



Statement of Common Ground

Between

London Borough of Newham

and

London Legacy Development Corporation (LLDC)

Stage: Newham Submission Draft Local Plan (Reg. 19)

Date: 27th May 2025

1. Introduction

- 1.1. This Statement of Common ground addresses key matters/issues between the two signatories, the London Borough of Newham (LBN) and LLDC in its role as landowner and developer, as relevant to:
 - the preparation of the Newham Draft Submission Local Plan and its progression to public examination.
- 1.2. The LLDC made a number of comments and suggested modifications to a number of policies in the draft Submission Local Plan through joint representations made between the LLDC as Local Planning Authority (who prepared the current LLDC Local Plan 2020) and its role as landowner and developer to the Regulation 18 and Regulation 19 consultation.
- 1.3. This Statement of Common Ground sets out the areas of agreement between the London Borough of Newham and the LLDC, and outlines a resulting minor modification. This modification has been agreed to by both parties.
- 1.4. This Statement of Common Ground relates to only policy N8.SA8. It is noted that the LLDC and LBN have met to discuss potential modifications to the plan which seek to address further concerns raised, however, there are still issues outstanding and the policies these relate to are listed in Appendix 1.
- 1.5. Appendix 1 sets out a Statement of Fact on matters not agreed between the London Borough of Newham and the LLDC.
- 1.6. Following the Regulation 19 consultation, a Part 1 Statement of Common Ground was agreed between the LLDC, in its role of local planning authority in the pre-transition of planning powers, and the London Borough of Newham. A copy of the Part 1 Statement of Common Ground can be found at Appendix 2.

2. Background

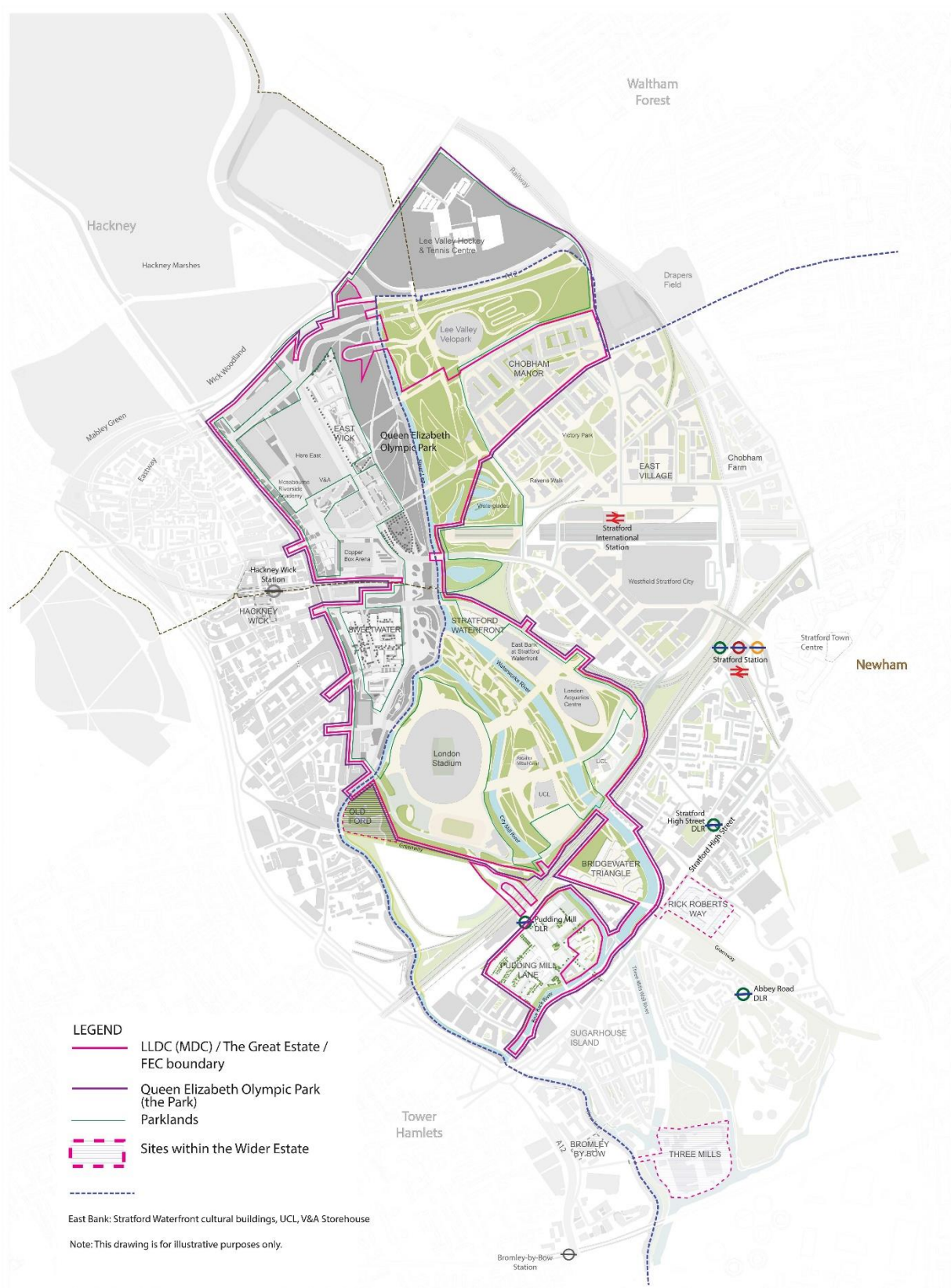
- 2.1. The London Legacy Development Corporation (LLDC) in its role as a Mayoral Development Corporation has been fronting the development and management of the Queen Elizabeth Olympic Park (QEOP) and its wider estate. The QEOP Estate expands across four London Boroughs; London Borough of Newham, London Borough of Waltham Forest, London Borough of Hackney and the London Borough of Tower Hamlets and is owned by LLDC.
- 2.2. Within the London Borough of Newham, the QEOP Estate, including sites that the LLDC manage and own, is shown in Figure 1. A number of these sites have outline planning permissions and are due to either be developed or be progressed further through the submission of more detailed applications. The sites and their associated planning permissions and applications are provided in Table 1

Site	Proposal	Planning Application(s)	Status
Chobham Manor	Outline Planning Permission – Legacy Communities Scheme (LCS)	11/90621/OUTODA (as varied by 24/00115/VAR)	Delivered
	Phase 1 Reserved Matters -259 residential units; 745sq.m of	13/00504/REM	Delivered

	retail and 42sq.m of office floorspace.		
	Phase 2 Reserved Matters – 207 residential units; 495sq.m of retail and 38sq.m of office floor space.	14/00356/REM	Delivered
	Phase 3 Reserved Matters – 253 residential units; 882.81sq.m community and nursery floor space.	16/00510/REM	Delivered
	Phase 4 Reserved Matters – 140 residential units and 98.5sqm retail	16/00518/REM	Delivered
Stratford Waterfront	Hybrid permission for residential use (outline) and culture/education buildings (detailed)	18/00470/OUT (as varied by 20/00274/VAR)	Approved and partially delivered
	Reserved matters for 700 residential units	24/00067/REM	Approved
Bridgewater Triangle	Outline permission for residential use	21/00403/OUT	Approved
Pudding Mill Lane	Outline permission for mixed-use residential-led use	21/00574/OUT	Approved
Rick Roberts Way	Outline permission for residential use	11/90621/OUTODA (as varied by 24/00115/VAR)	Approved
Old Ford	Detailed permission for a new sui-generis Park Headquarters Centre	24/00264/FUL	Approved
UCL East	Mixed-use academic development	17/00235/OUT	Approved and partially delivered
	Reserved matters for phase 1 public realm	18/00426/REM	Approved and Delivered
	Reserved matters for student accommodation and academic floorspace	18/00425/REM	Approved and Delivered
	Reserved matters for academic floorspace	18/00424/REM	Approved and Delivered

Table 1 – LLDC Development Sites within LB Newham

- 2.3. Although not within LLDC's ownership, LLDC also has interest in Stratford Station due to their strategic importance to the development and management of the QEOP Estate and a minor land interest at Bow Goods Yard.



3. Agreed amendments between London Borough of Newham and LLDC

Chapter	Policy / Section / Paragraph	Agreed outcome								
Neighbourhoods	N8.SA2 Stratford Station	In relation to comment reference Reg19-E-217/020 the following modifications to the N8.SA2 Stratford Station site allocation map has been agreed. The modification both parties agree to is below, which has been made to the submission version of the Local Plan: <table><tr><th>Site allocation / location</th><th>Change required</th><th>Regulation 19</th><th>Submission</th></tr><tr><td>N8.SA2 Site Allocation Map</td><td>Add the rail tracks to the site allocation map.</td><td></td><td></td></tr></table>	Site allocation / location	Change required	Regulation 19	Submission	N8.SA2 Site Allocation Map	Add the rail tracks to the site allocation map.		
Site allocation / location	Change required	Regulation 19	Submission							
N8.SA2 Site Allocation Map	Add the rail tracks to the site allocation map.									

4. Signatories

4.1. We confirm that both parties consider that this statement reflects the agreed position in advance of the Examination of the Submission Newham Local Plan.

Signed on behalf of London Borough of Newham:  Name: Ellie Kuper Thomas Date: 28th May 2025 Position: Planning Policy Manager, Planning and Development Directorate	Signed on behalf of LLDC:  Name: Craig Roberts Date: 27th May 2025 Position: Senior Planning Manager, Development Directorate
---	--

Appendix 1 - Statement of Fact on matters not agreed between London Borough of Newham and LLDC

There remains a number of items raised by LLDC in their response to the Regulation 19 consultation which are not agreed, and therefore their comments in their representation still stand. In summary these relate to part of the policies or site allocations below.

Chapter	Policy / Section / Paragraph
Design	D4: Tall Buildings
Homes	H3: Affordable housing
Homes	H4: Housing mix
Climate emergency	CE2: Zero carbon development
Climate emergency	CE3: Embodied carbon
Neighbourhoods	N8.SA2 Stratford Station <i>Supportive of the amendments to the Stratford Station Site Allocation map as highlighted above, but retain their comments on other parts of the site allocation.</i>
Neighbourhoods	N8.SA7 Rick Roberts Way
Neighbourhoods	N8.SA8 Bridgewater Road <i>LLDC disagree with the inclusion of building height wording 'Building heights should range between 21-32m (ca. 7-10 storeys) with taller buildings up to 50m (ca. 16 storeys) in the east and south east of the site.'</i> <i>Partial agreement was made between LBN and LLDC to this proposed wording:</i> <i>Massing should step down towards be sensitively designed to prevent overshadowing the allotments in the north of the site to sensitively integrate with the low rise context and prevent overshadowing and to protect their functionality.</i> <i>LLDC requested 'step down towards' to be removed; and 'unreasonable' to be inserted before 'overshadowing' to reflect the existing planning permission and the site's proposed allocation. However, the protection of the allotments and their functionality remains a key priority and LBN believes the word 'unreasonable' poses a risk on the use of the allotments. Therefore, the word 'unreasonable' was not included in the text taken forward in the minor modifications agreed at Full Council on the 28th April.</i> <i>Subsequently, the LLDC agreed to the minor modification wording if the word 'and' was removed to clarify that this clause only relates to overshadowing impacts on the functionality allotments. This was the Council's intention for the new wording, however, the Submission version of the Plan had been approved with the previously agreed wording,</i>

	<i>If the inspector is minded to make these changes over the partial agreement only,, the Council would not object.</i>
Neighbourhoods	N8.SA9 Pudding Mill
Neighbourhoods	LLDC wanted to include the following sites as allocations in the Submission Local Plan: • Three Mills • Stratford Waterfront South (Aquatics Triangle) • Bow Goods Yard • London Stadium

Appendix 2 - Statement of Common Ground Part 1 between London Borough of Newham and London Legacy Development Corporation in its role pre-transition of planning powers.



Statement of Common Ground

Between

London Borough of Newham

And

**London Legacy Development Corporation in its role pre-transition
of planning powers**

**Stage: Newham Submission Draft Local Plan (Reg. 19) and the
transfer of local planning authority powers back from LLDC to LBN**

Date: 29th November 2024

1. Executive Summary

- 1.1. A statement of common ground (SoCG) is a written record of the progress made by plan-making authorities during the process of planning for strategic cross-boundary matters. It documents the strategic matters where effective cooperation has led to cross-boundary challenges and opportunities being identified, whether there is agreement between bodies in how these should be addressed, and how the strategic matters have evolved throughout the plan-making process. It is also a way of demonstrating at examination that plans are deliverable over the plan period, and based on effective joint working across local authority boundaries.
- 1.2. The London Legacy Development Corporation (LLDC) has made representations in its capacity as the current local planning authority for its area until 30th November 2024, and as a landowner. From 1st December 2024, the LLDC will continue to function as a Mayoral Development Corporation. To reflect this and more particularly, the date from which the LLDC ceases to be a local planning authority, it was agreed that the statement of common ground with the LLDC would be in two parts. This Statement of Common ground addresses key strategic matters between the two signatories, the London Borough of Newham and the LLDC in its role as a local planning authority as relevant to the preparation of the Newham Draft Submission Local Plan and its progression to public Examination. A further SoCG with the LLDC as Mayoral Development Corporation and landowner will follow.
- 1.3. Strategic matters overseen by other organisations will be addressed in other SoCGs, in order to streamline the process of reaching agreements with each party. Where key strategic issues overlap between different organisations the London Borough of Newham will aim to have signed statements of common ground with (e.g. the delivery of housing targets), these interrelations as summarised in the Duty to Cooperate Statement (2024) and the future Duty to Cooperate Addendum (2025).
- 1.4. National Planning Practice Guidance requires that statements of common ground undertaken with duty to cooperate partners are updated as circumstances change. However, the LLDC is due to return planning powers back to the London Boroughs of Newham, Tower Hamlets, Waltham Forest and Hackney by the 1st of December 2024. As such, key strategic matters for the parts of the LLDC that fall within Newham's administrative boundaries are also addressed in the new Newham Draft Submission Local Plan, and are subject to the matters addressed in this statement of common ground. Following the transfer of powers back to Newham, the duty to collaborate between plan-making authorities, as prescribed through national policy and law, will cease to apply to the LLDC. Governance arrangements in relation to this SoCG will therefore no longer be necessary. The LLDC will continue to operate in Newham as a Mayoral Development Corporation and landowner, and it has been agreed that a further Statement of Common Ground will cover sites to reflect this.

2. Parties Involved

- 2.1. Newham Council, is the Local Planning Authority for the London Borough of Newham, which is an inner London Borough in East London situated between three rivers: the Lea to the west, Thames to the south and Roding to the east. The London Borough of Newham is bordered by several other London Boroughs, including Tower Hamlets, Hackney, Waltham Forest, Redbridge, and Barking and Dagenham. Across the River Thames lies the Royal Borough of Greenwich. Newham's administrative boundaries also contain 65% of the London Legacy Development Corporation area, which has acted as the planning authority for the Queen

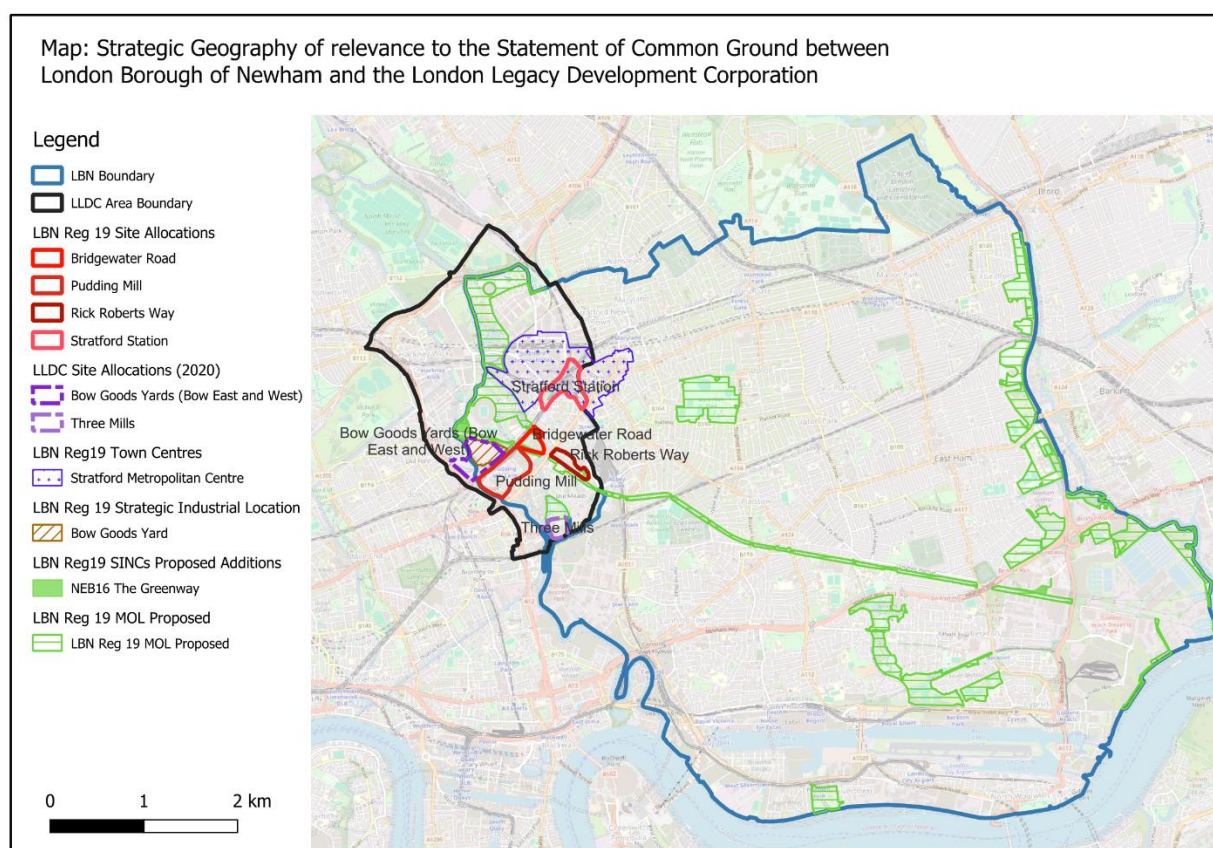
Elizabeth Olympic Park and surrounding area until the return of planning powers to the boroughs on 1st December 2024.

AND

- 2.2. The London Legacy Development Corporation (LLDC) in its role as the Local Planning Authority for the Legacy Corporation Area up until 30th November 2024, is situated within east London across four boroughs; London Borough of Newham, London Borough of Waltham Forest, London Borough of Hackney and the London Borough of Tower Hamlets. .
- 2.3. Newham is strategically located at the intersection of the London-Stansted-Cambridge-Peterborough Corridor, which is centred on enterprise and innovation within emerging sectors such as digital, media, life sciences, telecommunications and advanced manufacturing, and the Thames Estuary Creative and Cultural Industries Corridor, which adds to the borough's significance. It contains three Opportunity Areas: the Olympic Legacy (which also includes parts of the other Host Boroughs) Poplar Riverside (which crosses the boundary with Tower Hamlets) and Royal Docks and Beckton, which is also the home of London's only Enterprise Zone and Europe's largest regeneration area.

3. Strategic geography

- 3.1. The map below identifies the spatial representation of the key strategic matters addressed, alongside the administrative area of the London Borough of Newham plan-making authority, and the LLDC temporary plan-making authority area.



- 3.2. As noted above, the LLDC is due to return planning powers back to the London Boroughs of Newham on the 1st of December 2024. Discussions are ongoing to facilitate the knowledge, governance and data transfer as part of transition arrangement. Where relevant, the Newham draft Local Plan has retained and evolved site allocations and designations from the LLDC Local Plan (2020).

4. Background

- 4.1. Newham Council has prepared the Draft Submission Local Plan (Regulation 19) and published it for consultation between 19th July and 20th September. This is the version of the plan that the Council considers to be 'legally compliant' and 'sound' and will be submitted to the Planning Inspectorate for examination in 2025. The council has undertaken two rounds of consultation prior to this, to inform the Newham Draft Submission Local Plan. These include:
- Issues and Options Consultation, which took place between 18 October and 17 December 2021; and
 - Draft Local Plan Consultation (Regulation 18), which took place between the 9 January and 20 February 2023.
- 4.2. A [Duty to Cooperate Statement](#) (DtC Statement) was published as part of Newham's Reg. 19 consultation, which provides a summary of our engagement with the LLDC, as a duty to cooperate partner, as part of the preparation of the new Newham Local Plan. The table below provides an extract of the relevant key strategic matters identified as part of this process and the corresponding paragraphs in the Duty to Cooperate Statement.

Key Strategic Matter	DtC Statement relevant paragraphs
Housing target	4.27, 4.29, 4.32, 4.36-4-38
Gypsy and Traveller need	4.42, 4.43, 4.47-4.50
Newham's Town Centres Network	4.87, 4.88, 4.92, 4.94-4.97
Stratford Station	4.112- 4.119
Metropolitan Open Land review	4.286, 4.288-4.292, 4.294-4.295
Sites of Importance to Nature (SINCs) review	4.310-4.312
LLDC Local Plan site allocations, including Bows Goods Yard and Three Mills	4.64, 4.68-4.70 4.74,-4.365-4.374

- 4.3. The national and regional policy context forming the background to this statement of common ground is also detailed in the Duty to Cooperate Statement (2024), under 'Chapter 2: Legislative and national policy context' and 'Chapter 3: Demonstrating compliance with the duty to cooperate'.
- 4.4. During the Reg. 19 consultation process, Newham approached the LLDC to agree the process leading to the preparation and signing of this statement of common ground

- 4.5. The LLDC raised further key matters through the response to Newham's Reg. 19 consultation, which relate to:
- The delivery of site allocations: Stratford Station, Pudding Mill Lane, Bridgewater Road and Rick Roberts Way
 - Proposed new site allocations at Stadium Island and Stratford Waterfront South - the Aquatics Triangle
 - Issues with wording of some Newham's Reg. 19 policies - D4: Tall Buildings, H3: Affordable Housing, Policy H4: Housing Mix, CE2: Embodied Carbon and CE3: Circular Economy.
- 4.6. A meeting was held on 29th October 2024 to discuss the key duty to cooperate strategic matters, and to begin to address comments raised by the regeneration arm of the LLDC. The agenda and notes of this meeting are attached as Appendix 1 and provide further background information. Further meetings will be agreed to progress a separate (part 2) SoCG with the LLDC in its ongoing role as a Mayoral Development Corporation and landowner.

5. Key Strategic Matters

5.1. Housing Target

- 5.2. Newham's and LLDC's housing targets are set out in the London Plan (2021). These targets were informed by the findings of the Greater London Authority's Strategic Housing Market Assessment and Strategic Housing Land Availability Assessment, both of which were published in 2017. Correspondence with the GLA has confirmed Newham's proportion of the LLDC's London Plan housing target, which is an additional 14,800 homes on top of Newham's target to deliver 32,800 homes by 2028/29.
- 5.3. In preparation for the transition of powers from the LLDC to Newham, and as part of the preparation of the new Newham Local Plan, the LLDC shared its housing trajectory position and phasing, which was informed by engagement with developers. This data was incorporated into the LBN trajectory at Regulation 18 stage, and while there have been some updates to phasing timescales due to planning activity that resulted in schemes coming forward earlier or later than the LLDC trajectory anticipated, overall the approach remains broadly aligned. The LLDC acknowledged that they had also experienced significant delays in starts and completions this year and over the past few years. The final LLDC housing trajectory was shared with Newham in November 2024 and will be used to check for consistency with the Local Plan Reg. 19 trajectory. This data will inform an updated housing trajectory to support the submission of the Local Plan to the Planning Inspectorate.
- 5.4. Newham's housing target in the Newham Draft Submission Local Plan proposes a range housing target, which seeks to deliver a net increase of between 51,425 and 53,784 quality homes between 2023 and 2038. Whilst Newham have identified sufficient housing capacity to meet our London Plan housing target, the projected phasing of delivery means that Newham will not be able to meet our London Plan housing target within the period of the London Plan. This is primarily as a result of delays to the delivery of large sites, particularly site allocations, against the assumed phasing in the 2017 Strategic Housing Land Availability Assessment. Further duty

to cooperate engagement with neighbouring boroughs and the GLA are ongoing and other statements of common ground will be signed to address this issue.

5.5. Record of agreements and/or disagreements:

- London Borough of Newham and the LLDC agree that the LLDC's housing trajectory was fed directly into LBN's housing trajectory.
- LLDC agreed that there have also been delays in housing delivery in their administrative area, as indicated in the 2023/24 [Authority Monitoring Report](#).

5.6. **Gypsy and Traveller need**

5.7. In December 2023, the Government updated the Planning Policy for Traveller Sites (PPTS). The new guidance has been published in response to the October 2022 Court of Appeal ruling, which found the previous 2015 PPTS to be unlawful in its discrimination against those forced to give up their nomadic lifestyles due to disability or old age.

5.8. As part of our Local Plan evidence base Newham has prepared a Gypsy and Traveller Accommodation Assessment, which found that there was no need for new pitches for households that meet the Planning Policy for Traveller Sites definition of Gypsies and Travellers. However, the study found a need for 23 pitches for households that did not meet the Planning Policy for Traveller Sites definition. The study looked at the need in the whole of the borough, including the area currently under LLDC planning powers.

5.9. The Newham Draft Submission Local Plan continues to allocate one site as a safeguarded Gypsy and Traveller accommodation site, which is an existing site containing 15 pitches. The safeguarding of this site does not count towards meeting identified future need, albeit there is scope to extend the site by a few pitches to the south of the allocation.

5.10. The LLDC Housing Requirements Study (2018) identified a net requirement for nine gypsy and traveller pitches within the LLDC area over the Plan period to 2036 plus a need for an additional 15 pitches arising from households falling within the (then) Draft New London Plan definition, but do not meet the planning definition defined within the Planning Policy for Traveller Sites (2015). The existing site at Chapman Road is safeguarded for gypsy and traveller accommodation uses to continue to contribute a supply of five pitches over the Plan period. The allocated site at Bartrip Street South is expected to be able to provide around nine new pitches therefore it has the potential to meet the needs of households who meet the planning definition over the plan period to 2036. Following the transition of planning powers from the LLDC to LBN, both these sites will sit within the administrative boundary of the London Borough of Hackney, whom Newham will engage with as part of duty to cooperate processes to progress any emerging opportunities to address the regional need for gypsy and traveller accommodation.

5.11. Record of agreements and/or disagreements:

- London Borough of Newham and the LLDC agree to continue to engage on this matter, as relevant to LLDC's ongoing role as a Mayoral Development Corporation and landowner.

- London Borough of Newham will pursue any further duty to cooperate engagement on fulfilling need for gypsy and traveller accommodation with the London Borough of Hackney.

5.12. **Newham's Metropolitan Open Land Review**

- 5.13. London Plan (2021) Policy G3, Metropolitan Open Land, of the London Plan sets out that Metropolitan Open Land (MOL) is afforded the same status and level of protection as Green Belt. Policy G3 requires boroughs to work with partners to enhance the quality and range of uses of MOL. The policy sets out that any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor of London and adjoining boroughs.
- 5.14. London Green Belt can be thought of as a permanent area of open land that surrounds the city whereas MOL relates to strategically significant open spaces within the built environment of London.
- 5.15. In 2022/23 Jon Sheaff and Associates and London Wildlife Trust, undertook an initial review of Newham's Metropolitan Open Land to regularise the existing designations, understand if there were any omissions and to ensure that the existing designations met the criteria of the NPPF and London Plan. On 12 September 2023 Newham met, in an online meeting, with neighbouring authorities, including the LLDC. There was universal support for the method and approach taken to Newham's Green Belt and MOL Review (Nov 2022), however the LLDC raised some concerns with regards to the MOL extension at the Queen Elizabeth Olympic Park. Newham undertook further email engagement with the LLDC, which resulted in some amendments to the proposed Queen Elizabeth Olympic Park MOL and corrections in mapping on the Policies Map from Reg. 18 to Reg 19. However, there remains a small area of proposed MOL which the London Legacy Development Corporation and Newham disagree on. This area of MOL, and the reasons for its designation as MOL, is set out Newham's Green Belt and Metropolitan Open Land Review (2024).
- 5.16. The remaining MOL disagreement relates to the MOL extension within the Bridgewater Road site. The revised Newham Green Belt and Metropolitan Open Land Review (2024) introduces a new parcel of MOL (A35 Waterworks river), which acts as an extension to the to the existing MOL parcel, at Olympic Park, Lea Valley (A32), that is different to the adopted LLDC 2020 Local Plan/Policies Map and, as noted by the LLDC, is also not in line with the consented planning applications for this site.
- 5.17. Record of agreements and/or disagreements:
- The LLDC broadly agrees with the methodology and outcomes of Newham's Metropolitan Open Land Review. However, LLDC and Newham disagree on the designation of a new parcel of MOL (A35 Waterworks river), where it overlaps with the Site Allocation for Bridgewater Road which also benefits from an extant planning permission.
 - Newham agrees that the revised Newham Green Belt and Metropolitan Open Land Review (2024) introduces a new parcel of MOL (A35 Waterworks river), which that is different to the adopted LLDC 2020 Local Plan/Policies Map and is also not in line with the consented planning application extant on the Bridgewater Road site allocation.

- LLDC and Newham will continue to work together through development management processes, where the LLDC is the landowner or where LLDC landholdings may be impacted by MOL designations in the emerging Newham Local Plan. Further details may form part of a separate SOCG with the LLDC in their role as a Mayoral Development Corporation and landowner.

5.18. **Newham's Town Centres Network review**

- 5.19. The National Planning Policy Framework (December 2023) Paragraph 90 sets out the requirements that planning policies must meet in order to protect and promote the vitality and viability of town centres.
- 5.20. London Plan (2021) Policy SD8 Town centre network sets out the London classification scales for town centres and the approach to managing these through development plans. It states that the classification of International, Metropolitan and Major town centres can only be changed through the London Plan, with potential future changes to the strategic town centre network set out in Annex 1 of the London Plan. Changes to District, Local and neighbourhood centres can be brought forward through Local Plans where supported by evidence in development capacity assessments and town centre health checks and subject to assessments of retail impact where appropriate. Annex 1 29 identifies the potential for Stratford to grow to an international classification, and for a new major centre to be created at Beckton Riverside, building on the comparison retail capacity of Gallions Reach Shopping Park.
- 5.21. In 2021, Newham commissioned Urban Shape to deliver a new Retail and Leisure Study to support the development of town centre and high streets policies and designations, in line with the national and regional policy requirements.
- 5.22. The Retail and Leisure Study (2022) was finalised in July 2022 and recommended the continued promotion of Stratford's growth to an International scale town centre and the retention of the current scale for all other Newham's town centres, and the continued commitment to delivery of new local centres alongside a review of existing and potential local centre designations to address gaps in the 400m catchment of the network.
- 5.23. Following completion of the Retail and Leisure Study (2022), work began on the review of the town centre network to address the recommendations of the study. The methodology and proposed boundary amendments are included in the Town Centre Network Review Methodology Paper 2022 and its Town Centre Network Review Methodology Paper Update 2024. These have been carried through into the Policies Map and Local Plan site allocations where relevant.
- 5.24. The LLDC have confirmed as part of the meeting held on 29th October (see Appendix 1) that they have no further concerns and support the town centre designations as set out in Newham's Reg. 19 Policies Map and Local Plan.
- 5.25. Record of agreements and/or disagreements:
- LLDC confirm their support for Newham's Reg. 19 Policies Map designations of town and local centres in the former LLDC planning area.

- Newham and the LLDC will continue to engage, where the LLDC has ongoing land ownership, to support the aspiration to deliver the vision for Stratford town centre and the creation of the new local centres.

5.26. **LLDC Local Plan (2020) site allocations**

- 5.27. The local planning authority shares a boundary with the LLDC, which acts as the planning authority for the Queen Elizabeth Olympic Park. The adopted LLDC Local Plan (2020) contains 14 site allocations that are in Newham.
- 5.28. The LLDC will return planning powers back to the London Boroughs of Newham, Tower Hamlets and Waltham Forest and Hackney by the 1st of December 2024. Newham have therefore been working with the LLDC and other partners through the development of the Local Plan, to plan proactively in advance of this transition, so that a Plan which covers the whole borough is under preparation at the point of transition. This Local Plan therefore covers the entirety of Newham.
- 5.29. The status of the LLDC allocated sites is varied, and Newham have worked closely with the LLDC Planning Policy team throughout the Local Plan process to understand and update the status of these sites. Newham have also engaged with the LLDC's development team. Newham have reviewed the LLDC Local Plan's site allocations in the context of our wider approach to site allocations to ensure a consistent approach (as outlined in the [Site Allocation and Housing Trajectory Methodology July 2024](#)) is taken to these sites. The majority of the sites continue to be allocated in the Newham Draft Submission Local Plan.
- 5.30. The LLDC have raised concerns about the de-allocation of two sites: Bow Goods Yard SIL and Three Mills.
- 5.31. With regards to Three Mills, the LLDC consider that a site allocation would help secure the viability of the studios proposed here, in particular to help balance the benefits of such enabling development with impact on the heritage assets. Newham maintains that the scale of development does not meet its site allocations methodology, and that this development could be managed by other policies in the plan and there is no need for a site allocation. Despite this Newham welcomes the LLDC's suggestion of new wording which could be added to the Neighbourhood policy or other policies in the plan.
- 5.32. With regards to Bows Goods Yard, the LLDC noted that there is a resolution to grant for an outline permission. The site is owned by Network Rail, but the LLDC have a site in close proximity, and retaining a site allocation for Bows Goods Yard would give certainty and protect amenity on adjacent sites. However, Newham maintained its position that the approach of the Newham Local Plan is to not assign site allocations on Strategic Industrial Locations, and to use employment policies to protect and promote employment intensification. The application subject to the resolution to grant includes industrial floorspace, which accords with the Newham Local Plan approach for the SIL designation. Development sites in close proximity to SIL will be expected to follow the agent of change principles set out in policy D6.2 of Newham's emerging Local Plan, in order to manage and mitigate the juxtaposition in an efficient way, while making best use of available land.

- 5.33. London Plan Policy E4 encourages boroughs to meet identified demand through the provision of new land and/or intensification of existing industrial floorspace as supported by appropriate evidence. It sets out the requirement to meet economic needs by the three categories of London's land and premises for industry, logistics and services, including the Strategic Industrial Locations (SIL), Locally Significant Industrial Sites (LSIS) and Non-Designated Industrial Sites. Policy E6 requires boroughs to designate and define Locally Significant Industrial Sites with range of acceptable use, as justified by evidence in local employment land reviews. Boroughs are required to protect and deliver the employment sites following the principle of intensification, co-location and substitution as set out in Policy E7 of the London Plan.
- 5.34. Newham conducted its own Employment Land Review to justify the designation of employment land in the borough. Employment land in Newham is designated as Strategic Industrial Locations which accommodate heavier industrial uses, warehouses and utilities, and Local Industrial Locations to house smaller scale, locally significant industrial areas. Co-location with residential and employment land uses is achieved in specific Local Mixed Use Areas. To review the suitability of the existing employment designations, Newham's Employment Land Review (ELR) was updated in July 2022. The findings in the ELR regarding employment land supply and demand in the borough as well as land audit on each designated employment site are used to inform the changes in the emerging Local Plan.
- 5.35. Newham has worked with the London Legacy Development Corporation (LLDC) and the London Borough of Tower Hamlets (LBTH) to address issues for Bow Goods Yard. LLDC's primary concerns have been ensuring improved connections into the site and managing amenity impacts arising from the juxtaposition of industrial and residential uses. Newham confirmed these issues would be secured through the neighbourhood policies and agent of change policies in the emerging Local Plan, rather than a site allocation.
- 5.36. Record of agreements and/or disagreements:
- LLDC and Newham will continue to work together through development management processes on bringing forward the schemes at Three Mills and Bows Goods Yard, where the LLDC is the landowner or where LLDC landholdings may be impacted by neighbouring allocations or designations in the emerging Newham Local Plan. Further details may form part of a separate SOCG with the LLDC in their role as a Mayoral Development Corporation and landowner.
- 5.37. **Stratford Station**
- 5.38. Stratford Station, along with Stratford's two bus stations, form a key strategic public transport interchange for London. It has become the fifth busiest station on the entire National Rail network, the sixth busiest station on TfL's network, and is also the busiest bus station in London. Since 2001, Stratford Station has seen the largest absolute amount of passenger growth of any station in the UK.
- 5.39. The station was not designed to accommodate the volume of passengers now using it and this has resulted in unacceptable levels of overcrowding, regular station closures and poor passenger experience.

- 5.40. In 2019, the London Legacy Development Corporation (LLDC), Newham, Network Rail and Transport for London (TfL) started to prepare a Strategic Outline Business Case (SOBC) for the long-term redevelopment of the station and the surrounding area to address capacity and connectivity issues.
- 5.41. The Proposed Submission Local Plan includes a site allocation for the Stratford Station site, which set out infrastructure requirements and development and design principles for different plots. The LLDC have raised concerns with regards to the reference in the policy to decking at Stratford Station, noting changing aspirations for the delivery of the scheme.
- 5.42. The Strategic Outline Businesses Case was submitted to the Government in July 2023. Further work is being undertaken to develop this work and Newham will continue to work with the LLDC to support this work and to ensure the Local Plan can support the delivery of necessary station infrastructure. Newham is committed to ensure suitable alignment between the emerging Plan and the business case.
- 5.43. Record of agreements and/or disagreements:
- LLDC and Newham will continue to work together on bringing forward the redevelopment of Stratford Station to facilitate the infrastructure requirements. Further details will form part of a separate SOCG with the LLDC in their role as a Mayoral Development Corporation and landowner.
- 5.44. **Rick Roberts Way**
- 5.45. The Newham Built Leisure Needs Assessment (2024) identified Rick Roberts Way as a location where a leisure facility would be suitable and needed. The study found paddle tennis was an increasing popular leisure use and that we should be looking for a permanent location.
- 5.46. The LLDC has noted that the existing padel tennis facility at Rick Roberts Way is an interim use and with a temporary planning permission. The site allocation and existing planning permission for the site is for residential-led development as part of the Legacy Communities Scheme and more recently, there are planning obligations to submit a slot-in application with an increase in housing, including affordable housing.
- 5.47. The LLDC has also noted that the site allocation, which includes land owned by LLDC, the London Borough of Newham and National Grid has been subject to much discussion between the parties. This includes a jointly commissioned and agreed Urban Design and Landscape Framework (UDLF) which reflects the requirement for residential-led development on both the LLDC and National Grid sites and a school on the London Borough of Newham's site. It is the LLDC's view that the proposed inclusion of a leisure facility, particularly if it is to 're-provide' the temporary padel tennis use, would adversely impact on the ability to achieve the planned development of the site, including LLDC's obligations to increase housing and affordable housing on its land.
- 5.48. It was also noted that LLDC has a Deed of Covenant through a land swap agreement with Newham (as landowner) for how the Rick Roberts Way site should be divided between LLDC and Newham, as well as what uses each party is proposing to deliver within their land ownership.

5.49. The LLDC has therefore raised concerns through the Reg 19 consultation process that the wording of the policy needs to be amended to clarify that the leisure use would be new (rather than re-providing what is currently a temporary use on site) and to provide better information about its scale. They suggested that Newham should consider priorities for the mix of uses on this site to reflect existing planning permissions and obligations as well as the UDLF. It was also suggested that alternative Newham-owned sites to deliver the leisure use should be considered.

5.50. Record of agreements and/or disagreements:

- LLDC disagrees with the inclusion of a leisure facility within the site allocation.
- LLDC and Newham will continue to work together through development management processes to bring forward the development site at Rick Roberts Way. Further details may form part of a separate SOCG with the LLDC in their role as a Mayoral Development Corporation and landowner.

5.51. **Bridgewater Road**

5.52. During the meeting held on 29th October 2024, Newham noted LLDC's concerns with some of the wording of this site allocation, as set out in the written representation submitted by the LLDC at Newham's Reg. 19 Local Plan consultation. Due to lack of time, this was not discussed in detail at the meeting and it was acknowledged that a follow-up meeting may be required. However, the LLDC did raise concerns about the proposed Sites of Importance to Nature (SINC) designation extension on the Bridgewater Road site allocation, which they stated conflicts with the existing outline permission.

5.53. SINC's are those areas of land which are recognised as being of particular importance for wildlife and biodiversity. Although a non-statutory designation, SINC's are afforded a high level of protection within the planning system.

5.54. The NPPF 2023 highlights the importance of open space in delivering wider benefits to nature and helping to address the impact of climate change.

5.55. London Plan Policy G6, Biodiversity and access to nature, sets out the Sites of Importance to Nature (SINC's) should be protected and that Borough, in developing Local Plans, should use up-to-date information about the natural environment and the relevant procedures to identify SINC's.

5.56. An assessment of Newham's SINC's was undertaken by London Wildlife Trust between June-August 2022 to inform the Draft Local Plan. This involved a desk-top review of existing information about Newham's SINC's (including those within the area currently administered by the London Legacy Development Corporation) and analysis of aerial imagery followed by site visits to existing SINC's and other sites identified by the desk-top study. The review has systematically looked at the current SINC designations and identified potential changes to boundaries or status, and justify these changes as necessary. It has also identified and justified potential new SINC's to reduce areas of deficiency, contribute to strategic green corridors or complement existing SINC's. Newham took the SINC Review (2022) to the September 2023 London Wildlife Sites Board. At this meeting, the work was praised for its quality and

thoroughness. There was unanimous agreement from the Board to approve the Newham SINC Review (2022).

5.57. The Newham SINC Review proposed a minor extension to the Greenway SINC (Reference NEB16 The Greenway). The only comments received by Newham from the LLDC at Regulation 18 stage on the Bridgewater Road site allocation appeared to relate solely to the new MOL designation (see 5.12 above) and not to the proposed SINC expansion to the south west of the site. This SINC was therefore included in the submission to the London Wildlife Board, where it was part of the approved designations for the plan.

5.58. Record of agreements and/or disagreements:

- LLDC do not agree to the designation of the minor extension to the Greenway SINC (Reference NEB16 The Greenway) on part of the Bridgewater site allocation.
- LLDC and Newham will continue to work together through development management processes to bring forward the development site at Bridgewater Road. Further details may form part of a separate SOCG with the LLDC in their role as a Mayoral Development Corporation and landowner.

5.59. **Pudding Mill Lane**

5.60. During the meeting held on 29th October 2024, Newham noted LLDC's concerns with some of the wording of this site allocation, as set out in the written representation submitted by the LLDC at Newham's Reg. 19 Local Plan consultation. Due to lack of time, this was not discussed in detail at the meeting and it was acknowledged that a follow-up meeting may be required.

5.61. Record of agreements and/or disagreements:

- LLDC and Newham will continue to work together through development management processes to bring forward the development site at Pudding Mill Lane. Further details may form part of a separate SOCG with the LLDC in their role as a Mayoral Development Corporation and landowner.

5.62. **Proposed LLDC site allocations: Stratford Waterfront South - the Aquatics Triangle**

5.63. Newham has set out its wider methodology to site allocations to ensure a consistent approach (as outlined in the [Site Allocation and Housing Trajectory Methodology July 2024](#)) is taken to these sites.

5.64. The Aquatics Triangle site was originally submitted in the call for sites as a standalone additional site. When it was assessed, the impact on open space and the setting of the Aquatics Centre meant that it could only accommodate a small quantity of development and did not meet the tests to be a site allocation. The LLDC's development team re-submitted the site as an addition to Stratford Waterfront South site as part of their comments to Newham's Reg. 19 consultation. This approach may have made the site more deliverable as a site allocation, however this can no longer be considered at this late stage in the plan-making process, as it would require substantial additional work, including of the Integrated Impact Assessment and the evidence base supporting the Newham Local Plan.

5.65. The LLDC have confirmed as part of the meeting held on 29th October (see Appendix 1) that the site could come forward within the plan period and that they have undertaken significant

testing and work with the LLDC as local planning authority and the Quality Review Panel to develop the scheme. Newham have confirmed its view that the lack of a site allocation in the emerging local plan would not prevent the site coming forward.

5.66. Record of agreements and/or disagreements:

- LLDC maintain that a Site Allocation is required for the site.
- LLDC and Newham will continue to engage through development management processes on how best to deliver the site in line with the objectives in the Newham Local Plan. Further details may form part of a separate SOCG with the LLDC in their role as a Mayoral Development Corporation and landowner.
- It is noted that E20 Stadium LLP, an LLDC owned subsidiary which owns the London Stadium will transfer to the GLA from 1 April 2025. However, LLDC will remain the freeholder of the site. Future discussions will therefore be required with both LLDC and E20 Stadium LLP.

5.67. **Proposed LLDC site allocations: Stadium Island**

5.68. The Stadium Island site was submitted as a new site allocation as part of the Reg. 19 consultation. The LLDC have confirmed as part of the meeting held on 29th October (see Appendix 1) that they have undertaken a feasibility study which would benefit the support of a site allocation. Newham have confirmed its view that the lack of a site allocation in the emerging local plan would not prevent the site coming forward.

5.69. Newham has followed due process to develop the Local Plan, including running a Call for Sites, Issues and Options consultation and the Regulation 18 consultation. Newham has set out its wider approach to site allocations to ensure a consistent approach (as outlined in the Site Allocation and Housing Trajectory Methodology July 2024) is taken to these sites. The Stadium Island site was submitted a month before the Regulation 19 Local Plan went to Cabinet and therefore wasn't able to be considered for this Local Plan.

5.70. Record of agreements and/or disagreements:

- LLDC maintain that a Site Allocation is required for the site.
- LLDC and Newham will continue to engage through development management processes on how best to deliver the site in line with the objectives in the Newham Local Plan. Further details may form part of a separate SOCG with the LLDC in their role as a Mayoral Development Corporation and landowner.

5.71. **LLDC's proposed changes to Newham's Reg. 19 Local Plan Policies**

5.72. During the meeting held on 29th October, Newham noted LLDC's concerns with some of the wording of policies D4: Tall Buildings, H3: Affordable Housing, Policy H4: Housing Mix, CE2: Embodied Carbon and CE3: Circular Economy, primarily relating to the role of the LLDC as a landowner and developer. The notes of the meeting, at Appendix 1, summarise Newham's and LLDC's position on the scope of these policies, which were only briefly addressed, pending a further detailed discussion at a future meeting. Further details may form part of a separate SOCG with the LLDC in their role as a Mayoral Development Corporation and landowner

5.73. During the meeting, Newham also offered to further discuss with the LLDC the requirements of policy D5 Neighbourliness, which set out how developments requiring an agent of change approach will be managed and which may help the LLDC understand how developments adjacent to Bow Goods Yard will be protected (see issue outlined in paragraphs 5.31 – 5.34 above).

5.74. Record of agreements and/or disagreements:

- LLDC and Newham will continue to work together to enable the delivery of site allocations and other shared objectives in the Newham Local Plan. Further details may form part of a separate SOCG with the LLDC in their role as a Mayoral Development Corporation and landowner.

6. Governance agreements

- 6.1. Following the transfer of powers back to Newham from 1st December 2024, the duty to collaborate between plan-making authorities, as prescribed through national policy and law, will cease to apply to the LLDC. Therefore, this is the only SOCG with LLDC as a duty to cooperate partner, and no further governance arrangements apply as required under the NPPF.
- 6.2. A further SOCG may be undertaken at a later date as the Newham Local Plan progresses towards submission for examination, in order to work together to address concerns raised by the LLDC in its role as a Mayoral Development Corporation and landowner. However, this process will sit outside of the NPPF duty to cooperate requirements.

7. Signatories

- 7.1. We confirm that the information in this statement and referred to documents reflects the joint working to date undertaken between London Borough of Newham and the London Legacy Development Corporation, pre-transition of planning powers, towards addressing the identified strategic matters.

Signed on behalf of London Borough of Newham:  Name: Ellie Kuper Thomas Date: 29 th November 2024 Position: Policy Manager, Planning & Development Directorate	Signed on behalf of London Legacy Development Corporation in its role as the local planning authority to 1st December 2024:  Name: Alex Savine Date: 29 th November 2024 Position: Head of Planning Policy & Infrastructure	Signed on behalf of London Legacy Development Corporation in its role as a Mayoral Development Corporation and landowner:  Name: Ramona Kayindu Date: 29 th November 2024 Position: Planning Manager
--	--	--

**Appendix 1: Agenda and minutes of Statement of Common Ground
meeting held on 28th October 2024**

**Statement of Common Ground between:
London Borough of Newham and London Legacy Development Corporation**

Meeting Date: 28.10.2024

Time: 15:00-16:30

Venue: Microsoft Teams

Present:

- Ellie Kuper Thomas, Policy Manager, LBN
- Lily Mahoney, Principal Planner, LBN
- Rory Douds, Planner, LBN
- Alex Savine, Head of Planning Policy and Infrastructure, LLDC
- Marina Milosev, Principal Planner
- Irene Man, Director of Planning Development Management, LLDC
- Ramona Kayindu, Planning Manager Development Management, LLDC
- Hassan Ahmed, Strategic Planning Team Leader, GLA (present until item 4)

Agenda and Notes

Agenda Item	Notes [context, position statements, areas of agreement and/or disagreement]	Actions emerging [what, who, and any deadline]
1. Introductions (2min)	• Self-introduction by the LBN and LLDC teams and GLA representative. • LBN introduced the objective of the meeting. • LBN shared the agenda of the meeting.	
2. Cooperation to date (5min)	• LBN stated that they considered it would be useful for the Examiner to understand the work undertaken to date between the LLDC and LBN in sharing data to support plan preparation, especially as the examination would take place after transition. • It was agreed to include a summary of this work in the Statement of Common Ground. • LBN also explained they had invited the GLA to attend this part of the session so they could also have an understanding of how the LLDC's housing targets have fed into LBN's plan. • The GLA stated that they were content with the numbers as provided, but agreed that it may be useful for the Inspector to have further detail. • LBN asked for an updated date for the LLDC to provide the remaining LLDC data before transition.	LLDC and LBN agreed that there has been ongoing positive collaboration and data sharing to inform the LBN Local Plan; this will be added to the Statement of Common Ground. LLDC to share housing data by 05/11/2024 and remaining data by 08/11/2024.

Agenda Item	Notes [context, position statements, areas of agreement and/or disagreement]	Actions emerging [what, who, and any deadline]
	LLDC confirmed that it will provide the LLDC housing data by 05/11/2024 and the remaining LLDC data by 08/11/2024. The housing trajectory shared will be the latest position.	
3. Housing target and phasing (10min)	- LBN set out the context of the housing target and phasing: - In 2022, in preparation for the Regulation 18 Draft Local Plan, the LLDC shared its housing trajectory position and phasing, which was informed by engagement with developers. - This data was incorporated into the LBN trajectory and while there have been some minor updates to phasing timescales due to schemes coming forward earlier or later than the LLDC trajectory anticipated, overall the approach remains the same. - The next stage is to compare the updated LLDC housing trajectory and the LBN Regulation 19 Local Plan trajectory to check for consistency. - LBN requested a discussion about delays to delivery and starts and completions. - The LLDC stated that they had also experience significant delays in starts and completions this year and over the past few years and agreed it would be useful to acknowledge delays to delivery in the Statement of Common Ground. - The GLA clarified that the conformity issue on LBN housing delivery wasn't due to delivery numbers, but to the lack of commitment to meet the Mayor's target up to 2029. Despite the shortfall, it was the GLA's view that LBN could commit to making up for this as soon as possible after 2029. - It was agreed that LBN and the GLA would explore this in a separate Duty to Cooperate Meeting and Statement of Common Ground. - The GLA also outlined that it is creating a new SHLAA and feedback from that process would also feed into the Statement of Common Ground with the GLA.	LLDC and LBN agreed that the LLDC's housing trajectory was fed directly into LBN's housing trajectory; this will be added to the Statement of Common Ground. LLDC agreed that there have also been delays in housing delivery; this will be added to the Statement of Common Ground. LBN and GLA agreed to hold another meeting to discuss the housing trajectory, housing target and conformity issue.

Agenda Item	Notes [context, position statements, areas of agreement and/or disagreement]	Actions emerging [what, who, and any deadline]
4. Existing LLDC site allocations: Three Mills and Bow Goods Yard (15 min)	• LBN clarified their position on existing LLDC site allocations: ○ All existing LLDC sites were assessed during the development of the LBN Local Plan. Some sites, identified as allocations in the LLDC Local Plan, when undertaking the Newham Local Plan Review and assessed using the LBN site allocation criteria, no longer met the site allocation test and have therefore not been taken forward. ○ Bow Goods Yard SIL – LBN have not allocated any sites that are SIL due to having dynamic employment policies that will deliver the aspirations of these sites and it was concluded that Bow Goods Yard SIL did not meet the site allocation tests. ○ Three Mills – LBN’s Local Plan review identified that very little development was proposed at Three Mills and therefore didn’t meet the tests for a site allocation. The Three Mills Neighbourhood Policy sets out guidance to help protect and deliver the ambitions of this area. • LLDC clarified their position on Three Mills site: ○ The development side of LLDC view the need for policies on Three Mills to support the future viability of the studios, which isn’t clear in the Newham Local Plan policy. ○ LLDC clarified its position that a site allocation would help secure the viability of the studios at Three Mills. In particular, to help balance the benefits of such enabling development with impact on the heritage assets. • LBN contends that this development could be manage by other policies in the plan and there is no need for a site allocation. Despite this LBN welcomed the LLDC suggestion that any wording which could be added to the Neighbourhood policy or other policies in the plan.	LLDC and LBN will have a further meeting to discuss both Three Mills and Bow Goods Yard and whether existing policies can deliver LBN and LLDC’s shared objectives for these sites. At this meeting, the LLDC could propose additional wording to be added to the Local Plan, which would then be added to a future Statement of Common Ground and proposed as a modification. LBN may consult Historic England with regards to any proposed wording which would impact the heritage assets at Three Mills. LLDC and LBN will continue to work together on the bringing forward these schemes, where the LLDC has ongoing land ownership.

Agenda Item	Notes [context, position statements, areas of agreement and/or disagreement]	Actions emerging [what, who, and any deadline]
	• LLDC suggested LBN could add wording to Three Mills in neighbourhood policy on the studio scheme's future role in the area for the economic use and the need to invest in buildings with a heritage value. • It was agreed that further discussions could take place regarding this wording. • LLDC clarified their position on Bow Goods Yard site: ○ LLDC clarified that Bow Goods Yard has a resolution to grant for an outline permission. This site will be handed over to LBN to support implementation. The site is owned by Network Rail, but the LLDC have a site in close proximity and a site allocation would give certainty and protect amenity on adjacent sites. • LBN clarified their position on Bow Goods Yard site: ○ LBN isn't assigning site allocations for SIL sites. The wider objectives in the LLDC Local Plan (i.e. connectivity) have been captured in the Neighbourhood policy. ○ LBN clarified that it has many industrial sites and many are in close proximity to residential development. LBN can show LLDC the policy wording it uses to manage this juxtaposition between industrial and residential sites. • It was agreed that further discussions could take place regarding LBN suite of policies which would be used to manage this development.	
5. Newham's Town Centres Network (5min)	• LBN sought clarification that all LLDC's comments on the Town Centre network at the Regulation 18 stage have been adequately addressed. • LLDC stated this was the case and agreed to add wording to the Statement of Common Ground acknowledging that comments and concerns from the Regulation 18 Local Plan have been addressed.	Wording will be added to Statement of Common Ground acknowledging that comments and concerns from the Regulation 18 Local Plan have been addressed.
6. MOL & SINC Reviews (5min)	• LBN outlined our review of our MOL boundaries. This was discussed in advance	LLDC agreed to review the MOL

Agenda Item	Notes [context, position statements, areas of agreement and/or disagreement]	Actions emerging [what, who, and any deadline]
	of the Regulation 18 consultation with all affected boroughs and the GLA. • We're aware that at that stage the LLDC objected to the proposed amendment to the QEOP MOL boundary, but we retain our position that this meets the tests in the London Plan. • However, following feedback from the Regulation 18 consultation, LBN published a full MOL assessment at Regulation 19. The full MOL assessment, including reviews of the sites we decided to retain un-amended. • To ensure full compliance with the London Plan, LBN is seeking LLDC's confirmation that it is satisfied with that assessment. • The LLDC agreed it would review the MOL assessment. • The LLDC development team sought clarification regarding the change in SINC boundary at Pudding Mill Lane site allocation. • LBN confirmed that the SINC review has been approved by the GLA, but that the rationale could be discussed at a future meeting.	review and will confirm whether they have any comments or are satisfied with the assessment. LLDC and LBN will meet at a later date to discuss SINC's, if needed.
7. Proposed LLDC site allocations: Stadium Island and Stratford Waterfront South - the Aquatics Triangle (15min)	• LBN clarified their position on the proposed LLDC site allocation for Stadium Island: ○ LBN has followed due process to develop the Local Plan, including a Call for Sites, Issues and Options consultation and the Regulation 18 consultation. ○ The Stadium Island site was submitted a month before the Regulation 19 Local Plan went to Cabinet and therefore wasn't able to be considered for this Local Plan. • LLDC clarified their position on Stadium Island Proposed Site: ○ LLDC position is to pursue this site allocation. But will also consider if their objectives could be delivered through a planning brief, outside the local plan process. They also asked if this could be added to the plan in the future.	LLDC and LBN agreed that the Statement of Common Ground should outline the timeline and assessment process, clarifying that they aren't preventing the sites coming forward; rather, that the nature and timing of the sites, didn't meet site allocation tests. Ongoing discussions with the wider LBN planning service can occur regarding these sites and how best to deliver them in line with the objectives in the LBN Local Plan.

Agenda Item	Notes [context, position statements, areas of agreement and/or disagreement]	Actions emerging [what, who, and any deadline]
	○ LLDC want to enable more 24hr use of the site, not just football and summer events. ○ The stadium management will be going to the GLA in March, so we will also need to involve the GLA. ● LBN clarified their position on the proposed LLDC site allocation Aquatics Triangle: ○ This was originally submitted in the call for sites as a standalone additional site. ○ When it was assessed, the impact on open space and the setting of the aquatics centre meant that it could only accommodate a small quantity of development and did not meet the tests to be a site allocation. ○ LBN noted that the site has now been submitted as an addition to Stratford Waterfront South, which may have made it more deliverable, but the opportunity to add and amend sites has passed. ● LLDC clarified their position on Aquatics Triangle Proposed Site: ○ LLDC reiterate that it could come forward as a site and that they have undertaken significant testing and work with the LLDC's design panel to develop the scheme.	LBN will involve the GLA on the Stadium Island site once it is handed over in March 2025.
8. Proposed changes to allocated sites: Stratford Station, Bridgewater Road, Pudding Mill and Rick Roberts Way (15min)	● LBN clarified their position on the LLDC's proposed changes to site allocations: ○ LBN stated that this discussion was occurring earlier than they would have ideally liked due to the transition date and as these discussions primarily related to the LLDC's development function. As such this would remain a high level discussion and future discussion on sites and policy comments could occur in the future once all consultees' representations have been considered. ○ Rick Roberts Way – the Built Leisure Needs strategy identified this as a location where this use would be suitable and needed. LBN's leisure study	LBN agreed to a further meeting to discuss the leisure use at Rick Roberts way and address any concerns regarding the land swap agreement and proposed site allocations.

Agenda Item	Notes [context, position statements, areas of agreement and/or disagreement]	Actions emerging [what, who, and any deadline]
	found paddle was an increasing popular leisure use and that we should be looking for a permanent location. ○ Stratford Station - The proposed text regarding the decking over the rail lines could potentially be softened. There are concerns around deliverability of the site, LBN is committed to ensure that there is no contradictory information in the emerging Plan and business case. ● LLDC clarified their position on proposed changes to site allocations: ○ LLDC has no issue with leisure provision on Rick Roberts Way. ○ The issue is with the wording “‘re-provide’, as the current use is temporary. ○ LLDC’s review of the evidence base suggests it is unclear what scale of leisure use is needed at the Rick Roberts site, and a further meeting is needed. ○ LLDC has a land swap agreement with Newham for how uses were to be divided between LLDC and Newham. ● LBN needs to consider priorities for this development and can review deliverability of uses and scale of leisure and alternative locations. ● LLDC suggested an alternative location for the leisure use, could be on a LBN site which doesn’t have current plans.	
9. Policy D4: Tall Buildings (10min)	● LBN clarified their position on Tall Building policy D4: ○ The London Plan requires boroughs to identify tall building zones and maximum heights, so we will not be removing these. ○ LBN has undertaken extensive work to develop a robust policy position on building heights, which is consistent across the borough. ○ The Characterisation Study looked at the whole borough and its context to identify the location of tall building areas. The Tall Building Annex has been produced since Regulation 18 to	LBN and LLDC agreed to hold a further meeting to discuss the specific wording and parameters of building heights.

Agenda Item	Notes [context, position statements, areas of agreement and/or disagreement]	Actions emerging [what, who, and any deadline]
	document how those Tall Building Areas were identified. • LLDC clarified their position on Tall Building policy D4: ○ LLDC views LBN's approach as too prescriptive, due to the resulting loss of significant potential benefits for housing and affordable housing. ○ The LLDC is not seeking a removal of maximum heights. The GLA has set a threshold; but allows for flexibility that anything above that meets specific policy tests. ○ LLDC notes that there are some sites with extant permissions that are higher than the max identified in the LBN Local Plan. ○ LLDC suggested a modification to the Plan that existing extant permissions are considered when looking at building heights. • LBN clarified its position: ○ We acknowledge that the London Plan allows for development of a greater height than the maximum heights caps, if they meet the relevant tests in the London Plan policy. However, this requires maximums to be provided. ○ LBN was of the view that the LLDC had suggested to remove heights from certain tall building zones and sites, so was pleased to hear the LLDC was moving away from that position. ○ LBN also noted that there are a range of sites across the Plan where the maximum heights are lower than extant schemes. This was because the policy position is changing between the current and future Plans, supported by far more detailed evidence on character and height. We acknowledge that extant schemes can still be built out, but are attempting to continue to influence future schemes to deliver a more coherent spatial strategy in the borough.	

Agenda Item	Notes [context, position statements, areas of agreement and/or disagreement]	Actions emerging [what, who, and any deadline]
	The LLDC's suggestion to remove heights was not accepted, however it was agreed to have a further conversation on the specific wording and parameters of building heights. LLDC want guidance on developments that exceed heights in LBN's new policy.	
10. Policy H3: Affordable Housing (10min)	- LBN clarified their position on Affordable Housing policy H3: - LBN recognises the challenges posed by this policy; however, it is a direct response to the context in Newham, which has the highest temporary accommodation levels in the country and steeply rising unaffordability across the borough. - The policy approach allows viability assessments to support the deliverability of affordable units on site, but sets clear ambitions regarding the type of housing the Council wishes to promote across the borough. - The LLDC acknowledged this position, but continued to highlight the delivery challenges this causes.	
11. Policy H4: Housing Mix (10min)	- LBN clarified their position on Housing policy Mix H4: - The evidence base to support the Newham Local Plan review identifies a need for 60% family homes across the borough. However, LBN are aware that this is a high proportion and could affect overall deliverability; that is why the slightly decreased proportion of 40% is being taken forward in the policy. - There is a significant waiting list for larger housing, so we have set additional policy wording to address these needs. - The LLDC acknowledged this position, but continued to highlight the delivery challenges this causes, in particular in	LBN will set out in Statement of Common Ground the context regarding flexibility when a scheme provides other major benefits, such as infrastructure for the LLDC to consider and confirm if this addresses their concern.

Agenda Item	Notes [context, position statements, areas of agreement and/or disagreement]	Actions emerging [what, who, and any deadline]
	relation to site allocations which are also delivering infrastructure. LBN clarified that additional flexibility has been added to BFN4 in the regulation 19 Local Plan, which acknowledges that in certain circumstances, the delivery of infrastructure has to be prioritised.	
12. Policies CE2 and CE3: Embodied Carbon and the Circular Economy (5min)	- LBN clarified their position on policies CE2 and CE3: - LBN acknowledges that the LLDC is supportive of this policy. - LBN confirmed that if LLDC have specific queries regarding decarbonisation strategies they will be happy to provide support - LBN will not support fossil fuels and heat networks beyond the life of the plan. - LLDC welcomes LBN's position and seeks clarification in the policy regarding which measures LBN is considering. - LLDC clarified their position on policies CE2 and CE3: - LLDC emphasises that the key issue is flexibility in scope to allow for decarbonisation. Methods that may be deployed currently may not be used in the future and vice versa, so it is essential to agree a decarbonisation approach and see that it is implemented, but not be too detailed on how. - The Council will not support development that will use fossil fuels in a heat network beyond the lifetime of the Plan. LBN has a climate change target to be net zero for council operations by 2030 and net zero in Newham by 2045. - LBN is seeking to pressure the operator through the Local Plan.	
13. AOB (3min)	LBN made a request regarding the Joint Waste Plan. It stated that in the JWP discussions with the GLA, the GLA were seeking further evidence of compensatory	LBN will write up the minutes and a first full draft of the

Agenda Item	Notes [context, position statements, areas of agreement and/or disagreement]	Actions emerging [what, who, and any deadline]
	capacity being found for waste sites which were due to be lost. One such site is the LLDC waste site, 12 Barbers road. LBN understood that additional evidence was presented with the application to support the loss, but we do not have a copy of this. Please could it be shared.	Statement of Common Ground. LBN would like formal agreement on these documents before the transition of the LPA function. For outstanding items, a Statement of Common Ground part 2 will be created, which can be addressed with the LLDC development team beyond transition. Once the Statement of Common Ground is reviewed and agreed upon, the LLDC can provide an LPA letter of comfort. LLDC will provide LBN with evidence from the 12 Barbers Road waste site application.