can be found in the Tall Building Annex (2024).</p> <p>However, the wording has been changed due to other representations. Please see the new wording in Table 1: Tall Building Zones, TBZ18: Stratford High Street and relevant site allocations including N8.SA9 Pudding Mill.</p>
Reg18-T-084	Business Owner	Reg18-T-084/007	Design	D4 Tall buildings			D4			[Change it] It makes no difference	Unfortunately, it was not clear what change you wanted to make to this part of the Plan. No changes have been made.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to ensure the impact of tall buildings on watercourses are considered in line with policies GWS2 and GWS3, which require development proposals for tall buildings to demonstrate consideration of the impact on biodiversity and existing and proposed public open space, including watercourses. Please see the new wording in implementation text D4.3, TBZ TBZ15: West Ham Station, TBZ16: Abbey Mills, TBZ18: Stratford High Street and relevant site allocations N7.SA1 Abbey Mills and N7.SA2 Twelvetrees Park and Former Bromley By Bow Gasworks.</p>	<p>Policy D4: Tall Buildings Page 61 - Tall Building Zone 15: West Ham Station, Neighbourhood N7 Three Mills, and Site Allocation N7 SA2. Parcelforce site This section suggests "Along the railway line and Bow Creek (River Lea) and to mark West Ham station, opportunity to include limited tall building elements of up to 100m, which are sufficiently spaced to allow for views and space around the listed gasholders". The Trust is concerned about tall buildings close to waterways and the potential impacts of these, for example: visual dominance, wind and microclimate for the towpath and waterspace (which can affect navigation of shallow bottomed boats); and overshadowing, which can affect phytoplankton growth and the food chain for other wildlife, as well as amenity of the towpath. We would expect waterside developments to consider these impacts on the waterway corridor. Environmental appraisals often only consider overshadowing of adjacent residential properties (though not boats) and classify the waterspace as an amenity area, requiring just 2 hours of direct sunlight on 21st March.</p>			TBZ15: West Ham Station	N7.SA2 Parcelforce	D4 Tall buildings	Design	Reg18-E-143/007	Canal and River Trust	Reg18-E-143

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
						TBZ16: Abbey Mills	D4 Tall buildings	Design	Reg18-E-143/008	Canal and River Trust	Reg18-E-143
	This policy approach has now changed to ensure the impact of tall buildings on watercourses are considered in line with policies GWS2 and GWS3, which require development proposals for tall buildings to demonstrate consideration of the impact on biodiversity and existing and proposed public open space, including watercourses. Please see the new wording in implementation text D4.3, TBZ TBZ15: West Ham Station, TBZ16: Abbey Mills, TBZ18: Stratford High Street and relevant site allocations N7.SA1 Abbey Mills and N7.SA2 Twelvetrees Park and Former Bromley By Bow Gasworks.										
						TBZ18: Stratford High Street	D4 Tall buildings	Design	Reg18-E-143/009	Canal and River Trust	Reg18-E-143
	This policy approach has now changed to ensure the impact of tall buildings on watercourses are considered in line with policies GWS2 and GWS3, which require development proposals for tall buildings to demonstrate consideration of the impact on biodiversity and existing and proposed public open space, including watercourses. Please see the new wording in implementation text D4.3, TBZ TBZ15: West Ham Station, TBZ16: Abbey Mills, TBZ18: Stratford High Street and relevant site allocations N7.SA1 Abbey Mills and N7.SA2 Twelvetrees Park and Former Bromley By Bow Gasworks.										

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum height that could be acceptable in these locations. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. Furthermore, in line with Policy D9 part c of the London Plan (2021), Policy D4.3 and implementation text D4.3 are clear that development proposals for tall buildings will only be acceptable if they address visual, functional, environmental and cumulative impact.</p> <p>Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>						D4 Tall buildings	Design	Reg18-E-075/010	Developer	Reg18-E-075

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Due to its emerging context, its District Centre designation with a high level of public transport accessibility, and its capacity for growth within the Royal Dock & Beckton Riverside Opportunity Area, the Limmo site has been identified as a suitable area for tall buildings. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p> <p>The impacts of overlooking and loss of privacy, overshadowing, and overbearing massing on neighbouring residential properties are addressed in Policy D7.3 and they will be assessed during the masterplanning and the planning application process.</p>					N5.SA4 Limmo	D4 Tall buildings	Design	Reg18-E-005/002	Duilio & Elizabeth	Reg18-E-005

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Support noted.	D4.3					D4 Tall buildings	Design	Reg18-E-145/079	Environment Agency	Reg18-E-145
	This policy approach has now changed to ensure the impact of tall buildings on watercourse and open spaces are considered in line with policies GWS2 and GWS3, which are requiring development proposal for tall buildings to demonstrate consideration of the impact on biodiversity, existing and proposed public open space, including watercourses. Please see the new wording in implementation text D4.3 and in relevant site allocation design principles.	D4.3					D4 Tall buildings	Design	Reg18-E-145/080	Environment Agency	Reg18-E-145
	This wording change has been made. Please see the new wording in implementation text D4.3.	D4.3					D4 Tall buildings	Design	Reg18-E-145/081	Environment Agency	Reg18-E-145

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted.	particular, we object to Policy D4: Tall Buildings. The arguments put forward relate specifically to the Abbey House site, but this is used as a case study that serves to demonstrate why greater flexibility should be included within the policy. An explanation detailing the reasons for our objections are set out in the letter below and a suggested re-wording of the policy is provided.		D4			D4 Tall buildings	Design	Reg18-E-071/002	Finebeam Ltd	Reg18-E-071

Reg18-E-071	Finebeam Ltd	Reg18-E-071/004	Design	D4 Tall buildings			2		<p>Policy D4(2) of LB Newham's draft Local Plan states that: "Tall buildings will only be acceptable, subject to detailed design and masterplanning considerations, in areas marked on the Policies Map as 'Tall Building Zones'. The height of tall buildings in any 'Tall Buildings Zone' should not exceed the respective limits set in Table 1 below."</p> <p>We consider this to be inappropriate for a range of reasons. First, the policy is not positively prepared, as it does not seek to meet the area's objectively assessed needs. In June 2022, LB Newham published its Strategic Housing Market Assessment (SHMA). The SHMA concludes that LB Newham has an objectively assessed need for 4,760 dwellings per annum. Evidence from the Housing Delivery Test published in January 2022 revealed that LB Newham delivered 2,678 homes in 2018/19, 3,572 in 2019/20 and 1,830 in 2020/21. While this surpassed the targets in the Housing Delivery Test, it falls short of the 4,760 dwellings per annum identified by the Council's own evidence base. To meet the housing need set out in the SHMA, sites such as the Abbey House site must be optimised, by constructing the buildings at a high density. Abbey House is no longer defined as falling within a Tall Building Zone, despite it being with the Arc of Opportunity designation in the adopted Local Plan and its highly sustainable location adjacent to a DLR station. Under the current policy wording, a Tall Building – defined by draft Policy D4(1) as those over 21 metres (roughly seven storeys) – would</p>	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as, based on the sieving exercise undertaken to identify suitable locations for tall buildings across the borough, and due to its location in a low rise context, to which TBZ18: Stratford High Street should provide a sensitive transition, the site is not considered suitable to accommodate tall buildings developments. More details on the methodology used to identify suitable locations for tall buildings can be found on the Tall Building Annex (2024).</p>
-------------	--------------	-----------------	--------	-------------------	--	--	---	--	---	--

									<p>be prohibited on the site according to the wording of draft Policy D4(2). The optimisation of sites such as Abbey House through high density development is supported by London Plan Policy H1(b), which sets out a strategy to “<u>optimise</u> the potential for housing delivery on all suitable and available brownfield sites”¹ (emphasis added). London Plan Policy H1(b) specifies sites which are considered especially appropriate for such optimisation including: “sites with existing or planning public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station or town centre boundary”². The Abbey House site has a PTAL of 4 and is directly adjacent to the Abbey Road DLR station and is therefore defined by the London Plan as a site especially suitable for optimisation at a high density. Any development proposal that would optimise the site would need to include elements taller than seven storeys. Applying flexibility to draft Policy D4 to allow a taller development on such appropriate sites would enable the Council to meet its objectively assessed need for housing. In turn, the plan would become positively prepared. National policy offers a similar sentiment. Paragraph 125(a) of the NPPF states that “plans should <u>optimise</u> the use of land in their area and meet as much of the identified need for housing as possible”³ (emphasis added). LB Newham’s draft Local Plan is therefore inconsistent with national policy, as a development with less than seven storeys would not optimise the Abbey House</p>	
--	--	--	--	--	--	--	--	--	---	--

										site. 1 London Plan (2021), p.157 2 London Plan (2012), p.157 3 NPPF (2021), p.37	
--	--	--	--	--	--	--	--	--	--	--	--

Reg18-E-071	Finebeam Ltd	Reg18-E-071/005	Design	D4 Tall buildings		2		<p>Contrary to the wording of LB Newham's draft Policy D4, London Plan Policy D9(B3) states that: "Tall buildings <u>should</u> only be developed in locations that are identified as suitable in Development Plans"⁴ (emphasis added). This wording builds in flexibility to allow for the possibility that a tall building might be appropriate in an area. This interpretation of London Plan Policy D9 was scrutinised and verified by the High Court via the Hillingdon Judgement 5 in December 2021. In Hillingdon, Lang J concluded the policy is not to be applied such that Tall Buildings can only be proposed in designated zones within the Local Plan:</p> <p>"In considering whether to grant planning permission for a tall building which did not comply with paragraph B(3), because it was not identified in the development plan, it would surely be sensible, and in accordance with the objectives of Policy D9, for the proposal to be assessed by reference to the potential impacts which are listed in Part C. The Claimant's interpretation leads to the absurd result that a decision-maker in those circumstances is not permitted to have regard to Part C, and must assess the impacts of the proposal in a vacuum."⁶</p> <p>Therefore, the proper application of London Plan Policy D9 is that Tall Buildings can be proposed in areas outside of Tall Building Zones, provided that they meet the requirements of Part C of the Policy. The wording of LB Newham's draft Policy D4 contradicts London Plan Policy D9 and hence it cannot be considered to be sound.</p>	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as tall buildings outside of tall building zones will, in line with Policy D9 of the London Plan, be considered a departure from the Plan. The Master Brewer Case took place in the context of a Local Plan produced before the London Plan 2021. The Newham Local Plan is supported by a detailed evidence base to identify suitable locations for Tall Buildings, in line with London Plan Guidance. We do acknowledge there may be exceptional circumstances where through a detailed townscape and impact assessment a development that complies with Policy D9 part C of the London Plan (2021) but was outside of a Tall Building Zone could be considered acceptable if it was demonstrated that the impact on the townscape was acceptable and if the public benefits delivered would outweigh any potential harm caused to the townscape.</p>
-------------	--------------	-----------------	--------	-------------------	--	---	--	---	---

										<p>It is also worth highlighting that LB Wandsworth recently overcame the same contradiction through the Public Examination of its Local Plan in November 2022. LB Wandsworth's draft Local Plan contains draft Policy LP4, which – prior to the Local Plan Hearings – included the following:</p> <p>“C. Proposals for tall buildings will not be permitted outside the identified tall building zones”</p> <p>However, LB Wandsworth acknowledged through the Examination process that the policy contradicted the London Plan and that Tall Buildings may be appropriate outside of their Tall Building Zones. In response, LB Wandsworth have reworded draft Policy LP4(C) as follows:</p> <p>“C. The Council will seek to restrict Pproposals for tall buildings will not be permitted outside the identified tall building zones” (emphasis added)</p> <p>4 London Plan (2021), p. 138 5 London Borough of Hillingdon v Mayor of London [2021] EWHC 3387 (Admin) 6 Hillingdon, para 85</p>	
--	--	--	--	--	--	--	--	--	--	--	--

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this wording approach has not been made. We did not consider this change to be appropriate as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and Policy D9 part B (3) clearly states "Tall buildings should only be developed in locations that are identified as suitable in Development Plans.". Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).				2		D4 Tall buildings	Design	Reg18-E-071/006	Finebeam Ltd	Reg18-E-071

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. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Based on the sieving exercise undertaken to identify suitable locations for tall buildings across the borough and, due to its District Centre designation, in a transform area with a high level of accessibility, the TBZ2: Green Street is considered suitable to accommodate tall building developments. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024). This does not mean a tall building will come forward on this site. Our Colleagues in the regeneration team are still working with residents to establish the preferred development option for Queen's Market and Hamara Ghar.					N14.SA1 Queen's Market	D4 Tall buildings	Design	Reg18-E-131/005	Friends of Queens Market	Reg18-E-131

Reg18-E-114	GLP (International Business Park, Rick Roberts Way)	Reg18-E-114/010	Design	D4 Tall buildings			TBZ18: Stratford High Street		<p>The need for tall buildings</p> <p>Policy J2: New employment floorspace states that development proposals at Local Industrial Locations must intensify site use to deliver a net increase in industrial floorspace through the most appropriate intensification typology. Supporting paragraph J2.1 highlights that, as directed by the Employment Land Review (2022) and in line with London Plan Policy E7, schemes proposing industrial intensification are expected to explore the scope for multi-deck development as a priority followed by other formats (including, but not limited to, stacked units, higher plot ratios, or more intensive internal arrangements intensification where appropriate).</p> <p>Policy D4: Tall buildings sets out the definition of a tall building (which is consistent with the London Plan and supported) and outlines the designated Tall Building Zones within the borough where tall buildings will be acceptable. Point 2 of Policy D4 states that ‘the height of tall buildings in any ‘Tall Buildings Zone’ should not exceed the respective limits set out in Table 1’.</p> <p>[Table inserted: Table 2 – Draft Newham Local Plan Table 1: Tall Building Zones]</p> <ul style="list-style-type: none"> - Tall building Zone: TBZ18: Stratford High Street - Neighbourhood: N7 Three Mills and N8 Stratford and Maryland - Site allocation(s): N7.SA3 Sugar House 	This was an error and has now been corrected. Please see the new map in Policy D4.
-------------	--	-----------------	--------	-------------------	--	--	---------------------------------	--	---	--

										<p>Island N8.SA3 Greater Carpenters District N8.SA4 Stratford High Street Bingo Hall N8.SA7 Rick Roberts Way N8.SA8 Bridgewater Road N8.SA9 Pudding Mill</p> <p>- Height Range: Maximum: 50m and 40m and 32m in the defined areas.</p> <p>- Further Guidance:</p> <ul style="list-style-type: none"> • Prevailing heights between 21m and 32m, except at the lower scale edges of the tall building zone, hereprevailing heights should be between 9m and 21m. • Opportunity to include limited tall building elements of up to 50m, apart from in defined 32m and 40m areas. • Tall elements in the 32m area and/or in close proximity to the conservation areas should be limited in number and will only be acceptable if their impact on the settings of the conservation area is minimized. • All tall buildings must be of a lower height than the existing tall buildings and consider the cumulative impact with existing tall buildings to avoid saturating the skyline. <p>The Site is located within Tall Building Zone 18 and is partially identified as having maximum building heights of 32m. However, following discussions with Newham Officers, we understand that the draft policies map is inaccurate and that the true extent of Tall Building Zone 18 across the site is as shown below in Figure 2.</p> <p>[Image inserted - Figure 2 - True extent of Tall Building Zone 18 across site].</p>	
--	--	--	--	--	--	--	--	--	--	---	--

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference	
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. Based on the methodology used to identify suitable locations and maximum heights for tall buildings, and due to its proximity to the Three Mills conservation area, the site is not considered suitable to accommodate greater heights. The maximum permissible heights seek to preserve the spatial hierarchy aspiration of the plan and the gradual transition to the surrounding context. With regards to the requirements in J1 and J2 to intensify industrial land, this would still be in the context of delivering good, context specific, design that protects the local townscape. Greater levels of intensification could be delivered on the part of the site covered by the 32m tall building designation. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>	<p>In order to meet the Draft Local Plan’s targets for new industrial land and jobs, we advocate a more flexible attitude towards building heights - one that is guided by a design-led approach in line with the London Plan, rather than restrictive maximum heights.</p> <p>In the context of the Site, we believe that the restriction of maximum building heights being limited to 32m is ineffective. This is because the height specified limits the ability of achieving targets of intensification through multi-deck development, which supporting paragraph J2.1 affirms all industrial development should pursue as a priority. Furthermore, it is overly prescriptive and based on limited townscape analysis and technical assessments at this stage.</p> <p>We therefore consider there should be flexibility on heights in relation to the Site, and across all industrial sites designated for intensification, given the policy context. As above, an alternative approach which requires building heights to be guided by a design-led approach would be more appropriate.</p>			TBZ18: Stratford High Street			D4 Tall buildings	Design	Reg18-E-114/011	GLP (International Business Park, Rick Roberts Way)	Reg18-E-114

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as, based on the methodology used to identify suitable locations and heights for tall buildings, and due to its proximity to the Three Mills conservation area, it is not considered appropriate to extend the TBZ18: Stratford High Street designation across the whole of the International Business Park.</p> <p>With regards to the requirements in J1 and J2 to intensify industrial land, this would still be in the context of delivering good, context specific, design that protects the local townscape. Greater levels of intensification could be delivered on the part of the site covered by the 32m tall building designation. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>				TBZ18: Stratford High Street		D4 Tall buildings	Design	Reg18-E-114/012	GLP (International Business Park, Rick Roberts Way)	Reg18-E-114

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 Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development. Locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).	To meet the Draft Local Plan's requirement of Local Industrial Locations being intensified, we believe that a flexible attitude to development that is guided by a design-led approach should be taken, as opposed to the current approach to specify maximum building heights. In the context of the Site, we believe that the Draft Local Plan's Tall Building Zone 18 should be amended to omit the specified maximum height of 32m and rather provide the ability for appropriate heights to be established by detailed townscape analysis and technical assessments as part of a planning application.		TBZ18: Stratford High Street			D4 Tall buildings	Design	Reg18-E-114/019	GLP (International Business Park, Rick Roberts Way)	Reg18-E-114

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-114	GLP (International Business Park, Rick Roberts Way)	Reg18-E-114/020	Design	D4 Tall buildings			TBZ18: Stratford High Street			Moreover, the extent of the Tall Building Zone should extend further to include the Mercedes garage to encourage the intensification of the Site in its entirety in line the LIL17: Rick Roberts Way designation and Policy J2.	A change to this policy approach has not been made. We did not consider this change to be appropriate as, based on the methodology used to identify suitable locations and maximum heights for tall buildings, and due to its proximity to the Three Mills conservation area, it is not considered appropriate to extend the TBZ18: Stratford High Street designation across the whole of the International Business Park. Opportunities for industrial intensification, in accordance with Policy J1 and Policy J2 are provided in the part of the site covered by the 32m tall building designation. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).
Reg18-E-113	GLP (Land at Central Thameside West and Former Allnex site)	Reg18-E-113/003	Design	D4 Tall buildings	New site		Table 1: Tall Building Zones			[The scope of these representations will focus on the following matters:] • The shortcomings of the proposed tall buildings designation in meeting the need for industrial intensification and the lack of recognition for the evolving character of the Site and surroundings, and its low sensitivity to change; [Referring to Land at Central Thameside West and Former Allnex site]	Comment noted.
Reg18-E-113	GLP (Land at Central Thameside West and Former Allnex site)	Reg18-E-113/006	Design	D4 Tall buildings	New site		Table 1: Tall Building Zones			Comments on the suitability of the Site for a Tall Building Zone have had input from our townscape consultant, Neaves Urbanism.	Comment noted.

Reg18-E-113	GLP (Land at Central Thameside West and Former Allnex site)	Reg18-E-113/014	Design	D4 Tall buildings	New site		Table 1: Tall Building Zones		<p>The shortcomings of the proposed tall buildings designation in meeting the need for industrial intensification and the lack of recognition for the evolving character of the Site and surroundings, and its low sensitivity to change</p> <p>Draft Policy D4 (Tall buildings) defines a tall building in Newham as those over 21m and defines on the draft Policies Map where Tall Building Zones (TBZs) are proposed to be located. TBZs are where tall buildings are proposed to be acceptable in principle and each TBZ includes height limits. The Site is not proposed to be located within a TBZ.</p> <p>The evidence base supporting draft Policy D4 is the Newham Characterisation Study (2022) (the Study). The Study recognises that the “Royal Docks character area is rapidly changing and redeveloping from its past industrial character to a mixed-use residential one, with various forms of residential typologies existing within the character area” (page 77). It identifies that the site and its immediate context can accommodate significant change as it is identified as having a “less successful quality of urban form and character” (page 142). It does not fall within an area that would be sensitive to change (page 144) and has been recognised as having a high opportunity for growth (page 146). The Site is located in a “Transform” location on the map on page 151, reflecting its opportunity for industrial intensification.</p> <p>The Site does not fall within designated</p>	<p>This policy approach has now changed following further analysis undertaken and outlined in the Tall Buildings Annex (2024). Through this analysis it was concluded that the 50m zone of TBZ13: Canning Town could be extended to recognise the suitability of the site for tall building developments and its industrial intensification opportunity in line with Policy J1 and J2 whilst preserving the spatial hierarchy aspiration for the borough and Canning Town area.</p> <p>Newham Characterisation Study (2023) has been supplemented with a Tall Building Annex (2024). The document summarizes the sieving exercise that has been undertaken to identify locations where tall buildings may be an appropriate form of development.</p> <p>Based on the sieving exercise undertaken to identify suitable locations for tall buildings across the borough and, due to its location in the Royal Docks and Beckton Riverside Opportunity Area, the Site is considered suitable to accommodate tall building development, subject to airport height constraints.</p> <p>More details on the methodology used to identify suitable locations for tall buildings can be found on the Tall Building Annex (2024).</p> <p>Please see the new wording in Table 1: Tall Building Zones, TBZ13: Canning Town.</p>
-------------	---	-----------------	--------	-------------------	----------	--	------------------------------	--	---	--

										<p>LB Newham or RB Greenwich local views, or a London View Management Framework strategic London Panorama, so having taller buildings within it would “not adversely affect local or strategic views”, in accordance with the London Plan’s Policy D9 requirement. The Site does not fall within a conservation area or within an Area of Townscape Value, so development of tall buildings is unlikely to result in an adverse impact on heritage assets.</p> <p>The evolving context surrounding the site includes mid-rise and taller buildings, such as the approved developments at Thameside West and Lyle Park West which sit either side of the Site and will rise up to 96m and 65.8m AOD respectively. The image below shows the consented context with the Site in between. The spot heights within the Site represent the aviation constraints associated with London City Airport. [Image attached]</p> <p>Extending the TBZ into the Site would reflect the Opportunity Area designation, the emerging ‘transformation’ character of the Royal Victoria Neighbourhood Area and would create an opportunity to improve its urban form and character, which accords with the methodology for defining TBZs as set out within the Study (page 165).</p>	
--	--	--	--	--	--	--	--	--	--	--	--

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference	
	<p>This policy approach has now changed following further analysis undertaken and outlined in the Tall Buildings Annex (2024). Through this analysis it was concluded that the 50m zone of TBZ13: Canning Town could be extended to recognise the suitability of the site for tall buildings development and its industrial intensification opportunity in line with Policy J1 and J2 whilst preserving the spatial hierarchy aspiration for the borough and Canning Town area. However, the approach you have suggested has not resulted in a change. We did not consider this change to be appropriate as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and Policy D9 part B (3) clearly states “Tall buildings should only be developed in locations that are identified as suitable in Development Plans.”. Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>	<p>Furthermore, given the requirement in draft Policy J2 (New employment floorspace) to actively pursue stacked industrial scenarios, the de facto proposed height limit for the Site of 21m limit appears at odds with the industrial intensification objectives of the draft Plan and the London Plan. In reality, any stacked logistics development of more than one storey is likely to exceed 21m owing to the floor to ceiling heights required in the market. The current planning application proposal for a 3-storey warehouse development is 42m AOD and this has been considered acceptable in principle by Council officers and the Design Review Panel.</p> <p>We consider that there should be flexibility on heights across industrial sites designated for intensification given the policy context.</p>			1		New site	D4 Tall buildings	Design	Reg18-E-113/015	GLP (Land at Central Thameside West and Former Allnex site)	Reg18-E-113

Comment Response	Please see the new wording in Table 1: Tall Building Zones, TBZ13: Canning Town.
Comment	
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
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”.</p> <p>Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>				2	New site	D4 Tall buildings	Design	Reg18-E-113/016	GLP (Land at Central Thameside West and Former Allnex site)	Reg18-E-113

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-113	GLP (Land at Central Thameside West and Former Allnex site)	Reg18-E-113/017	Design	D4 Tall buildings	New site		TBZ11: Lyle Park West TBZ13: Canning Town			Given the conclusions of the Newham Characterisation Study that the Site is not in a location that is sensitive to development of tall buildings and indeed that it is in a location identified for transformation, the draft Plan's approach to TBZs should be re-considered in the context of the draft Plan and London Plan industrial intensification objectives. We request that either TBZ11 (Lyle Park West) or TBZ13 (Canning Town) is extended to cover the Site.	This policy approach has now changed following further analysis undertaken and outlined in the Tall Buildings Annex (2024). Through this analysis it was concluded that the 50m zone of TBZ13: Canning Town could be extended to recognise the suitability of the site for tall buildings development and its industrial intensification opportunity in line with Policy J1 and J2 whilst preserving the spatial hierarchy aspiration for the borough and Canning Town area. Please see the new wording in Table 1: Tall Building Zones, TBZ13: Canning Town.
Reg18-E-113	GLP (Land at Central Thameside West and Former Allnex site)	Reg18-E-113/018	Design	D4 Tall buildings	New site		Table 1: Tall Building Zones			We also request that further discussions are held with LBN policy and development management officers to agree on an appropriate maximum building height for the Site, given the industrial intensification opportunity and the aviation constraints associated with London City Airport.	This policy approach has now changed following further analysis undertaken and outlined in the Tall Buildings Annex (2024). Through this analysis it was concluded that the 50m zone of TBZ13: Canning Town could be extended to recognise the suitability of the site for tall buildings development and its industrial intensification opportunity in line with Policy J1 and J2 whilst preserving the spatial hierarchy aspiration for the borough and Canning Town area. Please see the new wording in Table 1: Tall Building Zones, TBZ13: Canning Town.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	In this context we would note that in early pre-application discussions with LBN officers and the Design Review Panel in relation to our proposed data centre development, no in principle concerns have been raised with building heights of circa 65m AOD across the Site, which in our view would appropriately mediate between the taller emerging mixed-use developments either side of the Site.			Table 1: Tall Building Zones		New site	D4 Tall buildings	Design	Reg18-E-113/019	GLP (Land at Central Thameside West and Former Allnex site)	Reg18-E-113
	This policy approach has now changed following further analysis undertaken and outlined in the Tall Buildings Annex (2024). Through this analysis it was concluded that the 50m zone of TBZ13: Canning Town could be extended to recognise the suitability of the site for tall buildings development and its industrial intensification opportunity in line with Policy J1 and J2 whilst preserving the spatial hierarchy aspiration for the borough and Canning Town area. Please see the new wording in Table 1: Tall Building Zones, TBZ13: Canning Town.										
	Recommendation 2: That either TBZ11 (Lyle Park West) or TBZ13 (Canning Town) is extended to cover the Site and that further joint discussions are held with LBN policy and development management officers to agree on an appropriate maximum building height for the Site.			TBZ11: Lyle Park West TBZ13: Canning Town		New site	D4 Tall buildings	Design	Reg18-E-113/020	GLP (Land at Central Thameside West and Former Allnex site)	Reg18-E-113
	This policy approach has now changed following further analysis undertaken and outlined in the Tall Buildings Annex (2024). Through this analysis it was concluded that the 50m zone of TBZ13: Canning Town could be extended to recognise the suitability of the site for tall buildings development and its industrial intensification opportunity in line with Policy J1 and J2 whilst preserving the spatial hierarchy aspiration for the borough and Canning Town area. Please see the new wording in Table 1: Tall Building Zones, TBZ13: Canning Town.										

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Support noted.						D4 Tall buildings	Design	Reg18-E-093/027	Greater London Authority	Reg18-E-093
	This wording change has been made. Please see the new wording in TBZ19: Stratford Central and TBZ20: Chobham Manor/East Village.						D4 Tall buildings	Design	Reg18-E-093/028	Greater London Authority	Reg18-E-093
	Comment noted. The Tall Building Zones have always been included in the policies map, an interactive zoomable version of which is available online. Due to the detail included on the zones, this remains the clearest place for interested stakeholders to view the areas subject to policy D4.						D4 Tall buildings	Design	Reg18-E-093/029	Greater London Authority	Reg18-E-093

Reg18-E-130	Hadley Property Group	Reg18-E-130/031	Design	D4 Tall buildings	N8.SA5 Stratford Town Centre West		Table 1: Tall Building Zones			<p>Hadley objects to the inclusion of statement that the maximum height range for tall buildings in N8.SA5 should be 30 storeys. This prescriptive approach is not justified by evidence, nor it is consistent with a Metropolitan Town Centre designation with an international ambition.</p> <p>As proposed by our comments on Policy D4: Tall Buildings, Hadley suggests that the site allocation should reflect that the height of tall buildings should be determined by a design-led approach taking account of the need for high quality designs that reflect the characteristics of a site and the technical performance of buildings.</p> <p>Hadley propose that the references to heights in Table 1: Tall Building Zones should state that height ranges are “indicative” rather than “maximum”, and that that the site allocations should reflect this approach.</p> <p>For N8.SA5, the indicative height should be increased to 120m, to reflect the approved heights in the Stratford City Outline Planning Permission (‘SCOPP’) (ref. 07/90023/VARODA granted in February 2005 and most recently amended by application ref. 10/90641/EXTODA).</p>	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”.</p> <p>Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Due to its emerging context, its Metropolitan Centre nature and its capacity for growth, the TBZ19: Stratford Central has been identified as the area of maximum capacity in the Borough, with opportunities for tall elements up to 100m. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p> <p>However, this policy approach has now changed following further analysis undertaken and outlined in the Tall Buildings Annex (2024). Through this analysis it was concluded that the 100 m zone could be extended to include the site in its entirety and create a cluster around Stratford International in line with the spatial hierarchy and objectives of the new local plan.</p> <p>The changes you have proposed in regards to maximum heights permissible in N8.SA5 site allocation have not been made. We did not consider this change to be necessary as, whilst we acknowledge that consents have been granted with tall elements at a greater</p>
-------------	-----------------------	-----------------	--------	-------------------	-----------------------------------	--	------------------------------	--	--	---	--

											<p>height than the heights allowed within the tall building zone designation in the emerging local plan and that the site could still benefit from these consents, these consents were permitted under the adopted LLDC Local Plan.</p> <p>The draft emerging Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p> <p>Please see new wording in TBZ19: Stratford Central and relevant site allocations.</p>
--	--	--	--	--	--	--	--	--	--	--	---

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	As with our comments above, we propose that references to building heights are indicative.						D4 Tall buildings	Design	Reg18-E-130/051	Hadley Property Group	Reg18-E-130
	A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).						D4 Tall buildings	Design	Reg18-E-130/084	Hadley Property Group	Reg18-E-130
	Support noted.				1						

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 tall buildings outside of tall building zones will, in line with Policy D9 of the London Plan, be considered a departure from the Plan. The Master Brewer Case took place in the context of a Local Plan produced before the London Plan 2021. The Newham Local Plan is supported by a detailed evidence base to identify suitable locations for Tall Buildings, in line with London Plan Guidance. We do acknowledge there may be exceptional circumstances where through a detailed townscape and impact assessment a development that complies with Policy D9 part C of the London Plan (2021) but was outside of a Tall Building Zone could be considered acceptable if it was demonstrated that the impact on the townscape was acceptable and if the public benefits delivered would outweigh any potential harm caused to the townscape.				2		D4 Tall buildings	Design	Reg18-E-130/085	Hadley Property Group	Reg18-E-130

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”.</p> <p>Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>						D4 Tall buildings	Design	Reg18-E-130/088	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 following further analysis undertaken and outlined in the Tall Buildings Annex (2024). Through this analysis it was concluded that the 100 m zone could be extended to include the site in its entirety and create a cluster around Stratford International in line with the spatial hierarchy and objectives of the new local plan. More details on the methodology used to identify suitable locations and height for tall buildings can be found in the Tall Building Annex (2024). Please see new wording in TBZ19: Stratford Central and relevant site allocations.						D4 Tall buildings	Design	Reg18-E-130/089	Hadley Property Group	Reg18-E-130
	A change to this policy approach has not been made. We did not consider this change to be necessary as, whilst we acknowledge that consents have been granted with tall elements at a greater height than the heights allowed within the tall building zone designation in the emerging local plan and that the site could still benefit from these consents, these consents were permitted under the adopted LLDC Local Plan. The draft emerging Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context. More details on the methodology used to identify suitable						D4 Tall buildings	Design	Reg18-E-130/091	Hadley Property Group	Reg18-E-130

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	locations for tall buildings can be found in the Tall Building Annex (2024).										
	This policy approach has now changed. A reference to the importance of conserving and enhancing the significance of heritage assets and the reference to the relevant Character Appraisal and Management Plans have been included. The wording of Policy D4 and relevant site allocation design principles have been changed to clarify how development proposals of tall buildings in proximity to sensitive areas should respond to the historic environment and manage the transition between conserve and transform areas. Please see the new wording in Table 1: Tall Building Zones, implementation text D4.3 and relevant site allocations.	We note the tall building zones designated and the definition of a tall building in Newham within this policy. However, we further note the policy as set out does not include any reference to the importance of sustaining and enhancing the significance of heritage assets (para 190b of the NPPF). While we acknowledge policy D10 relating to heritage assets, and indeed the relevant policies in the London Plan, we consider that D4 would establish the principle of tall buildings in certain sensitive areas with potential adverse effects on the historic environment. It should therefore contain an explicit reference to ensuring its conservation.			D4		D4 Tall buildings	Design	Reg18-E-147/006	Historic England	Reg18-E-147

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed. A reference to the importance of conserving and enhancing the significance of heritage assets and the reference to the relevant Character Appraisal and Management Plans have been included. The wording of Policy D4 and relevant site allocation design principles have been changed to clarify how development proposals of tall buildings in proximity to sensitive areas should respond to the historic environment and manage the transition between conserve and transform areas. Please see the new wording in Table 1: Tall Building Zones, implementation text D4.3 and relevant site allocations.	As indicated above, we welcome the emphasis on the characterisation study underpinning the draft Plan, and do not have any comments on the methodology behind this. However, in certain areas (for example the Stratford and Maryland neighbourhood) we note that areas defined through the study as ‘conserve’ and ‘transform’ are adjacent. We consider the relationship between these two, including that element of it likely to be influenced by tall buildings in close proximity, and the resultant transition between two character areas requires further clarity in management than as currently set out.	Evidence Base: Newham Characterisation Study: Maccrae Levington with New Practice, Avison Young and GHPA (2022)				D4 Tall buildings	Design	Reg18-E-147/007	Historic England	Reg18-E-147
	This wording change has been made. Please see the new wording in TBZ3: East Ham.	TBZ3: East Ham. Reference to impacts on the setting of the conservation area being minimised should be removed. This implies that an unspecified degree of harm to a heritage asset would be acceptable – the NPPF is clear that any harm to the significance of a designated heritage asset should require clear and convincing justification.					TBZ3: East Ham	Design	Reg18-E-147/022	Historic England	Reg18-E-147

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Support noted.	Draft Policy D4 – Tall Buildings Draft Policy D4 defines tall buildings as those at or over 21m (roughly seven storeys). We are supportive of this definition which aligns with Policy D9 of the London Plan which states that development plans should define what is considered a tall building based on local context but should not be less than 6 storeys or 18m			1		D4 Tall buildings	Design	Reg18-E-068/035	Hollybrook Homes	Reg18-E-068
	Support noted.	Draft Policy D4 sets out that tall buildings will only be acceptable, subject to detailed design and master planning considerations, in areas marked on the Policies Map as ‘Tall Building Zones’. Guidance is also provided on the maximum height range at each zone. We are supportive of this approach to tall buildings which aligns with Policy D9 of the London Plan which sets out that a plan-led approach should be adopted for tall buildings.			2		D4 Tall buildings	Design	Reg18-E-068/036	Hollybrook Homes	Reg18-E-068
	Comment noted.	Our key concerns are that these consents have not been considered in the setting of Tall Building Zones			TBZ19: Stratford Central		D4 Tall buildings	Design	Reg18-E-105/005	IQL South	Reg18-E-105

Reg18-E-105	IQL South	Reg18-E-105/040	Design	D4 Tall buildings	N8.SA5 Stratford Town Centre West		TBZ19: Stratford Central			<p>IQL South is covered by two existing planning permissions, the Stratford City Outline Planning Permission (SC OPP) (ref: 10/90641/EXTODA) and Plot S10 Outline Planning Permission (ref: 20/00146/OUT).</p> <p>These include parameters across the northern section of IQL South up to 110m AOD under the SC OPP and up to 80m AOD on Plot S10. (See parameter plans in Appendix 1).</p> <p>A further application on Plot S1/S11 received resolution to grant in May 2022 for buildings up to 129m AOD (35-storeys) (ref: 21/00416/FUL)</p> <p>IQL South is concerned that these extant permissions have not being considered in the setting of Tall Building Zones, with the relevant area for Plot S1/S11, S10 and Plots S2 and S23 (under the SC OPP) all covered by the 60m Tall Building Zone designation.</p> <p>This is inconsistent with the extant planning permissions and should be amended, so that IQL South in its entirety is covered by the highest 100m Tall Building Zone</p>	<p>This policy approach has now changed following further analysis undertaken and outlined in the Tall Buildings Annex (2024). Through this analysis it was concluded that the 100m zone could be extended to continue the consolidated clusters around IQL South and Cherry Park which align with the spatial hierarchy and objectives of the new Local Plan. Please see the new wording in TBZ19: Stratford Central and relevant site allocation N8.SA5 Stratford Town Centre West.</p> <p>Whilst we acknowledge that consents have been granted to the remaining plots to be developed in IQL South with tall elements at greater heights than the heights allowed within the tall building zone designation, and that the sites can still benefit from these consents, these consents were permitted under the adopted LLDC Local Plan. The draft emerging Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context.</p> <p>While we have taken into consideration your information our conclusion remains that, in line with the methodology used to identify suitable locations and heights for tall buildings across the borough, the remaining plot S10 and plot S1 are not considered appropriate for greater heights. The maximum permissible heights seek to preserve the spatial hierarchy aspiration for the borough and Stratford Area. More details on the methodology used to identify suitable locations and height for tall buildings can be found in the Tall Building Annex (2024).</p>
-------------	-----------	-----------------	--------	-------------------	-----------------------------------	--	--------------------------	--	--	--	---

Reg18-E-126	IXDS Ltd	Reg18-E-126/054	Design	D4 Tall buildings	N5.SA5 Canning Town Riverside		D4			<p>4 PLACEMAKING</p> <p>Mayer Parry Wharf Characterisation</p> <p>4.1 The evidence base document Newham Characterisation Study (NCS) (2022) prepared by Maccleanor Lavington sets out the assessment undertaken to strategically characterise, evaluate and establish the capacity for change for each part of the borough. The report identifies neighbourhoods within the borough alongside design principles to guide new development. The Mayer Parry Wharf site falls within the '6. Manor Road' neighbourhood and is directly adjacent to the '5. Canning Town and Custom House' neighbourhood.</p> <p>4.2 The 'Manor Road' neighbourhood is identified as being an area of fragmented character that is not sensitive to change and with high opportunity for growth. It is one of the areas able to be 'transformed', meaning to "substantially increase developments by introducing new building types with scope to creating a new street pattern/frontage" and "establish new character following a site specific vision". Accordingly, the Regulation 18 Local Plan, in relation to the draft Manor Road neighbourhood designation (N6), sets out that vision as follows (our emphasis in bold): "Manor Road will be a successful industrial and employment focussed neighbourhood and its riverside character will be enhanced through improved connections to Tower Hamlets via new bridges across the River Lea and through the extension of the Leaway south of Cody Dock. Growth in the neighbourhood will be delivered through</p>	<p>Tall Building Study (2018) has been replaced with the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. Newham Characterisation Study (2023) has been supplemented with a Tall Building Annex (2024). The document summarizes the sieving exercise that has been undertaken to identify locations where tall buildings may be an appropriate form of development and expands on the townscape assessment for each area of the borough. Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>
-------------	----------	-----------------	--------	-------------------	-------------------------------	--	----	--	--	---	---

									<p>the optimisation and intensification of industrial land for modern industrial uses, supported by digital connectivity improvements”.</p> <p>Approach to tall buildings</p> <p>4.3 This analysis is used as a basis for the allocation of Tall Buildings Zones (TBZs), i.e., areas where heights of buildings can exceed 21m. The NCS states that “within these areas the location and suitability of isolated tall elements should be assessed on a case-by-case basis considering their impact on the context and ability to aid legibility of key areas and facilitate wayfinding”. The policies set out in the draft Local Plan reflect the findings of the NCS.</p> <p>4.4 Policy D4 relating to ‘Tall Buildings’ follows the allocation of Tall Building Zones set out in the Newham Characterisation Study (NCS) – see Figure 4. Notwithstanding the discussion below, we note that the policy for tall buildings has drawn principally from the NCS without an up-to-date Tall Buildings Study. Given that the rationale and evidence base underpinning tall buildings policy continues to draw from Newham’s out-of-date Tall Buildings Study (2018), which formed part of the previous Local Plan evidence base, a new comprehensive Tall Buildings Study should be additionally prepared to properly inform the content of Policy D4. It is not clear why this evidence base document was not updated for this Local Plan review.</p>	
--	--	--	--	--	--	--	--	--	---	--

											<p>[Image attached - Figure 4 - Proposed approach to tall building zones in the surrounds of the Mayer Parry Wharf site (indicated by black arrow)]</p>	
--	--	--	--	--	--	--	--	--	--	--	---	--

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted.	4.5 Within the 'Canning Town and Custom House' neighbourhood (which includes the Crown Wharf site) the sites around Canning Town Station are included within the TBZ13: Canning Town (shown with a yellow hatch in the above diagram) with a maximum height range of 40m and 50m and defined areas where the height can range up to 100m. The tallest elements are preferred immediately adjacent to Canning Town station with further tall elements stepping down from this central cluster. Policy D4 suggests that "all tall buildings in this zone must consider the cumulative impact with existing tall buildings to avoid saturating the skyline" and "their impact on conservation areas should be carefully assessed". The 'Manor Road' neighbourhood falls within the TBZ14: Manor Road (shown with a black hatch in the above diagram) with prevailing heights between 9m and 21m with opportunity to include limited tall building elements up to 32m; this is the most restrictive category of draft tall building zone.		TBZ13: Canning Town		N5.SA5 Canning Town Riverside	D4 Tall buildings	Design	Reg18-E-126/056a	IXDS Ltd	Reg18-E-126
	Support noted.	4.6 We welcome Policy D4's recognition that taller buildings could rise above the specified shoulder heights subject to an assessment of their impact...		TBZ13: Canning Town		N5.SA5 Canning Town Riverside	D4 Tall buildings	Design	Reg18-E-126/056b	IXDS Ltd	Reg18-E-126

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 Policy D9 in the London Plan (2021) requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these location. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. Furthermore, in line with Policy D9 part c of the London Plan (2021), Policy D4.3 and implementation text D4.3 are clear that development proposals for tall buildings will only be acceptable if they address visual, functional, environmental and cumulative impact. Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).	[We welcome Policy D4’s recognition that taller buildings could rise above the specified shoulder heights subject to an assessment of their impact.] but, for buildings that are subject to the ‘prevailing heights’ restriction, the current policy wording establishes an approach whereby tall buildings above a specific height are prohibited from being acceptable. We have significant concerns with the soundness of this approach, given that this is more restrictive than the London Plan (Policy D9) approach to considering acceptability of tall buildings, which incorporates an essential test of qualitative assessment at Policy D9(c) alongside its other locational considerations.					D4 Tall buildings	Design	Reg18-E-126/057	IXDS Ltd	Reg18-E-126
	Comment noted.	4.7 Specific heights for the draft site allocation N5.SA5 are suggested in the draft Local Plan as follows: “heights should not exceed 15 storeys, with the					N5.SA5 Canning Town Riverside	Design	Reg18-E-126/058	IXDS Ltd	Reg18-E-126

Comment Response	
Comment	<p>tallest buildings to the south of the site [i.e. at Crown Wharf], stepping down in height to four storeys to the north [i.e. at the Mayer Parry Wharf site] adjacent to Bidder Street. Heights across the rest of the site should be broadly between 6-8 storeys”.</p> <p>Relevant developments within the local area</p> <p>4.8 A planning application for a mixed-use scheme by Barratt Homes within TBZ13 has been submitted to the Council for consideration in respect of the Crown Wharf site, directly south of the Mayer Parry Wharf site, incorporating buildings rising to approximately 100m. The Manor Road development, also within TBZ13, east of the Mayer Parry Wharf site, which is currently under construction has building heights of approximately 110m, considerably higher than the allocated height of up to 50m. Therefore, the actual appropriate height for the sites adjacent to and near the Mayer Parry Wharf site should be considered on a ‘case by case’ basis as set out in the NCS, cognisant of development that has been built and granted planning permission nearby,</p>
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
	Comment noted.	[Therefore, the actual appropriate height for the sites adjacent to and near the Mayer Parry Wharf site should be considered on a 'case by case' basis as set out in the NCS, cognisant of development that has been built and granted planning permission nearby,] but, in any case, 15m as set out within Site Allocation N5.SA5, is too restrictive and unevidenced, as set out below.			TBZ13: Canning Town	N5.SA5 Canning Town Riverside	D4 Tall buildings	Design	Reg18-E-126/059	IXDS Ltd	Reg18-E-126

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed following further analysis undertaken and outlined in the Tall Buildings Annex (2024). Through this analysis it was concluded that the 50m zone could be extended to recognise the suitability of the site for tall building developments and its industrial intensification opportunity in line with Policy J1 and J2 whilst preserving the spatial hierarchy aspiration for the borough and Canning Town area.</p> <p>However, the approach you have suggested has not resulted in a change. We did not consider this change to be appropriate as while we have taken into consideration your information our conclusion remains that, in line with the methodology used to identify suitable locations and heights for tall buildings across the borough, the Mayer Parry Wharf site is not considered appropriate for greater heights.</p> <p>The maximum permissible heights seek to preserve the spatial hierarchy aspiration for the borough and Canning Town area. Please see the new wording in Table 1: Tall Building Zones, TBZ13: Canning Town and N4.SA5 Canning Town Riverside site allocation.</p>					TBZ14: Manor Road			Reg18-E-126/060	IXDS Ltd	Reg18-E-126

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed following further analysis undertaken and outlined in the Tall Buildings Annex (2024). Through this analysis it was concluded that the 50m zone could be extended to recognise the suitability of the site for tall building developments and its industrial intensification opportunity in line with Policy J1 and J2 whilst preserving the spatial hierarchy aspiration for the borough and Canning Town area.</p> <p>However, the approach you have suggested has not resulted in a change. We did not consider this change to be appropriate as while we have taken into consideration your information our conclusion remains that, in line with the methodology used to identify suitable locations and heights for tall buildings across the borough, the Mayer Parry Wharf site is not considered appropriate for greater heights.</p> <p>The maximum permissible heights seek to preserve the spatial hierarchy aspiration for the borough and Canning Town area. Please see the new wording in Table 1: Tall Building Zones, TBZ13: Canning Town and N4.SA5 Canning Town Riverside site allocation.</p>	D4.2		TBZ14: Manor Road		N5.SA5 Canning Town Riverside	D4 Tall buildings	Design	Reg18-E-126/062	IXDS Ltd	Reg18-E-126

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Support noted.	D4.4 4.11 The quality of the design embodied in a development on the Mayer Parry Wharf site is important in determining the acceptability of effects on the townscape. The NPPF requires building designs to aspire to beauty and Historic England acknowledges that a high-quality design can mitigate harm to the setting of heritage assets. Policy D4 of the draft Local Plan also states that a high-quality design is expected for all tall buildings proposed and assessment by Newham's Design Review Panel is required. According to policy D4, the base (shoulder height) of a tall building should respect a 1:1 scale relative to the width of the street, and articulations and set-backs are encouraged to emphasise the relationship with the street context. Where a free-standing tall building is proposed "the first two levels should be designed with greater attention to detail and in a way that directly responds to the character of the street". These are welcome expectations.		TBZ14: Manor Road		N5.SA5 Canning Town Riverside	D4 Tall buildings	Design	Reg18-E-126/063	IXDS Ltd	Reg18-E-126

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference			
	<p>This policy approach has now changed following further analysis undertaken and outlined in the Tall Buildings Annex (2024). Through this analysis it was concluded that the 50m zone could be extended to recognise the suitability of the site for tall building developments and its industrial intensification opportunity in line with Policy J1 and J2 whilst preserving the spatial hierarchy aspiration for the borough and Canning Town area.</p> <p>However, the approach you have suggested has not resulted in a change. We did not consider this change to be appropriate as while we have taken into consideration your information our conclusion remains that, in line with the methodology used to identify suitable locations and heights for tall buildings across the borough, the Mayer Parry Wharf site is not considered appropriate for greater heights.</p> <p>The maximum permissible heights seek to preserve the spatial hierarchy aspiration for the borough and Canning Town area. Please see the new wording in Table 1: Tall Building Zones, TBZ13: Canning Town and N4.SA5 Canning Town Riverside site allocation.</p>	<p>Locational factors</p> <p>4.12 Beyond the character considerations, we note that the Mayer Parry Wharf site and the Crown Wharf site to its south are both within 400m of Canning Town station and associated transport hub. Subject to considerations of character, it would be a missed opportunity to not seek a dense and/or tall form of development on this site given the sustainability of this location.</p>				TBZ14: Manor Road			N5.SA5 Canning Town Riverside	D4 Tall buildings	Design	Reg18-E-126/064	IXDS Ltd	Reg18-E-126

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy D9 in the London Plan (2021) requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”.</p> <p>Furthermore, in line with Policy D9 part c of the London Plan (2021), Policy D4.3 and implementation text D4.3 are clear that development proposals for tall buildings will only be acceptable if they address visual, functional, environmental and cumulative impact.</p> <p>Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>				2		D4 Tall buildings	Design	Reg18-E-126/065	IXDS Ltd	Reg18-E-126

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference	
	<p>This policy approach has now changed following further analysis undertaken and outlined in the Tall Buildings Annex (2024). Through this analysis it was concluded that the 50m zone could be extended to recognise the suitability of the site for tall building developments and its industrial intensification opportunity in line with Policy J1 and J2 whilst preserving the spatial hierarchy aspiration for the borough and Canning Town area.</p> <p>However, the approach you have suggested has not resulted in a change. We did not consider this change to be appropriate as while we have taken into consideration your information our conclusion remains that, in line with the methodology used to identify suitable locations and heights for tall buildings across the borough, the Mayer Parry Wharf site is not considered appropriate for greater heights.</p> <p>The maximum permissible heights seek to preserve the spatial hierarchy aspiration for the borough and Canning Town area. Please see the new wording in Table 1: Tall Building Zones, TBZ13: Canning Town and N4.SA5 Canning Town Riverside site allocation.</p>					TBZ14: Manor Road		D4 Tall buildings	Design	Reg18-E-126/066	IXDS Ltd	Reg18-E-126

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted.	4.15 Taller elements within the TBZ14 Manor Road would allow a transition between the currently established heights and the aspiration for the neighbourhood to the north. The right height for the Mayer Parry Wharf site is not a definitive matter but one of judgement and it can be concluded that a proposed height of approximately 80m is not just acceptable, but also desirable when it is considered from all directions, to facilitate a transition. A well-designed development of this height would optimise the development potential of the Mayer Parry Wharf site whilst making the most efficient use of a brownfield site as well as protecting the significance of the surrounding townscape and nearby heritage assets.		TBZ14: Manor Road		N5.SA5 Canning Town Riverside	D4 Tall buildings	Design	Reg18-E-126/067	IXDS Ltd	Reg18-E-126

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted.	4.16 Consistent with the findings of the townscape and visual impact assessment undertaken by Citydesigner, we note that the outcome of developer led consultation on the proposed development for the EMR site led to confirmation that local people supported a building of the scale proposed at pre-application stage.			TBZ14: Manor Road	N5.SA5 Canning Town Riverside	D4 Tall buildings	Design	Reg18-E-126/069	IXDS Ltd	Reg18-E-126

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>Tall Building Study (2018) has been replaced with the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. Newham Characterisation Study (2023) has been supplemented with a Tall Building Annex (2024). The document summarizes the sieving exercise that has been undertaken to identify locations where tall buildings may be an appropriate form of development and expands on the townscape assessment for each area of the borough.</p> <p>Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets.</p> <p>More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>				D4		D4 Tall buildings	Design	Reg18-E-126/070	IXDS Ltd	Reg18-E-126

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy D9 in the London Plan (2021) requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”.</p> <p>Furthermore, in line with Policy D9 part c of the London Plan (2021), Policy D4.3 and implementation text D4.3 are clear that development proposals for tall buildings will only be acceptable if they address visual, functional, environmental and cumulative impact.</p> <p>Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>				D4		D4 Tall buildings	Design	Reg18-E-126/071	IXDS Ltd	Reg18-E-126

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed following further analysis undertaken and outlined in the Tall Buildings Annex (2024). Through this analysis it was concluded that the southern part of the N4.SA5 Canning Town Riverside site allocation could accommodate greater heights up to 60m whilst preserving the spatial hierarchy aspiration for the borough and Canning Town area.</p> <p>Please see the new wording in Table 1: Tall Building Zones, TBZ13: Canning Town and relevant site allocations, including N4.SA5 Canning Town Riverside.</p> <p>However, the change you have suggested has not resulted in a change as we did not consider this change to be appropriate as, based on the methodology used to identify suitable locations and heights for tall buildings, N4.SA5 Canning Town Riverside is not considered appropriate for a 100m Tall Building Zone designation. The maximum permissible heights seek to preserve the spatial hierarchy aspiration for the borough and Canning Town area.</p> <p>More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>					TBZ14: Manor Road				IXDS Ltd	Reg18-E-126
	<p>[Recommendations to a revision to the draft policies</p> <p>4.17 Given the above, our recommendations for changes to the draft Local Plan are as follows:]</p> <p>The approach to tall buildings within site allocations should be made consistent with the approach set out in Policy D4. Draft site allocation N5.SA5 should remove the reference to 15m and support a height truly appropriate for the site as established by townscape assessment and an updated Tall Buildings Study, which would establish a height to accommodate buildings up to 100m.Tall Building Zone 14 (TBZ14) which supports draft Policy D4 should also reflect this approach.</p>					N5.SA5 Canning Town Riverside	D4 Tall buildings	Design	Reg18-E-126/073		Reg18-E-126

Reg18-K-012	IXO (New River Place) LLP	Reg18-K-012/009	Design	D4 Tall buildings			TBZ13: Canning Town		<p>Policy D4 (Tall buildings) notes that “Tall buildings will only be acceptable, subject to detailed design and masterplanning considerations, in areas marked on the Policies Map as ‘Tall Building Zones’. The height of tall buildings in any ‘Tall Buildings Zone’ should not exceed the respective limits set in Table 1” of the draft Local Plan.</p> <p>The Newham Characterisation Study Chapter 8: 5 Canning Town and Custom House (p199) states in the Transform Areas (where the site is located) that ‘additional taller elements up to 50m and in some places 60m, could be integrated into future development...these elements should be positioned carefully to aid wayfinding and mark special locations’.</p> <p>Given the potential introduction of the new east-west route through the Site (wayfinding) and the significant uses on the site (both historically and present) we consider that the Site should be considered a ‘special location’ with clear marking of the long-term community uses on the site making a positive contribution to the townscape, as well as the heritage of the area.</p> <p>We consider Policy D4 to be unduly restrictive and not in general conformity with the more recent interpretation of London Plan Policy D9 (Tall Buildings) established from the Master Brewer (2021) judgment of the High Court ([2021] EWHC 3387 (Admin)). The High Court decision establishes that Policy D9 should be interpreted with flexibility and</p>	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate for the following reasons. Although tall buildings up to 50m are supported on the site and Policy SP4 of the adopted Local Plan allows a degree of flexibility in exceeding permissible heights, the new plan is setting a new policy direction, as informed by London Plan Policy D9 which requires boroughs to identify locations where tall buildings may be an appropriate form of development. In addition, Policy D9 part B (3) clearly states “Tall buildings should only be developed in locations that are identified as suitable in Development Plans.” Due to its sensitive location in proximity to a Grade II listed building, the site is not considered a ‘special location’ which should be marked with greater heights than the maximum permissible heights on the site. Furthermore, in line with Policy D9 of the London Plan, tall buildings outside of tall building zones will, be considered a departure from the Plan. The Master Brewer Case took place in the context of a Local Plan produced before the London Plan 2021. The Newham Local Plan is supported by a detailed evidence base to identify suitable locations for Tall Buildings, in line with London Plan Guidance. We do acknowledge there may be exceptional circumstances where through a detailed townscape and impact assessment a development that complies with Policy D9 part C of the London Plan (2021) but was outside of a Tall Building Zone could be considered acceptable if it was demonstrated that the impact on the townscape was acceptable and if the public</p>
-------------	---------------------------	-----------------	--------	-------------------	--	--	---------------------	--	---	---

									<p>sites outside of the designated locations for tall buildings as per Policy D9 should not automatically be considered inappropriate, with considerations given to potential impacts as per Part C of Policy D9. For these reasons, we consider the proposed blanket height restriction for buildings outside of identified Tall Buildings Zone will be inconsistent with the London Plan and irrespective of a design-led process and the wider regeneration benefits (such as sustainable community offerings and housing delivery).</p> <p>The existing Policy SP4 allows the exceedance of height ranges where added value can be demonstrated. We consider such flexibility should be retained to allow for other matters such as potential add value, viability, and the emerging clusters of tall buildings already achieved through Policy SP4 and envisioned in the draft Policy D4.</p> <p>For the reasons set out above, we recommend the draft Policy D4 be updated to flexibly reflect the outcome of the Master Brewer case.</p>	benefits delivered would outweigh any potential harm caused to the townscape.
--	--	--	--	--	--	--	--	--	---	---

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	The Tall Building Zones have always been included in the policies map, an interactive zoomable version of which is available online. Due to the detail included on the zones, this remains the clearest place for interested stakeholders to view the areas subject to policy D4.	Policy D4 sets out Newham's Tall Building policy. [...] Whilst the Table 1: Tall Buildings Zones is very clear on the areas and site allocations included in the Tall Buildings Zone, the associated map (Pg 64 of the Local Plan) is not. This is particularly an issue around Stratford / Pudding Mill Lane where varying tall building heights are proposed. These areas would benefit from a detailed map, to help clearly identify the acceptable heights.		D4 mapping			D4 Tall buildings	Design	Reg18-E-096/008	L&Q	Reg18-E-096

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Support noted.	<p>Draft policy D4 states that tall buildings (those exceeding 21m) will only be acceptable subject to detailed design and masterplanning considerations, in areas marked on the Policies Map as 'Tall Building Zones'. The height of tall buildings in any 'Tall Buildings Zone' should not exceed the respective limits set in Table 1 on p.58 of the draft local plan.</p> <p>Table 1 identifies TBZ4: Beckton, which incorporates the northern half of Beckton district centre and all of Beckton Retail Park. Within TBZ4 there are two sub-zones:</p> <ol style="list-style-type: none"> 1. Opportunity to include limited tall building elements up to 32m to mark the centre of the Town Centre. 2. Opportunity to include limited tall building elements up to 40m to mark Beckton DLR Station. <p>We are supportive of the inclusion of the TBZ4 allocation within the draft local plan and agree that the site is suitable for buildings taller than the prevailing height of between 9m and 21m. We also support the requirement for development to be mindful of height transitions while delivering higher densities.</p>		TBZ4: Beckton			D4 Tall buildings	Design	Reg18-E-109/011	LAMIT c/ CCLA Investment Management Ltd	Reg18-E-109

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-109	LAMIT c/ CCLA Investment Management Ltd	Reg18-E-109/013	Design	D4 Tall buildings			TBZ4: Bectkton			[See proposed plan in submission] We note that draft policy D4 includes a taller sub-allocation cluster of up to 40m directly to the south of the roundabout, reflecting the previous design work indicating that this would be a suitable location for taller buildings. We therefore request that the 40m allocation is extended to include the southwestern corner of Beckton Retail Park. An indicative plan is appended to this letter showing how the 40m allocation could be extended.	This change has been made. Please see the new map in Policy D4.
Reg18-E-109	LAMIT c/ CCLA Investment Management Ltd	Reg18-E-109/014	Design	D4 Tall buildings			TBZ4: Bectkton			We also suggest that the Council is more ambitious in regard to the maximum height allocation and believe that the 40m sub-allocation extended to include the south-eastern corner of Beckton Retail Park could be increased to 55m – 60m. This area has already been identified as appropriate for taller buildings and the additional height would help contribute to the identified shortfall in housing provision and be an appropriate clustering of taller buildings in response to the broader N11.SA1 East Beckton Town Centre allocation.	A change to this policy approach has not been made. We did not consider this change to be appropriate as, based on the sieving exercise undertaken to identify suitable locations for tall buildings across the borough and, due to its sensitive location in close proximity to a wider low rise context and an area of a townscape value, TBZ4: Beckton is not considered a suitable location to accommodate greater heights. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).
Reg18-E-109	LAMIT c/ CCLA Investment Management Ltd	Reg18-E-109/015	Design	D4 Tall buildings			TBZ4: Bectkton			In summary, we are proposing the following change to draft policy D4: TBZ4: 1. Amend the policy map to extend the 40m zone of TBZ4 to include the south-western corner of Beckton Retail Park, as indicated on the illustrative plan	This change has been made. Please see the new map in Policy D4.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		submitted in support of these representations.									
	Support noted.	<u>Design</u> Section D of the draft Local Plan relates to design. Policy D4 sets out the Council's objective with regards to tall buildings (defined as those at or over 21m, roughly seven storeys). Landhold is supportive of Policy D4 in principle.		D4			D4 Tall buildings	Design	Reg18-E-056/011	Landhold Developments Ltd	Reg18-E-056

Reg18-E-056	Landhold Developments Ltd	Reg18-E-056/012	Design	D4 Tall buildings	New site		TBZ17: Plaistow Station		<p>However, it strongly considers that the Site should be included within a tall building zone as defined under policy D4.</p> <p>As noted above the Newham Characterisation Study (2022), offers guidance on where and how future growth could be delivered in the borough. Following a baseline analysis of Newham, Chapter 7 has devised areas of the borough that are to be conserved, enhanced or transformed, and also provides a tall building zone strategy map. It is noted that the suggested tall building zones broadly correspond with 'transform' areas. However, Landhold considers this a missed opportunity for areas that have the potential to be 'enhanced', particularly in highly sustainable locations adjacent to 'transform' areas, near to existing or emerging centres and defined as having a 'low sensitivity to change' such as the Site.</p> <p>Tall Building Zone (TBZ) 17: Plaistow is located partially within an existing Local Centre (Plaistow North Local Centre) and includes draft site allocation N9.SA1 Plaistow North (a revised boundary of site allocation S29 in Newham Local Plan (2018)). Landhold considers TBZ17 should be extended to include the Site given its proximity to Plaistow station, nearby tall buildings and Plaistow North's Primary Shopping Frontage (PSF), directly opposite part of the Site. Building heights immediately surrounding the Site already reach 6 storeys. The Newham Characterisation study specifically states that the transformation area suggested</p>	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as, based on the sieving exercise to identify tall building locations and maximum heights, the Site is not considered an appropriate location to accommodate greater height. The proposed maximum permissible heights seek to preserve the spatial hierarchy aspiration of the plan and the Site is considered appropriate for a gradual transition to the low rise context. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>
-------------	---------------------------	-----------------	--------	-------------------	----------	--	-------------------------	--	--	--

									<p>could contribute to a new centre around the station, capitalising on the access to public transport. We agree with this and strongly consider that the Site falls within this definition given its location.</p> <p>Given the site constraints in relation to other building footprints, the need to optimise employment on the Site and the need to maximise affordable housing, the optimal solution would be to build higher than the prevailing height to ensure the Site is fully optimised. Under draft policy D4 this would be considered a tall building (i.e. exceeding 7 storeys). The approach to optimising the site through additional height would accord with draft policy BFN1 part 2 which seeks to make the best use of land by applying a design led approach, draft policy H1 and draft policy D3 which seek to optimise sites. Paragraph 119 of the NPPF states that policies should set “out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land” and policy D3 of the London Plan (2021) supports the optimisation of a site’s capacity for an appropriate land use and Policy GG4 of the London Plan also seeks to “ensure more homes are delivered”. It would, therefore, be prudent to include a larger tall building zone around Plaistow Station through an extension to TBZ17 to ensure that brownfield sites around the station are able to be fully optimised to take advantage of the existing public transport network. We have provided a plan illustrating the suggested extension</p>	
--	--	--	--	--	--	--	--	--	--	--

										to TBZ17 boundary in Annex 1. [See Annex 1: Revised TBZ17 Boundary].	
--	--	--	--	--	--	--	--	--	--	--	--

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”.</p> <p>Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>				2		D4 Tall buildings	Design	Reg18-E-056/014	Landhold Developments Ltd	Reg18-E-056

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>Newham Characterisation Study (2023) has been supplemented with a Tall Building Annex (2024). The document summarizes the sieving exercise that has been undertaken to identify locations where tall buildings may be an appropriate form of development and expands on the townscape assessment for each area of the borough. Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p> <p>However TBZ17: Plaistow Station maximum heights have been rationalised to reflect emerging context and adjacent low rise context. Please see new wording in Table 1: Tall Building Zone, TBZ17: Plaistow Station and N9.SA1 Plaistow North site allocation.</p>						D4 Tall buildings	Design	Reg18-E-056/015	Landhold Developments Ltd	Reg18-E-056

Reg18-E-056	Landhold Developments Ltd	Reg18-E-056/016	Design	D4 Tall buildings			D4		<p>D4.2</p> <p>Given the strong policy support for optimising the capacity of sites through the design process, Landhold strongly urges that LBN reconsiders the wording of Policy D4 to provide greater flexibility, as adopted elsewhere in other London boroughs' local plans. For example, Policy BD2 (Tall Buildings) in Brent's Local Plan provides greater flexibility for building heights within TBZs subject to design details. The supporting text to this policy advises that the heights identified for the TBZs:</p> <p>"indicate the heights likely to be generally acceptable to the council. This does not mean that all buildings up to these heights are automatically acceptable. Proposals will still need to be assessed in the context of other policies to ensure that they are appropriate in that location. There might however also be circumstances where the quality of design of a development and its impact on character is such that taller buildings in these locations could be shown by applicants to be acceptable." (p. 418)</p> <p>It is surely appropriate for Local Plans to provide such flexibility given that many of the criteria on which the acceptability of a tall building is assessed cannot be satisfactorily considered at the plan making stage and can only be properly assessed at the planning application stage. For example, Newham's prescriptive approach to the location of tall buildings and their heights does not appear to be supported by sufficiently detailed assessments of townscape, visual amenity or daylight and sunlight,</p>	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these location. Supporting text of Policy D9 part B (2) clearly states "in these locations, determine the maximum height that could be acceptable". Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>
-------------	---------------------------	-----------------	--------	-------------------	--	--	----	--	--	---

									<p>and there is clearly no consideration of design quality at this stage. All of these considerations critically inform the appropriate height, scale and appearance of tall buildings. The Local Plan must not be so prescriptive and inflexible as to unduly restrict otherwise appropriate taller buildings which are demonstrably acceptable in terms of townscape, visual amenity, residential amenity etc. and can make meaningful contributions to housing delivery and wider land use objectives. We would urge Newham to follow the approach of other London boroughs and promote a more balanced and flexible approach to tall buildings.</p> <p>For these reasons, Landhold considers that LBN should adopt a more flexible approach to building heights within TBZs to ensure that development can respond to the surrounding context, especially in locations undergoing considerable redevelopment. Development proposals within TBZs should be assessed on a site-by-site basis, giving particular regard to design considerations. This will ensure optimisation of a site's capacity and consequently allow provision of more affordable housing units, while providing townscape improvements.</p>	
--	--	--	--	--	--	--	--	--	--	--

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, based on the sieving exercise to identify tall building locations and maximum heights, the Site is not considered appropriate to accommodate greater height. The proposed maximum permissible heights seek to preserve the spatial hierarchy aspiration of the plan and the Site is considered appropriate for a gradual transition to a low rise context. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).						D4 Tall buildings	Design	Reg18-E-056/021	Landhold Developments Ltd	Reg18-E-056
	Support noted.						D4 Tall buildings	Design	Reg18-E-097/015	Lee Valley Regional Park Authority	Reg18-E-097

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need.</p> <p>Tall buildings locations identified in Policy D4 are therefore key to delivering much needed homes.</p> <p>Whilst we recognise that in the past years high rise buildings and single tenure development could have had an impact on antisocial behaviour and safety, these issues will be addressed through a range of policies in the Local Plan including co-design masterplanning, homes and design policies. Furthermore, Policy D4.3 and D4.4 and supporting text D4.3 and D4.4 have been expanded to ensure that proposals for tall building developments will be of good quality design and materiality, will respond to local context and will be better integrated with the surrounding.</p>				D4		D4 Tall buildings	Design	Reg18-D-001/003	Local Plan Drop-In	Reg18-D-001

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need.</p> <p>Based on the sieving exercise undertaken to identify suitable locations for tall buildings across the borough and, due to its proximity to a Metropolitan Centre designation, in a transform area with a high level of accessibility, the TBZ18: Stratford High Street Tall Building Zone is considered suitable to accommodate tall building developments. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p> <p>However, Policy D4.3 and D4.4 and supporting text D4.3 and D4.4 have been expanded to ensure that proposals for tall building developments will be of good quality design and materiality, will respond to local context and will be better integrated with the surrounding.</p>	Too many poor quality tall buildings on Stratford High Street			TBZ18: Stratford High Street		D4 Tall buildings	Design	Reg18-D-001/053	Local Plan Drop-In	Reg18-D-001

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as there are oversupply of office floorspace in the borough especially in the LLDC area as demonstrated in the Employment Land Review. Office development should follow town centre first policy approach with flexibility for office proposals outside town centres subject to requirements as set out in Local Plan Policy J2.</p> <p>Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Tall buildings locations identified in Policy D4 are therefore key to delivering much needed homes. Policy D4 together with other design policies will ensure that tall buildings will be of good quality design and materiality, will respond to local context and will be better integrated with the surrounding.</p>				D4		D4 Tall buildings	Design	Reg18-D-001/087	Local Plan Drop-In	Reg18-D-001

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. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Based on the sieving exercise undertaken to identify suitable locations for tall buildings across the borough and, due to its proximity to a Metropolitan Centre designation, in a transform area with a high level of accessibility, the TBZ18: Stratford High Street Tall Building Zone is considered suitable to accommodate tall building developments. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).						D4 Tall buildings	Design	Reg18-D-001/172	Local Plan Drop-In	Reg18-D-001
	Support noted.	D4.3 Policy D4: Tall Buildings We welcome the detailed consideration of the microclimate considerations associated with tall buildings considered in policy D4.3 and would recommend this be retained in full in the final draft of the Local Plan.					D4 Tall buildings	Design	Reg18-E-084/008	London Historic Parks and Gardens Trust	Reg18-E-084

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-084	London Historic Parks and Gardens Trust	Reg18-E-084/009	Design	D4 Tall buildings			D4		D4.3	Please consider expanding the section on microclimate considerations to specifically address the impact of Tall Buildings on existing open spaces, noting that development proposals for taller buildings ' must demonstrate consideration of the impact on public open space. Impacts may include views in and out of open spaces, the provision of natural light and overshadowing – which can be hugely detrimental to the amenity value and horticultural productivity of green open spaces '. Please consider expanding the section on microclimate considerations to specifically address the impact of Tall Buildings on existing open spaces, noting that development proposals for taller buildings ' must demonstrate consideration of the impact on public open space. Impacts may include views in and out of open spaces, the provision of natural light and overshadowing – which can be hugely detrimental to the amenity value and horticultural productivity of green open spaces '.	This policy approach has now changed. Implementation text D4.3 has expanded the environmental impact considerations to ensure the impact of tall buildings on watercourse and open space are considered in line with policies GWS2 and GWS3, which require development proposals for tall buildings to demonstrate consideration of the impact on biodiversity and existing and proposed public open space, including watercourses. Please see the new wording in policy D4.3 and implementation text D4.3.
Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/025	Design	D4 Tall buildings			D4			Policy D4 Tall Buildings the overall policy is considered to be well evidenced and justified,	Support noted.
Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/026	Design	D4 Tall buildings	N8.SA9 Pudding Mill		TBZ18: Stratford High Street			Policy D4 Tall Buildings there are some specific issues relating to consistency between the policy and specific site allocations (in particular for N8 SA9 Pudding Mill).	Comment noted.
Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/027	Design	D4 Tall buildings	N8.SA2 Stratford Station		TBZ19: Stratford Central			Policy D4 Tall Buildings there are some specific issues relating to consistency between the policy and specific site allocations (in particular for N8 SA2 Stratford Station)	Comment noted.
Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/028	Design	D4 Tall buildings			Table 1: Tall Building Zones			Policy D4 Tall Buildings In some instances the zones and the maximum heights for these are not consistent with the currently consented outline or detailed development schemes and so some	Comment noted.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		zones and heights may need to be revisited.									
	A change to this policy approach has not been made. We did not consider this change to be necessary because the Tall Building Zone designations are referenced in the Neighbourhood Policy where necessary and the maximum height - expressed in meters – in each site allocations aligns with Policy D4.	Policy D4 Tall Buildings It may also be helpful to use the site allocations policies to identify where and when exceptions might be acceptable and to acknowledge in these where extant planning permissions have established a height above the maximum level indicated.					D4 Tall buildings	Design	Reg18-E-052/029	London Legacy Development Corporation	Reg18-E-052
	A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and clearly states that “Tall buildings should only be developed in locations that are identified as suitable in Development Plans.” Tall buildings outside of tall building zones will, in line with Policy D9 of the London Plan, be considered a departure from the Plan. We do acknowledge there may be exceptional circumstances where through a detailed townscape and impact assessment a development that complies with Policy D9 part C of the London Plan (2021) but was outside of a Tall Building Zone could be considered acceptable if it was demonstrated that the impact on the townscape was acceptable and if the public benefits delivered would outweigh any potential harm caused to the townscape.	Policy D4 Tall Buildings Furthermore, it is suggested that flexibility is given within the policy to allow for sites adjacent to tall building zones to come forward at a height that does not cause a significant impact on landscape and visual impact as well as local amenity.					D4 Tall buildings	Design	Reg18-E-052/030	London Legacy Development Corporation	Reg18-E-052

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
							D4			London Legacy Development Corporation	Reg18-E-052
	Support noted.	While welcoming the overall approach in the policy,					D4 Tall buildings	Design	Reg18-E-052/079		
	Comment noted. A review of permitted heights was part of the methodology to establish the maximum heights. However, the new plan is setting a new policy direction, as informed by London Plan Policy D9. Whilst we acknowledge that consents have been granted to sites at a greater heights than the maximum permissible height, and that those sites can still benefit from existing consents, the maximum permissible heights seek to preserve the spatial hierarchy aspiration of the plan and the gradual transition to the surrounding context. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).	D4.2 it is considered there are some significant issues with the current draft and its relationship to the mapped Tall Building Zones. In particular, the position that new tall buildings should be lower than the height of existing buildings does not work well for many parts of Stratford, where there are extant planning permissions which allow for construction of tall buildings beyond the height restrictions identified.					D4 Tall buildings	Design	Reg18-E-052/080	London Legacy Development Corporation	Reg18-E-052

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development. Furthermore, Policy D9 part B requires boroughs to define the maximum heights that could be acceptable in these location. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”.</p> <p>Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Due to its emerging context, its Metropolitan Centre nature and its capacity for growth, the TBZ19: Stratford Central has been identified as the area of maximum capacity in the Borough, with opportunities for tall elements up to 100m. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>	<p>[it is considered there are some significant issues with the current draft and its relationship to the mapped Tall Building Zones.]</p> <p>Limiting the tallest elements of buildings within parts of the Metropolitan Centre to 100m (c30 storeys) is also considered arbitrary and so it is suggested that an element of flexibility is added to the policy that allows for greater height where there will be significant benefit to the townscape and where exceptionally good architecture and public realm and other benefits can be demonstrated and have been tested positively through design review.</p>			Table 1: Tall Building Zones		D4 Tall buildings	Design	Reg18-E-052/082	London Legacy Development Corporation	Reg18-E-052

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, based on the sieving exercise to identify tall building locations and maximum heights, N8.SA2 Stratford Station is not considered suitable to accommodate greater heights than the heights permissible in the TBZ19: Stratford Central. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).			TBZ19: Stratford Central		N8.SA2 Stratford Station	D4 Tall buildings	Design	Reg18-E-052/083	London Legacy Development Corporation	Reg18-E-052
	Comment noted.			TBZ18: Stratford High Street		N8.SA9 Pudding Mill	D4 Tall buildings	Design	Reg18-E-052/084	London Legacy Development Corporation	Reg18-E-052
	Comment noted.			TBZ18: Stratford High Street		N8.SA8 Bridgewater Road	D4 Tall buildings	Design	Reg18-E-052/085	London Legacy Development Corporation	Reg18-E-052
	Comment noted.			TBZ18: Stratford High Street		N8.SA7 Rick Roberts Way	D4 Tall buildings	Design	Reg18-E-052/086	London Legacy Development Corporation	Reg18-E-052

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		the event that amendments are sought in order to achieve detailed deliverable schemes without this element of flexibility.									
	This policy approach has now changed following further analysis undertaken and outlined in the Tall Buildings Annex (2024). Through this analysis it was concluded that the 100 m zone could be extended to continue the consolidated cluster around Cherry Park which aligns with the spatial hierarchy and objectives of the new local plan. Please see new wording in Table 1: Tall Building Zones relevant and site allocations. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).	It is suggested that the Tall Building Zones map takes into account existing areas of height e.g. Cherry Park which is within a 60m zone but has buildings under construction that exceed this (30+storeys =+100m)			Table 1: Tall Building Zones		D4 Tall buildings	Design	Reg18-E-052/087	London Legacy Development Corporation	Reg18-E-052

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed following further analysis undertaken and outlined in the Tall Buildings Annex (2024). Through this analysis it was concluded that the 100 m zone could be extended to continue the consolidated cluster around the consented scheme Stratford Assembly which aligns with the spatial hierarchy and objectives of the new local plan. Please see new wording in Table 1: Tall Building Zones relevant and site allocations.</p> <p>A review of permitted heights was part of the methodology to establish the maximum heights. However, the new plan is setting a new policy direction, as informed by London Plan Policy D9. Whilst we acknowledge that consents have been granted to sites at a greater heights of the maximum permissible heights, and that those sites can still benefit from existing consents, the draft emerging Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough wide spatial hierarchy, avoid the scattered composition of tall buildings developed in the past years around Stratford and create a gradual and sensitive transition to the surrounding context. More details on the methodology used to identify suitable locations for tall buildings can be found on the Tall Building Annex (2024).</p>				Table 1: Tall Building Zones		D4 Tall buildings	Design	Reg18-E-052/088	London Legacy Development Corporation	Reg18-E-052

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has not been changed. We did not considered this change to be appropriate as a review of permitted heights was part of the methodology to establish the maximum heights and the new plan is setting a new policy direction, as informed by London Plan Policy D9. Whilst we acknowledge that consents have been granted to sites at a greater height of the maximum permissible height, and that those sites can still benefit from existing consents, the maximum permissible height seek to preserve the spatial hierarchy aspiration of the plan.</p> <p>More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p> <p>Please see new wording in Policy D4 and relevant Tall Building Zones and site allocations.</p>	It is suggested that the Tall Building Zones map takes into account consented heights e.g. Stratford Yards.			Table 1: Tall Building Zones		D4 Tall buildings	Design	Reg18-E-052/089	London Legacy Development Corporation	Reg18-E-052

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. A review of permitted heights was part of the methodology to establish the maximum heights. However, the new plan is setting a new policy direction, as informed by London Plan Policy D9. Whilst we acknowledge that consents have been granted to sites at a greater heights of the maximum permissible heights, and that those sites can still benefit from existing consents, the maximum permissible heights seek to preserve the spatial hierarchy aspiration of the plan and the gradual transition to the surrounding context. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).	It is suggested that broader tall buildings zone be identified for Stratford Metropolitan Centre area encompassing Westfield, East Bank, Carpenters Triangle , the edge of Carpenters Estate and the Stratford Centre would be a more appropriate and readable approach, allowing heights of up to 100m with some taller elements where justified. This would help to recognise that there are a number of completed, permitted and emerging proposals for this area, where the current narrower mapping does not.			Table 1: Tall Building Zones		D4 Tall buildings	Design	Reg18-E-052/090	London Legacy Development Corporation	Reg18-E-052

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 Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and clearly states that “Tall buildings should only be developed in locations that are identified as suitable in Development Plans.” However, Policy D4.4 and implementation text D4.4 have been expanded to clarify how tall buildings should integrate with the context through adequate scale transition from taller elements to low rise context, supporting a comfortable sense of enclosure at street level and a high quality street environment and responding to the character of the street. Site allocations provide additional design guidance to clarify how development proposals of tall buildings in proximity to sensitive areas could respond to the historic environment and manage the transition between conserve and transform areas. Please see the new wording in policy D4.4 and implementation text D4.4.	D4.4		D4			D4 Tall buildings	Design	Reg18-E-052/091	London Legacy Development Corporation	Reg18-E-052
	Comment noted. The Tall Building Zones have always been included in the policies map, an interactive zoomable version of which is available online. Due to the detail included on the zones, this remains the clearest place for interested stakeholders to view the areas subject to policy D4.			D4 Mapping			D4 Tall buildings	Design	Reg18-E-052/092	London Legacy Development Corporation	Reg18-E-052

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference	
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as, based on the sieving exercise undertaken to identify suitable locations for tall buildings across the borough and, due to its location in proximity to a low rise context and outside of a town centre designation, the site is not considered suitable to accommodate tall buildings development.</p> <p>More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p> <p>Furthermore, its Local Mixed Use Area designation for employment-led mixed use seeks to protect existing light industrial and community uses as well as its function as buffer between the Butchers Road LIL and residential and green space.</p>	<p>The Council could therefore identify the site [199-203 Freemasons Road, Canning Town E16 3PY] as a tall building location as per the nearby development.</p>			TBZ13: Canning Town		New site	D4 Tall buildings	Design	Reg18-E-112/031	Millenium Group	Reg18-E-112

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy has been misinterpreted. Bow Goods Yard is designated within TBZ18: Stratford High Street. However, following further analysis undertaken and outlined in the Tall Buildings Annex (2024), a change to this policy approach has been made. TBZ18: Stratford High Street has been extended to include the area of the Bow Goods Yard identified in the Characterisation Study as an enhance area and to recognise the intensification opportunity of the site in its entirety. More details on the methodology used to identify suitable locations and height for tall buildings can be found in the Tall Building Annex (2024).	As outlined in draft Policy D4 (Tall Buildings), tall buildings are defined as those at or over 21m. This policy stipulates that tall buildings will only be acceptable, subject to detailed design and masterplanning considerations, in areas identified as 'Tall Building Zones'. Bow Goods Yard is not proposed to be designated within a Tall Building Zone. The prevailing height is identified as above 21m but below 32m (7-10 storeys). Whilst these heights are generally supported, it is considered that individual schemes that propose increased heights outside of tall building zones should also be considered, particularly where high quality design is demonstrated. It could be appropriate for tall building development to come forward at Bow Goods Yard in isolated areas, particularly to the east in close proximity to the Stratford Tall Building Zone.			Table 1: Tall Building Zones		D4 Tall buildings	Design	Reg18-E-019/006	Network Rail - Bow Goods Yard	Reg18-E-019

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 tall buildings outside of tall building zones will, in line with Policy D9 of the London Plan, be considered a departure from the Plan. The Master Brewer Case took place in the context of a Local Plan produced before the London Plan 2021. The Newham Local Plan is supported by a detailed evidence base to identify suitable locations for Tall Buildings, in line with London Plan Guidance. We do acknowledge there may be exceptional circumstances where through a detailed townscape and impact assessment a development that complies with Policy D9 part C of the London Plan (2021) but was outside of a Tall Building Zone could be considered acceptable if it was demonstrated that the impact on the townscape was acceptable and if the public benefits delivered would outweigh any potential harm caused to the townscape.	D3.3		1			D4 Tall buildings	Design	Reg18-E-073/013	Notting Hill Genesis	Reg18-E-073

Comment Response	
Comment	addition to the Government's rhetoric to promote and prioritise brownfield over greenfield land (as currently set out within the ongoing NPPF consultation) demonstrate the need for a more flexible approach.
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
	<p>A change to this policy approach has not be made. We did not consider this change to be appropriate as tall buildings outside of tall building zones will, in line with Policy D9 of the London Plan, be considered a departure from the Plan. The Master Brewer Case took place in the context of a Local Plan produced before the London Plan 2021. The Newham Local Plan is supported by a detailed evidence base to identify suitable locations for Tall Buildings, in line with London Plan Guidance. We do acknowledge there may be exceptional circumstances where through a detailed townscape and impact assessment a development that complies with Policy D9 part C of the London Plan (2021) but was outside of a Tall Building Zone could be considered acceptable if it was demonstrated that the impact on the townscape was acceptable and if the public benefits delivered would outweigh any potential harm caused to the townscape.</p>	<p>[Appendix D] D4 Tall Buildings Page 58 Proposed Suggested Amendments: [unclear] Tall buildings in Newham are defined as those at or over 21 metres (roughly seven storeys), measured from the ground to the principal top of the building (usually a parapet). Outside of Tall Building Zones, in enhance and conserve areas, the height of new developments should not be above 21m and should be guided by the sensitivity of the character (to conserve or enhance character), and the prevailing height of the context</p> <p>Reason / Comment We consider Policy D4 to be restrictive and inflexible, and would have the effect of unnecessarily constraining development on sites outside of these zones. As such, draft Policy D4 would not be effective in its delivery of sustainable new homes. Given the prescriptive nature of draft Policy D4, it could be held that it is not consistent with the London Plan Policy D3 (Optimising Site Capacity Through the Design-Led Approach) which seeks to optimise the use of land through a design-led approach with regard to context, character and connectivity. We would highlight that the recent High Court caselaw (see London Borough of Hillingdon, v Mayor of London) has brought to light that tall buildings</p>			1		D4 Tall buildings	Design	Reg18-E-073/024	Notting Hill Genesis	Reg18-E-073

Comment Response	
Comment	<p>proposed outside of identifies zones can be acceptable, where they result in public benefit and are in accordance with the development plan as a whole. This, in addition to the Government's rhetoric to promote and prioritise brownfield over greenfield land (as currently set out within the ongoing NPPF consultation) demonstrate the need for a more flexible approach.</p>
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
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Whilst the retrofit of existing building stock is encouraged, new developments and taller buildings are necessary to meet current housing demand. A range of policies in the Climate emergency part of the Plan will ensure that new developments will be designed and constructed to be Net Zero Carbon in operation, without effecting the local environment and to generate renewable energy. If a development is unable to generate sufficient renewable energy onsite to meet demand, the policy enables an offsite process so that compensatory energy generation can occur on other buildings in the borough.</p>				D4		D4 Tall buildings	Design	Reg18-E-027/007	Resident	Reg18-E-027

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need.</p> <p>Furthermore, Policy D9 part B requires boroughs to define the maximum heights that could be acceptable in these locations. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. Suitable location and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets.</p> <p>Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>				2		D4 Tall buildings	Design	Reg18-E-082/031	Resident	Reg18-E-082

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Due to its emerging context, its District Centre designation with a high level of public transport accessibility, and its capacity for growth within the Royal Dock & Beckton Riverside Opportunity Area, the Limmo site has been identified as a suitable area for tall buildings. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p> <p>The impacts of overlooking and loss of privacy, overshadowing, and overbearing massing on neighbouring residential properties are addressed in Policy D7.3 and they will be assessed during the masterplanning and the planning application process.</p>					N5.SA4 Limmo	D4 Tall buildings	Design	Reg18-E-006/004	Resident	Reg18-E-006

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Due to its emerging context, its District Centre designation with a high level of public transport accessibility, and its capacity for growth within the Royal Dock & Beckton Riverside Opportunity Area, the Limmo site has been identified as a suitable area for tall buildings. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p> <p>The impacts of overlooking and loss of privacy, overshadowing, and overbearing massing on neighbouring residential properties are addressed in Policy D7.3 and they will be assessed during the masterplanning and the planning application process.</p>					N5.SA4 Limmo	D4 Tall buildings	Design	Reg18-E-007/002	Resident	Reg18-E-007

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Due to its emerging context, its District Centre designation with a high level of public transport accessibility, and its capacity for growth within the Royal Dock & Beckton Riverside Opportunity Area, the Limmo site has been identified as a suitable area for tall buildings. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p> <p>The impacts of overlooking and loss of privacy, overshadowing, and overbearing massing on neighbouring residential properties are addressed in Policy D7.3 and they will be assessed during the masterplanning and the planning application process.</p>					N5.SA4 Limmo	D4 Tall buildings	Design	Reg18-E-008/004	Resident	Reg18-E-008

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Due to its emerging context, its District Centre designation with a high level of public transport accessibility, and its capacity for growth within the Royal Dock & Beckton Riverside Opportunity Area, the Limmo site has been identified as a suitable area for tall buildings. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p> <p>The impacts of overlooking and loss of privacy, overshadowing, and overbearing massing on neighbouring residential properties are addressed in Policy D7.3 and they will be assessed during the masterplanning and the planning application process.</p>					N5.SA4 Limmo	D4 Tall buildings	Design	Reg18-E-010/002	Resident	Reg18-E-010

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Due to its emerging context, its District Centre designation with a high level of public transport accessibility, and its capacity for growth within the Royal Dock & Beckton Riverside Opportunity Area, the Limmo site has been identified as a suitable area for tall buildings. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p> <p>The impacts of overlooking and loss of privacy, overshadowing, and overbearing massing on neighbouring residential properties are addressed in Policy D7.3 and they will be assessed during the masterplanning and the planning application process.</p>					N5.SA4 Limmo	D4 Tall buildings	Design	Reg18-E-013/002	Resident	Reg18-E-013

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Due to its emerging context, its District Centre designation with a high level of public transport accessibility, and its capacity for growth within the Royal Dock & Beckton Riverside Opportunity Area, the Limmo site has been identified as a suitable area for tall buildings. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p> <p>The impacts of overlooking and loss of privacy, overshadowing, and overbearing massing on neighbouring residential properties are addressed in Policy D7.3 and they will be assessed during the masterplanning and the planning application process.</p>					N5.SA4 Limmo	D4 Tall buildings	Design	Reg18-E-029/002	Resident	Reg18-E-029

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-090	Resident	Reg18-E-090/004	Design	D4 Tall buildings			Table 1: Tall Building Zones			[Document problems] @ E.g. page 62, as many bldgs. are already far taller, your use of the term 'prevailing heights' of bldgs is confusing: dictionary says it means 'current' but you seem too often (always?) use it to mean the main heights of the proposed bldgs.	This wording change has not been made. We did not consider this change to be necessary as the term 'prevailing' also means 'prevalent' or 'main' and as such the term refers to the heights most buildings should be, within the proposed Tall Building Zones.
Reg18-E-090	Resident	Reg18-E-090/006	Design	D4 Tall buildings			TBZ15: West Ham Station			Specific p61 I'm assuming the 1/3 km tall bldg is a mistake!	This was an error and has now been corrected. Please see the new wording in policy D4, TBZ15: West Ham Station.
Reg18-E-098	Resident	Reg18-E-098/030	Design	D4 Tall buildings			D4			Tall buildings will re-create the management and maintenance problems of the 60s/70's, are not suitable for families with children and should be avoided wherever possible.	A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. The need for family homes and their quality are addressed through a range of policies in the Local Plan, including housing mix and design.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Nevertheless, the implementation text D4.2 clearly states that “<i>A Tall Building Zone designation does not mean that all development within it can or should be delivered as tall buildings.</i>”</p> <p>Suitable locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>				D4		D4 Tall buildings	Design	Reg18-E-098/031	Resident	Reg18-E-098

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets and N8.SA8 Bridgewater Road site allocation falls in the least sensitive area of the TBZ18: Stratford High Street.</p> <p>Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p> <p>The impacts of overlooking and loss of privacy, overshadowing, and overbearing massing on neighbouring residential properties are addressed in Policy D6.3 and they will be assessed during the masterplanning and the planning application process.</p>			Design Principles		N8.SA8 Bridgewater Road	D4 Tall buildings	Design	Reg18-E-137/002	Resident	Reg18-E-137

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets and N8.SA8 Bridgewater Road site allocation falls in the least sensitive area of the TBZ18: Stratford High Street.</p> <p>Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p> <p>The impacts of overlooking and loss of privacy, overshadowing, and overbearing massing on neighbouring residential properties are addressed in Policy D6.3 and they will be assessed during the masterplanning and the planning application process.</p>				Design Principles	N8.SA8 Bridgewater Road	D4 Tall buildings	Design	Reg18-E-137/003	Resident	Reg18-E-137

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets and N8.SA8 Bridgewater Road site allocation falls in the least sensitive area of the TBZ18: Stratford High Street.</p> <p>Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p> <p>The impacts of overlooking and loss of privacy, overshadowing, and overbearing massing on neighbouring residential properties are addressed in Policy D6.3 and they will be assessed during the masterplanning and the planning application process.</p>				Design Principles	N8.SA8 Bridgewater Road	D4 Tall buildings	Design	Reg18-E-137/005	Resident	Reg18-E-137

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets and N8.SA8 Bridgewater Road site allocation falls in the least sensitive area of the TBZ18: Stratford High Street.</p> <p>Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p> <p>The impacts of overlooking and loss of privacy, overshadowing, and overbearing massing on neighbouring residential properties are addressed in Policy D6.3 and they will be assessed during the masterplanning and the planning application process.</p>				Design Principles	N8.SA8 Bridgewater Road	D4 Tall buildings	Design	Reg18-E-137/012	Resident	Reg18-E-137

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets and N8.SA8 Bridgewater Road site allocation falls in the least sensitive area of the TBZ18: Stratford High Street.</p> <p>Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p> <p>The impacts of overlooking and loss of privacy, overshadowing, and overbearing massing on neighbouring residential properties are addressed in Policy D6.3 and they will be assessed during the masterplanning and the planning application process.</p>				D4	N8.SA8 Bridgewater Road	D4 Tall buildings	Design	Reg18-E-138/001	Resident	Reg18-E-138

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets and N8.SA8 Bridgewater Road site allocation falls in the least sensitive area of the TBZ18: Stratford High Street.</p> <p>Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p> <p>The impacts of overlooking and loss of privacy, overshadowing, and overbearing massing on neighbouring residential properties are addressed in Policy D6.3 and they will be assessed during the masterplanning and the planning application process.</p>				1		D4 Tall buildings	Design	Reg18-T-002/042	Resident	Reg18-T-002

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets and N8.SA8 Bridgewater Road site allocation falls in the least sensitive area of the TBZ18: Stratford High Street.</p> <p>Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p> <p>The impacts of overlooking and loss of privacy, overshadowing, and overbearing massing on neighbouring residential properties are addressed in Policy D6.3 and they will be assessed during the masterplanning and the planning application process.</p>				1		D4 Tall buildings	Design	Reg18-T-002/043	Resident	Reg18-T-002

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 Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).						D4 Tall buildings	Design	Reg18-T-010/003	Resident	Reg18-T-010
	London Plan (2021) Policy D9 sets out a comprehensive list of criteria for tall buildings to meet, including environmental impacts. The impact of tall buildings has been taken into consideration and addressed in the Policy D4.3 which requires microclimate consideration, including wind and air quality assessments. To stress the importance of wind assessment in high streets and town centres, a wording change has been made. Please see the new wording in policy D4.3.	D4.3					D4 Tall buildings	Design	Reg18-T-034/009	Resident	Reg18-T-034
	Support noted.						D4 Tall buildings	Design	Reg18-T-043/003	Resident	Reg18-T-043

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. No additions have been made.	[Add to it] ?		D4			D4 Tall buildings	Design	Reg18-T-057/011	Resident	Reg18-T-057

Reg18-T-058	Resident	Reg18-T-058/020	Design	D4 Tall buildings			D4		D4.3	<p>[Keep it] All buildings at the top should have greenery like trees, plants to fight air pollution</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 already provides a strong approach to the need for developments to consider appropriate green infrastructure to provide benefits, which can include the mitigation of air pollution.</p> <p>Policy GWS1 already requires all development to consider from the outset the form, function, and extent of green infrastructure opportunities, to maximise urban greening and improvements to Newham's network of green links as part of schemes. GWS3 requires development to maximise the 'living building' elements as a key feature of the site and building design. Living building elements enhance biodiversity, examples of living building elements include, but are not limited to green and brown roofs. Policy GWS4 seeks to protect and help to deliver a network of improved tree stock and canopy cover. The Local Plan recommends that developers mitigate the impact of air pollution by following the guidance in the Greater London Authority publication: Using Green Infrastructure to Protect People from Air Pollution (2019). It provides best practice on how green infrastructure can reduce exposure to air pollution in an urban environment</p> <p>The Climate Change Evidence Base – Operational energy and carbon evidence base (2022) outlines that that roof space should be prioritised for solar photovoltaic panels. Improvements to biodiversity should be directed elsewhere (such as ground level landscaping). The evidence base does note that some roof area can be used for plant</p>
-------------	----------	-----------------	--------	-------------------	--	--	----	--	------	--	---

												equipment, private/shared amenity space or biodiversity while meeting policy requirements for renewable energy generation. Policy CE6 of the Local Plan has been informed by this evidence base. It requires all development to mitigate and improve Newham's poor air quality. The policy requires development along Development along major roads or in other locations that experience poor air quality to improve the dispersal of identified pollutants and reduce exposure.
--	--	--	--	--	--	--	--	--	--	--	--	---

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. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).						D4 Tall buildings	Design	Reg18-T-062/002	Resident	Reg18-T-062
	Comment noted. This part of the Plan has now been expanded to ensure tall building developments are well integrated with their wider context and define a good quality public realm. Please see the new wording in D4.3 and D4.4 and implementation text. Site allocations provide additional design guidance to clarify how development proposals for tall buildings in proximity to sensitive areas should respond to the historic environment and manage the transition between conserve and transform areas.	D4.4					D4 Tall buildings	Design	Reg18-T-072/002	Resident	Reg18-T-072

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. This part of the Plan has now been expanded to ensure tall building developments are well integrated with their wider context and define a good quality public realm. Please see the new wording in D4.3 and D4.4 and implementation text. Site allocations provide additional design guidance to clarify how development proposals for tall buildings in proximity to sensitive areas should respond to the historic environment and manage the transition between conserve and transform areas.	D4.4		D4			D4 Tall buildings	Design	Reg18-T-072/003	Resident	Reg18-T-072
	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. No additions have been made.			D4			D4 Tall buildings	Design	Reg18-T-098/006	Resident	Reg18-T-098

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. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Due to its emerging context, its District Centre designation with a high level of public transport accessibility, and its capacity for growth within the Royal Dock & Beckton Riverside Opportunity Area, the Limmo site has been identified as a suitable area for tall buildings whilst enabling the continuation of the Leaway riverside walk. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).	D4.3		D4			D4 Tall buildings	Design	Reg18-T-103/010	Resident	Reg18-T-103

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these location. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”.</p> <p>In line with Policy D9, Policy D4. 2 and implementation text D4.2, seek to protect the spatial hierarchy of the plan. The varying heights within Tall Building Zones allows for transitioning heights to the surrounding context and sensitive areas. Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>				Table 1: Tall Building Zones		D4 Tall buildings	Design	Reg18-T-114/002	Resident	Reg18-T-114

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”.</p> <p>Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>			TBZs 4-11			D4 Tall buildings	Design	Reg18-E-092/017	Royal Docks	Reg18-E-092

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has been made. Strategic Industrial Locations have been considered and designated as Tall Building Zones where appropriate. The wording you have suggested has not resulted in a change as we did not consider this change to be necessary as suitable location and heights for tall buildings are identified instead in Policy D4.2. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).	d. Draft Policy D4 (Tall buildings) Part 1 of the policy sets out that tall buildings in Newham are defined as those at or over 21m in height. Whilst the viability of multi-level industrial buildings is challenging at this time, the plan should enable and facilitate these typologies in the future, should they become deliverable, as this will support the local plan's objective to intensify industrial land. To achieve this, it will be essential for policy to allow for taller building heights in industrial locations. For example, SEGRO V-Park Grand Union is c. 35m tall and such a height is required to achieve the efficiency needed to enable such building typologies. <u>Therefore, we propose an extra part is added to Policy D4 which states that tall buildings of c. 30-40m can be potentially appropriate in SIL, subject to further masterplanning and testing.</u> This approach will help ensure that SIL intensification objectives in Newham are met.			1		D4 Tall buildings	Design	Reg18-E-116/019	SEGRO Plc	Reg18-E-116

Reg18-E-069	Silvertown Homes Ltd	Reg18-E-069/018	Design	D4 Tall buildings	N3.SA4 Thameside West		TBZ13: Canning Town		<p>Policy D4 (Tall Buildings) & Page 64 (Map of Newham's 20 Tall Building Zones) - Objection</p> <p>Policy D4 and its supporting diagram (Page 64) identifies the location and extent of areas that are appropriate for tall buildings. This area includes the west part of the Thameside West site but excludes the eastern part of the Thameside West site. However, as explained above, the Extant Mixed-Use Permission for the wider site is supported by a Parameter Plan 04 Ref: A-SL-011-XX-05 Rev 04) which allow for tall buildings across the wider site (see Appendix 1), including:</p> <ul style="list-style-type: none"> • 13 to 21-storeys in Phase 1 (Buildings A & B); • Up to 74.4m (20-storeys) in Phase 2 (Buildings D & E); • Up to 84.8m (23-storeys) in Phase 3 (Buildings C & F); and • Up to 91.2m (24-storeys) in Phase 4 (Building G). <p>These phases of the Extant Mixed-Use Permission, which include tall buildings, are located on the east part of the Thameside West site and currently excluded from the tall buildings zone (TBZ13). Therefore, it is inappropriate to:</p> <ul style="list-style-type: none"> • Exclude the east part of the Thameside West site from the tall building zone (TBZ13); • To limit the height of the tall buildings on the wider Thameside West site to a maximum of 50m on the map (page 64); and • State in the Table 1 (page 60) that: "...In 	<p>This policy approach has now changed following further analysis undertaken and outlined in the Tall Buildings Annex (2024). Through this analysis it was concluded that the 50m tall building zone could be extended to include the eastern part of the site which has the same suitability to tall building developments of the western part of the site. The change you have suggested has not resulted in a change as, whilst we acknowledge that consents have been granted with tall elements at greater heights than the heights allowed within the tall building zone designation in the emerging plan and that the site can still benefit from these consents, these consents were permitted under the adopted Local Plan. The draft emerging Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context. Based on the methodology used to identify suitable locations and heights for tall buildings, and due to its location in an area with limited accessibility to public transport, N2.SA4 Thameside West is not considered appropriate for 100m Tall Building Zone designation. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024). Furthermore, this policy approach has now changed to ensure a consistency approach to referencing heights in Policy D4 and the Neighbourhood policies. Please see the new wording in Table 1: Tall Building Zone, TBZ13: Canning Town and relevant site allocations, including N2.SA4 Thameside West.</p>
-------------	----------------------	-----------------	--------	-------------------	-----------------------	--	---------------------	--	--	--

									<p>the rest of the Tall Building Zone, including to mark the new DLR station and local centre at Thameside West, limited additional tall buildings with elements of up to 50m, could be integrated carefully to aid wayfinding and mark special locations ” [our emphasis].</p> <p>Recommendation</p> <p>SHL suggest that:</p> <ul style="list-style-type: none"> • Tall building zone TBZ13 identified on page 64 should be extended to include the east part of the Thameside West site [LBN may choose to give the Thameside West site a separate TBZ reference]; • The maximum height for TBZ13 indicated on the map (page 64) should be adjusted to recognise the extant planning permission. This should be up to 100m (purple) to reflect the colours indicated in the legend that supports the tall buildings map; and • The maximum height for TBZ13 indicated in Table 1 (page 60) should be adjusted to recognise the extant planning permission. This should be up to 100m. <p>Policies Map – Objection</p> <p>In view of the above comments in relation to TBZ13, the Proposals Map should also be amended accordingly.</p> <p>Recommendation</p> <p>SHL suggest that:</p> <ul style="list-style-type: none"> • Tall building zone TBZ13 identified on 	
--	--	--	--	--	--	--	--	--	---	--

										<p>the Policies Map should be extended to include the east part of the Thameside West site [LBN may choose to give the Thameside West site a separate TBZ reference]; and</p> <ul style="list-style-type: none"> • The maximum height for TBZ13 indicated on the Policies Map (page 64) should be adjusted to recognise the extant planning permission. This should be up to 100m (purple) to reflect the colours indicated in the legend that supports the tall buildings map. 	
--	--	--	--	--	--	--	--	--	--	--	--

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Support noted.	Policy D4 sets out the definition of a tall building (which is consistent with the London Plan and supported) and sets out the designated Tall Building Zones within the borough where tall buildings will be supported. This includes guidance on heights within each Tall Building Zone. The Berkeley Group supports the inclusion of guidance on tall buildings in the borough and the designation of Tall Building Zones in line with Policy D9 of the London Plan and agrees that tall buildings should be subject to detailed design and masterplanning considerations.		D4			D4 Tall buildings	Design	Reg18-E-136/068	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
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and clearly states that “Tall buildings should only be developed in locations that are identified as suitable in Development Plans.” Tall buildings outside of tall building zones will, in line with Policy D9 of the London Plan, be considered a departure from the Plan.</p> <p>Policy D3 of the London Plan seeks to optimise site capacity through the design-led approach promoting the “most appropriate form of development that responds to a site’s context and capacity for growth, and existing and planned supporting infrastructure capacity”.</p> <p>In line with both Policy D9 and Policy D3 suitable locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>				2		D4 Tall buildings	Design	Reg18-E-136/069	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
	This policy approach has now changed to reflect uncertain project timeframes and the desire to enable early sustainable development. Policy wording to support suitably scaled and located deadweight development to enable development have now been included. In agreement with Transport for London, it is considered that the most sustainable location for this early phased development is the part of the site within easy walking distance of Gallions Reach DLR station. Transformation of the rest of the site remains contingent on delivery of the new DLR station and route or similarly transformative (as confirmed by Transport for London public transport intervention). Please see the new wording in TBZ5: Gallions Reach and N17.SA1 Beckton Riverside Development Principles.			TBZ5: Gallions Reach		N1.SA1 Beckton Riverside	D4 Tall buildings	Design	Reg18-E-136/070	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			
	<p>This policy approach has now changed to reflect uncertain project timeframes and the desire to enable early sustainable development. Policy wording to support suitably scaled and located deadweight development to enable development have now been included. In agreement with Transport for London, it is considered that the most sustainable location for this early phased development is the part of the site within easy walking distance of Gallions Reach DLR station. Transformation of the rest of the site remains contingent on delivery of the new DLR station and route or similarly transformative (as confirmed by Transport for London public transport intervention). Please see the new wording in TBZ5: Gallions Reach and N17.SA1 Beckton Riverside Development Principles. The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as, based on the sieving exercise undertaken to identify suitable location for tall buildings across the borough and, due to its sensitive location in proximity to low rise context and in an area with limited accessibility to public transport, the TBZ5: Gallions Reach it is not considered suitable to accommodate greater height. More details on the methodology used to identify suitable locations for tall buildings can be found on the Tall Building Annex (2024).</p>					TBZ5: Gallions Reach				D4 Tall buildings	Design	Reg18-E-136/071	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
	This policy approach has now changed to reflect uncertain project timeframes and the desire to enable early sustainable development. Policy wording to support suitably scaled and located deadweight development to enable development have now been included. In agreement with Transport for London, it is considered that the most sustainable location for this early phased development is the part of the site within easy walking distance of Gallions Reach DLR station. Transformation of the rest of the site remains contingent on delivery of the new DLR station and route or similarly transformative (as confirmed by Transport for London public transport intervention). Please see the new wording in TBZ5: Gallions Reach and N17.SA1 Beckton Riverside Development Principles. The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as, based on the sieving exercise undertaken to identify suitable location for tall buildings across the borough and, due to its sensitive location in proximity to low rise context and in an area with limited accessibility to public transport, the TBZ5: Gallions Reach it is not considered suitable to accommodate greater height. More details on the methodology used to identify suitable locations for tall buildings can be found on the Tall Building Annex (2024).			TBZ5: Gallions Reach		N1.SA1 Beckton Riverside	D4 Tall buildings	Design	Reg18-E-136/072	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
	<p>This policy approach has now changed to reflect the desire to enable early sustainable development before the delivery of the new DLR with permissible height that aligns with the wider context. In agreement with Transport for London, it is considered that the most sustainable location for this early phased development is the part of the site within easy walking distance of Gallions Reach DLR station. Transformation of the rest of the site remains contingent on delivery of the new DLR station and route or similarly transformative (as confirmed by Transport for London public transport intervention).</p> <p>Furthermore, this policy approach has now changed to ensure a consistent approach to referencing heights in Policy D4 and the Neighbourhood policies.</p> <p>Please see the new wording in TBZ5: Gallions Reach and N17.SA1 Beckton Riverside Development Principles.</p>				TBZ5: Gallions Reach		D4 Tall buildings	Design	Reg18-E-136/073	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
	Comment noted. A review of permitted heights was part of the methodology to establish the maximum heights. However, the new plan is setting a new policy direction, as informed by London Plan Policy D9. Whilst we acknowledge that consents have been granted to the site at a greater height of the maximum permissible height, and that those sites can still benefit from existing consents, the maximum permissible heights seek to preserve the spatial hierarchy aspiration of the plan and the gradual transition to the surrounding context. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).			TBZ15: West Ham Station		N7.SA2 Parclforce	D4 Tall buildings	Design	Reg18-E-136/074	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
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as a review of permitted heights was part of the methodology to establish the maximum heights and the new plan is setting a new policy direction, as informed by London Plan Policy D9. Whilst we acknowledge that consents have been granted and that the site can still benefit from existing consents, the maximum permissible heights seek to preserve the spatial hierarchy aspiration of the plan. More details on the methodology used to identify suitable locations and heights for tall buildings can be found in the Tall Building Annex (2024).</p> <p>However, this policy approach has now changed to ensure a consistent approach to referencing heights in Policy D4 and the Neighbourhood policies. Please see the new wording in Policy D4, TBZ15: West Ham Station and N7.SA2 Twelvetreets Park and Former Bromley By Bow Gasworks site allocations.</p>					TBZ15: West Ham Station					Reg18-E-136
	<p>Prevailing heights of between 21m and 32m is not reflective of what has been consented nor the heights this strategic site can accommodate. Tall buildings should follow a design led approach in line with policy D3 and prevailing heights should be between 30m and 60 m.</p>						D4 Tall buildings	Design	Reg18-E-136/075	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
	A change to this policy approach has not been made. We did not consider this change to be appropriate as, whilst we acknowledge that the impact of tall buildings will be assessed during the masterplanning and the planning application process, Policy D4, in conjunction with other design policies, seeks to protect the listed Gasholders and the role they play to placemaking. The wording of Policy D4 and relevant site allocation design principles has been changed to clarify how development proposals of tall buildings in proximity to sensitive areas could respond to the historic environment and manage the transition between conserve and transform areas. Please see the new wording in Table 1: Tall Building Zones, D4.3 and relevant site allocations, including N7.SA2 Twelvetrees Park and Former Bromley By Bow Gasworks.	Heights should not be prescribed for buildings within the vicinity of the gasholders as they will be determined via the design led approach and through a thorough townscape and visual impact assessment.		TBZ15: West Ham Station		N7.SA2 Parcellforce	D4 Tall buildings	Design	Reg18-E-136/076	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
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy D4.2 already states that not all developments within a tall building designation should be delivered as tall buildings. Tall buildings are supported on the site and tall building elements up to 100m are supported in the less sensitive areas and to mark the local centre. The 32m and 50m tall building zones are fundamental to preserve a borough wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context. However, the wording has been changed to reflect comments on the impact that tall buildings could have on watercourses and historic assets and to ensure that tall building developments don't have any impact on the Three Mills conservation area and on the River Lea. Please see the new wording in TBZ15: West Ham Station and N7.SA2 Twelvetreepark and Former Bromley By Bow Gasworks site allocation.</p>									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
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and clearly states that “Tall buildings should only be developed in locations that are identified as suitable in Development Plans.”</p> <p>Policy D3 of the London Plan seeks to optimise site capacity through the design-led approach promoting the “most appropriate form of development that responds to a site’s context and capacity for growth, and existing and planned supporting infrastructure capacity”.</p> <p>In line with both, Policy D9 and Policy D3 suitable locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets.</p> <p>Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found on the Tall Building Annex (2024).</p> <p>Furthermore, a main building datum (prevailing height) has been identified to ensure a good relationship between proposed tall elements and prevailing heights of the context.</p>						D4 Tall buildings	Design	Reg18-E-136/078	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
	<p>This policy approach has not been changed. We did not consider this change to be appropriate as, based on the sieving exercise to identify tall building locations and maximum height and due to its proximity to the Sugar House Lane and Stratford St. Johns conservation areas, the TBZ18: Stratford High Street it is not considered appropriate to accommodate greater height.</p> <p>Due to its emerging context, its Metropolitan Centre nature and its capacity for growth, the TBZ19: Stratford Central has been identified as the area of maximum capacity in the Borough, with opportunities for tall elements up to 100m. The proposed maximum permissible heights seek to preserve the spatial hierarchy aspiration of the plan and on TBZ18: Stratford High Street it is considered appropriate for a gradual transition from the higher cluster to the surrounding context.</p> <p>More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>	Limited tall building elements should be able to extend up to 100 m.			TBZ18: Stratford High Street		D4 Tall buildings	Design	Reg18-E-136/079	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
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. In line with London Plan Policy D9, varying heights across Tall Building Zones allows to achieve the spatial hierarchy aspiration of the plan and transitioning heights to surrounding context and sensitive areas.</p> <p>More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>	Areas should not be defined for different height thresholds and instead a design led approach applied across the entire site.			TBZ18: Stratford High Street		D4 Tall buildings	Design	Reg18-E-136/080	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
	This policy approach has not been changed. We did not consider this change to be appropriate as, based on the sieving exercise to identify tall building locations and maximum heights, it is not considered appropriate to accommodate greater heights on TBZ18: Stratford High Street. The proposed maximum permissible heights seek to preserve the spatial hierarchy aspiration of the plan and TBZ18: Stratford High Street is considered appropriate for a gradual transition from the higher cluster - i.e. TBZ19: Stratford Central - to the surrounding context. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).						D4 Tall buildings	Design	Reg18-E-136/081	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136
	A change to this policy approach has not been made. We did not consider this change to be appropriate as, based on the sieving exercise undertaken to identify suitable locations for tall buildings across the borough and, due to its sensitive location in proximity to a Site of Importance for Nature Conservation (SINC), low rise context and in an area with limited accessibility to public transport, the N13.SA3 Former East Ham Gasworks site allocation is not considered suitable to accommodate tall building developments. More details on the methodology used to identify suitable locations for tall buildings					N13.SA3 Former East Ham Gasworks	D4 Tall buildings	Design	Reg18-E-136/082	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136
	The policy should not prescribe that all tall buildings must be lower than the height of existing tall buildings.					TBZ18: Stratford High Street					
	The East Ham Tall Building Zone should include N13.SA3 Former East Ham Gasworks owing to the scale of the existing gasholder on site which extends to circa 52m AOD in height. Table 1 of Policy D4 should therefore be revised to reflect the height of the existing gas holder.					N13.SA3 Former East Ham Gasworks					

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	can be found in the Tall Building Annex (2024).										
	Gasholders are metal structures rather than buildings, therefore, we disagree with your interpretation that Newham Characterisation Study (2023) have omitted the existing gasholders from the Existing Height Map.	The Council's Characterisation Study (December 2022) has omitted the existing tall building on site page 168) and unlike the other gasworks in the Borough, is subject to limited reference within the study.	Evidence Base: Newham Characterisation Study: Maccreanor Levington with New Practice, Avison Young and	TBZ3: East Ham		N13.SA3 Former East Ham Gasworks	D4 Tall buildings	Design	Reg18-E-136/083	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
		GHPA (2022)									
	This wording approach has now changed to acknowledge that different shoulder height to street ratios could be necessary to define the hierarchy of different type of streets in a high density environment. Please see the new wording in policy D4.4 and implementation text D4.4. The wording you have suggested has not resulted in a change as we did not consider this change to be appropriate as policy D4.4 seeks to support a comfortable sense of enclosure at street level and a high quality street environment in the presence of tall building developments in all circumstances.	D4.4 Point 4 of Policy D4 states that in addressing the relationship of the proposed tall building with its context: a) the base (shoulder height) of tall buildings should respect a 1:1 scale relative to the width of the street. This requirement does not acknowledge the different building forms that can come forward or site specific circumstances and it may not be possible to meet this requirement particularly for gasworks sites where redevelopment will result in the creation of new neighbourhoods. The Berkeley Group therefore suggest that the text includes 'where possible or feasible'.					D4 Tall buildings	Design	Reg18-E-136/084	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136
	Comment noted.	[East Ham Gasworks] Summary of Proposed Amendments: Identification of existing/proposed tall building			TBZ3: East Ham	N13.SA3 Former East Ham Gasworks	D4 Tall buildings	Design	Reg18-E-136/314	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
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as, based on the sieving exercise undertaken to identify suitable locations for tall buildings across the borough and, due to its sensitive location in proximity to a Site of Importance for Nature Conservation (SINC), low rise context and in an area with limited accessibility to public transport, the N13.SA3 Former East Ham Gasworks site allocation it is not considered suitable to accommodate tall building developments.</p> <p>More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>				TBZ3: East Ham	N13.SA3 Former East Ham Gasworks	D4 Tall buildings	Design	Reg18-E-136/316	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
	<p>Gasholders are metal structures rather than buildings, therefore, we disagree with your interpretation that Newham Characterisation Study (2023) has omitted the existing gasholders from the Existing Height Map and consider instead that their heights cannot be considered justifications for new tall buildings.</p> <p>However, Newham Characterisation Study (2023) has been supplemented with a Tall Building Annex (2024). The document summarizes the sieving exercise that has been undertaken to identify locations where tall buildings may be an appropriate form of development and expands on the townscape assessment for each area of the borough. Suitable location and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets.</p> <p>More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>	<p>The Newham Characterisation Study (December 2022) has omitted the existing tall building on site (page 168) and unlike the other gasworks in the Borough, is subject to limit reference within the study. [East Ham Gasworks]</p>		TBZ3: East Ham		N13.SA3 Former East Ham Gasworks	D4 Tall buildings	Design	Reg18-E-136/320	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
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as, based on the sieving exercise undertaken to identify suitable locations for tall buildings across the borough and, due to its sensitive location in proximity to a Site of Importance for Nature Conservation (SINC), low rise context and in an area with limited accessibility to public transport, the N13.SA3 Former East Ham Gasworks site allocation is not considered suitable to accommodate tall building developments.</p> <p>More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>						D4 Tall buildings	Design	Reg18-E-136/336	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
	Gasholders are metal structures rather than buildings, therefore, we disagree with your interpretation that Newham Characterisation Study (2023) have omitted the existing gasholders from the Existing Height Map and consider instead that their heights cannot be considered justifications for new tall buildings. However, Newham Characterisation Study (2023) has been supplemented with a Tall Building Annex (2024). The document summarizes the sieving exercise that has been undertaken to identify locations where tall buildings may be an appropriate form of development and expands on the townscape assessment for each area of the borough. Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).	The Council's Characterisation Study (December 2022) has omitted the existing tall building on site page 168) and unlike the other gasworks in the Borough, is subject to limit reference within the study.	Evidence Base: Newham Characterisation Study: Maccrannor Levington with New Practice, Avison Young and GHPA (2022)		TBZ3: East Ham		D4 Tall buildings	Design	Reg18-E-136/337	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136
	Support noted.	[Appendix A] The proposed inclusion of Silvertown within a tall building zone is supported, and the hybrid planning application includes some buildings which would be considered tall buildings (most of which were approved as tall buildings in the Phase 1 RMA).			TBZ10: North Woolwich Road		N3.SA1 Silvertown Quays	Design	Reg18-E-111/027	The Silvertown Partnership LLP	Reg18-E-111

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This wording approach has now changed to acknowledge that different shoulder height to street ratios could be necessary to define the hierarchy of different type of streets in a high density environment. Please see the new wording in policy D4.4 and implementation text D4.4. The approach you have suggested has not resulted in a change as we did not consider this change to be appropriate as policy D4.4 seeks to support a comfortable sense of enclosure at street level and a high quality street environment in the presence of tall building developments.	D4.4				N3.SA1 Silvertown Quays	D4 Tall buildings	Design	Reg18-E-111/028	The Silvertown Partnership LLP	Reg18-E-111
	Unfortunately, it was not clear what change you wanted to make to this part of the Plan. No changes have been made.	D2.5				N3.SA1 Silvertown Quays	D4 Tall buildings	Design	Reg18-E-111/029	The Silvertown Partnership LLP	Reg18-E-111
	Comment noted.				1		D4 Tall buildings	Design	Reg18-E-080/025	Transport Trading Limited Properties Limited	Reg18-E-080

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		develop tall buildings in locations that are identified as suitable in Development Plans.									
	Comment noted.	Draft Policy D4 identifies tall building zones in Table 1, including maximum height limits and further guidance for each tall building zone. TTLP welcome the identification of a tall building zone at Canning Town (TBZ13), however there are concerns that the approach to setting maximum building heights has not been developed using a robust evidence base, and is therefore not fully justified.		TBZ13: Canning Town			D4 Tall buildings	Design	Reg18-E-080/026	Transport Trading Limited Properties Limited	Reg18-E-080

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Newham Characterisation Study (2023) has been supplemented with a Tall Building Annex (2024). The document summarizes the sieving exercise that has been undertaken to identify locations where tall buildings may be an appropriate form of development and expand on the townscape assessment for each area of the borough. Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).	D4.2 Evidence Base: Newham Characterisation Study: Maccrae and Levington with New Practice, Avison Young and GHPA (2022)		TBZ13: Canning Town		N5.SA4 Limmo	D4 Tall buildings	Design	Reg18-E-080/027	Transport Trading Limited Properties Limited	Reg18-E-080

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-080	Transport Trading Limited Properties Limited	Reg18-E-080/028	Design	D4 Tall buildings	N5.SA4 Limmo		TBZ13: Canning Town			<p>[See appendix in representation] TTLP have appointed Montagu Evans townscape consultants to analyse appropriate heights which could be achieved on the Limmo Peninsula. This report can be found at Appendix I of these representations. The visual analysis has been prepared to:</p> <ul style="list-style-type: none"> - consider the zone of theoretical visibility (to identify locations from which the development would be visible); - summarise the cumulative townscape context; and - provide a selection of long, medium and short range viewpoints to demonstrate what a 'blanket' 30 storey height (105.3m AOD) across the site would look like, as well as a hypothetical 30 storey tower development (30 storeys being the likely emerging masterplan height needed to deliver a viable scheme alongside a significant quantum of public open space at Limmo). <p>In the absence of any robust evidence base providing a justification for the proposed building heights being arbitrarily capped at 60m at Limmo, the Montagu Evans analysis demonstrates that the site is capable of accommodating tall buildings of 30 storeys in height. Indeed, tall buildings at Limmo would not contribute to the Canning Town skyline reaching saturation point. As such we request that that the</p>	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as while we have taken into consideration your information our conclusion remains that, in line with the methodology used to identify suitable locations and heights for tall buildings across the borough, N4.SA4 Limmo is not considered appropriate for a 100m Tall Building Zone designation. The maximum permissible heights seek to preserve the spatial hierarchy aspiration for the borough and Canning Town area.</p> <p>More details on the methodology used to identify suitable locations and height for tall buildings can be found in the Tall Building Annex (2024).</p> <p>However, this policy approach has now changed to ensure a consistent approach to referencing heights in Policy D4 and the Neighbourhood policies. Please see the new wording in Table 1: Tall Buildi+O181n Zone, TBZ13: Canning Town and N4.SA4 Limmo site allocation.</p>

Comment Response	
Comment	Council consider this detailed analysis of key townscape views when considering a sound, evidenced justification for taller building heights within the Limmo tall building zone.
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
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as while we have taken into consideration your information our conclusion remains that, in line with the methodology used to identify suitable locations and heights for tall buildings across the borough, N4.SA4 Limmo is not considered appropriate for a 100m Tall Building Zone designation. The maximum permissible heights seek to preserve the spatial hierarchy aspiration for the borough and Canning Town area.</p> <p>More details on the methodology used to identify suitable locations and height for tall buildings can be found in the Tall Building Annex (2024).</p> <p>However, this policy approach has now changed to ensure a consistent approach to referencing heights in Policy D4 and the Neighbourhood policies. Please see the new wording in Table 1: Tall Building Zone, TBZ13: Canning Town and N4.SA4 Limmo site allocation.</p>				TBZ13: Canning Town	N5.SA4 Limmo	D4 Tall buildings	Design	Reg18-E-080/029	Transport Trading Limited Properties Limited	Reg18-E-080

Reg18-E-102	Unibail-Rodamco-Westfield	Reg18-E-102/008	Design	D4 Tall buildings	N8.SA5 Stratford Town Centre West		TBZ19: Stratford Central		<p>Recommendation 1: Amend Site Allocation N8.SA5 to identify the M7B Site as a development site with the potential for residential-led mixed-use development in a tall building.</p> <p>The shortcomings of the proposed tall buildings designation in meeting the need for housing and mixed use development in the Metropolitan Centre and the lack of recognition for the established character of the SCE and surroundings, and its low sensitivity to change</p> <p>Draft Policy D4 (Tall buildings) defines a tall building in Newham as those over 21m and defines on the draft Policies Map where Tall Building Zones (TBZs) are proposed to be located. TBZs are where tall buildings are proposed to be acceptable in principle and each TBZ includes proposed height limits.</p> <p>The Site is proposed to be located within a TBZ (TBZ19: Stratford Central), which is welcomed as a starting point, however the Site is located within a part of the TBZ proposed to be allocated for buildings up to 60m. This is at odds with the context of a consented masterplan parameter height of 110m AOD and the emerging context that includes the Cherry Park residential-led development of up to 142.5m AOD. See Appendix 2 for diagrams illustrating this.</p> <p>The evidence base supporting draft Policy D4 is the Newham Characterisation Study (2022) (the Study). The Study describes the Queen Elizabeth Olympic Park and its surrounds as follows: “An increasing typology of</p>	<p>This policy approach has now changed following further analysis undertaken and outlined in the Tall Buildings Annex (2024). Through this analysis it was concluded that the 100 m zone could be extended to continue the consolidated cluster around Cherry Park which aligns with the spatial hierarchy and objectives of the new Local Plan. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024). Please see the new wording in Table 1: Tall Building Zones, TBZ19: Stratford Central and N8.SA5 Stratford Town Centre West.</p>
-------------	---------------------------	-----------------	--------	-------------------	-----------------------------------	--	--------------------------	--	--	--

									<p>contemporary, mid-rise and tall residential and office buildings are emerging around Stratford City, north of Stratford town centre, and Stratford High Street, where there has been some redevelopment of former Council housing and gap sites.” (page 65). It identifies the Site and its immediate context as not being sensitive to change and within the 2018 Local Plan TBZ (page 145). It does not fall within an area that would be highly sensitive to change (page 144) and has been recognised as having a high opportunity for growth (page 146). The Site is located in the heart of the highest order town centre in the borough (page 147) and a “Transform” location on the map on page 151, reflecting its high public transport accessibility. The map on page 163 identifies a number of tall buildings in the immediate vicinity, including many over 100m.</p> <p>The Site does not fall within designated local or London View Management Framework views, so having taller buildings within it would “not adversely affect local or strategic views”, in accordance with the London Plan’s Policy D9 requirement. The Site does not fall within a conservation area or within an Area of Townscape Value, so development of tall buildings is unlikely to result in an adverse impact on heritage assets.</p> <p>Increasing the maximum heights of buildings on the Site would reflect the LLDC location, the emerging ‘transformation’ character of Stratford Metropolitan Centre, which has significant potential for densification,</p>	
--	--	--	--	--	--	--	--	--	--	--

										and would create an opportunity to improve its urban form and character, which accords with the methodology for defining TBZs as set out within the Study (page 165).	
--	--	--	--	--	--	--	--	--	--	---	--

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Support noted.	<p>Policy D4 'Tall Buildings' Part 2 of Policy D4 seeks to limit the height of tall buildings to heights set out in the associated table. The policy wording is as follows: 2. Tall buildings will only be acceptable, subject to detailed design and masterplanning considerations, in areas marked on the Policies Map as 'Tall Building Zones'. The height of tall buildings in any 'Tall Buildings Zone' should not exceed the respective limits set in Table 1 below.</p> <p>Unite making the following comments on the restrictions posed by this policy:</p> <ul style="list-style-type: none"> • The London Plan Policy D9 is clear that development plans should define what is considered as a tall building for specific localities. Unite acknowledge that the updated draft Local Plan Policy identifies and distinguishes clearly appropriate tall buildings locations. One such area where taller buildings should be accepted is in site allocation N8.SA2 Stratford Station and the Stratford and Mayland Neighbourhood Area and this is acknowledged. 			2 TBZ19: Stratford Central				Reg18-E-119/035	Unite Group plc	Reg18-E-119

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”.</p> <p>Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>				2 TBZ19: Stratford Central	N8.SA2 Stratford Station	D4 Tall buildings	Design	Reg18-E-119/036	Unite Group plc	Reg18-E-119

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference	
	<p>This policy approach has now changed to ensure a consistent approach to referencing heights in Policy D4 and the Neighbourhood policies. Please see the new wording in Table 1: Tall Building Zones and each site allocation. The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. In line with London Plan Policy D9, varying heights across Tall Building Zones allows to achieve the spatial hierarchy aspiration of the plan and transitioning heights to surrounding context and sensitive areas.</p> <p>More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>					2 TBZ19: Stratford Central	N8.SA2 Stratford Station	D4 Tall buildings	Design	Reg18-E-119/037	Unite Group plc	Reg18-E-119

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land.</p> <p>Furthermore, Policy D9 part B requires boroughs to define the maximum heights that could be acceptable in these locations. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Due to its emerging context, its Metropolitan Centre nature and its capacity for growth and its high level of accessibility, the TBZ19: Stratford Central has been identified as the area of maximum capacity in the Borough, with opportunities for tall elements up to 100m (ca. 33 storeys). More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>				2 TBZ19: Stratford Central	N8.SA2 Stratford Station	D4 Tall buildings	Design	Reg18-E-119/038	Unite Group plc	Reg18-E-119

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”.</p> <p>Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024). Furthermore, Policy D4 part 3 and its implementation text are clear that development proposals for tall buildings are required to address the criteria set by London Plan (2021) Policy D9 section C, including visual, functional, environmental and cumulative impact and to demonstrate them in a tall building section of the Design Access Statement.</p>									Unite Group plc	Reg18-E-119

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”.</p> <p>Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>								Reg18-E-119/040	Unite Group plc	Reg18-E-119
	Support noted.								Reg18-E-054/008a	University College London	Reg18-E-054

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as, whilst we acknowledge that consents have been granted to the remaining plots to be developed in UCL East site with tall elements at greater heights than the heights allowed within the tall building zone designation in the emerging plan and that the sites can still benefit from these consents, these consents were permitted under the LLDC Local Plan. The draft emerging Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough wide spatial hierarchy, avoid the scattered composition of tall buildings developed in the past years around Stratford and create a gradual and sensitive transition to the surrounding context.</p> <p>More details on the methodology used to identify suitable locations and height for tall buildings can be found on the Tall Building Annex (2024).</p> <p>However, the wording has been changed to reflect comments on the development principles and design principles. Please see the new wording in Policy D4, TBZ19: Stratford Central and relevant site allocation N8.SA6 Stratford Waterfront South.</p>					TBZ19: Stratford Central					<p>Reg18-E-054</p> <p>University College London</p> <p>Reg18-E-054/008b</p> <p>Design</p> <p>D4 Tall buildings</p> <p>N8.SA6 Stratford Waterfront South</p>

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this wording approach has not been made. We did not consider this change to be appropriate as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and Policy D9 part B (3) clearly states “Tall buildings should only be developed in locations that are identified as suitable in Development Plans.”. Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>	<p>Policy D4: Tall Buildings The wording of Draft Policy D4 defines tall buildings as those being at or over 21m, measured from the ground to the principal top of the building (usually a parapet). The draft policy goes on to state that tall buildings will only be acceptable, subject to detailed design and masterplanning considerations, in areas marked on the Policies Map as ‘Tall Building Zones’, and that the height of tall buildings in any ‘Tall Buildings Zone’ should not exceed their respective limits set out.</p> <p>UEL consider the wording of the draft policy to be too severe and not consistent with the objectives of positive plan-making, as set out in the NPPF, as it fails to take into account site-specific circumstances where tall buildings may be appropriate outside of designated Tall Building Zones. Therefore, it is suggested that the policy wording is relaxed, specifically in relation to the statement that “tall buildings will only be acceptable” [own emphasis], to instead state that “tall buildings will generally be acceptable...” [own emphasis].</p>			2		D4 Tall buildings	Design	Reg18-E-117/004	University of East London	Reg18-E-117

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as, based on the sieving exercise undertaken to identify suitable locations for tall buildings across the borough, and due to its sensitive locations in a conservation area, the site it is not considered suitable to accommodate tall building developments.</p> <p>Whilst we acknowledge that pre-application discussions have been held with LBN officers, the discussions are informed by the adopted Local Plan. The draft emerging Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context.</p> <p>More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>	<p>Notwithstanding this point, our client wishes to promote the UEL Stratford Campus as an appropriate site for designation as a ‘Tall Building Zone’, having regard to the substantial site area and existence of a building within the existing campus which would already be defined as a ‘tall building’, in line with the Draft Plan definition. The re-development of Stratford Campus proposes a 16-story building adjacent to the Arthur Edwards Building at 5 storeys already in context. We would also highlight the positive pre-application discussions which have taken place to date with LBN officers and other key stakeholders (including the LBN Design Review Panel) regarding redevelopment proposals which include the provision of a tall building on the campus. The designation of the UEL Stratford Campus as a ‘Tall Building Zone’ would support the future growth of UEL, a key institution within Newham, to allow the provision of student accommodation and academic facilities on the campus, in line with the Draft Plan’s vision for sustainable growth across the borough.</p>			Table 1: tall building zones		D4 Tall buildings	Design	Reg18-E-117/005	University of East London	Reg18-E-117

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as tall buildings outside of tall building zones will, in line with Policy D9 of the London Plan, be considered a departure from the Plan. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and clearly states that "Tall buildings should only be developed in locations that are identified as suitable in Development Plans." In line with Policy D9, suitable locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>	<p>UrBox Beckton Limited consider Part 2 of Policy D4 particularly restrictive for new development outside of identified Tall Building Zones given it proposes a 'blanket' policy for height restrictions on all buildings outside of identified zones.</p> <p>UrBox Beckton Limited therefore suggest the wording of Policy D4, Part 2 is revised as follows: "Tall buildings will be acceptable, subject to detailed design and masterplanning considerations, in areas marked on the Policies Map as 'Tall Building Zones'. The height of tall buildings in any 'Tall Buildings Zone' should not exceed the respective limits set in Table 1 below. Tall buildings in areas outside of identified Tall Building Zones should demonstrate acceptability with other Local Plan Policies, including Policy D1: Design Standards, and be assessed on a site-by-site basis."</p>			2		D4 Tall buildings	Design	Reg18-K-054/002	UrBox Beckton Limited	Reg18-K-054

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 necessary as N7.SA3 Sugar House Island site allocation is designated within TBZ18: Stratford High Street with a 32m zone tall building allocation, which set the maximum heights permissible in the area of Plot MU3 and a 50m tall building zone for the rest of the Sugar House Island site. Although the prevailing heights on Plot MU3 set a range of prevailing heights above 9m but below 21m, the maximum permitted height of 9 storeys aligns with the maximum permissible height of 32m outlined in the tall building zone in the emerging Local Plan. However, the wording has been changed to reflect comments on the development principles and design principles and to ensure a consistent approach to referencing heights in Policy D4 and the Neighbourhood policies. Please see the new wording in Table 1: Tall building zones, TBZ18: Stratford High Street and relevant site allocation N7.SA3 Sugar House Island.	The Policies Map Prevailing Height Indications With the exception only of the sub plot Mu3, the entire Sugar House Island development site approved under planning permission Reference 12/0036/LTGOUT is identified on the Policies Map by an orange diagonal hatch which in the key is 'Prevailing Height above 21m but below 32m (7-10 storeys)'. Sub plot Mu3 is identified as black diagonal hatching denoting a lower prevailing height of above 9m but below 21m (4-7 storeys). This is not justified in the circumstances where the Heights Parameter Plan (PP-1-103 rev P) approved as part of the site wide permission (reference 12/0036/LTGOUT), and which identifies heights across the entire site, identifies sub-plot MU3 as having 2-9 storeys. The 4-7 storey lower prevailing height is therefore at odds with the 9 storeys which are already approved and we do not consider there to be any justification for this. We therefore object to the prevailing heights identified for sub plot MU3 as this is incorrect and we request that it is changed to the orange diagonal hatch used for the wider site.			TBZ18: Stratford High Street		D4 Tall buildings	Design	Reg18-E-055/001	Vasint BV	Reg18-E-055

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 necessary as the maximum permitted heights of 16 storeys outlined in the Sugar House Lane outline masterplan refers to parts of the Sugar House Island which don't include the remaining plot MU3 to be developed. The consented heights on Plot MU3 instead range from 2 to 9 storeys, which align with the maximum permissible heights of 32m outlined in the tall building zone in the emerging Local Plan. Furthermore, as highlighted in the N7.SA3 Sugar House Lane design principles, the design and layout of plot MU3 should complete the rest of the site, following the same scale and character and preserve the identity of the island as a whole, therefore plot MU3 is not considered suitable for a 70m tall building zone. However, the wording has been changed to reflect comments on the development principles and design principles and to ensure a consistent approach to referencing heights in Policy D4 and the Neighbourhood policies. Please see the new wording in Table 1: Tall building zones, TBZ18: Stratford High Street and relevant site allocation N7.SA3 Sugar House Island.	The Policies Map also identifies a zone for tall buildings referred to as Tall Building Zone 18. Within the Sugar House Island allocated site two maximum heights are referred to. The entire site apart from the Mu3 subplot identified by a red dashed line and which is the same for all the surrounding land beyond High Street Stratford to the North and where buildings up to 50m will be allowed. The MU3 sub plot is indicated by a dashed pink line where the height range maximum is just 32m. The site wide permission (reference 12/0036/LTGOUT) identifies a range of heights across the site including accent towers which range from 35m to 53m in height. We therefore request an additional maximum height category of up to 70m and that the pink – 32 maximum zone is replaced by a 70m maximum height category on sub plot Mu3.		TBZ18: Stratford High Street		N7.SA3 Sugar House Island	D4 Tall buildings	Design	Reg18-E-055/002	Vasint BV	Reg18-E-055

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
						N8.SA4 Stratford High Street Bingo Hall	D4 Tall buildings	Design	Reg18-E-100/017	Zirconia Stratford Unit Trust	Reg18-E-100
	Building Heights and Tall Buildings Policy (Policies N8.SA4 and D4) Firstly, ZSUT support the allocation of Stratford High Street as a Tall Building Zone (ref. TBZ18) and support the inclusion of the Buzz Bingo Site within this.					TBZ18: Stratford High Street					
	Furthermore, they support the identification of the northern element of the Site fronting Stratford High Street being identified as suitable for the tallest element of the Site, and being included in a taller building zone than the remainder of the Site, as shown by Figure 3 below. [Image attached - Figure 3: Draft Proposals Map Extract (Tall Building Zones)]					TBZ18: Stratford High Street					
	Support noted.										
	Support noted.										

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>	<p>However, our client does not support the prescriptive approach to building heights for these tall building zones set out within Policy D4, and then reflected in the Site Allocation N8.SA4. The front of the Site is within a ‘Tall Building Zone up to 40 m (13 storeys)’ with the rest in ‘a Tall Building Zone up to 32 m (10 storeys)’. Draft Policy D4 states very strictly that “The height of tall buildings in any ‘Tall Buildings Zone’ should not exceed the respective limits set”.</p> <p>Having undertaken a full review of the draft Local Plan, and its evidence base including its Characterisation Study, it is not considered that sufficient justification has been provided to warrant these prescriptive height restrictions and as such these should be removed from the Plan. Such a prescriptive approach to building heights could only be supported by a robust townscape / skyline study that identifies and tests key local views.</p>		TBZ18: Stratford High Street		N8.SA4 Stratford High Street Bingo Hall	D4 Tall buildings	Design	Reg18-E-100/019	Zirconia Stratford Unit Trust	Reg18-E-100

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”.</p> <p>In line with London Plan Policy D9, varying heights across Tall Building Zones allows to achieve the spatial hierarchy aspiration of the plan and transitioning heights to surrounding context and sensitive areas. Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>						D4 Tall buildings	Design	Reg18-E-100/020	Zirconia Stratford Unit Trust	Reg18-E-100

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Newham Characterisation Study (2023) has been updated and supplemented with a Tall Building Annex (2024). The document summarizes the sieving exercise that has been undertaken to identify locations where tall buildings may be an appropriate form of development and expands on the townscape assessment for each area of the borough. Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).	The only evidence base document seems to have been prepared to inform the policies relating to tall buildings and building height is the Newham Characterisation Study 2022, prepared by Macreanor Lavington with New Practice, Avison Young and GHPA. Our client commends the detailed work and analysis undertaken within this evidence base surrounding local character, however, note that there is no specific Townscape Analysis or 'Skyline Study' of visual impact of tall buildings or from key views. It is considered that without this analysis, it is impossible to justify applying specific building height upper limits to tall building zones and site allocations.		D4			D4 Tall buildings	Design	Reg18-E-100/021	Zirconia Stratford Unit Trust	Reg18-E-100

Reg18-E-100	Zirconia Stratford Unit Trust	Reg18-E-100/022	Design	D4 Tall buildings	N8SA4: Stratford High Street Bingo Hall		TBZ18: Stratford High Street		<p>Evidence Base: Newham Characterisation Study: Maccrannor Levington with New Practice, Avison Young and GHPA (2022)</p> <p>We note the Site is allocated within the Newham Characterisation Study 2022 as being as being in an area industrial in character, and in a transition area to an urban neighbourhood. In the glossary, 'Urban Neighbourhood' is defined as consisting of "mid-rise and tall buildings of medium density residential, hotel and office use. They consist of mostly contemporary development that directly interface with the street with little or no defensible zones". Mid-rise is defined as 4-6 storeys, and tall buildings as greater than 7 storeys.</p> <p>We strongly disagree with the assessment that the Site falls within a 'transition area to an urban neighbourhood', and instead argue that the Site falls well within an urban neighbourhood by the Characterisation Study's own definition. The pictures provided in Figure 4 below, taken from within the Site and its surroundings, clearly show the sites context is already a dense, mixed use urban neighbourhood. This includes the Burford Wharf development to the south of the Site comprising mixed use residential and commercial blocks at 7-21 storeys; the 4-5 storey workspace blocks to the east of the Site along Burford Road; Stratford High Street comprising a mix of 2-32 storey buildings for a mix of retail, commercial, student accommodation, hotels and residential uses; and the 2-6 storey development along Kerrison Road / Cam Road to the west of the Site for hotel, residential and education uses. This is neither dominantly industrial or non-urban in character.</p>	<p>Newham Characterisation Study (2023) has been supplemented with a Tall Building Annex (2024). The document summarizes the sieving exercise that has been undertaken to identify locations where tall buildings may be an appropriate form of development and expands on the townscape assessment for each area of the borough. Further analysis has concluded that this site falls in an urban neighbourhood rather than in area of transition to an urban neighbourhood.</p>
-------------	-------------------------------	-----------------	--------	-------------------	---	--	------------------------------	--	--	--

										<p>[Images attached - Figure 4 – Site Context Photos</p> <p>Taken from outside Site on Stratford High Street looking west / south west</p> <p>Taken from within the Site's car park looking north west</p> <p>Google Street View: Taken from outside the Site on Kerrison Road (adjacent to Channelsea Path) looking north.</p> <p>Taken from outside Site on Stratford High Street looking north</p> <p>Taken from outside Site to the South on Cam Road looking west down Channelsea Road</p> <p>Google Street View: Taken from outside Site on Stratford High Street (bridge over DLR line) looking south west</p> <p>Google Street View: Taken from outside Site on Burford Road Street looking north / north west</p> <p>Google Street View: Taken from outside Site on Stratford High Street looking south.]</p>	
--	--	--	--	--	--	--	--	--	--	--	--

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference	
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as Newham Characterisation Study (2023) has identified the overarching character of the area and there will always be some exceptions to it. While, further analysis has concluded that this site falls in an urban neighbourhood rather than in area of transition to an urban neighbourhood, this has not changed the conclusion regarding appropriate heights in this location. The proposed prevailing heights and the maximum permissible heights within TBZ18: Stratford High Street designation are considered in line with the prevailing heights of the immediate context and the emerging local plan’s aspiration to preserve the spatial hierarchy and a gradual transition to the surrounding context. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p> <p>However, this policy approach has now changed to ensure a consistent approach to referencing heights in Policy D4 and the Neighbourhood policies. Please see the new wording in Table 1: Tall Building Zones, TBZ18: Stratford High Street and N8.SA4 Stratford High Street Bingo Hall site allocation.</p>	<p>This is further reflected by the fact the Characterisation Study identifies the Site as not being within a sensitive context, and that the study states the area’s prevailing height is 21-32 m (c. 7-10 storeys) and the area is typified with “New developments characterised by mid- and high-density urban blocks often have a shoulder height between six and ten storeys. In these areas, buildings of 16+ storeys would read as tall”. This seems contradictory to the approach that has been taken on the prescribed building height limitations under the Local Plan and Site Allocation.</p>	<p>Evidence Base: Newham Characterisation Study: Maccrannor Levinton with New Practice, Avison Young and GHPA (2022)</p>		TBZ18: Stratford High Street		N8SA4: Stratford High Street Bingo Hall	D4 Tall buildings	Design	Reg18-E-100/023	Zirconia Stratford Unit Trust	Reg18-E-100

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference	
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as Newham Characterisation Study (2023) has identified the overarching character of the area and there will always be some exceptions to it. While, further analysis has concluded that this site falls in an urban neighbourhood rather than in area of transition to an urban neighbourhood, this has not changed the conclusion regarding appropriate heights in this location. The proposed prevailing heights and the maximum permissible heights within TBZ18: Stratford High Street designation are considered in line with the prevailing heights of the immediate context and the emerging local plan’s aspiration to preserve the spatial hierarchy and a gradual transition to the surrounding context.</p> <p>More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p> <p>However, this policy approach has now changed to ensure a consistent approach to referencing heights in Policy D4 and the Neighbourhood policies. Please see the new wording in Table 1: Tall Building Zones, TBZ18: Stratford High Street and N8.SA4 Stratford High Street Bingo Hall site allocation.</p>	<p>We therefore consider there is no justification from the Study to apply a maximum height limit within the Site allocation and Policy D4 with of 40m / 13 storeys when the Characterisation Study incorrectly identifies the Site as falling within an industrial transitional area outside an urban neighbourhood, and then contradictorily identifies it as not being in a sensitive location and that a building would need to be 16+ storeys to be read as tall in this context. As such, either this building height limit should be significantly increased, or the overly prescriptive maximum building heights be removed altogether unless a more informed Townscape / Skyline Study is carried out.</p>	<p>Evidence Base: Newham Characterisation Study: Maccrannor Levington with New Practice, Avison Young and GHPA (2022)</p>		TBZ18: Stratford High Street		N8SA4: Stratford High Street Bingo Hall	D4 Tall buildings	Design	Reg18-E-100/024	Zirconia Stratford Unit Trust	Reg18-E-100

Reg18-E-100	Zirconia Stratford Unit Trust	Reg18-E-100/025	Design	D4 Tall buildings	N8SA4: Stratford High Street Bingo Hall		TBZ18: Stratford High Street			<p>Policy D4 also states that “all tall buildings must be of a lower height than the existing tall buildings and consider the cumulative impact with existing tall buildings to avoid saturating the skyline” in the Stratford High Street tall building zone. This approach, again, is not justified or evidenced, with no clear argument for why a taller building would cause unacceptable townscape harm or impact. This position is further made unclear by the fact the northern side of Stratford High Street has been designated as a tall building zone with a 50m height limit (16 storeys), when the following tall buildings have already been permitted and found acceptable within this zone but significantly exceed it:</p> <ul style="list-style-type: none"> • Duncan House – 32 storeys • Aspire Point – 26 storeys • Athena Court – 27 storeys • Stratford Halo – 43 storeys • 302-312 High Street – 25 storeys <p>It is therefore recommended that the wording of policy D4 should allow for greater flexibility subject to detailed townscape assessment and quality design to be demonstrated at planning application stage.</p>	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”.</p> <p>Whilst we acknowledge that consents have been granted to sites in the immediate context of the N8.SA4 Stratford High Street Bingo Hall site allocation, and that they could benefit from planning consents under the current LLDC Local Plan, those decisions are informed by the adopted LLDC Local Plan. The draft emerging Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough wide spatial hierarchy, avoid the scattered composition of tall buildings developed in the past years around Stratford and create a gradual and sensitive transition to the surrounding context. In line with London Plan Policy D9, varying heights within Tall Building Zones allows to achieve the spatial hierarchy aspiration of the plan and transitioning heights to surrounding context and sensitive areas.</p> <p>Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to</p>
-------------	-------------------------------	-----------------	--------	-------------------	---	--	------------------------------	--	--	--	---

												identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).
--	--	--	--	--	--	--	--	--	--	--	--	--

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 Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).				2	N8SA4: Stratford High Street Bingo Hall	D4 Tall buildings	Design	Reg18-E-100/026	Zirconia Stratford Unit Trust	Reg18-E-100

Reg18-E-100	Zirconia Stratford Unit Trust	Reg18-E-100/027	Design	D4 Tall buildings	N8SA4: Stratford High Street Bingo Hall		TBZ18: Stratford High Street			<p>Table 2: Summary of Recommended Changes to Policy D4 and the Tall Building Zone for Stratford High Street</p> <ul style="list-style-type: none"> Existing Wording: 'TBZ18: Stratford High Street ...50m and 40m and 32m in the define areas. Prevailing heights between 21m and 32m, except at the lower scale edges of the tall building zone, where prevailing heights should be between 9m and 21m. Opportunity to include limited tall building elements of up to 50m, apart from in defined 32m and 40m areas. Tall elements in the 32m area and/or in close proximity to the conservation areas should be limited in number and will only be acceptable if their impact on the settings of the conservation area is minimized. Residential development with employment industrial floorspace. The employment and industrial floorspace should provide space for light industrial uses and business workspaces and complement the offer at Stratford Workshops on Burford Road...' Proposed Change: Should remove of prescriptive building height limits unless the Local Plan is informed by a robust townscape / skyline study. If prescriptive building height limits to be kept, these should be appropriately increased to better reflect the context of the surrounding area. For instance, it is considered areas identified in the 32m (circa 10 storeys) and 40m (circa 13 storeys) areas could accommodate greater height. This is particularly the case for Site Allocation S8.SA4, where early feasibility studies shows potential scale of 18+ as being appropriate. 	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these location. Supporting text of Policy D9 part B (2) clearly states "in these locations, determine the maximum height that could be acceptable". Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Based on the sieving exercise to identify tall building locations and maximum heights, the TBZ18: Stratford High Street is not considered appropriate to accommodate greater heights. Due to its emerging context, its Metropolitan Centre nature and its capacity for growth, the TBZ19: Stratford Central has been identified as the area of maximum capacity in the Borough, with opportunities for tall elements up to 100m. The proposed maximum permissible heights seek to preserve the spatial hierarchy aspiration of the plan and in TBZ18: Stratford High Street it is considered appropriate for a gradual transition from the higher cluster to the surrounding context. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>
-------------	-------------------------------	-----------------	--------	-------------------	---	--	------------------------------	--	--	---	---

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 Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).	Table 2: Summary of Recommended Changes to Policy D4 and the Tall Building Zone for Stratford High Street <ul style="list-style-type: none">Existing Wording: ‘TBZ18: Stratford High Street ‘...All tall buildings must be of a lower height than the existing tall buildings and consider the cumulative impact with existing tall buildings to avoid saturating the skyline...’Proposed Change: Change wording to: ‘...All tall buildings <u>should generally</u> must be of a lower height than the existing tallest buildings tall buildings and consider the cumulative impact with existing tall buildings to avoid saturating the skyline in the surrounding context unless it can be demonstrated in townscape, heritage, and environmental terms that it will not cause unacceptable amenity harm or over saturation of the skyline’		TBZ18: Stratford High Street		N8SA4: Stratford High Street Bingo Hall	D4 Tall buildings	Design	Reg18-E-100/028	Zirconia Stratford Unit Trust	Reg18-E-100

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”.</p> <p>Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>						D4 Tall buildings	Design	Reg18-E-100/053	Zirconia Stratford Unit Trust	Reg18-E-100
	<p>e. D5: Living Well at High Density - Would you keep, change or add something to this policy?</p> <p>Aims of the policy Supported.</p>						D5 Living well at high density	Design	Reg18-E-070/056	Aston Mansfield	Reg18-E-070

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This wording change has not been made. We did not consider this change to be appropriate as it is not consistent with Policy D4. However, the policy has changed to clarify the intention of the policy approach to create a consistent base, rather than consistent overall height. Please see the new wording in Policy D3.	<p><i>1. Applicants of major residential-led schemes at over 250 units/ha density should ensure that:</i></p> <p><i>c. a consistent, pedestrian-friendly prevailing building height is established in keeping with the scale of the street and heights of neighbouring buildings, while enabling small scale variety in the roofscape; and</i></p> <p>Object: Policy as currently worded could limit ability to make most efficient use of land. No definition is provided as to what constitutes ‘pedestrian friendly prevailing building height’ . No differentiation made within the policy between Tall building Zones (which are likely to be at a higher density) and the rest of the borough.</p> <p>Suggested change to wording</p> <p><i>c. Outside of Tall Building Zones a consistent, [delete: pedestrian-friendly] prevailing building height is established that minimises negative social and environmental impacts upon the surrounding public realm and neighbouring buildings [delete: in keeping with the scale of the street and heights of neighbouring buildings], while enabling small scale variety in the roofscape; and</i></p>		D5.1c			D5 Living well at high density	Design	Reg18-E-070/057	Aston Mansfield	Reg18-E-070

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. The policy approach was developed in response to available best practice and the recommendations of the Newham Characterisation Study (2022), as available at the time of drafting. Your comment has not resulted in a change. However, this policy has now been subsumed into Policy D3, with the principle of design oversight through DRP and/or Community design review retained in policy D1.						D5 Living well at high density	Design	Reg18-T-084/008	Business Owner	Reg18-T-084
	This policy approach has now changed to clarify that this policy provides additional design criteria for developments where the principle of high density development above 250units/ha is acceptable. This threshold has been identified following emerging research on how density impacts on quality of life and social inclusion, set out in the evidence base for the policy, and an assessment of major planning applications considered by the LPA over the last 5 years. The London Plan does not include the 350 units/ha threshold in policy, and it is intended to be an indication of how 'higher density' is to be interpreted, flexibly, in the London Plan policy context. This does not preclude boroughs developing their own standards for managing high density. Please note this policy has now been subsumed into policy D3, with the principle of design oversight through DRP and/or Community design review retained in policy D1. Please see the new wording in policy D3.				D5.1		D5 Living well at high density	Design	Reg18-E-096/010	L&Q	Reg18-E-096

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Support noted. However, this policy has now been subsumed into Policy D3, with the principle of design oversight through DRP and/or Community design review retained in policy D1.						D5 Living well at high density	Design	Reg18-E-052/093	London Legacy Development Corporation	Reg18-E-052
	This policy approach has now changed to clarify that this policy provides additional design criteria for developments where the principle of high density development above 250units/ha is acceptable. Further, the policy has now been subsumed into Policy D3, with the principle of design oversight through DRP and/or Community design review retained in policy D1. Please see the new wording in policy D3.						D5 Living well at high density	Design	Reg18-E-052/094	London Legacy Development Corporation	Reg18-E-052
	Comment noted.						D5 Living well at high density	Design	Reg18-T-002/044	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. However, this policy has now been subsumed into Policy D3, with the principle of design oversight through DRP and/or Community design review retained in policy D1.						D5 Living well at high density	Design	Reg18-T-057/012	Resident	Reg18-T-057

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This wording change has been made. However, this policy has now been subsumed into Policy D3, with the principle of design oversight through DRP and/or Community design review retained in policy D1. Please see the new wording in Policy D3.			D5.1c			D5 Living well at high density	Design	Reg18-E-136/086	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
	This wording change has not been made. We did not consider this change to be appropriate as the policy is in line with the recommendations of the Newham Characterisation Study (2022) which identified a need for developments to respond to and mitigate existing microclimate conditions, including air pollution and noise. However, the policy approach has changed to better define the positive outcomes sought, which is to create or maintain a comfortable micro-climate. The revised terminology is also better aligned with technical guidance related to calculating a comfortable and therefore positive local climate. Please see revised wording in policy D3.	Part d requires massing and landscaping to contribute to positive micro-climate at street level and within amenity spaces. The principle of this is supported however as currently drafted the requirement to achieve a 'positive' microclimate is onerous and should instead be revised to ensure that development does not result in detrimental impacts on the existing microclimate. The Berekeley Group proposed amendments to draft policy wording: d. massing <u>should ensure it does not have a detrimental impact on the microclimate</u> and landscaping <u>should ensure it contributes</u> to positive micro-climates at street level and within amenity spaces; and		D5.1d			D5 Living well at high density	Design	Reg18-E-136/087	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136
	Comment noted	f. D6: Shopfronts and Advertising - Would you keep, change or add something to this policy? No Comment					D6 Shopfronts and advertising	Design	Reg18-E-070/058	Aston Mansfield	Reg18-E-070
	Comment noted. No wording change has been made to this policy as a result of your comment, as it is sufficiently flexible to respond to a range of development types. However, the policy has changed in response to recommendations made by other consultees to provide further clarity to the policy. Please see the new wording in policy D5 (formerly D6).	[Change it] One size doesn't fit all					D6 Shopfronts and advertising	Design	Reg18-T-084/009	Business Owner	Reg18-T-084

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	The policy approach has now changed to clarify that the location of plant/louvers must also ensure that the permeability of the shopfront is protected in principle. The implementation section further clarifies that the preference is for the flue and plant to be located away from the public realm and neighbouring uses where it may cause amenity issues. This principle applies to cases where site constraints require plant and louvers to be located on the principal facade.	D6 – Shopfronts and advertising The principal of shopfront and advertising design within this policy is broadly accepted, however, section 1c states, “...minimises signage and clutter, including visual impact of security measures, and principally retains visual permeability through the ground floor shopfront;”. It is unclear the quantity of shopfront which cannot be obscured. The lack of information fails to take into account section 1f, “...integrates louvers and plant into the shopfront design so that it is easy to access and maintain.” To improve visual amenity, facilities such as plant is not located along an active frontage, yet the policy requires visual permeability. Therefore, this policy has too many barriers to design which cannot be met and should be rationalised to a case-by-case basis and evolving design of the Borough.		D6.1c			D6 Shopfronts and advertising	Design	Reg18-E-012/003	Lidl	Reg18-E-012
	Comment noted. No wording change has been made as the Local Plan already addresses these issues through policies D6 and HS6, which will apply to development as and when it comes forward. It is not possible to impose design standards retrospectively on existing buildings or recently approved developments being delivered.	[Please provide any comments and feedback on the *Section 2: Vision and Objectives*.] it is impossible to get clean and healthy food anywhere, 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					D6 Shopfronts and advertising	Design	Reg18-T-002/028	Resident	Reg18-T-002

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		shops, greasy fast food chicken shops and awful shops with nasty signage everywhere.									
	A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan already addresses these issues through policy D5 (formerly D6), which will apply to development as and when it comes forward. It is not possible to impose design standards retrospectively on existing buildings or to recently approved developments being delivered via the planning system. Advert and shopfront improvement schemes may be run by the Regeneration team and delivered via cooperation and cost sharing with landowners/occupiers; the standards may be promoted at that time as part of the regeneration strategy.	[Change it] Be much bolder. Lots of shops should be forced to change their signage.					D6 Shopfronts and advertising	Design	Reg18-T-002/045	Resident	Reg18-T-002

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-002	Resident	Reg18-T-002/046	Design	D6 Shopfronts and advertising					Consistency	[Change it] You need to force shops to comply with well designed guidelines for design which need to be coherent. Look at Hove, Leyton, Stoke Newington as examples of what you should be aiming for.	A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan already addresses these issues through policy D5 (formerly D6), which will apply to development as and when it comes forward. It is not possible to impose design standards retrospectively on existing buildings or to recently approved developments being delivered via the planning system. Advert and shopfront improvement schemes may be run by the Regeneration team and delivered via cooperation and cost sharing with landowners/occupiers; the standards may be promoted at that time as part of the regeneration strategy.
Reg18-T-057	Resident	Reg18-T-057/013	Design	D6 Shopfronts and advertising						[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.
Reg18-T-072	Resident	Reg18-T-072/004	Design	D6 Shopfronts and advertising					heritage	[Add to it] Please do not have garish, flashy new stuff that are not in -keeping with local conservation areas and heritage architecture.	This wording change has been made. Please see the new wording in Implementation section of policy D5 (formerly D6) on Shopfronts and advertising.
Reg18-T-072	Resident	Reg18-T-072/005	Design	D6 Shopfronts and advertising					heritage	[Add to it] The Stratford mall needs to be upgraded and cleaned up so that it is not like a bazaar with neon lights and bright art murals, these are not suitable for heritage areas with lovely heritage buildings and statues in the area. TQ	The Local Plan addresses these topics through the requirements of policy D5 (formerly D6), policy D2 with regards to public realm art, and policies D7 and D9 which protect heritage assets in the borough. However, it cannot deliver the change you have requested as the criteria cannot be applied retrospectively.

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 necessary as the Local Plan already addresses these issues through policy D5 (formerly D6), which will apply to development as and when it comes forward. It is not possible to impose design standards retrospectively on existing buildings or to recently approved developments being delivered via the planning system. Advert and shopfront improvement schemes may be run by the Regeneration team and delivered via cooperation and cost sharing with landowners/occupiers; the standards may be promoted at that time as part of the regeneration strategy.						D6 Shopfronts and advertising	Design	Reg18-T-098/007	Resident	Reg18-T-098
	Support noted						D6 Shopfronts and advertising	Design	Reg18-T-103/012	Resident	Reg18-T-103
	This wording change has been made. Please see the new wording in Implementation section of policy D5 (formerly D6) Shopfronts and advertising.				D6.2		D6 Shopfronts and advertising	Design	Reg18-E-092/018	Royal Docks	Reg18-E-092
	Support noted						D7 Neighbourliness	Design	Reg18-E-070/059	Aston Mansfield	Reg18-E-070

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. In planning terms, neighbourliness means ensuring different types of activities can take place next to each other without impacting on health and wellbeing of people, on safety and quality of amenity, or on the economic growth needs of specific employment clusters in the borough. No additions have been made. Please note this policy is now D6.						D7 Neighbourliness	Design	Reg18-T-084/010	Business Owner	Reg18-T-084
	Support noted					D7.2	D7 Neighbourliness	Design	Reg18-E-065/017	DB Cargo (UK) Ltd	Reg18-E-065
	Comment noted. The approach to this policy has now changes to better reflect the need for applicants to take account of the potential worst case scenario in terms of the operation and amenity impacts of existing lawful uses. Please see revised wording in policy D6 (formerly D7).					D7.2	D7 Neighbourliness	Design	Reg18-E-065/019	DB Cargo (UK) Ltd	Reg18-E-065

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		Principle in the NPPF and Adopted London Plan.									
Support noted. Please note this policy is now D6.	We support Policy D7 and are pleased to see that the management of both negative and positive environmental impacts is a requirement for achieving good neighbourliness from the outset.						D7 Neighbourliness	Design	Reg18-E-145/082	Environment Agency	Reg18-E-145
Support noted. Please note this policy is now D6.	We are also pleased to see Policy D7.2. advocates Agents of Change, and recommend that the significance of this approach in the context of regulated industry activities and operations is noted in the implementation section for D7.2.	D7.2			D7.2		D7 Neighbourliness	Design	Reg18-E-145/083	Environment Agency	Reg18-E-145
Support noted. Please note this policy is now D6.	In reference to implementation section D7.4, we welcome Table 2 – Environmental standards and guidance, and the mention of environmental permitting in the context of managing noise, odour and dust pollution.	D7.4					D7 Neighbourliness	Design	Reg18-E-145/084	Environment Agency	Reg18-E-145

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Support noted	Neighbourliness We are supportive of the principles of Policy D7: Neighbourliness where they align with the Agent of Change principle set out in the London Plan (Policy D13). We are particularly supportive of Policy D7 affirming that “change brought about by development must not cause problems for existing lawful neighbours, otherwise known as an ‘Agent of Change’ approach.” Where GLP look to redevelop the Site, significant consideration will be given to the area’s surrounding uses to ensure the development does not cause adverse amenity impacts. In line with Policy D7, the proposed development will include provisions to create a safer and more secure environment by reducing the likelihood of antisocial behaviour, promoting public safety, improving security and lessening the fear of crime.			D7.2		D7 Neighbourliness	Design	Reg18-E-114/013	GLP (International Business Park, Rick Roberts Way)	Reg18-E-114
	Support noted	We are supportive of the principles of Policy D7: Neighbourliness where they align with the Agent of Change principle set out in the London Plan (Policy D13).			D7.2		D7 Neighbourliness	Design	Reg18-E-114/021	GLP (International Business Park, Rick Roberts Way)	Reg18-E-114

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This wording change has not been made. We did not consider this change to be necessary as the policy criteria set within policies D1 and D7 are considered effective at addressing the design quality for a range of small scale developments, including extensions, while having due regards to each site's unique context and potential impacts. Each case is considered on its merits, and independent of existing similar builds in the vicinity. Please note a range of flexibilities are also provided to homeowners wishing to expand under permitted development rights rules, for which the legislation does not require application of policy.	D7.3					D7 Neighbourliness	Design	Reg18-D-001/168	Local Plan Drop-In	Reg18-D-001
	This wording change has been made. Please see the new wording in Implementation section of policy D2 Public Realm Net Gain.	D7.3/4					D7 Neighbourliness	Design	Reg18-E-011/008	Metropolitan Police Service - Designing Out Crime	Reg18-E-011
	This wording change has not been made. We did not consider this change to be necessary as these principles are already included in the guidance provided by the policy.	D7.3					D7 Neighbourliness	Design	Reg18-E-144/034	Natural England	Reg18-E-144

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Support noted	Policy D7: Neighbourliness Draft Policy D7 (Neighbourliness) expects new development to achieve good neighbourliness from the outset by avoiding negative and maximising positive social and environmental impacts of design on neighbours on and off the site. This policy is welcomed, particularly in the context of Bow Goods Yard which sits within a wider mixed-use area where different uses need to co-exist. Part 2 of the policy which considers 'Agent of Change' is strongly supported to ensure that new development does not cause problems for existing uses that neighbour it.					D7 Neighbourliness	Design	Reg18-E-019/007	Network Rail - Bow Goods Yard	Reg18-E-019
	This wording change has not been made. We did not consider this change to be necessary as all safeguarded wharves are on designated employment land, and there are specific references in the Implementation section of the policy already. please note this policy is now D6.	Whilst it is welcomed that this policy specifically highlights the Agent of Change Principle, introduced in paragraph 187 of the National Planning Policy Framework (NPPF) (2021) and policy D13 (Agent of Change) of the London Plan, it is considered that there must be a specific reference in section 1b of the policy to the boroughs safeguarded wharves including on the vital need for development proposals located in close proximity to these sites to be designed to minimise the potential for conflicts of use and disturbance		D7.1b			D7 Neighbourliness	Design	Reg18-E-033/009	Port of London Authority	Reg18-E-033

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-033	Port of London Authority	Reg18-E-033/010	Design	D7 Neighbourli ness			D7.5			Support the proposal highlighted in part 5 of policy D7 that a Management Plan should be submitted where mechanical solutions are proposed to mitigate identified amenity impacts of intended use, which should also set out how the equipment will be maintained to avoid breakdown. This is particularly important in the context of development located in close proximity to a safeguarded wharf, including for developments located opposite the safeguarded wharves located in the Royal Borough of Greenwich (Angerstein, Murphy's and Riverside wharves).	Support noted. The policy approach has been amended to clarify that the management plan (now named Maintenance Plan) is required also where the mechanical solutions are needed in order to mitigate the impact of the site's constraints on the development. Please note this policy is now D6.
Reg18-E-033	Port of London Authority	Reg18-E-033/011	Design	D7 Neighbourli ness			D7.5			In addition support the text included in section D7.5 which sets out that the Management Plan will be secured through condition and/or planning obligations.	Support noted. Please note this policy is now D6.
Reg18-E-033	Port of London Authority	Reg18-E-033/012	Design	D7 Neighbourli ness			D7.5			Welcome reference in section D7.2 of the supporting text which highlights the importance of consulting with existing operators and/or occupiers to ensure that new development is deliverable and that the two uses are able to operate alongside each other, as well as other relevant authorities, including the PLA when appropriate.	Support noted. Please note this policy is now D6.
Reg18-E-033	Port of London Authority	Reg18-E-033/013	Design	D7 Neighbourli ness					D7.4	Support the references in table 2 (Environmental standards and guidance) to British Standards BS 8233 and BS 4142 with regard to noise as part of the	Support noted. Please note this policy is now D6.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		various standards that need to be complied with by prospective applicants									
	The Local Plan addresses this topic through the Agent of Change principle of policy D6 (formerly D7). However, it cannot deliver the change you have requested, as the planning system can only assess the development itself and ensure its design and construction limits and mitigates its own impact on, or from, neighbouring uses. Separate to the planning system, the rights to light process exists which may provide compensation in limited circumstances: https://www.gov.uk/government/publications/rights-to-light	D7.3					D7 Neighbourliness	Design	Reg18-E-083/008	Resident	Reg18-E-083
	The Local Plan addresses this topic in relation to the built environment through the guidance set in policy D6 Neighbourliness. However, it cannot deliver the change you have requested. The Council take all reports of noise and antisocial behaviour seriously and will take appropriate steps to abate reported nuisances. Our colleagues in Community Safety Enforcement department are able to help. We have also provided them with your comments.				D7.3a		D7 Neighbourliness	Design	Reg18-T-002/047	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.						D7 Neighbourliness	Design	Reg18-T-057/014	Resident	Reg18-T-057

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	The Local Plan addresses this topic through noise pollution mitigation standards, which are imbedded into policy D7. 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. Our colleagues in Community Safety Enforcement department are able to help. We have also provided them with your comments.	[Add to it] [Again Newham is overcrowded and suffering from] noise pollution [...]	D7.3b /h				D7 Neighbourliness	Design	Reg18-T-109/028	Resident	Reg18-T-109

Reg18-T-109	Resident	Reg18-T-109/029	Design	D7 Neighbourliness					D7.3a	<p>[Add to it] [Again Newham is overcrowded and suffering from noise pollution, overcrowding] and ASB as well as flytipping and crime.</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, D6, 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). 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. 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. 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</p>
-------------	----------	-----------------	--------	--------------------	--	--	--	--	-------	--	--

											to help. We have also provided them with your comments.
Reg18-E-116	SEGRO Plc	Reg18-E-116/020	Design	D7 Neighbourliness			2			e. Draft Policy D7 (Neighbourliness) <u>SEGRO supports the 'Agent of Change' approach set out in part (2) of draft Policy D7.</u>	Support noted

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
							D7 Neighbourliness	Design	Reg18-E-116/021	SEGRO Plc	Reg18-E-116
	This wording change has been made. Please see the new wording in Policy D6 (formerly D7) Neighbourliness and its implementation section.					1.b					
							D7 Neighbourliness	Design	Reg18-E-118/013	Sport England	Reg18-E-118
	This wording change has not been made as we did not consider this to be necessary as the implementation section of policy D6 (formerly D7) already includes reference to sporting venues in relation to the application of agent of change approach.					D7.1					
		D7.2					D7 Neighbourliness	Design	Reg18-E-118/014	Sport England	Reg18-E-118
	Comment noted. Policy D6 (formerly D7) implementation section refers to the need to also consider the amenity impacts of sporting facilities when addressing the agent of change principle.										

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		D7.2					D7 Neighbourliness	Design	Reg18-E-128/008	Tate & Lyle Sugars	Reg18-E-128
							D7 Neighbourliness	Design	Reg18-E-128/036	Tate & Lyle Sugars	Reg18-E-128

Reg18-E-128	Tate & Lyle Sugars	Reg18-E-128/037	Design	D7 Neighbourliness					D7.2	<p>TLS would suggest that, at least when it comes to SILs, Agent of Change principles should be assessed against a reasonable worst case scenario. TLS have direct experience of applicants carrying out noise testing at times when the factories were not operating (such as bank holidays), for insufficient periods of times (such as a single 24 hour period) and/or ignoring critical information provided (such as monitoring should take place when a ship is unloading on the jetty). Further to this, as a long term freehold owner of a large industrial site TLS is aware how operations can wax and wane over the long term and similarly industrial tenants can come and go. For example in the last 10 years TLS has not operated the refinery at its historical norm of 24/7, instead operating it 24/5. However due to changes in the sugar market, TLS have just decided to move back to 24/7 operations. Similarly, at least once in the last 10 years and in two different locations (including next to Connaught Riverside) we have had to store hundreds of thousands of tonnes of raw sugar outside for months on end – with the associated 24/5 heavy vehicle movements and risk of sugar dust escape. TLS currently lease some land and buildings out on the Western side of the Thameside East SIL (part of the Thameside Industrial Estate). Over the past 5 years it has been used for outside sugar storage, sugar warehousing, as a yard leased to plant hire company which subsequently left, the refinery waste storage area and the refinery security Headquarters. Most of the area is currently leased to a specialist affordable</p>	<p>This wording change has been made. Please see the new wording in Implementation section of Policy D6 (formerly D7) Neighbourliness.</p>
-------------	--------------------	-----------------	--------	--------------------	--	--	--	--	------	--	--

										<p>workspace provider focused on modern light industrial and creative tenants. It also houses (and has done for 20 years) a 'wholesale' foodbank who use the warehousing to store and distribute thousands of meals to those in food poverty in Newham each month. The range of uses over recent years has been extensive and varied and included brief periods of partial vacancy. It provides a clear example of why snapshot assessments of Agent of Change whether dust, noise, odour or something else are not necessarily appropriate if a core policy aim is "BFN1 3.a protecting and intensifying the borough's Strategic Industrial Locations and Local Industrial Locations for a diverse range of industrial and storage, logistics and distribution and related uses." While TLS appreciate that Agent of Change principles are not intended to create unfettered rights for nuisance causing activities to proliferate, we do believe it is essential to demand applicants look at realistic worst case uses for SIL, rather than just the immediate current use, if LBN is serious in its intention to protect and intensify SIL. TLS would suggest the following text is added to the paragraph D.7.2 (p75)</p> <p><u>When considering a new development adjacent to or in close proximity to a SIL, Agent of Change principles will be assessed against a reasonable worst case scenario on SIL Land. Specifically tests for noise, dust, odour and fumes in table 2 would assess against a reasonable worst case land use on SIL.</u> TLS believe this is essential from our own experience if the long term viability of SIL is to be protected, particularly when (part of) a</p>	
--	--	--	--	--	--	--	--	--	--	--	--

										<p>SIL site may be temporarily vacant or undergoing refurbishment. For further policy support TLS would draw attention to policy E5 of the London Plan <i>D Development proposals within or adjacent to SILs should not compromise the integrity or effectiveness of these locations in accommodating industrial type activities and their ability to operate on a 24-hour basis. Residential development adjacent to SILs should be designed to ensure that existing or potential industrial activities in SIL are not compromised or curtailed</i></p>	
Reg18-E-070	Aston Mansfield	Reg18-E-070/060	Design	D8 Conservation Areas and ATVs						<p>h. D8: Conservation Areas and Areas of Townscape Value - Would you keep, change or add something to this policy? No comment.</p>	Comment noted

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. No additions have been made. Conservation Areas are designated by the Council in line with related legislation and through engagement with local residents and businesses. Areas of Townscape Value are designations made through the Local Plan process, based on available evidence, and represent local non-designated heritage assets. We are always keen to know which buildings/structures people appreciate in their neighbourhood. If you have a building in mind and would like to put it forward to be considered for Newham's Local List, please email us at localplan@heaham.gov.uk .	[Change it] Who decides what to keep					D8 Conservation Areas and ATVs	Design	Reg18-T-084/011	Business Owner	Reg18-T-084

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	The policy implementation text has now changed to require a Heritage Impact Assessment, and in the case of tall buildings also a Townscape Visual Impact Assessment, to justify the design solution and help mitigate any impacts on the significance of heritage assets or their setting. This is aligned with the revised approach in policy D4 (Tall buildings). Please see the new wording in implementation section of policy D7 (formerly D8).	As the draft Plan makes clear at paragraph 3.42, there is a relative scarcity of identified heritage assets across the borough in comparison to other London boroughs. It is therefore important that the significance of these assets, together with wider historic townscape and character, are given adequate protection given the development pressure that is prevalent in Newham. In this context, we consider that there are a number of areas where the draft Plan could be further strengthened and indeed take advantage of potential opportunities offered by the historic environment for sustainable growth. These issues are overlapping in a number of ways, but are dealt with in relation to their core elements below. In summary, we consider that taken together these issues create a degree of ambiguity within the draft Plan in relation to development that could potentially affect heritage assets and their significance. We consider that addressing these successfully would eliminate any potential for these issues to undermine the overall aim of the draft Plan to conserve the historic environment while also allowing for the provision of a positive strategy as per the NPPF.	3.42				D8 Conservation Areas and ATVs	Design	Reg18-E-147/004	Historic England	Reg18-E-147

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-097	Lee Valley Regional Park Authority	Reg18-E-097/022	Design	D8 Conservation Areas and ATVs			D8.3			<p>Heritage and Conservation Areas The Authority supports policy on protecting Conservation Areas and their heritage assets set out under Policy D8 in particular the importance of protecting views to key landmarks such as the Grade 1 listed House Mill and the landscape within which these areas are set.</p> <p>The Park Development Framework Area 1 Proposals seek the conservation and interpretation of historical features of interest within the landscape and associated with the waterways. A minor addition to Policy D8 'Conservation Areas and Areas of Townscape Value' bullet point 3 is therefore proposed to ensure it includes as a characteristic of Conservation Areas <i>"the value of promoting the important industrial archaeology associated with the waterways along the Leaway south of Three Mills"</i>.</p>	This wording change has not been made. We did not consider this change to be necessary as the waterways you refer to are already within Newham's Archaeological Priority Area designations and will be considered as part of policy D8 (formerly D9).
Reg18-T-002	Resident	Reg18-T-002/048	Design	D8 Conservation Areas and ATVs						[Keep it]	Support noted.
Reg18-T-057	Resident	Reg18-T-057/015	Design	D8 Conservation Areas and ATVs						[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-072	Resident	Reg18-T-072/007	Design	D8 Conservation Areas and ATVs						[Add to it] Please respect heritage architecture and buildings, do not add too many modern annexes or inappropriate activities like bazaars or fastfood outlets that destroy the character of the local heritage areas.	This wording change has not been made. We did not consider this change to be appropriate there is no evidence to support exclusion of certain uses or architectural typologies in relation to heritage assets. All proposals are assets on their merits in light of their respective impact on the significance of heritage assets.
Reg18-T-098	Resident	Reg18-T-098/009	Design	D8 Conservation Areas and ATVs						[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.
Reg18-E-070	Aston Mansfield	Reg18-E-070/061	Design	D9 APAs			D9.1			i. D9: Archaeological Priority Areas - Would you keep, change or add something to this policy? Lady Trower Playing Fields is located within a Tier 1 Archaeological Priority Area. Policy is supported. Requirements for Desk Based Assessment in line with paragraph 194 of the NPPF.	Support noted
Reg18-T-084	Business Owner	Reg18-T-084/012	Design	D9 APAs						[Change it] Since when did Newham have archaeology	Comment noted. Newham has a long history of human settlements and activity, not least through the rich archaeological deposits in riverbeds. Please see the Archaeological Priority Areas Evidence Base (2015) (PDF) document published on the Council's planning policy webpages, here: https://www.newham.gov.uk/planning-development-conservation/planning-policy-local-plan/7

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-147	Historic England	Reg18-E-147/023	Design	D9 APAs				3.45		Policy D9 Archaeological Priority Areas, para 3.45. Should be Historic England rather than English Heritage. The current Archaeological Priority Areas date from 2014 – we would suggest that the Council may wish to commission an update to them to reflect recent fieldwork which would helpfully refine both spatial extent and significance.	Comment noted. Following further engagement with GLAAS, wording change has been made to indicate that the council will seek to commission this work during the lifetime of the Plan. Please see the new wording in Policy D8 (formerly D9): Archaeological Priority Areas
Reg18-E-084	London Historic Parks and Gardens Trust	Reg18-E-084/010	Design	D9 APAs						Policy D9: Archaeological Priority Areas We welcome the content of policy D9 and are re-assured to see that the designation of Archaeological Priority Areas is being afforded due consideration in the local plan.	Support noted.
Reg18-T-002	Resident	Reg18-T-002/049	Design	D9 APAs						[Keep it]	Support noted.
Reg18-T-057	Resident	Reg18-T-057/016	Design	D9 APAs						[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.
Reg18-T-074	Resident	Reg18-T-074/007	Homes	H4 Housing mix						[Keep it] My front door is very open to anyone can come and stand there lot of blind spot	Support noted. Policies D1 and H11 work together to promote high quality of new homes, or homes being extended or renovated in a way that requires planning permission. As part of this, the quality of the defensible space, between the public realm and the home front door and windows, is also addressed.

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-034/021	Resident	Reg18-T-034
	London Plan (2021) Policy D9 sets out a comprehensive list of criteria for tall buildings to meet, including environmental impacts. The impact of tall buildings has been taken into consideration and addressed in the Policy D4.3 which requires microclimate considerations, including wind and air quality assessments. To stress the importance of wind assessments in high streets and town centres, a wording change has been made. Please see the new wording in D4.3.	D4.3				D4					
							HS6 Health and Wellbeing on High Street	High Street	Reg18-T-034/022	Resident	Reg18-T-034
	London Plan (2021) Policy D9 sets out a comprehensive list of criteria for tall buildings to meet, including environmental impacts. The impact of tall buildings has been taken into consideration and addressed in the Policy D4.3 which requires microclimate considerations, including wind and air quality assessments. To stress the importance of wind assessments in high streets and town centres, a wording change has been made. Please see the new wording in D4.3.	D4.3				D4					
	[Add to it] Limit tall buildings on high streets and town centres as they make walking and cycling unpleasant [Originally submitted in response to H1]										
	[Add to it] Limit tall buildings on high streets and town centres as [they make walking and cycling unpleasant and] wind effects can be dangerous for less able people. [Originally submitted in response to H1]										

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as, based on the sieving exercise undertaken to identify suitable locations for tall buildings across the borough and, due to its location in proximity to a low rise context and outside of a town centre designation, the site is not considered suitable to accommodate tall buildings development.</p> <p>More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p> <p>Furthermore, its Local Mixed Use Area designation for employment-led mixed use seeks to protect existing light industrial and community uses as well as its function as buffer between the Butchers Road LIL and residential and green space.</p>			LMUA14: Beeby Road		New site	J1 Employment and growth	Inclusive Economy	Reg18-E-112/053	Millenium Group	Reg18-E-112

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference	
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as, based on the sieving exercise undertaken to identify suitable locations for tall buildings across the borough and, due to its location in proximity to a low rise context and outside of a town centre designation, the site is not considered suitable to accommodate tall buildings development.</p> <p>More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p> <p>Furthermore, its Local Mixed Use Area designation for employment-led mixed use seeks to protect existing light industrial and community uses as well as its function as buffer between the Butchers Road LIL and residential and green space.</p>					LMUA14: Beeby Road		J1 Employment and growth	Inclusive Economy	Reg18-E-112/056	Millenium Group	Reg18-E-112
	<p>The supporting Proposed Site Plan [199-203 Freemasons Road, Canning Town E16 3PY] is an indicative drawing that shows a potential option for the Council. In detail, a tall building fronting the A13 is a logical approach to providing more residential accommodation and creating a buffer between the A13 and the rest of the site to the south. The tallest building in the immediate vicinity is East City Point, which rises to 10 storeys. It too proposes the greatest height along the A13. It is considered that height of 10-12 storeys is justified in that location due to the provision of a primary school and an energy centre. The detail of the building height should be design led and can be discussed by the Council upon initial site allocation.</p> <p>[Originally submitted in response to J1]</p>											

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed to reflect uncertain project timeframes and the desire to enable early sustainable development. Policy wording to support suitably scaled and located deadweight development to enable development have now been included. In agreement with Transport for London, it is considered that the most sustainable location for this early phased development is the part of the site within easy walking distance of Gallions Reach DLR station. Transformation of the rest of the site remains contingent on delivery of the new DLR station and route or similarly transformative (as confirmed by Transport for London public transport intervention). Please see the new wording in TBZ5: Gallions Reach and N17.SA1 Beckton Riverside Development Principles. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).			Design Principles		N1.SA1 Beckton Riverside	N1 Gallions Reach	Neighbourhoods	Reg18-K-001/043	Abrdn	Reg18-K-001

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed to reflect uncertain project timeframes and the desire to enable early sustainable development. Policy wording to support suitably scaled and located deadweight development to enable development have now been included. In agreement with Transport for London, it is considered that the most sustainable location for this early phased development is the part of the site within easy walking distance of Gallions Reach DLR station. Transformation of the rest of the site remains contingent on delivery of the new DLR station and route or similarly transformative (as confirmed by Transport for London public transport intervention). Please see the new wording in TBZ5: Gallions Reach and N17.SA1 Beckton Riverside Development Principles.	Regardless of the above, Abrdn consider that building heights of just 3 to 6 storeys in the scenario where no funding is secured for a new DLR station would be unviable for any development to come forward. It would also be an entirely inappropriate response as it would result in inefficient low-density use of land – precisely the type of development that was brought forward in parts of the Docks under the LDDC which has now had to be redeveloped. This is an unsustainable approach, contrary to national policy. The quantum and scale of development should be subject to appropriate masterplan feasibility and testing. [Originally submitted in response to Neighbourhoods]		Design Principles		N1.SA1 Beckton Riverside	N1 Gallions Reach	Neighbourhoods	Reg18-K-001/044	Abrdn	Reg18-K-001

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	The Plan notes that building heights are dependent on securing DLR funding, with heights at the Site rising to 10 storeys with no funding secured and 13 storeys with funding. The Site [Armada 2] already sits in closer proximity to Gallions Reach DLR (4-minute walk) than where a new station would be constructed (c.15-minute walk). The Site is the most accessible location across N1.SA1. Therefore, determining heights at the Site dependent on DLR funding that will not directly benefit the Site feels illogical. Heights should only be maximised in this location as development is not dependent on DLR investment. The Site should therefore be seen as Deadweight Development that can take place regardless of the DLR investment under consideration. [Originally submitted in response to Neighbourhoods]			Design principles		N1.SA1 Beckton Riverside	N1 Gallions Reach	Neighbourhoods	Reg18-E-092/040	Royal Docks	Reg18-E-092
	It is also noted that the Site's maximum-built height is based on both meters and storeys. This presents a confusing position. Clarification is needed as to which of the greater is allowable, preferably with one metric used only. [Originally submitted in response to Neighbourhoods]			Design principles		N1.SA1 Beckton Riverside	N1 Gallions Reach	Neighbourhoods	Reg18-E-092/042	Royal Docks	Reg18-E-092

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted.			1			N1 Gallions Reach	Neighbourhoods	Reg18-E-136/188	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136
	This policy approach has now changed to reflect the desire to enable early sustainable development before the delivery of the new DLR with permissible heights that aligns with the wider context. Please see new wording in TBZ5: Gallions Reach and N17.SA1 Beckton Riverside Development Principles. However, the change you have suggested has not been made. We did not consider this change to be appropriate as, based on the sieving exercise to identify tall building locations and maximum heights, and due to its location in an area with limited accessibility to public transport, TBZ5: Gallions Reach is not considered an appropriate location to accommodate greater heights. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).					N1.SA1 Beckton Riverside	N1 Gallions Reach	Neighbourhoods	Reg18-E-136/189	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136
	A change to this policy approach has not been made. We did not consider this change to be necessary because the Tall Building Zone designations are referenced in the Neighbourhood Policy where necessary and					N1.SA1 Beckton Riverside	N1 Gallions Reach	Neighbourhoods	Reg18-E-136/223	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136
	Explicit reference should be made to the fact the Site is located within the Gallions Reach Tall Building Zone (TBZ5 as outlined in Policy D4). Proposed policy wording change: <u>Tall buildings should be delivered in line with the building heights</u>										

Comment Response		the maximum height - expressed in meters – in each site allocations aligns with Policy D4.
Comment	outlined within Policy D4 and the <u>guidance for Tall Building Zone 5: Gallions Reach</u> . [Originally submitted in response to Neighbourhoods]	The building heights should be revised to align themselves with the guidance within Policy D4 on Tall Building Zone 5 Gallions Reach, which outlines maximum heights in metres rather than storeys. [Originally submitted in response to Neighbourhoods]
Implementation		
Justification		
Clause		Design principles
Introduction		
Site allocation		N1.SA1 Beckton Riverside
Policy		N1 Gallions Reach
Chapter		Neighbourhoods
Comment Reference		Reg18-E-136/224
Representor		St William Homes LLP and Berkeley South East London Limited
Representation Reference		Reg18-E-136

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to reflect the desire to enable early sustainable development before the delivery of the new DLR with permissible height that aligns with the wider context. In agreement with Transport for London, it is considered that the most sustainable location for this early phased development is the part of the site within easy walking distance of Gallions Reach DLR station. Transformation of the rest of the site remains contingent on delivery of the new DLR station and route or similarly transformative (as confirmed by Transport for London public transport intervention).</p> <p>Furthermore, this policy approach has now changed to ensure a consistent approach to referencing heights in Policy D4 and the Neighbourhood policies.</p> <p>Please see the new wording in TBZ5: Gallions Reach and N17.SA1 Beckton Riverside Development Principles.</p>			Design principles		N1.SA1 Beckton Riverside	N1 Gallions Reach	Neighbourhoods	Reg18-E-136/225	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
	This policy approach has now changed to reflect uncertain project timeframes and the desire to enable early sustainable development. Policy wording to support suitably scaled and located deadweight development to enable development have now been included. In agreement with Transport for London, it is considered that the most sustainable location for this early phased development is the part of the site within easy walking distance of Gallions Reach DLR station. Transformation of the rest of the site remains contingent on delivery of the new DLR station and route or similarly transformative (as confirmed by Transport for London public transport intervention). Suitable heights for each development phase are still included within the policy, in line with London Plan Policy D4. Please see the new wording in TBZ5: Gallions Reach and N17.SA1 Beckton Riverside Development Principles.	As currently drafted these proposed heights assume a 'with DLR scenario'. However, St William's comments on Policy D4 also seek to remove the 'with' and 'without' DLR scenario and seeks these heights in all development scenarios as long as they follow a design led approach in line with Policy D3 of the London Plan. Proposed policy wording: Where no funding is secured for a new DLR station, development should meet the following principles: Where funding is secured for a new DLR station, development should meet the following principles: - In the south of the site building height should generally be between 3 to 8 storeys, rising up to 12 storeys in the areas closest to Gallions Reach DLR station. - In the north of the site building heights should generally be between 6 and 8 storeys, rising to between 13 and 16 storeys at the new Town Centre and DLR station. [Originally submitted in response to Neighbourhoods]		Design principles		N1.SA1 Beckton Riverside	N1 Gallions Reach	Neighbourhoods	Reg18-E-136/226	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
	<p>This policy approach has now changed to reflect the desire to enable early sustainable development before the delivery of the new DLR with permissible heights that aligns with the wider context. Please see new wording in TBZ5: Gallions Reach and N17.SA1 Beckton Riverside Development Principles. However, the change you have suggested has not been made. We did not consider this change to be appropriate as, based on the sieving exercise to identify tall building locations and maximum heights, and due to its location in an area with limited accessibility to public transport, TBZ5: Gallions Reach is not considered an appropriate location to accommodate greater heights. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>	<p>St William also requests that greater maximum heights are designated given the Site's location within an opportunity area, alongside the river and on the basis the Site is not located in a particularly sensitive area i.e. adjoining industrial uses and no heritage assets. The maximum height sought is therefore 80 metres with the greatest height located in the areas closest to the Major Town Centre, the Gallions Reach DLR station and any future DLR station or other transformative transport station or interchange; adjacent to existing industrial uses and riverside locations'.</p> <p>[Originally submitted in response to Neighbourhoods]</p>		Design principles		N1.SA1 Beckton Riverside	N1 Gallions Reach	Neighbourhoods	Reg18-E-136/227	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
	Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. In line with London Plan Policy D9, Policy D4.2 identifies Tall Building Zones designations and the maximum height for each zone. The varying heights across Tall Building Zones allow for heights to transition to the surrounding context and sensitive areas. Locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).			4		N11.SA1 East Beckton Town Centre	N11 Beckton	Neighbourhoods	Reg18-Ab-001/008	Beckton and Royal Docks Assembly	Reg18-Ab-001

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. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Due to its District Centre designation, in a transform area with a high level of accessibility, TBZ4: Beckton it is considered suitable to accommodate tall building developments, albeit at the lowest permitted tall building heights in the borough, with opportunities for tall elements up to 32m and 40m. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).			Design principles		N11.SA1 East Beckton Town Centre	N11 Beckton	Neighbourhoods	Reg18-Ab-001/014	Beckton and Royal Docks Assembly	Reg18-Ab-001

Reg18-Ab-001	Beckton and Royal Docks Assembly	Reg18-Ab-001/069	Neighbourhoods	N11 Beckton			4			<p>[Add] Would like limits on tall buildings - preferably 4 stories maximum [Originally submitted in response to Neighbourhoods]</p>	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Policy D9 part A requires boroughs to identify in their development plan what is considered a tall building for their specific localities but it states that tall building "should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey."</p> <p>In accordance with Policy D9 part A, and based on local context analysis, Newham has defined 21m (ca. 7 storeys) as the height at which buildings become substantially taller than its surrounding.</p> <p>Suitable locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Due to its District Centre designation, in a transform area with a high level of accessibility, TBZ4: Beckton is considered suitable to accommodate tall building developments, albeit at the lowest permitted tall building heights in the borough, with opportunities for tall elements up to 32m and 40m.</p> <p>Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>
--------------	----------------------------------	------------------	----------------	-------------	--	--	---	--	--	--	---

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 necessary because the Tall Building Zone designations are referenced in the Neighbourhood Policy where necessary and the maximum heights - expressed in meters – in each site allocations aligns with Policy D4.			4			N11 Beckton	Neighbourhoods	Reg18-Ab-001/070	Beckton and Royal Docks Assembly	Reg18-Ab-001
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need.</p> <p>Based on the sieving exercise undertaken to identify suitable locations for tall buildings across the borough and, due to its District Centre designation, in a transform area with a high level of accessibility, N11.SA1 East Beckton Town Centre site allocation is considered suitable to accommodate tall building developments at the minimum capacity in the Borough, with opportunities for tall elements up to 32m and 40m. However, Policy CE1 covers the requirement for investigation of land contamination prior development.</p> <p>More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>			4			N11 Beckton	Neighbourhoods	Reg18-Ab-001/082	Beckton and Royal Docks Assembly	Reg18-Ab-001

Comment Response	
Comment	
Implementation	
Justification	
Clause	
Introduction	
Site allocation	
Policy	
Chapter	
Comment Reference	
Representor	
Representation Reference	
Reg18-E-109	LAMIT c/ CCLA Investment Management Ltd
Reg18-E-109/004	Neighbourhoods
N11 Beckton	New site
	Design principles
	2. Support ‘D4: TBZ4 Beckton Tall building zone’ and promote the extension of the 40m zone to include the south-western corner of Beckton Retail Park. [Originally submitted in response to Neighbourhoods]
This change has been made. Please see the new map in Policy D4.	

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	The design work carried out in 2018/2019 established that across the majority of the site articulated blocks between 4 and 10 storeys (c.32m) would be appropriate, however taller elements of between 12 and 15 storeys (c.46m) would be appropriate along the western boundary with Woolwich Manor Way, with a taller 15 to 18 storey (c.55m) cluster in the south-western corner of the site, adjacent to the Woolwich Manor Way/Windsor Terrace/Tollgate Road roundabout. [Originally submitted in response to Neighbourhoods]			Design principles		New site	N11 Beckton	Neighbourhoods	Reg18-E-109/012	LAMIT c/ CCLA Investment Management Ltd	Reg18-E-109
	This policy approach has now changed to ensure a consistent approach to referencing heights in Policy D4 and the Neighbourhood policies and to include N11.SA4 Alpine Way in TBZ4: Beckton. Please see the new wording in TBZ4: Beckton and N11.SA3 Alpine Way. The comment you have provided has not resulted in a change. We did not consider this change to be appropriate as, based on the sieving exercise to identify tall building locations and maximum heights, TBZ4: Beckton is not considered appropriate to accommodate greater heights. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).										
	[Appendix 2: N11.SA4 Beckton Retail Park illustrative allocation - table extract] <u>Design principles</u> Building heights should be between 4 and 11 storeys and be in accordance with the Tall Building Zone and Local Plan Policy D4. [Originally submitted in response to Neighbourhoods]			Design principles		New site	N11 Beckton	Neighbourhoods	Reg18-E-109/020d	LAMIT c/ CCLA Investment Management Ltd	Reg18-E-109
	This policy approach has now changed to extend the 40m zone within the TBZ4: Beckton to include part of the N11.SA4 Alpine Way. Furthermore, this policy approach has now changed to ensure a consistent approach to referencing heights in Policy D4 and the Neighbourhood policies. Please see the new wording in TBZ4: Beckton and N11.SA3 Alpine Way.										

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. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Due to its District Centre designation, in a transform area with a high level of accessibility, TBZ4: Beckton is considered suitable to accommodate tall building developments, albeit at the lowest permitted tall building heights in the borough, with opportunities for tall elements up to 32m and 40m. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).			Design principles		N11.SA1 East Beckton Town Centre	N11 Beckton	Neighbourhoods	Reg18-D-001/100	Local Plan Drop-In	Reg18-D-001

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need.</p> <p>Based on the sieving exercise undertaken to identify suitable locations for tall buildings across the borough and, due to its District Centre designation, in a transform area with a high level of accessibility, the N11.SA1 East Beckton Town Centre site allocation is considered suitable to accommodate tall building development. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p> <p>However, Policy CE1 requires investigation of land contamination prior development. In addition, building control regulations oversee the technical requirements to ensure any building design and engineering is suitable for the location and land conditions.</p>			Development principles		N11.SA1 East Beckton Town Centre	N11 Beckton	Neighbourhoods	Reg18-K-014/001	Resident	Reg18-K-014

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. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Due to its District Centre designation, in a transform area with a high level of accessibility, TBZ4: Beckton is considered suitable to accommodate tall building developments, albeit at the lowest permitted tall building heights in the borough, with opportunities for tall elements up to 32m and 40m. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).			4		N11.SA1 East Beckton Town Centre	N11 Beckton	Neighbourhoods	Reg18-K-043/003	Resident	Reg18-K-043

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. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. However, the new Local Plan does provide more guidance than the existing Local Plan on where tall buildings should be located, what heights they should be, and how they should be integrated with the surrounding context. This does give us a greater ability to influence and shape developments as they come forward. Locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Due to its Major Centre designation, in a transform area with a high level of accessibility, TBZ3: East Ham is considered suitable to accommodate tall building development. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).			4			N13 East Ham	Neighbourhoods	Reg18-Ae-001/082	East Ham Assembly	Reg18-Ae-001

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 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 chapter, 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.			Design principles		N13.SA2 East Ham Primark	N13 East Ham	Neighbourhoods	Reg18-Ae-001/085	East Ham Assembly	Reg18-Ae-001

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Due to its Major Centre designation, in a transform area with a high level of accessibility, TBZ3: East Ham is considered suitable to accommodate tall building development. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024). Alongside delivering homes, the Local Plan also secures funding and land for the delivery of new infrastructure including new parks, health centres and schools. More details about where these will be located is in policy BFN1 and the neighbourhoods chapter.</p>			4			N13 East Ham	Neighbourhoods	Reg18-Ae-001/095	East Ham Assembly	Reg18-Ae-001

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. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. However, the new Local Plan does provide more guidance than the existing Local Plan on where tall buildings should be located, what heights they should be, and how they should be integrated with the surrounding context. This does give us a greater ability to influence and shape developments as they come forward. Locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Due to its Major Centre designation, in a transform area with a high level of accessibility, TBZ3: East Ham is considered suitable to accommodate tall building development. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).			3			N13 East Ham	Neighbourhoods	Reg18-Ae-001/125	East Ham Assembly	Reg18-Ae-001

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Due to its Major Centre designation, in a transform area with a high level of accessibility, TBZ3: East Ham is considered suitable to accommodate tall building development. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024). The impact of tall buildings has been taken into consideration and addressed in the Policy D4.3 which requests microclimate consideration, including wind and air quality assessment.</p>			4			N13 East Ham	Neighbourhoods	Reg18-Ae-001/136	East Ham Assembly	Reg18-Ae-001

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. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Due to its Major Centre designation, in a transform area with a high level of accessibility, TBZ3: East Ham is considered suitable to accommodate tall building development. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).			4			N13 East Ham	Neighbourhoods	Reg18-Ae-001/153	East Ham Assembly	Reg18-Ae-001

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need.</p> <p>However, the new Local Plan does provide more guidance than the existing Local Plan on where tall buildings should be located, what heights they should be, and how they should be integrated with the surrounding context. This does give us a greater ability to influence and shape developments as they come forward. Furthermore, as highlighted in the Tall Building Annex (2023) the presence of tall buildings at much greater height than the surrounding context shouldn't be used as justification for the area being appropriate for tall buildings. Locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Due to its Major Centre designation, in a transform area with a high level of accessibility, TBZ3: East Ham is considered suitable to accommodate tall building developments. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the</p>			4			N13 East Ham	Neighbourhoods	Reg18-Ae-001/154	East Ham Assembly	Reg18-Ae-001

Comment Response	methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).
Comment	
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
	A change to this policy approach has not been made. We did not consider this change to be appropriate. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Due to its Major Centre designation, in a transform area with a high level of accessibility, TBZ3: East Ham is considered suitable to accommodate tall building development. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).			4			N13 East Ham	Neighbourhoods	Reg18-Ae-001/197	East Ham Assembly	Reg18-Ae-001
	A change to this policy approach has not been made. We did not consider this change to be necessary as the emerging Local Plan has identified N13.SA3 Former East Ham Gasworks as a suitable site for development. The site doesn't fall within a Tall Building Zone but a mid-rise development (below 21m) is considered suitable to make a contribution to meeting Newham's housing need whilst protecting the openness of the adjacent Metropolitan Open Land.			Design principles		N13.SA3 Former East Ham Gasworks	N13 East Ham	Neighbourhoods	Reg18-E-074/005	Resident	Reg18-E-074

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 necessary as the emerging Local Plan has identified N13.SA3 Former East Ham Gasworks as a suitable site for development. The site doesn't fall within a Tall Building Zone but a mid-rise development (below 21m) is considered suitable to make a contribution to meeting Newham's housing need whilst protecting the openness of the adjacent Metropolitan Open Land.					N13.SA3 Former East Ham Gasworks	N13 East Ham	Neighbourhoods	Reg18-E-083/007	Resident	Reg18-E-083
	A change to this policy approach has not been made. We did not consider this change to be necessary as the emerging Local Plan has identified N13.SA3 Former East Ham Gasworks as a suitable site for development. The site doesn't fall within a Tall Building zone but a mid-rise development (below 21m) it is considered suitable to make a contribution to meeting Newham's housing need whilst protecting the openness of the adjacent Metropolitan Open Land. The N13.SA3 Former East Ham Gasworks design principles provide more guidance on design aspects but any detail of the development proposal on the site will be assessed during the planning application process.					N13.SA3 Former East Ham Gasworks	N13 East Ham	Neighbourhoods	Reg18-E-086/006	Resident	Reg18-E-086

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as, based on the sieving exercise undertaken to identify suitable locations for tall buildings across the borough and, due to its sensitive location in proximity to a Site of Importance for Nature Conservation (SINC), low rise context and in an area with limited accessibility to public transport, N13.SA3 Former East Ham Gasworks site allocation it is not considered suitable to accommodate tall buildings developments.</p> <p>Furthermore, gasholders are metal structures rather than buildings, therefore their heights cannot be considered justifications for new tall buildings. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>			Design principles		N13.SA3 Former East Ham Gasworks	N13 East Ham	Neighbourhoods	Reg18-E-136/318	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
	<p>The vision for East Ham will be achieved by 15 criteria, some of which we comment on below. Moderate uplift in density will be supported where it enhances the character of the area, particularly in areas of mixed urban form. We consider that design led optimisation as required by the London Plan and local Policy D3 should be promoted. The scale and volume of the existing gas holder represents a tall building on previously developed land which informs the existing character and appearance of the area.</p> <p>[Originally submitted in response to Neighbourhoods]</p>			Design principles		N13.SA3 Former East Ham Gasworks	N13 East Ham	Neighbourhoods	Reg18-E-136/335	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
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as, based on the sieving exercise undertaken to identify suitable locations for tall buildings across the borough and, due to its sensitive location in proximity to a Site of Importance for Nature Conservation (SINC), low rise context and in an area with limited accessibility to public transport, N13.SA3 Former East Ham Gasworks site allocation is not considered suitable to accommodate tall buildings. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p> <p>However this policy wording has now changed to reflect comments on the development principles and design principles. Please see the new wording in N13.SA3 Former East Ham Gasworks site allocation.</p>			Design principles		N13.SA3 Former East Ham Gasworks	N13 East Ham	Neighbourhoods	Reg18-E-136/345	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
	<p>This policy approach has now changed to limit any reference to specific heights on areas subject to tall building designation. Please see new wording in N14.SA2 Shrewsbury Road health complex site allocation.</p> <p>Although N14.SA2 Shrewsbury Road health complex site allocation doesn't fall within a Tall Building Zone, the design principles suggest that a mid-rise development (below 21m) is considered the most appropriate form of development to make a contribution to meeting Newham's housing need whilst sensitively integrating with the scale and massing of the existing urban fabric. N14.SA2 Shrewsbury Road health complex design principles give more guidance on design aspects but the details of the development proposal on the site and its impact will be assessed during the planning application process.</p>			Design Principles		N14.SA2 Shrewsbury Road health complex	N14 Green Street	Neighbourhoods	Reg18-K-016/002	Cllr James Beckles	<p>Reg18-K-016</p> <p>Reg 18-K-015</p>
	Local Plan Policy D4 refers to the Tall Building Policy.			4			N15 Forest Gate	Neighbourhoods	Reg18-Af-001/008	Forest Gate and Maryland Assembly	Reg18-Af-001

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed. A reference to the importance of conserving and enhancing the significance of heritage assets and the reference to the relevant Character Appraisal and Management Plans have been included. The wording of Policy D4 and relevant site allocation design principles have been changed to clarify how development proposals of tall buildings in proximity to sensitive areas should respond to the historic environment and manage the transition between conserve and transform areas. Please see the new wording in Table 1: Tall Building Zones, implementation text D4.3 and relevant site allocations, including N15.SA2 Woodgrange Road West.	Site allocation N15.SA2. We would point out that the site out is in close proximity to the Woodgrange Estate conservation area (there is an incorrect title in the text on page 490), a predominantly low-rise and residential area. Given the proposed height for the allocation, we consider that there should be clearer design parameters set out on page 492. This should include a requirement for proposals to conserve the significance of the Woodgrange Estate, and that the relevant conservation area character appraisal and management plan are drawn on to help ensure a successful relationship between what will be a much taller individual building and the two storey character that surrounds it. [Originally submitted in response to Neighbourhoods]		Design principles		N15.SA2 Woodgrange Road West	N15 Forest Gate	Neighbourhoods	Reg18-E-147/029	Historic England	Reg18-E-147

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets and, due to its District Centre designation, in a transform area, with a high level of accessibility, N15.SA2 Woodgrange Road West has been identified as suitable location for a tall building developments. However, due to its proximity to heritage asset, a reference to the importance of conserving and enhancing the significance of heritage assets and the reference to the relevant Character Appraisal and Management Plans have been included. Please see new wording in Policy D4, TBZ1: Forest Gate and N15.SA2 Woodgrange Road West site allocation. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>			Design principles		N15.SA2 Woodgrange Road West	N15 Forest Gate	Neighbourhoods	Reg18-E-087/020	Resident	Reg18-E-087

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as, based on the sieving exercise undertaken to identify suitable locations for tall buildings across the borough and due to its location in the Royal Docks and Beckton Riverside Opportunity Area, the N1.SA1 North Woolwich Gateway site allocation is considered suitable to accommodate tall building development. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p> <p>The impacts of overlooking and loss of privacy, overshadowing, and overbearing massing on neighbouring residential properties are addressed in Policy D6.3 and they will be assessed during the masterplanning and planning application process.</p>						N2 North Woolwich	Neighbourhoods	Reg18-K-031/004	Resident	Reg18-K-031

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This wording change has not been made. We did not consider this change to be appropriate as, whilst we acknowledge greater height is permissible under the adopted site allocation and that the site can still benefit from the adopted policy, the more detailed townscape work undertaken to support the emerging Local Plan, as directed by the London Plan (2021) demonstrates that greater heights would cause challenges for the delivery of Policy J1 on the adjacent SIL.</p> <p>However, the policy has changed to ensure the existing adjacent Strategic Industrial Location (SIL) is protected and enhanced. Please see the new wording in TBZ11: Lyle Park West and N2.SA2 Lyle Park West.</p>	<p>However, in regard to building heights, the site allocation sets out a recommendation of predominantly between 3 and 12 storeys, with 12 storeys toward the south fronting the river, and up to 16 storeys around the station. We object to the suggested height limits and consider that there is additional scope for height across the site, including buildings of up to 16 storeys along the river and other key locations.</p> <p>This [building heights] departs from the adopted site allocation which identifies indicative building heights of 10 to 12 storeys and up to 18 storeys at key locations.</p> <p>[Originally submitted in response to Neighbourhoods]</p>		Design principles		N3.SA2 Lyle Park West	N3 Royal Victoria	Neighbourhoods	Reg18-E-077/054	Ballymore Group	Reg18-E-077

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This wording change has not been made. We did not consider this change to be appropriate as, whilst we acknowledge greater height is permissible under the adopted site allocation and that the site can still benefit from the adopted policy, the more detailed townscape work undertaken to support the emerging Local Plan, as directed by the London Plan (2021) demonstrates that greater heights would cause challenges for the delivery of Policy J1 on the adjacent SIL.this change would cause challenges for the delivery of Policy J1 on the adjacent site. However, the policy has changed to ensure the existing adjacent Strategic Industrial Location (SIL) is protected and enhanced. Please see the new wording in TBZ11: Lyle Park West and N2.SA2 Lyle Park West.	As set out above in relation to the draft tall buildings policy, we also suggest that the allocation provides an opportunity to deliver additional height where it can be demonstrated that this is appropriate (in terms of high quality design, environmental impacts and residential quality etc), particularly along the riverfront and at other key locations across the site. This would also be in character with existing tall buildings along the river in the neighbouring Royal Wharf and Deanston Wharf developments. As such, we contend that the indicative heights within the draft site allocation should be updated to reflect the adopted allocation, which will allow any forthcoming development at the site to optimise the delivery of homes, in a form which reflects the established pattern of development across the strategic riverfront sites in this part of Newham. [Originally submitted in response to Neighbourhoods]		Design principles		N3.SA2 Lyle Park West	N3 Royal Victoria	Neighbourhoods	Reg18-E-077/056	Ballymore Group	Reg18-E-077

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”.</p> <p>Whilst we acknowledge that pre-application discussions have been held with LBN officers, and that the applicant could benefit from planning consents under the current Local Plan, the discussions are informed by the adopted Local Plan.</p> <p>The draft emerging Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context.</p> <p>More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p> <p>However, this policy approach has now changed to ensure a consistent approach to referencing heights in Policy D4 and the Neighbourhood policies. Please see the new wording in Table 1: Tall Buildings Zones, TBZ10: North Woolwich Road and N2.SA3</p>			Design Principles		N3.SA3 Connaught t Riverside	N3 Royal Victoria	Neighbourhoods	Reg18-E-077/062	Ballymore Group	Reg18-E-077

Comment Response	Connaught Riverside.
Comment	
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
	A change to this policy approach has not been made. We did not consider this change to be necessary as the impact of tall buildings has been address through a range of policies in the Local Plan. London Plan (2021) Policy D9 sets out a comprehensive list of criteria for tall buildings to meet, including environmental impacts. The impact of tall buildings has been taken into consideration and addressed in the Policy D4.3 which requires microclimate consideration, including wind and air quality assessments. The impacts of overlooking and loss of privacy, overshadowing, and overbearing massing on neighbouring residential properties are addressed in Policy D6.3 and they will be assessed during the masterplanning and planning application process.					N3.SA2 Lyle Park West	N3 Royal Victoria	Neighbourhoods	Reg18-Ab-001/133	Beckton and Royal Docks Assembly	Reg18-Ab-001
	Support noted.					N3.SA2 Lyle Park West	N3 Royal Victoria	Neighbourhoods	Reg18-E-096/009	L&Q	Reg18-E-096

Reg18-E-069	Silvertown Homes Ltd	Reg18-E-069/005	Neighbourhoods	N3 Royal Victoria	N3.SA4 Thameside West		Design Principles			<ul style="list-style-type: none"> • The text that supports the Site Allocation N3.5A4 (Page 333) limits building heights to 16- storeys and 6 to 9 along the DLR line, however, the Extant Mixed-Use Permission allows for development of up to 26-storeys (+97.90m). The Extant Mixed-Use Permission is supported by a Parameter Plan 04 Ref: A-SL-011-XX-05 Rev 04) which indicated the Maximum Heights Limit for all the buildings across the Masterplan (see Appendix 1); [Appendix 1 attached to representation - Image Site Layout Masterplan - Parameter Plan 04 Development Zones Maximum Height Limit] • The building heights indicated should be amended to reflect the Extant Mixed-Use Permission, ranging between 5 and 26-storeys; [Originally submitted in response to Neighbourhoods] 	<p>This policy approach has now changed following further analysis undertaken and outlined in the Tall Buildings Annex (2024). Through this analysis it was concluded that the 50m tall building zone could be extended to include the eastern part of the site which has the same suitability to tall building developments of the western part of the site. The change you have suggested has not resulted in a change as, whilst we acknowledge that consents have been granted with tall elements at greater heights than the heights allowed within the tall building zone designation in the emerging plan and that the site can still benefit from these consents, these consents were permitted under the adopted Local Plan. The draft emerging Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context.</p> <p>Based on the methodology used to identify suitable locations and heights for tall buildings, and due to its location in an area with limited accessibility to public transport, N2.SA4 Thameside West it is not considered appropriate for 100m Tall Building Zone designation. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024). Furthermore, this policy approach has now changed to ensure a consistency approach to referencing heights in Policy D4 and the Neighbourhood policies. Please see the new wording in Table 1: Tall Building Zone, TBZ13: Canning Town and relevant site allocations,</p>
-------------	----------------------	-----------------	----------------	-------------------	-----------------------	--	-------------------	--	--	--	---

												including N2.SA4 Thameside West.
--	--	--	--	--	--	--	--	--	--	--	--	----------------------------------

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Support noted.	<p>Design Principles</p> <p>The design principle section of the site allocation (page 340) outlines the following:</p> <p>Building heights should not exceed 10 storeys, with heights stepping down to 4 storeys. Taller buildings should be located in proximity of Royal Albert Way and Connaught North highway infrastructure, with scope for a taller building adjacent the dock edge to the west of the Council offices. Outside of these locations heights should be between 4 and 6 storeys.</p> <p>We agree that building heights should increase towards the north of the Site towards Royal Albert Way. The subject Site (and indeed the wider masterplan) is within Tall Building Zone 9, which has a prevailing height of between 7-10 storeys (with a maximum height of 32m).</p> <p>[Originally submitted in response to Neighbourhoods]</p>		Design Principles		N4.SA1 Royal Albert North	N4 Royal Albert North	Neighbourhoods	Reg18-E-075/008	Developer	Reg18-E-075

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed to ensure a consistent approach to referencing heights in Policy D4 and the Neighbourhood policies. Please see the new wording in Table 1: Tall Building Zones and relevant site allocations.	<p>The heights quoted within the site allocation are similar to the consented masterplan and reflects the existing buildings on Site which step up from 6-7 storeys on the docks and rise to 9 storeys towards the north of the Site.</p> <p>However, we do not agree that a maximum 10 storeys height is quoted in the allocation especially as there are different floor to ceiling heights for different uses that could be accommodated on the Site (e.g. residential and office use).</p> <p>[Originally submitted in response to Neighbourhoods]</p>		Design Principles		N4.SA1 Royal Albert North	N4 Royal Albert North	Neighbourhoods	Reg18-E-075/009a	Developer	Reg18-E-075

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 Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).	Tall Building Policy D4 states a maximum 32 metres is allowed within Tall Building Zone 9, which covers the consented masterplan site. We do not agree with an absolute height limit proposed and instead, any scheme that proposes above the prevailing height of 7-10 storeys should justify the height as part of the planning submission under Policy D4 Part 3. Development would naturally need to comply with City Airport height restrictions which we are aware limit the height in this location. [Originally submitted in response to Neighbourhoods]		Design Principles		N4.SA1 Royal Albert North	N4 Royal Albert North	Neighbourhoods	Reg18-E-075/009b	Developer	Reg18-E-075

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed to ensure a consistent approach to referencing heights in Policy D4 and the Neighbourhood policies. Please see the new wording in Table 1: Tall Building Zones, TBZ9: Royal Albert North and N3.SA1 Royal Albert North site allocation.	We note the Plan's designation that 'taller buildings should be located in proximity of Royal Albert Way and Connaught North highway infrastructure, with scope for a taller building adjacent the dock edge to the west of the Council offices. Outside of these locations heights should be between 4 and 6 storeys.' However, clarity is requested as to the level of heights supported and the rationale/methodology deployed for such limits – i.e.: - Fundamentally we consider the position on height limits to be overly prescriptive in the context of the Site's proximity to London City Airport. The airport makes the Site unique in terms of height constraints and therefore we see the placing of limits as being unnecessarily strict. Instead, we recommend that allowable heights should be based on airport height restrictions rather than a set figure. For example, placing height restrictions over the lifetime of the Plan does not account for increases in height that may be allowable following advancements in aviation technology. Setting height limits on airport restrictions would allow a more detailed and case-by-case assessment or appropriateness, taking into consideration the specific design and master-planning considerations of the development, rather than a blanket area		Design Principles		N4.SA1 Royal Albert North	N4 Royal Albert North	Neighbourhoods	Reg18-E-092/062	Royal Docks	Reg18-E-092

Comment Response	
Comment	wide set of figures. [Originally submitted in response to Neighbourhoods]
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
			with New Practice, Avison Young and GHPA (2022)								
	<p>This policy approach has now changed following further analysis undertaken and outlined in the Tall Building Annex (2024). Through this analysis it was concluded that the TBZ1: Canning Town could be extended to the northern part of the N5.SA5 Canning Town Riverside site allocations which has the same context and suitability to tall building developments of the southern part of the site.</p> <p>Furthermore, the neighbourhood boundaries have been amended to include the whole of the N5.SA5 site allocation in the Canning Town neighbourhood. Those changes will make a clearer plan and will improve the implementation of the site at application stages.</p> <p>Please see the new neighbourhood boundary on the policies map and new wording in Table 1: Tall Building Zones, TBZ13: Canning Town and N5.SA5 Canning Town Riverside site allocation.</p>	<p>As set out above, the Study identifies the southern part of the Site as falling within a TBZ. While we agree that the characteristics of the site make it suitable as a location for tall buildings, as set out above, the TBZ strategy should encompass the whole site to enable a comprehensive masterplan to be devised.</p> <p>[Originally submitted in response to Neighbourhoods]</p>		Design Principles		N5.SA5 Canning Town Riverside	N5 Canning Town and Custom House	Neighbourhoods	Reg18-E-121/053	Barratt London	Reg18-E-121

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”.</p> <p>However, the maximum permissible height in the Tall Building Zone has been increased to 60m to recognise the capacity for growth whilst preserving the spatial hierarchy aspiration of the plan.</p> <p>More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p> <p>Please see the new wording in Table 1: Tall Building Zones, TBZ13: Canning Town and N4.SA5 site allocation.</p>						N5 Canning Town and Custom House	Neighbourhoods	Reg18-E-121/056	Barratt London	Reg18-E-121

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed following further analysis undertaken and outlined in the Tall Buildings Annex (2024). Through this analysis it was concluded that the TBZ13: Canning Town could be extended to cover the N4.SA5 Canning Town Riverside site allocation in its entirety to recognise the suitability of the site for tall buildings development and its industrial intensification opportunity in line with Policy J1 and J2. Furthermore, it was concluded that the southern part of the N4.SA5 Canning Town Riverside site allocation could accommodate greater heights up to 60m to recognise its capacity for growth whilst preserving the spatial hierarchy aspiration for the borough and Canning Town area.</p> <p>Please see the new wording in Table 1: tall Building Zones, TBZ13: Canning Town and N4.SA5 Canning Town Riverside site allocation.</p> <p>However, the change you have suggested has not resulted in a change as, whilst we acknowledge that pre-application discussions have been held with LBN officers, the discussions are informed by the adopted Local Plan. The draft emerging Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough-wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context.</p> <p>More details on the methodology used to identify suitable locations for tall buildings</p>	<p>• In terms of the suitability of the Site for tall buildings, the applicant has undertaken extensive analysis of the site as part of the application process as described in this letter above. In our view, the site is capable of accommodating buildings in excess of the prescriptive limits expressed in the draft Local Plan.</p> <p>• The emerging draft Local Plan identifies Canning Town as a strategic location for intensification through development, including a managed shift away for traditional manufacturing, employment growth generally, and housing delivery. For the reasons identified in the Characterisation Study, the site is suitable for tall buildings, but the heights proposed fail to optimise the delivery of these strategic objectives.</p> <p>[Originally submitted in response to Neighbourhoods]</p>		Design Principles		N5.SA5 Canning Town Riverside	N5 Canning Town and Custom House	Neighbourhoods	Reg18-E-121/057	Barratt London	Reg18-E-121

Comment Response	can be found in the Tall Building Annex (2024).
Comment	
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
	Comment noted.	<ul style="list-style-type: none"> The development of the site for tall buildings has the potential to make a positive contribution to the skyline from various distances and viewing angles. A tiered development can provide a focus to the development with the tallest elements up to 100m tall most appropriately located adjacent to the A13. The position of taller blocks up to 100m adjacent to the A13 and river would be consistent with the emerging development pattern within Canning Town, with the transport interchange and confluence of transport infrastructure at its central locus. This would also create a transition to the lower rise industrial area to the north, and development of a more human scale along Bidder Street. An appropriately planned development of a variety of heights will break down the mass with sky gaps and provide an interesting and legible form. At long range views, the proposed variation of building forms and heights within the Site would read as an important piece of the wider formation of the tall building cluster at the western end of Canning Town centre and in the context of other tall buildings such as City Island and the Manor Road development. A taller building in this location would appear as a new element on the skyline in these longer-range 		Design Principles		N5.SA5 Canning Town Riverside	N5 Canning Town and Custom House	Neighbourhoods	Reg18-E-121/058	Barratt London	Reg18-E-121

Comment Response	
Comment	views, but will contribute positively to the developing skyline, and provide a wayfinding function for Canning Town generally. The placement of the buildings and composition would be important in creating an attractive undulating form created by City Island and the Hallsville Quarter, with the tallest elements on the Site up to 100m acting as a counterpoint to the Manor Road development. [Originally submitted in response to Neighbourhoods]
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
	<p>This policy approach has now changed to ensure a consistent approach to referencing heights in Policy D4 and the Neighbourhood policies. Please see the new wording in Table 1: Tall Building Zones, TBZ13: Canning Town and N4.SA5 site allocation.</p> <p>The comment you have provided has not resulted in a change as we did not consider this change to be appropriate as based on the sieving exercise to identify tall building locations and maximum heights and to preserve the spatial hierarchy aspiration of the plan and allow for a gradual transition to the surrounding context, N4.SA5 Canning Town Riverside is not considered an appropriate location to accommodate the greatest heights within the TBZ4: Canning Town. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>				Design principles		N5 Canning Town and Custom House	Neighbourhoods	Reg18-E-121/059	Barratt London	Reg18-E-121

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024). London Plan (2021) Policy D9 sets out a comprehensive list of criteria for tall buildings to meet, including environmental impacts. The impact of tall buildings has been taken into consideration and addressed in t Policy D4.3 which requires microclimate consideration, including wind and air quality assessment.</p> <p>To stress the importance of wind assessment in high streets and town centres, a wording change has been made. Please see the new wording in D4.3.</p>						N5 Canning Town and Custom House	Neighbourhoods	Reg18-Ac-001/184	Canning Town and Custom House Assembly	Reg18-Ac-001

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. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Due to its emerging context, its District Centre designation with a high level of public transport accessibility, and its capacity for growth within the Royal Docks & Beckton Riverside Opportunity Area, the N4.SA3 Canning Town Holiday Inn site allocation has been identified as a suitable area for tall buildings. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).			D4		N5.SA3 Canning Town Holiday Inn	N5 Canning Town and Custom House	Neighbourhoods	Reg18-Ac-001/188	Canning Town and Custom House Assembly	Reg18-Ac-001

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. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).			Design Principles		N5.SA3 Canning Town Holiday Inn	N5 Canning Town and Custom House	Neighbourhoods	Reg18-Ac-001/190	Canning Town and Custom House Assembly	Reg18-Ac-001

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need.</p> <p>Suitable locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Due to its location in the Royal Docks and Beckton Riverside Opportunity Area, its District Centre designation, in a transform area with a high level of accessibility, the N4.SA3 Canning Town Holiday Inn site allocation is considered suitable to accommodate tall buildings.</p> <p>More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p> <p>The impacts of overlooking and loss of privacy, overshadowing, and overbearing massing on neighbouring residential properties are addressed in Policy D6.3 and they will be assessed during the masterplanning and planning application process.</p>			Design Principles		N5.SA3 Canning Town Holiday Inn	N5 Canning Town and Custom House	Neighbourhoods	Reg18-Ac-001/192	Canning Town and Custom House Assembly	Reg18-Ac-001

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need.</p> <p>Suitable locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Due to its emerging context, its District Centre designation with a high level of public transport accessibility, and its capacity for growth within the Royal Docks & Beckton Riverside Opportunity Area, the Limmo site has been identified as a suitable area for tall buildings.</p> <p>Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>				D4	N5.SA4 Limmo	N5 Canning Town and Custom House	Neighbourhoods	Reg18-Ac-001/197b	Canning Town and Custom House Assembly	Reg18-Ac-001

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. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Due to its emerging context, its District Centre designation with a high level of public transport accessibility, and its capacity for growth within the Royal Docks & Beckton Riverside Opportunity Area, the Limmo site has been identified as a suitable area for tall buildings. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).					N5.SA4 Limmo	N5 Canning Town and Custom House	Neighbourhoods	Reg18-Ac-001/206	Canning Town and Custom House Assembly	Reg18-Ac-001

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>Unfortunately, it was no clear what change you want to make to this part of the plan. However, this policy approach has now changed following further analysis undertaken and outlined in the Tall Building Annex (2024).</p> <p>Through this analysis it was concluded that the 50m zones of TBZ12: Custom House should be reduced to one area only to mark Custom House station and the link to the Excel conference centre.</p> <p>Please see new wording in Table 1: Tall Building Zones, TBZ12: Custom House and relevant site allocations.</p>						N5 Canning Town and Custom House	Neighbourhoods	Reg18-Ac-001/211	Canning Town and Custom House Assembly	Reg18-Ac-001

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted.	<p>More specifically, it is the detail of the Draft Local Plan as it relates to facilitating appropriate development upon the Silvertown Way East site, relative to its context, that remains the primary focus of these representations.</p> <p>In setting the local context, the extract below is taken from the London Borough of Newham Local Plan Regulation 18 Policies Map (2022) and clearly shows the N5.SA2 Silvertown Way East site allocation with a red rectangular outline in the centre of the plan. The other key underlying designations for the site are identified as follows:</p> <ol style="list-style-type: none"> 1) Tall Buildings Zone (Policy D4) – Up to 50 metres in height – Identified by colour coded black and burgundy vertical line dissecting the allocated site in two 2) Tall Buildings Zone Prevailing height above 21 metres and below 32 metres (7-10 storeys) (Policy D4) – identified by orange diagonal line 3) Flood Zone 2 / 3 (Policy C7) – Identified by light blue and royal blue horizontal lines. <p>[Image attached – Figure 1 : Draft Newham Local Plan – Policies Map Extract (2022)] [Originally submitted in response to Neighbourhoods]</p>		Design Principles		N5.SA2 Silvertown Way East	N5 Canning Town and Custom House	Neighbourhoods	Reg18-E-045/008	Caxton Street North Limited	Reg18-E-045

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted.	<p>Representation No. 1</p> <p>Contrary to the presumption in favour of sustainable development, the draft Local Plan allocation N5.SA2 Silvertown Way East is overly prescriptive and misdirected in respect of appropriate building heights and their location and will therefore stifle opportunity to deliver the most effective and sensitive use of this strategically important site allocation, which forms a previously developed site in a highly accessible location within the Canning Town and Custom House Neighbourhood.</p> <p>The N5.SA2 Silvertown Way East allocation states under the heading of design principles that:</p> <p>‘Building heights should not exceed 16 storeys, with the tallest building provided on the intersection of Caxton Street North and Nelson Street. Heights should step down across the remainder of the site, between 9 and 4 storeys, with the lower storey buildings positioned adjacent neighbouring low rise residential to reduce amenity impacts.’ (Page 350)</p> <p>There are a number of aspects to this draft policy wording, which require closer inspection as detailed below:</p>		Design Principles		N5.SA2 Silvertown Way East	N5 Canning Town and Custom House	Neighbourhoods	Reg18-E-045/009	Caxton Street North Limited	Reg18-E-045

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted.	<p>a) Height of tallest buildings within N5.SA2</p> <p>The Draft Policies Map identifies the western portion of the site fronting Caxton Street North and the Silvertown Way flyover as carrying the greatest potential for the tallest buildings upon the subject site, with this area falling within a tall buildings zone allowing for buildings of up to 50 metres in height. Subject to appropriate floor to ceiling heights (remaining compliant with London Plan internal height requirements for habitable accommodation) and necessary floor build up for both structures and M&E, this 50 metre allowance could deliver buildings of up to 17 storeys in height (together with allowance for a 1 metre parapet height) and not 16 storeys as prescribed.</p> <p>[Originally submitted in response to Neighbourhoods]</p>		Design Principles		N5.SA2 Silvertown Way East	N5 Canning Town and Custom House	Neighbourhoods	Reg18-E-045/010	Caxton Street North Limited	Reg18-E-045

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted.	<p>The contextual suitability of buildings of 17 storeys in height is evidenced by the presence of the 17 storey Wallbrook Gardens Building at 58 Heartwell Avenue forming part of the Brunel Street Works Development. This site stands directly opposite the subject site fronting the western side of the Silvertown Way flyover.</p> <p>[Image attached – Figure 2 : Wallbrook Gardens Building at 58 Heartwell Avenue - Brunel Street Works (up to 17 Storeys)]</p> <p>[Originally submitted in response to Neighbourhoods]</p>		Design Principles		N5.SA2 Silvertown Way East	N5 Canning Town and Custom House	Neighbourhoods	Reg18-E-045/011	Caxton Street North Limited	Reg18-E-045

Reg18-E-045	Caxton Street North Limited	Reg18-E-045/012	Neighbourhoods	N5 Canning Town and Custom House	N5.SA2 Silvertown Way East		Design Principles			<p>Notwithstanding this point of detail above, we request the removal of unnecessary prescription on building heights within the emerging Local Plan and more specifically with reference to allocated site N5.SA2. The provision of a taller building or buildings often helps to define large multi-building regeneration schemes with height and elegance serving to define the proportions, identity and design integrity of the overall scheme in providing a focal point and landmark building. Taking the contrary view for the purposes of planning balance, we do recognise the Council's desire to provide guidance on recommended building heights in accordance with the findings of its 2020 Characterisation Study, particularly with many of the surrounding opportunity sites within this part of Canning Town and Custom House have already been developed and therefore setting a defined tone for appropriate height and context. However, we maintain that the appropriateness of height parameters should be more appropriately led by local context and tested via the rigors of a detailed planning application and masterplanning exercise rather than through a blunt prescribed upper threshold on heights expressed through the Local Plan. It is considered that a context led approach could deliver tall buildings upon the subject site without leading to the cumulative saturation of the skyline. This proposition will be fully tested via any future application submission.</p> <p>We therefore request that the upper</p>	<p>The change you have suggested has not been made. We did not consider this change to be appropriate as, while the site allocations provide an indicative estimate of the number of stories which could be achieved for explanatory purpose only, Policy D4 applies to all buildings of 21 m, irrespective of use and related floor to floor height. Tall building developments that fall within Tall Building Zones should be developed up to the maximum height parameter expressed in meters as within Policy D4. However, this has been clarified through a more consistent approach to describing heights. Please see new wording in Table 1: Tall Building Zones, TBZ13: Canning Town and N4.SA2 Silvertown Way East site allocation.</p>
-------------	-----------------------------	-----------------	----------------	----------------------------------	----------------------------	--	-------------------	--	--	---	--

										<p>height threshold of 16 storeys relating to the tallest building on site be removed and replaced with reference to 'buildings of or around 17 storeys in height' based upon the case presented above. It is considered that this revised wording would continue to respect the findings and conclusions of the Newham Characterisation Study (2022).</p> <p>[Originally submitted in response to Neighbourhoods]</p>	
--	--	--	--	--	--	--	--	--	--	--	--

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This wording change has not been made. We did not consider this change to be appropriate as, based on indicative design-based capacity testing undertaken to inform the site allocation design guidance's, and considering the spatial hierarchy aspiration of the plan and the proposed gradual transition to a low rise context, N4.SA2 Silvertown Way East site allocation is not considered capable of accommodating more than one tall element.</p>	<p>b) The number of tallest buildings within N5.SA2</p> <p>The current draft policy wording expresses reference to a tallest building of 16 storeys in height. As cited above, it is for the rigors of detailed design development under evolution of a detailed planning scheme to determine the appropriate height and form of the tallest buildings upon this site, Whilst there is every likelihood that there will be one tallest building on site, we request that reference is made to 'building(s)' plural to allow for the necessary architectural and design freedom in determining the future architectural concept for this site.</p> <p>This will reflect the approach to tall buildings along Silvertown Way as evidenced below. [Image attached – Figure 3 : Silvertown Way looking North]</p> <p>[Originally submitted in response to Neighbourhoods]</p>		Design Principles		N5.SA2 Silvertown Way East	N5 Canning Town and Custom House	Neighbourhoods	Reg18-E-045/013	Caxton Street North Limited	Reg18-E-045

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Support noted.	<p>c) Facilitate a potential cascade in building heights across the N5.SA2 site to allow for the successful transition in heights from west to east.</p> <p>We agree with the Council's proposition that the tallest buildings upon this allocated site should be located on its western side fronting Caxton Street North and with the lowest buildings (falling to as low as 4 storeys in height) to be located at the rear fronting Huntingdon Street. The latter will enable the sensitive transition to the two storey domestic scale properties within Tarling Road. This will also reflect the comparative height of the neighbouring Caxton Works development where fronting Huntingdon Street, which responds to the same local context of domestic scale residential development. This lower reference point for height at 4 storeys is not in dispute.</p> <p>[Originally submitted in response to Neighbourhoods]</p>		Design Principles		N5.SA2 Silvertown Way East	N5 Canning Town and Custom House	Neighbourhoods	Reg18-E-045/014	Caxton Street North Limited	Reg18-E-045

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>The change you have suggested has not been made. We did not consider this change to be appropriate as, while the site allocations provide an indicative estimate of the number of stories which could be achieved for explanatory purpose only, Policy D4 applies to all buildings of 21 m, irrespective of use and related floor to floor height. Tall building developments that fall within Tall Building Zones should to be developed up to the maximum height parameter expressed in meters as within Policy D4. However, this has been clarified through a more consistent approach to describing heights. Please see new wording in Table 1: Tall Building Zones, TBZ13: Canning Town and N4.SA2 Silvertown Way East site allocation. Furthermore, Policy D4.3 and D4.4 and supporting text have been expanded to ensure that proposal for tall building developments give enough consideration to the building form, character and relationship with context and public realm.</p>	<p>Rather, the prescriptive policy wording above, as drafted references a tallest building of 16 storeys and then the remainder ranging from between 9 and 4 storeys. It is maintained that this would create an awkward juxtaposition in heights between the tallest block and the next tallest building at 9 storeys and would be at odds in terms of design with the neighbouring Caxton Works scheme, which is afforded a more gradual and smoother transition in terms of building heights from tallest to smallest. This will best be addressed through allowing greater flexibility in wording for the intermediary building heights bridging the circa 17 storey buildings on the western side with the circa 4-5 storey buildings on the eastern side of the site. This would help to create an interrelated family of buildings in terms of height and form, rather than a disparate mix of individual buildings with no holistic group value.</p> <p>[Originally submitted in response to Neighbourhoods]</p>		Design Principles		N5.SA2 Silvertown Way East	N5 Canning Town and Custom House	Neighbourhoods	Reg18-E-045/015	Caxton Street North Limited	Reg18-E-045

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to ensure a consistent approach to referencing heights in Policy D4 and the Neighbourhood policies and to limit any reference to specific heights on areas subject to tall building designation. Please see new wording in Table 1: tall Building Zones, TBZ13: Canning Town and N4.SA2 Silvertown Way East site allocation.</p> <p>However, N4.SA2 Silvertown Way East site allocation design principles still require massing to step down towards the southern and eastern part of the site to sensitively integrate with the low rise context.</p> <p>The change you have suggested has not resulted in a change as, whilst the site allocations give an indicative estimation of number of stories could be achieved for explanatory purpose only, Policy D4 cover all buildings of 21 m, irrespective of use and related floor to floor height. Tall building developments that fall within Tall Building Zones should to be developed within the maximum height parameter expressed in meters as per Policy D4 and buildings that fall outside Tall Building Zones should sensitively integrate with the low rise context.</p>	<p>It is noted that the existing buildings to the rear of the neighbouring Caxton Works development terminate at 5 storeys in height on Huntington Street and 6 storeys in height on Hoy Street (please see photograph below).</p> <p>[3 images attached – Figure 4 : Huntington Street Looking North – View of Princes Court (part of Caxton Works Mixed-Use Scheme); Figure 5 : View from Hoy Street showing separation distance between rear gardens of Tarling Road Properties and 5 storey block within Caxton Works; Figure 6: View from Hoy Street looking northwards towards the rear of Caxton Works]</p> <p>Whilst this allows for some variation in height at the rear of the subject site as part of any future mixed-use scheme, the southeastern corner of the subject site to the rear of Nos. 13-27 (odd) Tarling Road, and their residential rear gardens, have a closer and more intimate relationship and therefore a building of 4 storeys in height is likely to be more appropriate in this location. On this basis, Caxton Street North Limited supports the Council's lower height threshold of 4 storeys at the rear, although scope exists for a slightly taller building up to 5 storeys to the south of Nelson Street to reflect local context and the height of the</p>		Design Principles		N5.SA2 Silvertown Way East	N5 Canning Town and Custom House	Neighbourhoods	Reg18-E-045/016	Caxton Street North Limited	Reg18-E-045

Comment Response	
Comment	comparative block upon Caxton Works to the rear at this junction. [Originally submitted in response to Neighbourhoods]
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
	The change you have suggested has not been made. We did not consider this change to be appropriate as, while the site allocations provide an indicative estimate of the number of stories which could be achieved for explanatory purpose only, Policy D4 applies to all buildings of 21 m, irrespective of use and related floor to floor height. Tall building developments that fall within Tall Building Zones should to be developed up to the maximum height parameter expressed in meters as within Policy D4. However, this has been clarified through a more consistent approach to describing heights. Please see new wording in Table 1: Tall Building Zones, TBZ13: Canning Town and N4.SA2 Silvertown Way East site allocation.	d) The Council is requested to remedy current ambiguity and conflict in prescribed prevailing building heights for the remainder of the allocated site N5.SA2. Prevailing building heights on the western side of the site (within the tall buildings zone) are identified as being between 7 – 10 storeys in height, whilst the prescribed range of general building heights for future development upon N5.SA2 (excluding the prescribed tall building) is stated as falling between 9 and 4 storeys. Notwithstanding items a) and b) above, it is respectfully requested that as a minimum, to ensure compatibility within policy in the delivery of the remaining buildings on site, (excluding the taller buildings within the range of 17 storeys) the policy wording should be amended to fall within the threshold of 10 to 4 storeys in height. This will ensure compatibility with Local Plan Policy for prevailing building heights and would reflect the general prevailing upper height threshold of 10 storeys for the part of the site identified within the tall buildings zone. [Originally submitted in response to Neighbourhoods]		Design Principles		N5.SA2 Silvertown Way East	N5 Canning Town and Custom House	Neighbourhoods	Reg18-E-045/017	Caxton Street North Limited	Reg18-E-045

Reg18-E-045	Caxton Street North Limited	Reg18-E-045/018	Neighbourhoods	N5 Canning Town and Custom House	N5.SA2 Silvertown Way East		Design Principles			<p>e) The extent of allocated site falling within the tall buildings zone should be altered to enable effective delivery of development fronting Caxton Street North.</p> <p>The southern end of the tall buildings zone where it falls within and dissects the subject site (N5.SA2) cuts back acutely towards Caxton Street North. This is demonstrated within the Draft Local Plan Policies extract on the next page. The consequence of this acute cutback in the tall buildings zone is that it effectively blights the opportunity to deliver a tall building of 7 storeys or more within the southern end of the subject site where fronting Caxton Street North. Whilst it is acknowledged that this southern part of the site is not appropriate for siting the tallest building on site, particularly due to the presence of the four storey residential flat block (Ardennes House – No.118 Victoria Dock Road) to the immediate south, in terms of creating contextually appropriate development and an effective cascade in building heights it is considered that this can be successfully achieved through provision of an intervening block of circa 7-10 storeys in this location. This would reflect the prevailing building heights within the tall buildings zone at 7-10 storeys. To accurately reflect this and enable the provision of meaningful development at the southern end of the Caxton Street North frontage, it is requested that the demarcation of the tall buildings zone be altered to include the area highlighted in green (below), which strikes an appropriate balance between the provision of a plot size</p>	This change has been made. Please see the new map in Policy D4.
-------------	-----------------------------	-----------------	----------------	----------------------------------	----------------------------	--	-------------------	--	--	--	---

										<p>sufficient to accommodate a building on this scale, whilst also respecting the rear building line of the neighbouring 4 storey Ardennes House apartment building.</p> <p>[Image attached - Figure 7: Suggested Amendment to Newham Local Plan Policies Map – Tall Buildings Zone]</p> <p>[Originally submitted in response to Neighbourhoods]</p>	
--	--	--	--	--	--	--	--	--	--	--	--

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted.	<p>It is important to note that there are only limited ancillary windows on the northwestern facing elevation of Ardennes House overlooking the subject site, with the commercial building accommodating the Peacocks Gym located alongside tight to the shared site boundary. This affords some opportunity for a taller building in this location without unduly impacting upon neighbouring residential amenity. That said, it is recognised that the angled skylights at roof level within Ardennes House provide some indirect and oblique amenity benefit to habitable accommodation, requiring any proposed new building alongside to sensitively respect this existing amenity to avoid any undue overbearing impact.</p> <p>[Image attached - Figure 8 : Elevated View of Northwestern facing elevation of Ardennes House taken from the Silvertown Way Flyover]</p> <p>[Originally submitted in response to Neighbourhoods]</p>		Design Principles		N5.SA2 Silvertown Way East	N5 Canning Town and Custom House	Neighbourhoods	Reg18-E-045/019	Caxton Street North Limited	Reg18-E-045

Reg18-E-045	Caxton Street North Limited	Reg18-E-045/020	Neighbourhoods	N5 Canning Town and Custom House	N5.SA2 Silvertown Way East		Design Principles		<p>f) The draft policy wording seeks to locate the tallest building 'on the intersection of Caxton Street North and Nelson Street'. On the basis of adequately protecting the amenity of existing neighbouring and future residential occupiers the tallest building should be located in a more southerly position providing adequate separation distance to the closest residential properties within Caxton Works.</p> <p>[Image attached - Figure 9: View Towards Intersection of Caxton Street North and Nelson Street]</p> <p>Caxton Street North Limited and its urban design and planning advisors are of the view that the tallest building(s) upon site allocation N5.SA2 should not be located at the intersection of Caxton Street North and Nelson Street. This corner is highlighted within the photograph above, showing the very close interrelationship with the 11-13 storey facing Thanet Tower at the southern end of the neighbouring Caxton Works Scheme. The photograph above clearly shows the extent to which windows serving habitable rooms within this neighbouring block would be affected by direct overlooking and loss of daylight/sunlight through the presence of an equivalent tall building on the opposite corner located due south of the existing building. The intervening presence of Nelson Street would not be enough to create adequate spatial separation between blocks to create an appropriate relationship in townscape and amenity terms.</p>	<p>This wording approach has now changed. Whilst the design principles seek to preserve the spatial hierarchy aspiration of the plan and the transition from the Canning Town cluster to a low rise context, the new wording ensure the location of the tall element in the northern part of the site is indicative and subject to further impact assessment in relation to existing developments. Please see the new wording in N4.SA2 Silvertown Way East Design Principles.</p>
-------------	-----------------------------	-----------------	----------------	----------------------------------	----------------------------	--	-------------------	--	---	--

										<p>We therefore suggest that the tallest building(s) on site are located further to the south, whilst still fronting Caxton Street North, and should therefore be clustered around the northern and southern corners of the intersection of Caxton Street North with Fen Street. This would continue to deliver the Council's development aspirations for the site, but would achieve this with a responsible and sensitive placement of development in townscape, amenity and environmental terms.</p> <p>[Originally submitted in response to Neighbourhoods]</p>	
--	--	--	--	--	--	--	--	--	--	---	--

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted.	Based upon the 6 strands to these representations outlined above, we respectfully request that the wording of Policy N5.SA2 as it relates to building heights be suitably amended. The suggested revised worded is outlined within the conclusions to these representations. [Originally submitted in response to Neighbourhoods]		Design Principles		N5.SA2 Silvertown Way East	N5 Canning Town and Custom House	Neighbourhoods	Reg18-E-045/021	Caxton Street North Limited	Reg18-E-045

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
				Design Principles		N5.SA2 Silvertown Way East	N5 Canning Town and Custom House	Neighbourhoods	Reg18-E-045/031	Caxton Street North Limited	Reg18-E-045
	<p><u>Existing Wording - Heights</u> 'Building heights should not exceed 16 storeys, with the tallest building provided on the intersection of Caxton Street North and Nelson Street. Heights should step down across the remainder of the site, between 9 and 4 storeys, with lower storey buildings positioned adjacent neighbouring low rise residential to reduce amenity impacts.'</p> <p><u>Proposed Wording - Heights</u> 'Buildings rising to a maximum of or around 17 storeys in height should be focused upon the western portion of the site where located within the designated Tall Buildings Zone. The tallest buildings on site should be clustered around the junction of Fen Street and Caxton Street North, with surrounding new buildings across the remainder of the site to the east provided in the range of 10 down to 4 storeys in height, the latter 4 storey height deemed appropriate for the south-eastern corner of the site fronting Huntingdon Street.</p> <p>The height of buildings must be townscape and context led and must also seek to protect the amenity of existing neighbouring residential occupiers.'</p> <p>[Originally submitted in response to Neighbourhoods]</p>										
	<p>The change you have suggested has not been made. We did not consider this change to be appropriate as, while the site allocations provide an indicative estimate of the number of stories which could be achieved for explanatory purpose only, Policy D4 applies to all buildings of 21 m, irrespective of use and related floor to floor height. Tall building developments that fall within Tall Building Zones should be developed up to the maximum height parameter expressed in meters as within Policy D4. However, this has been clarified through a more consistent approach to describing heights. Please see new wording in Table 1: Tall Building Zones, TBZ13: Canning Town and N4.SA2 Silvertown Way East site allocation.</p>										

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	In addition, we respectfully draw officers' attention to the requested changes to the tall buildings zone within the Draft Newham Local Plan Policies Map and the minor amendments required to N5.SA2 policy wording identified under other matters at paragraph 3.25 of this report. [Originally submitted in response to Neighbourhoods]			Design Principles		N5.SA2 Silvertown Way East	N5 Canning Town and Custom House	Neighbourhoods	Reg18-E-045/033	Caxton Street North Limited	Reg18-E-045
	Intended height limits and expectations should be recommended to avoid clusters of modern tall high rise blocks but low rise development that compliments existing buildings and heights. [Originally submitted in response to Neighbourhoods]			Design principles		N5.SA1 Canning Town East	N5 Canning Town and Custom House	Neighbourhoods	Reg18-K-016/005	Cllr James Beckles	Reg18-K-016
	This change has been made. Please see the new map in Policy D4.										
	A change to this policy approach has not been made. We did not consider this change to be appropriate as, based on the sieving exercise undertaken to identify suitable locations for tall buildings across the borough and, due to its location in the Royal Docks and Beckton Riverside Opportunity Area, its District Centre designation, in a transform area with a high level of accessibility area, N4.SA1 Canning Town East site allocation is considered suitable to accommodate tall buildings developments. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).										

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed following further analysis undertaken and outlined in the Tall Buildings Annex (2024). Through this analysis it was concluded that the southern part of the N4.SA5 Canning Town Riverside site allocation could accommodate greater heights up to 60m whilst preserving the spatial hierarchy aspiration for the borough and Canning Town area.</p> <p>Please see the new wording in Table 1: Tall Building Zones, TBZ13: Canning Town and relevant site allocations, including N4.SA5 Canning Town Riverside.</p> <p>However, the change you have suggested has not resulted in a change as we did not consider this change to be appropriate as, based on the methodology used to identify suitable locations and heights for tall buildings, N4.SA5 Canning Town Riverside is not considered appropriate for a 100m Tall Building Zone designation. The maximum permissible heights seek to preserve the spatial hierarchy aspiration for the borough and Canning Town area.</p> <p>More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>						N5 Canning Town and Custom House	Neighbourhoods	Reg18-E-126/072	IXDS Ltd	Reg18-E-126

Reg18-K-012	IXO (New River Place) LLP	Reg18-K-012/032	Neighbourhoods	N5 Canning Town and Custom House	N5.SA1 Canning Town East		Design principles		<p>Furthermore, the height requirement as per Design Principles of N5.SA1 Canning Town East states “Building heights should not exceed 16 storeys, with taller buildings concentrated in proximity of the A13, stepping down to around 7 storeys. Across the rest of the site, heights should broadly range between 3 and 9 storeys, with taller buildings marking green spaces and being sensitive to nearby heritage receptors. Massing should be positioned sensitively, stepping down to integrate with the prevailing building heights to the south and east of the site.”</p> <p>The Site is being designed to respond sensitively to the heritage asset and neighbouring properties whilst re-establishing the community facilities as an anchor to existing and future residents. We consider that the height requirements as per Design Principles unduly prescriptive and do not reflect the ambitions or the changing environment of Canning Town. We recommend that flexibility should be retained to avoid compromising the social benefits of the scheme, which will be cross-funded by the introduction of residential development onto the Site. The agreed Masterplan for the Site acknowledges the RCC site as being appropriate for a tall building, and the emerging policy position should reflect those discussions.</p> <p>Therefore, we recommend the wording of the relevant part of N5.SA1 should be reworded:</p> <p>“Building heights are encouraged not to</p>	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”.</p> <p>More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p> <p>However, this policy approach has now changed to ensure a consistent approach to referencing heights in Policy D4 and the Neighbourhood policies. Please see the new wording in Table 1: Tall Building Zones, TBZ13: Canning Town and N4.SA1 Canning Town East site allocation.</p>
-------------	---------------------------	-----------------	----------------	----------------------------------	--------------------------	--	-------------------	--	---	---

										<p>exceed 16 storeys, with taller buildings concentrated in proximity of the A13, stepping down to around 7 storeys. Across the rest of the site, heights may broadly range between 3 and 9 storeys, with taller buildings marking green spaces and being sensitive to nearby heritage. Taller buildings may be considered acceptable subject to evidence that demonstrates added value and positive contributions relative to low-rise alternatives, and exemplary design, execution and management standards”</p> <p>[Originally submitted in response to Neighbourhoods]</p>	
--	--	--	--	--	--	--	--	--	--	---	--

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed. The implementation text for policy D4.3 has expanded, so that the environmental impact considerations section requires the impact of tall buildings on watercourse and open space to be considered in line with policies GWS2 and GWS3, which require development proposals for tall buildings to demonstrate consideration of their impact on biodiversity and existing and proposed public open space, including watercourses. Furthermore, implementation text D4.3 is clear that development proposals for tall buildings are required to address the criteria set by London Plan (2021) Policy D9 section C, including visual, environmental and cumulative impact and to demonstrate this in a tall building section of the Design Access Statement. The wording of Policy D4 and relevant site allocation design principles have been changed. Please see the new wording in implementation text D4.3 and N4.SA4 Limmo site allocation.</p>	<p>Similar concerns are relevant in terms of site allocations further south on the Limmo site (N5.SA4) [...]. Although both of these sites are located further away from the Park boundary the implications of the tall building policy, and the allocation of buildings between 10 and 19 storeys on the Limmo site [...], should also ensure the cumulative impact of tall buildings are taken into consideration in terms of the Regional Park at Bow Creek Ecology Park and also at East India Dock Basin which sits just over the boundary in Tower Hamlets. [Originally submitted in response to Neighbourhoods]</p>		Design Principles		N5.SA4 Limmo	N5 Canning Town and Custom House	Neighbourhoods	Reg18-E-097/020	Lee Valley Regional Park Authority	Reg18-E-097

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed. The implementation text for policy D4.3 has expanded, so that the environmental impact considerations section requires the impact of tall buildings on watercourse and open space to be considered in line with policies GWS2 and GWS3, which require development proposals for tall buildings to demonstrate consideration of their impact on biodiversity and existing and proposed public open space, including watercourses. Furthermore, implementation text D4.3 is clear that development proposals for tall buildings are required to address the criteria set by London Plan (2021) Policy D9 section C, including visual, environmental and cumulative impact and to demonstrate this in a tall building section of the Design Access Statement. The wording of Policy D4 and relevant site allocation design principles have been changed. Please see the new wording in implementation text D4.3 and N4.SA5 Canning Town Riverside site allocation.			Design Principles		N5.SA5 Canning Town Riverside	N5 Canning Town and Custom House	Neighbourhoods	Reg18-E-097/021	Lee Valley Regional Park Authority	Reg18-E-097

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Support noted.	The site allocation plan for the Limmo allocation indicates a setback for development from the southern edge of the site. Taller buildings proposed for the site (up to 19 storeys) are to be concentrated adjacent to the railway line in the northern portion of the site and the infrastructure requirements identify the need for new open space provision to be concentrated on the south of the site. These measures are supported as they would ensure a degree of openness alongside the waterways and might assist in protecting some views out from EIDB although existing development within the area on sites within Tower Hamlets already dominates the skyline from EIDB. [Originally submitted in response to Neighbourhoods]		Design Principles		N5.SA4 Limmo	N5 Canning Town and Custom House	Neighbourhoods	Reg18-E-097/043a	Lee Valley Regional Park Authority	Reg18-E-097

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		<p>b. Design Principles (Height and Massing)</p> <p>The draft allocation states that “building heights should not exceed 16 storeys, with taller buildings concentrated along Silvertown Way, stepping down to eight storeys to the southern part of the site fronting Silvertown Way. To the northeast of the site, heights should range between 8 and 6 storeys, stepping down in height adjacent lower rise developments adjacent the site to the north and east.”</p> <p>This general approach to height and massing is broadly supported in terms of concentrating taller elements along Silvertown Way, as well as more centrally within the Site, and then providing lower shoulders to the east and south to positively respond to the existing (and emerging) scale of the immediate built form. In this way, it is considered that a balanced approach between scale and massing can be achieved as development transitions across the Site. This is what has been explored as part of the initial design feasibility work. [Originally submitted in response to Neighbourhoods]</p>		Design Principles		N5.SA3 Canning Town Holiday Inn	N5 Canning Town and Custom House	Neighbourhoods	Reg18-E-078/022	Redefine Hotels Portfolio IV Ltd	Reg18-E-078

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development. Locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>	<p>However, in turn, this has identified capacity for greater height on the Site then currently identified within the draft allocation, including the potential for 18 and 28 storey elements. This is in having regard to the other recently built-out and emerging developments surrounding the Site which comprise buildings of 16, 17, 23 and 26 storeys. These clearly demonstrate the scope for intensified height in this location and sets a strong precedent for the Site's redevelopment.</p> <p>As the Council is aware, the London Plan provides regional planning policy for the preparation of Development Plans and London Plan Policy D9 (Tall Buildings) details specifically the approach that should be taken in requiring Local Plans to determine and clearly identify appropriate locations for tall buildings. This recognises that what constitutes a 'tall building' will be subject to specific localities and the supporting text (paragraph 3.9.3) states that "tall buildings are generally those that are substantially taller than their surroundings and cause a significant change to the skyline" and "in large areas of extensive change, such as Opportunity Areas, the threshold for what constitutes a tall building should relate to the evolving (not just the existing) context". The immediate height context for the</p>		Design Principles		N5.SA3 Canning Town Holiday Inn	N5 Canning Town and Custom House	Neighbourhoods	Reg18-E-078/023	Redefine Hotels Portfolio IV Ltd	Reg18-E-078

Comment Response	
Comment	Site has therefore established a high threshold for what should be considered a tall building in this location. [Originally submitted in response to Neighbourhoods]
Implementation	
Justification	
Clause	
Introduction	
Site allocation	
Policy	
Chapter	
Comment Reference	
Representor	
Representation Reference	

Reg18-E-078	Redefine Hotels Portfolio IV Ltd	Reg18-E-078/024	Neighbourhoods	N5 Canning Town and Custom House	N5.SA5 Canning Town Riverside		Design Principles			<p>The above is confirmed by the Newham Characterisation Study (2022) which forms part of the evidence base supporting the new Local Plan. In line with the expectations of London Plan Policy D9 we understand this has informed draft Policy D4 as well as the designation of 'Tall Building Zones' and their maximum parameters. The Characterisation Study recognises the existing character of Canning Town as a 'Town Centre' which comprises an extensive existing 'Tall Building Zone' (p.17). Compared to other town centres within Newham, Canning Town is not notably constrained by its heritage context with the number of assets relatively sparse and largely located beyond the town centre itself (p. 22). It is acknowledged to hold a prominent position at the meeting point of the strategic and local highway network (p.26) and as such, its existing urban morphology is noted to comprise a mix of building heights and uses with new developments encouraging a vertical approach around pedestrianised streets (pp. 71-75). It is considered to have a "successful quality" of urban form and character (p. 142) and whilst it is noted to be "somewhat sensitive to change" (p. 144), this sits at the lower end of the sensitivity scale and is stated to be due to the area comprising "development of cohesive design but not historic / architectural value" which we agree aligns with the earlier assessments of the existing and emerging context (p. 144). As such, it is concluded that Canning Town has a "high opportunity for growth" (p. 146) and is earmarked for</p>	<p>Newham Characterisation Study (2023) has been supplemented with a Tall Building Annex (2024). The document summarizes the sieving exercise that has been undertaken to identify locations where tall buildings may be an appropriate form of development and expands on the townscape assessment for each area of the borough. More details on the methodology used to identify suitable locations for tall buildings can be found on the Tall Building Annex (2024).</p> <p>A review of the context's prevailing heights was part of the methodology to establish the maximum heights. However, the new plan is setting a new policy direction, as informed by London Plan Policy D9 and the maximum permissible heights seek to preserve the spatial hierarchy aspiration for the borough and Canning Town area.</p> <p>In regard to prevailing heights, Newham Characterisation Study clearly states that "Sites that have a high capacity for growth and that can be transformed but that are affected by external edge conditions such as: [...] the saturation of a tall building cluster in the same area (Canning Town and Stratford High Street); have been identified as areas that can have a prevailing building datum above 21m and up to 32m."</p> <p>The proposed prevailing heights within Tall Building Zones help establishing a consistent building datum from which taller building elements could emerge, and to create a gradual and sensitive transition to the surrounding context.</p>
-------------	----------------------------------	-----------------	----------------	----------------------------------	-------------------------------	--	-------------------	--	--	---	--

									<p>“transformation” (p.151). In terms of the strategy for future development this is defined as “substantially increase development by introducing new building types with scope to creating a new street pattern / frontage” (p. 159). There is repeated reference to high density development, as part of this, and the role of scale in providing a buffer along key movement corridors.</p> <p>In areas of mid to high density, such as Canning Town, the Characterisation Study states that “...buildings of 16+ storeys would read as tall” and the existing height map demonstrates how the existing character along Silvertown Way comprises heights of 41-50m (noted to be 14-16 storeys), up to heights of 61-100m (noted to be 21-33 storeys) (p. 163). As such, it is considered to comprise a “non-sensitive context” (p. 164) to new tall buildings, which we note would be classified as 16+ storeys in this location.</p> <p>Notwithstanding the above, we note that the draft Policies Map identifies the Site to sit within a prevailing height of above 21m but below 32m which is defined as 7-10 storeys. This is reiterated in draft Policy D4 (Tall Buildings) where the draft allocation is identified as part of Tall Building Zone “TBZ13: Canning Town”. We would disagree with this prevailing height statement, in noting heights of 15 – 26 storeys opposite and alongside the Site on Silvertown Way which provide a mid-point of 18 storeys (which could be equivalent to 54m assuming a residential floor to ceiling height of 3m). This is</p>	
--	--	--	--	--	--	--	--	--	--	--

										<p>therefore nearly double the prevailing height identified in the Draft Local Plan and aligns with the findings of the Characterisation Study in terms of recognising a “tall” existing height context.</p> <p>[Originally submitted in response to Neighbourhoods]</p>	
--	--	--	--	--	--	--	--	--	--	--	--

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Support noted.	<p>In terms of potential future height parameters, the draft Policies Map refers to a maximum height of 50m (16-20 storeys subject to land use mix) across the TBZ13 but does identify 2-3 locations within that for heights of up to 100m (potentially up to 40 storeys). We understand from draft Policy D4 that these taller pockets remain focused around Canning Town Station as a central cluster of the highest tall buildings, with new tall elements stepping down from that. This primary focus for the continued concentration of the greatest height and massing is not disputed and we note aligns with the recommendations of the Characterisation Study which states “opportunities for intensification primarily lies in continuing regeneration around Canning Town Station and Custom House” (p. 197).</p> <p>[Originally submitted in response to Neighbourhoods]</p>		Design Principles		N5.SA5 Canning Town Riverside	N5 Canning Town and Custom House	Neighbourhoods	Reg18-E-078/025	Redefine Hotels Portfolio IV Ltd	Reg18-E-078

Reg18-E-078	Redefine Hotels Portfolio IV Ltd	Reg18-E-078/026	Neighbourhoods	N5 Canning Town and Custom House	N5.SA5 Canning Town Riverside		Design Principles		<p>However, it is considered that there is scope for a more gradual distribution of this, away from the centre and above a height of 50m. The developments surrounding the Site immediately to the north and west have already demonstrated the capacity for this with heights of 23 and 26 storeys (which could be equivalent to circa 75m assuming a residential floor to ceiling height of 3m from first floor). As part of this transition, and in supporting the delivery of a viable scheme which optimises the potential of the Site, the initial design feasibility work has identified scope for up to 28 storey element (potentially up to 84m) and has started to consider how this could be carefully designed in terms of step-ins and set-backs to break up the massing as well as step down to shoulder heights of 18 and 17 storeys in-keeping with the mid-point along Silvertown Way. This is before dropping down again to 11 storeys at the southern-most point of the Site in providing that human-scale onto the street scene which aligns with the aspirations of the draft allocation and the lower shoulder height for the area recognised within the Characterisation Study.</p> <p>It is therefore considered that the identified maximum height parameters for the Site are unduly restrictive at this stage, limiting development below the “tall” building threshold identified for this location, at 16+ storeys. This does not align with the findings of the Characterisation Study which has identified a continued capacity for “tall” buildings with no sensitivity to change</p>	<p>This policy approach has not been changed. We did not consider this change to be appropriate as, based on the sieving exercise to identify tall building locations and maximum heights, this Site is not considered appropriate to accommodate greater heights.</p> <p>A cluster of tall buildings has already been established in Canning Town, creating a distinctive skyline marking Canning Town District Centre. Within this cluster, Heartwell buildings in the Brunell Street Works complex, has been identified as the tallest building with a height up to 26 storeys marking Canning Town Station. The proposed maximum permissible heights seek to set and preserve a borough wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>
-------------	----------------------------------	-----------------	----------------	----------------------------------	-------------------------------	--	-------------------	--	---	---

										<p>where brought forward through a designed approach. It is fully acknowledged that such buildings will need to demonstrate that they are of high quality design and supported by robust technical analysis which considers the cumulative impact to avoid saturating the skyline and be positioned to promote wayfinding. This is secured through parts 3 and 4 of draft Policy D4 and recognised by the Characterisation Study where it is clear that the development of proposals tall buildings will need to be supported by a suite of technical assessments to include specialist townscape and visual analysis. This will inform the refinement of tall buildings on the Site and demonstrate how the proposed heights fit with the character of the local area and are appropriate within their existing and emerging context.</p> <p>[Originally submitted in response to Neighbourhoods]</p>	
--	--	--	--	--	--	--	--	--	--	--	--

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”.</p> <p>Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>	<p>At this stage, there does not seem to have been any formal visual analysis of strategic or local views and/o impact testing undertaken to justify the contextually low maximum height parameters that are being set for the Site. It is agreed that this is the role of the development management stage in determining that next level of detail. It is therefore critical that the Local Plan provides some flexibility and is not prematurely prescriptive before this further technical analysis can be undertaken in support of and to justify development proposals. As such, we would recommend that height parameters are removed completely from policy and site allocations, particularly where these stated heights are providing maximum limits within Tall Building Zones that are not to be exceeded, as set out under draft Policy D4 (2.).</p> <p>[Originally submitted in response to Neighbourhoods]</p>		Design Principles			N5 Canning Town and Custom House	N5 Canning Town and Custom House	N5.SA5 Canning Town Riverside		Reg18-E-078

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”.</p> <p>Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>						N5 Canning Town and Custom House	Neighbourhoods	Reg18-E-078/028	Redefine Hotels Portfolio IV Ltd	Reg18-E-078

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	The change you have suggested has not been made. We did not consider this change to be appropriate as, while the site allocations provide an indicative estimate of the number of stories which could be achieved for explanatory purposes only, Policy D4 applies to all buildings of 21m, irrespective of use and related floor to floor heights. Tall building developments that fall within Tall Building Zones should be developed up to the maximum height parameter expressed in meters within Policy D4. However this has been clarified through a more consistent approach to describing heights. Please see new wording in Table 1: Tall Building Zones, , TBZ13: Canning Town and N4.SA5 Canning Town Riverside site allocation.	In this case, we would recommend that any height parameters referred to in the Draft Local Plan are cited on the basis of metres only, rather than specifying storeys. This is on the basis that as the Council will be aware, the GLA's standards require a minimum floor-to-ceiling height for residential at 2.5m and commercial and other town centre uses could feasibly achieve 3m. There will therefore be different assumptions in terms of floor-to-ceiling height across residential, commercial and other town centre uses forming part of mixed-use redevelopment schemes. As such, the inclusion of storey references could be misleading and inaccurate. A maximum parameter on the basis of metres only would be sound and clear in providing robust guideless for future application proposals. [Originally submitted in response to Neighbourhoods]		Design Principles		N5.SA5 Canning Town Riverside	N5 Canning Town and Custom House	Neighbourhoods	Reg18-E-078/029	Redefine Hotels Portfolio IV Ltd	Reg18-E-078

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”.</p> <p>Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>								Reg18-E-078/030	Redefine Hotels Portfolio IV Ltd	Reg18-E-078

Reg18-E-078	Redefine Hotels Portfolio IV Ltd	Reg18-E-078/031	Neighbourhoods	N5 Canning Town and Custom House	N5.SA5 Canning Town Riverside		Design Principles		<p>[Recommendations In the interest of soundness in accordance with NPPF 35, we would recommend the following amendments to draft policy and allocation wording:]</p> <p>2. Where the Council considers that it is necessary to provide some guidance in relation to height parameters, then these should clearly be stated as <u>indicative only</u> and not maximums, on the basis of the following:</p> <ul style="list-style-type: none"> · Policy D4 (Part 2.) – “Tall buildings will only be acceptable, subject to detailed design and masterplanning considerations, in areas marked on the Policies Map as ‘Tall Building Zones’. The height of tall buildings in any ‘Tall Buildings Zone’ should be informed by the indicative height parameters not exceed the respective limits set in Table 1 below”. · Policy D4 (Table 1, Column 4 heading) – “Indicative Height Range Maximum”. · Policy D4 (TBZ13, Height Range Maximum) – “50m and 40m, 60m and up to 100m in the defined areas surrounding Canning Town station, 40-90m within the defined area outside of the Canning Town station core”. · Policy D4 (TBZ13, Further Guidance) – “Prevailing heights between 21m and 32m 40m – 65m”. · Policy D4 (TBZ13, Further Guidance) – “In the north-east of the rest of the Tall Building Zone, a limited number tall building elements of up to between 40m and 90m could be delivered subject to careful transition to the lower rise residential development and careful integration to aid wayfinding and mark special locations to the east”. 	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”.</p> <p>Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>
-------------	----------------------------------	-----------------	----------------	----------------------------------	-------------------------------	--	-------------------	--	--	---

										<ul style="list-style-type: none"> · Policy D4 (TBZ13, Further Guidance) – “In the rest of the Tall Building Zone, including to mark the new DLR station and local centre at Thameside West, limited additional tall buildings with elements of up to 50m, could be integrated carefully to aid wayfinding and mark special locations”. · Policy D4 Tall Building Zone Map and Draft Policies Map – “maximum indicative height” for TBZ13 to be amended from 50m and shown as up to 90m. · Policy D4 Tall Building Zone Map and Draft Policies Map – prevailing height to be amended from “above 21m but below 32m (7-10 storeys)” to 40m – 75m. · Allocation N5.SA3 (Para. 5) – “Building heights should not exceed 16 storeys be informed by the indicative heights set out for TBZ13, with taller buildings concentrated along Silvertown Way, stepping down to eight storeys to the southern part of the site fronting Silvertown Way. To the northeast of the site, heights should range between 8 and 6 storeys, stepping down in height adjacent lower rise developments adjacent the site to the north and east. Proposals for tall buildings should satisfy the requirements of Policy D4 and the proposed height parameters informed and supported by detailed visual and technical impact analysis”. [Originally submitted in response to Neighbourhoods] 	
--	--	--	--	--	--	--	--	--	--	--	--

Reg18-K-020	Resident	Reg18-K-020/001	Neighbourhoods	N5 Canning Town and Custom House	N5.SA1 Canning Town East		Infrastructure requirements			<p>With respect to the planned proposals for Canning Town east. Page 347 makes a note that the 16 story buildings should be concentrated against the A13 stepping down to 7 and 9 story buildings. Edwin Street currently only has 2 story houses on it opposite the flats where I live. The concern is that even 7 or 9 story buildings will have a serious negative impact on the light coming into the homes on the bottom floors of the flats, especially as there is already a high rise flat in the area. [Originally submitted in response to Neighbourhoods]</p>	<p>This policy approach has now changed to ensure a consistent approach to referencing heights in Policy D4 and the Neighbourhood policies. Please see the new wording in Table 1: Tall Building Zones, TBZ13: Canning Town and N4.SA1 Canning Town East.</p> <p>Permissible maximum heights in the site allocation design principles have been referenced in meters and provide an indicative estimate of the number of stories which could be achieved for explanatory purpose only. Furthermore, N4.SA1 Canning Town East site allocation design principles require massing to step down to sensitively integrate with the low rise context to the east without referring to specific heights.</p> <p>Tall buildings locations identified in Policy D4 are key to delivering much needed homes. Indeed, Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need.</p> <p>Locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Due to its emerging context, its District Centre designation with a high level of public transport accessibility, and its capacity for growth within the Royal Docks & Beckton Riverside Opportunity Area, the N4.SA1 Canning Town East site allocation has been identified as a suitable area for tall buildings. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p> <p>However, Policy D4 together with other design policies will ensure that tall buildings will be of good quality design and</p>
-------------	----------	-----------------	----------------	----------------------------------	--------------------------	--	-----------------------------	--	--	--	--

												materiality, will respond to local context and will be better integrated with the surrounding. Furthermore, the impacts of overlooking and loss of privacy, overshadowing, and overbearing massing on neighbouring residential properties are addressed in Policy D6.3 and they will be assessed during the masterplanning and planning application process.
--	--	--	--	--	--	--	--	--	--	--	--	--

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Policy D9 part A requires boroughs to identify in their development plan what is considered a tall building for their specific localities but it states that tall building "should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey."</p> <p>In accordance with Policy D9 part A, and based on local context analysis, Newham has defined 21m (ca. 7 storeys) as the height at which buildings become substantially taller than its surroundings.</p> <p>Suitable locations for tall buildings have been identified based on an assessment of existing height, proximity to public transport, impact on open space and heritage assets. Due to its emerging context, its District Centre designation with a high level of public transport accessibility, and its capacity for growth within the Royal Docks & Beckton Riverside Opportunity Area, the Limmo site has been identified as a suitable area for tall buildings.</p> <p>Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth</p>									Resident	Reg18-K-035
	<p>Should not exceed 7 storeys. Anything above and you will have a similar depressing effect like in the Silvertown Way new development where you have shade most of the day</p> <p>[Originally submitted in response to Neighbourhoods]</p>			Design principles		N5.SA4 Limmo	N5 Canning Town and Custom House	Neighbourhoods	Reg18-K-035/002		Reg18-K-035

Comment Response	Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).
Comment	
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
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Due to its emerging context, its District Centre designation with a high level of public transport accessibility, and its capacity for growth within the Royal Docks & Beckton Riverside Opportunity Area, the Limmo site has been identified as a suitable area for tall buildings whilst enabling the continuation of the Leaway riverside walk. Without enabling development on this site, it is unlikely that the Council, TfL or the Mayor of London could afford to deliver the park and other requirements on the site. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>	<p>[Change it] I provide some examples. In order to protect the nature of the Limmo peninsula and to provide continuation of the Leaway riverside walk, it is not necessary to erect buildings 10 to 19 storeys high. You can achieve those objectives just by committing in creating a destination for the area which is in line with the nature conservation and the enhanced access to existing pedestrian and cycle routes (i.e. a park).</p> <p>[Originally submitted in response to Neighbourhoods]</p>		Design Principles		N5.SA4 Limmo	N5 Canning Town and Custom House	Neighbourhoods	Reg18-T-010/004	Resident	Reg18-T-010

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed to strengthen wording and considerations relating to noise impacts from the DLR and Jubilee line. Please see the new wording in the Design principles for the Limmo site allocation. Furthermore, the site mapping for the allocation has now changed to reflect the agent of change principle by mapping sensitive edges within the site allocation. Please see the new site allocation map for Limmo. This now maps the area containing the power lines as a sensitive edge within the site allocation.	[Change it] [Another thing that I find concerning is that we are thinking of building again another tall building when the are clearly suffers from long-standing issues such as: the ugly power lines that should have been addressed long time ago;] the noise generated by the Jubilee and DLR lines which generate many complaints per year against Newham and TfL (and that buildings on the Limmo Peninsula would make worse); [Originally submitted in response to Neighbourhoods]		D4		N5.SA4 Limmo	N5 Canning Town and Custom House	Neighbourhoods	Reg18-T-010/006	Resident	Reg18-T-010

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Due to its emerging context, its District Centre designation with a high level of public transport accessibility, and its capacity for growth within the Royal Docks & Beckton Riverside Opportunity Area, the Limmo site has been identified as a suitable area for tall buildings whilst enabling the continuation of the Leaway riverside walk. Without enabling development on this site, it is unlikely that the Council, TfL or the Mayor of London could afford to deliver the park and other requirements on the site. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>						N5 Canning Town and Custom House	Neighbourhoods	Reg18-T-010/009	Resident	Reg18-T-010

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Due to its emerging context, its District Centre designation with a high level of public transport accessibility, and its capacity for growth within the Royal Dock & Beckton Riverside Opportunity Area, the Limmo site has been identified as a suitable area for tall buildings whilst enabling the continuation of the Leaway riverside walk. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>						N5 Canning Town and Custom House	Neighbourhoods	Reg18-T-010/010	Resident	Reg18-T-010

Reg18-T-114	Resident	Reg18-T-114/010	Neighbourhoods	N5 Canning Town and Custom House			D4			<p>[Change it] and do not allow higher than 6 storeys buildings. [Originally submitted in response to Neighbourhoods]</p>	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Policy D9 part A requires boroughs to identify in their development plan what is considered a tall building for their specific localities but it states that tall building "should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey."</p> <p>In accordance to Policy D9 part A, and based on local context analysis, Newham has defined 21m (ca. 7 storeys) as the height at which buildings become substantially taller than its surrounding.</p> <p>Suitable locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets.</p> <p>Due to its emerging context, its District Centre designation with a high level of public transport accessibility, and its capacity for growth within the Royal Dock & Beckton Riverside Opportunity Area, Canning Town has been identified as a suitable area for tall buildings.</p> <p>Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>
-------------	----------	-----------------	----------------	----------------------------------	--	--	----	--	--	---	---

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Policy D9 part A requires boroughs to identify in their development plan what is considered a tall building for their specific localities but it states that tall building "should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey."</p> <p>In accordance with Policy D9 part A, and based on local context analysis, Newham has defined 21m (ca. 7 storeys) as the height at which buildings become substantially taller than its surrounding.</p> <p>Suitable locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Due to its emerging context, its District Centre designation with a high level of public transport accessibility, and its capacity for growth within the Royal Docks & Beckton Riverside Opportunity Area, the Limmo site has been identified as a suitable area for tall buildings.</p> <p>Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth</p>						N5 Canning Town and Custom House	Neighbourhoods	Reg18-T-114/013	Resident	Reg18-T-114

Comment Response	Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).
Comment	
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
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Policy D9 part A requires boroughs to identify in their development plan what is considered a tall building for their specific localities but it states that tall building "should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey."</p> <p>In accordance with Policy D9 part A, and based on local context analysis, Newham has defined 21m (ca. 7 storeys) as the height at which buildings become substantially taller than its surrounding.</p> <p>Suitable locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Due to its emerging context, its District Centre designation with a high level of public transport accessibility, and its capacity for growth within the Royal Docks & Beckton Riverside Opportunity Area, the Limmo site has been identified as a suitable area for tall buildings.</p> <p>Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth</p>						N5 Canning Town and Custom House	N5 Canning Town and Custom House	N5.SA5 Canning Town Riverside		Reg18-T-114

Comment Response	Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).
Comment	
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
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as, whilst we acknowledge that pre-application discussions have been held with LBN officers, and that the applicant could benefit from planning consent under the current Local Plan, the discussions are informed by the adopted Local Plan. The draft emerging Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context.</p> <p>Based on the methodology used to identify suitable locations and heights for tall buildings across the borough, N4.SA4 Limmo is not considered appropriate for a 100m Tall Building Zone designation. The maximum permissible height seeks to preserve the spatial hierarchy aspiration for the borough and Canning Town area. More details on the methodology used to identify suitable locations and height for tall buildings can be found in the Tall Building Annex (2024). However, this policy approach has now changed to ensure a consistent approach to referencing heights in Policy D4 and the Neighbourhood policies. Please see the new wording in Table 1: Tall Building Zones, TBZ13: Canning Town and N5.SA4 Limmo site allocation.</p>	<p>Design Principles</p> <p>The proposed site allocation sets out that on the Limmo peninsula, building heights should range between 10 and 19 storeys, with taller buildings concentrated adjacent to the railway line and open space.</p> <p>TTLP have undertaken a design-led approach to the preparation of the masterplan, identifying the site constraints and responding to these as well as the existing and emerging design, height, scale and massing of the local context. Throughout the extensive pre-application discussions which have taken place with officers at LBN, it is recognised that tall buildings are suitable on the Limmo site, subject to adhering to height limits set by aviation constraints associated with City Airport. <u>The emerging masterplan has incorporated buildings of c.30 storeys in height, which we consider should be incorporated in the Design Principles of the site allocation.</u> More details commentary on the appropriateness of the tall building zones and associated heights is considered in Section X below [no section x, see instead comment above regarding policy D4].</p> <p>[Originally submitted in response to Neighbourhoods]</p>		Design Principles		N5.SA4 Limmo	N5 Canning Town and Custom House	Neighbourhoods	Reg18-E-080/047	Transport Trading Limited Properties Limited	Reg18-E-080

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as, based on the methodology used to identify suitable locations and heights for tall buildings, N4.SA4 Limmo is not considered appropriate for a 100m Tall Building Zone designation. The maximum permissible height seeks to preserve the spatial hierarchy aspiration of the plan.</p> <p>More details on the methodology used to identify suitable locations and height for tall buildings can be found in the Tall Building Annex (2024).</p> <p>However, this policy approach has now changed to ensure a consistent approach to referencing heights in Policy D4 and the Neighbourhood policies. Please see the new wording in Table 1: Tall Building Zones, TBZ13: Canning Town and N4.SA4 Limmo site allocation.</p>	<p>[Conclusion In summary, TTLP:] - Consider that Limmo is suitable for the delivery of tall buildings of up to 30 storeys in height, as demonstrated through the analysis provided by Montagu Evans.</p> <p>[Originally submitted in response to Neighbourhoods]</p>		Design Principles		N5.SA4 Limmo	N5 Canning Town and Custom House	Neighbourhoods	Reg18-E-080/053	Transport Trading Limited Properties Limited	Reg18-E-080
	Comment noted.					N7.SA1 Abbey Mills	N7 Three Mills	Neighbourhoods	Reg18-E-097/017	Lee Valley Regional Park Authority	Reg18-E-097

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-097	Lee Valley Regional Park Authority	Reg18-E-097/018	Neighbourhoods	N7 Three Mills	N7.SA1 Abbey Mills		Design principles			Guidance set out for the Abbey Mills site proposes building heights of 6 to 12 storeys stepping down towards the west to manage the impact on heritage assets. This is supported although clearly the overall design and placement of buildings will have to be sensitively planned given the need to retain views of the Abbey Mills Pumping Station Grade II* and the wider heritage features of the area specifically those on Three Mills Island. [Originally submitted in response to Neighbourhoods]	This policy approach has now changed. A reference to the importance of conserving and enhancing the significance of heritage assets and the reference to the relevant Character Appraisal and Management Plans have been included. The wording of Policy D4 and relevant site allocation design principles have been changed to clarify how development proposals of tall buildings in proximity to sensitive areas should respond to the historic environment and manage the transition between conserve and transform areas. Please see the new wording in Table 1: Tall Building Zones, implementation text D4.3 and relevant site allocations, including N7.SA1 Abbey Mills.
Reg18-E-097	Lee Valley Regional Park Authority	Reg18-E-097/019	Neighbourhoods	N7 Three Mills	N7.SA2 Parcellor e		Design principles			There is greater concern regarding the Parcel Force site where guidance currently proposes building heights in a range from 3 to 30 storeys, although the guidance also suggests the buildings should step down towards the listed gasholders. The Authority would wish to see the guidance specify a set back from the riverside edge on the western side of the site, which is opposite a linear extension to the Regional Park along the River Lee Navigation towpath, and that building heights should not block or interrupt views through the site to the Clock House Grade II and House Mill Grade 1 listed. [Originally submitted in response to Neighbourhoods]	This policy approach has now changed to ensure the impact of tall buildings on watercourse and open spaces are considered in line with policies GWS2 and GWS3, which are requiring development proposals for tall buildings to demonstrate consideration of the impact on biodiversity, existing and proposed public open space, including watercourses. Furthermore, a reference to the importance of conserving and enhancing the significance of heritage assets and the reference to the relevant Character Appraisal and Management Plans have been included. The wording of Policy D4 and relevant site allocation design principles has been changed. Please see the new wording in TBZ15: West Ham Station, implementation text D4.3 and N7.SA2 Twelvetreves Park and

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Former Bromley By Bow Gasworks site allocation.										
	This policy approach has now changed. A reference to the importance of conserving and enhancing the significance of heritage assets and the reference to the relevant Character Appraisal and Management Plans have been included. The wording of Policy D4 and relevant Site Allocation design principles have been changed to clarify how development proposals of tall buildings in proximity to sensitive areas should respond to the historic environment and manage the transition between conserve and transform areas. Please see the new wording in Table 1: Tall Building Zones, TBZ16: Abbey Mills, implementation text D4.3 and N7.SA1 Abbey Mills site allocation.	Building hieghts should be kept to the bare minimum in order to maintian the visibility of the Pump house and local heritage buildings. 10 storeys is within that range. [Originally submitted in response to Neighbourhoods]		Developm ent principles		N7.SA1 Abbey Mills	N7 Three Mills	Neigh bourh oods	Reg18-K-028/005	London Markaz Abbey Mills Trust Land	Reg18-K-028

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Policy D9 part A requires boroughs to identify in their development plan what is considered a tall building for their specific localities but it states that tall building "should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey."</p> <p>In accordance to Policy D9 part A, and based on local context analysis, Newham has defined 21m (ca. 7 storeys) as the height at which buildings become substantially taller than its surroundings.</p> <p>Suitable locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Due to its Local Centre designation, in a transform area with a high level of accessibility, N7.SA2 Parcelforce is considered suitable to accommodate tall building developments. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable</p>	<p>no need for another 30-storey building. Max 6 storeys</p> <p>[Originally submitted in response to Neighbourhoods]</p>		Design principles		N7.SA2 Parcelforce	N7 Three Mills	Neighbourhoods	Reg18-K-035/001	Resident	Reg18-K-035

Comment Response	
	locations for tall buildings can be found in the Tall Building Annex (2024).
Comment	
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
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Policy D9 part A requires boroughs to identify in their development plan what is considered a tall building for their specific localities but it states that tall building "should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey."</p> <p>In accordance to Policy D9 part A, and based on local context analysis, Newham has defined 21m (ca. 7 storeys) as the height at which buildings become substantially taller than its surroundings.</p> <p>Suitable locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Due to its Local Centre designation, in a transform area with a high level of accessibility, N7.SA1 Abbey Mills is considered suitable to accommodate tall building developments</p> <p>Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable</p>	again max 6 storeys and maximise green space					Design principles			Resident	Reg18-K-035
							N7.SA1 Abbey Mills	N7 Three Mills	Neighbourhoods	Reg18-K-035/003	

Comment Response	locations for tall buildings can be found in the Tall Building Annex (2024).
Comment	
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
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as, whilst we acknowledge that consent have been granted with tall elements at greater heights than the heights allowed within the tall building zone designation in the emerging local plan and that the site could still benefit from these consents, these consents were permitted under the adopted Local Plan.</p> <p>The draft emerging Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough wide spatial hierarchy, create a gradual and sensitive transition to the surrounding context.</p> <p>However, this policy approach has now changed to ensure a consistent approach to referencing heights in Policy D4 and the Neighbourhood policies. Please see the new wording inTBZ15: West Ham Station and N7.SA2 Twelvetrees Park and Former Bromley By Bow Gasworks site allocation.</p>	<p>As currently drafted, building heights are required to be between 3 and 30 storeys with the greatest height intended to be at the eastern end of the Site stepping down towards the gasholder. This is not reflective of the Twelvetrees Park site planning permission which allows for buildings in excess of 30 storeys at both the eastern and western end of the Twelvetrees Park site. Proposed policy wording change: Building heights should <u>reflect the Site's location within a Tall Building Zone and should be subject to a design led approach that could range from 3 to 35 storeys, range from 3 to 30 storeys, with the greatest height accommodated in the east of the site stepping down towards the gasholders.</u></p> <p>[Originally submitted in response to Neighbourhoods]</p>		Design principles		N7.SA2 Parcelforce	N7 Three Mills	Neighbourhoods	Reg18-E-136/278	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
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as, whilst we acknowledge that consent have been granted with tall elements at greater heights than the heights allowed within the tall building zone designation in the emerging local plan and that the site could still benefit from these consents, these consents were permitted under the adopted Local Plan.</p> <p>The draft emerging Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough wide spatial hierarchy, create a gradual and sensitive transition to the surrounding context.</p> <p>However, this policy approach has now changed to ensure a consistent approach to referencing heights in Policy D4 and the Neighbourhood policies. Please see the new wording inTBZ15: West Ham Station and N7.SA2 Twelvetreets Park and Former Bromley By Bow Gasworks site allocation.</p>	<p>Given the Site's location within an opportunity area and in close proximity to a number of transport interchanges, flexibility should be built into the policy for further height in line with recent applications and to reflect the site's opportunity to deliver a significant number of new homes including affordable homes.</p> <p>[Originally submitted in response to Neighbourhoods]</p>		Design principles		N7.SA2 Parcelforce	N7 Three Mills	Neighbourhoods	Reg18-E-136/279	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
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”.</p> <p>Based on the sieving exercise to identify tall building locations and maximum heights, N7.SA2 Twelvetrees Park and Former Bromley By Bow Gasworks is considered appropriate to accommodate tall building developments.</p> <p>However, whilst we acknowledge that the impact of tall buildings will be assessed during the masterplanning and the planning application process, Policy D4 and the maximum permissible heights, in conjunction with other design policies, seeks to protect the listed Gasholders and the role they play in placemaking.</p> <p>The wording of Policy D4 and relevant site allocation design principles has been changed to clarify how development proposals of tall buildings in proximity to sensitive areas should respond to the historic environment and manage the transition between conserve and transform areas. Please see the new wording in Table 1: Tall Building Zones, TB15: West Ham Station and</p>			Design principles		N7.SA2 Parcelforce	N7 Three Mills	Neighbourhoods	Reg18-E-136/280	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136

Comment Response	N7.SA2 Twelvetrees Park and Former Bromley By Bow Gasworks.
Comment	
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
	<p>This policy approach has now changed to ensure a consistent approach to referencing heights in Policy D4 and the Neighbourhood policies. Please see the new wording in Table 1: Tall Building Zones, TBZ15: West Ham Station and N7.SA2 Twelvetrees Park and Former Bromley by Bow Gasworks design principles.</p> <p>The change you have suggested has not resulted in a change as we did not consider this change to be appropriate as, based on the sieving exercise to identify tall building locations and maximum heights, due to its local centre designation and its close proximity to the Three Mills conservation area, N7.SA2 Twelvetrees Park and Former Bromley by Bow Gasworks is not considered an appropriate location to accommodate greater heights. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>	<p>If heights need to be included they should be updated to reflect a range between 3 and 35 storeys as a guide. Proposed policy wording change: Building heights should <u>reflect the Site's location within a Tall Building Zone and should be subject to a design led approach that could range from 3 to 35 storeys.</u>range from 3 to 30 storeys, with the greatest height accommodated in the east of the site stepping down towards the gasholders.</p> <p>{Originally submitted in response to Neighbourhoods}</p>		Design principles		N7.SA2 Parcellforce	N7 Three Mills	Neighbourhoods	Reg18-E-136/281	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
	A change to this policy approach has not been made. We did not consider this change to be appropriate as, whilst we acknowledge that the impact of tall buildings will be assessed during the masterplanning and the planning application process, Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).					N7.SA2 Parcelforce	N7 Three Mills	Neighbourhoods	Reg18-E-136/282	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136
	A change to this policy approach has not been made. We did not consider this change to be necessary because the Tall Building Zone designations are referenced in the Neighbourhood Policy where necessary and the maximum height - expressed in meters – in each site allocations aligns with Policy D4.					N7.SA2 Parcelforce	N7 Three Mills	Neighbourhoods	Reg18-E-136/289	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
	<p>Comment noted. The information you provided has been reviewed but it hasn't resulted in a change.</p> <p>We did not consider this change to be appropriate as the feasibility study you have provided shows how greater heights will create a plot that is not in synergy with the grain and density of what it has already been built in Sugar House Lane. As highlighted in the N7.SA3 Sugar House Lane design principles, the design and layout of plot MU3 should complete the rest of the site, following the same scale and character and preserve the identity of the island as a whole.</p> <p>We acknowledge that consent has been granted to the remaining Plot MU3 to be developed in Sugar House Island and that the site can still benefit from the existing consent. The permitted heights align with the maximum permissible heights outlined in the tall building zone in the emerging Local Plan.</p> <p>More details on the methodology used to identify suitable locations and height for tall buildings can be found in the Tall Building Annex (2024).</p> <p>However, the wording has been changed to reflect comments on the development principles and design principles. Please see the new wording in Table 1: Tall Building Zones, TBZ18: Stratford High Street and</p>			Design principles		N7.SA3 Sugar House Island	N7 Three Mills	Neighbourhoods	Reg18-E-055/003	Vasint BV	Reg18-E-055

Comment Response	relevant site allocation N7.SA3 Sugar House Island.
Comment	
Implementation	
Justification	
Clause	
Introduction	
Site allocation	
Policy	
Chapter	
Comment Reference	
Representor	
Representation Reference	

Reg18-E-108	Bellway Homes Limited	Reg18-E-108/017	Neighbourhoods	N8 Stratford and Maryland	N8.SA9 Pudding Mill		Design principles			<p>Heights</p> <p>The draft allocation notes that “building heights should be between 5 – 15 storeys”. Looking at the immediate context of the site, there is a varying degree of heights surrounding, of particular note is Sky View Tower which reaches 35 storeys. The site is a largely vacant, post-industrial island which benefits greatly from strategic connections and access to riverside amenity. The site is also allocated as falling within tall building zone TBZ18 under Policy D4 which allocates the site as being capable of accommodating taller buildings. The planning history across the area details permissions ranging from 8-23 storeys including land at PDZ8 to the east, with the neighbouring Vulcan Wharf site (ref. 22/00384/FUL) currently seeking permission for 20 storeys. Furthermore, in accordance paragraph 119 of the NPPF, the use of brownfield land should be optimised to make an effective use of land in meeting the needs for homes. There needs to be a consistent approach regarding height which can be accommodated with the flexibility of the amended wording below, this is a key brownfield area, which is largely uncompromised and offers a significant opportunity for much needed housing, therefore height should not be capped. Footnote 30 of the NPPF Prospectus which is out for consultation sets out “brownfield and other under-utilised urban sites should be prioritised, and on these sites density should be optimised to promote the most efficient use of land” Whilst this is only out for consultation it is clear guidance that</p>	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as, based on the sieving exercise to identify tall building locations and maximum heights, N8.SA9 Pudding Mill site allocation is not considered an appropriate location to accommodate greater heights. The maximum permissible height seeks to preserve the spatial hierarchy aspiration of the plan and a gradual transition to the surrounding context.</p> <p>More details on the methodology used to identify suitable locations and height for tall buildings can be found in the Tall Building Annex (2024).</p> <p>However, the wording has been changed to reflect comments on the development principles and design principles. Please see the new wording in Table 1: Tall Building Zones, TBZ18: Stratford High Street and relevant site allocations including N8.SA9 Pudding Mill.</p>
-------------	-----------------------	-----------------	----------------	---------------------------	---------------------	--	-------------------	--	--	---	---

										<p>brownfield plays an important role in ensuring that homes are built in the right places. Therefore, Bellway believe that the site has the capacity to accommodate greater height, along primary vehicular routes in particular where there would be no negative impact on residential amenity or the surrounding land, for example over the railway line. This will allow the site to assimilate with the existing nearby context to the south on Stratford High Street. The following amendment is proposed: "Building heights could extend up to 20 storeys."</p> <p>[Originally submitted in response to Neighbourhoods]</p>	
--	--	--	--	--	--	--	--	--	--	--	--

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. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Due to its emerging context, high public transport accessibility and its Metropolitan Centre designation TBZ19: Stratford Central has been identified as the area of maximum height in the Borough, with opportunities for tall elements up to 100m. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).						N8 Stratford and Maryland	Neighbourhoods	Reg18-K-016/017	Cllr James Beckles	Reg18-K-016
	Support noted. However, N8.SA10 Chobham Farm North falls within the TBZ20: Chobham Manor / East Village which sets the maximum height permitted in the defined area which should not be exceeded.						N8.SA10 Chobham Farm North	Neighbourhoods	Reg18-E-068/032	Hollybrook Homes	Reg18-E-068

Reg18-E-105	IQL South	Reg18-E-105/003	Neighbourhoods	N8 Stratford and Maryland	N8.SA5 Stratford Town Centre West		Design principles			<p>The remaining plots to be developed in IQL South benefit from existing consents to build up to 100m AOD on Plots S2 and S3 (under the SC OPP) and 80m AOD on Plot S10 (S10 Outline Planning Permission ref: 20/00146/OUT). A further detailed planning application on Plot S1/S11 received resolution to grant in May 2022 for buildings up to 129m (ref: 21/00416/FUL).</p>	<p>This policy approach has now changed following further analysis undertaken and outlined in the Tall Buildings Annex (2024). Through this analysis it was concluded that the 100 m zone could be extended to continue the consolidated clusters around IQL South and Cherry Park which align with the spatial hierarchy and objectives of the new Local Plan. Please see the new wording in TBZ19: Stratford Central and relevant site allocation N8.SA5 Stratford Town Centre West.</p> <p>Whilst we acknowledge that consents have been granted to the remaining plots to be developed in IQL South with tall elements at greater heights than the heights allowed within the tall building zone designation, and that the sites can still benefit from these consents, these consents were permitted under the adopted LLDC Local Plan. The draft emerging Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context.</p> <p>While we have taken into consideration your information our conclusion remains that, in line with the methodology used to identify suitable locations and heights for tall buildings across the borough, the remaining plot S10 and plot S1 are not considered appropriate for greater heights. The maximum permissible heights seek to preserve the spatial hierarchy aspiration for the borough and Stratford Area. More details on the methodology used to identify suitable locations and heights for tall buildings can be found in the Tall Building Annex (2024).</p>
-------------	-----------	-----------------	----------------	---------------------------	-----------------------------------	--	-------------------	--	--	---	---

Reg18-E-105	IQL South	Reg18-E-105/044	Neighbourhoods	N8 Stratford and Maryland	N8.SA5 Stratford Town Centre West		Design principles			<p>However, as stated in response to Policy D4, the design principles should reflect the existing consents covering the area and IQL South specifically, which have not been considered in the setting of Tall Building Zones.</p> <p>[Originally submitted in response to Neighbourhoods]</p>	<p>This policy approach has now changed following further analysis undertaken and outlined in the Tall Buildings Annex (2024). Through this analysis it was concluded that the 100 m zone could be extended to continue the consolidated clusters around IQL South and Cherry Park which align with the spatial hierarchy and objectives of the new Local Plan. Please see the new wording in TBZ19: Stratford Central and relevant site allocation N8.SA5 Stratford Town Centre West.</p> <p>Whilst we acknowledge that consents have been granted to the remaining plots to be developed in IQL South with tall elements at greater heights than the heights allowed within the tall building zone designation, and that the sites can still benefit from these consents, these consents were permitted under the adopted LLDC Local Plan. The draft emerging Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context.</p> <p>While we have taken into consideration your information our conclusion remains that, in line with the methodology used to identify suitable locations and heights for tall buildings across the borough, the remaining plot S10 and plot S1 are not considered appropriate for greater heights. The maximum permissible heights seek to preserve the spatial hierarchy aspiration for the borough and Stratford Area. More details on the methodology used to identify suitable locations and height for tall buildings can be found in the Tall Building Annex (2024).</p>
-------------	-----------	-----------------	----------------	---------------------------	-----------------------------------	--	-------------------	--	--	--	--

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted.	[attachments showing parameter plans] [Originally submitted in response to Neighbourhoods]		Design principles		N8.SA5 Stratford Town Centre West	N8 Stratford and Maryland	Neighbourhoods	Reg18-E-105/046	IQL South	Reg18-E-105
	This policy approach has now changed to ensure a consistent approach to referencing heights in Policy D4 and the Neighbourhood policies. Please see the new wording in Table 1: Tall Building Zones, TBZ19: Stratford Central and relevant N8.SA2 Stratford Station design principles.	N8 SA2 Stratford Station. The inclusion of this site allocation is welcomed, as is the inclusion of the principles from the Stratford Station Design Framework. However, the site allocation specifically refers to a maximum tall buildings height limit of 32m, which is inconsistent with draft Policy D4 which allows for some buildings in this area to be designed to a maximum height of 100m. The site allocation should be amended to reflect this approach, which would be consistent with the UDF and its intention to maximise the potential for contributing to the station project and to the offer of Stratford as a Metropolitan Centre. [Originally submitted in response to Neighbourhoods]		Design principles		N8.SA2 Stratford Station	N8 Stratford and Maryland	Neighbourhoods	Reg18-E-052/042	London Legacy Development Corporation	Reg18-E-052

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to ensure a consistent approach to referencing heights in Policy D4 and the Neighbourhood policies. Please see the new wording in Table 1: Tall Building Zones and relevant site allocations including N8.SA9 Pudding Mill. The change you have suggested has not resulted in a change. We did not consider this change to be necessary as, whilst we acknowledge that consents have been granted with tall elements at greater heights than the heights allowed within the tall building zone designation in the emerging local plan and that the site could still benefit from these consents, these consents were permitted under the adopted LLDC Local Plan.</p> <p>The draft emerging Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough wide spatial hierarchy, avoid the scattered composition of tall buildings developed in the past years around Stratford and create a gradual and sensitive transition to the surrounding context. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>			Design principles		N8.SA9 Pudding Mill	N8 Stratford and Maryland	Neighbourhoods	Reg18-E-052/050	London Legacy Development Corporation	Reg18-E-052

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to ensure a consistent approach to referencing heights in Policy D4 and the Neighbourhood policies. Please see the new wording in Table 1: Tall Building Zones and relevant site allocations including N8.SA9 Pudding Mill. The change you have suggested has not resulted in a change. We did not consider this change to be necessary as, whilst we acknowledge that consents have been granted with tall elements at greater heights than the heights allowed within the tall building zone designation in the emerging local plan and that the site could still benefit from these consents, these consents were permitted under the adopted LLDC Local Plan.</p> <p>The draft emerging Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough wide spatial hierarchy, avoid the scattered composition of tall buildings developed in the past years around Stratford and create a gradual and sensitive transition to the surrounding context. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>						N8 Stratford and Maryland	Neighbourhoods	Reg18-E-052/189	London Legacy Development Corporation	Reg18-E-052

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to ensure a consistent approach to referencing heights in Policy D4 and the Neighbourhood policies. Please see the new wording in Table 1: Tall Building Zones, TBZ18: Stratford High Street and N8.SA7 Rick Roberts Way design principles.</p> <p>The wording you have suggested has not resulted in a change as we did not consider this change to be necessary as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”.</p> <p>Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>						N8 Stratford and Maryland	Neighbourhoods	Reg18-E-136/302	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
	<p>This policy approach has now changed to ensure a consistent approach to referencing heights in Policy D4 and the Neighbourhood policies. Please see the new wording in Table 1: Tall Building Zones, TBZ18: Stratford High Street and N8.SA7 Rick Roberts Way design principles.</p> <p>The change you have suggested has not resulted in a change as we did not consider this change to be necessary as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum heights that could be acceptable”.</p> <p>Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>						N8 Stratford and Maryland	Neighbourhoods	Reg18-E-136/303	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
	The proposed building heights as currently drafted are considered to be substantially lower than the emerging context for this neighbourhood which at Stratford High Street has buildings extending up to 43 storeys in height. [Originally submitted in response to Neighbourhoods]			Design principles		N8.SA7 Rick Roberts Way	N8 Stratford and Maryland	Neighbourhoods	Reg18-E-136/304	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136
	This policy approach has not changed. We did not consider this change to be appropriate as, based on the sieving exercise to identify tall building locations and maximum heights, N8.SA7 Rick Roberts Way is not considered an appropriate location to accommodate the greatest height within the TBZ18: Stratford High Street. The maximum permissible heights seek to set and preserve a borough wide spatial hierarchy, avoid the scattered composition of tall buildings developed in the past years around Stratford and create a gradual and sensitive transition to the surrounding context. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).										
	5 - 15 storeys quite a varied number [Originally submitted in response to Neighbourhoods]			Design principles		N8.SA10 Chobham Farm North	N8 Stratford and Maryland	Neighbourhoods	Reg18-As-001/015	Stratford and West Ham Assembly	Reg18-As-001
	Need to make the height transition work to the low rise [Originally submitted in response to Neighbourhoods]			Design principles		N8.SA10 Chobham Farm North	N8 Stratford and Maryland	Neighbourhoods	Reg18-As-001/018	Stratford and West Ham Assembly	Reg18-As-001
	This policy approach has now changed to ensure a consistent approach to referencing heights in Policy D4 and the Neighbourhood policies. Please see the new wording in Table 1: Tall Building Zones, TBZ20: Chobham Manor / East Village and N8.SA10 Chobham Farm North site allocation.										
	This policy approach has now changed to ensure a consistent approach to referencing heights in Policy D4 and the Neighbourhood policies. Please see the new wording in Table 1: Tall Building Zones, TBZ20: Chobham Manor / East Village and N8.SA10 Chobham Farm North site allocation.										

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	London Plan (2021) Policy D9 sets out a comprehensive list of criteria for tall buildings to meet. The impact of tall buildings has been taken into consideration and addressed in the Policy D4.3. Furthermore, the impacts of overlooking and loss of privacy, overshadowing, and overbearing massing on neighbouring residential properties are addressed in Policy D6.3 and they will be assessed during the masterplanning and planning application process. N8.SA10 Chobham Farm North site allocation design principles give more guidance on design aspects and require massing to step down towards Leyton Road to sensitively integrate with the low rise context of the travellers site.					N8.SA10 Chobham Farm North	N8 Stratford and Maryland	Neighbourhoods	Reg18-As-001/022	Stratford and West Ham Assembly	Reg18-As-001
	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy D4, TBZ19: Stratford Central and implementation text D4.2 respectively state "All tall buildings must consider the cumulative impact with existing tall buildings to avoid saturating the skyline." and "New tall buildings should be below established heights [...]".			2			N8 Stratford and Maryland	Neighbourhoods	Reg18-As-001/150	Stratford and West Ham Assembly	Reg18-As-001
	Height impact on the traveller site could be substantial [Originally submitted in response to Neighbourhoods]							Design principles			
	[Change] Change height of skyline esp along high street [Originally submitted in response to Neighbourhoods]										

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This wording change has not been made. We did not consider this change to be necessary as protection and enhancement of heritage assets and their setting is imbedded in a number of policies across the Plan, including policy D10 (Designated and non-designated heritage assets) which protects listed buildings, and policy D2 (Public Realm Net Gain) which supports provision of heritage information boards and other forms of heritage activation through the public realm. However, the Site Allocation N8.SA1 Stratford Central has changed as we wanted to highlight the need to specifically address the building on the Heritage at Risk register (published by Historic England) as part of the masterplanning of the site. Please see the new wording in Policy N8.						N8 Stratford and Maryland	Neighbourhoods	Reg18-As-001/183	Stratford and West Ham Assembly	Reg18-As-001

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024). Alongside delivering homes, the Local Plan also secures funding and land for the delivery of new infrastructure including new parks, health centres and schools. More details about where these will be located is in policy BFN1 and the neighbourhoods chapter.</p>									Stratford and West Ham Assembly	Reg18-As-001

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed to ensure a consistent approach to referencing heights in Policy D4 and the Neighbourhood policies. Please see the new wording in Table 1: Tall Building Zones, TBZ19: Stratford Central and relevant site allocations.			Design principles		N8.SA2 Stratford Station	N8 Stratford and Maryland	Neighbourhoods	Reg18-E-107/002c	Stratford City Business District Limited	Reg18-E-107
	This policy approach has not changed. We did not consider this change to be appropriate as, based on the sieving exercise to identify tall building locations and maximum heights, the site is not considered an appropriate location to accommodate the greatest height within TBZ19: Stratford Central. The maximum permissible heights seek to preserve the spatial hierarchy aspiration of the plan and a gradual transition to the surrounding context. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).			Design principles		N8.SA2 Stratford Station	N8 Stratford and Maryland	Neighbourhoods	Reg18-E-107/003	Stratford City Business District Limited	Reg18-E-107

Comment Response	
Comment	<p>which would not only improve the contribution the Site could make to the overall station project but would also make the best use of a highly accessible brownfield site.</p> <p>[Originally submitted in response to Neighbourhoods]</p>
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
	<p>This policy approach has now changed following further analysis undertaken and outlined in the Tall Buildings Annex (2024). Through this analysis it was concluded that the 100 m zone could be extended to continue the consolidated cluster around Cherry Park which aligns with the spatial hierarchy and objectives of the new local plan. Please see the new wording in Table 1: Tall Building Zones, TBZ19: Stratford Central and N8.SA5 Stratford Town Centre West. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>	<p>Furthermore, given Newham's significant housing need and the objectives of other parts of the draft Plan to optimise highly accessible Sites like this, in a Metropolitan Town Centre (with International Centre aspirations), the proposed height limit of 60m would overly constrain the opportunity that the Site presents.</p> <p>Given the conclusions of the Newham Characterisation Study that the Site is not in a location that is highly sensitive to development of tall buildings and indeed that it is in a location identified for transformation, the draft Plan's approach to TBZ maximum building heights should be re-considered. We request further discussions are held with LBN officers to agree on an appropriate maximum building height for the Site and SCE, given the opportunity for town centre intensification and housing delivery.</p> <p>Recommendation 2: That discussions are held with LBN officers to agree on an appropriate maximum building height within the TBZ, for the Site and the wider SCE.</p> <p>[Originally submitted in response to Neighbourhoods]</p>		Design principles		N8.SA5 Stratford Town Centre West	N8 Stratford and Maryland	Neighbourhoods	Reg18-E-102/009	Unibail-Rodamco-Westfield	Reg18-E-102

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to ensure a consistent approach to referencing heights in Policy D4 and the Neighbourhood policies and to limit any reference to specific heights on areas subject to tall building designation. Please see the new wording in Table 1: Tall Building Zones and relevant site allocations, including N8.SA4 Stratford High Street Bingo Hall.</p> <p>However, N8.SA4 Stratford High Street Bingo Hall site allocation design principles require massing to step down towards the southern and eastern part of the site to sensitively integrate with the prevailing height of the site's context to protect the impact that tall building developments could have on the Stratford St John's Conservation Area.</p>						N8 Stratford and Maryland	Neighbourhoods	Reg18-E-119/052	Unite Group plc	Reg18-E-119
	<p>This policy approach has now changed to ensure a consistent approach to referencing heights in Policy D4 and the Neighbourhood policies. Please see the new wording in Table 1: Tall Building Zones and relevant site allocations.</p>	<p>Our second point relates to the proposed building heights within strategic allocation and how this relates to draft Policy D4 Tall Buildings. Draft site allocation N8.SA1 states, "building heights should range from 5-18 storeys and provide suitable transitions to the conservation area and heritage assets. Tall buildings should be located in the Tall Building Zone".</p> <p>Draft Policy D4 defines tall buildings as those at or over 21m (roughly seven storeys). First and foremost, the Council should refer to height in draft site allocation N8.SA1 in metres rather than storeys. This would align with draft Policy</p>					N8 Stratford and Maryland	Neighbourhoods	Reg18-E-026/008	Wm Morrison Supermarkets Ltd	Reg18-E-026

Comment Response	
Comment	D4. [Originally submitted in response to Neighbourhoods]
Implementation	
Justification	
Clause	
Introduction	
Site allocation	
Policy	
Chapter	
Comment Reference	
Representor	
Representation Reference	

Reg18-E-026	Wm Morrison Supermarkets Ltd	Reg18-E-026/009	Neighbourhoods	N8 Stratford and Maryland	N8.SA1 Stratford Central		Design principles		<p>Secondly, the Tall Building Zone (TBZ) that partially covers draft site allocation N8.SA1 is referred to as TBZ19 and encompasses the area between Great Eastern Road, Broadway and The Grove. This TBZ also extends to the north-east of Stratford covering Westfield and Stratford International Station. Draft Policy DB4 (TBZ19) considers this TBZ appropriate for buildings ranging between 60m and 100m and [up to] 32m in defined areas of the Tall Building Zone. This more restrictive 32m limit would apply to the sensitive edge of the Broadway to allow for limited tall building elements. However, it is noted that the prevailing height along this sensitive edge should be between 9m and 21m. It is likely that this area that fronts on the Broadway is considered sensitive due to it intertwining with the Stratford St Johns Conservation Area. [A supporting image is provided within the comment]</p> <p>However, the same could be said for the frontage on the opposite side of The Grove (e.g. the Ibis Hotel and Stratford Library) which is also included in the Conservation Area designation but excluded from the proposed Tall Building Zone. The Morrisons site to the rear which is further away from the Conservation Area is also excluded. This suggests that height across the entirety of the Morrisons site cannot exceed 21m because it is not within a Tall Building Zone. We consider this to be a wasted opportunity to significantly increase height and density to deliver much needed housing and enhance commercial prospects on what is a</p>	<p>This policy approach has now changed following further analysis undertaken and outlined in the Tall Buildings Annex (2024). Through this analysis it was concluded that the 32 m zone could be extended on the eastern side of the TBZ19: Stratford Central, which has the same sensitivity and suitability to tall buildings development of the western part of the tall building zone, whilst preserving the spatial hierarchy and objectives of the new local plan and the sensitive transition to a low rise context to the east.</p> <p>More details on the methodology used to identify suitable locations and height for tall buildings can be found on the Tall Building Annex (2024).</p> <p>Please see the new wording in Policy D4, TBZ19: Stratford Central and relevant site allocations.</p>
-------------	------------------------------	-----------------	----------------	---------------------------	--------------------------	--	-------------------	--	--	---

										<p>relatively low density and sparse site in the Stratford Metropolitan Centre. Therefore, to improve the density prospects of the Morrisons site, the TBZ should be extended to cover the area to the east of The Grove. For example, the more restrictive 32m zone could be introduced along the frontage of the eastern side of The Grove to mirror the proposed heights on the western side, whilst allowing an increase in height towards the centre of the Morrisons site and boundary with Sarah Bonnell School. It is noted that other TBZs allow for up to 40m and 50m, which could be deemed more appropriate than 60m to mark the transition from the centre of Stratford.</p> <p>[Originally submitted in response to Neighbourhoods]</p>	
--	--	--	--	--	--	--	--	--	--	---	--

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted.	<p>We have also reviewed the Stratford St Johns Conservation Area Character Appraisal and Management Proposals (March 2019) which characterises the Morrisons car park as a large and visually unsatisfactory break in the townscape. This statement is accompanied by the townscape analysis map which recognises the western boundary of the Morrisons site as having a negative impact. We consider that our suggested approach for a TBZ covering the Morrisons site and eastern frontage of The Grove would align with the findings of this document.</p> <p>[Originally submitted in response to Neighbourhoods]</p>		Design principles		N8.SA1 Stratford Central	N8 Stratford and Maryland	Neighbourhoods	Reg18-E-026/010	Wm Morrison Supermarkets Ltd	Reg18-E-026

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	In addition, Morrisons consider that there is an opportunity to significantly increase height and density across the site. Morrisons encourage the Council to include the site, along with the eastern frontage of the Grove, to be included within TBZ19 to prevent heights being limited to no more than 21m as currently defined in draft Policy D4. [Originally submitted in response to Neighbourhoods]			Design principles		N8.SA1 Stratford Central	N8 Stratford and Maryland	Neighbourhoods	Reg18-E-026/013	Wm Morrison Supermarkets Ltd	Reg18-E-026
	This policy approach has now changed following further analysis undertaken and outlined in the Tall Buildings Annex (2024). Through this analysis it was concluded that the 32 m zone could be extended on the eastern side of the TBZ19: Stratford Central, which has the same sensitivity and suitability to tall buildings development of the western part of the tall building zone, whilst preserving the spatial hierarchy and objectives of the new local plan and the sensitive transition to a low rise context to the east. More details on the methodology used to identify suitable locations and height for tall buildings can be found on the Tall Building Annex (2024). Please see the new wording in Policy D4, TBZ19: Stratford Central and relevant site allocations.										
	Our client also supports that the allocation advocates increasing the density of the Site as part of any redevelopment, and the site allocation's acceptance of the principle of a tall building on site. The design principle for massing to step down from the northern to the southern part of the Site is also considered appropriate. [Originally submitted in response to Neighbourhoods]			Design principles		N8.SA4 Stratford High Street Bingo Hall	N8 Stratford and Maryland	Neighbourhoods	Reg18-E-100/006	Zirconia Stratford Unit Trust	Reg18-E-100
	Support noted.										

Reg18-E-100	Zirconia Stratford Unit Trust	Reg18-E-100/007	Neighbourhoods	N8 Stratford and Maryland	N8.SA4 Stratford High Street Bingo Hall		Design principles			<p>However, there is insufficient justification within the allocation or the supporting evidence base for the building height specific limits set within N8.SA4, restricting height to a range from 4 – 13 storeys. The wording of the allocation currently states: “Building heights should range from 4-13 storeys, stepping down towards the southern part of the site. Massing should be used to sensitively integrate with the prevailing building heights” In terms of considering prevailing building heights, it is important to acknowledge that immediately surrounding the Site are tall building height ranges of 7 to 32 storeys. Whilst there are a range of 2-4 storey buildings in the immediate context of the Site (i.e. to the west along Stratford High Street and along Burford Road), other notable developments that inform the Site’s context include:</p> <ul style="list-style-type: none"> • 304-308 Hight Street directly opposite the Site on the north side of the High Street – a hotel planning permission was granted in 2020 for a 22-storey building and resolution to grant has also been given for a student accommodation scheme at 25 storeys. • Eleanor Rosa House (formerly Duncan House) on the north side of the High Street – a student accommodation led scheme with a tower element of 19-32 storeys that was permitted in 2016 and has been constructed. • Burford Wharf on the corner of Kerrison Road and Cam Road to the south of the Site – residential-led mixed use development that was permitted in 2004 for buildings ranging from 7-21 storeys and has been constructed. 	<p>Newham Characterisation Study (2023) has been supplemented with a Tall Building Annex (2024). The document summarizes the sieving exercise that has been undertaken to identify locations where tall buildings may be an appropriate form of development and expands on the townscape assessment for each area of the borough and the methodology behind the spatial hierarchy. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p> <p>However, this policy approach has now changed to ensure a consistent approach to referencing heights in Policy D4 and the Neighbourhood policies. Please see the new wording in Table 1: Tall Building Zones, TBZ18: Stratford High Street and N8.SA4 Stratford High Street Bingo Hall site allocation.</p>
-------------	-------------------------------	-----------------	----------------	---------------------------	---	--	-------------------	--	--	--	--

									<p>See Figure 1 for a map demonstrating some of the building heights surrounding the Site. [Image attached - Figure 1 Aerial Map Showing Surrounding Building Height Context]</p> <p>Furthermore, it is noted that the surrounding context is planned to evolve even further with the following:</p> <ul style="list-style-type: none"> • Carpenters Estate in August 2022 Populo ,Newham Council's wholly owned housing delivery company, submitted the Carpenters Estate outline masterplan to LLDC following the passing of a residents ballot in December 2021. The Carpenters Estate outline Masterplan will deliver 2,152 high quality and sustainable homes with 50 percent at social rent. See Figure 2 for an extract of the massing strategy for this application. • Draft Site Allocation N8.SA1 (Stratford Central), which is adjacent to the Site on the other side of the DLR railway line, sets a storey height range of 5-18 storeys. • Draft Site Allocation N8.SA7 (Rick Roberts Way), which is on the south side of Stratford High Street to the south west of the Site, sets a storey height range of 2-16 storeys • Draft Site Allocation N8.SA8 (Land at Bridgewater Road), which is on the north side of Stratford High Street to the west of the Site, sets a storey height range of 3-16 storeys. <p>It is notable that all surrounding site allocations have a significantly greater maximum height range (i.e. of 16 or 18 storeys) compared to the N8.SA4 site allocation (i.e. at 13 storeys). It is not clearly evidenced or justified why this approach in difference in building heights</p>	
--	--	--	--	--	--	--	--	--	--	--

										has been taken. [Originally submitted in response to Neighbourhoods]	
--	--	--	--	--	--	--	--	--	--	--	--

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This policy approach has now changed to ensure a consistent approach to referencing heights in Policy D4 and the Neighbourhood policies. Please see the new wording in Table 1: Tall Building Zones and relevant site allocations.	Furthermore, it is also noted that Draft Site Allocation N8.SA3 (Greater Carpenter District) does not even stipulate a height range at all; instead it just states that “Building heights should be in accordance with Local Plan Policy D4 and the Tall Building Zone”. This represents an inconsistency in approach for the site allocations. [Image attached - Figure 2: Extract from Design and Access Statement supporting Carpenters Estate Outline Application showing Illustrative Masterplan with Proposed Taller Buildings in Pink] [Originally submitted in response to Neighbourhoods]		Design principles		N8.SA3 Greater Carpenters District	N8 Stratford and Maryland	Neighbourhoods	Reg18-E-100/008	Zirconia Stratford Unit Trust	Reg18-E-100

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This policy approach has now changed to ensure a consistent approach to referencing heights in Policy D4 and the Neighbourhood policies. Please see the new wording in TBZ18: Stratford High Street and relevant site allocations. The change you have suggested has not resulted in a change as we did not consider this change to be appropriate as, whilst we acknowledge that the impact of tall buildings will be assessed during the masterplanning and the planning application process, Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”.</p> <p>Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>			Design principles		N8.SA4 Stratford High Street Bingo Hall	N8 Stratford and Maryland	Neighbourhoods	Reg18-E-100/009	Zirconia Stratford Unit Trust	Reg18-E-100

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>This wording change has not been made. We did not consider this change to be appropriate as, based on the sieving exercise to identify tall building locations and maximum heights, TBZ18: Stratford High Street is not considered an appropriate location to accommodate greater height. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p> <p>However, this policy approach has now changed to ensure a consistent approach to referencing heights in Policy D4 and the Neighbourhood policies. Please see the new wording in Table 1: Tall Building Zones, TBZ18: Stratford High Street and N8.SA4 Stratford High Street Bingo Hall site allocation.</p>			Design principles		N8.SA4 Stratford High Street Bingo Hall	N8 Stratford and Maryland	Neighbourhoods	Reg18-E-100/010	Zirconia Stratford Unit Trust	Reg18-E-100

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-100	Zirconia Stratford Unit Trust	Reg18-E-100/014	Neighbourhoods	N8 Stratford and Maryland	N8.SA4 Stratford High Street Bingo Hall		Design principles			<p>Table 1: Summary of Recommended Changes to the Allocation N8.SA4:</p> <ul style="list-style-type: none"> Existing Wording: 'Design Principles: ...Building heights should range from 4-13 storeys, stepping down towards the southern part of the site. Massing should be used to sensitively integrate with the prevailing building heights...' Proposed Change: Change wording to: 'Design Principles: ...<u>The site is appropriate for accommodating tall buildings, with greatest height focused to the north of the site and Building heights should range from 4-13 storeys, stepping down towards the southern part of the site. Building heights should accord with policy D4 and</u> massing should be used to sensitively integrate with the prevailing building heights...' <p>[Originally submitted in response to Neighbourhoods]</p>	This wording change has not been made. We did not consider this change to be appropriate as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. Supporting text of Policy D9 part B (2) clearly states "in these locations, determine the maximum height that could be acceptable". More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024). However, this policy approach has now changed to ensure a consistent approach to referencing heights in Policy D4 and the Neighbourhood policies. Please see the new wording in Table 1: Tall Building Zones, TBZ18: Stratford High Street and N8.SA4 Stratford High Street Bingo Hall site allocation.
Reg18-E-100	Zirconia Stratford Unit Trust	Reg18-E-100/031	Neighbourhoods	N8 Stratford and Maryland			2			<p>Part 2 of Policy N8 supports the transformation of the area and its development allocations in accordance with the Tall Building Zone and Policy D4. However, in line with the comments in the previous section, we would highlight that prescriptive limits to density increases and height should be avoided within the policy for the reasons previously set out.</p>	A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. Supporting text of Policy D9 part B (2) clearly states "in these locations, determine the maximum height that could be acceptable".

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	[Originally submitted in response to Neighbourhoods]										
	A change to this policy approach has not been made. We did not consider this change to be appropriate as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).	Specifically these representations raise the following points it is considered should be amended within the subsequent drafts of the Local Plan: • Site Allocation N8.SA4 – remove specific height limits for building heights, allow for a widening of the acceptable lower level uses at the site and remove specific requirement for a pedestrian through route through the site [Originally submitted in response to Neighbourhoods]		Design principles		N8.SA4 Stratford High Street Bingo Hall	N8 Stratford and Maryland	Neighbourhoods	Reg18-E-100/052	Zirconia Stratford Unit Trust	Reg18-E-100

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. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).			3			N9 West Ham	Neighbourhoods	Reg18-Ap-001/036	Plaistow Assembly	Reg18-Ap-001
	Unfortunately, it was not clear what change you wanted to make to this part of the Plan. No changes have been made.			4		N9.SA1 Plaistow North	N9 West Ham	Neighbourhoods	Reg18-Ap-001/078	Plaistow Assembly	Reg18-Ap-001
	Support noted.			Design principles		N9.SA1 Plaistow North	N9 West Ham	Neighbourhoods	Reg18-E-023/012	Resident	Reg18-E-023

Reg18-T-114	Resident	Reg18-T-114/019	Neighbourhoods	N9 West Ham			D4			<p>[Change it] and do not allow higher than 6 storeys buildings. [Originally submitted in response to Neighbourhoods]</p>	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Policy D9 part A requires boroughs to identify in their development plan what is considered a tall building for their specific localities but it states that tall building "should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey."</p> <p>In accordance to Policy D9 part A, and based on local context analysis, Newham has defined 21m (ca. 7 storeys) as the height at which buildings become substantially taller than its surrounding.</p> <p>Suitable locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets.</p> <p>Based on the sieving exercise undertaken to identify suitable locations for tall buildings across the borough and, due to its Local Centre designation, in a transform area with a high level of accessibility, the TBZ15: West Ham Station is considered suitable to accommodate tall buildings development. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>
-------------	----------	-----------------	----------------	-------------	--	--	----	--	--	---	--

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet Newham's housing need. Policy D9 part A requires boroughs to identify in their development plan what is considered a tall building for their specific localities but it states that tall building "should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey."</p> <p>In accordance with Policy D9 part A, and based on local context analysis, Newham has defined 21m (ca. 7 storeys) as the height at which buildings become substantially taller than its surroundings.</p> <p>Suitable locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Due to its Local Centre designation, in a transform area with a high level of accessibility, the N9.SA1 Plaistow North site allocation is considered suitable to accommodate tall building developments.</p> <p>Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable</p>										<p>Reg18-As-001</p>

Comment Response		locations for tall buildings can be found in the Tall Building Annex (2024).
Comment		
Implementation		
Justification		
Clause		
Introduction		
Site allocation		
Policy		
Chapter		
Comment Reference		
Representor		
Representation Reference		

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-121	Barratt London	Reg18-E-121/050	Design		N5.SA5 Canning Town Riverside					[The Newham Characterisation Study (2022) suggests that the Site is located in an area that is suitable for growth (Opportunity for growth map on p.146). We make the following observations arising from the Newham Characterisation Study:] o We note that the map on p145 and elsewhere in the document mis-identifies the extent of the 2018 adopted TBZ and we request that this be corrected; [Originally submitted in response to D]	This was an error and has now been corrected. Please see the new maps in Newham Characterisation Study (2024).
Reg18-E-151	Cllr Islam, Cllr Beckles, Cllr Choudhury, Cllr Corben, Cllr Master, Cllr Sarley Pontin	Reg18-E-151/043	Design							Borough wide design principles The draft plan resembles the traditional top down urban planning which has blighted so many communities in recent years. Examples are the building of the Beckton Tower Blocks through the developments in South Canning Town to the previous policies for the Carpenters Estate. The current masterplan for Carpenters Estate produced in proper consultation and joint working with residents points the way to a different model of development which the draft plan neglects.	Comment noted. We did not consider a change to be necessary as the draft Local Plan has sought to balance providing overarching design principles, informed by GLA and other design guidance as well as thorough and innovative resident engagement, and retention of sufficient flexibility to ensure that when schemes are brought forward they can be further shaped to meet local residents' needs. The published Consultation Reports provide additional detail about the community engagement activities we undertook during the two previous rounds of engagement that then informed the drafting of the policies. The engagement programme received national recognition for its innovation and inclusivity at the Planning Awards 2023, where the Issues and Options consultation won the Stakeholder Engagement in Planning award.

Comment Response	Engagement at the plan making stage can never be as detailed or locally specific as is possible for individual sites and schemes. For example, the Local Plan contains 45 site allocations, of which the Carpenters Estate is only one. Undertaking the level of co-production undertaken for that one site for the whole plan would have far exceeded the time and resources available. Policies D1 and BFN2 therefore require high quality and early engagement and co-production with communities. Following feedback during this consultation, the policy has changed to include additional implementation detail about the importance of early engagement with a range of different local communities in the design brief evolution of the scheme, in order to ensure the selected design option for the development is inclusive.
Comment	
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
	<p>Comment noted. The design principles were developed using GLA and other design guidance and informed by the Characterisation Study, which was itself informed by resident engagement.</p> <p>In addition, the Regulation 18 consultation included 8 Local Plan Neighbourhood Assemblies, held in person and online, at which residents and other stakeholders were specifically invited to review and respond to the neighbourhood policies and site allocations, including the design principles. The sessions included a presentation explaining the purpose of different parts of the Plan and the policy team was available to ask detailed questions. Feedback, from these sessions, and other engagement activity has informed the development of the design principles. Please see the Consultation Report for more details.</p>							Design	Reg18-E-151/044	Cllr Islam, Cllr Beckles, Cllr Choudhury, Cllr Corben, Cllr Master, Cllr Sarley Pontin	Reg18-E-151
	<p>Comment noted. The published Consultation Reports provide additional detail about the community engagement activities we undertook during the two previous rounds of engagement that then informed the drafting of the policies. The engagement programme received national recognition for its innovation and inclusivity at the Planning Awards 2023, where the Issues and Options consultation won the Stakeholder Engagement in Planning award.</p>							Design	Reg18-E-151/046	Cllr Islam, Cllr Beckles, Cllr Choudhury, Cllr Corben, Cllr Master, Cllr Sarley Pontin	Reg18-E-151

Comment Response	<p>In addition, the consultants commissioned to undertake the Newham Characterisation Study undertook focused engagement to understand people's perceptions of their neighbourhood and what 15 minutes living might mean to them.</p> <p>The planning policy team was also closely involved in the development and running of the 15 minute neighbourhood standing assembly (2022) and the findings from that process have helped inform policies on inclusive economy, social infrastructure, green spaces, transport and public realm.</p> <p>Engagement at the plan making stage can never be as detailed or locally specific as is possible for individual sites and schemes. Policies D1 and BFN2 therefore require high quality and early engagement and co-production with communities. Following feedback during this consultation, the policy has changed to include additional implementation detail about the importance of early engagement with a range of different local communities in the design brief evolution of the scheme, in order to ensure the selected design option for the development is inclusive.</p>									
Comment										
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
	<p>Comment noted. Design policies in the emerging Local Plan provide a robust framework to deliver high quality design and materials.</p> <p>The inclusion of a new requirement for post-occupancy surveys as part of new permissions on site allocations will also help insure that more in-depth learning can be gained from these developments, helping to monitor against the quality objectives of the policies. However, the policy cannot be applied retrospectively.</p>	<p>Quality of development</p> <p>Sometimes it is better not to have development than have development that is of poor quality and degrades quickly after it has been built and occupied. There have been too many developments in recent years which were poorly built in Newham, with far too many faults and defects. Many have used poor quality materials that do not age well and the aesthetic quality of what has been built has been both disappointing and not supported the high aesthetic standards expected in Newham.</p>						Design	Reg18-E-151/052	Cllr Islam, Cllr Beckles, Cllr Choudhury, Cllr Corben, Cllr Master, Cllr Sarley Pontin	Reg18-E-151
	<p>Comment noted. Planning enforcement is guided by separate planning legislation and regulations to that of plan-making. There is currently no legal mechanism to secure a financial penalty at planning application stage to cover a future potential enforcement breach. However, the Planning Enforcement team can request award of costs where the appellant has behaved unreasonably during an appeal and in cases where enforcement notices are issued and not complied with the Planning Enforcement team can seek to prosecute the landowner, which may then receive a financial penalty as part of the court's decision.</p>	<p>For enforcement, financial penalties need to be inbuilt into the planning consent process.</p>						Design	Reg18-E-151/054	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
	Comment noted. New development will continue to be required to provide accessible parking (blue badge spaces) and ensure it is provided in a suitable location (see policy T3).	Furthermore, there is a concern that the needs of disabled residents are not being adequately accounted for, particularly in car free developments where parking spaces are required for blue badge holders.						Design	Reg18-E-151/081	Cllr Islam, Cllr Beckles, Cllr Choudhury, Cllr Corben, Cllr Master, Cllr Sarley Pontin	Reg18-E-151
	<p>Comment noted. Policies D1 and BFN2 require high quality and early engagement and co-production with communities. Following feedback during this consultation, the policy has changed to include additional implementation detail about the importance of early engagement with a range of different local communities in the design brief evolution of the scheme, in order to ensure the selected design option for the development is inclusive.</p> <p>The Composition of the Newham Design Review Panel has also been monitored and improved. New recruitment to the panel took place in September 2021. This established a pool of 35 panel members of which 51% are male and 49% are female, with 13% being from a Black, Asian or ethnically diverse background.</p> <p>The intent, when selecting a panel to review proposals is to match, as far as possible, the particular expertise of panel members to the proposals under review. Further, the intention is to try to ensure a diverse panel in</p>	<p>This imposition [top-down planning] is reinforced at various levels within the planning framework in the context of the borough, including for example Newham's Design Review Panel, which helps to advise officers on major development projects with regards to design and architecture. The panel does not reflect the diverse population of the borough, nor gain input or engagement from those who live in the borough.</p>						Design	Reg18-E-151/095	Cllr Islam, Cllr Beckles, Cllr Choudhury, Cllr Corben, Cllr Master, Cllr Sarley Pontin	Reg18-E-151

Comment Response	terms of gender and ethnicity. This is not always possible due to availability or panel member specialism, but has been largely achieved since September 2021 when new panel members were appointed. Work is ongoing to ensure the composition of the panel reflects the diversity of the borough, while noting the broader systemic issues of diversity within built environment professions.
Comment	
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
	Support noted	Design D1 - D10 We are pleased to see the design-led approach set out in the Issues and Options Consultation of 2021 / 2022 further developed in the Draft Newham Local Plan. This will allow the integration of the latest design guidance from the London Plan and the supporting evidence base into policies which will enable development of the borough to achieve the high standards of design on schemes coming forward in and beyond the Local Plan Period. In addition to meeting the requirements as set out in the London Plan, the adoption of a design-led approach will help development in the borough deliver against existing objectives by making the borough feel safer, easier to move around and enhancing the look and feel of both the built and natural environment. The commissioning of a characterisation study is a robust way of ensuring that the development coming forward in the Local Plan period balances the consideration of the existing character of the borough and the growth requirements set out in the plan.						Design	Reg18-E-134/009	London Borough of Waltham Forest	Reg18-E-134

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Support noted	Having reviewed the Draft Newham Local Plan December 2022 we can confirm that the Borough have shown consistent and positive considerations in regards to security, Designing Out Crime and the MOPAC-endorsed quantifiable crime reduction scheme of Secured by Design (SBD). This is embedded throughout the document as shown in Appendix 2 [extract of Local Plan Reg 18 policies considered].						Design	Reg18-E-011/002	Metropolitan Police Service - Designing Out Crime	Reg18-E-011
	Comment noted.	We do, however, include the below extra recommendations and considerations to further improve the proposed Newham Local Plan from a security perspective. We are happy to be involved in further discussions on any of the points below or other future considerations that relate to security and safety.						Design	Reg18-E-011/004	Metropolitan Police Service - Designing Out Crime	Reg18-E-011
	Comment noted	11) Any separate comments from the MPS Estates Management Team should be given due consideration and be read alongside the comments provided in this response.						Design	Reg18-E-011/015	Metropolitan Police Service - Designing Out Crime	Reg18-E-011
	This wording change has been made. Please see the new wording in policies D1, D2 and D5 (formerly D6).	Secondly, our members wanted to highlight the very poor experiences for disabled people in Newham which often relate to the poor quality of the built environment (such as uneven pavements, obstacles on pavements etc) through to poor decisions about access and accessibility - with new buildings providing services for resident either in inaccessible locations (no near bus stops						Design	Reg18-E-001/007	One Newham	Reg18-E-001

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		or disability parking) or the buildings themselves are not properly and fully accessible.									
	Comment noted. The Characterisation Study has been further reviewed and the London Aquatics Centre has been added to the list of local landmarks. Please see revised Newham Characterisation Study - chapter-3-functional-character-part-2 (2024).	Chara cterisa tion Study						Design	Reg18-E-087/005	Resident	Reg18-E-087
	Comment noted. The Characterisation Study has been further reviewed to clarify that Woodgrange Road has been considered together with Upton Lane. Please see revised Newham Characterisation Study - chapter-3-functional-character-part-3 (2024).	Chara cterisa tion Study						Design	Reg18-E-087/006	Resident	Reg18-E-087

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		if it is an actual omission which, if so, must surely be a mistake.									
	Comment noted. The Characterisation Study has been further reviewed and this change has been made. Please see revised Newham Characterisation Study - chapter-3-functional-character-part-3 (2024).	Map of facilities on P26 of characterisation study – is out of date – so should have a date on it when it was correct.	Characterisation Study					Design	Reg18-E-087/007	Resident	Reg18-E-087
	Comment noted. The Characterisation Study has assessed the ethnic profile of the borough under the broad ethnic groups, with Eastern European ethnicities falling under the White ethnic group. The cultural contribution of specific ethnic sub-groups is recognised in principle; however, it was not necessary to undertake a detailed assessment within the scope of the Characterisation Study. Other strategies and studies that have been used to inform the Local Plan have taken a more detailed approach, see for example the Strategic Housing Market Area Assessment, as well as the Equalities Impact Assessment supporting the development of the Plan.	In the characterisation study, the demographic by ethnicity makes no mention of the large densities of Eastern European communities – these communities are helping to keep the high streets viable with local independent shops and local shopping habits. This needs reflecting into the study. The breakdown of Black / Asian / white doesn't give enough information to fully understand the demographic and indeed the implications that Brexit may eventually have on the population.	Characterisation Study					Design	Reg18-E-087/008	Resident	Reg18-E-087
	Comment noted. This part of the Plan has now added inclusive design criteria for consideration and provided relevant best practice guidance to support implementation. Please see the new wording	There is very little understanding in the townscape of the challenges faced by people with disabilities and there is little mention of this in the document – or a commitment to involve those who are experts by experience.						Design	Reg18-E-087/012	Resident	Reg18-E-087

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	in policy D1 Design Standards and D2 Public Realm Net Gain.										
	Comment noted.	No public housing estate in Newham has been so recognised while the quality of private housebuilding from the first LDDC developments in Beckton in the early 1980's to date is at best mediocre.						Design	Reg18-E-098/032	Resident	Reg18-E-098
	Comment noted.	Newham has a history and expectation arising from post war development from Thomas North and Ken Lund on for poor quality design and consultation with residents which extends in an unbroken line through to much of the over dense Populo Living new build now on site . (See eg Patrick Dunleavy for the building of the Beckton Tower Blocks in The politics of Mass Housing in Britain 1945-1975 through to Paul Watt's current and Seminal "Estate Redevelopment and its Discontents" for their references to Newham.)						Design	Reg18-E-098/033	Resident	Reg18-E-098
	Comment noted.	What specific DP <i>policies</i> will ensure better, let alone high quality, design in future which are more than an aspiration when this has <i>never</i> been a topic of great concern for members and officers since Newham was established as a borough in 1966.						Design	Reg18-E-098/034	Resident	Reg18-E-098

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 necessary as the policies draw on substantial current best practice guidance. The monitoring framework set out makes use of methods of data gathering available to the council or other public organisations, and is considered effective in monitoring for consistency of approach in decision-making in relation to policy objectives, and to provide further learning about local design matters.							Design	Reg18-E-098/035	Resident	Reg18-E-098
	A change to this policy approach has not been made. We did not consider this change to be necessary as Secured by Design is already a key part of Policy D1.							Design	Reg18-E-098/036	Resident	Reg18-E-098
	This wording change has been made. Please see the new wording in policy D1 implementation section.							Design	Reg18-E-098/044a	Resident	Reg18-E-098
	A change to this policy approach has not been made. We did not consider this change to be necessary as the local plan already addresses the matter of integration of development into its existing built environment context through policies D1 and D3, as well as guidance under the Neighbourhoods chapter.							Design	Reg18-E-098/060	Resident	Reg18-E-098

Reg18-K-041	Resident	Reg18-K-041/001	Design			3.13				<p>Has there been any co-ordination in planning design over the last dozen years? Very few of the current crop of tall buildings match/fit in with either each other or the surrounding buildings. Stratford is looking increasingly like a 5 year old has run amok with a big box of Lego</p>	<p>A change to this section has not been made. We did not consider this change to be appropriate as the Design policies of the Plan seeks to improve integration of new development into its context, while also being clear as part of the tall buildings approach of policy D4 where existing tall buildings do not justify ongoing intensification of the skyline. A significant proportion of Stratford has been under the planning authority of the London Legacy Development Corporation (and under the Olympic Park Development Corporation before that). Newham is in the process of taking back planning powers, in 2024, and as part of that this new Local Plan will replace the existing LLDC Local Plan (2020) to guide development of the neighbourhood going forward. As part of the development of the Local Plan, the Characterisation Study looked at the quality of the built form in Stratford and made specific recommendations with regards to managing its development going forward - please see Chapter 8, Stratford and Maryland neighbourhood. Newham Characterisation Study (2023) has been supplemented with a Tall Building Annex (2024). The document summarizes the sieving exercise that has been undertaken to identify location where tall buildings may be an appropriate form of development and expands on the townscape assessment for each area of the borough. Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing height, proximity to public transport, impact on open space and heritage assets. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).</p>
-------------	----------	-----------------	--------	--	--	------	--	--	--	--	---

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		D4.3						Introduction	Reg18-T-034/004	Resident	Reg18-T-034
	<p>[Please provide any comments and feedback on the *Introduction*.] I like to see restriction on height of developments in town centres and high streets as these tend to dominate and make walking and cycling less appealing.</p> <p>London Plan (2021) Policy D9 sets out a comprehensive list of criteria for tall buildings to meet, including environmental impacts. The impact of tall buildings has been taken into consideration and addressed in the Policy D4.3 which requires microclimate considerations, including wind and air quality assessments. To stress the importance of wind assessments in high streets and town centres, a wording change has been made. Please see the new wording in D4.3.</p>										

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>In the context of the above [height restrictions via airport limits rather than policy] it would be useful to set out the relationship between planning policy and airport restriction. In particular clarity is needed on how any reduction in airport height restrictions is dealt with through planning system and local consultation. Any reduction in heights would have a significant impact on the design and viability of development to be brought forward across the Site, and must be appropriately discussed with landowners.</p> <p>[Originally submitted in response to General]</p>			Table 1: Tall Building Zones		N4.SA1 Royal Albert North		General	Reg18-E-092/063	Royal Docks	Reg18-E-092

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	<p>Comment noted. The Characterisation Study (2022) was developed in line with GLA methodology contained within the now-published Characterisation and Growth Strategy LPG, which does not include a requirement to assess the character change impact of development yet in the pipeline. It is appropriate to only consider recently build development, as permissions that remain as yet unimplemented may have further modifications that affect end character of the area.</p>	<p>B) Representations - Characterisation Study (CS)</p> <p>Chater 4 (Urban Morphology) & Chapter 8 (3. Royal Docks) – Suggested Amendment</p> <p>Page 24 of LBN’s Characterisation Study considers the ‘current and emerging urban characters’ in the Royal Docks area. It only discusses developments that have been constructed, but there are proposals that benefits from extant permissions that will form part of the emerging urban characters. One such development is the Thameside West development which is described above.</p> <p>Recommendation</p> <p>SHL suggest that:</p> <ul style="list-style-type: none"> • Page 24 highlights that there is other emerging development in the area that will also add to the character of the area when they are constructed, including Thameside West which includes buildings of up to 26-storeys. This is then reflected in the ‘Transform’ designation set on pages 151 and 188 of the Characterisation Study which is supported by SHL; and 						Design	Reg18-E-069/021	Silvertown Homes Ltd	Reg18-E-069

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This wording change to the Characterisation Study has not been made. We did not consider this to be necessary as the reference to "former SIL area between Royal Wharf and Canning Town" includes, albeit indirectly, the N3.SA4 Thameside West site allocation.	<ul style="list-style-type: none"> Under the heading of 'Future Mix' on page 187 of the Characterisation Study, the Thameside West site should be included in the list of sites that have the "potential for shift in use focus from industrial / brownfield to residential-led mixed use major plot opportunities". 						Design	Reg18-E-069/022	Silvertown Homes Ltd	Reg18-E-069

Reg18-E-069	Silvertown Homes Ltd	Reg18-E-069/023	Design				TBZ13: Canning Town		<p>Proposed Tall Building Zones (Pages 164 and 188) - Objection</p> <p>The tall building zone diagram (Page 164) identifies the location and extent of areas that are appropriate for tall buildings. This area includes the west part of the Thameside West site but excludes the eastern part of the Thameside West site. However, as explained above, the Extant Mixed-Use Permission for the wider site is supported by a Parameter Plan 04 Ref: A-SL-011-XX-05 Rev 04) which allow for tall buildings across the wider site (see Appendix 1), including:</p> <ul style="list-style-type: none"> • 13 to 21-storeys in Phase 1 (Buildings A & B); • Up to 74.4m (20-storeys) in Phase 2 (Buildings D & E); • Up to 84.8m (23-storeys) in Phase 3 (Buildings C & F); and • Up to 91.2m (24-storeys) in Phase 4 (Building G). <p>These phases of the development, which include tall buildings, are located on the east part of the Thameside West site and currently excluded from the tall buildings zone (TBZ) shown on page 164. Therefore, it is inappropriate to:</p> <ul style="list-style-type: none"> • Exclude the east part of the Thameside West site from the tall building zone; and • To limit the height of the tall buildings on the wider Thameside West site to a maximum of 50m in the legend (page 164). <p>Recommendation</p>	<p>This policy approach has now changed following further analysis undertaken and outlined in the Tall Buildings Annex (2024). Through this analysis it was concluded that the 50m tall building zone could be extended to include the eastern part of the site which has the same suitability to tall building developments of the western part of the site. The change you have suggested has not resulted in a change as, whilst we acknowledge that consents have been granted with tall elements at greater heights than the heights allowed within the tall building zone designation in the emerging plan and that the site can still benefit from these consents, these consents were permitted under the adopted Local Plan. The draft emerging Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context. Based on the methodology used to identify suitable locations and heights for tall buildings, and due to its location in an area with limited accessibility to public transport, N2.SA4 Thameside West it is not considered appropriate for 100m Tall Building Zone designation. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024). Furthermore, this policy approach has now changed to ensure a consistency approach to referencing heights in Policy D4 and the Neighbourhood policies. Please see the new wording in Table 1: Tall Building Zone, TBZ13: Canning Town and relevant site allocations, including N2.SA4 Thameside West.</p>
-------------	----------------------	-----------------	--------	--	--	--	---------------------	--	---	---

										<p>SHL suggest that:</p> <ul style="list-style-type: none"> • The tall building zone identified on pages 164 and 188 should be extended to include the east part of the Thameside West site [LBN may choose to give the Thameside West site a separate TBZ reference]; • The maximum height for TBZ indicated in the legend (pages 164 and 188) should be adjusted to recognise the extant planning permission. This should be up to 100m to reflect the colours indicated in the legend that supports the tall buildings map; and • The Thameside West site should then be listed in the section called “Tall elements within large masterplan area” found on page 165 of the Characterisation Study. <p>[Originally submitted in response to H1]</p>	
--	--	--	--	--	--	--	--	--	--	---	--

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. London Plan Policy D1 part A, requires boroughs to undertake an area assessment to define the characteristics, qualities and value of different places within the plan area to develop an understanding of different areas' capacity for growth. The Characterisation study has supported the preparation of the Local Plan as an Evidence Base Document and we intend to proceed to adopt parts of the Characterisation Study as a Design Guide once the new Local Plan is adopted.	H1.2 states that housing schemes should set out how housing densities reflect local context and character (using the guidance and analysis set out in the Newham Characterisation Study). Whilst the Newham Characterisation Study (2022) has been published alongside the Draft Local Plan consultation, it is not clear what status this document is intended to have (e.g. whether it is intended to be an SPD and a material consideration in the determination of applications). This should be clarified by LBN.						Design	Reg18-E-080/032	Transport Trading Limited Properties Limited	Reg18-E-080