

Transport Comments

Representation Reference	Represntor	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-013	Transport for London		Reg19-E-013/015	Transport	T1 Strategic transport			T1.1											Although we welcome the change to wording in part 1.b.iii and T1.1 – Buses, we recommend that the word ‘depots’ is replaced by ‘garages’ as set out in our Regulation 18 representation because this is the term more commonly used by TfL.		<p>Support noted.</p> <p>The Council notes the proposed modification to replace ‘depots’ with ‘garages’. This is not considered necessary for soundness. However the Council supports the ‘garages’ wording to clarify this, while noting that ‘transport depot’ wording is used throughout the Plan.</p> <p>The Council recognises the importance of ensuring the Plan is factually accurate and has therefore made the following wording change which is included in the modification table.</p> <p>i. Radar stations and sightline ii. Rail (including National Rail, Elizabeth line, Tube, DLR) lines, stations and depots iii. Buses – priority measures, stands (including drivers’ facilities), stations and depots/garages iv. Protected mooring points, public river access points and piers v. Bridges and tunnels vi. Safeguarded wharves and their access requirements vii. Rail heads and their access requirements viii. London City Airport (including the Public Safety Zone and Aerodrome Safeguarding requirements) ix. London Cable Car</p>
Reg19-E-013	Transport for London		Reg19-E-013/016	Transport	T1 Strategic transport			T1.1											[It would be helpful if section T1.1 could also refer to projects and interventions that support delivery of TfL’s Bus Action Plan] We note that no change has been made in response to this point.		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council’s response has not changed.
Reg19-E-013	Transport for London		Reg19-E-013/017	Transport	T1 Strategic transport			T1.1											[We suggest that the word ‘negatively’ is inserted at the end of the third sentence in T1.1. Alternative wording could be ‘should demonstrate that negative impacts on the strategic transport infrastructure are minimised.’] We welcome revised wording in the second sentence in T1.1 to address this point.		Support noted.
Reg19-E-013	Transport for London		Reg19-E-013/018	Transport	T1 Strategic transport			T1.2a											We welcome the addition of a reference to active travel in part 2.a		Support noted.
Reg19-E-013	Transport for London		Reg19-E-013/019	Transport	T1 Strategic transport														[We welcome the reference to planning obligations being used to deliver strategic transport improvements, although this may be better included as part of the core policy] We note that no change has been made to address this point		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as we consider that policy T1 part 1c and the planning obligations text which supports policy T1, read alongside BFN4 are considered sufficient hooks for the obligation.</p> <p>This is the approach taken to all obligations in the Plan and is considered sufficiently deliverable. The Council is satisfied that the plan remains sound without this change.</p>

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Reg19-E-013	Transport for London		Reg19-E-013/020	Transport	T1 Strategic transport														[Reference to step-free access at existing/new infrastructure would be welcomed, although this will need to be funded through planning obligations or other funding sources because TfL is not able to commit funding at the current time.] We note that no change has been made to address this point		Comment noted. The Council hasn't specified any sources of funding for transport projects, apart from where a scheme is necessary for the Plan.
Reg19-E-013	Transport for London		Reg19-E-013/021	Transport	T1 Strategic transport														[We welcome the support expressed in paragraphs 3.252–3.254 for a potential DLR extension to Beckton Riverside and Thamesmead, and future improvements to Stratford station and the intention to protect land and access to ensure delivery of the projects. Mention could also be made of other potential new/ improved stations linked to development proposals. Support for these projects could be made stronger by referencing them in policy T1. The justification text in 3.252 outlines some of the benefits associated with these projects but it could also refer to unlocking and supporting growth. The justification text could also outline the role in which strategic transport provision enables better planning for wider and more local transport such as good interchanges with other public transport (including buses and cycling). This could also refer to TfL's Interchange Best Practice Guidelines.] We note that no changes have been made to the policy to address these points.		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the justification text of Policy T1. The Council's response has not changed.
Reg19-E-013	Transport for London		Reg19-E-013/022	Transport	T1 Strategic transport					T1.1									[The reference to safeguarded land, as well as its potential release where appropriate, is welcomed. This should be consistent with London Plan Policy T3 and London Plan Guidance (LPG) on Sustainable Transport, Walking and Cycling. It would be helpful in the Implementation section to refer to the LPG as it provides guidance on protecting transport infrastructure.] We welcome the addition of a reference to the LPG in T1.1 –Implementation.		Support noted.
Reg19-E-013	Transport for London		Reg19-E-013/023	Transport	T1 Strategic transport														[Rather than referring to the London-wide target, the Monitoring section should set a target of 83 per cent mode share for sustainable transport by 2041, consistent with the agreed LIPs target for Newham.] We welcome amended references to the 83 per cent target in the transport introduction and the monitoring section. However it should be noted that this local target for Newham is not set in the Mayor of London's Transport Strategy but has been agreed through the borough's Local Implementation Plan.		Support noted. The Council notes the proposed modification to clarify the 83 per cent mode share target, as agreed through the borough's Local Implementation Plan. The Council recognises the importance of ensuring the Plan is factually accurate and has therefore made the following wording change which is included in the modification table. Target at least 83 per cent of all trips to be made by foot, cycle or public transport. Monitor for progress towards the agreed target set in the Local Implementation Plan, following the Mayor's Transport Strategy towards the Mayor's Transport Strategy target.

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Reg19-E-020	National Highways		Reg19-E-020/002	Transport	T1 Strategic transport						Blank	Blank						Blank	<p>For the purposes of the emerging Newham Local Plan, we would be concerned with development patterns that have the potential to impact on the operation of the M11 and A13, although subject to the scale of impact, this may include other SRN positioned further afield. As a statutory consultee to the Local Plan consultation, we are interested in the potential traffic impacts of any development site proposals and/or policies coming forward which may impact on the operation of our network and the need to ensure that any impacts are fully understood at the plan-making stage.</p> <p>In terms of distance, Newham is located remotely from the strategic road network (SRN) under the stewardship of National Highways, being 3-4km at its boundary from the start of the M11 and approximately 12km from its boundary along the A13 to the London boundary. The Borough is directly connected to both roads directly by the A406 North Circular and A13 respectively.</p> <p>The Local Plan proposals include provision for between 46,000 and 52,000 homes in the borough. In terms of employment this also includes a requirement for 335,000 sqm of industrial floorspace, a minimum requirement for 90,000 sqm of office floorspace including new employment space for 10,000 new jobs through the Plan.</p>		Comment noted. This comment has been subject to further discussion with National Highways. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report.

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Reg19-E-020	National Highways		Reg19-E-020/005	Transport	T1 Strategic transport						Blank	Yes					Blank	[Compliance with Circular 01/2022 in Relation to Sustainable Development Paragraphs 11 to 17 of DfT Circular 01/22, consistent with the NPPF, cover national policy in relation to requirements for sustainable development and impacts on the strategic road network. A summary of the requirements is outlined below. – The Circular states that new development should facilitate a reduction in the need to travel by private car and be focused on locations that are or can be made sustainable (para 12). – There is an expectation that strategic policy-making authorities and community groups responsible for preparing local and neighbourhood plans should only promote development at locations that are or can be made sustainable and where opportunities to maximise walking, wheeling, cycling, public transport and shared travel have been identified (para 13). – National policy seeks to make the most efficient use of capacity within the overall transport network and supports other government policies, strategies and guidance that aim to reduce the negative environmental impacts of development (para 14). – The policy marks a move away from transport planning based on predicting future demand to provide capacity (‘predict and provide’) to planning that sets an outcome communities want to achieve and provides the transport solutions to deliver those outcomes (vision-led approaches including ‘vision and validate,’ ‘decide and provide’ or ‘monitor and manage’). National Highways will support local authorities in achieving this aim through its engagement with their plan-making and decision-taking stages, while recognising the varying challenges that will be presented by certain sites based on their land use, scale and/or location (para 15).] Newham Local Plan Policies T1 to T5 are related to transport and how transport will be used to help deliver the Plan growth to 2041. Policy T1 deals with strategic transport and allows development that will minimise impacts on existing transport networks. This includes all modes of transport. Developments in the Local Plan will also need to contribute to strategic transport infrastructure where relevant. New transport schemes must unlock growth and minimise social, economic and environmental impacts.		Comment noted.
Reg19-E-020	National Highways		Reg19-E-020/008	Transport	T1 Strategic transport						Blank	Yes					Blank	[Compliance with Circular 01/2022 in Relation to Sustainable Development Paragraphs 11 to 17 of DfT Circular 01/22, consistent with the NPPF, cover national policy in relation to requirements for sustainable development and impacts on the strategic road network. A summary of the requirements is outlined below. – The Circular states that new development should facilitate a reduction in the need to travel by private car and be		Comment noted.

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																			<p>focused on locations that are or can be made sustainable (para 12).</p> <p>– There is an expectation that strategic policy-making authorities and community groups responsible for preparing local and neighbourhood plans should only promote development at locations that are or can be made sustainable and where opportunities to maximise walking, wheeling, cycling, public transport and shared travel have been identified (para 13).</p> <p>– National policy seeks to make the most efficient use of capacity within the overall transport network and supports other government policies, strategies and guidance that aim to reduce the negative environmental impacts of development (para 14).</p> <p>– The policy marks a move away from transport planning based on predicting future demand to provide capacity (‘predict and provide’) to planning that sets an outcome communities want to achieve and provides the transport solutions to deliver those outcomes (vision-led approaches including ‘vision and validate,’ ‘decide and provide’ or ‘monitor and manage’). National Highways will support local authorities in achieving this aim through its engagement with their plan-making and decision-taking stages, while recognising the varying challenges that will be presented by certain sites based on their land use, scale and/or location (para 15).]</p> <p>The Newham Sustainable Transport Strategy outlines a range of measures in detail that will be employed to deliver the above policy commitments. The strategy includes commitments to implement measures designed to increase the role of sustainable travel and reduce/discourage the role of private vehicle use and includes a set of targets for monitoring.</p> <p>The strategy identifies a list of projects and themes to be implemented based upon the above strategic actions and measures. Many of the larger schemes identified have been included within the Infrastructure Delivery Plan although not all schemes have been costed or have indicative costs at the present time.</p>		

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Reg19-E-020	National Highways		Reg19-E-020/009	Transport	T1 Strategic transport						Blank	Yes					Blank	<p>[Compliance with Circular 01/2022 in Relation to Sustainable Development Paragraphs 11 to 17 of DfT Circular 01/22, consistent with the NPPF, cover national policy in relation to requirements for sustainable development and impacts on the strategic road network. A summary of the requirements is outlined below.</p> <p>– The Circular states that new development should facilitate a reduction in the need to travel by private car and be focused on locations that are or can be made sustainable (para 12).</p> <p>– There is an expectation that strategic policy-making authorities and community groups responsible for preparing local and neighbourhood plans should only promote development at locations that are or can be made sustainable and where opportunities to maximise walking, wheeling, cycling, public transport and shared travel have been identified (para 13).</p> <p>– National policy seeks to make the most efficient use of capacity within the overall transport network and supports other government policies, strategies and guidance that aim to reduce the negative environmental impacts of development (para 14).</p> <p>– The policy marks a move away from transport planning based on predicting future demand to provide capacity (‘predict and provide’) to planning that sets an outcome communities want to achieve and provides the transport solutions to deliver those outcomes (vision-led approaches including ‘vision and validate,’ ‘decide and provide’ or ‘monitor and manage’). National Highways will support local authorities in achieving this aim through its engagement with their plan-making and decision-taking stages, while recognising the varying challenges that will be presented by certain sites based on their land use, scale and/or location (para 15).]</p> <p>The Newham Sustainable Transport Strategy outlines a range of measures in detail that will be employed to deliver the above policy commitments. The strategy includes commitments to implement measures designed to increase the role of sustainable travel and reduce/discourage the role of private vehicle use and includes a set of targets for monitoring. The strategy identifies a list of projects and themes to be implemented based upon the above strategic actions and measures. Many of the larger schemes identified have been included within the Infrastructure Delivery Plan although not all schemes have been costed or have indicative costs at the present time.</p>		Comment noted.
Reg19-E-020	National Highways		Reg19-E-020/010	Transport	T1 Strategic transport						Blank	Yes					Blank	<p>[Compliance with Circular 01/2022 in Relation to Sustainable Development Paragraphs 11 to 17 of DfT Circular 01/22, consistent with the NPPF, cover national policy in relation to requirements for sustainable development and impacts on the strategic road network. A summary of the requirements is outlined below.</p> <p>– The Circular states that new development should facilitate a reduction</p>		Comment noted.

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																			<p>in the need to travel by private car and be focused on locations that are or can be made sustainable (para 12).</p> <p>– There is an expectation that strategic policy-making authorities and community groups responsible for preparing local and neighbourhood plans should only promote development at locations that are or can be made sustainable and where opportunities to maximise walking, wheeling, cycling, public transport and shared travel have been identified (para 13).</p> <p>– National policy seeks to make the most efficient use of capacity within the overall transport network and supports other government policies, strategies and guidance that aim to reduce the negative environmental impacts of development (para 14).</p> <p>– The policy marks a move away from transport planning based on predicting future demand to provide capacity ('predict and provide') to planning that sets an outcome communities want to achieve and provides the transport solutions to deliver those outcomes (vision-led approaches including 'vision and validate,' 'decide and provide' or 'monitor and manage'). National Highways will support local authorities in achieving this aim through its engagement with their plan-making and decision-taking stages, while recognising the varying challenges that will be presented by certain sites based on their land use, scale and/or location (para 15).]</p> <p>Additionally, although the strategy mentions vehicle trips travelling beyond the London boundary (Paragraph 2.7.10 and mentioned above), there is no indication of the scale of trips nor of what measures could be implemented to reduce these trips.</p>		
Reg19-E-020	National Highways		Reg19-E-020/011	Transport	T1 Strategic transport						Blank	Yes						Blank	<p>Conclusion</p> <p>Newham’s Local Plan largely accords with paragraphs 12 to 15 of Circular 01/2022, thereby complying with national policy on sustainable transport measures and consistent with National Highways commitment to Net Zero on the strategic road network by 2050 (Paragraph 11).</p>	<p>There is a question mark over longer distance commuting and further information is required concerning peak hour vehicle trips to and from a) the A13 east of the Borough that is entering and leaving London and b) the M11 to the north. This will allow a greater understanding of whether the strategic road network managed by National Highways (as opposed to the TfL strategic network) can accommodate the additional traffic in its present form.</p>	<p>Comment noted. This comment has been subject to further discussion with National Highways. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report.</p>

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Reg19-E-026	London Borough of Barking and Dagenham	BeFirst	Reg19-E-026/003	Transport	T1 Strategic transport														<u>Transport</u> We would also like to note the following points on transport: Local Plan Part 1: <ul style="list-style-type: none">• Policy T1 should include reference to Cross Borough/Agency working to improve key regional transport links which will be under pressure from the combined area growth including, the A13, West Ham Station (seeking a commitment from Network Rail), making better use of the river and also working to provide innovative bus and other rapid demand transport services.		Comment noted. This comment has been subject to further discussion with London Borough of Barking and Dagenham and a satisfactory resolution has been found. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report. In light of these comments, the Council recognises the importance of ensuring the Plan is effective and therefore proposes the following modification:
Reg19-E-081	Metropolitan Police Service - Designing Out Crime		Reg19-E-081/006	Transport	T1 Strategic transport						Blank	Blank						Blank	4) We would recommend any Policies that propose changes/improvements to the below areas also reference early engagement with the CTSAs: [- Crowded Places] - Transport Infrastructure [- Class A Licenses Premises - Utilities - Storage of Hazardous Materials - Iconic Buildings and; - Tall Buildings]	[An example would be Policy HS2: Managing new and existing town and local centres (pages 124-125) where this could be referenced in the Policy itself Section 9 (page 125) or within the Implementation Section HS2.9 (page 134).]	A change to this policy approach has not been made. We did not consider this change to be necessary as the proposed modification to implementation section for policy D1.3 sets out the need to engage with the Counter Terrorism Security Advisors where this has been identified as relevant. The Council considers this is the most appropriate way to address these matters in all circumstances that involve operational development. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/069	Transport	T1 Strategic transport														Development will be required to protect the transport network which TSP supports. There is also support for proposals for new strategic transport schemes which unlock growth and minimise social, economic and environmental impacts.		
Reg19-E-225	London Borough of Greenwich		Reg19-E-225/006	Transport	T1 Strategic transport						Blank	Blank						Blank	Page 24’s key diagram for the London Borough of Newham identifies transport and connectivity improvements which would enhance and connect the Royal Docks and Beckton Riverside Opportunity Area in Newham and Thamesmead in Royal Greenwich. These improvements relate to the potential DLR extension and additional stations. Page 587 of Newham’s consultation documents discusses Newham’s Gallions Reach neighbourhood, located in the southeast of the Borough within the Royal Docks and Beckton Riverside Opportunity Area. Paragraph 4.82 notes that the neighbourhood has very limited access to public transport, with the Council and other partners including Royal Greenwich proposing to extend the DLR through the neighbourhood and deliver a new DLR station at Beckton Riverside. The paragraph furthers that the DLR would continue over the river to another new DLR station at Thamesmead Central in Royal Greenwich.		Comment noted.

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Reg19-E-225	London Borough of Greenwich		Reg19-E-225/007	Transport	T1 Strategic transport						Blank	Blank						Blank	<p>1.13 [Royal Greenwich supports these references to the DLR extension within the consultation document and the Duty to Co-operate Document. Royal Greenwich is supportive of the delivery of the DLR extension to Thamesmead and the development potential it is expected to unlock. As identified in the Thamesmead and Abbey Wood Opportunity Area Planning Framework 2020, the DLR extension to Thamesmead is fundamental to enhancing the Thamesmead and Abbey Wood area. The DLR extension would:]</p> <ul style="list-style-type: none">• considerably enhance access and transport connections to and from the area, as well as increased connections to other parts of the borough and London, such as Isle of Dogs and Stratford;• significantly enhance development capacity in the area, where it would enable 15,500 new and affordable homes and 8,000 local jobs in conjunction with new complementary bus transit connections;• unlock the Thamesmead Waterfront site;• enable a wholesale revitalisation of Thamesmead Town Centre;• open opportunities for access and improvements to Thames riverfront;• increase activity, generating footfall and demand to support local businesses and contribute to the liveliness and safety of the area; and• increase access to jobs, education and other opportunities across London.		Comment noted.

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Reg19-E-225	London Borough of Greenwich		Reg19-E-225/008	Transport	T1 Strategic transport						Blank	Blank						Blank	<p>1.14 The area’s green setting and proximity to central London is an opportunity for well-designed, accessible homes and family housing, which the DLR extension would enable. A new DLR interchange and bus transit, complemented by improved walking and cycling connections will allow the Thamesmead Town Centre and Waterfront area to better serve the social and convenience needs of its existing and emerging community.</p> <p>1.15 The DLR extension would considerably improve public transport access for development sites around the Thamesmead Town Centre. It would also enable higher development density around the new DLR station, supporting the viability of a new town centre and new housing. The DLR extension is key to enabling a reinvigorated mixed-used district centre with family-friendly leisure and cultural uses and an attractive evening uses along the waterfront promenade.</p> <p>1.16 Royal Greenwich looks forward to continuing to work with London Borough of Newham and partners to secure the DLR extension to Beckton Riverside and to Thamesmead.</p>		Support noted.
Reg19-C-001	Sehar Khan		Reg19-C-001/001	Transport	T2 Local transport						Yes	No						No	<p>Front gardens should be allowed to be used as driveways and Newham should scrap its blanket ban on not installing drop kerbs</p> <p>20mph blanket policy should be abolished</p>		Comment noted. LB Newham does not support new dropped kerbs, as they remove front gardens (worsening biodiversity and increasing rainwater runoff), cause accessibility issues for pedestrians and reduce the quantity of available on-street parking. LB Newham has rolled out a 20mph speed limit, along with other London boroughs as part of efforts to reduce road danger on our streets. The Council considers the policy to be justified and in conformity with the London Plan.

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Reg19-E-007	David Gilles		Reg19-E-007/034	Transport	T2 Local transport						Blank	Blank						Blank	P347 T2: Add at the end of para 1 words to the effect that changes should take place after consultation with residents and their properly informed agreement via a ballot of affected residents.		This wording change has not been made. The implementation text of Policy T2.1 sets out that applicants should consult on new schemes as appropriate. With regards to consultation of LTNs, consideration of an LTN in the borough involves extensive data collection and consideration of feedback from local residents and businesses. The Council also consults with statutory stakeholders (London Ambulance Service, Met Police, London Fire Brigade and others). If the Council decides to proceed with an experimental scheme, we install temporary modal filters. During this stage, we gather traffic and air quality data to measure the impact of the low traffic neighbourhood. We also collect feedback to help us decide whether or not to make the scheme permanent. More information about Low Traffic Neighbourhoods in Newham is available on the Newham LTN web page: https://www.newham.gov.uk/transportstreets/low-traffic-neighbourhood The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-007	David Gilles		Reg19-E-007/035	Transport	T2 Local transport						Blank	Blank						Blank	P351 T2 1a: change “discouraging vehicle use” both here and elsewhere to “encouraging the reduced use of”. Add “and car clubs”. A similar sentiment should be added to T2 to that suggested to P347.		A change to this policy approach has not been made. Newham has a target of 83 per cent of all trips to be made on foot, by cycle or using public transport by 2041, set in the Mayor of London’s Transport Strategy. The Local Plan therefore discourages car use, and encourages the use of active travel and public transport. The justification text of Policy T2 supports and encourages. car clubs.
Reg19-E-007	David Gilles		Reg19-E-007/036	Transport	T2 Local transport						Blank	Blank						Blank	P352 Justification of T2: There should be some additional text about improving North-South permeability in the Borough. All the “major” roads in Newham are used for east-west, often commuter, travel (except the A406 which is largely through traffic) and vice versa and often/mainly by people who are not Newham residents. This traffic is a major determinant of the poor quality of much urban space in Newham and is not adequately addressed in the Plan. In para 2 the need for effective consultation and resident consent should be highlighted.		Comment noted. The Sustainable Transport Strategy sets out interventions that will reduce severance and improve barriers to movement. The implementation text of Policy T2.1 sets out that applicants should consult on new schemes as appropriate. With regards to consultation of LTNs, consideration of an LTN in the borough involves extensive data collection and consideration of feedback from local residents and businesses. The Council also consults with statutory stakeholders (London Ambulance Service, Met Police, London Fire Brigade and others). If the Council decides to proceed with an experimental scheme, we install temporary modal filters. During this stage, we gather traffic and air quality data to measure the impact of the low traffic neighbourhood. We also collect feedback to help us decide whether or not to make the scheme permanent. More information about Low Traffic Neighbourhoods in Newham is available on the Newham LTN web page: https://www.newham.gov.uk/transportstreets/low-traffic-neighbourhood

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Reg19-E-013	Transport for London		Reg19-E-013/024	Transport	T2 Local transport			T2.1											[In the second paragraph of T2.1 we would like to see additional wording inserted as follows: 'Development should enhance the attractiveness of public transport services. Measures should seek to enhance the reliability, accessibility and ease of interchange of public transport services.'] We welcome the inclusion of additional wording in T2.1 to address this point.		Support noted.
Reg19-E-013	Transport for London		Reg19-E-013/025	Transport	T2 Local transport														[Rather than referring to the London-wide target, the Monitoring section should set a target of 83 per cent mode share for sustainable transport by 2041, consistent with the agreed LIPs target for Newham] We welcome the amended references to the 83 per cent target throughout the document.		Support noted.

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Reg19-E-020	National Highways		Reg19-E-020/006	Transport	T2 Local transport						Blank	Yes						Blank	<p>[Compliance with Circular 01/2022 in Relation to Sustainable Development Paragraphs 11 to 17 of DfT Circular 01/22, consistent with the NPPF, cover national policy in relation to requirements for sustainable development and impacts on the strategic road network. A summary of the requirements is outlined below.</p> <p>– The Circular states that new development should facilitate a reduction in the need to travel by private car and be focused on locations that are or can be made sustainable (para 12).</p> <p>– There is an expectation that strategic policy-making authorities and community groups responsible for preparing local and neighbourhood plans should only promote development at locations that are or can be made sustainable and where opportunities to maximise walking, wheeling, cycling, public transport and shared travel have been identified (para 13).</p> <p>– National policy seeks to make the most efficient use of capacity within the overall transport network and supports other government policies, strategies and guidance that aim to reduce the negative environmental impacts of development (para 14).</p> <p>– The policy marks a move away from transport planning based on predicting future demand to provide capacity ('predict and provide') to planning that sets an outcome communities want to achieve and provides the transport solutions to deliver those outcomes (vision-led approaches including 'vision and validate,' 'decide and provide' or 'monitor and manage'). National Highways will support local authorities in achieving this aim through its engagement with their plan-making and decision-taking stages, while recognising the varying challenges that will be presented by certain sites based on their land use, scale and/or location (para 15).]</p> <p>Policy T2 covers local transport including a local vision for sustainable and connected communities and new development. It includes commitments to the prioritisation of walking and cycling and discouraging vehicles from both design and management perspectives.</p>		Comment noted.

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Reg19-E-043	David Anderson		Reg19-E-043/001	Transport	T2 Local transport						T2.1	No	No						Yes	<p>Why I consider the Local Plan is not legally compliant or sound</p> <p>The access needs to services infrastructure does not appear to be properly assessed, The plan is therefore not sufficiently effective or in compliance.</p> <p>The Newham plan needs to include its own assessments of access to services as part of its approach. There are clearly issues with the connectivity of transport for people with impairments. The Report ‘ Accessibility of the transport network’, London assembly publication Friday 19th November 2016 states “ while all London buses now have ramps, only half of London’s 17,476 bus stops meet the criteria for full accessibility”. The Disability Discrimination Act 1995 conveys responsibilities to all providers of services. In principle the Newham Local Plan should enable the provision for the ability of movement of impaired residents to have full access to public transport, particularly in terms of avoiding ‘gaps’ between different providers responsibilities:</p> <p>The Disability Discrimination Act 1995: PART III Goods, facilities and services, Section 21, Duty of providers of services to make adjustments States:</p> <p>(2)Where a physical feature (for example, one arising from the design or construction of a building or the approach or access to premises) makes it impossible or unreasonably difficult for disabled persons to make use of such a service, it is the duty of the provider of that service to take such steps as it is reasonable, in all the circumstances of the case, for him to have to take in order to— (a)remove the feature; (b)alter it so that it no longer has that effect; (c) provide a reasonable means of avoiding the feature; or (d)provide a reasonable alternative method of making the service in question available to disabled persons.” I believe that Newham Council in fact upholds this aspiration from the statement on p 7 of the Equalities and the local Plan, Newham council, paragraph 4. The lack of commitment in the Local Plan appears to be an oversight. The Local plan should have a commitment to the inter-connection of services, such that the chain of responsibility for transport accessibility is not broken by the different responsible service providers.</p> <p>One clear example of this disconnected service provision is the key transport hub at East Ham station. The access to transport is not fully compliant. The bus stop outside 206 High Street North needs to be fully accessibly linked to the station. This would require an assessment and accessibility upgrade in the public highway across Sibley Grove by Newham Council.</p> <p>This may not be strictly a breach of law but certainly the intention should be to provide full access. If not a breach, then it is just unsound as any improvements may remain disconnected leaving barriers to</p>	<p>The access needs to services infrastructure does not appear to be properly assessed. Local Plan, policies T2: Local transport, T2.1, p 326 paragraph 4, should read: The Neighbourhoods policies (Local Plan Section 4) provide further detail on transport improvements and projects in neighbourhoods in Newham. Newham will demonstrate in Neighbourhood specific Design and Access Statements that a range of impairments and barriers to transport have been considered as well as the transport needs of carers , prioritising areas of the borough with TPAL ratings below 3 and transport interchanges. Development should enhance the reliability, accessibility, attractiveness and ease of interchange of public transport services.</p> <p>This will ensure that a range of impairments have been fully assessed for their transport implications and any changes to physical infrastructure included in the Local plan.</p>	<p>Comment noted. The Council considers that the borough is widely accessible for all residents, as set out in the Sustainable Transport Strategy. Only 4 stations in the borough are without step free access, TfL note that 95% of bus stops in London are accessible (2019 data) and the Sustainable Transport Strategy sets out further accessibility improvements to be made in future. The neighbourhood policies sets out walking, cycling and public transport improvements in the East Ham neighbourhood, including “requiring and supporting improved walking routes within and linking to the [East Ham] major centre and improved crossings”. Decisions regarding parking bays and parking restrictions are not a planning matter, and is the remit of the Newham parking and Highways teams. The Council is satisfied that the plan is sound without the proposed changes.</p>

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
																			<p>accessing public transport in place.</p> <p>In addition under the Care Act 2014 Part 1 section 6:</p> <p>(2)“ A local authority must co-operate, in the exercise of its functions under this Part, with such other persons as it considers appropriate who exercise functions, or are engaged in activities, in the authority’s area relating to adults with needs for care and support or relating to carers.”</p> <p>and</p> <p>(3)“The following are examples of persons with whom a local authority may consider it appropriate to co-operate for the purposes of subsection (2)—</p> <p>(a)a person who provides services to meet adults’ needs for care and support, services to meet carers’ needs for support or services, facilities or resources of the kind referred to in section 2(1);”</p> <p>Newham planning should have full regard to the wider transport issues raised in the Newham Plan for both disabled people and their carers. The policy does place obligations on ‘developers’ and ‘applicants’ to produce transports plans and assessments, the Local plan should produce neighbourhood level planning for existing community neighbourhoods. The plan is not clear on the approach of transport for those who have difficulty walking and cannot cycle or a range of other impairments due to health conditions and aging who may well be dependant on carers. The local plan currently includes the following provisions:</p> <ul style="list-style-type: none">• Disabled Car parking bays (which cannot be used by carers).• Local public transport may not be available (some areas of East Ham TPAL 0).• Parking is heavily restricted for non-residents within Parking Zones.• Taxi services may not be appropriate or affordable. <p>It would appear to be reasonable for the local plan to be explicit about what it plans to provide and a commitment to co-operate with Newham residents by consulting, understanding and making clear provision available.</p>		

Transport Comments	
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[illegible]

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																			1,2,3,4 & 5 , particularly GP services which is already affected. The issues would be substantially resolved If a service similar to the existing Bus 300 route (in the neighbourhood south of Barking Road and the Burges Estate were introduced.		
Reg19-E-081	Metropolitan Police Service - Designing Out Crime		Reg19-E-081/016	Transport	T2 Local transport			T2.2c			Blank	Blank						Blank	8) Where Car Clubs are mentioned in Policy T2 (page 351) section 2c, it is worth confirming that these will be within the public realm to avoid non-residents potentially having access into private car parking areas which can be a major source of Crime and ASB.		Comment noted, Policy T3.1 makes clear that car club bays should be publicly accessible.
Reg19-E-081	Metropolitan Police Service - Designing Out Crime		Reg19-E-081/035	Transport	T2 Local transport						Blank	Blank						Blank	[Appendix 1: Supporting Policies Specifically Relating to Crime Prevention Draft Submission Local Plan (Regulation 19 June 2024)] Policy T2: Local transport page 351 1. Development should support a network of well-connected neighbourhoods, improve air quality, maximise health benefits, improve accessibility, reduce carbon emissions and deliver sustainable growth. This will be achieved through: 2. Major development should provide or contribute towards: a. Wayfinding in the local area, including through contributions towards Legible London. Large scale development, as well as sites delivering their own streets or multiple blocks of housing should also deliver high quality wayfinding on site. c. Car clubs, providing an appropriate number of car club parking bays, taking into account the scale of development, existing local car club bays and local parking demand.		Comment noted.

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Reg19-E-081	Metropolitan Police Service - Designing Out Crime		Reg19-E-081/036	Transport	T2 Local transport						Blank	Blank						Blank	<p>[Appendix 1: Supporting Policies Specifically Relating to Crime Prevention Draft Submission Local Plan (Regulation 19 June 2024)] Implementation Policies pages 353-354</p> <p>T2.1 Developments should seek to reduce barriers to movement, benefiting pedestrians and cyclists in particular. Large buildings and development sites can also act as barriers, so masterplanning should consider optimal routes to, from and around sites. Developments should demonstrate that sites are accessible for all residents, with pavements free of trip hazards/obstructions. Immediate access to a site should also be considered, with the provision of dropped kerbs at junctions or removal of pavement parking.</p> <p>T2.2 The Council’s emerging Car Club Strategy and the Sustainable Transport Strategy outlines the preferred approach towards car clubs. Applicants should work in partnership with London Borough of Newham, Transport for London and car club providers to understand the proposed level of car club bays and level of contributions required. This should take into account the scale of development, existing local car club bays and local parking demand. Car club parking bays should be accessible to members of the public, not restricted to certain occupiers or residents of a development.</p>		Comment noted.
Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/070	Transport	T2 Local transport														<p>The policy wording is supported. However, as part of 2c, it states that major developments should provide an appropriate amount of car club parking bays. Further clarity on this point would be appreciated to understand what is an appropriate amount.</p> <p>In terms of the Legible London initiative, further information around how much funding would be required for developments is essential. Further information is required re how developments would integrate ‘new transportation technology’ which has been defined as drones, electric cars etc.</p>		Comment noted. The quantity of car club parking bays sought, the quantity of funding for Legible London wayfinding sought would depend on the scale of development. The Council is unaware exactly what transportation technologies will emerge in future.
Reg-19-D-EH-001	Sharon Fell		Reg-19-D-EH-001/008	Transport	T3 Transport behaviour change						Blank	No						Blank	<p>Losing part of car park. – Losing the car park (the only one left in the High St – already lost 2) how will shops receive deliveries as front is pedestrianised?</p>		Comment noted. Pedestrianised streets allow for deliveries and servicing while restricting general traffic from the street. This often takes places during particular times of day - such as early mornings and evenings.
Reg19-E-013	Transport for London		Reg19-E-013/026	Transport	T3 Transport behaviour change														<p>We welcome clarification relating to Blue Badge parking.</p>		Support noted.

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Reg19-E-013	Transport for London		Reg19-E-013/027	Transport	T3 Transport behaviour change														We welcome clarification that any car parking for commercial or industrial uses should be within the maximum standards set by the London Plan.		Support noted.
Reg19-E-013	Transport for London		Reg19-E-013/028	Transport	T3 Transport behaviour change			T3.1											We welcome clarification of the requirements for mobility scooter parking in part 1.c. and T3.1		Support noted.
Reg19-E-013	Transport for London		Reg19-E-013/029	Transport	T3 Transport behaviour change			T3.5											We welcome clarification of the requirements for charging E bikes and mobility scooters in part 5. This should be checked for consistency with the latest safety advice from London Fire Brigade.		Support noted. Implementation text of Policy T3.5 states that “Applicants should liaise with Building Control and the London Fire Brigade to understand the current recommendations and requirements.”
Reg19-E-013	Transport for London		Reg19-E-013/030	Transport	T3 Transport behaviour change			T3											We note that this approach has not changed but we understand that it is to cater for delivery and servicing vehicles.		Comment noted.
Reg19-E-013	Transport for London		Reg19-E-013/031	Transport	T3 Transport behaviour change			T3.1											We reiterate our Regulation 18 response that in T3.1 there should be a reference to the Blue Badge parking requirements in London Plan Policies T6.1 and T6.5.		The Council notes the proposed modification to reference the London Plan policies T6.1 and T6.5 in Policy T3.1. The Council recognises the importance of ensuring the Plan is clear and easy to use and has therefore made the following wording change which is included in the modification table. Developments should provide a quantity of blue badge spaces (in line with London Plan (2021) standards), proportionate to the scale and nature of the development and the quantity of existing blue badge spaces in the local area.
Reg19-E-013	Transport for London		Reg19-E-013/032	Transport	T3 Transport behaviour change			T3.3											We welcome the amended reference to a Parking Design and Management Plan in T3.3.		Support noted.
Reg19-E-013	Transport for London		Reg19-E-013/033	Transport	T3 Transport behaviour change			T3.7											We note that this is already covered by T3.7 although it would be helpful to clarify that the Transport Assessment should include a day and night time Active Travel Zone Assessment at least for applications referred to the Mayor of London.		This wording change is not supported. We did not consider this change to be necessary as T3 already requires Transport Assessment to follow Transport for London format. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-013	Transport for London		Reg19-E-013/034	Transport	T3 Transport behaviour change			T3.2											We strongly welcome the addition of part 2 which states that ‘Development that proposes a drive-through will not be supported. Development which results in the loss of existing car parking or excess road space would be supported.		Support noted.

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Reg19-E-020	National Highways		Reg19-E-020/007	Transport	T3 Transport behaviour change						Blank	Yes						Blank	<p>[Compliance with Circular 01/2022 in Relation to Sustainable Development Paragraphs 11 to 17 of DfT Circular 01/22, consistent with the NPPF, cover national policy in relation to requirements for sustainable development and impacts on the strategic road network. A summary of the requirements is outlined below.</p> <ul style="list-style-type: none">– The Circular states that new development should facilitate a reduction in the need to travel by private car and be focused on locations that are or can be made sustainable (para 12).– There is an expectation that strategic policy-making authorities and community groups responsible for preparing local and neighbourhood plans should only promote development at locations that are or can be made sustainable and where opportunities to maximise walking, wheeling, cycling, public transport and shared travel have been identified (para 13).– National policy seeks to make the most efficient use of capacity within the overall transport network and supports other government policies, strategies and guidance that aim to reduce the negative environmental impacts of development (para 14).– The policy marks a move away from transport planning based on predicting future demand to provide capacity ('predict and provide') to planning that sets an outcome communities want to achieve and provides the transport solutions to deliver those outcomes (vision-led approaches including 'vision and validate,' 'decide and provide' or 'monitor and manage'). National Highways will support local authorities in achieving this aim through its engagement with their plan-making and decision-taking stages, while recognising the varying challenges that will be presented by certain sites based on their land use, scale and/or location (para 15).]<p>Policy T3 states that with some exceptions all development will be car free except for limited provision. Residential car parking will not be supported except for blue badge holders and car parking for employment uses must be kept to the lowest justified provision. In place of car parking space, provision must be made for high sustainable travel storage, including safe and secure cycle provision.</p>		Comment noted.

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Reg19-E-024	Home Builders Federation		Reg19-E-024/036	Transport	T3 Transport behaviour change							No							<p>T3: Transport behaviour change</p> <p>Part 1 a resists car-parking in all residential schemes with the exception of parking for blue badge holders. This is unsound because it is unjustified and contrary to the London Plan.</p> <p>While we appreciate the general aim, the restriction is unusually prohibitive and may not reflect the availability of public transport options in some locations. The London Plan, at Policy T6: Car parking, set out the general policy for car parking on new developments. Part B states:</p> <p>Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite'). Car-free development has no general parking but should still provide disabled persons parking in line with Part E of this policy.</p> <p>There may be instances where new residential developments in the borough are not so well connected to public transport so rather than the policy definitively ruling against car-parking, it would be better if the policy allowed for circumstances where limited car-parking for residents would be allowed.</p> <p>Based on London Plan policy T6.1 and Table 10.3 – Maximum residential parking standards – developments in Inner London PTALs 0-3 are allowed some car-parking spaces.</p>		<p>Comment noted. The policy follows the approach laid out in the London Plan, which sets out that car free development as the starting point for all new development. This approach is strongly supported by the GLA. To achieve its modal share target, Newham needs a substantial shift in behaviour towards public transport and active travel - and therefore the policy discourages vehicle use.</p>
Reg19-E-026	London Borough of Barking and Dagenham	BeFirst	Reg19-E-026/004	Transport	T3 Transport behaviour change														<ul style="list-style-type: none">Policy T3 Transport behaviour change should include cross borough partnership to support active and sustainable connections for those travelling between LB Barking and Dagenham and LB Newham, including working together to support the provision of bike hire (Lime) and the Lower Roding Crossing which benefits both communities.		<p>Comment noted. This comment has been subject to further discussion with London Borough of Barking and Dagenham and a satisfactory resolution has been found. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report.</p> <p>In light of these comments, the Council recognises the importance of ensuring the Plan is clear and therefore proposes the following modification:</p>

Transport Comments

Reg19-E-034	Unite Group Plc	ROK Planning	Reg19-E-034/015	Transport	T3 Transport behaviour change			T3.4 & T3.5				Blank	Blank					Blank	<p>Policy T3 – Transport Behaviour Change Parts 4 and 5</p> <p>4. All new development should deliver high quality, sustainable transport storage (including cycle parking, in line with, or higher than, London Plan standards) and should meet the following requirements, as relevant:</p> <p>...</p> <p>d. Provision for larger ‘non-standard’ cycle parking (such as for cargo bikes) should comprise a minimum of five per cent of spaces, or one space where the total level of parking provision is below twenty spaces.</p> <p>5. Major developments should make provisions for safe and convenient charging of E-bikes and mobility scooters</p> <p>Unite make the following comments on Parts 4 and 5 of Policy T3:</p> <p>1. Firstly, neither the Policy nor supporting text provide any evidence to justify the requirement of such an onerous level of larger cycle parking provision.</p> <p>2. Secondly, Unite’s experience shows that the level of demand for the parking of larger bikes such as cargo bikes is low and does not equate to 5% of total cycle parking.</p> <p>3. The uptake of cycling parking in general is low across Unite’s schemes in London. The most recent survey, undertaken in December 2023, demonstrated that there is a less than 5% uptake of existing cycle parking spaces at Unite properties across London, equating to a maximum demand of one cycle space per 20 students. Therefore, the overprovision of standard parking spaces is already an issue in PBSA developments and results in the unnecessary loss of additional PBSA bedrooms and amenity space. Thus, the additional requirement for 5% of these spaces to be even larger will only exacerbate the space lost to cycle parking which could instead be used to cater for growing demand for student bedspaces and greater amenity space for occupiers.</p> <p>4. It is also considered that an increase in the provision of cycle parking for PBSA does not directly result in an increase in cycling patterns amongst students. Firstly, PBSA schemes are generally in close proximity of places of study or in areas of high public transport accessibility, allowing the majority of journeys to be undertaken on foot or via public transport. Secondly, those that are not accustomed to cycling, particularly cycling in London, often perceive this as dangerous. And thirdly, the influence and take up of Cycle hire schemes provide an affordable means of transport and preclude the need for private cycle ownership and storage, eliminating the need for students to invest in the safety, security and maintenance associated with private ownership of both standard and larger bikes.</p>	<p>On the basis of the above comments, Unite make the following recommendations to acknowledge the lack of uptake in PBSA developments:</p> <ul style="list-style-type: none">• Part 4 of the Policy is reworded to allow greater flexibility for PBSA developments with regards to the cycle parking standards set out in the London Plan, not encouraging provision greater than these standards which significantly overprovide in comparison with recorded uptake. This should be especially relevant where it can be demonstrated that a scheme lies in a highly accessible location.• Part 4d of Policy T3 is amended to either clarify that this is not applicable to PBSA schemes or remove the unreasonable percentage requirement and instead encourage suitable provision.• Part 5 of the Policy should also be amended to allow for greater flexibility where it can be demonstrated that the site is in a highly accessible location, or where cycle hire schemes or pool bikes are being provided in proximity of the site.	<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as we are following the cycling parking standards laid out in the London Plan (2021). The Council is satisfied that the plan remains sound without the proposed changes.</p>
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Reg19-E-081	Metropolitan Police Service - Designing Out Crime		Reg19-E-081/017	Transport	T3 Transport behaviour change			T3.4a			Blank	Blank						Blank	9) We are supportive of Policy T3: Transport Behaviour Change (page 356) section 4a that ensures “Storage should be safe, secure, well lit, clean and prominent” and allows for measures to comply with this to be “in line with, or higher than, London Plan standards”.		Support noted.
Reg19-E-081	Metropolitan Police Service - Designing Out Crime		Reg19-E-081/018	Transport	T3 Transport behaviour change						Blank	Blank						Blank	Following further technical advice, it is recommended that within sections 5 and 6 or as an addendum the following is noted in relation to Electric Vehicle Charging Points: “Where developments may require the charging and storage of Lithium-ion powered vehicles or devices, the developer or developer’s agent must be aware that it is their responsibility to inform the Responsible Person(s), Fire and Rescue Service and Building Control of these storage facilities and areas, to ensure that the necessary fire suppression measures for the charging and storage of lithium-ion products have been considered and specified.”		A change to this policy approach has not been made. We did not consider this change to be necessary as building standards regulate fire suppression measures. Policy T3.5 directs applicants to liaise with Building Control and the London Fire Brigade to understand current recommendations and requirements. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-081	Metropolitan Police Service - Designing Out Crime		Reg19-E-081/037	Transport	T3 Transport behaviour change			T3.4			Blank	Blank						Blank	[Appendix 1: Supporting Policies Specifically Relating to Crime Prevention Draft Submission Local Plan (Regulation 19 June 2024)] Policy T3 – Transport behaviour change page 356 4. All new development should deliver high quality, sustainable transport storage (including cycle parking, in line with, or higher than, London Plan standards) and should meet the following requirements, as relevant: a. Storage should be safe, secure, well lit, clean and prominent.		Comment noted.

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Reg19-E-081	Metropolitan Police Service - Designing Out Crime		Reg19-E-081/038	Transport	T3 Transport behaviour change							Blank	Blank					Blank	<p>[Appendix 1: Supporting Policies Specifically Relating to Crime Prevention Draft Submission Local Plan (Regulation 19 June 2024)]</p> <p>Implementation Policies pages 360-361</p> <p>T3.3 Or where including parking inside podium structures, in a basement or otherwise inside a building, it should:</p> <ul style="list-style-type: none">- Be capable of changing and evolving over time,- Ensure that car parking cannot block or hinder access to sustainable transport storage,- Ensure that access to/from parking is easy and clear,- In larger parking structures, consider use of supergraphics and other wayfinding signage elements,- Use high quality lighting and consider of blind spots,- Provide CCTV for security. <p>3.4 Cycle parking should meet London Cycle Design Standards. The Sustainable Transport Strategy outlines that a minimum of five per cent of cycle parking should be dedicated to larger non-standard cycle parking. This larger non-standard cycle parking should preferably be provided in the same location as standard cycle parking. It should accommodate a range of non-standard cycles, through provision of sufficient space to park and manoeuvre and step-free access.</p> <p>Where standard parking is provided in the form of Sheffield Stands, the end stands can be dedicated to non-standard cycles if there is sufficient space at either side. Other stand options could include ground anchors or lower and extended Sheffield Stands. All larger non-standard cycle parking should be clearly labelled to state that it is dedicated to larger non-standard cycles only.</p> <p>Applicants should demonstrate in a Design and Access Statement that they have considered the following to ensure delivery of high quality sustainable transport storage:</p> <ul style="list-style-type: none">- Who will use the storage – residents, shoppers, employees, children etc,- Security of the storage, and how it’s accessed,- Consideration of routes to and from the storage– to the street, interior of the building and other facilities,- Avoiding sharp corners that a larger non-standard bike would be unable to use,- Consideration of ease of use for all, including older people, children and disabled people,- High quality lighting and consideration of blind spots,- Clear, obvious signage,- In larger parking structures, consideration of supergraphics and other wayfinding signage elements,- Potential provision of ancillary equipment – such as a manual air pump, stand and basic tools,- Provision of CCTV for security,- Accessibility for all mobility options,- Where applicable, location and access to sufficient supporting facilities including lockers and showers, with this located close by.		Comment noted.
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Reg19-E-112	SEGRO	Gerald Eve	Reg19-E-112/026	Transport	T3 Transport behaviour change						Blank	No						Blank	SEGRO welcome the inclusion of the reference to the London Plan maximum standards as set out in policy reference 1(c).		Support noted.
Reg19-E-185	Hadley Property Group	Deloitte	Reg19-E-185/030	Transport	T3 Transport behaviour change			T3.5b			No	No						No	Transport Policy T3: Transport Behaviour Change Hadley reiterates that the provision of Electric Vehicle Charging Points should be in line with the London Plan rather than going beyond the requirements as set out in Part 5b which requires 100% of residential spaces rather than 20%. Part 5c requires major development with zero car parking on site to provide contributions to Electric Vehicle Charging Points elsewhere in the borough. While Hadley does not have an issue with the principle of major developments with zero onsite car parking providing contributions to Electric Vehicle Charging Points elsewhere in the borough, the location of such charging points should be agreed with the Applicant in the vicinity of the proposed development to ensure those benefit future residents.		A change to this policy approach has not been made. We did not consider this change to be appropriate as we wish to go beyond the London Plan to maximise the electrification of vehicles (noting the limited amount of parking delivered by this policy) - requiring a large rollout of electric vehicle charging points. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/076	Transport	T3 Transport behaviour change														11 Transport 11.1 St William agrees that high quality, sustainable transport is key to delivering many of Newham’s objectives and wishes to support LBN where they can in ensuring all of their development sites deliver and encourage methods of high quality, sustainable transport. 11.2 At a strategic level St William remains supportive of new strategic transport projects and agree that new strategic transport has the potential to unlock significant development opportunity that can deliver substantial economic, social and environmental benefits for the borough.		Support noted.

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Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/077	Transport	T3 Transport behaviour change							No							Policy T3 Transport behaviour change 11.3 St William supports the requirement or support for the delivery of Electric Vehicle Charging Points within a development (Part 6) albeit would note that where parking can only be provided in the basement of a development there is an ongoing issue with meeting relevant fire regulations and this should be taken account of when considering the requirements of this policy. 11.4 Part 6 (c) outlines a requirement for major developments with zero car parking on site to provide contributions towards EVCPs in other parts of the borough. Whilst St William supports the encouragement given to the provision of EVCPs, it is not considered necessary to provide this contribution where a development is meeting the primary transport objective of achieving car free development. This policy requirement is not considered to be justified and therefore does not meet the tests of soundness in the NPPF.	[Appendix 12: General Policies – Suggested amendments] 6. Electric Vehicle Charging Points will be supported where the following requirements must be met: e. Major developments with zero car parking on site must provide contributions towards Electric Vehicle Charging Points in other parts of the borough.	A change to the policy approach has not been made. We seek to increase the number of electric vehicle charging points given that developments need to receive deliveries and be serviced, and that residents will receive visitors who use cars. The electrification of vehicles (and the limited amount of parking delivered by this policy) will require a large rollout of electric vehicle charging points. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/071	Transport	T3 Transport behaviour change														Car free development and development that provides sustainable transport storage is supported. However, the Transport Assessment thresholds set out in Table 15 seem to be low for certain development, especially for residential, medical services and hotels. Their levels should be revisited.		Comment noted. The Council has maintained the Transport Assessment thresholds from the Newham Local Plan 2018, noting the change in some use classes since adoption.
Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/45	Transport	T3 Transport behaviour change			1											Transport Policy T3: Transport behaviour change Part 1 of the draft policy requires all new development to be car free. Ballymore strongly objects to this approach: in areas with low PTAL, a level of car parking for non-blue badge holders is required for those who use cars for their jobs (i.e. plumbers and local business owners), as well as those with families and should therefore be allowed. Ballymore have experienced at their Royal Wharf and Deanston Wharf developments where a number of families wanting to move into the development without car parking decided to not proceed without the availability of car parking. The car free policy is contradictory to maximising the family housing provision in the development. We support the delivery of car free development as a starting point in line with the London Plan, however, the current drafting is too restrictive and should allow for site specific challenges to be considered as part of this assessment		Comment noted. The policy follows the approach laid out in the London Plan, which sets out that car free development as the starting point for all new development. This approach is strongly supported by the GLA. To achieve its modal share target, Newham needs a substantial shift in behaviour towards public transport and active travel - and therefore the policy discourages vehicle use.

Transport Comments

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Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/46	Transport	T3 Transport behaviour change			6											Part 6 of the draft policy requires 100% provision for electric vehicle charging for residential from the outset,	this should be amended to align with London Plan standards (i.e. 20% active charging from the outset with passive provision for the remainder).	A change to this policy approach has not been made. We did not consider this change to be appropriate as we wish to go beyond the London Plan to maximise the electrification of vehicles (noting the limited amount of parking delivered by this policy) - requiring a large rollout of electric vehicle charging points. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-013	Transport for London		Reg19-E-013/035	Transport	T4 Servicing a development			T4.1				no							We reiterate our Regulation 18 response that the requirement for Construction Logistics Plans and Delivery and Servicing Plans should be made clearer using the standard terminology used in London Plan Policy T7 and providing a link to TfL guidance. The policy should also state a presumption that servicing should take place off street wherever possible to ensure consistency with London Plan Policy T7.	This could be achieved by including the first sentence of T4.1 in the Implementation section as point 1 of Policy T4 'Where possible, servicing and deliveries should take place within the curtilage of the development.' These changes are necessary to ensure soundness and consistency with the London Plan	<p>The Council's objective for this policy approach is to ensure that servicing and deliveries to and from a site can take place safely, without causing highways impacts or endangering vulnerable road users.</p> <p>However, the Council recognises the importance of ensuring the Plan is consistent with the London Plan, and therefore made the following wording change which is included in the modification table.</p> <p>Where possible, servicing and deliveries should take place off street, within the curtilage of the development.</p>
Reg19-E-013	Transport for London		Reg19-E-013/036	Transport	T4 Servicing a development			T4.3											We welcome the recommendation of accreditation schemes in T4.3.		Support noted.
Reg19-E-112	SEGRO	Gerald Eve	Reg19-E-112/027	Transport	T4 Servicing a development						Blank	No						Blank	SEGRO reiterates the representations made to the Regulation 18 version of the Local Plan (part 7(b)) [see Appended – Regulation 18 Draft Local Plan SEGRO response] .		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council's response has not changed.
Reg19-E-176	Port of London Authority	Capita	Reg19-E-176/008	Transport	T4 Servicing a development			T4.1			Blank	Blank						Blank	[Detailed Policy Comments (Part 1)] We welcome the addition of supporting text at paragraph T.4.1 to support Policy T4: Servicing a Development, to demonstrate consideration of the use of waterways for ongoing servicing and deliveries for developments located in close proximity to navigable waterways. As noted in our comments on the Reg 18 consultation, we would suggest this is a requirement in the policy itself.		Support noted. The Council notes that policies throughout the Local Plan are succinct, with implementation and justification text to support the policy.
Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/072	Transport	T4 Servicing a development														The wording of this policy is supported. Encouraging more environmentally friendly service vehicles is a must however, it is important to note that not all servicing will be achieved through electric vehicles.		Support noted.
Reg19-E-013	Transport for London		Reg19-E-013/037	Transport	T5 Airport			T5.4b											We welcome the addition of a reference to active travel in point 4b and the additional bullet point in the Planning Obligations section which states that 'Contributions may be sought from airport developments for improved public transport and active travel access to the airport.'		Support noted.

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Reg19-E-200	London City Airport		Reg19-E-200/001	Transport	T5 Airport														<p>To Whom it May Concern,</p> <p>London City Airport (‘LCY’ or the ‘airport’) welcomes the opportunity to respond to the draft Regulation 19 Local Plan consultation.</p> <p>LCY previously made submissions on the Draft Regulation 18 Local Plan, which comprised:</p> <ul style="list-style-type: none">• support for the overall objective of the plan to deliver a fairer Newham, including through the enabling of more sustainable transport options;• concern that the draft policies dealing with the airport (particularly T5) were unsound and must be revised;• concern that T5, as drafted, would compromise the Council’s ability to achieve its stated objectives for the Borough over the plan period; and• detail on other potential changes in the Local Plan. <p>This submission builds on the above points and reflects on the changes incorporated by the Council between the Regulation 18 and 19 drafts.</p>		Comment noted.
Reg19-E-200	London City Airport		Reg19-E-200/002	Transport	T5 Airport														<p>We have reviewed the Council’s responses to our Regulation 18 commentary and welcome the elements that have been taken forward into the current draft. In particular, the employment role which the airport can sustain within the area and the more balanced approach to the consideration of development proposals at the airport are positive changes to the document.</p>		Support noted.
Reg19-E-200	London City Airport		Reg19-E-200/003	Transport	T5 Airport							No							<p>However, there are a number of key elements which remain unchanged in the Reg 19 plan. In particular, Policy T5 continues to have a number of provisions which have not been positively prepared and would prejudice a full and balanced assessment of future applications at the airport. Our view remains that this is not sound policy and is inconsistent with national policy direction.</p>		Comment noted. A substantive response is contained in the London City Airport topic paper. The Council considers the policy to be justified and in conformity with the London Plan.

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Reg19-E-200	London City Airport		Reg19-E-200/005	Transport	T5 Airport									No					Representations on draft Policy T5 Our representations to the Regulation 18 Local Plan noted that Policy T5 required fundamental changes in order to be sound. We are encouraged to see that many of these comments have been adopted by Council, however key concerns remain in respect of: • T5 (4a) - in reference to a reduction in car parking on site; and [• T5.2 - the implementation table which continues to assert that reductions in the extant respite period, the introduction of night flights, the use of the airport for helicopters/drones, and use of the airport for freight purposes would be “unmitigatable and unacceptable”] Neither of these aspects of the policy have been justified, nor has the approach been supported by a robust evidence base.		A change to this policy approach has not been made. A future development proposal could reduce the amount of car parking on site. Policy T3 encourages the reduction of the quantity of car parking, making effective use of land and delivering Public Realm Net Gain (Policy D2). A substantive response is contained in the London City Airport topic paper. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-200	London City Airport		Reg19-E-200/006	Transport	T5 Airport									no					Representations on draft Policy T5 Our representations to the Regulation 18 Local Plan noted that Policy T5 required fundamental changes in order to be sound. We are encouraged to see that many of these comments have been adopted by Council, however key concerns remain in respect of: [• T5 (4a) - in reference to a reduction in car parking on site; and] • T5.2 - the implementation table which continues to assert that reductions in the extant respite period, the introduction of night flights, the use of the airport for helicopters/drones, and use of the airport for freight purposes would be “unmitigatable and unacceptable” Neither of these aspects of the policy have been justified, nor has the approach been supported by a robust evidence base.		A change to this policy approach has not been made. By the nature of the use of the airport, changes to the size, function, operating hours and frequency of the airport activity will cause negative impacts to local residents. Where those negative impacts would be unacceptable even following mitigation, development would not be supported. The Council has to balance various objectives in the development of the policy - and it is considered that some objectives (such as the need for housing) outweigh the case for supporting changes to the airport activity. A substantive response is contained in the London City Airport topic paper. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-200	London City Airport		Reg19-E-200/008	Transport	T5 Airport														Not positively prepared We have significant concerns with the reference at T5.2 to certain changes to the use and function of the airport being ‘un-mitigatable’ and having ‘unacceptable impacts’ to residents and future development proposals. The use of such terms is wholly inappropriate and pre-judges any development proposal that may come forward before the full environmental impacts are known and the mitigation quantified.		A change to this policy approach has not been made. Both the Airport's masterplan and national aviation policy have been given due consideration in the development of this policy. By the nature of the use of the airport, changes to the size, function, operating hours and frequency of the airport activity will cause negative impacts to local residents. Where those negative impacts would be unacceptable even following mitigation, development would not be supported. The Council has to balance various objectives in the development of the policy - and it is considered that some objectives (such as the need for housing) outweigh the case for supporting changes to the airport activity. A substantive response is contained in the London City Airport topic paper. The Council is satisfied that the plan remains sound without the proposed changes.

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Reg19-E-200	London City Airport		Reg19-E-200/009	Transport	T5 Airport														It is understood that housing development is a priority for the Borough. For the Royal Docks, it is important that the housing allocation and associated policies allow housing development alongside our operational airport. However, to impose such restrictive policies on an existing operational airport conflicts with national aviation policy, flies in the face of the presumption in favour of sustainable development required by the NPPF and also ignores Government aviation forecasts (published alongside the Jet Zero Strategy these predict growth of up to 11 million passengers per annum and 151,000 air transport movements at LCY).		A change to this policy approach has not been made. Both the Airport's masterplan and national aviation policy have been given due consideration in the development of this policy. By the nature of the use of the airport, changes to the size, function, operating hours and frequency of the airport activity will cause negative impacts to local residents. Where those negative impacts would be unacceptable even following mitigation, development would not be supported. The Council has to balance various objectives in the development of the policy - and it is considered that some objectives (such as the need for housing) outweigh the case for supporting changes to the airport activity. A substantive response is contained in the London City Airport topic paper. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-200	London City Airport		Reg19-E-200/010	Transport	T5 Airport									no					Not Justified The draft Local Plan provides no reasonable or convincing justification for the policy position taken in T5. Specifically, the requirement for airport development to reduce car parking on site, the limitation on freight services, and the moratorium on helicopters or drones services are not justified. To elaborate:		Comment noted. A substantive response is contained in the London City Airport topic paper.
Reg19-E-200	London City Airport		Reg19-E-200/011	Transport	T5 Airport														The size and location of parking at the airport has been consented under the CADP1 permission based on a passenger throughput, and sustainable travel initiatives are also secured via the approved Airport Travel Plan. Our approach to car parking is to maintain the current consented quantum so that as passenger numbers increase, the number of spaces per passenger will result in a net decrease. For example, the recent approval of an additional 2.5m passengers per annum without an equivalent uplift in parking capacity will result in a 28% net decrease in the number of parking spaces per passenger. The current wording of the Plan to seek a physical reduction in the number of parking spaces does not apply any reasonable justification. The approach is also at odds with London Plan policy T6 which for an airport use requires car parking to be determined on a case by case basis.		A change to this policy approach has not been made. A future development proposal could reduce the amount of car parking on site. Policy T3 encourages the reduction of the quantity of car parking, making effective use of land and delivering Public Realm Net Gain (Policy D2). A substantive response is contained in the London City Airport topic paper. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-200	London City Airport		Reg19-E-200/012	Transport	T5 Airport														To quote from the Implementation Table at T5.2 (p. 340), "The planning conditions and planning obligations on the CADP Permission are therefore the only ones that regulate the airport's operations." We agree with this statement and highlight this as a reason why it is not appropriate for the Local Plan to seek to control specific operational activities such as aircraft types (including freighter aircraft, helicopters and drones) or their payload.		Comment noted. A substantive response is contained in the London City Airport topic paper.

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Reg19-E-200	London City Airport		Reg19-E-200/013	Transport	T5 Airport									no					There may be scope for limited freight services or higher value smaller freight items to transit through the airport, which could be of significant benefit to exporters or importers in Newham or the surrounding East London local area. Ruling out the use of any spare belly hold capacity for flights which are already operating would be inefficient and is not justified. Further, if a freight operator sought certification of a freighter aircraft to operate from the airport, then it would be required to comply with the stringent controls secured by the existing CADP consent, particularly concerning noise, hours of operation and the total number of movements per year.		A change to this policy approach has not been made. It is considered that development that would encourage greater use of the airport by dedicated freight planes (thereby increases the number of goods vehicle trips) would result in un-mitigatable and unacceptable impacts to existing local residents and to development proposals for new homes. A substantive response is contained in the London City Airport topic paper. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-200	London City Airport		Reg19-E-200/014	Transport	T5 Airport														Given that the Council does not have the power to control what is carried by aircraft, it is in the interest of both the Council and the airport to locate freight services at the airport. This ensures that times and quantities of freight delivery can be managed from a facility on airport where it can be stored until ready to be dispatched to a waiting aircraft. Ultimately this will benefit the local road network through active management of deliveries. The policy as currently worded would mean that freight deliveries would happen directly to the airport in an ad hoc manner with no opportunity to manage and consolidate the loads.		A change to this policy approach has not been made. It is considered that development that would encourage greater use of the airport by dedicated freight planes (thereby increases the number of goods vehicle trips) would result in un-mitigatable and unacceptable impacts to existing local residents and to development proposals for new homes. A substantive response is contained in the London City Airport topic paper. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-200	London City Airport		Reg19-E-200/015	Transport	T5 Airport														Imposing a blanket restriction on helicopters or drones ignores future changes in technology which are already being trialled internationally and in the UK, with support in Government policy such as Flightpath to the Future. Electric Vertical Take Off and Landing (eVTOL) aircraft could revolutionise short distance journeys whilst being much quieter and cleaner than helicopters. It is important the policy does not preclude their potential use without first examining the benefits and impacts of such a proposal.		A change to this policy approach has not been made. It is considered that the use of the airport site for helicopters or drones would result in unmitigatable and unacceptable impacts to existing local residents and to development proposals for new homes. A substantive response is contained in the London City Airport topic paper. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-200	London City Airport		Reg19-E-200/016	Transport	T5 Airport														Not effective We welcome the tempering of the previous drafting which stated that any airport development would lead to unacceptable adverse impacts to local residents.		Comment noted.

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Reg19-E-200	London City Airport		Reg19-E-200/017	Transport	T5 Airport										no				The removal of this previous statement is supported, however the ‘un-mitigatable’ and ‘unacceptable impacts’ and the reduction in approved car parking quoted in the current draft Plan are not effective due to the following reasonsWith respect to potential ‘un-mitigatable’ uses, it is inconsistent and incompatible with the Strategic Plan for London (the 2021 London Plan) which in Policy T8 (Aviation), whilst supporting the principle of role of airports strategic role in growth especially in Opportunity Areas (i.e. including LCY), adopts a criteria based approach to the consideration of airport development proposals. Such criteria requires there to be acceptable environmental and surface access impacts and does not preclude growth and other changes		A change to this policy approach has not been made. By the nature of the use of the airport, changes to the size, function, operating hours and frequency of the airport activity will cause negative impacts to local residents. Where those negative impacts would be unacceptable even following mitigation, development would not be supported. The Council has to balance various objectives in the development of the policy - and it is considered that some objectives (such as the need for housing) outweigh the case for supporting changes to the airport activity. A substantive response is contained in the London City Airport topic paper. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-200	London City Airport		Reg19-E-200/018	Transport	T5 Airport										no				The removal of this previous statement is supported, however the ‘un-mitigatable’ and ‘unacceptable impacts’ and the reduction in approved car parking quoted in the current draft Plan are not effective due to the following reasons [...]With respect to the specific requirement to reduce car parking on site, it is inconsistent with London Plan Policy T6 which applies maximum parking standards and would require a case by case assessment of airport related development proposals to establish an appropriate quantum of parking. Further, it runs against the Local Plan’s own draft policy T3 (1b) which defers the assessment of parking quantum to the London Plan standards i.e. Policy T6.		A change to this policy approach has not been made. A future development proposal could reduce the amount of car parking on site. Policy T3 encourages the reduction of the quantity of car parking, making effective use of land and delivering Public Realm Net Gain (Policy D2). A substantive response is contained in the London City Airport topic paper. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-200	London City Airport		Reg19-E-200/019	Transport	T5 Airport										no				The removal of this previous statement is supported, however the ‘un-mitigatable’ and ‘unacceptable impacts’ and the reduction in approved car parking quoted in the current draft Plan are not effective due to the following reasons [...]The policy position precluding freight is inconsistent with the current Local Plan draft Policy J1. Under this policy ‘Land East of London City Airport’ is allocated as a Local Industrial Location (LIL5) which identifies freight as one of the priority uses (along with transport and distribution/logistics). Even if freight were to be removed from LIL5, it arguable that transport, distribution and logistics all deal with freight. Whether the freight is eventually transported by aircraft isn’t necessarily relevant in land use terms. What is relevant is that such uses are invited in LIL5, with each proposal assessed through a planning application in the usual way.		A change to this policy approach has not been made It is considered that development that would encourage greater use of the airport by dedicated freight planes (thereby increases the number of goods vehicle trips) would result in un-mitigatable and unacceptable impacts to existing local residents and to development proposals for new homes. A substantive response is contained in the London City Airport topic paper. The Council is satisfied that the plan remains sound without the proposed changes.

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Reg19-E-200	London City Airport		Reg19-E-200/020	Transport	T5 Airport										no				The removal of this previous statement is supported, however the ‘un-mitigatable’ and ‘unacceptable impacts’ and the reduction in approved car parking quoted in the current draft Plan are not effective due to the following reasons [...]In terms of new technologies such as eVTOL, it remains important for development proposals at airports to be considered on a case-by-case basis in terms of their benefits when viewed against impacts. There is clear potential that new technological developments would deliver many tangible benefits to Newham and its residents, through the use of cleaner, quieter aircraft and other industries that could support them.		A change to this policy approach has not been made. By the nature of the use of the airport, changes to the size, function, operating hours and frequency of the airport activity will cause negative impacts to local residents. Where those negative impacts would be unacceptable even following mitigation, development would not be supported. The Council has to balance various objectives in the development of the policy - and it is considered that some objectives (such as the need for housing) outweigh the case for supporting changes to the airport activity. substantive response is contained in the London City Airport topic paper. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-200	London City Airport		Reg19-E-200/021	Transport	T5 Airport														Not consistent with National policy The above position, whereby future airport operations should be assessed on a case by case basis, is clearly detailed in national policy. Policy T5 remains inconsistent with national policy in the following ways• Aviation Policy Framework (2013) (APF) – The APF acknowledges the aviation sector as a major contributor to the long-term economic growth of the UK. It also recognises the role airports have in ...creating local jobs and fuelling opportunities for economic rebalancing in their wider region or area. The APF supports the growth of airports subject to a balance being struck between the benefits of aviation and the negative effects on climate change, noise and air quality. Key potential industries where appropriate, low impact growth could be achieved could include freight and vertical movements, and any such application for infrastructure to support changes in these operations would be accompanied by an environmental impact assessment. Policy T5 needs to have specific regard to the APF, as well as subsequent statement of Government policy on aviation, such as the Airports National Policy Statement, Beyond the Horizon, Flightpath to the Future and the Jet Zero Strategy.		A change to this policy approach has not been made. Both the Airport's masterplan and national aviation policy have been given due consideration in the development of this policy. By the nature of the use of the airport, changes to the size, function, operating hours and frequency of the airport activity will cause negative impacts to local residents. Where those negative impacts would be unacceptable even following mitigation, development would not be supported. The Council has to balance various objectives in the development of the policy - and it is considered that some objectives (such as the need for housing) outweigh the case for supporting changes to the airport activity. A substantive response is contained in the London City Airport topic paper. The Council is satisfied that the plan remains sound without the proposed changes.

Transport Comments																			Proposed modifications and explanation	LB Newham Response
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?		
Reg19-E-200	London City Airport		Reg19-E-200/022	Transport	T5 Airport															<p>A change to this policy approach has not been made. Both the Airport's masterplan and national aviation policy have been given due consideration in the development of this policy. By the nature of the use of the airport, changes to the size, function, operating hours and frequency of the airport activity will cause negative impacts to local residents. Where those negative impacts would be unacceptable even following mitigation, development would not be supported. The Council has to balance various objectives in the development of the policy - and it is considered that some objectives (such as the need for housing) outweigh the case for supporting changes to the airport activity. A substantive response is contained in the London City Airport topic paper. The Council is satisfied that the plan remains sound without the proposed changes.</p>

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Reg19-E-200	London City Airport		Reg19-E-200/023	Transport	T5 Airport														Not consistent with National policy The above position, whereby future airport operations should be assessed on a case by case basis, is clearly detailed in national policy. Policy T5 remains inconsistent with national policy in the following ways [...]• Flightpath to the Future (2022) (FttF) – This document is the Government’s strategic framework for the aviation sector and deals directly with the growth of airports. It states that: “...the Government remains supportive of airport expansion where it can be delivered within our environmental obligations. The Government is supportive of airports bringing forward plans by way of our existing policy frameworks for airport planning.”. These policy frameworks are the APF and MBU policy documents referred to above. Policy T5 does not allow airport proposals related to the ‘un-mitigable’ and ‘unacceptable’ matters to be brought forward in line with the government policy frameworks, therefore is at odds with the FttF policy.		A change to this policy approach has not been made. It is considered that development that would encourage greater use of the airport by dedicated freight planes (thereby increases the number of goods vehicle trips) would result in un-mitigatable and unacceptable impacts to existing local residents and to development proposals for new homes. A substantive response is contained in the London City Airport topic paper. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-200	London City Airport		Reg19-E-200/024	Transport	T5 Airport							No							It is therefore clear that draft Policy T5 is unsound. Both the policy and supporting text must be redrafted so that it is positively prepared, justified, effective and consistent with national policy. The supporting text and the implementation policies, in particular, require a revised approach. Annex 1 sets out recommend changes to the policy and supporting text.		Comment noted. A substantive response is contained in the London City Airport topic paper. The Council considers the policy to be justified and in conformity with the London Plan.
Reg19-E-200	London City Airport		Reg19-E-200/025	Transport	T5 Airport														Representations to other policies N2 North Woolwich The overall vision for North Woolwich continues to be supported by the airport, including to aim of overcoming severance issues and improving green spaces, including the public realm at KGV DLR station.		Support noted.

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Reg19-E-200	London City Airport		Reg19-E-200/026	Transport	T5 Airport														We note that commentary on a potential Elizabeth Line station is found at Policy T5 but we suggest that this section could also reference the Council’s position, noting that such a station would benefit the wider area as well as the airport. The commentary found in the Annex 1 to this letter regarding the implementation of Policy T5 suggests alternative text that could be inserted into this section.While we acknowledge the Council’s position on the station is that it should be ‘privately funded’, there is the opportunity to provide greater emphasis on the location and benefits to North Woolwich in this section, particularly in overcoming the severance issues in the area, supporting further shifts toward sustainable transport and encouraging greater investment in the area. The airport is fully supportive of a new Elizabeth Line station which would also improve connectivity between LCY and the wider London transport network.		Comment noted. Discussions with both Transport for London and our consultants working on our Sustainable Transport Strategy, concluded that a station is not necessary to support the levels of growth in the Royal Docks, and that a station may lead to increased operating costs for TfL. We have therefore considered that safeguarding land for a station is not required.
Reg19-E-200	London City Airport		Reg19-E-200/035	Transport	T5 Airport														Our Regulation 18 submission stated that the policy heading should reflect the subject of the policy, namely London City Airport. This has not been adopted in the Regulation 19 draft. Changing the title would ensure its purpose is clear and would ensure the Local Plan is consistent with the approach taken in Local Plans elsewhere. Examples of other Local Plans with DM policy titles that name the airport are the London Borough of Hillingdon (Heathrow Airport), Crawley Borough Council (Gatwick Airport) and Uttlesford Borough Council (Stansted Airport). It also strikes us as odd that the policy text refers specifically to London City Airport throughout, yet the title is a generic ‘Airport’.	Amend title as per below: “T5: London City Airport ”	<p>The Council notes the proposed modification. This is not considered necessary for soundness. However the Council understands the reasons for the proposal and considers that consistency with other Local Plans is an appropriate reason to change the name of the policy.</p> <p>Therefore, if they are further proposed by the Inspector, the Council would be supportive of these modifications being made. It has therefore made the following wording change which is included in the modification table.</p> <p>T5: Airport T5: London City Airport</p>
Reg19-E-200	London City Airport		Reg19-E-200/036	Transport	T5 Airport			T5.2											LCY notes the revised wording which provides additional clarity in relation to potential impacts on residents. However, the second half of the provision, which refers to future residents, remains ambiguous in relation to the Agent of Change principle, where it could be interpreted that the airport would be required to mitigate against any future developments that may come forward (being the changing agent). amendments to the wording are required for clarify.	Revise as follows: : “2. Development proposals at London City Airport must mitigate negative impacts on local residents. Development which would result in an increase in unacceptable negative impacts to existing local residents and to development proposals consented development for new homes and their future residents, will not be supported.”	Comment noted. A substantive response is contained in the London City Airport topic paper.

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Reg19-E-200	London City Airport		Reg19-E-200/037	Transport	T5 Airport			T5.3											Our Regulation 18 response gave strong support of this policy, which aligns with its recently published plans to become London’s first Net Zero emissions airport. amendments were suggested for flexibility, which continue to be relevant and are proposed for adoption. These changes were not adopted by Council, on the basis of Council not wishing to “bake in” low carbon technology. While we understand the Council’s position, our concern is that where zero carbon technologies may not be feasible, low carbon should then be supported as these will assist in the development of zero carbon technology. LCY has clear commitments for net zero and use of low carbon technologies where these are the best available in the industry.	Revise as follows:: “3. Development that facilitates the development or use of zero carbon technologies at the airport will be supported, where this deliverable, technically feasible and do not adversely impact local residents.”	<p>The Council notes the proposed modification. This is not considered necessary for soundness. However the Council understands the reasons for the proposal and considers that encouraging the airport to develop zero carbon technology would support the policy.</p> <p>Therefore, if they are further proposed by the Inspector, the Council would be supportive of these modifications being made. It has therefore made the following wording change which is included in the modification table.</p> <p>3. Development that facilitates the development or use of zero carbon technologies at the airport will be supported</p>
Reg19-E-200	London City Airport		Reg19-E-200/038	Transport	T5 Airport			T5.4											We previously stated that the objective of improving sustainable access to the airport is generally supported. The airport’s surface transport strategy does not envisage any increase in our parking capacity so that with future passenger growth, the number of parking spaces per passenger will decrease. We are opposed to any policy that requires a physical reduction in the level of parking at the airport. While we are making every effort to encourage sustainable modes of transport for passengers and staff, a reduction in car parking is not practical or realistic. There will always be passengers that rely on parking due to luggage or group size, and the current DLR operating hours means that our earliest departures do not align with DLR start time. The policy is also inconsistent with London Plan policy T6. This sets the maximum parking standards for different land uses, however airport use is not defined. In this case, policy T6 advises a case by case assessment taking into account PTAL and other sustainable measures available. The airport continues to fully support the principle of proportionately limiting any parking proposed in future to encourage and incentivise travel by sustainable modes. However, our comment stands that Council cannot require a reduction in car parking by the airport, particularly where this parking has been secured in our CADP1 planning permission and no parking limit has been conditioned.	Revise to read as follows: “5. Development proposals should improve sustainable access to the airport site for both airport passengers and staff like . Such improvements could include (but not limited to): a. Development that does not increase the level of parking beyond what has previously been consented. b. Development that makes improvements to public transport access to the airport.	<p>A change to this policy approach has not been made. A future development proposal could reduce the amount of car parking on site. Policy T3 encourages the reduction of the quantity of car parking, making effective use of land and delivering Public Realm Net Gain (Policy D2). A substantive response is contained in the London City Airport topic paper. The Council is satisfied that the plan remains sound without the proposed changes.</p>

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Reg19-E-200	London City Airport		Reg19-E-200/039	Transport	T5 Airport				3.33 9										This figure should be amended to qualify to a specific year. In 2023, 53% of staff drove a single occupancy vehicle to work.	Delete and replace with: 3.389 (However, nearly 60 per cent of staff still use private cars to travel to the airport.) “In 2023, 53% of staff drove a single occupancy vehicle to the airport. “	The Council notes the proposed modification. This is not considered necessary for soundness. However the Council recognises the importance of ensuring the Plan is factually accurate. Therefore, if they are further proposed by the Inspector, the Council would be supportive of these modifications being made. It has therefore made the following wording change which is included in the modification table. i. Radar stations and sightline ii. Rail (including National Rail, Elizabeth line, Tube, DLR) lines , stations and depots iii. Buses – priority measures, stands (including drivers’ facilities), stations and depots/ garages iv. Protected mooring points, public river access points and piers v. Bridges and tunnels vi. Safeguarded wharves and their access requirements vii. Rail heads and their access requirements viii. London City Airport (including the Public Safety Zone and Aerodrome Safeguarding requirements) ix. London Cable Car
Reg19-E-200	London City Airport		Reg19-E-200/040	Transport	T5 Airport				3.34 8										We reiterate our previous comments that the CADP consent already contains robust conditions for the control of noise, hours of operation and a delivery and servicing plan.Freight that travels on passenger aircraft supports national and international trade and brings direct and indirect economic and employment benefits. Cargo functions at the airport would complement employment allocations close the airport. Typically freight movements take place as ‘belly hold’ cargo which is carried in the hold of scheduled passenger flights and do not therefore necessarily increase the number of flights. By doing so it can improve the viability of some routes by potentially allowing airlines to lower ticket prices and offer more choice. It is also relevant that the Council does not have the power to control freight volumes on passenger aircraft within the existing airport infrastructure. Any proposal to increase freight infrastructure at the airport would be subject to a planning application which the Council would be required to assess on its merits.	Amend as follows: “3.348 London City Airport has historically been a passenger focused site, with very small freight volumes. In light of this – the Council would not support dedicated freight planes using the airport or a large increase in freight volumes on passenger aircraft, especially given the consequential rise in goods vehicle trips that would result from these flights. Nor are proposals to introduce helicopters or other noisy aerial uses such as commercial sized drones supported, in light of the adverse impacts to local residents and housing sites in close proximity to the airport. Proposals which result in significant changes in freight volumes at the airport should demonstrate that the changes can be accommodated in environmental and transport terms.”	A change to this policy approach has not been made It is considered that development that would encourage greater use of the airport by dedicated freight planes (thereby increases the number of goods vehicle trips) would result in un-mitigatable and unacceptable impacts to existing local residents and to development proposals for new homes. A substantive response is contained in the London City Airport topic paper. The Council is satisfied that the plan remains sound without the proposed changes.

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Reg19-E-200	London City Airport		Reg19-E-200/041	Transport	T5 Airport					T5.2						no			We have previously explained that the text in this section pre-judges any future airport proposal and is at odds with national policy concerning what local authorities must consider when assessing any application for airport growth. Namely, as stated in nation aviation policy (see covering letter), airport proposals should be judged by the relevant local authority, taking careful account of all relevant considerations, particularly economic and environmental impacts alongside proposed mitigations. The wording also conflicts with the NPPF where, at paragraph 11 it states that should a proposal come forward that demonstrates that all impacts can be mitigated, then the Council is required to grant an approval The approach also fails to reflect relevant policies in the London Plan. For example, London Plan policy T8 already sets out criteria to consider changes at London’s airports (including LCY) and there is no need to duplicate or introduce additional and inconsistent policies. Beyond the inconsistencies with national and London policy, the ‘un-mitigatable’ assertions in this section along with the proposed restrictions on development at the airport also seem to lack any clear justification within the Council’s own evidence base.	Delete in its entirety. It is considered that the following changes in the use and function of the airport would result in an un-mitigatable and unacceptable impacts to existing local residents and to development proposals for new homes.	A change to this policy approach has not been made. By the nature of the use of the airport, changes to the size, function, operating hours and frequency of the airport activity will cause negative impacts to local residents. Where those negative impacts would be unacceptable even following mitigation, development would not be supported. It is considered that reducing the extant respite period or the introduction of night flights would result in an un-mitigatable and unacceptable impacts to existing local residents and to development proposals for new homes. A substantive response is contained in the London City Airport topic paper. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-200	London City Airport		Reg19-E-200/042	Transport	T5 Airport					T5.2									While the airport has no plans to introduce helicopters or drones to the airport at this point in time, it is important not to pre-judge or dismiss future technologies and economic benefits they could bring. As written, the text precludes the introduction of new technologies such as electric Vertical Take-off and Landing (eVTOL) aircraft. By using electric power they are expected to be much cleaner and quieter than traditional forms of vertical take-off or rotary aircraft such as helicopters. Trials are underway and certification for civil flight is expected to follow. Until evidence of their benefits and potential environmental impacts becomes available there is no basis for the current local plan to rule them out. In terms of conventional helicopters, there is already a condition restricting there use in the CAPD1 consent. However, the current wording prevents any balanced assessment of a change to this condition should an application be made in future.	Delete in its entirety. Development that would enable the use of the airport site for helicopters or drones.	A change to this policy approach has not been made. It is considered that the use of the airport site for helicopters or drones would result in unmitigatable and unacceptable impacts to existing local residents and to development proposals for new homes. A substantive response is contained in the London City Airport topic paper. The Council is satisfied that the plan remains sound without the proposed changes.

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Reg19-E-200	London City Airport		Reg19-E-200/043	Transport	T5 Airport					T5.2									The Council does not the ability to control the types of aircraft that use the airport, beyond the controls conditioned in the CADP consent. We believe the Council’s concerns relating to vehicle movements associated with freight is unfounded. This is because development that deals with goods on the airport site will help to manage goods vehicles in a far more efficient way than goods coming from surrounding industrial estates in an ad hoc manner. There is also no clear link in this section to a potential impact on the local community arising from the use of air freight at the airport, beyond what could be assessed in a Transport Impact Assessment. In particular, there is no link that such a provision would directly result in reduced provision of housing in the Borough (as was reasoned in the response to our previous Regulation 18 comments).The policy position also appears to be at odds with Policy J1, specifically LIL5: Land East of London City Airport which identifies freight among other acceptable uses.	Delete in its entirety. Development that would encourage greater use of the airport by freight planes and increases the number of goods vehicle trips.	A change to this policy approach has not been made It is considered that the development that would encourage greater use of the airport by dedicated freight planes (thereby increases the number of goods vehicle trips) would result in un-mitigatable and unacceptable impacts to existing local residents and to development proposals for new homes. A substantive response is contained in the London City Airport topic paper. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-200	London City Airport		Reg19-E-200/044	Transport	T5 Airport					T5.6									Early engagement with LCY on these matters is supported. It is recommended that bird risk is also mentioned here for consistency.	Amend as follows: “Development in proximity to the airport should demonstrate consideration of London City Airport at the time of submission. This could include noise, air quality, safety, bird risk , wider Agent of Change principles, and height limitations (including construction cranes).”	<p>The Council’s objective for this policy approach is to ensure that applicants ensure that their developments do not impact airport safety.</p> <p>However, the Council recognises the importance of ensuring the Plan is consistent and has therefore made your wording change which is included in the modification table.</p> <p>This could include noise, air quality, safety, bird risk, wider Agent of Change principles, and height limitations (including construction cranes).</p>
Reg19-E-200	London City Airport		Reg19-E-200/045	Transport	T5 Airport					T5.7									In addition to the comments provided in relation to Part 2 at Annex 3, the policy should alert developers to potential safeguarding conflicts early on in the design process. Note that the assessment at Annex 3 has been undertaken on the basis of the proposed building height limits shown in Part 2 of the local plan. If these are exceeded, or additional proposals are contemplated which assume heights above these limits, then this may impact our advice.	Amend as follows: “Applicants that propose developments in proximity to the airport should discuss the potential implications of the development with London City Airport and the Council’s planning team as early as possible. Details regarding height limitations, noise contours and the Public Safety Zone can be found on the Council’s website. The outcomes of discussions with London City Airport should be shared with the Council as part of any application. Future development close to the airport has potential to impact on airport safeguarding. Analysis will need to be undertaken by London City Airport to confirm that safe development can proceed in relation to the Obstacle Limitation Surface (OLS), as well as potential limitation of the Instrument Flight Procedures (IFP) and/or Instrument Landing Systems (ILS). This may include referral to NATS and relevant airlines, as well as implementation of mitigation measures on future developments. ”	<p>The Council’s objective for this policy approach is to ensure that applicants ensure that their developments do not impact airport safety.</p> <p>The Council considers that the level of detail proposed in the wording change is too detailed for the Local Plan. However, the Council recognises the importance of ensuring that the Plan is consistent and clear, and has therefore proposed a wording change which is included in the modification table.</p> <p>Development in proximity to the airport has the potential to impact on airport safeguarding. Applicants that propose developments in proximity to the airport should discuss the potential implications of the development with London City Airport and the Council’s planning team as early as possible.</p>

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Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/073	Transport	T5 Airport														TSP agrees with Part 6 of the policy which states that development within close proximity of the airport needs to consider a range of factors including the agent of change principle, height and noise limitations. This has occurred in relation to Silvertown.		Support noted.
Reg19-E-225	London Borough of Greenwich		Reg19-E-225/011	Transport	T5 Airport														London City Airport 1.20 Policy T5 focuses on London City Airport, its development and operation and the management of effects. In discussing the policies implementation, the consultation document notes at T5.6 that ‘development in proximity to the airport should demonstrate consideration of London City Airport at the time of submission’. It notes that this ‘could include noise, air quality, safety, wider Agent of Change principles, and height limitations (including construction cranes.’	With regards to Agent of Change principles, Royal Greenwich seeks that the same lens is applied to the City Airport with regards to any applications that seek to alter the airport’s operation which would have unacceptable impacts upon residents of the Royal Borough of Greenwich, particularly with regards to noise and air quality.	A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers that the airport policy would be effective in assessing any application that would impact residents, including those in the Royal Borough of Greenwich. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-225	London Borough of Greenwich		Reg19-E-225/012	Transport	T5 Airport														1.21 Royal Greenwich’s position with regards to any proposed changes to the Airport’s operations remains the same as that outlined in the raised objection by Royal Greenwich to the most recent Section 73 application by the Airport to the London Borough of Newham.		Comment noted.

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Reg19-E-007	David Gilles		Reg19-E-007/033	Transport							Blank	Blank						Blank	<p>14 Transport P347 on</p> <p>Transport generally: Sources should be quoted where possible otherwise text will not be believed. In para 5 on P347 the last sentence should be changed to read “By encouraging the reduced use of private vehicles.....”</p> <p>It would be helpful for the Plan to recognise that motorists are not enemies in their own right and are an important lobby in Newham that needs to be recognised. This “lobby” does not trust the Council and believes that it now seeks to penalise motorists in all ways possible, using the Climate Emergency as a pretext. These views cannot be wished away. Essentially the tenor of the Transport section needs to change from one of seeming to punish to one of encouragement to change with carrots along the way in terms of an improved transport infrastructure and frequency/cost of public transport. A paragraph of text should be added stating that:</p> <p>“High volume traffic and heavy vehicles erode road surfaces causing deterioration and potholes, and more regular resurfacing work will be required. A road resurfaced in a low traffic neighbourhood will not require such regular resurfacing work. Any maintenance required could therefore be spread over more years, bringing economic efficiency in the longer term”.</p> <p>The road resurfacing programme should be reconfigured to resurface roads within new LTNs as a priority. This will be a carrot for car users’ resident in a low traffic neighbourhood who will benefit from resurfaced roads, and also be a financially prudent priority for the Council.</p>		<p>Comment noted. A change to this policy approach has not been made. Newham has a target of 83 per cent of all trips to be made on foot, by cycle or using public transport by 2041, set in the Mayor of London’s Transport Strategy. The Local Plan therefore discourages car use, and encourages the use of active travel and public transport. Decisions regarding the resurfacing of roads is not a planning matter, and is the remit of the Newham Highways department.</p>
Reg19-E-013	Transport for London		Reg19-E-013/004	Transport															<p>We also welcome the continued support for public transport and active travel improvements, including major projects at Stratford station and potential DLR extensions.</p>		<p>Support noted.</p>
Reg19-E-013	Transport for London		Reg19-E-013/005	Transport															<p>We are pleased to note the commitment to a network of well-connected neighbourhoods across the borough, implementation of Low Traffic Neighbourhoods and School Streets, and adoption of the Healthy Streets Approach.</p>		<p>Support noted.</p>
Reg19-E-013	Transport for London		Reg19-E-013/006	Transport															<p>We strongly support the requirement for all development to be car free and also welcome the addition of references to locally specific mode share targets and the Mayor’s Vision Zero road safety objective.</p>		<p>Support noted.</p>

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Reg19-E-014	CPRE		Reg19-E-014/013	Transport															[The majority of the concerns outlined in our response to the regulation 18 consultation last year have still not been addressed:] 6. Main roads should be limited to one lane only, for general traffic, to support delivery of the Mayor’s Transport Strategy targets and reduce the negative impact of roads in terms of severance and health. Remaining space should be re-allocated for bus or cycle lanes, wider pavements, or SUDS / trees etc, or in certain circumstances, even built development.		Comment noted. Policy T3.2 states that "Development which results in the loss of existing car parking or excess road space would be supported." The Sustainable Transport Strategy considers how road space could be reallocated for better uses (including cycling, walking, wider pavements and greenery).
Reg19-E-014	CPRE		Reg19-E-014/014	Transport															[The majority of the concerns outlined in our response to the regulation 18 consultation last year have still not been addressed:] 7. A Kerbside Space policy should be introduced. A huge amount of land is currently deployed as kerbside space – used mainly for parking private cars. Given the London Mayor’s Transport Strategy needs to underpin the Newham Local Plan, a policy should be included which recognised the importance of reallocating this space for sustainable uses which support both active travel and environment goals. Specifically, a policy should be included for reallocation of a minimum of 25% of Newham’s kerbside, referencing environmental and social goals and establishing an appropriate target for reinstating kerbside as a public space, to be used for everything from bus and cycle lanes, safe cycle storage, shared mobility parking, delivery hubs, rain gardens, tree planting on build-outs, EV charging points on build-outs, parklets, pocket parks, play on the way features/play trails, and whole streetparks (e.g. as per Lambeth Council’s recent Kerbside Strategy); and supporting delivery hubs and shared mobility hubs (car share, bike share etc).		Comment noted. Policy T3.2 states that "Development which results in the loss of existing car parking or excess road space would be supported." The Sustainable Transport Strategy considers how road space could be reallocated for better uses (including cycling, walking, wider pavements and greenery).
Reg19-E-015	Greater London Authority		Reg19-E-015/027	Transport															Transport The Mayor welcomes the continued support for public transport and active travel improvements, including the potential DLR extension		Support noted.
Reg19-E-015	Greater London Authority		Reg19-E-015/028	Transport															Transport The Mayor welcomes the continued support for public transport and active travel improvements, including [the potential DLR extension] and potential major project at Stratford station.		Support noted.
Reg19-E-015	Greater London Authority		Reg19-E-015/029	Transport															Also welcomed is the commitment to a network of well-connected neighbourhoods across the borough		Support noted.

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Reg19-E-015	Greater London Authority		Reg19-E-015/030	Transport															Also welcomed is the commitment to [a network of well-connected neighbourhoods across the borough], implementation of Low Traffic Neighbourhoods and School Streets		Support noted.
Reg19-E-015	Greater London Authority		Reg19-E-015/031	Transport															Also welcomed is the commitment to [a network of well-connected neighbourhoods across the borough, implementation of Low Traffic Neighbourhoods and School Streets], and adoption of the Healthy Streets Approach.		Support noted.
Reg19-E-015	Greater London Authority		Reg19-E-015/032	Transport															The requirement for all development to be car free is strongly supported		Support noted.
Reg19-E-015	Greater London Authority		Reg19-E-015/033	Transport															[The requirement for all development to be car free is strongly supported] and the addition of references to locally specific mode share targets [and the Mayor’s Vision Zero road safety objective] is noted and welcomed too.		Support noted.
Reg19-E-015	Greater London Authority		Reg19-E-015/034	Transport															[The requirement for all development to be car free is strongly supported and the addition of references to locally specific mode share targets] and the Mayor’s Vision Zero road safety objective is noted and welcomed too.		Support noted.
Reg19-E-020	National Highways		Reg19-E-020/003	Transport							Blank	Yes						Blank	<p>Initial Review of Newham Related Vehicle Trips</p> <p>Given that Newham is located some distance from the SRN we have initially considered the likelihood of traffic to and from the Borough using the SRN based upon 2011 Census Journey to Work Data.</p> <p>The Newham Local Plan includes provision for approximately 50,000 homes and a similar number of new jobs. Given these statistics and the commuting information from the 2011 Census it is expected that overall, the Newham Local Plan is not expected to have any major impacts upon the SRN as a whole. Outbound commuting is not expected to lead to any issues. Inbound commuting may lead to issues at isolated locations, in particular at junctions around the M25 or on the M11 or A13, if sufficient additional traffic is geared towards specific locations.</p> <p>The assessment will therefore be concerned with the impacts of inbound commuting upon the SRN, in addition to the adherence of the Local Plan to national policy in relation to the DfT Circular 01/2022. We see this as a proportionate approach to the Local Plan from a National Highways perspective given the distance from the SRN and the likelihood of any development impacts causing a severe impact or unacceptable safety concern as outlined in NPPF.</p>		Comment noted. This comment has been subject to further discussion with National Highways. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report.

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Reg19-E-020	National Highways		Reg19-E-020/004	Transport							Blank							Blank	<p>Transport Modelling and Implications for the SRN</p> <p>We have examined the Newham Sustainable Transport Strategy (July 2024) to explain how the growth can be accommodated on the transport networks in and around Newham. As described above we have confined the potential area of concern outside London and relates purely to commuting traffic into and out of London during peak hours by non-London residents.</p> <p>Our understanding is that the sustainable transport strategy itself is not based upon any specific model runs for the Local Plan but is, as stated in Section 2.7, based upon the review of modelling undertaken by TfL for the Royal Docks and Beckton Riverside Opportunity Area (OA). An uplift is then applied to represent the Local Plan as a whole.</p> <p>We are interested with the highway modelling undertaken. From paragraph 2.7.10 we understand that an additional 14,673 peak hour trips by all modes will be generated by 2041, approximately 6% of which will be by motor vehicle. We note paragraph 2.7.14 that states “Other key destinations include outside of London for longer-distance trips, representing an opportunity for targeted interventions to reduce reliance on the private vehicle and promote the uptake of public transport.”</p> <p>Given the location of most of the employment growth to the eastern and southern areas of the borough they are more easily accessible using the A13 and A406. The A13 to the east is part of the strategic road network under the stewardship of National highways outside London. The A406 connects directly to the M11 north of the borough, also part of the strategic road network. These allow direct access to the employment locations making the sites accessible by car from outside London.</p>	<p>We would therefore like more information on the additional volumes of peak hour traffic entering and leaving London via the A13 to the east and joining and leaving the A406 via the M11 to the north of the borough to understand any potential impacts on the strategic road network. We will then be able to determine whether we are supportive of the Local Plan or require further assessment to examine potential mitigation requirements for the network. This information should be available from LoHAM model assignments.</p>	<p>Comment noted. This comment has been subject to further discussion with National Highways. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report.</p>

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Reg19-E-065	Stratford Original BID		Reg19-E-065/004	Transport							Blank	Blank						Blank	[Following our participation to two consultation events where we shared our feedback, I further submit a summary of points we discussed around the Local Plan. Most of the points do endorse Newham Local Plan Neighbourhoods/Inclusive Economy. There are some additional recommendations as expansion to existing points (i.e. Inclusive economy, J1 and active frontages). None of the following points challenge or question the soundness and legal ground of local plan review. These are as follows:] - Wayfinding is a major challenge, further connecting the two sides of new and traditional Stratford town centre. More commitment and investment are required which should start from within Stratford Station and extend to the surroundings.		Comment noted. Neighbourhood policies include improvements to wayfinding and connectivity across Stratford Central, as set out in N8.SA1.
Reg19-E-065	Stratford Original BID		Reg19-E-065/008	Transport							Blank	Blank						Blank	[Following our participation to two consultation events where we shared our feedback, I further submit a summary of points we discussed around the Local Plan. Most of the points do endorse Newham Local Plan Neighbourhoods/Inclusive Economy. There are some additional recommendations as expansion to existing points (i.e. Inclusive economy, J1 and active frontages). None of the following points challenge or question the soundness and legal ground of local plan review. These are as follows:] - Improving conditions for walking, cycling and public transport, and service routes.		Comment noted. The Stratford Neighbourhood policies set out improvements for walking, cycling and public transport in the area, with Policy T4 considering the servicing and deliveries of development.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/116	Transport															No comment.		Comment noted.
Reg19-E-156	John Saunders		Reg19-E-156/002	Transport							Blank	Blank						Blank	<u>Cycling</u> Increase the number of cycle lanes. Make these more attractive and safer for cyclists, avoid wherever possible conflicts with pedestrians by means of clear signage. Standardise the lane width. Where appropriate, for safety reasons, give priority to cyclists over other vehicles. Ensure that drains and drain covers in cycle lanes are flush with the road surface. Prioritise the removal of pot holes in cycle lanes.		Comment noted. The Sustainable Transport Strategy sets out cycling improvements across the borough, including routes, priority and making them attractive. Specific improvements are undertaken by the Newham Highways team - such as the Romford Road and the Royal Docks Corridor schemes under construction.
Reg19-E-156	John Saunders		Reg19-E-156/003	Transport							Blank	Blank						Blank	<u>Stratford station</u> Reach agreement with TFL and other operators to maintain signage and services, including toilets, to the same standard as other London main stations.		Comment noted. The provision of toilets at Stratford station is a decision for Transport for London. Policy HS2 states that "Major developments within town and local centres should incorporate new, or contribute towards enhanced access to ... toilets and baby changing/nursing facilities."

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Reg19-E-190	Manor Park Business Association		Reg19-E-190/004	Transport															Provision for more parking along Romford Road would be most welcome, as many businesses feel that they suffer, due to the public not having sufficient parking to shop, at local stores. Much business is lost to Ilford and Stratford.		Comment noted. The borough has a low car ownership rate, with over half of residents not owning a car. Newham has a target of 83 per cent of all trips to be made on foot, by cycle or using public transport by 2041, set in the Mayor of London’s Transport Strategy. It is therefore not considered appropriate to encourage additional parking, with improvements to walking, cycling and public transport proposed along the Romford Road corridor.
Reg19-E-200	London City Airport		Reg19-E-200/058	General															[Annex 4 – London City Airport Background and Context] City Airport Development Programme In July 2016 planning permission was granted for the City Airport Development Programme (CADP1) which includes new passenger facilities and airfield infrastructure. It also allowed up to 6.5 million passengers per annum (mppa) and 111,000 air transport movements (ATMs) per year. Work on the new airfield infrastructure, including a parallel taxiway and 8 new aircraft stands was completed in 2020 with the airport investing more than £350m in new infrastructure by that time. However, due to the severe downturn in activity at the airport during the Covid-19 pandemic, the CADP works were paused. It is expected that the CADP development, including terminal extensions, will resume once traffic growth has recovered. In August of 2024, the Secretaries of State approved an appeal against Newham’s refusal of a S73 planning application seeking to raise the planning cap on the number of passengers from 6.5 million to 9 million passengers per annum, and allow three additional flights in the first half hour of operations on Mondays to Saturdays (6:30am-6:59am). An extension of operating hours on Saturday afternoons from 12:30pm to 6:30pm which was also sought by the airport was not approved. 17 This appeal decision supports the longer term vision of LCY which is detailed further in the 2020 Master Plan. As originally conceived by Government, an airport Master Plan is intended to set out indicative proposals for the future development of an airport and is intended to inform the local development plan framework, as well as other transport and economic planning processes.		Comment noted.

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Reg19-E-200	London City Airport		Reg19-E-200/059	General															[Annex 4 – London City Airport Background and Context] 2020 master plan The future development of LCY is guided by the 2020 master plan which sets out how the airport can respond to increasing demand to fly from LCY in a sustainable and responsible way. The master plan was produced, following detailed consultation, in line with Government guidance as set out in the Aviation Policy Framework National aviation policy sets out clear in-principle support for airport expansion where it allows airports to make best use of their existing runways (Beyond the Horizon The Future of UK Aviation: Making Best Use of Existing Runways (2018) and subsequently reiterated in Flightpath to the Future (2022) and reiterated in the Government’s Jet Zero Strategy (2022). The Government also makes clear that airports are strategically and nationally important assets, which enhance the UK’s global connectivity and act as catalysts for economic growth. In that context, the production of the 2020 master plan was intended to inform future revisions of the Newham Local Plan and other development plans including the London Plan, so that sustainable growth of the airport could be anticipated and provided for. Forecasts suggest that the airport could handle up to 11mppa annually accommodated on up to 151,000 ATMs per year. These forecasts are endorsed by Government which has allowed for growth beyond the current limits and up to the master plan assumptions in the modelling which underpins the Jet Zero Strategy. This long term growth is expected to: • Create of up to 5,300 local jobs and economic benefits to support the recovery of East London; • Establish a new onsite Aviation Centre of Excellence to create more highly skilled, good quality jobs and creating additional pathways into employment at the airport; • Add £210 million in annual economic output (GVA) through local employment opportunities; • Contribute up to £2 billion to the London and UK economy by the time 11mppa is reached; • Enhance connectivity with more flights to new destinations both nationally and internationally – supporting the wider London economy by providing strategy regional and international connectivity for business and tourism; and • Respond to increasing passenger demand in a sustainable and responsible way by managing environmental impacts and achieving net zero in line with our published targets		Comment noted.

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Reg19-C-004	Jack Dearlove		Reg19-C-004/001	General	N13 East Ham						Yes	Yes						Yes	N/A	No modifications. I mainly support the sentiment of the cycling provision suggested along the Barking Road.	Support noted.