

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/028	Vision and objectives	Key diagram														Object The Site is marked as Green Space. This description does not reflect the fact that it is not publicly accessible, nor does it have any amenity value. By virtue of the potential for positive change we advocate the designation of Lady Trower’s Trust Playing Field alongside the former East Ham Gas works as a Transform Area, with a focus upon utilising residential development to enable the enhancement of the Metropolitan Open Land as a high quality publicly accessible space.		A change to this policy approach has not been made. We did not consider this change to be necessary as the key diagram is illustrative of Newham's existing green space, including green space which is not publicly accessible. Lady Trowers Playing Fields is designated as a green space, it is Metropolitan Open Land and is a Site of Importance for Nature Conservation. The Council is satisfied that the plan remains sound without the proposed change.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/010	Vision and objectives	Key diagram														2.2 St William previously made comments in relation to the key diagram on page 24, which previously incorrectly displayed the extent of the previously developed land on the former gasworks site in East Ham. The Regulation 19 draft of the Local Plan has updated this key diagram again which now doesn’t show any previously developed land on this diagram. St William requests that the map is updated to ensure it is an accurate representation of this site particularly in light of its allocation in the Local Plan.		The error on the Key Diagram is noted. The Council proposes to support your suggested mapping change to the Key Diagram, so it reflects the latest MOL boundaries, which will be presented to the Inspector for their consideration.
Reg19-E-200	London City Airport		Reg19-E-200/027	Vision and objectives	Key diagram														Key Diagram and Policies Map The Key Diagram, provided at Page 24 of the Draft Local Plan, places a ‘Green Space’ allocation over parts of the airport, including along the newly constructed apron area, the parallel taxiway, and in the new terminal slab. Similarly, the Policies Map shows the same overlapping area designated as SINC. This allocation is likely to simply be a reflection of the previous airport boundary and not the current layout with the additional infrastructure completed in 2020. As operational land, this overlap needs to be amended. Additional detail is provided in Annex 2.		The error on the Key Diagram and Policies Map is noted. The Council proposes to support your suggested mapping change to the Key Diagram and the Policies Map, which will be presented to the Inspector for their consideration. This change will also be reflected in the Green and Water Infrastructure Strategy 2025.
Reg19-E-200	London City Airport		Reg19-E-200/030	Vision and objectives	Key diagram														Key diagram shows green space designation over part of the operational airport site.An area of the eastern aircraft stands and the parallel taxiway to the east of the terminal has been shown with a ‘green space’ designation. This appears to have been done erroneously and should be rectified. Key areas are highlighted at Annex 2.	Amend the key diagram layout to remove any green space designation from the LCY site, reflecting the fact that this is airport operational land.	The error on the Key Diagram and Policies Map is noted. The Council proposes to support your suggested mapping change to the Key Diagram and the Policies Map, which will be presented to the Inspector for their consideration. This change will also be reflected in the Green and Water Infrastructure Strategy 2025.
Reg19-E-200	London City Airport		Reg19-E-200/032	Vision and objectives	Key diagram														Key diagram water boundary appears to be inaccurateThe Royal Docks water boundary to the south of the apron has been shown overlapping the current land boundary, as well as partially shown as green space. This appears to have been done erroneously and should be rectified. Key areas are highlighted at Annex 2.	Amend the key diagram layout to remove water and green space designation to the south-east of the terminal location (i.e. immediately north of City Aviation House), reflecting the fact that this is airport operational land.	The error on the Key Diagram and Policies Map is noted. The Council proposes to support your suggested mapping change to the Key Diagram and the Policies Map, which will be presented to the Inspector for their consideration. This change will also be reflected in the Green and Water Infrastructure Strategy 2025.
Reg19-E-011	Southern Housing		Reg19-E-011/002	Vision and objectives															Overall, we support the approach and broad aims of the draft submission plan.		Comment noted.

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Reg19-E-015	Greater London Authority		Reg19-E-015/002	Vision and objectives															General The draft Local Plan is underpinned by seven broad objectives. These ambitions include a healthier Newham, ageing well, and people friendly neighbourhoods with green and clean streets. The objectives are very closely aligned with the Mayor’s Good Growth objectives, especially GG1 building strong and inclusive communities and GG3 creating a healthy city.		Comment noted.
Reg19-E-059	LB Hackney		Reg19-E-059/002	Vision and objectives							Blank	Blank						Blank	Hackney supports the overall vision and strategic objectives as set out in the Local Plan. We would welcome a follow up meeting over the coming weeks to discuss Duty-to-Cooperate matters in more detail.		Comment noted.
Reg19-E-081	Metropolitan Police Service - Designing Out Crime		Reg19-E-081/022	Vision and objectives				Objective 4			Blank	Blank						Blank	[Appendix 1: Supporting Policies Specifically Relating to Crime Prevention Draft Submission Local Plan (Regulation 19 June 2024)] Vision and Objectives page 22 4. Safer Newham where no-one feels at risk of harm Crime and fear of crime will be reduced and safe spaces and streets will be created through better, more inclusive, design of the public realm, including green and open spaces.		Comment noted.
Reg19-E-112	SEGRO	Gerald Eve	Reg19-E-112/002	Vision and Objectives							Blank	No						Blank	SEGRO wish to reiterate representations made to the Regulation 18 version of the Local Plan (under point 1(a)) [see Appended – Regulation 18 Draft Local Plan SEGRO response] . SEGRO recommend that the Vision more clearly outlines LBN’s approach to protecting and promoting new industrial uses in the wider context of economic growth for the borough and supporting functions for new residential development. The economic objectives should specifically refer to the protection and growth of industrial uses.		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council’s response has not changed.
Reg19-E-170	Berkeley Homes (South East London) Limited	Savills	Reg19-E-170/011	Vision and objectives							Blank	Blank						Blank	[3. MAIN REPRESENTATION] Vision and Objectives The Berkeley Homes supports the vision and objectives that is outlined within the Regulation 19 draft of the Local Plan Refresh and agrees that the vision for the transformation of Newham should be based on building a fairer, healthier and happier borough where creativity, diversity, an inclusive economy and community spirit can flourish and where residents feel proud of where they live.		Comment noted.

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Reg19-E-170	Berkeley Homes (South East London) Limited	Savills	Reg19-E-170/012	Vision and objectives							Blank	Blank						Blank	<p>[3. MAIN REPRESENTATION]</p> <p>We welcome reference to TwelveTrees Park and agree that this site aligns with the vision for LBN. Notwithstanding this, as currently drafted, the wording suggests more of a focus on business growth at TwelveTrees Park:</p> <p>“Developments across our neighbourhoods will create new green and well-designed genuinely affordable homes. New spaces where businesses can grow, including in the Beckton Riverside, Twelvetrees Park and Former Bromley-By-Bow Gasworks and Thameside West site allocations will create high quality and wellpaying local jobs – ensuring wealth created in our community stays in our community.”</p> <p>TwelveTrees Park, as amended, seeks to deliver circa 4,700 homes which will make a significant contribution to housing delivery within the borough. Whilst TwelveTrees Park will deliver a range of non-residential uses and employment opportunities, from a policy perspective, the site is not designated as an area for new employment floorspace where most of the employment floorspace will come forward.</p>	<p>We therefore suggest the following amends to ensure the site is reflected correctly:</p> <p>“Developments across our neighbourhoods will create new green and well-designed genuinely affordable homes. New spaces where businesses can grow, including in the Beckton Riverside, Twelvetrees Park and Former Bromley-By-Bow Gasworks and Thameside West site allocations will create high quality and wellpaying local jobs – ensuring wealth created in our community stays in our community.”</p>	<p>The change you have suggested has not been made. We did not consider this change to be necessary as this site is required to provide employment uses, given the history of the site allocation and it supports us to meet our objectively assessed need for employment floorspace. The Council is satisfied that the plan is sound without the proposed changes.</p>
Reg19-E-170	Berkeley Homes (South East London) Limited	Savills	Reg19-E-170/013	Vision and objectives							Blank	Blank						Blank	<p>The Local Plan Refresh outlines seven key objectives, many of which align with the Berkeley Group's own objectives for their development sites. In particular, the Berkeley Group welcomes the inclusion of the objective to create an inclusive economy (objective 2); create people-friendly neighbourhoods with green and clean streets (objective 3); safer Newham where no-one feels at risk of harm (objective 4); delivering homes for residents (objective 5) and supporting young people to have the best start in life and reach their potential (objective 6).</p>		<p>Comment noted.</p>
Reg19-E-176	Port of London Authority	Capita	Reg19-E-176/003	Vision and objectives							Blank	Blank						Blank	<p>Safeguarded Wharves</p> <p>It is recommended that the Key Diagram on page 21 is updated to specifically include the boroughs safeguarded wharves at Thames Refinery, Peruvian and Royal Primrose wharves to clearly identify the location of these important assets. It is also essential that the Local Plan specifically sets out that these are safeguarded via 2021 Secretary of State Ministerial Direction and supported by policy SI15 (Water Transport) of the Mayors London Plan (2021). Reference to the safeguarding directions isn't made until the supporting text, justification of T1:Strategic Transport (Page 321). Within the Local Plan it is recommended that this wording is included to support the Key Diagram [and included in policy J1 (Employment and Growth)] to highlight their safeguarded status.</p>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the Plan as currently drafted does effectively identify and safeguard the Safeguarded Wharves in line with national policy and London Plan requirements. The safeguarded wharves are included on our policies map, which provides a more detailed representation of our policy requirements and designations. They are also within identified employment areas on the key diagram, which is consistent with the level of detail provided on this diagram, which is primarily designed to illustrate our spatial ambitions, rather than land use designations. Reference is already made to the safeguarded wharves in J1, with reference made to priority employment uses for these wharves. The Council is satisfied that the plan is sound without the proposed changes.</p>

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Reg19-E-194	London Borough of Tower Hamlets		Reg19-E-194/001	Vision and objectives															Thank you for providing LB Tower Hamlets with the opportunity to submit a representation to your Draft Submission Local Plan consultation (Regulation 19 Plan). Overall, we support the principles and objectives of the Regulation 19 Plan and recognise that our two boroughs share many of the same challenges and opportunities.		Comment noted.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/009	Vision and objectives															2 Vision and objectives 2.1 St William wholeheartedly supports the vision and objectives that is outlined within the Regulation 19 draft of the Local Plan Refresh and agrees that the vision for the transformation of Newham should be based on building a fairer, healthier and happier borough where creativity, diversity, an inclusive economy and community spirit can flourish and where residents feel proud of where they live.		Comment noted.
Reg19-E-197	NHS HUDU		Reg19-E-197/002	Vision and objectives							Blank	No						Blank	We do consider that further changes are required to ensure the effective delivery of the local plan and the vision and objectives. The first paragraph of the vision includes “Our vision is for this transformation to build a fairer, healthier and happier borough”. We consider that the amendments sought within this representation will contribute to the Plan being found sound.		Comment noted.
Reg19-E-200	London City Airport		Reg19-E-200/031	Vision and objectives															Map shows SINC designation over part of the operational airport site. As with the key diagram, the policies map show SINC designation over part of the operational airport. This seems to be a legacy of the airport operational boundary before the new airside infrastructure was built. Key areas are highlighted at Annex 2.	Amendment of the Policies Map to remove any SINC designation from the LCY site, reflecting the fact that this is airport operational land.	The error on the Key Diagram and Policies Map is noted. The Council proposes to support your suggested mapping change to the Key Diagram and the Policies Map, which will be presented to the Inspector for their consideration. This change will also be reflected in the Green and Water Infrastructure Strategy 2025.
Reg19-E-226	NHS North East London		Reg19-E-226/002	Vision and objectives							Blank	Blank						Blank	General Comments As per our previous representations, NHS NEL are broadly supportive of the vision and objectives of the Local Plan.		Comment noted.

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Reg19-E-233	RAD CHP Ltd	CBRE	Reg19-E-233/003	Vision and objectives							Blank	No						Blank	<p>Vision and Objectives</p> <p>It is acknowledged within the Regulation 19 Local Plan Vision Statement that change will be “radical” in certain parts of Newham, specifically Royal Docks, which, once an isolated industrial site, will become a connected and lively location. The strategic site is identified specifically as a “transform” area where significant growth is directed, which is strongly supported.</p> <p>RAD CHP Ltd. are of the view (based on their experience in seeking occupiers for the largely vacant existing buildings at RAD) that flexibility in land use is essential, with a non-restrictive approach to enabling the best alternative uses to achieve occupancy and activity at the Royal Docks.</p> <p>The draft Local Plan emphasises the importance of young people to Newham’s future, stating “young people in particular will be welcomed and planned for, ensuring they retain an enduring stake in their future and the borough’s”. RAD CHP Ltd. fully support this statement, and this part of the Plan’s vision fully reflects their own vision to create quality accommodation and teaching space for young people to thrive.</p> <p>The proposals at RAD respond to Objective 5, delivering homes to meet the diverse needs of the population; and Objective 6, supporting young people to have the best start in life and reach their potential.</p>		Comment noted.
Reg19-E-236	Friends of Queen's Market		Reg19-E-236/007	Vision and objectives															[1. Queen’s Market conforms with key policies and aims, as follows:] B) The Plan’s Objectives 1 and 2 2024 - A healthier Newham and ageing well, An inclusive economy to support people in these hard times - are fully met by the role played by Queen’s Market.		Comment noted.