

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-112	SEGRO	Gerald Eve	Reg19-E-112/015	Homes	H7 Housing for older people						Blank	No						Blank	SEGRO welcomes the additional text within this policy which sets out that a Sites Options Test is required to demonstrate the priority of SIL, LIL and LMUA in the first instance. SEGRO reiterates the representations made to the Regulation 18 version (part 4(b)) of the Local Plan <a href="#">[see Appended – Regulation 18 Draft Local Plan SEGRO response]</a> .		Support noted.

Inclusive Economy Comments to the [full Regulation 19 Representations](#)

[illegible]

Nevertheless, floorspace within Class E that serves a critical industrial function or is considered to have a significant impact on changing its use under Use Class MA permitted development right can be controlled and monitored. In appropriate circumstances, the Council will use planning conditions in the development management process to secure industrial floorspace permitted within Class E to restrict its use to those specifically consented within Class E.

However, the Council recognises the importance of ensuring the Plan is positively prepared, justified and effective, and has therefore made the following wording changes:

J1.2 Implementation:  
**All future developments incorporating office (E(g)(i)), research and development (E(g)(ii)) and/or light industrial (E(g)(iii)) floorspace within SILs, LILs, and where necessary and justified within site allocations identified for mixed use or employment-led development will be secured through conditions to limit uses consented within Class E, in order to achieve the objective of this policy.**

Further information on each spatial designation is available in the Employment Land Review (2022) (or subsequent updates) and applicants are expected to discuss their proposals with the council at the earliest opportunity to ensure that they align with the function, character and priority uses of their proposed location.

J3 Implementation (All):  
**Proposals incorporating the replacement and relocation of floorspace within office (E(g)(i)), research and development (E(g)(ii)) and/or light industrial (E(g)(iii)) will be secured through conditions to limit uses consented within Class E, under the following circumstances:**  
- the floorspace to be relocated or replaced is within a SIL or LIL; or  
- the replacement and relocated floorspace is within a SIL or LIL; or  
- the floorspace to be relocated or replaced is located within a site allocation and the relocation and replacement is considered necessary or justified.

Monitoring Framework - Key performance indicator 22:

Target no net loss of floorspace.

~~Monitor for location against designated employment land and non-designated employment sites.~~

~~Monitor approvals (gains and loss) and completions.~~  
**Monitor for net change in Use Class B (including general industrial (B2), storage or distribution (B8) (including dark kitchen/ shop and micro fulfilment)), industrial-related Use Class E (including research and development (E(g)(ii)) and light industrial (E(g)(iii))) and office (E(g)(i)) floorspace approved (gains and loss) and completed on Strategic Industrial Locations (SILs), Local Industrial Locations (LILs), site**

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																					<b>allocations and other non-designated employment sites.</b>  which are included in the modification table.  This comment has been subject to further discussion with the GLA. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report.
Reg19-E-024	Home Builders Federation		Reg19-E-024/011	Inclusive Economy	J1 Employment and growth			J1.1				No			No				J1: Employment and growth  The policy is unsound because it is ineffective.  It is unclear from Part 1 if the Council is expecting applicants for residential schemes to provide employment space. This should be clarified.		A change to this policy approach has not been made. We did not consider this change to be necessary as this policy is effective and clearly identifies which employment sites are suitable for co-locate with residential floorspace. Detail requirements on ow a site should be designed and developed comprehensively are set out in Local Plan Policy BFN2.
Reg19-E-024	Home Builders Federation		Reg19-E-024/012	Inclusive Economy	J1 Employment and growth							No				No			Restricting residential development from Local Industrial Locations and in some Local Mixed-Use Areas is unsound because it is contrary to the London Plan.  We can appreciate the desire to protect Strategic Industrial Locations. However, preventing mixed-use development (employment and residential) in these other locations is too restricting and contrary to the London Plan.  Paragraph 6.4.8 of the London Plan, supporting Policy E4, encourages the London boroughs to consider the potential for the release of industrial land for alternative uses if demand cannot support industrial uses in these locations. London Plan Policy E7 – Industrial intensification, co-location and substitution – at Part B, does allow for intensification of uses, to accommodate, among other things, residential development, subject to the criteria in Part D of the policy being met. While we are sure that the Council has made the necessary assessments as part of preparing this plan to support restricting residential development in most of these locations (for example, paragraph 3.156), it is possible that circumstances could change over the lifetime of the plan, and opportunities for co-location made present themselves. Consequently, we consider it would be sensible to allow for the possibility of co-location of uses in the local plan policy, subject to justification. Table 7 rules against residential development. Table 8 rules against residential development in some cases. We recommend that this is changed from ‘No residential floorspace is permitted’ to ‘employment-led co-location with residential development will be considered’.	Table 7 rules against residential development. Table 8 rules against residential development in some cases. We recommend that this is changed from ‘No residential floorspace is permitted’ to ‘employment-led co-location with residential development will be considered’.	A change to this policy approach has not been made. We did not consider this change to be necessary as the National Planning Policy Framework and London Plan requires boroughs to assess their local need for employment land and make sufficient provision. The Employment Land Review 2022 has been undertaken and indicates that the pipeline supply of industrial land is not sufficient to meet need. The Employment Land Review also highlights Newham’s important strategic role as a key industrial property market area and in close proximity to the Central Activity Zone. As such, the Local Plan goes further than the London Plan position to protect industrial land and industrial development in both SILs and LILs have to take the form of intensification to deliver further industrial floorspace and not to release land for the delivery of, or co-location with, residential. Local Mixed Use Areas are assessed through the Employment Land Review which inform which sites are suitable for co-location and which do not. LUMAs that do not allow for residential floorspace consists of existing employment uses which are functioning well and should be protected in case of redevelopment. The GLA does not raise any concern on the approach to restrict residential uses in some of the Local Mixed Use Areas (see their representations).

Inclusive Economy Comments to the <a href="#">full Regulation 19 Representations</a>																												
Reg19-E-027	B&Q Limited	RPS	Reg19-E-027/005	Inclusive Economy	J1 Employment and growth			J1.2b									Blank	No	No	No	No	No			Blank	<p>Policy HS3: Edge-of-Centre and Out-of-Centre retail, restaurants, cafes and services part 1 supports the ‘full loss’ of floorspace in retail (E(a)), restaurant (Eb) and services (Ec) use in edge and out of centre locations except in the case of certain small ‘corner plot’ convenience stores.</p> <p>The written justification at paragraph 3.91 states that redevelopment of sites in edge of centre and out of centre locations towards residential uses will benefit nearby town and local centres by helping concentrate investment in centres, where business clustering will provide additional benefits, and an increase in footfall from new residential development.</p> <p>Implementation Text for HS3.1 states that aside from the corner plot convenience stores, the town centre first principles of the NPPF apply and loss of retail (Ea), restaurants and cafes (Eb) and service (Ec) uses in undesignated areas will be supported.</p> <p>Dependent on the delivery of a new DLR route and station, Gallions Reach shopping centre is to be reconfigured into a modern district centre. In the interim it will be managed as an out of centre facility.</p> <p>The loss of other out of centre retail parks that are not covered by a site allocation should lead to either additional industrial floorspace as per Local Plan Policy J1 or the residential development opportunity of the site should be optimised in line with Local Plan Policy D3.</p> <p>We consider this policy approach has not been positively prepared, is unjustified in accordance with the spatial strategy of the plan and is not consistent with national policy.</p> <p>[Background</p> <p>B&amp;Q Limited is part of Kingfisher plc. an international home improvement company with over 2,000 stores operating across eight countries within Europe and the United Kingdom. B&amp;Q occupies a store in Newham situated on the Gateway Retail Park (part of the Beckton Triangel) in Claps Gate Lane Beckton and has been present on the site since 1996.</p> <p>The store serves the whole of Newham including neighbouring areas of east and south-east London. It is a ‘bulky goods’ outlet selling building and garden products, fitted kitchens and bathrooms and furniture and furnishings. The product range is complementary to the type of products sold in town centres, requiring large floor areas for shopfloor storage and display and adjacent car parking for the transport of materials away, often by van.</p> <p>It makes a valuable contribution to the local economy both in terms of employment and the service it provides</p>		<p>The objective of the Local Plan, through the site allocation and policies HS1 and HS2, are to provide a framework for protecting the vitality and viability of existing town and local centres in Newham, and for the creation of new ones where supported by the evidence base and the Integrated Impact Assessment supporting the Plan. Policy HS3 complements these policies by promoting consolidation of retail, leisure and services in centres, unless the evidence base justifies a different approach.</p> <p>The Retail and Leisure Study (2022) recognises the existing role of Beckton's retail parks in serving retail needs in the borough, particularly for bulky goods comparison retail, and recommends that opportunities to reconfigure, redevelop, reposition etc should be considered as part of a wider development, in line with the NPPF and London Plan policy SD7. Commercial operator demand across the retail parks and out-of-centre retailing should inform planning applications.</p> <p>The positive approach to the asset management of existing out of centre retail parks is evident from development management planning history, where the Council has generally approved applications that demonstrate they do not lead to an increase in the intensity of the use on site (e.g. internal alterations, or facade amendments), that are not speculative in nature, and that pass the necessary sequential and/or impact tests. Nevertheless, these locations remain an out of centre retail and leisure destination, which the Council must continue to manage in a way which protects the vitality and viability of Newham’s existing town centres and its other retail and leisure commitments, in line with the NPPF and the London Plan.</p> <p>However, the Council recognises the importance of ensuring the Plan is clear in its intended application of policy for the management of out of centre retail parks, and has therefore drafted the following modification to policy HS3.1 implementation, which will be presented to the Inspector for their consideration:</p> <p>HS3.1 implementation: Elsewhere, the town centre first principles of the NPPF apply and loss of retail (Ea), restaurants and cafes (Eb) and service (Ec) uses in undesignated areas will be supported. For sites in out of centre retail parks that are not covered by a site allocation, the loss should lead to additional industrial floorspace as per Local Plan Policy J1. In most other instances, residential development opportunity of the site should be optimised in line with Local Plan Policy D3, unless directed otherwise by policies in this Plan. <b>While the council supports the loss of retail and leisure in out of centre locations towards other uses compatible with the spatial strategy of the Local Plan, the Council also recognises that established retail parks in the Beckton area help to meet existing, often specialist retail needs. The Council may accept proposals for the asset management of existing retail parks that meet relevant quality criteria set out in this Plan and that:</b></p> <ul style="list-style-type: none"><li>• <b>Demonstrate optimisation of the existing</b></li></ul>

																		<p>to local residents and businesses. The store directly employs 153 staff (63 full-time and 90 part-time), is an established part of the local retail market is also a supplier to local tradespersons and businesses.</p> <p>The store also plays an active role in the local community, both economically and socially. It actively supports the corporate charity, Shelter, and raises money for the B&amp;Q Foundation. There is also more localised support through Neighbourly, such as the donation of building materials to local charities. ]</p> <p>Evidence Base</p> <p>The London Borough of Newham, Retail &amp; Leisure Study 2022 examined the pattern of retailing in the borough and the quantitative and qualitative need for new retail floorspace.</p> <p>It examines the market shares of the three retail parks in the borough, noting that Gallions Reach Shopping Park is the most popular but that both Beckton Triangle and Becton Retail Park are popular destinations with Newham residents. In addition, the ‘Beckton area’ including East Beckton District Centre and the retail parks is a significant attractor of expenditure into the borough with a combined turnover of £208.5m in 2022). It identifies Stratford and Beckton as the dominant destinations for comparison goods expenditure, attracting the largest share of trade in the borough.</p> <p>The assessment of comparisons goods floorspace need (paras 12.68 et seq) identifies a need for additional floorspace across the borough of between 1549 sq m – 21,888 sq m by depending upon population growth. Geographically, this need arises predominantly within the Stratford and Beckton areas; driven by the already strong market share alongside strong forecast population growth (p.113).</p> <p>This requirement is translated into the draft plan a s a requirement for all retail floorspace of 25,973sq m (para 3.1) with development directed to the borough’s network of Metropolitan, Major, District and Local Centres, the new district centre allocated at Beckton Riverside (subject to the delivery of a new DLR route and station) and the identified new and expanded local centres.</p> <p>There are no new sites allocated for retail development of a scale comparable with a large DIY store.</p> <p>Objection to Policy</p> <p>The plan’s retail strategy is built upon the findings of the London Borough of Newham, Retail &amp; Leisure Study 2022. This acknowledges the contribution of the existing out of centre retail facilities towards meeting the shopping needs of the borough’s residents, and their impact on shopping patterns through the levels of expenditure they draw into the</p>	<p>built form (e.g. through introduction of a mezzanine or other internal alterations) for the benefit of specific occupier(s); and</p> <ul style="list-style-type: none"><li>• Pass relevant retail and/or leisure sequential and impact tests set out in this policy, which take into consideration the vitality and viability of all town centres that may be affected, any local centre from Newham’s network of centres which are within 15min walking distance of the site, and relevant retail and/or leisure permissions.</li></ul>
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																			borough.  The calculation of the comparison goods floorspace requirement for the plan period is predicated upon the retention and continued operation of these facilities. The evidence base does not support the approach of the plan which treats existing out of centre retail parks as reservoirs of development land to be developed for other purposes without any consideration as to how their loss would impact on shopping patterns or the need to reallocate additional land for retail development to replace that lost.		
Reg19-E-033	Thames Water		Reg19-E-033/025	Inclusive Economy	J1 Employment and growth			J1.2a			Blank	Yes						Blank	Thames Water support the continued allocation of Beckton Sewage Treatment Works (STW) within the Beckton Riverside Strategic Industrial Location (SIL 5) where the ‘priority uses’ are for large scale industrial with a focus on, amongst other things, utilities infrastructure.		Support noted.
Reg19-E-091	IQL Office LP	Quod	Reg19-E-091/019	Inclusive Economy	J1 Employment and growth						Blank							Blank	We support the amendment to the policy in Table 10 to state that Office-related research and development (E(g)(ii)) floorspace is acceptable in Stratford Metropolitan Centre.  Changes in the commercial office market since the pandemic have seen a change in the way offices are used and a need for flexibility of floorspace and a wider range of uses instead of large single tenanted offices.  Therefore, allowing research and development use will support the growth of employment opportunities in the Metropolitan Centre and opportunities to work with the growing further education hub in the Stratford area.		Support noted.
Reg19-E-096	Redefine Hotels Portfolio IV Ltd	Savills	Reg19-E-096/039	Inclusive Economy	J1 Employment and growth			Table 10				No			No					An additional bullet should be added in relation to Major and District Centres to state: <b>“Employment-generating main town centre uses (as defined by the NPPF), the type and quantity consistent with the town centre designation set out under Policies HS1 and HS2”.</b>	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a wording change to Policy J1 to cross reference Policy HS1. The Council’s response has not changed.



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Reg19-E-096	Redefine Hotels Portfolio IV Ltd	Savills	Reg19-E-096/040	Inclusive Economy	J1 Employment and growth							No			No					New employment floorspace should be directed to, and delivered in accordance with the following spatial strategy and functional requirements and the design and delivery principles outlined in Local Plan Policy J2: The development of a range of employment- <b>generating</b> floorspace (office (E(g)(i)), research and development (E(g)(ii)), light industrial (E(g)(iii)), general industrial (B2) and storage or distribution (B8) <b>and main town centre uses</b> ) to support the growth of new economic sectors, is supported on site allocations identified for mixed-use or employment-led development, where the delivered floorspace is in conformity with the development principles set out in the site allocations	This wording change is not supported. We did not consider this change to be necessary as the use of 'employment -generating floorspace' is not consistent with the terminology in the Plan. The Council considers the policy to be effective as main town centre uses are included as part of the development principle of relevant site allocations as informed by evidenced needs and this policy explicitly required development to deliver floorspace in conformity with the development principles set out in the site allocations.
Reg19-E-100	Simpson and Goldstein	Lichfields	Reg19-E-100/001	Inclusive Economy	J1 Employment and growth			LMUA6			Yes	No						Yes	We write on behalf of our clients, Simpson and Goldstein ('S&G') in response to the above consultation. S&G have an active interest in Land at Ashburton Terrace, Plaistow, E13 0BA (the 'Site'), which is designated in the London Borough of Newham's (LBN) draft Submission Local Plan (June 2024) (Reg 19) under draft policy J1 (Employment and growth) (Site ref LMUA6, Ashburton Terrace) for ancemployment-led development. S&G therefore welcome the opportunity to engage with LBN on the draft Regulation 19 Local Plan.		Comment noted.



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Reg19-E-100	Simpson and Goldstein	Lichfields	Reg19-E-100/004	Inclusive Economy	J1 Employment and growth			LMUA6			Yes	No						Yes	<p>Site Designation</p> <p>The Site continues to be designated under J1: Employment and growth through Site reference LMUA6, Ashburton Terrace. The policy is largely unchanged from the Regulation 18 version and continues to support the provision of employment led development through light industrial, storage and distribution, small scale office, workspaces for Small and Medium Enterprises and start-ups and local supply chains requiring yard space (Class E(g)(i-iii)). Policy J1 continues to support the provision of co-location with residential development, subject to Policy J2: New employment floorspace. Policy J2 identifies that:</p> <p>“Co-location with residential development is only supported in the specific Local Mixed Use Areas... where:’</p> <p>a The development remains employment led in LMUAs, MBOAs and site allocations identified for employment-led development; and</p> <p>b a suitable co-location design can be accommodated which maintains the function and viability of the priority uses on site and the amenity of the residential accommodation; and</p> <p>c a suitable and robust Relocation Strategy for any existing uses that cannot be incorporated within the redevelopment is provided in accordance with Local Plan Policies J3.2 ad J3.3.”</p>		Comment noted.
Reg19-E-100	Simpson and Goldstein	Lichfields	Reg19-E-100/011	Inclusive Economy	J1 Employment and growth			Table 6			Yes	No						Yes	<p>Employment Use</p> <p>As noted above, the draft designation continues to include a range of priority employment uses for the Site, informed by the Employment Land Review (2022), and these are unchanged from the Regulation 18 draft plan. While these are priority uses, it is critical that the policy promotes viable and deliverable employment uses in such areas alongside much needed residential and quasi-residential uses. Providing an applicant has satisfactorily demonstrated that a scheme is delivering an appropriate quantum and range of viable employment uses alongside housing residential (or quasi-residential accommodation) this should satisfy the policy.</p>		This wording change is not supported. We did not consider this change to be necessary as the current wording in Policy J1 and the Glossary clearly outline the requirements for employment-led developments to first meet employment needs, with other uses to be incorporated around it. This site is designated for the protection of its employment function, with a variety of existing employment uses and the potential for industrial intensification in form of small, stacked industrial unites in the future as informed by the Employment Land Review (2022). The opportunity for delivering mixed use and residential use at this site in form of employment-led development is recognised and supported in the Plan. The Council is satisfied that the Plan remains sound without the proposed changes.

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Reg19-E-100	Simpson and Goldstein	Lichfields	Reg19-E-100/012	Inclusive Economy	J1 Employment and growth			LMUA6			Yes	No						Yes	<p>We also note that the supporting text to policy J1 states that Local Mixed Use Areas are employment-led designations. This applies to the draft policy designation. Additionally, ‘employment-led’ has been added to the functional requirements column in Table 8 for designation LMUA6. We recognise the aims of the supporting text and Table 8, and we support the flexibility afforded to establishing the optimum quantity and format of employment space alongside housing uses. However, the Local Plan must be very clear that employment-led does not mean that employment floorspace has to be a higher quantum than the residential floorspace. This is addressed under ‘Implementation’ at p.191 which confirms that employment-led means addressing employment requirements first in a mixed use scheme’s design, before addressing the residential element, and it therefore is unrelated to the proportionate quantum of employment and ‘other’ uses.</p> <p>At the Ashburton Terrace site itself, for example, through detailed pre-application discussions and engagement with prospective tenants, it has been established that a smaller proportion of the Site is required to be employment floorspace (relative to the LSPBSL component) to meet market demand, because the quality of the proposed employment space will lead to a higher number of jobs at the Site. Furthermore, solely affordable workspace is proposed which will provide significant public benefits.</p>	However, this should be clearly expressed in the policy itself.	This wording change is not supported. We did not consider this change to be necessary as the current wording in Policy J1 and the Glossary clearly outline the requirements for employment-led developments to first meet employment needs, with other uses to be incorporated around it. This site is designated for the protection of its employment function, with a variety of existing employment uses and the potential for industrial intensification in form of small, stacked industrial unites in the future as informed by the Employment Land Review (2022). The opportunity for delivering mixed use and residential use at this site in form of employment-led development is recognised and supported in the Plan. The Council is satisfied that the Plan remains sound without the proposed changes.
Reg19-E-102	Network Rail		Reg19-E-102/015	Inclusive Economy	J1 Employment and growth			SIL6			Blank							Blank	<p>[Outlined below are our comments pertaining to the soundness of the Council’s Regulation 19 Local Plan in relation to Bow Goods Yard.]</p> <p><u>Employment</u></p> <p>Bow Goods Yard is identified within Table 6 of Policy J1 as Strategic Industrial Land which has a priority use for safeguarded rail heads, large-scale industrial freight distribution and small-scale light industrial uses. Network Rail support the need to deliver diverse, inclusive and green economic growth to contribute to meeting the boroughs office and industrial needs.</p>		Support noted.
Reg19-E-112	SEGRO	Gerald Eve	Reg19-E-112/016a	Inclusive Economy	J1 Employment and growth			J1.2											SEGRO reiterates the representations made to the Regulation 18 version (part 5(a)) of the Local Plan [see <b>Appended – Regulation 18 Draft Local Plan SEGRO response</b> ] which supports the spatial approach to new employment floorspace in part 2 of the draft policy [and reference to SIL2 and SIL6 and LIL7. ]		Support noted.

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Reg19-E-112	SEGRO	Gerald Eve	Reg19-E-112/016b	Inclusive Economy	J1 Employment and growth			SIL2											SEGRO reiterates the representations made to the Regulation 18 version (part 5(a)) of the Local Plan [see <b>Appended – Regulation 18 Draft Local Plan SEGRO response</b> ] which supports the spatial approach to new employment floorspace in part 2 of the draft policy and reference to SIL2 [and SIL6 and LIL7. ]		Support noted.
Reg19-E-112	SEGRO	Gerald Eve	Reg19-E-112/016c	Inclusive Economy	J1 Employment and growth			SIL6											SEGRO reiterates the representations made to the Regulation 18 version (part 5(a)) of the Local Plan [see <b>Appended – Regulation 18 Draft Local Plan SEGRO response</b> ] which supports the spatial approach to new employment floorspace in part 2 of the draft policy and reference to [SIL2 and] SIL6 [and LIL7]		Support noted.
Reg19-E-112	SEGRO	Gerald Eve	Reg19-E-112/016d	Inclusive Economy	J1 Employment and growth			LIL7											SEGRO reiterates the representations made to the Regulation 18 version (part 5(a)) of the Local Plan [see <b>Appended – Regulation 18 Draft Local Plan SEGRO response</b> ] which supports the spatial approach to new employment floorspace in part 2 of the draft policy and reference to [SIL2 and SIL6 and] LIL7		Support noted.
Reg19-E-112	SEGRO	Gerald Eve	Reg19-E-112/017	Inclusive Economy	J1 Employment and growth						Blank	No						Blank	SEGRO also reiterates previous presentations made in relation to Table 12 [see <b>Appended – Regulation 18 Draft Local Plan SEGRO response</b> ].		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council's response has not changed.

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Reg19 -E-169	Silvertown Homes Ltd	DP9	Reg19-E-169/006	Inclusive Economy	J1 Employment and growth			SIL3			Blank	No			No			Blank	<p>Policy J1 ‘Employment and Growth’</p> <p>SHL submitted representations in response to the Regulation 18 Local Plan consultation objecting to Policy J1 ‘Employment and Growth’ on the basis that 1) the Reg 18 Local Plan did not include a plan that clearly showed the location and extent of Strategic Industrial Land (‘SIL’) and 2) ‘Thameside West SIL 3’ states that “no residential floorspace is permitted in these designations” even though the land designated within ‘Thameside West SIL 3’ currently benefits from an implemented planning permission (ref: 18/03557/OUT) which includes new homes in both the detailed and outline phases.</p> <p>Policy J1 is therefore in direct conflict with the Hybrid Planning Permission. This misalignment brings into question whether the Local Plan meets the ‘effective’ test of soundness in terms of assumptions about housing delivery the protection of industrial floorspace.</p> <p>The Council have now provided a plan to show the location of SIL sites however they have not amended the SIL designation for Thameside West in recognition of the extant planning permissionthat permits the delivery of new homes.</p> <p>Conclusion and Next Steps</p> <p>SHL have significant concerns about the misalignment between the Thameside West Site Allocation and the Hybrid Planning Permission with respect to [building heights and] the SIL designation.</p> <p>[The building height parameters stated in the Site Allocation text and Policy D4 are significantly lower than what has been approved under the Hybrid Planning Permission and therefore would not be able to accommodate the approved quantum of homes upon which the Councils housing supply projections are predicated.] Similarly, Policy J1 designates part of the Thameside West Site Allocation as SIL where residential development is not permitted, contrary to the Hybrid Planning Permission, which is now implemented.</p>	To remedy this ‘Thameside West SIL 3’ should be removed from the Map of Newham’s Employment Designations’ (page 188) and Table 6 ‘Strategic Industrial Locations’ in recognition of the fact that the Site benefits from an implemented planning permission for residential led mixed use development. The strategic industrial designation [and local centre opportunity designation] should also be removed from the Site Allocation Map to align with the Hybrid Planning Permission.	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council’s response has not changed.

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Reg19-E-176	Port of London Authority	Capita	Reg19-E-176/004	Inclusive Economy	J1 Employment and growth						Blank	Blank						Blank	<p>Safeguarded Wharves</p> <p>It is recommended that the Key Diagram on page 21 is updated to specifically include the boroughs safeguarded wharves at Thames Refinery, Peruvian and Royal Primrose wharves to clearly identify the location of these important assets. It is also essential that the Local Plan specifically sets out that these are safeguarded via 2021 Secretary of State Ministerial Direction and supported by policy SI15 (Water Transport) of the Mayors London Plan (2021). Reference to the safeguarding directions isn't made until the supporting text, justification of T1:Strategic Transport (Page 321). Within the Local Plan it is recommended that this wording is [included to support the Key Diagram and] included in policy J1 (Employment and Growth) to highlight their safeguarded status.</p>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the Plan as currently drafted does effectively identify and safeguard the Safeguarded Wharves in line with National Policy and London Plan requirements. The safeguarded wharves are included on our policies map, which provides a more detailed representation of our policy requirements and designations. They are also within identified employment areas on the key diagram, which is consistent with the level of detail provided on this diagram, which is primarily designed to illustrate our spatial ambitions, rather than land use designations. Reference is already made to the safeguarded wharves in Policy J1, with reference made to priority employment uses for these wharves. The Council is satisfied that the plan is sound without the proposed changes.</p>
Reg19-E-178	Royal Docks		Reg19-E-178/027	Inclusive Economy	J1 Employment and growth			SIL3			Blank	Blank						Blank	<p>[The comments below and in the attached schedule set out some areas where we feel amendments or additions to the Plan could further support the Council and the RDT's work. In the attached schedule are a series of specific changes which we have organised with reference to the pages and policies of the draft.]</p> <p><u>Detailed Comments Schedule:</u> The SIL allocation on the Policies Map is incorrect as the SIL allocation has been relocated as part of the Thameside West planning permission (now implemented).</p>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as while we acknowledge that the site is subject to this planning permission (which can still be built out), the permission does not alter the SIL boundary. Given that the proposed replacement of employment floorspace, as permitted, is not the most preferable option for retaining SIL capacity in full, and considering that the scheme has not yet commenced, the site continues to be designated as a Strategic Industrial Location for industrial intensification. This designation aims to address the borough's significant need for industrial floorspace as identified in the Employment Land Review. Release of the SIL boundary would be harmful to the supply of SIL and employment land across Newham.</p> <p>For detailed evidence, please refer to the Proposed New Employment Land Designations and Boundary Amendments document.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>
Reg19-E-178	Royal Docks		Reg19-E-178/028	Inclusive Economy	J1 Employment and growth						Blank	Blank						Blank	<p>[The comments below and in the attached schedule set out some areas where we feel amendments or additions to the Plan could further support the Council and the RDT's work. In the attached schedule are a series of specific changes which we have organised with reference to the pages and policies of the draft.]</p> <p>Detailed Comments Schedule: Consideration should be given to including creative and cultural uses in the definition of the policy to ensure that the aspirations for cultural growth can be achieved.</p>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the definition of Cultural and Creative Industry/Production is included in the Glossary and Abbreviations section in the Plan. The Council is satisfied that the plan remains 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
Reg19-E-178	Royal Docks		Reg19-E-178/030	Inclusive Economy	J1 Employment and growth			LMUA1			Blank	Blank						Blank	<p>[The comments below and in the attached schedule set out some areas where we feel amendments or additions to the Plan could further support the Council and the RDT's work. In the attached schedule are a series of specific changes which we have organised with reference to the pages and policies of the draft.]</p> <p>Detailed Comments Schedule: LMUA1 (Silvertown Arches) uses should be expanded to include Visitor Accommodation in line with HS8 but should not exclude Residential Floorspace as this may be critical to supporting a viable masterplan.</p>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as no co-location is permitted at this site since the established and future commercial uses of the site will lead to increase of employment uses according to the assessment in the Employment Land Review 2022. Policy HS8 directs visitor accommodation to town and local centres principally within Stratford and Maryland neighbourhood and in proximity to Excel conference centre. Visitor accommodation at out of centre location should meet relevant requirements in Policy HS8 including the submission of market demand testing, a Sequential Test and a Visitor Accommodation Management Plan. The Council is satisfied that the plan remains sound without the proposed changes.</p>
Reg19-E-178	Royal Docks		Reg19-E-178/031	Inclusive Economy	J1 Employment and growth			SIL3			Blank	Blank						Blank	<p>[The comments below and in the attached schedule set out some areas where we feel amendments or additions to the Plan could further support the Council and the RDT's work. In the attached schedule are a series of specific changes which we have organised with reference to the pages and policies of the draft.]</p> <p><u>Detailed Comments Schedule:</u> The map incorrectly marks the SIL designation on Thameside West which has been relocated as part of the now implemented Thameside West planning consent.</p>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as while we acknowledge that the site is subject to this planning permission (which can still be built out), the permission does not alter the SIL boundary. Given that the proposed replacement of employment floorspace, as permitted, is not the most preferable option for retaining SIL capacity in full, and considering that the scheme has not yet commenced, the site continues to be designated as a Strategic Industrial Location for industrial intensification. This designation aims to address the borough's significant need for industrial floorspace as identified in the Employment Land Review. Release of the SIL boundary would be harmful to the supply of SIL and employment land across Newham.</p> <p>For detailed evidence, please refer to the Proposed New Employment Land Designations and Boundary Amendments document.</p> <p>The Council is satisfied that the plan is/remains sound without the proposed changes.</p>

Reg19 -E-179	AIM Land Ltd	Rolfe Judd	Reg19-E- 179/001	Inclusive Economy	J1 Employment and growth			LIL10			Blank	No				No	Blank	<p>Grantham Road Local Industrial Location (LIL) Designation</p> <p>The site was designated as a Local Industrial Location (LIL) in the 2018 Local Plan, despite it having no recognised industrial floorspace on site. It had no such designation in previous iterations of the Development Plan. The designation also highlights that the site has scope for ‘managed intensification’.</p> <p>[Image attached of Extract from Newham Local Plan Proposals Map (2018)]</p> <p>Policy J2 (Providing for Efficient Use of Employment Land) of the current Newham Local Plan outlines the strategic aims and policies for designated employment sites – it states:</p> <p>‘5. Strategic Industrial Locations (SIL) and Local Industrial Locations (LIL) as listed in Table 7 are designated for protection, Managed Intensification, (as per criteria in J2.3b) and suitable in principle for Use Classes B1(b) B1(c) B2, B8 and appropriate Sui Generis employment uses including waste, utilities and transport depots, with other supporting facilities including B1a uses, where ancillary in scale and function’.</p> <p>Following the site’s designation as a LIL, the site was subject to an outline planning consent which addressed the southern third of the site:</p> <p>19/03343/OUT [Hyperlink to <a href="https://pa.newham.gov.uk/online-applications/applicationDetails.do?keyVal=Q1RSTZJYIOY00&amp;activeTab=summary">https://pa.newham.gov.uk/online-applications/applicationDetails.do?keyVal=Q1RSTZJYIOY00&amp;activeTab=summary</a>]</p> <p>Outline planning application for the erection of a self-storage warehouse (Class B8) and associated car parking, with all matters reserved except for layout, scale and access</p> <p>Approved 19/02/2024</p> <p>This portion of the site was a 4,500sqm sui generis car park use which did not directly contribute toward the function of the LIL. The proposed Class B8 storage use more than triples the amount of floorspace on site to 13,674sqm, but importantly, the use brings a recognised industrial use onto LIL land. The reserved matters for this outline permission are partially completed and the remaining application will be finalised and approved over the coming months.</p> <p>The remainder of the site to the north comprises a gym (Class E use) and a car hire centre (sui generis). None of these uses are sought after or protected within the LIL designation.</p> <p>Managed Intensification of Industrial Space under current and draft policy</p> <p>Policy J2 of the current Local Plan goes states that one of its strategic principles is to:</p> <p>5. ‘Achieve [more] efficient use of employment land to support economic growth sectors and wider growth needs through the retention of suitable locations and capacity, intensification</p>	<p>The draft policy should therefore be amended to reflect the London Plan policy position as a minimum but preferably the Council should release the norther section of the site from its LIL designation and recognise that the LIL as a whole has been intensified significantly and that the remainder of the site has no prospect of coming back into industrial use in the short term (as stated by the Council’s Employment Land Review 2022) or the long-term due to the very limited developable footprint. We therefore implore the Council to remove the site from the LIL designation so that a more suitable and beneficial use like co-living or residential development come forward.</p> <p>Please refer to the appended representations for full details.</p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the site is currently occupied by light industrial businesses and provides an opportunity for site intensification through the delivery of small to medium scale warehousing units within the LIL boundary. While the permitted industrial uses at the southern part of the site are not yet fully completed, the designation of the site as a Local Industrial Location remains appropriate to support industrial intensification and address the borough’s significant need for industrial floorspace as identified in the Employment Land Review 2022. Release of the LIL boundary or allowing co-location at this location would be harmful to the supply of LIL and employment land across Newham.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>
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																			<p>site also has a significantly restricted developable area. Figure 49 of the accompanying document from Rolfe Judd Architecture demonstrates that the site has a complex network of important utilities that run through various parts of the site. The utilities include High, Medium and Low Pressure Gas Pipes, a High Pressure Water Pipe below ground and High Voltage Electricity Pylons which run above the site adjacent to the Motorway. All utilities have easements which restrict the developable area to the area shown in white on the top half of the image below.</p> <p>[Image showing Plan Showing Utilities running through the site]</p> <p>Alterations to a limited number of the existing services would increase developable area. However, it is a very costly exercise only enabled through efficient redevelopment of the site, thereby requiring the resulting development to offer appropriate viability. The Employment Land Review 2022 fails to acknowledge any of these factors when assessing the suitability of the site as a LIL which is a fundamentally flawed approach and emphasises the “hope value” that has been assigned to the site redevelopment as an industrial use.</p> <p>The map above and in the attached document clearly outlines that the application has a very limited developable footprint due to these constraints which do not allow for the development of viable industrial buildings and servicing roads. The only way to viably increase the density on site is the increase the height of the proposed buildings and provide a non-industrial use on these upper floors such as residential, student or co-living. The current policy position would allow the removal of the current non-industrial uses on site and their replacement with a residential alternative due to the managed intensification that has already occurred on site, whereas the draft wording of the Policy J2 completely removes the ability for residential development or co-location on this site which is completely contrary to London Plan Policy E7.</p> <p>Please refer to the appended representations for full details.</p> <p>The application site has a very limited developable footprint due to these constraints which do not allow for the development of viable industrial buildings and servicing roads. The only way to viably increase the density on site is the increase the height of the proposed buildings and provide a non-industrial use on these upper floors such as residential, student or co-living. The current policy position would allow the removal of the current non-industrial uses on site and their replacement with a residential alternative due to the managed intensification that has already occurred on site, whereas the draft wording of the Policy J2 completely</p>		
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																			removes the ability for residential development or co-location on this site which is completely contrary to London Plan Policy E7.		
Reg19-E-179	AIM Land Ltd	Rolfe Judd	Reg19-E-179/009	Inclusive Economy	J1 Employment and growth			LIL10			Blank	No					No	Blank	[Our client acknowledges that their site falls within the proposed Grantham Road Local Industrial Location (LIL) and proposed Neighbourhood N16 (Manor Park and Little Ilford). We also note that Draft Local Plan Policy D4 has identified several areas in which are suitable for tall buildings, and this does not include our applicant's site. We therefore seek to amend the designation to ensure its inclusion in a 'Tall Buildings Zone', amendments to the wording of Draft Policy D4], de-designation of the site as an LIL and amendments to the wording of Policy J1 and J2.		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the site is currently occupied by light industrial businesses and provides an opportunity for site intensification through the delivery of small to medium scale warehousing units within the LIL boundary. While the permitted industrial uses at the southern part of the site are not yet fully completed, the designation of the site as a Local Industrial Location remains appropriate to support industrial intensification and address the borough's significant need for industrial floorspace as identified in the Employment Land Review 2022. Release of the LIL boundary or allowing co-location at this location would be harmful to the supply of LIL and employment land across Newham.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>

Reg19 -E-179	AIM Land Ltd	Rolfe Judd	Reg19-E- 179/011	Inclusive Economy	J1 Employment and growth			LIL10			Blank	No				No	Blank	<p>Representations on the Draft Local Plan Document</p> <p>Grantham Road Local Industrial Location (LIL) Designation</p> <p>The site was designated as a Local Industrial Location (LIL) in the 2018 Local Plan, despite it having no recognised industrial floorspace on site. It had no such designation in previous iterations of the Development Plan. The designation also highlights that the site has scope for ‘managed intensification’.</p> <p>[Image inserted - Extract from Newham Local Plan Proposals Map (2018)]</p> <p>Policy J2 (Providing for Efficient Use of Employment Land) of the current Newham Local Plan outlines the strategic aims and policies for designated employment sites – it states:</p> <p>‘5. Strategic Industrial Locations (SIL) and Local Industrial Locations (LIL) as listed in Table 7 are designated for protection, Managed Intensification, (as per criteria in J2.3b) and suitable in principle for Use Classes B1(b) B1(c) B2, B8 and appropriate Sui Generis employment uses including waste, utilities and transport depots, with other supporting facilities including B1a uses, where ancillary in scale and function’.</p> <p>Following the site’s designation as a LIL, the site was subject to an outline planning consent which addressed the southern third of the site:</p> <p>19/03343/OUT [Hyperlink to <a href="https://pa.newham.gov.uk/online-applications/applicationDetails.do?keyVal=Q1RSTZJYIOY00&amp;activeTab=summary">https://pa.newham.gov.uk/online-applications/applicationDetails.do?keyVal=Q1RSTZJYIOY00&amp;activeTab=summary</a>]</p> <p>Outline planning application for the erection of a self-storage warehouse (Class B8) and associated car parking, with all matters reserved except for layout, scale and access</p> <p>Approved 19/02/2024</p> <p>This portion of the site was a 4,500sqm sui generis car park use which did not directly contribute toward the function of the LIL. The proposed Class B8 storage use more than triples the amount of floorspace on site to 13,674sqm, but importantly, the use brings a recognised industrial use onto LIL land. The reserved matters for this outline permission are partially completed and the remaining application will be finalised and approved over the coming months.</p> <p>The remainder of the site to the north comprises a gym (Class E use) and a car hire centre (sui generis). None of these uses are sought after or protected within the LIL designation.</p> <p><u>Managed Intensification of Industrial Space under current and draft policy</u></p> <p>Policy J2 of the current Local Plan goes states that one of its strategic principles is to:</p> <p>5. ‘Achieve [more] efficient use of</p>	<p>The draft policy should therefore be amended to reflect the London Plan policy position as a minimum but preferably the Council should release the norther section of the site from its LIL designation and recognise that the LIL as a whole has been intensified significantly and that the remainder of the site has no prospect of coming back into industrial use in the short term (as stated by the Council’s Employment Land Review 2022) or the long-term due to the very limited developable footprint. We therefore implore the Council to remove the site from the LIL designation so that a more suitable and beneficial use like co-living or residential development come forward.</p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the site is currently occupied by light industrial businesses and provides an opportunity for site intensification through the delivery of small to medium scale warehousing units within the LIL boundary. While the permitted industrial uses at the southern part of the site are not yet fully completed, the designation of the site as a Local Industrial Location remains appropriate to support industrial intensification and address the borough’s significant need for industrial floorspace as identified in the Employment Land Review 2022. Release of the LIL boundary or allowing co-location at this location would be harmful to the supply of LIL and employment land across Newham.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>
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	LB Newham Response	Proposed modifications and explanation	Representor Comment	Complies with Duty to Cooperate?	Consistent with the London Plan?	Consistent with the NPPF?	Effective?	Justified?	Positively prepared?	Sound?	Legally Compliant?	Implementation text	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Agent	Representor	Representation Reference
			<p>Architecture demonstrates that the site has a complex network of important utilities that run through various parts of the site. The utilities include High, Medium and Low Pressure Gas Pipes, a High Pressure Water Pipe below ground and High Voltage Electricity Pylons which run above the site adjacent to the Motorway. All utilities have easements which restrict the developable area to the area shown in white on the top half of the image below.</p> <p>[Image inserted - Plan Showing Utilities running through the site]</p> <p>Alterations to a limited number of the existing services would increase developable area. However, it is a very costly exercise only enabled through efficient redevelopment of the site, thereby requiring the resulting development to offer appropriate viability. The Employment Land Review 2022 fails to acknowledge any of these factors when assessing the suitability of the site as a LIL which is a fundamentally flawed approach and emphasises the “hope value” that has been assigned to the site redevelopment as an industrial use.</p> <p>The map above and in the attached document clearly outlines that the application site has a very limited developable footprint due to these constraints which do not allow for the development of viable industrial buildings and servicing roads. The only way to viably increase the density on site is the increase the height of the proposed buildings and provide a non-industrial use on these upper floors such as residential, student or co-living. The current policy position would allow the removal of the current non-industrial uses on site and their replacement with a residential alternative due to the managed intensification that has already occurred on site, whereas the draft wording of the Policy J2 completely removes the ability for residential development or co-location on this site which is completely contrary to London Plan Policy E7.</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
Reg19-E-179	AIM Land Ltd	Rolfe Judd	Reg19-E-179/017	Inclusive Economy	J1 Employment and growth			LIL10			Blank	No					No	Blank	The site’s designation as a LIL is also questionable given there is no existing industrial floorspace on site and the introduction of an industrial unit on site is unviable due to the limited developable footprint of the site.	We make the following recommendations for the next iteration of the Draft Local Plan: - De-allocate the 970 Romford Road site from the LIL designation due to it having no existing industrial floorspace on site and no realistic or viable prospect of the site being redeveloped for industrial use. - Amend the wording of Draft Policies J1 and J2 to allow for co-location in LILs;	A change to this policy approach has not been made. We did not consider this change to be necessary as the site is currently occupied by light industrial businesses and provides an opportunity for site intensification through the delivery of small to medium scale warehousing units within the LIL boundary. While the permitted industrial uses at the southern part of the site are not yet fully completed, the designation of the site as a Local Industrial Location remains appropriate to support industrial intensification and address the borough’s significant need for industrial floorspace as identified in the Employment Land Review 2022. Release of the LIL boundary or allowing co-location at this location would be harmful to the supply of LIL and employment land across Newham.  The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-181	LAMIT c/ CCLA Investment Management Ltd	Rolfe Judd Planning	Reg19-E-181/009	Inclusive Economy	J1 Employment and growth			SIL1			Blank	Blank						Blank	[Key Emerging Policies  The following draft policies are relevant to the Alpine Way site:]  J1 (Employment and Growth) provides the framework for promoting inclusive, green economic growth by supporting industrial and office developments across the borough. The London Industrial Park, located directly to the north and east of the Alpine Way site, is identified as a Strategic Industrial Location (SIL), prioritizing large-scale industrial uses such as warehousing, logistics, and food and drink production.		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-194	London Borough of Tower Hamlets		Reg19-E-194/007	Inclusive Economy	J1 Employment and growth			SIL6											<ul style="list-style-type: none"><li>J1 – We support the continued designation of Fish Island/Bow Goodsyrd as Strategic Industrial Land, the safeguarding of the railhead, and the protection of the site for industrial uses, and we would welcome closer working on plans for redevelopment on the site across both sides of the borough boundary to ensure that both boroughs benefit from enhancements to the public realm and the introduction of sustainable industrial uses. We are aware there is an extant planning application (24/00122/OUT) – which is to be determined by the LLDC given its location - and we would wish that Newham ensure that determination of this application is in conformity with the adopted and emerging Newham policies as well as London Plan policies in relation to protection of SIL. As part of redevelopment here we would expect to see modern and sustainable industry, alongside place-shaping principles which deliver good growth (e.g. public realm improvements, permeability, legibility, quality design, safety etc.) to be implemented across the site regardless of the administrative boundary. This is reflected in our draft local plan and we would hope is reflected as part of any pre/application discussions with applicants.</li></ul>		Support noted.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/040	Inclusive Economy	J1 Employment and growth			Table 6											<p>Policy J1 Employment and growth</p> <p>7.2 St William remain concerned that Table 6 within Policy J1 which sets out the priority uses for the Strategic Industrial Locations within the borough (including Beckton Riverside (SIL 5)) continues to state within the functional requirements that no residential floorspace will be permitted in these designations. Whilst supportive in principle of the priority uses identified for SIL 5: Beckton Riverside, the Beckton Riverside area is proposed to be transformed through residential led mixed use development into a new neighbourhood as set out in site allocation N17.SA1.</p> <p>7.3 St William therefore maintain that it would be too prohibitive or restrictive to fully preclude residential uses from SIL5 should the opportunity arise to intensify the SIL or enable co-location of residential and industrial uses through design in this SIL. St William have therefore suggested again that the restriction on residential floorspace in this location is removed.</p>	<p>[Appendix 12: General Policies – Suggested amendments]</p> <p>SIL5: Beckton Riverside <b>[under Design and Delivery Principal column]</b></p> <p><del>i. No residential floorspace is permitted in these designations.</del></p> <p>ii. New office floorspace (E(g)(ii)) will be supported only where it is ancillary to the function of the industrial floorspace and of an appropriate scale.</p>	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council’s response has not changed.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/004	Inclusive Economy	J1 Employment and growth						Blank							Blank	Draft Policy J1 sets out the need to support diverse, inclusive and green economic growth to deliver more jobs within Newham over the plan period to 2038. As with the comments provided at Regulation 18 stage, TSP agrees with the core messaging of the policy as it aligns with the NPPF (2023, and consultation draft amendments to the NPPF) to support economic growth. This policy sets out the approach to enable, grow and diversify Newham’s economy whilst encouraging the provision of high-quality development.		Support noted.
Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/045	Inclusive Economy	J1 Employment and growth						Blank							Blank	Part 1: TSP supports that developments will be expected to support diverse, inclusive and green economic growth and contribute to meeting the borough’s office and industrial needs.		Support noted.
Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/045b	Inclusive Economy	J1 Employment and growth						Blank							Blank	Part 2: TSP support the inclusion of wording in Part 2 which confirms that mixed use site allocations are an important contributor to employment generation.		Support noted.
Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/045c	Inclusive Economy	J1 Employment and growth						Blank	No						Blank	Part 3: TSP has concerns in relation to the requirement for all employment floorspace proposals to submit an Economic Strategy, including those in areas in locations identified as suitable for employment floorspace. It is not clear whether the benefits of providing such a Strategy outweigh the impact reviewing it will have on LBN Development Management resourcing, with another submission document to consider, and the ability to determine planning applications in a timely manner aligned to statutory determination periods which is already routinely not achieved. LBN should be seeking to adopt a Local Plan which supports the Development Management team’s ability to process planning applications for positive, sustainable development in a timely manner, rather than to burden the team with additional reports on top of the significant number that is already required.	It is agreed that it may be appropriate for planning conditions to require the submission of Economic Strategies in certain circumstances. The draft wording should be updated accordingly.	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy approach to reducing the scope for Economic Strategy requirement from all developments incorporating employment floorspace to only major developments incorporating employment floorspace. The Council’s response has not changed.

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Reg19-E-203	GLP (International Business Park, Rick Roberts Way)	Quod	Reg19-E-203/003a	Inclusive Economy	J1 Employment and growth			LIL4											[GLP support the Regulation 19 draft Local Plan designation of the Site as a Local Industrial Location and the associated continued protection of industrial uses at the Site. As noted in our previous representations, this protection recognises the key role the Site has in local employment provision in Stratford. It further recognises the Site’s potential for redevelopment and intensification of employment uses to contribute towards meeting LB Newham’s policy requirements. GLP also welcomes the continued designation of the site for industrial use through Policy J1 LIL4 and that Policy J1, part 2f <a href="#">[reference to policy J1 LIL4 and policy J1, part 2f]</a> provides flexibility for future development to respond to market trends and new economic sectors.]		Support noted.
Reg19-E-203	GLP (International Business Park, Rick Roberts Way)	Quod	Reg19-E-203/003b	Inclusive Economy	J1 Employment and growth		J1.2a												Notwithstanding this, we recommend that the following amends are made to Policy J1, part 2a (shown in red) to provide further flexibility for the site to accommodate a number of industrial uses to respond to market demand...	[Notwithstanding this, we recommend that the following amends are made to Policy J1, part 2a (shown in red) to provide further flexibility for the site to accommodate a number of industrial uses to respond to market demand:]  “The development of industrial floorspace for research and development (E(g)(ii)), light industrial (E(g) (iii)), general industrial (B2), storage or distribution (B8) (including dark kitchen/ shop and micro fulfilment) and industrial related sui generis (SG) uses (including waste, utilities including digital/data <b>centres</b> and <b>parking</b> /transport depots) should be located in Strategic Industrial Locations (SILs) and Local Industrial Locations (LILs).”	This wording change is not supported. We did not consider this change to be necessary as while data centres are currently widely accepted as Use Class B8, its use class classification is subject to wider scrutiny and may change over the plan period. Parking as a standalone use is not considered an industrial use in the London Plan and hence not appropriate to be directed to the designated employment locations. Any new development with parking provision for employment uses have to be in line with the requirement set out in Policy T3. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-206	GLP (Land at Central Thameside West and Former Alnex site)	DP9	Reg19-E-206/03	Inclusive Economy	J1 Employment and growth			2(a)			No	No							We consider that Policy J1 2(a) should be amended to explicitly state that data centre uses fall within Use Class B8. This land use is accepted by Newham as demonstrated in the application at the Site (ref. 23/01697/OUT) where the data centres are considered to fall within Use Class B8.		This wording change is not supported. We did not consider this change to be necessary as while data centres are currently widely accepted as Use Class B8, its use class classification is subject to wider scrutiny and may change over the plan period. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-206	GLP (Land at Central Thameside West and Former Alnex site)	DP9	Reg19-E-206/06	Building a Fairer Newham	J1 Employment and growth			2a											Recommendation 1: Amend Policy BFN1(3a) to include reference to data centre uses specifically for the GLP site and for Policy J1(2a) to confirm that data centre uses fall within Use Class B8.	Suggested track changes to policies: J1: a. The development of industrial floorspace for research and development (E(g)(ii)), light industrial (E(g) (iii)), general industrial (B2), storage or distribution (B8) (including dark kitchen/ shop and micro fulfilment), <b>data centre (B8)</b> and industrial related sui generis (SG) uses (including waste, utilities including digital/data and transport depots) should be located in Strategic Industrial Locations (SILs) and Local Industrial Locations (LILs). Uses identified in Tables 6 and 7 should be prioritised in each location.	This wording change is not supported. We did not consider this change to be necessary as while data centres are currently widely accepted as Use Class B8, its use class classification is subject to wider scrutiny and may change over the plan period. The Council is satisfied that the plan remains sound without the proposed changes.

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Reg19-E-206	GLP (Land at Central Thameside West and Former Alnex site)	DP9	Reg19-E-206/07	Building a Fairer Newham	J1 Employment and growth			SIL3, p182, Table 6											Recommendation 1: Amend Policy BFN1(3a) to include reference to data centre uses specifically for the GLP site and for Policy J1(2a) to confirm that data centre uses fall within Use Class B8.	Suggested track changes to policies: SIL.3: Thameside West Large scale industrial and small scale light industrial, suitable for: • clean, green and low carbon industries; <b>and</b> • <b>data centres</b> ; and • wharf related uses (on Peruvian and Royal Primrose wharves); and • cultural and creative production; and • digital and high technology industries.	This wording change is not supported. We did not consider this change to be necessary as while data centres are currently widely accepted as Use Class B8, its use class classification is subject to wider scrutiny and may change over the plan period. We have only included uses in Table 6 that have been identified through Employment Land Review 2022 as priority uses. Wider digital and high technology industries have already been included in the priority uses at SIL3. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-218	IXDS	RPS	Reg19-E-218/017	Inclusive Economy	J1 Employment and growth			2.c			Yes	No						Yes	<p>It is understood that Local Mixed Use Areas (LMUAs) are intended to be suitable for either solely employment development or mixed-use employment led development (and not just employment-led development). This needs to be clarified in policy terms. This is indeed confirmed within the Council's recent evidence base document: 'Proposed New Employment Land Designation and Boundary Amendments (Regulation 19) (July 2024)', which, on page 12, with reference to the new LMUA designation for Bidder Street, confirms that "A planning application for a data centre (ref 24/00088/FUL) is currently in on the LMUA and pending for decision. This is considered no conflict with the LMUA designation as data centre is widely accepted as Use Class B8 (subject to wider scrutiny) which is allowed in LMUA, LIL and SIL under the Local Plan". Policy J1, at part 2(c) should therefore clearly identify that LMUAs are suitable for development comprised solely of employment uses.</p> <p>This change is important to ensure that the allowances and limits of the policy can be clearly understood and to ensure that the policy is therefore fit for purpose.</p> <p>Policy J1, at part 2(c) should therefore clearly identify that LMUAs are suitable for development comprised solely of employment uses.</p> <p>This change is important to ensure that the allowances and limits of the policy can be clearly understood and to ensure that the policy is therefore fit for purpose.</p>	<p>[Deletions in strikethrough text Additions in underline text</p> <p>"J1: Employment and Growth]</p> <p>[c. The development of office (E(g)(i)), research and development (E(g)(ii)), light industrial (E(g) (iii)) and storage or distribution (B8) (including dark kitchen/ shop and ,micro fulfilment and data centres) uses will be supported in Local Mixed Use Areas (LMUA),] <b>either in isolation or</b> as part of employment-led <b>mixed use</b> development. Uses identified in Table 8 should be prioritised in each location.</p>	<p>The need for clarification of the terminology 'employment-led' development is noted. This has been rectified by making the following changes to Policy J1 and the Glossary:</p> <p>J1 Implementation Text: Employment-led development is required to first meet employment needs (including the viable operation of employment uses on the site and where relevant, adjacent sites) in any design, and then other uses such as residential can be fitted around it. <b>Employment-led development can consist of employment only development but must still demonstrate that the employment needs at the site are being met.</b></p> <p>Glossary: Employment-led development: Employment-led development requires schemes to first meet employment needs (including the viable operation of employment <del>generating</del> uses on the site and where relevant, adjacent sites) in any design, and then other uses such as residential to be fitted around it. <b>Employment-led development can consist of employment only development but must still demonstrate that the employment needs at the site are being met.</b> which are included in the modification table.</p>



Inclusive Economy Comments to the <a href="#">full Regulation 19 Representations</a>																								
Reg19 -E-218	IXDS	RPS	Reg19-E- 218/018	Inclusive Economy	J1 Employment and growth			2			Yes	No					Yes	<p>Furthermore, Policy J1 is detailed to the extent that it confirms different types of uses that are acceptable in LMUAs within different use classes, including ‘dark kitchen/shop’ and ‘micro fulfilment’ within the B8 category.</p> <p>Given the confirmation within the Council’s recent evidence base document: ‘Proposed New Employment Land Designation and Boundary Amendments (Regulation 19) (July 2024)’ identified above, data centres should be specifically identified as an acceptable B8 use within LMUAs and the policy adjusted accordingly, at parts 2(a), (b) and (c). Tables 6 and 8 should also be updated to refer to data centre uses as being priority uses in appropriate locations, this includes for the Mayer Parry Wharf site (comprising the northern part of the N4.SA5 draft Canning Town Riverside Site Allocation) within LMUA12, which is the subject of planning application reference 24/00088/FUL for a data centre development and the Former Paint Factory and Central Thameside West site within SIL3, where a data centre development was approved under planning application reference 23/01697/OUT.</p> <p>To ensure consistency with the National Planning Policy Framework (NPPF) (2023) paragraphs 85, 86 and 87 and draft NPPF (2024) paragraphs 83, 84 and 85), the requirements of London Plan Policy SI6 and to reflect and recognise the ‘Critical National Infrastructure’ (CNI) classification that now applies to data centres in the UK (as per the press release [see hyperlink in representation form] from the Department for Science, Innovation and Technology on the 12th September 2024), digital infrastructure should benefit from being explicitly referenced and suitably emphasised within this policy to reflect the significant, overarching emphasis on the local, national and regional importance of such infrastructure, including data centres. This will ensure that the digital and data economy is properly planned for and that the importance of such infrastructure is afforded appropriate weight in the determination of planning applications.</p>	<p>Deletions in <del>strike through text</del> Additions in <u>underline text</u></p> <p>”J1: Employment and Growth ... 2. New employment floorspace should be directed to, and delivered in accordance with the following spatial strategy and functional requirements and the design and delivery principles outlined in Local Plan Policy J2: a. The development of industrial floorspace for research and development (E(g)(ii)), light industrial (E(g) (iii)), general industrial (B2), storage or distribution (B8) (including dark kitchen/ shop <del>and</del> ,micro fulfilment <b>and data centres</b>) and industrial related sui generis (SG) uses (including waste, utilities including digital/data and transport depots) should be located in Strategic Industrial Locations (SILs) and Local Industrial Locations (LILs) <b>although are not precluded from being located in other appropriate locations as identified below</b>. Uses identified in Tables 6 and 7 should be prioritised in each location.</p> <p>b. In addition to the locations identified above, the development of industrial uses for research and development (E(g)(ii)), light industrial (E(g)(iii)), general industrial (B2), storage or distribution (B8) (including dark kitchen/ shop <del>and</del> ,micro fulfilment <b>and data centres</b>) and industrial related sui generis (SG) uses (including waste, utilities including digital/ data and transport depots) may be located on retail and leisure parks with good accessibility to the Strategic Road Network.</p> <p>c. The development of office (E(g)(i)), research and development (E(g)(ii)), light industrial (E(g) (iii)) and storage or distribution (B8) (including dark kitchen/ shop and ,micro fulfilment <b>and data centres</b>) uses will be supported in Local Mixed Use Areas (LMUA), [either in isolation or as part of employment-led <b>mixed use</b> development]. Uses identified in Table 8 should be prioritised in each location.</p> <p>Table 6: Strategic Industrial Locations (SILs) Local Mixed Use Areas (LMUAs)</p> <p>Designation: SIL3: Thameside West</p> <p>Priority Uses: Large scale industrial and small scale light industrial, suitable for:</p> <ul style="list-style-type: none"><li>• clean, green and low carbon industries; and</li><li>• wharf related uses (on Peruvian and Royal Primrose wharves); and</li><li>• cultural and creative production; and</li><li>• digital and high technology industries, <b>including data centres</b>.</li></ul> <p>Design and Delivery Principles</p> <p>i. No residential floorspace is permitted in these designations.</p> <p>ii. New office floorspace (E(g)(i)) will be supported only where it is ancillary to the function of the industrial floorspace and of an appropriate scale.</p> <p>Table 8: Local Mixed Use Areas (LMUAs) Local Mixed Use Areas (LMUAs) Designation: LMUA12: Bidder Street</p> <p>Priority Uses:</p> <ul style="list-style-type: none"><li>• Light industrial, warehousing and logistics</li></ul>	<p>The wording changes on SIL3 and LMUA12 are not supported. We did not consider this change to be necessary as we have only included uses in Tables 6 and 8 that have been identified through Employment Land Review 2022 as priority uses. Wider digital and high technology industries have already been included in the priority uses at SIL3 and LMUA12. It is clear that our Plan should proceed based on the December 2023 NPPF following the transitional arrangement and our policy is in conformity with the NPPF and the London Plan as the delivery of data and digital growth is already covered in Policy W4, the Inclusive Economy Policy and relevant Neighbourhood Policies. Data centres are considered an employment use and proposals will be subject to requirements as set out in the Inclusive Economy Policy as well as any other relevant policies in the Plan.</p> <p>While data centres are currently widely accepted as Use Class B8, its use class classification is subject to wider scrutiny and may change over the plan period.</p> <p>The Council is satisfied that the plan remains sound without the above proposed changes.</p> <p>Nonetheless, the need for clarification of the terminology 'employment-led' development is noted. This has been rectified by making the following wording changes to Local Plan Policy J1 and the Glossary:</p> <p>J1 Implementation Text: Employment-led development is required to first meet employment needs (including the viable operation of employment uses on the site and where relevant, adjacent sites) in any design, and then other uses such as residential can be fitted around it. <b>Employment-led development can consist of employment only development but must still demonstrate that the employment needs at the site are being met.</b></p> <p>Glossary: Employment-led development: Employment-led development requires schemes to first meet employment needs (including the viable operation of employment <del>generating</del> uses on the site and where relevant, adjacent sites) in any design, and then other uses such as residential to be fitted around it. <b>Employment-led development can consist of employment only development but must still demonstrate that the employment needs at the site are being met.</b> which are included in the modification table.</p>				



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																				and workspaces <b>and data centres</b> . • Cultural and creative production, digital and technology industries, SMEs, flexible workspaces and storage.  Design and Delivery Principles i. Employment led co-location with residential development is supported. ..."	
Reg19-E-225	London Borough of Greenwich		Reg19-E-225/009	Inclusive Economy	J1 Employment and growth						Blank	Blank						Blank	<p>Employment Land and Strategic Industrial Land:</p> <p>1.17 In paragraph 4.60 of Newham Draft Submission Local Plan Duty to Cooperate Statement July 2024 the London Borough of Newham identify that they submitted a response on Royal Greenwich's initial phase of consultation on Royal Greenwich's new Local Plan. Paragraph 4.60 details that this response suggested consideration of the agent of change principle on the Royal Greenwich's Strategic Development Locations abutting the River Thames to Newham's Strategic Industrial Locations (SIL) across the river, to ensure existing industries can continue to operate on the SIL.</p> <p>1.18 Royal Greenwich appreciates Newham Council's concerns on this matter. It is noted that the same consideration about agent of change considerations for Newham Council's Strategic Development Locations abutting the River Thames to Royal Greenwich's SIL across the river also applies. Royal Greenwich welcomes any future discussion with Newham Council on this matter. Royal Greenwich have commissioned an update to their Employment Land Review and Employment Needs Assessment to inform Draft Local Plan policies.</p>		Comment noted. This comment has been subject to further engagement with the Royal Borough of Greenwich 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.

Reg19 -E-231	IDM Properties LLP	Iceni Projects	Reg19-E- 231/007	Inclusive Economy	J1 Employment and growth			LMUA9			Yes	No					Yes	<p>Response to Draft Local Plan</p> <p>The Canning Road West LMUA Designation</p> <p>The site is within the Canning Road West LMUA, and therefore any future development on this site would have to be employment-led to align with draft Policy J1.2.</p> <p>The Employment Land Review (1) outlines that LMUA9 allocation comprises 3 specific sites:</p> <ul style="list-style-type: none"><li>• The north west of the allocation is occupied by an industrial training facility, within the former engine room for the West Ham Pumping Station</li><li>• The eastern portion is occupied by plant services facilities and yard</li><li>• The south (the site) is a former office building which is now in residential use (Channelsea House), and the second block (GTEC House), which is in relatively poor condition</li></ul> <p>The LMUA9 is physically divided by the Greenway and is recognised as “separate clusters(2)” with each site “relatively self-contained”(3). As can be seen within Figure 2 [see Figure 2: The Canning Road West LMUA, Newham Draft Policies Map at p. 4], the southern part of the allocation is particularly separate from the other two sites, and due to its location sits as its own entity.</p> <p>Furthermore, in terms of land use, it is again an anomaly within this allocation, having minimal economic output or use, being predominately residential in nature.</p> <p>The only commercial use within this cluster is GTEC House, which has a very low employment density and, as recognised in the Employment Land Review, is of poor quality. IDM therefore believe the wider site should be characterised as predominantly residential.</p> <p>The Employment Land Review states that when considering sites for LMUA status, sites that were remote from other employment areas were not included. Since the southern portion of LMUA9 is both physically and economically isolated from the rest of the LMUA9, it is unclear why it has been included.</p> <p>[Notes: (1) July 2022, Appendix E, Land Audit LMUAs (2) Employment Land Review July 2022, Appendix E, Land Audit LMUAs, page 119 (3) Employment Land Review July 2022, Appendix E, Land Audit LMUAs, page 119]</p> <p>There is no viable existing commercial space on site that is worthy of protection, as per the definition of the LMUA, and there are no existing businesses co-locating or receiving mutual benefit across the wider area. Given the approach outlined in the Employment Land Review, its inclusion within the allocation is wholly inappropriate.</p> <p>Implication of LMUA Designation IDM consider that the existing hardstanding area to the front of Channelsea House has development</p>	<p>Proposed Alterations</p> <p>Based on the evidence presented above, the following alterations are suggested to the emerging Local Plan:</p> <ul style="list-style-type: none"><li>•The LMUA9 designation should be amended so that it this only includes the northern and eastern parts with the southern portion removed from this allocation. This should also be updated on the draft Policies Map, with the layer relating to LMUA amended so this only includes the northern and eastern portions.</li></ul>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as there is an opportunity for industrial intensification on the southern part of the site as informed by the Employment Land Review 2022. The existing site conditions and constraints were already considered when formulating the Canning Road West LMUA boundary. Employment-led co-location is supported at this site which allows residential to come forward as part of the development as set out in Policy J1. Policy J3 provides flexibility that applicant can submit a Relocation Strategy to demonstrate reasonable endeavours to relocate existing businesses for more efficient use of land. The Council is satisfied that the plan remains sound without the proposed changes.</p>
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																			<p>focused on the regeneration of Stratford and the Royal Albert Docks (which now benefits from Crossrail). The study concludes that the office market has a large supply that outstrips demand in Newham, and consequently any office space should be directed towards Stratford Town Centre.</p> <p>• It is further acknowledged that there has been a shift in office demand from similar out-of-centre sites to town and city centres where there is access to local amenities, and whilst discussing the site, it is noted(6) that the site has limited access to local convenience, facilities or shopping areas, with the nearest retail centre located 600m away at Church Street Local Centre. The site is therefore not favourable for employment-led development due to its location, and given these research findings, it should be questioned as to why the site has been included within the LMUA9.</p> <p>[Note: 6 Employment Land Review July 2022, Appendix E, Land Audit LMUAs, page 119]</p> <p>Ultimately, the implication of the LMUA designation is that any employment-led development that is bought forward on this site would encounter significant viability challenges, with much of the floorspace remaining vacant, limiting its contribution to Newham’s economy and wider placemaking.</p> <p>Conclusion This representation has been made on behalf of IDM to the LB Newham in relation to their emerging Local Plan. We reiterate our strong position that the LMUA9 designation needs to be reconsidered, specifically in relation to the southern part of this (the site). At present, this fails to understand the physical and economic separation of the site, as well as the lack of demand for office floorspace within this location. It has been suggested that the LMUA9 allocation is amended to exclude the southern portion of the site, to enable residential-led development which would be a key to unlocking sustainable growth within Newham, promoting good placemaking.</p>		

[illegible]

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																					which are included in the modification table.  This comment has been subject to further discussion with the GLA. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report.
Reg19-E-112	SEGRO	Gerald Eve	Reg19-E-112/018	Inclusive Economy	J2 New employment floorspace						Blank	No						Blank	SEGRO welcomes the change in language of part 1 of the draft policy to include the word ‘format,’ however further clarification is required on this. It is suggested that additional text is included to recognise that industrial intensification can take the form of yard space, as whilst this may not increase floor area it is nonetheless meeting an important need.		This wording change is not supported. We did not consider this change to be necessary as Policy J3 is clear that industrial intensification also includes yard space. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-112	SEGRO	Gerald Eve	Reg19-E-112/019	Inclusive Economy	J2 New employment floorspace						Blank	No						Blank	SEGRO reiterates the representations made to the Regulation 18 version (part 5(b)) of the Local Plan <b>[see Appended – Regulation 18 Draft Local Plan SEGRO response]</b> as these comments remain applicable to the Regulation 19 version. Further justification and details are set out within our Regulation 18 representations.		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council’s response has not changed.
Reg19-E-178	Royal Docks		Reg19-E-178/029	Inclusive Economy	J2 New employment floorspace						Blank	Blank						Blank	[The comments below and in the attached schedule set out some areas where we feel amendments or additions to the Plan could further support the Council and the RDT’s work. In the attached schedule are a series of specific changes which we have organised with reference to the pages and policies of the draft.]  Detailed Comments Schedule: Consideration should be given to including creative and cultural uses in the definition of the policy to ensure that the aspirations for cultural growth can be achieved.		A change to this policy approach has not been made. We did not consider this change to be necessary as the definition of Cultural and Creative Industry/Production is included in the Glossary and Abbreviations section in the Plan. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-180	PEACH: The People's Empowerment Alliance for Custom House		Reg19-E-180/021	Inclusive Economy	J2 New employment floorspace						Blank	Blank						Blank	New employment floorspace In relation to policy J2: We believe that office/employment floorspace should never take precedence over housing, and particularly council and social rent house building.		Comment noted. The Council recognised both housing and employment floorspace are crucial to the growth and development of our borough, where both are integral to the Plan's vision and objectives. The delivery of affordable homes and employment floorspace are addressed through the Spatial Strategy, Inclusive Economy Policy and Policy H3. Housing and employment floorspace are directed to site allocations and employment sites as informed by evidence.
Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/046	Inclusive Economy	J2 New employment floorspace						Blank							Blank	Part 4: TSP welcome the recognition that employment floorspace is an important factor in delivering the 15-minute neighbourhood. It is noted that in the HPA TSP has complied with the requirement for sequential testing of office developments as set out at Part 4.		Support noted.

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Reg19-E-218	IXDS	RPS	Reg19-E-218/025	Inclusive Economy	J2 New employment floorspace			2.a			Yes	No						Yes	<p>It is understood that Local Mixed Use Areas (LMUAs) are intended to be suitable for either solely employment development or mixed-use employment led development (and not just employment-led development). This needs to be clarified in policy terms. This is indeed confirmed within the Council’s recent evidence base document: ‘Proposed New Employment Land Designation and Boundary Amendments (Regulation 19) (July 2024)’, which, on page 12, with reference to the new LMUA designation for Bidder Street, confirms that “A planning application for a data centre (ref 24/00088/FUL) is currently in on the LMUA and pending for decision. This is considered no conflict with the LMUA designation as data centre is widely accepted as Use Class B8 (subject to wider scrutiny) which is allowed in LMUA, LIL and SIL under the Local Plan”. Policy J2, at part 2, should therefore clearly identify that LMUAs are suitable for development comprised solely of employment uses. This change is important to ensure that the allowances and limits of the policy can be clearly understood and to ensure that the policy is therefore fit for purpose.</p>	<p>Key to modifications: Deletions in <del>strike through text</del> Additions in <u>underline text</u></p> <p>”J2: New employment floorspace</p> <p>1. All developments on Strategic Industrial Locations (SILs) and Local Industrial Locations (LILs) must intensify site use to deliver a net increase in industrial floorspace through the most appropriate intensification format. <b>Developments that co-locate industrial floorspace development with residential development are not supported in SILs and LILs.</b></p> <p>2. <b>Within Local Mixed Use Areas (LMUAs) and Micro Business Opportunity Area (MBOAs), the provision of new industrial floorspace is supported.</b> Co-location of industrial development with residential development is <del>also only</del> supported in <del>LMUAs and MBOAs, but only where in the specific Local Mixed Use Areas (LMUAs) and Micro Business Opportunity Areas (MBOAs)</del> identified in Tables 8 and 9 in Local Plan Policy J1 and specific site allocations and where:</p> <p>a. the development remains employment-led in LMUAs, MBOAs and site allocations identified for employment-led development; and</p> <p>b. a suitable co-location design can be accommodated which maintains the function and viability of the priority uses on site and the amenity of the residential accommodation; and</p> <p>c. a suitable and robust Relocation Strategy for any existing businesses that cannot be incorporated within the redevelopment is provided in accordance with Local Plan Policies J3.2 ad J3.3.</p> <p>...”</p>	<p>The need for clarification of the terminology 'employment-led' development is noted. This has been rectified by making the following wording changes to Policy J1 and the Glossary:</p> <p>J1 Implementation Text: Employment-led development is required to first meet employment needs (including the viable operation of employment uses on the site and where relevant, adjacent sites) in any design, and then other uses such as residential can be fitted around it. <b>Employment-led development can consist of employment only development but must still demonstrate that the employment needs at the site are being met.</b></p> <p>Glossary: Employment-led development: Employment-led development requires schemes to first meet employment needs (including the viable operation of employment <del>generating</del> uses on the site and where relevant, adjacent sites) in any design, and then other uses such as residential to be fitted around it. <b>Employment-led development can consist of employment only development but must still demonstrate that the employment needs at the site are being met.</b> which are included in the modification table.</p>
Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/16	Inclusive Economy	J2 New employment floorspace			J2.2											<p>Inclusive Economy Policy J2: New employment floorspace</p> <p>Part 2 of the draft policy only supports co-location between industrial and residential development in the specific Local Mixed Use Areas and on Micro Business Opportunity Areas identified in Policy J1 Tables 8 and 9, as well as specific site allocations - previously, the Regulation 18 version had not accounted for strategic sites.</p> <p>This includes the site allocations at N2.SA2 Lyle Park West and N2.SA3 Connaught Riverside, which we support.</p>		<p>Support noted.</p>



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Reg19-C-023	Bob Sharples		Reg19-C-023/006	Inclusive Economy	J3 Protectin g employm ent floorspac e						Yes	Yes						Yes	<p>Traditional forms of employment have been changing in the last 100 years, unfortunately the perception of what employment land is has not. The introduction of B8 distribution challenged local authorities in the 80's and '90s as more of these uses came forward. Sport is often overlooked as an employer.</p> <p>It is estimated that in 2013, there was a total of 2,336 people employed via sport in Newham with an economic generation of £97.1m into the local economy. There were wider values as well in saving £96m in the health economy and generating £10.6m in wider spending with a further £23.3m in volunteering. Looking at statistics for manufacturing employment in 2023 in Newham the figure is 4,000 that is just less than double compared to sport! The numbers working in Information and technology is just a few hundred more than working in sport.</p> <p>Therefore, Sport England contents that sport should be considered as employer.</p> <p><a href="https://www.nomisweb.co.uk/reports/lmp/la/1946157255/report.aspx">https://www.nomisweb.co.uk/reports/lmp/la/1946157255/report.aspx</a> <a href="https://www.sportengland.org/guidance-and-support/measuring-impact?section=local_economic_value">https://www.sportengland.org/guidance-and-support/measuring-impact?section=local_economic_value</a></p>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as Local Plan Policy SI3 already provides a strong approach to the need to deliver new leisure facilities of the type needed in the right location. The approach delivers the recommendations in the Built Leisure Needs Assessment. Applications for the provision of new leisure facilities on employment sites would assessed in accordance with Policies SI2 and SI3.</p>

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Reg19-E-100	Simpson and Goldstein	Lichfields	Reg19-E-100/014	Inclusive Economy	J3 Protectin g employm ent floorspac e			Table 6			Yes	No						Yes	<p>We note that the wording of Policy J3 (Protecting employment floorspace) has been updated. The additional clarification of the requirements for protecting employment floorspace within different employment designations is welcomed and part 2 of the policy now relates solely to Local Mixed Use Areas. The draft policy continues to restrict the net loss of employment floorspace (including yard space) in Local Mixed Use Areas unless this can be relocated. While the updated policy removes the requirements for a financial contribution towards skills, training and local employment initiatives to be provided in these instances, the policy is still far too rigid, contradicts the co-location objectives of Policy J1 and fails to mention what should happen in instances either where sites are vacant and their yards are redundant, or where a yard space is ill-defined. The policy is not therefore effective.</p>	<p>Instead, the focus should be on protecting and re-providing employment generating built floorspace itself and meeting market demand.</p> <p>We therefore encourage additional commentary in the accompanying text to the policy to highlight that re-provision requirements focus on existing employment density and quality of the employment space. Reference to the need to re-provide the entire quantum of any yard space should be removed. Instead, the policy should focus on market demand, existing built floorspace and the contribution a specific site, including any yard space, makes to the wider stock of strategic employment land within the borough. Furthermore, factors such as trip generation associated with the existing employment use are important considerations that are currently missing from the policy. For instance, locations such as the Site, would more comfortably accommodate a residential (or quasi-residential) use with fewer trips generated than the previous Travis Perkins builders yard use.</p> <p>We continue to urge LBN to reconsider the wording of Part 2 of draft Policy J3 further because the supporting text to draft Policy J1 continues to contradict draft Policy J3 as it states that residential uses should be fitted around the optimum quantity and format of employment floorspace which can meet market demands. This may be less than the existing floorspace, particularly if external yards are protected in the same way as floorspace. As such, part 2 of draft Policy J3 should be updated to reflect that where replacement of employment floorspace results in improved quality and/or an increasednumber of jobs, it should be supported. This will ensure that Sites are optimised, reducing potential empty units and increasing much needed new homes. Such an approach would also align with the London Plan 2021. Until this change is made, the policy is not considered Sound as it is infective and inconsistent with draft Policy J1 and the aims of employment policies in the London Plan.</p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the policy is effective in addressing the borough's significant need for industrial floorspace as identified in the Employment Land Review 2022 where yard spaces are recognised as an importance second hand stock for industrial intensification. The exclusion of yard space for industrial intensification would be harmful to the supply of employment floorspace across Newham.</p> <p>Developments have to submit a Transport Assessment as set out in Policy T3, which the transport impact generated by the proposal will be considered by a case-by-case basis during the planning application stage.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>

Reg19 -E-102	Network Rail		Reg19-E- 102/016	Inclusive Economy	J3 Protectin g employ ment floorspac e						No	No					Blank	<p>[Outlined below are our comments pertaining to the soundness of the Council’s Regulation 19 Local Plan in relation to Bow Goods Yard.]</p> <p><u>[Employment]</u></p> <p>In relation to Policy J3 (Protecting Employment Floorspace), we consider this policy to be unsound. In order for the policy to be sound, it should align with the London Plan, specifically Policy E7 (Industrial Intensification, Co-Location and Substitution). Emerging Newham Local Plan Policy J3 should outline that if it can be demonstrated that selected parts of SIL or LSIS could be intensified to provide additional industrial capacity, then part of the identified SIL or LSIS can be released to support the delivery of other uses, including non-SIL compliant employment, office and leisure uses. The Policy should be updated to allow this SIL release approach to occur as part of a plan-led process of SIL or LSIS intensification and consolidation or as part of a co-ordinated masterplanning process in relation with the GLA and LBN.</p> <p>The London Plan is part of the Statutory Development Plan for London and informs decisions on planning applications across London, including LBN. Borough Local Plans must be in general conformity with the London Plan, to ensure that planning decisions reflect the overall strategy for London. Subsequently, in order for Policy J3 to be found sound, it should align with the London Plan and allow for an element of SIL release through the intensification and consolidation of SIL.</p> <p>The Outline Planning Application submitted for Bow Goods Yard is supported by a Stage 2 Masterplan Framework as required by the London Plan. This Stage 2 Masterplan Framework has demonstrated that the rail freight operations on the Site have been consolidated and intensified, resulting in an increase in operational capacity and thus allowing for an element of SIL release. In line with the London Plan, the SIL release should be clearly defined in Development Plan policies map as part of a plan-led process. The status of the Outline Planning Application should continue to be monitored and if approved, then the LBN proposals map should be updated to account for the SIL release allowed for by the planning application.</p> <p>Concluding Remarks</p> <p>For the reasons outlined above, it is our conclusion that certain policies within the draft submission Local Plan (Regulation 19) are unsound in relation to Bow Goods Yard namely due to the emerging Local Plan not aligning with the London Plan in relation to SIL release and the proposed maximum building heights. The Application submitted for Bow Goods Yard comprises a detailed evidence base, justifying the proposed SIL release and building heights, and thus should form a basis against which the draft policies</p>	<p>For the plan to be found sound, the emerging policies should also be aligned to the London Plan to ensure that planning decisions reflect the overall strategy for London. Therefore, the Local Plan should allow for an element of SIL release through the intensification and consolidation of SIL and this should be occur as part of a plan-led process or as part of a co-ordinated masterplanning process in relation with the GLA and LBN.</p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the policy is positively prepared, justified and effective. The site is designated as a Strategic Industrial Location for consolidation and intensification of the existing industrial uses including the safeguarded rail head, concrete batching plant and other employment floorspace, with the potential for redevelopment in form of large floorplate industrial accommodation to address the borough’s needs on industrial floorspace as identified in the Employment Land Review 2022. As the site is currently under planning and not yet commenced, any release of the Strategic Industrial Location will be harmful to the industrial land supply in the borough. The Council is satisfied that the plan remains sound without the proposed changes.</p>
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																			relating to the Site are formulated against, particularly if the application is approved before the emerging Newham Local Plan is adopted.		
Reg19-E-112	SEGRO	Gerald Eve	Reg19-E-112/020	Inclusive Economy	J3 Protectin g employm ent floorspac e						Blank	No						Blank	SEGRO welcomes the inclusion of the word 'capacity' in part 1 of draft policy J3.		Support noted.
Reg19-E-112	SEGRO	Gerald Eve	Reg19-E-112/021	Inclusive Economy	J3 Protectin g employm ent floorspac e						Blank	No						Blank	<p>[SEGRO welcomes the inclusion of the word 'capacity' in part 1 of draft policy J3.] However, the inclusion of the reference to 'jobs' is considered too binary and not suitable for the purposes of this policy. The jobs created or lost on a redevelopment of a site may be difficult to quantify, particularly if utilising prescribed figures based on land use and floor areas and a more flexible approach should be taken.</p> <p>SEGRO reiterates the representations made to the Regulation 18 version of the Local Plan (part 5(c)) <a href="#">[see Appended – Regulation 18 Draft Local Plan SEGRO response]</a> which states that 'floorspace' should be replaced with 'land' as in some cases, upgrading or enhancing an industrial site may result in the loss of floorspace through proposing a more efficient, flexible building which is fit for purpose.</p> <p>SEGRO reiterates the representations made to the Regulation 18 version (part 5(c) in relation to part 1 (previously part 2) <a href="#">[see Appended – Regulation 18 Draft Local Plan SEGRO response]</a> in relation to limited circumstances where employment floorspace can be lost.</p>		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council's response has not changed.
Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/047	Inclusive Economy	J3 Protectin g employm ent floorspac e						Blank	No						Blank	Silvertown includes existing industrial uses at Charles Street that are not considered to be relocatable on site. The stated requirement to support relocation of existing businesses should be refined to only apply in circumstances where the existing business is a small or medium sized business, where their relocation away from the site is as a direct consequence of the development proposal rather than their lease expiring, and where they are actively seeking relocation. Specifically in relation to Part 4, the proposed requirements should be clarified to not relate to site allocations, as the requirement to obtain marketing evidence and carry out 15-minute mapping could delay the delivery of strategically important regeneration.		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy wording to improve clarity on what applicants should do to demonstrate reasonable endeavours to relocate existing businesses as well as make it clear that developments on site allocation should follow the development principles as set out in relevant site allocations in the Local Plan. The Council's response has not changed.

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Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/17	Inclusive Economy	J3 Protectin g employm ent floorspac e			J3.2											Policy J3: Protecting employment floorspace Part 2 of draft Policy J3 notes that in limited circumstances where a loss of employment floorspace is supported, developments are required to: (a) relocate any existing businesses to suitable alternative employment premises or sites; and (b) provide financial contributions towards skills, training and local employment initiatives. Ballymore agrees that developers should be required to offer support and assistance to any existing business which needs to be relocated as a result of redevelopment of a site, however, the obligation must only be to offer support and the developer should not be penalised if the existing business choses to relocate without utilising the support offered. It is important that the implementation of schemes, following the grant of planning permission, comprising economic development are not unreasonably delayed.	Any obligation to assist with relocation should therefore be on the basis of a ‘reasonable endeavours’ clause and this should be made clear within the policy wording or supporting text.	A change to this policy approach has not been made. We did not consider this change to be necessary as it is clear in Policy J3 of the Local Plan that the Relocation Strategy should demonstrate reasonable endeavours to relocate existing businesses.  The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-C-007	Joana Simoes		Reg19-C-007/005	Inclusive Economy	J4 Delivery CWB and Inclusive Growth						No	No						No	I would say that overall the plan does not look at an inclusive economy, it does not mitigate against inequities, and the gap between the haves and the have nots will be wider. the map, on the contrary, aims to create new builds on every bit of Green space where developers will line their pockets, creating immense pollution with the construction, and sell flats for half a million plus, in exchange for a tiny park for toddlers, which does not meet the demands of the Newham residents, this is not a good place to live, work or study, I can tell you, and is becoming increasingly hard to raise a family safely in Newham.		A change to this policy approach has not been made. We did not consider this change to be necessary as the requirements for achieving inclusive economic growth are set out in Local Plan Policy J4. The policy objective is to secure high quality economic opportunities to support community wealth building for all local residents within our borough, which includes seeking developer's contribution on local training and employment including apprenticeship through the planning obligation requirement. All existing green space in the borough will be protect as required in Policy GWS1. New provision and enhancement of green space are incorporated in the site allocations requirements as informed by the Green and Water Infrastructure Strategy. Construction works should meet carbon reduction requirements as set out in Local Plan Policy CE3. Safety environment will be achieved through requirements set out in the Design policies.  The Council is satisfied that the plan remains sound without the proposed changes.

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Reg19 -C-012	Bavani Navaratnam		Reg19-C-012/003	Inclusive Economy	J4 Delivery CWB and Inclusive Growth						Yes	Yes						Yes	<p>Harnessing the power of the Developers: Where there is a sustained market demand, Businesses will thrive. Hence plan to create a market harnessing the investment power of the suppliers. With an influx of new housing related developments into the borough, the council should consider placing some conditions for developers to be using local labor, local contractors and local suppliers. Developers are required to invest in training local communities in skills. The developers can also form links with our local technical colleges, encouraged to influence the teaching curriculum and provide work placements for students, giving them valuable industry experience. Developers could also be encouraged to take local residents into employment and especially those in temporary and supported accommodations. This strategic planning opportunity should be used by the council to plan, bring together and prepare our local suppliers ,contractors, technical colleges and Supported Housing providers to step up to take advantage of this Business Market and rise up to the mark to meeting the local quotas imposed by the council on Housing Developers. Supported Housing providers can be a key ally in supporting local residents into taking up training and employment opportunities created in this area.</p>		<p>Comment noted.</p> <p>The requirements for achieving inclusive economic growth are set out in Local Plan Policy J4. The policy objective is to secure high quality economic opportunities for the local residents within our borough, which includes seeking developer's contribution on local training and employment including apprenticeship through the planning obligation requirement.</p> <p>The financial contributions will be used to support local training and employment including Our Newham Work. It will be used to support local disadvantaged groups to address barriers to employment and to benefit from employment opportunities created from developments in the borough. This is achieved via a number of support and upskilling mechanisms including activities to deliver job brokerage, employer-led training, construction skills training, apprenticeships, financial wellbeing and employment rights support to name a few.</p> <p>Significant investment has been made by the council and its partners to continue to develop and deliver its employment and skills provision in the borough. Newham Workplace was set up in 2007 to provide a single point of access for jobs brokerage activities to support both employers and residents. Since 2007, the brokerage has filled over 50,000 jobs with Newham residents. Our Newham Work has a proven track record of effectively managing and allocating funds for employment and skills development. The systems and processes we have in place are well-established and have consistently delivered positive outcomes for our residents.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>

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Reg19-C-013	Mariam Paul		Reg19-C-013/003	Inclusive Economy	J4 Delivery CWB and Inclusive Growth						Yes	Yes						Yes	<p>Harnessing the power of the Developers: Where there is a sustained market demand, Businesses will thrive. Hence plan to create a market harnessing the investment power of the suppliers. With an influx of new housing related developments into the borough, the council should consider placing some conditions for developers to be using local labor, local contractors and local suppliers. Developers are required to invest in training local communities in skills. The developers can also form links with our local technical colleges, encouraged to influence the teaching curriculum and provide work placements for students, giving them valuable industry experience. Developers could also be encouraged to take local residents into employment and especially those in temporary and supported accommodations. This strategic planning opportunity should be used by the council to plan, bring together and prepare our local suppliers ,contractors, technical colleges and Supported Housing providers to step up to take advantage of this Business Market and rise up to the mark to meeting the local quotas imposed by the council on Housing Developers. Supported Housing providers can be a key ally in supporting local residents into taking up training and employment opportunities created in this area.</p>		<p>Comment noted.</p> <p>The requirements for achieving inclusive economic growth are set out in Local Plan Policy J4. The policy objective is to secure high quality economic opportunities for the local residents within our borough, which includes seeking developer's contribution on local training and employment including apprenticeship through the planning obligation requirement.</p> <p>The financial contributions will be used to support local training and employment including Our Newham Work. It will be used to support local disadvantaged groups to address barriers to employment and to benefit from employment opportunities created from developments in the borough. This is achieved via a number of support and upskilling mechanisms including activities to deliver job brokerage, employer-led training, construction skills training, apprenticeships, financial wellbeing and employment rights support to name a few.</p> <p>Significant investment has been made by the council and its partners to continue to develop and deliver its employment and skills provision in the borough. Newham Workplace was set up in 2007 to provide a single point of access for jobs brokerage activities to support both employers and residents. Since 2007, the brokerage has filled over 50,000 jobs with Newham residents. Our Newham Work has a proven track record of effectively managing and allocating funds for employment and skills development. The systems and processes we have in place are well-established and have consistently delivered positive outcomes for our residents.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>



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Reg19-C-014	Rohima Shila		Reg19-C-014/003	Inclusive Economy	J4 Delivery CWB and Inclusive Growth						Yes	Yes						Yes		<p>Harnessing the power of the Developers: Where there is a sustained market demand, Businesses will thrive. Hence plan to create a market harnessing the investment power of the suppliers.</p> <p>With an influx of new housing related developments into the borough, the council should consider placing some conditions for developers to be using local labor, local contractors and local suppliers. Developers are required to invest in training local communities in skills. The developers can also form links with our local technical colleges, encouraged to influence the teaching curriculum and provide work placements for students, giving them valuable industry experience. Developers could also be encouraged to take local residents into employment and especially those in temporary and supported accommodations.</p> <p>This strategic planning opportunity should be used by the council to plan, bring together and prepare our local suppliers ,contractors, technical colleges and Supported Housing providers to step up to take advantage of this Business Market and rise up to the mark to meeting the local quotas imposed by the council on Housing Developers. Supported Housing providers can be a key ally in supporting local residents into taking up training and employment opportunities created in this area.</p>	<p>Comment noted.</p> <p>The requirements for achieving inclusive economic growth are set out in Local Plan Policy J4. The policy objective is to secure high quality economic opportunities for the local residents within our borough, which includes seeking developer's contribution on local training and employment including apprenticeship through the planning obligation requirement.</p> <p>The financial contributions will be used to support local training and employment including Our Newham Work. It will be used to support local disadvantaged groups to address barriers to employment and to benefit from employment opportunities created from developments in the borough. This is achieved via a number of support and upskilling mechanisms including activities to deliver job brokerage, employer-led training, construction skills training, apprenticeships, financial wellbeing and employment rights support to name a few.</p> <p>Significant investment has been made by the council and its partners to continue to develop and deliver its employment and skills provision in the borough. Newham Workplace was set up in 2007 to provide a single point of access for jobs brokerage activities to support both employers and residents. Since 2007, the brokerage has filled over 50,000 jobs with Newham residents. Our Newham Work has a proven track record of effectively managing and allocating funds for employment and skills development. The systems and processes we have in place are well-established and have consistently delivered positive outcomes for our residents.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>

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Reg19-C-015	Sabina John		Reg19-C-015/003	Inclusive Economy	J4 Delivery CWB and Inclusive Growth						Yes	Yes						Yes	<p>Harnessing the power of the Developers: Where there is a sustained market demand, Businesses will thrive. Hence plan to create a market harnessing the investment power of the suppliers. With an influx of new housing related developments into the borough, the council should consider placing some conditions for developers to be using local labor, local contractors and local suppliers. Developers are required to invest in training local communities in skills. The developers can also form links with our local technical colleges, encouraged to influence the teaching curriculum and provide work placements for students, giving them valuable industry experience. Developers could also be encouraged to take local residents into employment and especially those in temporary and supported accommodations. This strategic planning opportunity should be used by the council to plan, bring together and prepare our local suppliers ,contractors, technical colleges and Supported Housing providers to step up to take advantage of this Business Market and rise up to the mark to meeting the local quotas imposed by the council on Housing Developers. Supported Housing providers can be a key ally in supporting local residents into taking up training and employment opportunities created in this area.</p>		<p>Comment noted.</p> <p>The requirements for achieving inclusive economic growth are set out in Local Plan Policy J4. The policy objective is to secure high quality economic opportunities for the local residents within our borough, which includes seeking developer's contribution on local training and employment including apprenticeship through the planning obligation requirement.</p> <p>The financial contributions will be used to support local training and employment including Our Newham Work. It will be used to support local disadvantaged groups to address barriers to employment and to benefit from employment opportunities created from developments in the borough. This is achieved via a number of support and upskilling mechanisms including activities to deliver job brokerage, employer-led training, construction skills training, apprenticeships, financial wellbeing and employment rights support to name a few.</p> <p>Significant investment has been made by the council and its partners to continue to develop and deliver its employment and skills provision in the borough. Newham Workplace was set up in 2007 to provide a single point of access for jobs brokerage activities to support both employers and residents. Since 2007, the brokerage has filled over 50,000 jobs with Newham residents. Our Newham Work has a proven track record of effectively managing and allocating funds for employment and skills development. The systems and processes we have in place are well-established and have consistently delivered positive outcomes for our residents.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>

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Reg19 -C-016	Balbir Kaur		Reg19-C-016/003	Inclusive Economy	J4 Delivery CWB and Inclusive Growth						Yes	Yes						Yes	<p>Harnessing the power of the Developers: Where there is a sustained market demand, Businesses will thrive. Hence plan to create a market harnessing the investment power of the suppliers. With an influx of new housing related developments into the borough, the council should consider placing some conditions for developers to be using local labor, local contractors and local suppliers. Developers are required to invest in training local communities in skills. The developers can also form links with our local technical colleges, encouraged to influence the teaching curriculum and provide work placements for students, giving them valuable industry experience. Developers could also be encouraged to take local residents into employment and especially those in temporary and supported accommodations. This strategic planning opportunity should be used by the council to plan, bring together and prepare our local suppliers ,contractors, technical colleges and Supported Housing providers to step up to take advantage of this Business Market and rise up to the mark to meeting the local quotas imposed by the council on Housing Developers. Supported Housing providers can be a key ally in supporting local residents into taking up training and employment opportunities created in this area.</p>		<p>Comment noted.</p> <p>The requirements for achieving inclusive economic growth are set out in Local Plan Policy J4. The policy objective is to secure high quality economic opportunities for the local residents within our borough, which includes seeking developer's contribution on local training and employment including apprenticeship through the planning obligation requirement.</p> <p>The financial contributions will be used to support local training and employment including Our Newham Work. It will be used to support local disadvantaged groups to address barriers to employment and to benefit from employment opportunities created from developments in the borough. This is achieved via a number of support and upskilling mechanisms including activities to deliver job brokerage, employer-led training, construction skills training, apprenticeships, financial wellbeing and employment rights support to name a few.</p> <p>Significant investment has been made by the council and its partners to continue to develop and deliver its employment and skills provision in the borough. Newham Workplace was set up in 2007 to provide a single point of access for jobs brokerage activities to support both employers and residents. Since 2007, the brokerage has filled over 50,000 jobs with Newham residents. Our Newham Work has a proven track record of effectively managing and allocating funds for employment and skills development. The systems and processes we have in place are well-established and have consistently delivered positive outcomes for our residents.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>

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Reg19-C-019	Thayalini Kamalakara n		Reg19-C-019/003	Inclusive Economy	J4 Delivery CWB and Inclusive Growth						Yes	Yes						Yes		<p>Harnessing the power of the Developers: Where there is a sustained market demand, Businesses will thrive. Hence plan to create a market harnessing the investment power of the suppliers.</p> <p>With an influx of new housing related developments into the borough, the council should consider placing some conditions for developers to be using local labor, local contractors and local suppliers. Developers are required to invest in training local communities in skills. The developers can also form links with our local technical colleges, encouraged to influence the teaching curriculum and provide work placements for students, giving them valuable industry experience. Developers could also be encouraged to take local residents into employment and especially those in temporary and supported accommodations.</p> <p>This strategic planning opportunity should be used by the council to plan, bring together and prepare our local suppliers ,contractors, technical colleges and Supported Housing providers to step up to take advantage of this Business Market and rise up to the mark to meeting the local quotas imposed by the council on Housing Developers. Supported Housing providers can be a key ally in supporting local residents into taking up training and employment opportunities created in this area.</p>	<p>Comment noted.</p> <p>The requirements for achieving inclusive economic growth are set out in Local Plan Policy J4. The policy objective is to secure high quality economic opportunities for the local residents within our borough, which includes seeking developer's contribution on local training and employment including apprenticeship through the planning obligation requirement.</p> <p>The financial contributions will be used to support local training and employment including Our Newham Work. It will be used to support local disadvantaged groups to address barriers to employment and to benefit from employment opportunities created from developments in the borough. This is achieved via a number of support and upskilling mechanisms including activities to deliver job brokerage, employer-led training, construction skills training, apprenticeships, financial wellbeing and employment rights support to name a few.</p> <p>Significant investment has been made by the council and its partners to continue to develop and deliver its employment and skills provision in the borough. Newham Workplace was set up in 2007 to provide a single point of access for jobs brokerage activities to support both employers and residents. Since 2007, the brokerage has filled over 50,000 jobs with Newham residents. Our Newham Work has a proven track record of effectively managing and allocating funds for employment and skills development. The systems and processes we have in place are well-established and have consistently delivered positive outcomes for our residents.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>

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Reg19 -C-020	Devaki		Reg19-C-020/003	Inclusive Economy	J4 Delivery CWB and Inclusive Growth						Yes	Yes						Yes	<p>Harnessing the power of the Developers: Where there is a sustained market demand, Businesses will thrive. Hence plan to create a market harnessing the investment power of the suppliers. With an influx of new housing related developments into the borough, the council should consider placing some conditions for developers to be using local labor, local contractors and local suppliers. Developers are required to invest in training local communities in skills. The developers can also form links with our local technical colleges, encouraged to influence the teaching curriculum and provide work placements for students, giving them valuable industry experience. Developers could also be encouraged to take local residents into employment and especially those in temporary and supported accommodations. This strategic planning opportunity should be used by the council to plan, bring together and prepare our local suppliers ,contractors, technical colleges and Supported Housing providers to step up to take advantage of this Business Market and rise up to the mark to meeting the local quotas imposed by the council on Housing Developers. Supported Housing providers can be a key ally in supporting local residents into taking up training and employment opportunities created in this area.</p>		<p>Comment noted.</p> <p>The requirements for achieving inclusive economic growth are set out in Local Plan Policy J4. The policy objective is to secure high quality economic opportunities for the local residents within our borough, which includes seeking developer's contribution on local training and employment including apprenticeship through the planning obligation requirement.</p> <p>The financial contributions will be used to support local training and employment including Our Newham Work. It will be used to support local disadvantaged groups to address barriers to employment and to benefit from employment opportunities created from developments in the borough. This is achieved via a number of support and upskilling mechanisms including activities to deliver job brokerage, employer-led training, construction skills training, apprenticeships, financial wellbeing and employment rights support to name a few.</p> <p>Significant investment has been made by the council and its partners to continue to develop and deliver its employment and skills provision in the borough. Newham Workplace was set up in 2007 to provide a single point of access for jobs brokerage activities to support both employers and residents. Since 2007, the brokerage has filled over 50,000 jobs with Newham residents. Our Newham Work has a proven track record of effectively managing and allocating funds for employment and skills development. The systems and processes we have in place are well-established and have consistently delivered positive outcomes for our residents.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>

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Reg19 -C-021	Andy Lambell		Reg19-C-021/003	Inclusive Economy	J4 Delivery CWB and Inclusive Growth						Yes	Yes						Yes		<p>Harnessing the power of the Developers: Where there is a sustained market demand, Businesses will thrive. Hence plan to create a market harnessing the investment power of the suppliers.</p> <p>With an influx of new housing related developments into the borough, the council should consider placing some conditions for developers to be using local labor, local contractors and local suppliers. Developers are required to invest in training local communities in skills. The developers can also form links with our local technical colleges, encouraged to influence the teaching curriculum and provide work placements for students, giving them valuable industry experience. Developers could also be encouraged to take local residents into employment and especially those in temporary and supported accommodations.</p> <p>This strategic planning opportunity should be used by the council to plan, bring together and prepare our local suppliers ,contractors, technical colleges and Supported Housing providers to step up to take advantage of this Business Market and rise up to the mark to meeting the local quotas imposed by the council on Housing Developers. Supported Housing providers can be a key ally in supporting local residents into taking up training and employment opportunities created in this area.</p>	<p>Comment noted.</p> <p>The requirements for achieving inclusive economic growth are set out in Local Plan Policy J4. The policy objective is to secure high quality economic opportunities for the local residents within our borough, which includes seeking developer's contribution on local training and employment including apprenticeship through the planning obligation requirement.</p> <p>The financial contributions will be used to support local training and employment including Our Newham Work. It will be used to support local disadvantaged groups to address barriers to employment and to benefit from employment opportunities created from developments in the borough. This is achieved via a number of support and upskilling mechanisms including activities to deliver job brokerage, employer-led training, construction skills training, apprenticeships, financial wellbeing and employment rights support to name a few.</p> <p>Significant investment has been made by the council and its partners to continue to develop and deliver its employment and skills provision in the borough. Newham Workplace was set up in 2007 to provide a single point of access for jobs brokerage activities to support both employers and residents. Since 2007, the brokerage has filled over 50,000 jobs with Newham residents. Our Newham Work has a proven track record of effectively managing and allocating funds for employment and skills development. The systems and processes we have in place are well-established and have consistently delivered positive outcomes for our residents.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>

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Reg19 -C-024	Just Homes Charity		Reg19-C-024/003	Inclusive Economy	J4 Delivery CWB and Inclusive Growth						Yes	Yes						Yes	<p>Harnessing the power of the Developers: Where there is a sustained market demand, Businesses will thrive. Hence plan to create a market harnessing the investment power of the suppliers. With an influx of new housing related developments into the borough, the council should consider placing some conditions for developers to be using local labor, local contractors and local suppliers. Developers are required to invest in training local communities in skills. The developers can also form links with our local technical colleges, encouraged to influence the teaching curriculum and provide work placements for students, giving them valuable industry experience. Developers could also be encouraged to take local residents into employment and especially those in temporary and supported accommodations. This strategic planning opportunity should be used by the council to plan, bring together and prepare our local suppliers ,contractors, technical colleges and Supported Housing providers to step up to take advantage of this Business Market and rise up to the mark to meeting the local quotas imposed by the council on Housing Developers. Supported Housing providers can be a key ally in supporting local residents into taking up training and employment opportunities created in this area.</p>		<p>Comment noted.</p> <p>The requirements for achieving inclusive economic growth are set out in Local Plan Policy J4. The policy objective is to secure high quality economic opportunities for the local residents within our borough, which includes seeking developer's contribution on local training and employment including apprenticeship through the planning obligation requirement.</p> <p>The financial contributions will be used to support local training and employment including Our Newham Work. It will be used to support local disadvantaged groups to address barriers to employment and to benefit from employment opportunities created from developments in the borough. This is achieved via a number of support and upskilling mechanisms including activities to deliver job brokerage, employer-led training, construction skills training, apprenticeships, financial wellbeing and employment rights support to name a few.</p> <p>Significant investment has been made by the council and its partners to continue to develop and deliver its employment and skills provision in the borough. Newham Workplace was set up in 2007 to provide a single point of access for jobs brokerage activities to support both employers and residents. Since 2007, the brokerage has filled over 50,000 jobs with Newham residents. Our Newham Work has a proven track record of effectively managing and allocating funds for employment and skills development. The systems and processes we have in place are well-established and have consistently delivered positive outcomes for our residents.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>



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Reg19 -C-025	Gabriel Ogunkoya		Reg19-C-025/003	Inclusive Economy	J4 Delivery CWB and Inclusive Growth						Yes	Yes						Yes		<p>Harnessing the power of the Developers: Where there is a sustained market demand, Businesses will thrive. Hence plan to create a market harnessing the investment power of the suppliers.</p> <p>With an influx of new housing related developments into the borough, the council should consider placing some conditions for developers to be using local labor, local contractors and local suppliers. Developers are required to invest in training local communities in skills. The developers can also form links with our local technical colleges, encouraged to influence the teaching curriculum and provide work placements for students, giving them valuable industry experience. Developers could also be encouraged to take local residents into employment and especially those in temporary and supported accommodations.</p> <p>This strategic planning opportunity should be used by the council to plan, bring together and prepare our local suppliers ,contractors, technical colleges and Supported Housing providers to step up to take advantage of this Business Market and rise up to the mark to meeting the local quotas imposed by the council on Housing Developers. Supported Housing providers can be a key ally in supporting local residents into taking up training and employment opportunities created in this area.</p>	<p>Comment noted.</p> <p>The requirements for achieving inclusive economic growth are set out in Local Plan Policy J4. The policy objective is to secure high quality economic opportunities for the local residents within our borough, which includes seeking developer's contribution on local training and employment including apprenticeship through the planning obligation requirement.</p> <p>The financial contributions will be used to support local training and employment including Our Newham Work. It will be used to support local disadvantaged groups to address barriers to employment and to benefit from employment opportunities created from developments in the borough. This is achieved via a number of support and upskilling mechanisms including activities to deliver job brokerage, employer-led training, construction skills training, apprenticeships, financial wellbeing and employment rights support to name a few.</p> <p>Significant investment has been made by the council and its partners to continue to develop and deliver its employment and skills provision in the borough. Newham Workplace was set up in 2007 to provide a single point of access for jobs brokerage activities to support both employers and residents. Since 2007, the brokerage has filled over 50,000 jobs with Newham residents. Our Newham Work has a proven track record of effectively managing and allocating funds for employment and skills development. The systems and processes we have in place are well-established and have consistently delivered positive outcomes for our residents.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>

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Reg19 -C-026	Alister Probert		Reg19-C-026/003	Inclusive Economy	J4 Delivery CWB and Inclusive Growth						Yes	Yes						Yes		<p>Harnessing the power of the Developers: Where there is a sustained market demand, Businesses will thrive. Hence plan to create a market harnessing the investment power of the suppliers.</p> <p>With an influx of new housing related developments into the borough, the council should consider placing some conditions for developers to be using local labor, local contractors and local suppliers. Developers are required to invest in training local communities in skills. The developers can also form links with our local technical colleges, encouraged to influence the teaching curriculum and provide work placements for students, giving them valuable industry experience. Developers could also be encouraged to take local residents into employment and especially those in temporary and supported accommodations.</p> <p>This strategic planning opportunity should be used by the council to plan, bring together and prepare our local suppliers ,contractors, technical colleges and Supported Housing providers to step up to take advantage of this Business Market and rise up to the mark to meeting the local quotas imposed by the council on Housing Developers. Supported Housing providers can be a key ally in supporting local residents into taking up training and employment opportunities created in this area.</p>	<p>Comment noted.</p> <p>The requirements for achieving inclusive economic growth are set out in Local Plan Policy J4. The policy objective is to secure high quality economic opportunities for the local residents within our borough, which includes seeking developer's contribution on local training and employment including apprenticeship through the planning obligation requirement.</p> <p>The financial contributions will be used to support local training and employment including Our Newham Work. It will be used to support local disadvantaged groups to address barriers to employment and to benefit from employment opportunities created from developments in the borough. This is achieved via a number of support and upskilling mechanisms including activities to deliver job brokerage, employer-led training, construction skills training, apprenticeships, financial wellbeing and employment rights support to name a few.</p> <p>Significant investment has been made by the council and its partners to continue to develop and deliver its employment and skills provision in the borough. Newham Workplace was set up in 2007 to provide a single point of access for jobs brokerage activities to support both employers and residents. Since 2007, the brokerage has filled over 50,000 jobs with Newham residents. Our Newham Work has a proven track record of effectively managing and allocating funds for employment and skills development. The systems and processes we have in place are well-established and have consistently delivered positive outcomes for our residents.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>

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Reg19 -C-030	Aslam Virk		Reg19-C-030/003	Inclusive Economy	J4 Delivery CWB and Inclusive Growth						Yes	Yes						Yes		<p>Harnessing the power of the Developers: Where there is a sustained market demand, Businesses will thrive. Hence plan to create a market harnessing the investment power of the suppliers.</p> <p>With an influx of new housing related developments into the borough, the council should consider placing some conditions for developers to be using local labor, local contractors and local suppliers. Developers are required to invest in training local communities in skills. The developers can also form links with our local technical colleges, encouraged to influence the teaching curriculum and provide work placements for students, giving them valuable industry experience. Developers could also be encouraged to take local residents into employment and especially those in temporary and supported accommodations.</p> <p>This strategic planning opportunity should be used by the council to plan, bring together and prepare our local suppliers ,contractors, technical colleges and Supported Housing providers to step up to take advantage of this Business Market and rise up to the mark to meeting the local quotas imposed by the council on Housing Developers. Supported Housing providers can be a key ally in supporting local residents into taking up training and employment opportunities created in this area.</p>	<p>Comment noted.</p> <p>The requirements for achieving inclusive economic growth are set out in Local Plan Policy J4. The policy objective is to secure high quality economic opportunities for the local residents within our borough, which includes seeking developer's contribution on local training and employment including apprenticeship through the planning obligation requirement.</p> <p>The financial contributions will be used to support local training and employment including Our Newham Work. It will be used to support local disadvantaged groups to address barriers to employment and to benefit from employment opportunities created from developments in the borough. This is achieved via a number of support and upskilling mechanisms including activities to deliver job brokerage, employer-led training, construction skills training, apprenticeships, financial wellbeing and employment rights support to name a few.</p> <p>Significant investment has been made by the council and its partners to continue to develop and deliver its employment and skills provision in the borough. Newham Workplace was set up in 2007 to provide a single point of access for jobs brokerage activities to support both employers and residents. Since 2007, the brokerage has filled over 50,000 jobs with Newham residents. Our Newham Work has a proven track record of effectively managing and allocating funds for employment and skills development. The systems and processes we have in place are well-established and have consistently delivered positive outcomes for our residents.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>

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Reg19-C-031	Santhamalar Mylvakana m		Reg19-C-031/003	Inclusive Economy	J4 Delivery CWB and Inclusive Growth						Yes	Yes						Yes	<p>Harnessing the power of the Developers: Where there is a sustained market demand, Businesses will thrive. Hence plan to create a market harnessing the investment power of the suppliers. With an influx of new housing related developments into the borough, the council should consider placing some conditions for developers to be using local labor, local contractors and local suppliers. Developers are required to invest in training local communities in skills. The developers can also form links with our local technical colleges, encouraged to influence the teaching curriculum and provide work placements for students, giving them valuable industry experience. Developers could also be encouraged to take local residents into employment and especially those in temporary and supported accommodations. This strategic planning opportunity should be used by the council to plan, bring together and prepare our local suppliers ,contractors, technical colleges and Supported Housing providers to step up to take advantage of this Business Market and rise up to the mark to meeting the local quotas imposed by the council on Housing Developers. Supported Housing providers can be a key ally in supporting local residents into taking up training and employment opportunities created in this area.</p>		<p>Comment noted.</p> <p>The requirements for achieving inclusive economic growth are set out in Local Plan Policy J4. The policy objective is to secure high quality economic opportunities for the local residents within our borough, which includes seeking developer's contribution on local training and employment including apprenticeship through the planning obligation requirement.</p> <p>The financial contributions will be used to support local training and employment including Our Newham Work. It will be used to support local disadvantaged groups to address barriers to employment and to benefit from employment opportunities created from developments in the borough. This is achieved via a number of support and upskilling mechanisms including activities to deliver job brokerage, employer-led training, construction skills training, apprenticeships, financial wellbeing and employment rights support to name a few.</p> <p>Significant investment has been made by the council and its partners to continue to develop and deliver its employment and skills provision in the borough. Newham Workplace was set up in 2007 to provide a single point of access for jobs brokerage activities to support both employers and residents. Since 2007, the brokerage has filled over 50,000 jobs with Newham residents. Our Newham Work has a proven track record of effectively managing and allocating funds for employment and skills development. The systems and processes we have in place are well-established and have consistently delivered positive outcomes for our residents.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>

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Reg19 -C-032	Shafiul Ali Akther		Reg19-C-032/003	Inclusive Economy	J4 Delivery CWB and Inclusive Growth						Yes	Yes						Yes		<p>Harnessing the power of the Developers: Where there is a sustained market demand, Businesses will thrive. Hence plan to create a market harnessing the investment power of the suppliers.</p> <p>With an influx of new housing related developments into the borough, the council should consider placing some conditions for developers to be using local labor, local contractors and local suppliers. Developers are required to invest in training local communities in skills. The developers can also form links with our local technical colleges, encouraged to influence the teaching curriculum and provide work placements for students, giving them valuable industry experience. Developers could also be encouraged to take local residents into employment and especially those in temporary and supported accommodations.</p> <p>This strategic planning opportunity should be used by the council to plan, bring together and prepare our local suppliers ,contractors, technical colleges and Supported Housing providers to step up to take advantage of this Business Market and rise up to the mark to meeting the local quotas imposed by the council on Housing Developers. Supported Housing providers can be a key ally in supporting local residents into taking up training and employment opportunities created in this area.</p>	<p>Comment noted.</p> <p>The requirements for achieving inclusive economic growth are set out in Local Plan Policy J4. The policy objective is to secure high quality economic opportunities for the local residents within our borough, which includes seeking developer's contribution on local training and employment including apprenticeship through the planning obligation requirement.</p> <p>The financial contributions will be used to support local training and employment including Our Newham Work. It will be used to support local disadvantaged groups to address barriers to employment and to benefit from employment opportunities created from developments in the borough. This is achieved via a number of support and upskilling mechanisms including activities to deliver job brokerage, employer-led training, construction skills training, apprenticeships, financial wellbeing and employment rights support to name a few.</p> <p>Significant investment has been made by the council and its partners to continue to develop and deliver its employment and skills provision in the borough. Newham Workplace was set up in 2007 to provide a single point of access for jobs brokerage activities to support both employers and residents. Since 2007, the brokerage has filled over 50,000 jobs with Newham residents. Our Newham Work has a proven track record of effectively managing and allocating funds for employment and skills development. The systems and processes we have in place are well-established and have consistently delivered positive outcomes for our residents.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>

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Reg19-E-019	Delia Taasin		Reg19-E-019/004	Building a Fairer Newham	J4 Delivery CWB and Inclusive Growth														<p>Harnessing the power of the Developers: Where there is a sustained market demand, Businesses will thrive. Hence plan to create a market harnessing the investment power of the suppliers.</p> <p>With an influx of new housing related developments into the borough, the council should consider placing some conditions for developers to be using local labor, local contractors and local suppliers. Developers are required to invest in training local communities in skills. The developers can also form links with our local technical colleges, encouraged to influence the teaching curriculum and provide work placements for students, giving them valuable industry experience. Developers could also be encouraged to take local residents into employment and especially those in temporary and supported accommodations.</p> <p>This strategic planning opportunity should be used by the council to plan, bring together and prepare our local suppliers ,contractors, technical colleges and Supported Housing providers to step up to take advantage of this Business Market and rise up to the mark to meeting the local quotas imposed by the council on Housing Developers. Supported Housing providers can be a key ally in supporting local residents into taking up training and employment opportunities created in this area.</p>		<p>Comment noted.</p> <p>The requirements for achieving inclusive economic growth are set out in Local Plan Policy J4. The policy objective is to secure high quality economic opportunities for the local residents within our borough, which includes seeking developer's contribution on local training and employment including apprenticeship through the planning obligation requirement.</p> <p>The financial contributions will be used to support local training and employment including Our Newham Work. It will be used to support local disadvantaged groups to address barriers to employment and to benefit from employment opportunities created from developments in the borough. This is achieved via a number of support and upskilling mechanisms including activities to deliver job brokerage, employer-led training, construction skills training, apprenticeships, financial wellbeing and employment rights support to name a few.</p> <p>Significant investment has been made by the council and its partners to continue to develop and deliver its employment and skills provision in the borough. Newham Workplace was set up in 2007 to provide a single point of access for jobs brokerage activities to support both employers and residents. Since 2007, the brokerage has filled over 50,000 jobs with Newham residents. Our Newham Work has a proven track record of effectively managing and allocating funds for employment and skills development. The systems and processes we have in place are well-established and have consistently delivered positive outcomes for our residents.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>

Reg19 -E-024	Home Builders Federation		Reg19-E- 024/013	Inclusive Economy	J4 Delivery CWB and Inclusive Growth			J4.1c				No			No		<p>J4: Delivering Community Wealth Building and Inclusive Growth</p> <p>Part 1, C is unsound because it is ineffective.</p> <p>Part 1, C requires all major development to provide employment to Newham residents. This is to be achieved, we think, by paying a tariff and providing direct employment (see page 202), although this is unclear from the policy. It is also unclear what is meant by the ‘construction phase’ and ‘end user phase’ although we think we can guess at this.</p> <p>The chief problem with this approach is its narrowness. Employment in construction is never confined to the boundaries of a particular borough, and an employer (housebuilder) cannot guarantee enough work for Newham residents, if that is the Council’s intention. If the Council is not seeking direct employment but is seeking the payment of a tariff towards the provision of general education in the borough then that might fail the tests for planning obligations (now reflected in law through Regulation 122 of the CIL Regulations) – something not directly related to the development, nor, arguably, is it necessary to make the development acceptable in planning terms. We can understand policies that seek applicants to take on X number of trainees, but this policy seems to be trying something else, namely the payment of levy for skills training more generally.</p> <p>Looking at the formula for the levy (if it is indeed a formula to levy a payment from the applicant to the local authority), the figures seem quite high.</p> <p>For example, if we use a really basic example of a £21 million construction build over three years - for ease this works out to £7M per year.</p> <p>19.9 jobs per £1M are estimated so that equates to 139.3 jobs per year = 417.9 over 3 years.</p> <p>Using the formula, 35% of 417.9 = @146 then multiply by £3867 = £564,582 financial contribution.</p> <p>And end user phase will be based on a similar formula - but one assumes that the commercial landlord may pay that and that will depend on how many people occupy the buildings.</p> <p>It would be helpful to know what the financial contributions are used for. We note that Newham Council is part of the Mayors Skills Academy and offers a training brokerage service so it is possible that the financial contributions may go towards funding that initiative (see The Mayor's Construction Academy Hubs   London City Hall). <a href="https://www.london.gov.uk/programmes-strategies/jobs-and-skills/londoners-seeking-employability-skills/mayors-construction-academy-mca/mayors-construction-academy-hubs?ac-2347=2340">[Hyperlink to https://www.london.gov.uk/programmes-strategies/jobs-and-skills/londoners-seeking-employability-skills/mayors-construction-academy-mca/mayors-construction-academy-hubs?ac-2347=2340]</a></p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as this policy approach is to secure developers' contribution to create high quality economic opportunities for the local residents to address Newham's disproportionate levels of poverty and low pay, particularly for some groups, and deliver our inclusive Economy objectives. Both a tariff-based contribution and an employment strategy to secure local high quality economic opportunities are required for all major developments as stated in Policy J4. These obligations work together by ensuring there is a well-supported process to identify, train and support suitable local candidates for the roles prioritised for local residents.</p> <p>Within the context of this policy, construction phase refers to the stage from site preparation to completion and handover, while end user phase refers to the period that the floorspace is occupied by end users after the construction phase.</p> <p>A tariff-based contribution for local training and employment in both construction and end-user stage was previously found sound and agreed in the adopted local plan and has proved deliverable over the plan period. The financial contribution calculation was tested in the whole plan viability assessment.</p> <p>The financial contributions will be used to support local training and employment including Our Newham Work. It will be used to support local disadvantaged groups to address barriers to employment and to benefit from employment opportunities created from developments in the borough. This is achieved via a number of support and upskilling mechanisms including activities to deliver job brokerage, employer-led training, construction skills training, apprenticeships, financial wellbeing and employment rights support to name a few.</p> <p>Significant investment has been made by the council and its partners to continue to develop and deliver its employment and skills provision in the borough. Newham Workplace was set up in 2007 to provide a single point of access for jobs brokerage activities to support both employers and residents. Since 2007, the brokerage has filled over 50,000 jobs with Newham residents. Our Newham Work has a proven track record of effectively managing and allocating funds for employment and skills development. The systems and processes we have in place are well-established and have consistently delivered positive outcomes for our residents.</p> <p>Also, the Council has previously delivered programme via Our Newham Work under the Mayor Skills Academy but the programme has now ended.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p> <p>However, this policy approach also received comments which raised concerns regarding the lack of flexibility of the policy on viability grounds.</p> <p>The Council recognises the importance of ensuring clarity regarding the flexibility of this requirement, and has therefore made the following wording change: J4.1 Implementation Text</p>
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LB Newham Response		The level and nature of the contribution will be determined at the pre-application stage and prior to the determination of the planning application. <b>Proposals that are not proposing to meet the contribution requirement on viability grounds must meet the requirements of Policy BFN4.</b> which is included in the modification table.
Proposed modifications and explanation		
Representor Comment		
Complies with Duty to Cooperate?		
Consistent with the London Plan?		
Consistent with the NPPF?		
Effective?		
Justified?		
Positively prepared?		
Sound?		
Legally Compliant?		
Implementation text		
Justification		
Clause		
Introduction		
Site allocation		
Policy		
Chapter		
Comment Reference		
Agent		
Representor		
Representation Reference		

Inclusive Economy Comments to the <a href="#">full Regulation 19 Representations</a>																			
Reg19-E-024	Home Builders Federation		Reg19-E-024/014	Inclusive Economy	J4 Delivery CWB and Inclusive Growth			J4.1c				No						<p>We note also the size of the financial contributions. The Council’s viability assessment observes this about the effect of the policy:</p> <p><i>Employment and training contributions: the adopted Local Plan sets a target for financial contributions from developments to fund training initiatives which are equivalent to 35% of construction phase jobs in all types of development and 50% of end user jobs in developments of employment floorspace. At the examination in public, the Council agreed that these targets would be applied flexibly to not excessively affect viability, particularly on schemes with large amounts of commercial floorspace. This requirement is to be incorporated into the emerging Local Plan and we have tested this requirement and also an alternative (lower) contribution of 25% of construction phase jobs and 25% of end user jobs. The average reduction in residual land values resulting from the emerging Local Plan policy equates to 13.3%. However, it should be noted that in some development scenarios tested (where starting residual land values are low), the impact of this policy requirement can be as high as a 53% reduction for emerging policy contributions. Given the wide range of impacts, this policy should continue to be applied on a flexible and ‘subject to viability’ basis, in line with the current approach.</i></p> <p>There are two things to observe from this.</p> <p>First, the Council has tested lower percentages than those specified in the policy. The effect on viability, therefore, will be even greater than the report concludes. The Council is obliged to test its policies properly.</p> <p>Second, these results are far from reassuring, especially when national policy requires that applicants should comply with up-to-date policies (paragraph 58). Only the decision-taker may agree to relaxing policy requirements, and the decision-taker may choose not to do so. This policy, in other words, could become a serious obstacle to residential schemes if the Council chooses not to budge.</p> <p>Third, if the Council is unaware, housebuilders already pay a levy to the Construction Industry Training Board, to support construction training. The Council’s proposed levy, consequently, represents an additional tax on development and the diversion of planning gain from other public policy objectives.</p>	<p>The Council's objective for this policy approach is to secure developers' contribution to create high quality economic opportunities for the local residents to address Newham's disproportionate levels of poverty and low pay, particularly for some groups, and deliver our inclusive Economy objectives. A tariff-based contribution for local training and employment in both construction and end-user stage was previously found sound and agreed in the adopted local plan and has proved deliverable over the plan period. The financial contribution calculation was tested in the whole plan viability assessment.</p> <p>However, the Council recognises the importance of ensuring clarity regarding the flexibility of this requirement, and has therefore made the following wording change: J4.1 Implementation Text The level and nature of the contribution will be determined at the pre-application stage and prior to the determination of the planning application. <b>Proposals that are not proposing to meet the contribution requirement on viability grounds must meet the requirements of Policy BFN4.</b> which is included in the modification table.</p>
Reg19-E-024	Home Builders Federation		Reg19-E-024/017	Inclusive Economy	J4 Delivery CWB and Inclusive Growth			J4.1c				No		No			<p>It would be better if the Council required applicants for major developments to commit to employing a certain number of apprentices from the local population, but allow these people to be drawn from an area that is wider than the borough of Newham. These workers must also be allowed to work on projects outside of the borough. The policy will be non-</p>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the Council's objective for this policy approach is to secure high quality economic opportunities for the local residents within our borough through seeking developer's contribution on local training and employment including apprenticeship through the planning obligation requirement as set out in Local Plan</p>

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																			implementable and ineffective without this.		Policy J4.  The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-024	Home Builders Federation		Reg19-E-024/018	Inclusive Economy	J4 Delivery CWB and Inclusive Growth			J4.1c				No			No				It would also be helpful if the Council would clarify if it would be prepared to offset any financial contribution against an Employment and Skills Plan? Employment and Skills Plans would require developers/contractors to develop and deliver employment and skills training that would include apprenticeships, but also provide other opportunities including employments and Information, Advice and Guidance (IAG) activities.		A change to this policy approach has not been made. The Council's objective for this policy approach is to secure developers' contribution to create high quality economic opportunities for the local residents to address Newham's disproportionate levels of poverty and low pay, particularly for some groups, and deliver our inclusive Economy objectives. Both a tariff-based contribution and an employment strategy to secure local high quality economic opportunities, including apprenticeship are required for all major developments as stated in Policy J4. These obligations work together by ensuring there is a well-supported process to identify, train and support suitable local candidates for the roles prioritised for local residents.  The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-024	Home Builders Federation		Reg19-E-024/019	Inclusive Economy	J4 Delivery CWB and Inclusive Growth			J4.1c				No			No				It is also necessary to challenge the Council as to whether this is a sensible and effective use of development gain compared to other policy goals. Training in construction skills is a sensitive area. HBF is doing considerable work in this field. One of the major problems is the ineffectiveness and poor quality of training provided by construction colleges. Generally speaking, the housebuilding industry is increasingly loathe to direct subsidy towards the FE sector when the dividends are so poor. The Council will no doubt dispute this, but housebuilders are speaking from experience. Even if large sums of money are raised from the development industry, it is far from certain that this will result in effective training and subsequent employment of people by training colleges. Support construction training, but not this way. As stated, it would be much better if the Council specified that applicants should employ a certain number of apprentices.		We did not consider this change to be necessary as the Council's objective for this policy approach is to secure high quality economic opportunities for the local residents within our borough through seeking developer's contribution on local training and employment including apprenticeship through the planning obligation requirement as set out in Local Plan Policy J4.  The council are working closely with the industry including the CITB, developers and their supply chains to address the skills gaps in construction.  The council has built strong partnerships with training providers in the borough and are fortunate to be able to benefit from a local construction skills centre, Build East in Stratford. Training is developed with input from the industry with the contractors attending sessions to ensure direct industry input supported by site experience in the form of work experience, apprenticeships, bootcamps and site visits to name a few.  The Councils jobs brokerage, Our Newham Work has supported the delivery of over 17,000 training courses since May 2007.  The Council is satisfied that the plan remains sound without the proposed changes.

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Reg19-E-085	Omarji Ahmed		Reg19-E-085/10	Inclusive Economy	J4 Delivery CWB and Inclusive Growth						No	No							In light of the above points, I believe the Local Plan is unsound as it does not adequately reflect the needs and demands of the local community, particularly with regard to religious infrastructure. Additionally, it fails to incorporate the diverse infrastructure required to support Newham's multicultural population, and it does not comply with the duty to co-operate as per the requirements of the planning process. I urge the Council to reconsider its approach and engage more deeply with local community groups to ensure the Local Plan is more representative, equitable, and inclusive. <b>[originally against SI1, SI2 and SI3 - taking forward Inclusive economy]</b>	<p>5. Economic Growth and Employment Opportunities</p> <p>o Proposed Modification: The Local Plan should integrate specific targets and strategies for utilizing the development to contribute to local economic growth. This includes ensuring the construction sector benefits from the development and creating local employment opportunities, especially for underrepresented groups.</p> <p>o Reasoning: A well-planned development that prioritizes local employment opportunities will foster economic growth in the area. This also helps build stronger community ties by allowing local residents to benefit directly from the development. By aligning the development with economic goals, the plan becomes more holistic and sound.</p> <p>Conclusion: In summary, these modifications would ensure that the Local Plan is legally compliant and sound by addressing the actual needs of the community, optimizing land use, promoting inclusivity, and contributing to local economic growth. These changes will also ensure that the plan aligns with the values of diversity and sustainability that Newham prides itself on.</p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the requirements for achieving inclusive economic growth are set out in Local Plan Policy J4 to address Newham's disproportionate levels of poverty and low pay, particularly for some groups. The policy objective is to secure high quality economic opportunities for the local residents within our borough, which includes seeking developer's contribution on local training and employment including apprenticeship through the planning obligation requirement.</p> <p>The Community Facilities Needs Assessment 2022 has identified a need for community facilities within the borough. The protection of existing social infrastructure and delivery of new infrastructure to meet the local needs are achieved through the requirements in Policies SI1 and SI2. Policy SI2 sets out that a sufficient supply of community facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational. Policy SI2 requires any new and re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA's will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities.</p> <p>The preparation of the Local Plan follows the duty to cooperate approach under different legislative and national planning policy requirements. The detail engagement process is outlined in the Regulation 18 and Regulation 19 Consultation Reports.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>

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Reg19-E-112	SEGRO	Gerald Eve	Reg19-E-112/022a	Inclusive Economy	J4 Delivery CWB and Inclusive Growth			J4.1c			Blank	No						Blank	SEGRO reiterates the representations made to the Regulation 18 version of the Local Plan (part 5(d)) <b>[see Appended – Regulation 18 Draft Local Plan SEGRO response (on part 1c of the policy)]</b> .		<p>The Council's objective for this policy approach is to secure developers' contribution to create high quality economic opportunities for the local residents to address Newham's disproportionate levels of poverty and low pay, particularly for some groups, and deliver our inclusive Economy objectives. A tariff-based contribution for local training and employment in both construction and end-user stage was previously found sound and agreed in the adopted local plan and has proved deliverable over the plan period. The financial contribution calculation was tested in the whole plan viability assessment.</p> <p>However, the Council recognises the importance of ensuring clarity regarding the flexibility of this requirement, and has therefore made the following wording change: J4.1 Implementation Text The level and nature of the contribution will be determined at the pre-application stage and prior to the determination of the planning application. <b>Proposals that are not proposing to meet the contribution requirement on viability grounds must meet the requirements of Policy BFN4.</b> which is included in the modification table.</p>
Reg19-E-112	SEGRO	Gerald Eve	Reg19-E-112/022b	Inclusive Economy	J4 Delivery CWB and Inclusive Growth			J4.3			Blank	No						Blank	SEGRO reiterates the representations made to the Regulation 18 version of the Local Plan (part 5(d)) <b>[see Appended – Regulation 18 Draft Local Plan SEGRO response (on part 3 of the policy)]</b> .		<p>A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included the additional wording in Glossary and Abbreviation to clarify the definition of 'Green/low carbon Industries'. The Council's response has not changed.</p>

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Reg19-E-173	L&Q		Reg19-E-173/022	Inclusive Economy	J4 Delivery CWB and Inclusive Growth			J4.1c				No							Draft Policy J4.1(c) requires, as a minimum, all major developments with commercial floorspace to secure 35% of all construction phase, and 50% of all end-user phase jobs for Newham residents. Considering L&Q's experience providing construction and apprenticeship jobs on its in-house construction sites, and our experience of managing commercial properties, we are very concerned that these levels are not realistic. In particular, the requirement for end-user phase jobs would likely disincentivise potential tenants from occupying commercial space within new developments, resulting in vacant premises which provide no value to the area. For this reason, it is considered that draft Policy J4.1(c) is not effective. We suggest 20% jobs for Newham residents for both the construction and end-user stages is a more appropriate target.	Suggested amended wording: 'c. as a minimum, all major developments must help Newham residents access high quality employment in the construction or/and end-user stage by providing a tariffbased contribution and an Employment Strategy which <del>secures targets 35 20</del> per cent construction phase (all major developments) and <del>50 per cent</del> end-user phase jobs (for all developments delivering employment floorspace) for Newham residents.'	Comment noted. This comment has been subject to further discussion with L&Q 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.  The Council recognises the importance of ensuring clarity regarding the flexibility of this requirement, and has therefore made the following wording change: J4.1 Implementation Text The level and nature of the contribution will be determined at the pre-application stage and prior to the determination of the planning application. <b>Proposals that are not proposing to meet the contribution requirement on viability grounds must meet the requirements of Policy BFN4.</b> which is included in the modification table.
Reg19-E-178	Royal Docks		Reg19-E-178/032	Inclusive Economy	J4 Delivery CWB and Inclusive Growth						Blank	Blank						Blank	[The comments below and in the attached schedule set out some areas where we feel amendments or additions to the Plan could further support the Council and the RDT's work. In the attached schedule are a series of specific changes which we have organised with reference to the pages and policies of the draft.]  <u>Detailed Comments Schedule:</u> Seeking as a minimum a 35% construction and 50% end-user local employment is very challenging to achieve. It is unclear how a 50% end-user target can be realistically achieved by a developer in practice. What mechanisms does the Council believe are appropriate for a developer of new employment space to oblige a tenant to ensure 50% of their staff are Newham residents? It is unclear what legal and contractual route can achieve this.		A change to this policy approach has not been made. We did not consider this change to be necessary as there is a need for developers to contribute to high quality economic opportunities for the local residents to address Newham's disproportionate levels of poverty and low pay, particularly for some groups, and deliver our inclusive Economy objectives. All major developments are required to submit an employment strategy to secure local employment as stated in Policy J4. Local labour requirements will be secured through S106 agreement, which will require developers to collaborate with Our Newham Work to effectively deliver the local labour provision, as well as to require developers to incorporate the target of local employment into the supplier, contractor and subcontractor contracts with subsequent monitoring obligations.  The Council is satisfied that the plan remains sound without the proposed changes.  However, this policy approach also received comments which raised concerns regarding the lack of flexibility of the policy on viability grounds.  The Council recognises the importance of ensuring clarity regarding the flexibility of this requirement, and has therefore made the following wording change: J4.1 Implementation Text The level and nature of the contribution will be determined at the pre-application stage and prior to the determination of the planning application. <b>Proposals that are not proposing to meet the contribution requirement on viability grounds must meet the requirements of Policy BFN4.</b> which is included in the modification table.

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Reg19-E-178	Royal Docks		Reg19-E-178/033	Inclusive Economy	J4 Delivery CWB and Inclusive Growth						Blank	Blank						Blank	<p>[The comments below and in the attached schedule set out some areas where we feel amendments or additions to the Plan could further support the Council and the RDT’s work. In the attached schedule are a series of specific changes which we have organised with reference to the pages and policies of the draft.]</p> <p><u>Detailed Comments Schedule:</u> The requirement for affordable workspace for at least 15years or in perpetuity is welcome but it may be advisable to require developers to select a workspace provider from an approved list in the same way housing associations are pre-selected. This would help ensure workspace is properly managed and that engagement is required pre-application. It may be appropriate to seek advice from the Creative Land Trust for this policy detail.</p>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the requirement for applicants proposing affordable workspace to demonstrate appropriate delivery details and engagement evidence with workspace providers are outlined in Policy J4. Applicants are expected to engage with the Council's Community Wealth Building team throughout the process and issue a tender for an operator.</p> <p>There is a proven track record of delivering affordable workspace in the borough. A list of organisations currently providing affordable workspace in Newham can be found below: <a href="https://www.newham.gov.uk/business-licensing-regulation/support-businesses/12">https://www.newham.gov.uk/business-licensing-regulation/support-businesses/12</a></p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>
Reg19-E-185	Hadley Property Group	Deloitte	Reg19-E-185/015	Inclusive Economy	J4 Delivery CWB and Inclusive Growth			J4.1c											<p>Inclusive Economy Policy J4: Delivering Community Wealth Building and Inclusive Growth Hadley is supportive of the ambition to provide employment for local residents and seeks to employ local talent where possible. However, Hadley maintains its stance set out in the Regulation 18 representations which sought to remove the local jobs tariff. Hadley strongly feels that on-site provision should be preferred over a financial contribution. Any policy requirement for local labour should seek to secure jobs or require a financial contribution where jobs are not secured on site. Hadley is disappointed that the requirement for 35% construction phase and 50% end user phase jobs to be secured through local employment has not been reduced or removed. Whilst the ambition is recognised, a lower proportion would be considered proportionate and appropriate. Hadley believes that further justification is required as to why Policy J4 proposes a much higher percentage than standard, and if the requirement is not reduced the policy should include flexibility in its application to reflect the circumstances of each development. This high proportion of end user phase may discourage companies working in the borough if they cannot attract the skills and employment to suit their business. Surrounding boroughs such as LB Hackney and LB Tower Hamlets require 25% and 20% local labour, which would be more appropriate.</p>		<p>Comment noted. This comment has been subject to further discussion with Hadley Property Group 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>The Council recognises the importance of ensuring clarity regarding the flexibility of this requirement, and has therefore made the following wording change: J4.1 Implementation Text The level and nature of the contribution will be determined at the pre-application stage and prior to the determination of the planning application. <b>Proposals that are not proposing to meet the contribution requirement on viability grounds must meet the requirements of Policy BFN4.</b> which is included in the modification table.</p>



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Reg19 -E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/048a	Inclusive Economy	J4 Delivery CWB and Inclusive Growth						Blank	No						Blank	Part 1: the viability and deliverability impact of the proposed employment obligations, including contributions, requires a thorough assessment to ensure the approach will not negatively impact on the delivery of affordable housing over the plan period.		<p>Comment noted. This comment has been subject to further discussion with the Silvertown Partnership LLP 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>The Council recognises the importance of ensuring clarity regarding the flexibility of this requirement, and has therefore made the following wording change: J4.1 Implementation Text The level and nature of the contribution will be determined at the pre-application stage and prior to the determination of the planning application. <b>Proposals that are not proposing to meet the contribution requirement on viability grounds must meet the requirements of Policy BFN4.</b> which is included in the modification table.</p>
Reg19 -E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/048b	Inclusive Economy	J4 Delivery CWB and Inclusive Growth						Blank	No						Blank	Part 4: there needs to be consideration of viability impact of potential Affordable Workspace requirements. This is especially important for strategic sites allocated for mixed-use development in regeneration areas such as Silvertown. The appropriateness of the principle seeking affordable workspace in such locations, where workspace would be inherently affordable in a London context and its success would foster community wealth building, is questioned and should be considered.		<p>A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council’s response has not changed.</p>
Reg19 -E-222	Ballymore	Rolfe Judd	Reg19-E-222/18	Inclusive Economy	J4 Delivery CWB and Inclusive Growth														Policy J4: Delivering Community wealth building and inclusive growth Ballymore supports the Council’s ambition to assist with local employment through the construction phase of developments, however, the supporting text outlining ‘Planning Obligations’ requires 35% of construction phase and 50% of end-user phase jobs for Newham residents, based on a tariff based financial contribution of £3,867 per job. It is not clear whether this obligation has been viability tested, but it could lead to a significant financial contribution, particularly for the Council’s Strategic Sites, which may have an impact on the deliverability and viability of a scheme. It should therefore be clear that this contribution is viability tested at the plan-making stage, but also that the policy wording allows for the financial contribution to be viability tested at application stage too.		<p>The Council's objective for this policy approach is to secure developers' contribution to create high quality economic opportunities for the local residents to address Newham's disproportionate levels of poverty and low pay, particularly for some groups, and deliver our inclusive Economy objectives. A tariff-based contribution for local training and employment in both construction and end-user stage was previously found sound and agreed in the adopted local plan and has proved deliverable over the plan period. The financial contribution calculation was tested in the whole plan viability assessment.</p> <p>However, the Council recognises the importance of ensuring clarity regarding the flexibility of this requirement, and has therefore made the following wording change: J4.1 Implementation Text The level and nature of the contribution will be determined at the pre-application stage and prior to the determination of the planning application. <b>Proposals that are not proposing to meet the contribution requirement on viability grounds must meet the requirements of Policy BFN4.</b> which is included in the modification table.</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
Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/18	Inclusive Economy	J4 Delivery CWB and Inclusive Growth														Further, it’s not clear if the financial contribution could be reduced through on-site provision, particularly through the construction phase. Ballymore are experienced at securing local employment and apprenticeships for construction across London, and we strongly feel on-site provision should be preferred over a financial contribution.	Any policy requirement for local labour should therefore seek to secure local jobs or a financial contribution to be paid to the Council as a ‘fall back’ position.	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as both a tariff-based contribution and an employment strategy to secure local high quality economic opportunities are required for all major developments as stated in Policy J4. These obligations work together by ensuring there is a well-supported process to identify, train and support suitable local candidates for the roles prioritised for local residents.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>
Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/19	Inclusive Economy	J4 Delivery CWB and Inclusive Growth														Finally, we consider 35% of construction phase jobs and 50% end-user phase jobs to be secured through local employment to be an excessive requirement, without justification or evidence and a lower proportion would be more appropriate. For reference, LB Tower Hamlets requires 20% of the total jobs created by the construction and end-user phases of new developments for local residents and LB Hackney require 25% local labour.	The proposed requirement of 35% and 50% for the construction and end-user phases, respectively, is therefore considered to be onerous and should be reduced to a more reasonable requirement, more in line with other London Boroughs.	<p>The Council's objective for this policy approach is to secure developers' contribution to create high quality economic opportunities for the local residents to address Newham's disproportionate levels of poverty and low pay, particularly for some groups, and deliver our inclusive Economy objectives. A tariff-based contribution for local training and employment in both construction and end-user stage was previously found sound and agreed in the adopted local plan and has proved deliverable over the plan period. The financial contribution calculation was tested in the whole plan viability assessment.</p> <p>However, the Council recognises the importance of ensuring clarity regarding the flexibility of this requirement, and has therefore made the following wording change: J4.1 Implementation Text The level and nature of the contribution will be determined at the pre-application stage and prior to the determination of the planning application. <b>Proposals that are not proposing to meet the contribution requirement on viability grounds must meet the requirements of Policy BFN4.</b> which is included in the modification table.</p>
Reg19-E-015	Greater London Authority		Reg19-E-015/015a	Inclusive Economy															<p>Industrial capacity</p> <p>Throughout the draft Plan there are many instances where the generic term ‘employment uses’ is used. This term blurs the necessary distinction between industrial, office and other commercial activities and their respective Use Classes. The draft Plan should be amended accordingly so that the distinction is recognised, [with priority given to those vital uses which the borough can control / support which fall outside Use Class E.]</p>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the term 'employment uses' is clearly defined in the Glossary section, which outlines the relevant use classes. 'Employment uses' in this Plan refers only to industrial and office floorspace, and their distinctions clearly set out in both demand analysis and delivery requirements within the Inclusive Economy Policies, as well as in the site allocations identified for delivering employment floorspace. The Council is satisfied that the plan remains sound without the proposed changes.</p> <p>This comment has been subject to further discussion with the GLA. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report.</p>

[illegible]

Nevertheless, floorspace within Class E that serves a critical industrial function or is considered to have a significant impact on changing its use under Use Class MA permitted development right can be controlled and monitored. In appropriate circumstances, the Council will use planning conditions in the development management process to secure industrial floorspace permitted within Class E to restrict its use to those specifically consented within Class E.

However, the Council recognises the importance of ensuring the Plan is positively prepared, justified and effective, and has therefore made the following wording changes:

J1.2 Implementation:  
**All future developments incorporating office (E(g)(i)), research and development (E(g)(ii)) and/or light industrial (E(g)(iii)) floorspace within SILs, LILs, and where necessary and justified within site allocations identified for mixed use or employment-led development will be secured through conditions to limit uses consented within Class E, in order to achieve the objective of this policy.**

Further information on each spatial designation is available in the Employment Land Review (2022) (or subsequent updates) and applicants are expected to discuss their proposals with the council at the earliest opportunity to ensure that they align with the function, character and priority uses of their proposed location.

J3 Implementation (All):  
**Proposals incorporating the replacement and relocation of floorspace within office (E(g)(i)), research and development (E(g)(ii)) and/or light industrial (E(g)(iii)) will be secured through conditions to limit uses consented within Class E, under the following circumstances:**  
- the floorspace to be relocated or replaced is within a SIL or LIL; or  
- the replacement and relocated floorspace is within a SIL or LIL; or  
- the floorspace to be relocated or replaced is located within a site allocation and the relocation and replacement is considered necessary or justified.

Monitoring Framework - Key performance indicator 22:

Target no net loss of floorspace.

~~Monitor for location against designated employment land and non designated employment sites.~~

~~Monitor approvals (gains and loss) and completions.~~  
**Monitor for net change in Use Class B (including general industrial (B2), storage or distribution (B8) (including dark kitchen/ shop and micro fulfilment)), industrial-related Use Class E (including research and development (E(g)(ii)) and light industrial (E(g)(iii))) and office (E(g)(i)) floorspace approved (gains and loss) and completed on Strategic Industrial Locations (SILs), Local Industrial Locations (LILs), site**

LB Newham Response		<b>allocations and other non-designated employment sites.</b>  which are included in the modification table.  This comment has been subject to further discussion with the GLA. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report.
Proposed modifications and explanation		
Representor Comment		
Complies with Duty to Cooperate?		
Consistent with the London Plan?		
Consistent with the NPPF?		
Effective?		
Justified?		
Positively prepared?		
Sound?		
Legally Compliant?		
Implementation text		
Justification		
Clause		
Introduction		
Site allocation		
Policy		
Chapter		
Comment Reference		
Agent		
Representor		
Representation Reference		

Reg19-E-015	Greater London Authority		Reg19-E-015/018	Inclusive Economy															The draft Plan should also include a clear intention to thoroughly monitor industrial capacity over the life of the Plan to be consistent with the approach in Policy E4C of the LP2021. This should include a focus on monitoring Class B uses to ensure this type of capacity is increased to meet established identified need. Monitoring should be set against the evidence of potential capacities established in the evidence for specific industrial sites.		<p>The Council's objective for this policy approach is to ensure sufficient supply of industrial capacity in Newham while maintaining flexibility in land use classification in employment sites and site allocations. The aggregated categorisation of Class B and Class E(g) industrial floorspace is effective in addressing Newham's needs, as the industrial premises in the borough accommodate a wide variety of industrial occupier profiles, as informed by the Employment Land Review 2022.</p> <p>This is primarily because the light industrial floorspace which accommodate activities that are genuinely light enough to be undertaken in a residential environment overlaps with office spaces, while the vast majority of the existing light industrial units are still located in established industrial estates due to operational requirements such as the storage and servicing of light goods vehicles. There is no clear evidence that these existing floorspace can be relocated outside designated industrial locations to serve the occupier's operational needs. This finding is supported by additional work undertaken by the Council to review Class E industrial floorspace completions in the borough, which reiterates the findings of the aggregated methodology in the Employment Land Review (2022).</p> <p>We considered the current approach is in conformity with the London Plan. London Plan Policies E4 - E7 set out the range of industrial uses acceptable in Strategic Industrial Locations, Locally Significant Industrial Sites (equivalent to Local Industrial Locations in this Plan) and non-designated industrial sites. This includes Class B uses, as well as research and development floorspace (Class E(g)(ii)/B1b) and light industrial floorspace (Class E(g)(iii)/B1c), with no prioritisation over particular use classes in relevant policies. In other words, the London Plan actively encourages Class E industrial floorspace within protected employment land in the same way as it does for Class B floorspace. As set out in Local Plan Policy J1, Class E(g) industrial floorspace is directed to both non-designated and designated employment sites including SILs and LILs, and all proposals within SILs or LILs for office E(g)(i) floorspace is required to be ancillary to the industrial function. As such, our approach is considered in line with the approach in the London Plan to promote industrial supply.</p> <p>Further analysis has identified that the scale of E(g)(iii) class activity in Newham is insignificant compared to the overall industrial market. Data including the GLA Industrial Land Supply Study 2023, the Council's completion data and a view derived from Standard Industrial Classification (SIC) have been analysed, concluding that the share of light industrial activity in Newham is around 15% of the overall industrial demand. Taking into account the insignificant share of the light industrial market in Newham and the low likelihood of current occupiers relocating from industrial estates, as discussed above, it is concluded that the loss of Class E space through Use Class MA permitted development rights will not have a detrimental impact on the overall industrial supply in the borough.</p>
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Nevertheless, floorspace within Class E that serves a critical industrial function or is considered to have a significant impact on changing its use under Use Class MA permitted development right can be controlled and monitored. In appropriate circumstances, the Council will use planning conditions in the development management process to secure industrial floorspace permitted within Class E to restrict its use to those specifically consented within Class E.

However, the Council recognises the importance of ensuring the Plan is positively prepared, justified and effective, and has therefore made the following wording changes:

J1.2 Implementation:  
**All future developments incorporating office (E(g)(i)), research and development (E(g)(ii)) and/or light industrial (E(g)(iii)) floorspace within SILs, LILs, and where necessary and justified within site allocations identified for mixed use or employment-led development will be secured through conditions to limit uses consented within Class E, in order to achieve the objective of this policy.**

Further information on each spatial designation is available in the Employment Land Review (2022) (or subsequent updates) and applicants are expected to discuss their proposals with the council at the earliest opportunity to ensure that they align with the function, character and priority uses of their proposed location.

J3 Implementation (All):  
**Proposals incorporating the replacement and relocation of floorspace within office (E(g)(i)), research and development (E(g)(ii)) and/or light industrial (E(g)(iii)) will be secured through conditions to limit uses consented within Class E, under the following circumstances:**  
- the floorspace to be relocated or replaced is within a SIL or LIL; or  
- the replacement and relocated floorspace is within a SIL or LIL; or  
- the floorspace to be relocated or replaced is located within a site allocation and the relocation and replacement is considered necessary or justified.

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~~Monitor for location against designated employment land and non-designated employment sites.~~

~~Monitor approvals (gains and loss) and completions.~~  
**Monitor for net change in Use Class B (including general industrial (B2), storage or distribution (B8) (including dark kitchen/ shop and micro fulfilment)), industrial-related Use Class E (including research and development (E(g)(ii)) and light industrial (E(g)(iii))) and office (E(g)(i)) floorspace approved (gains and loss) and completed on Strategic Industrial Locations (SILs), Local Industrial Locations (LILs), site**



LB Newham Response		<p><b>allocations and other non-designated employment sites.</b></p> <p>which are included in the modification table.</p> <p>This comment has been subject to further discussion with the GLA. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report.</p>
Proposed modifications and explanation		
Representor Comment		
Complies with Duty to Cooperate?		
Consistent with the London Plan?		
Consistent with the NPPF?		
Effective?		
Justified?		
Positively prepared?		
Sound?		
Legally Compliant?		
Implementation text		
Justification		
Clause		
Introduction		
Site allocation		
Policy		
Chapter		
Comment Reference		
Agent		
Representor		
Representation Reference		

Reg19 -E-015	Greater London Authority		Reg19-E- 015/019	Inclusive Economy				SIL2											<p>The draft Plan proposes to reconfigure some of its designated industrial land. The most significant of which is the proposed intention to release the southern part of the British Gas / Cody Road SIL. However, this will be offset by the proposed designation of new SIL on an adjacent site at Bidder Street. The reconfiguration would result in a net gain of 0.26ha of SIL. For this reason, the proposed reconfiguration appears to be acceptable but should focus on accommodating Class B uses.</p>		<p>We welcome your support for our broad approach to the land swap proposal. The British Gas/ Cody Road SIL, along with the land swap site within the proposed SIL boundary, will be prioritised for large scale industrial uses as outlined in Table 6 in Policy J1 to address the borough's industrial capacity needs as identified in the Employment Land Review 2022. These will be primarily delivered within Cass B floorspace. Any proposals incorporating employment floorspace that deviate from the priority uses in Policy J1 will need to be sufficiently justified by evidence of market demand at this location.</p> <p>We do not consider any change are required to focus on accommodating B uses at this location as we consider our policy approach to be positively prepared, justified and effective to ensure sufficient supply of industrial capacity in Newham while maintaining flexibility in land use classification in Strategic Industrial Locations. In addition to the priority uses table, our employment policies direct both Class B and Class E(g) industrial floorspace to Strategic Industrial Locations, which is effective in addressing Newham's needs, as the industrial premises in the borough accommodate a wide variety of industrial occupier profiles, as informed by the Employment Land Review 2022. Further analysis shows that the vast majority of light industrial spaces in Newham are located within established industrial estates and there is no evidence that they can be relocated elsewhere due to their operational needs. In addition, the scale of E(g)(iii) class activity in Newham is shown to be insignificant compared to the overall industrial market. Nevertheless, floorspace within Class E that serves a critical industrial function or is considered to have a significant impact on changing its use under Use Class MA permitted development right can be controlled and monitored through using planning conditions in the development management process.</p> <p>The current approach is in conformity with the London Plan. London Plan Policies E4 and E5 set out the range of industrial uses acceptable in Strategic Industrial Locations, which includes Class B uses but also research and development floorspace (Class E(g)(ii)/B1b) and light industrial floorspace (Class E(g)(iii)/B1c) with no prioritisation over particular use classes.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p> <p>This comment has been subject to further discussion with the GLA. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report.</p>
Reg19 -E-015	Greater London Authority		Reg19-E- 015/020	Inclusive Economy				Sugar House Lane											<p>LBN intend to release Sugar House Lane / Stratford High Street LSIS from its industrial designation through the draft Plan and this should be made clearer. If there is existing Use Class B capacity within the area this should be monitored and reprovided or maintained.</p>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as it is clear in the site allocation wording that the employment uses should meet requirements as set out in Local Plan Policy J1 and should deliver the same quantity of employment uses as the permitted scheme. The approach to employment floorspace within the permitted proposal was broadly supported by the GLA as outlined in the GLA Stage II Report.</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>Existing industrial capacity at the site is protected by Local Plan Policy J3 which requires site allocations to reprovide employment floorspace for existing businesses or submit a Relocation Strategy demonstrating reasonable endeavours to relocate existing businesses.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p> <p>This comment has been subject to further discussion with the GLA. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report.</p>
Reg19-E-027	B&Q Limited	RPS	Reg19-E-027/09	Inclusive Economy				J1.2b			Blank	No	No	No	No	No		Blank	<p>The inclusion of part (b) of Policy J1 is based on a one-sided assessment of the evidence base, relying on the need for employment accommodation in the Employment Land Review. There is no counter balancing assessment of the need for retail space, particularly the need for additional retail space if existing accommodation is lost as part of the spatial strategy for the district.</p> <p>In many instances, the retail parks in the borough are not designated as employment land are relied upon by the spatial strategy for retail development as meeting the expenditure/floorspace requirements of the borough.</p> <p>We consequently object to the inclusion of Part b of Policy J1 as it is not positively prepared, is not justified by the evidence base, would not provide an effective means of meeting the competing demands of development types in the borough and is not consistent with national policy.</p>	<p>Policy J1.b: Employment and growth needs to be amended through the deletion of Part b of the policy as follows:</p> <p><del>b. In addition to the locations identified above, the development of industrial uses for research and development (E(g)(ii)), light industrial (E(g)(iii)), general industrial (B2), storage or distribution (B8) (including dark kitchen/shop and micro fulfilment) and industrial related sui generis (SG) uses (including waste, utilities including digital/data and transport depots) may be located on retail and leisure parks with good accessibility to the Strategic Road Network.</del></p>	<p>This wording change has not been made. We did not consider this change to be necessary as the Plan uses employment and town centre designations and site allocations to steer economic development to appropriate locations. This policy is positively prepared and justified as it supports the Plan’s identified need for further industrial land and town centre first approach, supported by the Employment Land Review 2022 and Retail and Leisure Study 2022. The Council is satisfied that the plan remains sound without the proposed changes.</p>

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Reg19-E-047	Bilal Mir		Reg19-E-047/003	Inclusive Economy							No	No						No		<p>4. Economic and Employment Opportunities The site offers substantial potential for driving economic growth within the construction sector and creating local job opportunities. However, we have concerns that the proposed key route has not been sufficiently reviewed to align with the potential for housing and economic development. We recommend a detailed examination of this aspect to ensure it supports both housing and economic goals effectively.</p> <p>[originally against Policy N7 SA1 - taking forward as Inclusive Economy]</p>	<p>A change to this policy has not been made. We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan’s desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process.</p> <p>The site allocation enables the creation of local employment opportunity in the construction sector as local employment during the construction phase will be secured through the planning obligation requirement as set out in Local Plan Policy J4. In general, economic growth in the borough will be achieved by protecting and providing employment floorspace at the designated employment locations in the borough which these locations are informed by the Employment Land Review 2022. However, there is flexibility for employment floorspace to come forward outside the designated employment locations if the criteria listed under Local Plan Policy J2 are met.</p> <p>The Council is satisfied that the plan is sound without the proposed changes.</p>
Reg19-E-081	Metropolitan Police Service - Designing Out Crime		Reg19-E-081/009	Inclusive Economy							Blank	Blank						Blank	<p>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]</p>	<p>[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).]</p>	<p>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.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/099	Inclusive Economy															No comment.		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19 -E-100	Simpson and Goldstein	Lichfields	Reg19-E-100/006	Inclusive Economy				LMUA6			Yes	No						Yes	In addition to this, S&G consider that the policy should clarify what is meant by employment led. Our understanding is that employment led means meeting the viable/optimal employment needs first, with other uses fitting around this, rather than a scheme of predominantly employment floorspace. This is currently unclear in the policy wording. Therefore, the policy should clarify that an appropriate quantum of employment floorspace should be provided.		<p>The comment you have provided has not resulted in a change. We did not consider this change to be necessary as the current wording in Policy J1 and the Glossary clearly set out the requirements for employment-led developments to first meet employment needs and then other uses to be fitted around it. The Council is satisfied that the Plan remains sound without the proposed changes.</p> <p>However, this policy approach also received comments which raised concerns regarding the need to clarify the terminology 'employment-led' development as suitable for solely employment use. The Council recognised the importance of ensuring the Plan is of clarity and has therefore made the following wording changes to Local Plan Policy J1 and the Glossary:</p> <p>J1 Implementation Text: Employment-led development is required to first meet employment needs (including the viable operation of employment uses on the site and where relevant, adjacent sites) in any design, and then other uses such as residential can be fitted around it. <b>Employment-led development can consist of employment only development but must still demonstrate that the employment needs at the site are being met.</b></p> <p>Glossary: Employment-led development: Employment-led development requires schemes to first meet employment needs (including the viable operation of employment <del>generating</del> uses on the site and where relevant, adjacent sites) in any design, and then other uses such as residential to be fitted around it. <b>Employment-led development can consist of employment only development but must still demonstrate that the employment needs at the site are being met.</b> which are included in the modification table.</p>
Reg19 -E-100	Simpson and Goldstein	Lichfields	Reg19-E-100/007	Inclusive Economy				LMUA6			Yes	No						Yes	Residential Use The minor adjustments to the wording of draft Policy J1 and J2, particularly regarding the approach to co-location on different employment sites, are welcomed. The continued reference to 'support' for residential development at the Site (in Table 8) is broadly supported. However, given the objectives of the plan, particularly objective 5 (Homes for residents), and draft Policy BFN1 (Spatial strategy) part 1. b which directs growth and homes to Plaistow, S&G continue to consider this should be strengthened to actively promote residential and associated uses in this location.	We strongly urge LBN to revise the wording to <b>“Employment-led co-location with residential development (and associated quasi-residential uses) is supported”</b> . This would strengthen the support for residential uses on the Site and ensure the policy is positively prepared and futureproofed in terms of the forthcoming changes to the NPPF.	This wording change is not supported. We did not consider this change to be necessary as the current wording in Policy J1 and the Glossary clearly outline the requirements for employment-led developments to first meet employment needs, with other uses to be incorporated around it. This site is designated for the protection of its employment function, with a variety of existing employment uses and the potential for industrial intensification in form of small, stacked industrial unites in the future as informed by the Employment Land Review (2022). The opportunity for delivering mixed use and residential use at this site in form of employment-led development is recognised and supported in the Plan. The Council is satisfied that the Plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-100	Simpson and Goldstein	Lichfields	Reg19-E-100/008	Design				LMUA6			Yes	No						Yes	The Site is highly accessible and continues to be located in a character area, defined by the updated Newham Characterisation Study (2024), as not being sensitive to change and able to support a moderate uplift in density in areas of fragmented character. It is also located directly opposite the Plaistow North Strategic Site (N9.SA1) which is still considered a transformation area capable of establishing a future centre around the station as set out in the updated Newham Characterisation Study (2024).		Comment noted.

Reg19 -E-102	Network Rail		Reg19-E- 102/014	Inclusive Economy				SIL6			Blank	No					Blank	<p>[NR welcomes the support and commitments detailed within the draft Local Plan and Site Allocations for improvements to railway infrastructure and public transport, particularly at Stratford Station and West Ham Station. NR looks forward to continuing to work closely with the London Borough of Newham to ensure the required railway infrastructure improvements can be successfully delivered.</p> <p>Nevertheless, there are a number of outstanding matters that NR believes need to be addressed for the Local Plan to be found sound. Please refer to Appendix 1 and Appendix 2 to view NR’s feedback on these matters.]</p> <p>Appendix 2: Network Rail’s feedback on matters relating to Bow Goods Yard</p> <p>Bow Goods Yard</p> <p>Bow Goods Yard comprises 12.3ha of brownfield industrial land, primarily used for rail freight, the storage and processing of aggregates and concrete batching. The Site is split into two areas; Bow East which covers and area of 8.9ha and Bow West which covers 3.4ha. The whole Bow Goods Yard Site is located within the administrative authority of LLDC which was established in 2012. However, the LLDC’s Town Planning powers will return to the relevant boroughs on 01 December 2024 upon which the relevant Local Planning Authorities will regain their Town Planning powers. The relevant Local Planning Authorities will become the London Borough of Newham (LBN) and the London Borough of Tower Hamlets (LBTH). Bow East (the portion of the Site located to the east of the River Lea) falls within the LBN and Bow West falls within LBTH.</p> <p>An Outline Planning Application was submitted to the LLDC on 18 April 2024, following extensive pre-application discussions with the LLDC, key stakeholders (including the LBN, LBTH and GLA) and the local community. The Application is seeking permission for up to 190,000sqm (GEA) of industrial, employment and leisure uses at the site. Under the London Plan and adopted / emerging Newham Local Plan, the Site is allocated as Strategic Industrial Land. The Site is one of the Capital’s largest strategic railheads, supplying over a million tonnes of concrete and aggregate to serve the construction industry. However, the Site is inefficiently utilised and given the scarcity of brownfield land within London, it presents an excellent opportunity for industrial intensification which will significantly increase the level of employment currently generated on the Site.</p> <p>Consideration of the Regulation 19 Local Plan</p> <p>Outlined below are our comments pertaining to the soundness of the Council’s Regulation 19 Local Plan in relation to Bow Goods Yard.</p>	Comment noted.
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Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/039	Inclusive Economy															7 Inclusive Economy 7.1 St William continues to support LBNS overarching approach to their economic future through Community Wealth Building and will continue to support its intention to building a fair economy which secures social, economic and environmental benefits for all.		Support noted.
Reg19-E-203	GLP (International Business Park, Rick Roberts Way)	Quod	Reg19-E-203/014	General															<b>[Please see Appendix 2 of representation]</b> The representations submitted in 2023 on behalf of GLP offered broad support of the Regulation 18 Draft Local Plan and its policy aims. The policy aims recognised the need for making the most efficient use of land. For the Site, this was via the means of intensification through redevelopment to deliver net increases in new economic and employment floorspace. The representations offered specific support for paragraph J2.1 which required industrial intensification to explore the scope for multi-deck development as a priority. However, the Regulation 18 representations highlighted that LB Newham’s pipeline of supply was not sufficient to meet the borough’s office and industrial needs. Further, the sites with industrial potential were not subject to a planning application at the time of the Regulation 18 Consultation.		Comment noted.

Reg19 -E-231	IDM Properties LLP	Iceni Projects	Reg19-E- 231/002	Inclusive Economy					LMUA9			Yes	No					Yes	<div>The Site</div> <div>The site is outlined in Figure 1 <a href="#">[see Figure 1: The Site, Newham Employment Land Review 2022, Canning Road LMUA at p.2]</a> and is located within the west of LB Newham. A Site Location Plan is also enclosed with this submission. The site is to the west of Canning Road and forms a hard landscaped car park with both GTEC House and Channelsea House. Channelsea House is a former 1970s 6-storey office building, which was converted into residential use via prior approval in 2014, providing 72 residential units (LPA ref. 14/02907/PRECUJ). The surrounding area is mixed use in nature, with residential use to the east, industrial uses to the west, and vacant brownfield sites. The site also contains two office units. These office units have been vacant and empty since the completion of the conversion works to Channelsea House in 2016. Active marketing has been carried out for an 8-year period by Alexander Reece Thomson, with no interest in this office space. The site is not within a Conservation Area and there are no listed buildings on site, however is in proximity to the following nearby designated heritage assets within the setting of the following:<ul style="list-style-type: none"><li>• Grade II Listed Engine House</li><li>• Grade II Listed West Ham Pumping Station</li></ul>The stie has very good transport links, benefiting from PTAL 6a. It is less than a 10 minute’s walk to both West Ham and Abbey Lane station, and the Greenway lies adjacent to the site, providing pedestrian and cycle routes towards the Olympic Park and Stratford central.</div> <div>The following Planning History is relevant to these Representations: <a href="#">[information below extracted from table at p.2]</a> <u>Application ref.</u> 14/01858/PRECUJ <u>Description</u> Prior Approval for a change of use of existing Class B1 (Office) part basement, part ground, and entire first, second, third, fourth and fifth floors of Channelsea House to Class C3(residential) to create 51 residential units (20 x studios and 31 x 1bed units) <u>Status</u> Application granted 01.05.14</div> <div><u>Application ref.</u> 14/02527/PRECUJ <u>Description</u> Prior Approval for a change of use of existing Class B1 (Office) part basement, part ground, and entire first, second, third, fourth and fifth floors of Channelsea House to Class C3(residential) to create 51 residential units. <u>Status</u> Application granted 19.12.14</div> <div><u>Application ref.</u> 14/02571/PRECUJ <u>Description</u> Prior Approval for a change of use of existing Class B1 (Office) part basement,</div>	Comment noted.
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Reg19-E-240	West Ham United Football Club	PMV Planning	Reg19-E-240/002	Inclusive Economy							Blank	Blank						Blank	Furthermore, in support of the Borough’s inclusive economy strategy, West Ham United has been at the forefront of the development and the collaboration of the third sector across Newham. Representatives from the Foundation have taken a leadership approach within groups such as: One Newham - a partnership network for the voluntary, community and faith sector consisting of 150 local organisations, and Newham Homeless Forum – with 19 organisations working together to share service provisions, assist each other and combat homelessness.		Comment noted.