

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-024	Home Builders Federation		Reg19-E-024/010	High Street	HS1 Town Centre Network			1				No					No		<p>HS1: Newham’s Town Centres Network</p> <p>Part 1 is unsound because it is contrary to the London Plan.</p> <p>Part 1 states that all homes in Newham should be within a maximum 400 metre radius of at least one designated centre or parade or be within a 15-minute walking distance of at least two designated centres or parades.</p> <p>This is a stricter, and more restrictive, policy than the London Plan. The London Plan specifies that residential development should be supported where it is within 800 metres of a train station or town centre boundary, or within PTAL areas 3-6. This principle is articulated by London Plan policy GG2: Making the best use of land, but especially Policy H1: Increasing Housing Supply, part 2. Part 2, a) specifically refers to the suitability of:</p> <p><i>sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station39 or town centre boundary.</i></p> <p>The rest of part 2 of policy H1 also refers to other circumstances where housing should be encouraged, and we quote in full:</p> <p><i>a) sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station39 or town centre boundary40</i></p> <p><i>b) mixed-use redevelopment of car parks and low-density retail parks and supermarkets</i></p> <p><i>c) housing intensification on other appropriate low-density sites in commercial, leisure and infrastructure uses</i></p> <p><i>d) the redevelopment of surplus utilities and public sector owned sites</i></p> <p><i>e) small sites (see Policy H2 Small sites)</i></p> <p><i>f) industrial sites that have been identified through the processes set out in Policy E4 Land for industry, logistics and services to support London’s economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Industrial intensification, co-location and substitution.</i></p> <p>Paragraph 4.2.4 of the London Plan, in support of London Plan Policy H2: Small Sites refers to the role of incremental intensification of existing residential areas within PTALs 3-6 or within 800m distance of a station or town centre boundary. The Council’s policy, as worded, would militate against the supply of small residential developments.</p>	<p>The proposed policy is unsound. It will restrict opportunities for residential development in the borough, especially the potential for small sites. Given the serious shortfall in housing supply across London as a whole, removing this restriction is necessary. The policy should be reworded to reflect the aims of 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 clear that it applies to proposals for main town centre uses, providing the basis for protecting and promoting the vitality and viability of Newham's network of town and local centres, neighbourhood parades, and new small scale frontages. The Plan is applied in the round, and there are many policies that support residential development, including policy HS2.5 that supports the co-location of residential as part of high streets development. The Council is satisfied that the plan is sound without the proposed changes.</p>

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Reg19 -E-095	Get Living Plc	Quod	Reg19-E-095/006	High Street	HS1 Town Centre Network						Blank	No						Blank	<p>Town Centres – planning policy should be accurate with regards to town centre boundaries and flexible to support the wide range of uses that has helped make East Village a successful and attractive place to live.</p> <p>[Appendix 2 - Representations Part 1] GL support the principles under Policy HS1 and agree with the key functions of East Village Local Centre to meet local catchment needs for retail, leisure, services and community uses. GL welcome the East Village Local Centre boundary which reflects the focus of retail activity with the exception of Plot N16 which is partially located in the Metropolitan Centre in the LLDC Local Plan.</p>	GL recommend the town centre boundaries reflect those adopted under the LLDC Policies Map but recommend the entire plot is located within the Metropolitan Centre as opposed to part of it.	A change to this designation has not been made. We did not consider this change to be necessary as the issue of the boundary changes between Stratford Town Centre and East Village local centre has been subject to further discussion with the LLDC before their transition of planning powers back to the borough and a satisfactory resolution has been found. This is set out in more detail in a Statement of Common Ground, and referred to in the Duty to Cooperate Addendum (2025). The Council and the LLDC are satisfied that the plan remains sound without these changes.
Reg19 -E-169	Silvertown Homes Ltd	DP9	Reg19-E-169/007	High Street	HS1 Town Centre Network						Blank	No						Blank	<p>[Policy J1 ‘Employment and Growth’ 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. 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. 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>	[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 change to this designation has not been made. We did not consider this change to be necessary as the boundary had been reached with due regard to the approved masterplan for the site, as set out in the Town Centre Network Review Methodology Paper 2022. The site is expected to deliver a new local centre, a requirement that is part of the existing Local Plan (2018) under which permission for the site was granted. The designation provides further certainty for the delivery of the new local centre. The Council is satisfied that the plan is sound without the proposed changes.
Reg19 -E-181	LAMIT c/ CCLA Investment Management Ltd	Rolfe Judd Planning	Reg19-E-181/010	High Street	HS1 Town Centre Network						Blank	Blank						Blank	<p>[Key Emerging Policies</p> <p>The following draft policies are relevant to the Alpine Way site:]</p> <p>HS1 (Newham’s Town Centres Network) outlines the strategy for its Town Centres Network, focusing on accessibility and service provision. East Beckton Town Centre is classified as a District Centre, serving local needs for retail, leisure, services, and community activities. It is one of Newham’s six largest town centres. The plan emphasizes improving the leisure offerings in East Beckton to complement its current retail focus and meet the growing demand for community services.</p>		Comment noted.

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Reg19 -E-184	Primark Stores Ltd	CBRE	Reg19-E-184/006	High Street	HS1 Town Centre Network						Yes	Yes						Yes	Draft Policy HS1: Newham’s Town Centres and Draft Policy HS2: Managing new and existing town and local centres Primark support the key functions of East Ham Town Centre, which is a Major Town Centre in scale. This includes meeting the retail, leisure, civic and services needs of all Newham residents, meeting local community use and post-16 education hub needs. Primark also supports LBN’s implementation strategy, which seeks to ensure that main town centre uses at or above 2,500 sqm within Stratford Town Centre do not detrimentally impact the viability and vitality of East Ham Town Centre. Primark agree with LBN’s support for redevelopment and refurbishment of sites within town centres, and the objective of residential use as part of mixed-use redevelopments, which is strongly supported by LBN.		Support noted.
Reg19 -E-186	Muse	Longboard Consulting	Reg19-E-186/007	High Street	HS1 Town Centre Network							No		No					Newham’s Draft Submission Local Plan (Regulation 19) June 2024 Policy HS1 identifies part of the Land Comprising Former HSS Site and 300 Manor Road (18/03506/OUT) as being included within ‘Potential Town Centre Boundary Extension’.The Justification is based on the Class E floorspace granted planning permission for the Land Comprising Former HSS Site and 300 Manor Road site (and the potential for a leisure centre/swimming pool on Malmesbury Road Park open space which forms part of the former Strategic Site 13) – see Proposed Amendments and New Designations to Newham’s Town Centres Network in the Draft Local Plan Regulation 18 Version (December 2022).Given the planning permission and location of the site the town centre boundary should be formally extended (rather than potential extension) and to the whole of the former Strategic 13, rather than part of the site.	Extract from Submission Draft Local Plan Policies Map (on-line version) All Map Layers switched off other than: Town Centres Potential Town Centre Boundary Extension [Image] Extract from Newham Local Plan 2018 Policies Map Strategic Site 13 [Image] 1. Amend Policies Map to include all of former Strategic Site 13 as being within the town centre boundary.2. Amend Map of Town Centre Networks (p.112) to include all of former Strategic Site 13 within the town centre boundary.3. Remove reference to ‘potential extension’.	A change to this designation has not been made. We did not consider this change to be necessary as the boundary had been reached with due regard to the approved masterplan for the site, as set out in the Town Centre Network Review Methodology Paper 2022. Other sections of the masterplan, while approved to deliver a wider spread of main town centre uses, did not meet the methodology required to allow for future designation. The Council will assess the performance of the newly delivered floorspace as part of a future Local Plan review to identify whether this section of new main town centre uses should be included into the boundary of the town centre, as there is not sufficient evidence to support this at this time. The Council is satisfied that the plan is sound without the proposed changes.
Reg19 -E-194	London Borough of Tower Hamlets		Reg19-E-194/005	High Street	HS1 Town Centre Network														2. Support for policies and site allocations LB Tower Hamlets wishes to express support for several policies and site allocations. Policies • HS1 – We support the redevelopment of Gallions Reach Retail Park as this has been identified in the Tower Hamlets Retail and Town Centre Study as a major leakage of spending out of the borough to out of town retail centres.		Support noted.

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Reg19 -E-195	St William Homes LLP	Quod	Reg19-E-195/035	High Street	HS1 Town Centre Network			HS1. 3b											Policy HS1: Newham’s Town Centres Network 5.2 Part 3 (b) requires a minimum of 20 non-residential units within local centres (with the majority of units between 80 sqm and 150 sqm GIA each). As stated previously, it is considered that flexibility is needed, particularly in the current retail market, to avoid risk of commercial units sitting vacant long-term. The appropriate scale for new local centres should be informed by floorspace need and commercial demand, including existing and proposed housing within its catchment. We have suggested amendments to the wording of this policy in Appendix 12.	[Appendix 12: General Policies – Suggested amendments] 3. Development within the areas identified to deliver new and extended local centres, within the boundaries mapped on the Policies Map, should contribute to the masterplanned delivery of the centres by applying all of the following principles: b. The overall scale of main town centre uses or social infrastructure uses of the local centre will be informed by floorspace need and commercial demand primarily result in at least 20 non residential units. The majority of units will be between 80 sqm and 150 sqm GIA each. A small to medium sized food store may be appropriate to meet local need, subject to passing a retail Impact Assessment.	A change to this policy approach has not been made. We did not consider a change to be necessary as the impact assessment requirement of HS1.3a already secures the objective outlined in your proposed modification, that the overall floorspace should respond to local need. Part 3b provides further guidance about what the overall main town centre use floorspace should be designed as, and the policy has already been amended from Reg 18 to Reg 19 to provide flexibility in unit sizes, to be primarily of the small size recommended by the Retail and Leisure Study (2022) while also allowing for other uses, for example community uses (defined through policy CF1) to be set up in units larger than 150sqm GIA in Local Centres, if justified by local need. The policy approach relating to the size of food stores also allows for more flexibility in the type of provision which can be located in Local Centres, recognising the variety of business models for small and medium convenience store operators. The Council is satisfied that the plan is sound without the proposed changes.

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Reg19 -E-195	St William Homes LLP	Quod	Reg19-E-195/036	High Street	HS1 Town Centre Network			HS1.4											5.3 Part 4 of draft Policy HS1 discusses the requirements for development within neighbourhood parades and part c) outlines a requirement for the provision of a small food store (of more than 300 sqm GIA) to be subject to passing a retail impact assessment. Part d) goes on to require a retail impact assessment for any proposal resulting in 1,000 sqm GIA or more cumulative floorspace in main town centre uses. The policy as currently drafted therefore sets out two different retail impact assessment thresholds which is confusing and unclear.	[Appendix 12: General Policies – Suggested amendments] 4. Development within neighbourhood parades or proposed new non-designated small scale shopfront unit groupings should ensure that: c. small food store of more than 300 sqm GIA may be appropriate, subject to passing a retail Impact Assessment, and the use is limited through condition. d. Any proposal resulting in 1000sqm GIA or more cumulative floorspace in main town centre uses, including creation of new neighbourhood parades, is supported by an Impact Assessment and a well-resourced Vacancy Prevention Strategy.	The Council’s objective for this policy approach is to ensure that the vibrancy of Newham’s neighbourhood parades is balanced against the need to protect the vitality and viability of the network of town and local centres. However, the Council recognises the importance of ensuring the Plan is clear and consistent, noting that the Retail and Leisure Study recommended the single threshold of 300sqm GIA for impact testing, and has therefore drafted the following modification, which will be presented to the Inspector for their consideration, to policy HS1.4: [HS1.4] Development within neighbourhood parades or proposed new non-designated small scale shopfront unit groupings should ensure that: a. The overall parade remains of a neighbourhood scale, of between five and ten non-residential units, and primarily small units (80 to 150 sqm GIA) in use class E (Commercial, Business and Service) or social infrastructure of a scale justified by local need. Where development includes 300sqm GIA or more of cumulative new floorspace in retail (Class E(a)) or in main town centre leisure uses (Class E(b) or Sui Generis), a retail and/or leisure Impact Assessment will need to be passed. [...] d. Any proposal resulting in 1000 sqm GIA or more cumulative floorspace in main town centre uses, including creation of new neighbourhood parades, is supported by a an Impact Assessment and a well-resourced Vacancy Prevention Strategy.

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Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/035a	High Street	HS1 Town Centre Network			HS1.1											<p>Part 1: TSP support the principle of a 15-minute neighbourhood, which is particularly applicable to Silvertown and the Royal Docks Opportunity Area. To achieve this vision and create communities based on 15-minute neighbourhood principles, a dynamic and flexible policy approach should be adopted, to reshape the traditional high street hierarchy. With regards to Part 1 (e), as set out above, TSP consider a Local Centre at Silvertown should be considered as a standalone Local Centre with its own population and key functions, rather than an “extension” of Royal Wharf Local Centre. Notwithstanding the above, the Site should be complementary to the offer at Royal Wharf. [...]</p> <p>(...)Table 3 sets out Newham’s Town Centres Network which establishes a locations scale, potential scale and a location’s key functions. Silvertown has been noted as a local centre which meets the local catchment need for retail, leisure services and community uses and as a location which supports an incidental visitor economy. TSP supports the wording set out within this part of the policy and the role that Silvertown has been noted to play as a local centre.</p>		<p>A change to this policy approach has not been made. We consider this change would undermine delivery of the council's objective to deliver a network of well-connected, integrated neighbourhoods. This is because your proposal is for the Silvertown Quays site to be considered in isolation from its immediate context, which goes against national, regional and local guidance on good placemaking. Creating two centres would also not be consistent with the methodology set out in the Town Centre Network Review Methodology Paper 2022. A single integrated Local Centre optimises opportunities within the wider location. It is logical in terms of how it relates to travel patterns and the proximity of main town centre uses creating a single cluster.</p> <p>The Council considers that the proposed scale and location of the boundary represents a proportionate distribution of the retail floorspace need in the Royal Docks area as set out in the Retail and Leisure Study (2022). The policy allows for the boundary of the Local Centre extension to be flexibly adjusted through masterplanning processes, and does not impede a difference in the character of the offer on either side of the North Woolwich Road. The Council is satisfied that the plan is sound without the proposed changes.</p>

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Reg19 -E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/035b	High Street	HS1 Town Centre Network			HS1.3								No			<p>Part 3: The requirements for Impact Assessments (under Part 3) for a Town/Local Centre is at odds with the national Town Centre first approach and would deter a full range of businesses coming forward, particularly small businesses. Town Centre uses should remain flexible in accordance with the Use Class Order amendments made in 2020.</p> <p>Similarly, the list of criteria under part 3, particularly those which set specific unit numbers and floorspace requirements, further restricts the design-led approach. This approach is overly prescriptive and does not enable flexibility, or for units to be led by design or market need. The quantum, size and location of Local Centre units should be assessed on a case-by-case basis through the submission of planning applications.</p>	<p>The rationale behind the requirements for an evidenced Marketing Strategy and Meanwhile Use Strategy (Part 3(c)) within the new centres is unclear and TSP are concerned that this could place unnecessary burdens on certain non-residential development coming forwards in these centres and thus restrict the types of development that might be located on-site. These requirements should be removed from the emerging policy.</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 a retail/leisure impact test as part of the creation of new local centres is necessary in order to ensure that the overall network remains balanced and that the new centre is of a scale that responds to evidenced local needs rather than creating a new destination, as required by the Retail and Leisure Study (2022). This is also the current approach under the existing Local Plan.</p> <p>Policy HS1.3 provides further guidance about what the overall main town centre use floorspace of a new local centre should be designed as, and the policy has already been amended from Reg 18 to Reg 19 to provide flexibility in unit sizes, to be primarily of the small size recommended by the Retail and Leisure Study (2022) while also allowing for other uses, for example community uses (defined through policy CF1) to be set up in units larger than 150sqm GIA in Local Centres, if justified by local need. The policy approach relating to the size of food stores also allows for more flexibility in the type of provision which can be located in local centres, recognising the variety of business models for small and medium convenience store operators. Further, many of the policies set out under HS1 and HS2, including through the criteria of HS1.3, are in support of small businesses, by facilitating the creation of smaller units and in certain circumstances affordable rent units that can support such businesses accessing floorspace. The Council is satisfied that the plan is sound without the proposed changes.</p>

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Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/035c	High Street	HS1 Town Centre Network														The proposals for Silvertown have been developed through a design-led approach and the focus of the centre recognises the importance of the proposed Silvertown Avenue as a key connector to Custom House and the placemaking importance of Millennium Mills. The current boundary does not reflect this opportunity. It would be an unsuccessful placemaking and 15-minute outcome for the centre to be located only at the North Woolwich Road frontage of the Site.		<p>A change to this policy approach has not been made.</p> <p>We consider this change would undermine delivery of the council's objective to deliver a network of well-connected, integrated neighbourhoods. In the context of limited retail growth need as set out in the Retail and Leisure Study (2022) the proposal to increase the boundary of the 'Potential Local Centre Boundary Extension' to Silvertown Local Centre up to the Millenium Mills would undermine the ability of the Local Plan to provide for improved retail access across the Royal Docks area.</p> <p>The Council considers that we have adopted an appropriate balance between the and scale of main town centre uses on this site and the overall vision for active frontages on the site. The scale of the designation is based on the assessment in the Town Centre Network Review Methodology Paper Update 2024, which is based on an undertanding of local context, including existing frontages of the Silvertown local centre south of North Woolwich Road. Further, the designation represents a proportionate distribution of the retail grown need in the Royal Docks area as set out by the Retail and Leisure Study (2022). The policy allows for the boundary of the Local Centre extension to be flexibly adjusted through masterplanning processes, and does not impede a difference in the character of the offer on either side of the North Woolwich Road.</p> <p>Further, the overall vision for the site can be achieved through other forms of activation than simply the use of main town centre uses, and which is set out and supported in the site allocation principles.</p>
Reg19-E-207	Unibail-Rodamco-Westfield	DP9	Reg19-E-207/003	High Street	HS1 Town Centre Network						No	No							We support the aspiration in draft Policy HS1 (Newham’s Town Centres Network) for Stratford Metropolitan Centre to become an International Town Centre and URW’s wider Estate has a significant role to play in meeting this objective.		Support noted.

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Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/12	High Street	HS1 Town Centre Network														High Streets Policy HS1: Newham’s Town Centres Network As set out above, Ballymore supports the designation of N3.SA3 Connaught Riverside as a new local centre as well as a new Neighbourhood Parade at N3.SA2 Lyle Park West. It was previously noted for the Regulation 18 version that Part 3 of the policy was too prescriptive, particularly part (a) which required that the scale of the Local Centre will be of at least 20 non-residential units with units between 80sqm and 150sqm GIA each. As noted in the Council’s response, a wording change has been made to note that the ‘majority’ of units will be 80sqm and 150sqm GIA each, providing flexibility in unit sized to be ‘primarily of the small size recommended by the Retail and Leisure Study (2022) while also allowing for other uses, for example community uses (defined through policy SI1) to be set up in units larger than 150sqm GIA in Local Centres, if justified by local need’.		Support noted.
Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/13	High Street	HS1 Town Centre Network														The policy approach relating to the size of food stores has also changed to allow for more flexibility in the type of provision which can be located in Local Centres, recognising the variety of business models for small and medium convenience store operators. Ballymore would still suggest the requirement for ‘a variety of small to medium unit sizes’, rather than setting out specific floor areas within the policy, however we support the greater flexibility noted.		Support noted.

Reg19 -E-233	RAD CHP Ltd	CBRE	Reg19-E- 233/005	High Street	HS1 Town Centre Network												Blank	No		No								Blank	<p>Draft Policy [BFN1: Spatial Strategy and] HS1: Newham’s Town Centres</p> <p>The Spatial Strategy (part 4) states that: “Development will meet the retail and leisure needs of residents, workers and visitors by a. Directing main town centre uses to the borough’s network of Metropolitan, Major, District and Local Centres and supporting their diversification and in some cases expansion; and b. creating a new District Centre on N17.SA1 Beckton Riverside site allocation; and c. creating new Local Centres on N2.SA3 Connaught Riverside, N2.SA4 Thameside West, N7.SA2 Twelvetrees Park and Former Bromley By Bow Gasworks, N7.SA3 Sugar House Island and N8.SA9 Pudding Mill; and d. creating expanded Local Centres on N1.SA2 Rymill Street, N2.SA1 Silvertown Quays and N9.SA1 Plaistow North; and e. protecting and expanding the borough’s network of Neighbourhood Parades to ensure the delivery of a network of well-connected neighbourhoods”.</p> <p>During discussions with LB Newham Planning and Policy Officers, RAD CHP Ltd. has been met with significant resistance to the proposed provision of active, ground floor, public-facing Class E units within the Phase 1 buildings at RAD, despite the already consented provision as a result of the historic ABP planning hybrid permission, which permitted circa. 5,000 sq.m GEA of retail and leisure space in detail, and 10,000 sq.m GEA in outline. There are currently very limited convenience facilities in the site vicinity, for example chemists, food/convenience stores. All exceed 15 minutes-walk from the site (and 400m catchment). Those to the south are across the marina so not accessible. [Figure 1] below shows the existing facilities available. The RAD site is not within the catchment for any designated existing District, Local or Town centre. The nearest existing designated centres to the site are East Beckton District Centre (which has an Asda, a Lidl and small comparison retail) and East Ham Manor Way Local Shopping Parade (LSP10) to the east of the Site (which contains a Fish Bar, Off Licence and Pharmacy). The site is outside of the catchment (400m) of these centres and the Shopping Parade is very limited in its offering. The Regulation 19 Local Plan Policies Map includes a new ‘Neighbourhood Parade’, at the eastern edge of the RAD Phase 1 site. [Figure 2] below shows the draft Policies Map extract for the site vicinity and [Figure 3] shows the site allocation outlined in red specifically, and its proposed ‘Neighbourhood Parade’. Whilst RAD CHP Ltd. support the modest new ‘Neighbourhood Parade’ that is proposed, this alone will not meet the need of the future population intended to occupy this strategic, opportunity area site. It is not proportionate to the quantum of residential and commercial development intended to come forward on the RAD site and wider allocation, which is linear and extends a significant way westwards (beyond 400m). There is potential for almost 2,000 workers under office employment densities for the existing eastern linear blocks within Phase 1 alone (alongside the 628 student rooms with Resolution to Grant). If the Neighbourhood Parade is the only portion of the strategic site specifically designated for town centre uses, it needs to be recognised and clearly expressed within the emerging Site</p>		<p>The objective of the Royal Albert Quay Neighbourhood Parade designation is to address to a known gap in the network. The location and scale of this designation is supported by the methodology and assessment undertaken in the Town Centre Network Review Methodology Paper Update 2024.</p> <p>The parade was delivered as part of the first phase of development on the Royal Albert North site allocation, and remains significantly vacant. Therefore, the Council does not consider there is evidence to support delivery of a larger scale designation at this location.</p> <p>However, policy HS1 intends to provide further flexibility in meeting needs in areas not within 400m radius of an existing or planned town or local centre or neighbourhood parade, by allowing for the masterplanned delivery of small scale frontages serving localised need. The Council recognises the importance of ensuring the Plan is clear in its intended application, and has therefore made the following wording change to policy HS1.1 and its respective implementation text, which are included in the modifications table.</p> <p>HS1.1. [...]The network will be managed and supported to service the needs of residents, workers and visitors, and includes: [...] f. The creation of new small scale frontages serving localised need including new Neighbourhood Parades at N17.SA1 Beckton Riverside, N2.SA2 Lyle Park West and N8.SA3 Greater Carpenters District; and g. The creation of new small scale frontages serving localised need in areas not within 400m radius of an existing or planned town or local centre or neighbourhood parade.</p> <p>[HS1.1 Implementation] New Small scale shopping frontages It is not possible to fully address all 400m catchment gaps in the network at this time due to lack of available, suitable and deliverable sites. To provide additional flexibility to address this through windfall sites, the policy allows for small scale shopping frontages to be delivered, of a similar function to the designated neighbourhood parades, and which will be considered towards designation as a neighbourhood parade as part of future reviews of the Local Plan.</p> <p>In determining if a proposed new un-designated shopping small scale frontage is appropriate, the applicant should submit a gap analysis to demonstrate:</p> <ul style="list-style-type: none">• Proximity criteria: A 400 metre radius around the proposed shopping small scale frontage overlaps by less than 50 per cent with any other 400 metre radius of a designated area in the network (existing and future). The radius is measured from the perimeter of the proposed shopping small scale frontage and the boundary of relevant designated parts of Newham’s High Streets network. And• Network density criteria: The proposed
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																			Allocation that whilst this parade is a focus, town centre uses will not be precluded across the wider allocation and a masterplan-led approach will be taken to the mix of land uses. Draft Policy HS1 states that “all homes” in Newham should be within a maximum 400m radius of at least one designated centre or parade, or be within a 15 minute walking distance of at least two designated centres or parades. This statement substantiates the need for a masterplan-led approach to provision of retail, services and community uses at RAD, beyond the proposed designated Neighbourhood Parade, provided they are demonstrated to not result in significant impact on existing trade draw patterns. The completed RAD Phase 1 development and the wider future masterplan requires an element of retail, restaurants and other such uses to create a successful place with facilities that can serve the future residents, students and workers on the site as well as the wider surrounding area where there is a gap in provision. There will be opportunities for such facilities to open out into the public realm and along the waterside and this should be utilized and encouraged within the completed development and the future masterplan. Limiting the ground floor active uses to the envisaged Neighbourhood Parade would be detrimental to achieving the masterplan objectives and creating a sense of place across the wider site. We therefore consider that as drafted, this element of the emerging Local Plan is unsound, and unjustified. We cannot see a sufficient evidence base to justify the scale of the Neighbourhood Parade or its location in the strategic site. If policy officers continue to resist any active ground floor uses outside of the Neighbourhood Parade, the convenience needs of the incoming population will be unmet.		<p>shopping small scale frontage location helps achieve the aspiration for at least two high street destinations within a 15 minute walking area. This should reflect a detailed understanding of the actual walking conditions for a range of different users) of the site (e.g. accessibility conditions for people with movement impairments, women-friendly routes). The most accessible area should be chosen, accounting for any proposed enhancements as part of the development or known programmed Highways works.</p> <p>In limited circumstances where site allocations are expected to deliver new centres/parades, the above criteria may be used to justify the split of the provision of retail and leisure uses across parts of the site, thereby generating one or more new shopping small scale frontages alongside the necessary centre/parade. A clear justification will be required for the benefits of this approach compared to clustering of uses in the centre designation only, and should not result in additional retail or leisure floorspace being provided on site (i.e. the cumulative site-wide quantity is justified by local catchment need, through the Impact Assessment). Further expansion of main town centre use floorspace for ground floor frontage activation will normally not be supported.</p> <p>Where acceptable in principle, new small scale frontages should also meet the criteria set out in part 4 of this Policy. The Newham Characterisation Study (2024) Borough-wide Design Principles chapter includes further design recommendations (primarily under section 9.2.1 ‘Provide Local Uses That Support 15 Minute Neighbourhoods’) that should be imbedded in the design brief when new shopping small scale frontages are proposed.</p>

Reg-19-D-EH-001	Sharon Fell		Reg-19-D-EH-001/001	High Street	HS2 Managing New and Existing Town and Local Centres							Blank	No					Blank	<div>1. Many issues need to be addressed and rectified in the High St itself before further building of homes can be considered. This should have been done before the recent new builds were undertaken. Eg<ul style="list-style-type: none">• The High St is unattractive and rundown and needs to be improved and standards raised.• Crime levels are high and create a hostile environment.• New shopping mall practically empty, empty shops. Need to make shopping area more vibrant.</div>		<div>A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan set out a vision for each town centre as part of the Neighbourhood policies, where there is the specific evidence to do so. These locally specific policies work together with the broader High Streets chapter policies to address development in a way that is respectful of, and aspirational for, the local area while also meeting national requirements and responding to broad trends affecting all high streets. As recommended by the Retail and Leisure Study (2022), Policy HS2 seeks to accommodate an increasing range of uses within the network of town centres, including housing, to help improve the sustainability of town centres in the long term. The study also recommended that the Council should support the delivery of redeveloped or refurbished sub-standard or low density space to deliver the diversification of town centre uses, alongside support for the retention of ground floor shop frontages. The Plan, in the round, supports the delivery of improvements to the vitality and viability of town centres, including East Ham, while also enabling residential development to come forward alongside,helping to meet a range of local objectives.</div> <div>Our monitoring also indicates that a number of recent large scale mixed use developments, including main town centre uses, have remained vacant for extended periods of times, sometimes years following completion - for example, Rathbone Market in Canning Town, and Silvertown/Royal Wharf. Therefore, policy HS2.6 enables proactive management of this issue for future developments by requiring that major non-residential development of main town centre uses is supported by adequately resourced Vacancy Prevention Strategy and Marketing Strategy.</div> <div>The Local Plan addresses the topic of safety and security through a range of policies, such as requiring developments to have proactively design in safety and security measures (see Policies D1, D2, D5, GWS1), and have Secure by Design accreditation (Policy D1). Funding from development may also be sought to address specific crime and safety impacts from a development (Policy D2) and to build capacity in local partnerships addressing high streets safety coordination (Policy HS5). The Metropolitan Police Service (run by the GLA), is also a consultee for the Local Plan and as part of decisions on major planning applications, and have dedicated designing-out-crime officers who are trained to conduct environmental visual audits to identify methods of making a place less attractive for criminal behaviour. This is a proportionate approach to the role that the planning system can play in promoting safety.</div> <div>The Council is satisfied that the plan is sound without the proposed changes.</div>
Reg19-E-006	Maria Marino		Reg19-E-006/008	Building a Fairer Newham	HS2 Managing New and Existing Town and Local Centres							Blank	Blank					Blank	<div>In the area im I don't find any supermarkets (english kind like Tesco's , Coop et I have to travel to buy food either Wanstead , Ilfort Stratford or even churches including catholics ones . I live in an only Asian supermarkets and restaurants ,(that I love as I'm veg) but shops and services only for men : barberies , car sales , tyres , betting shops , fast food , mosques and temples not</div>		<div>These comments do not relate to the tests of soundness and it is considered that this policy approach is sound. The Plan addresses the issue you have raised through policy HS2, which promotes diversification of uses in town and local centres, and policy HS6 which seeks to control the cumulative impacts of hot food takeaways and gambling premises. However, the planning system works on the basis of use classes and cannot dictate who the occupiers</div>

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																			cafes or option for women and girls .		of units should be, and the policies of the Plan cannot be applied retrospectively to established development. As and when proposals come forward, a number of policies in the plan also provide guidance on how the needs of women and girls should be considered through the design and process of the development, for example BFN2 related to masterplanning and engagement, BFN3 in relation to social value and health impacts of development, SI2 related to new and re-provided community facilities and health facilities, and policy GWS1 related to playspace.
Reg19-E-065	Stratford Original BID		Reg19-E-065/001	High Street	HS2 Managing New and Existing Town and Local Centres						Blank	Blank						Blank	[Following our participation to two consultation events where we shared our feedback, I further submit a summary of points we discussed around the Local Plan. Most of the points do endorse Newham Local Plan Neighbourhoods/Inclusive Economy. There are some additional recommendations as expansion to existing points (i.e. Inclusive economy, J1 and active frontages). None of the following points challenge or question the soundness and legal ground of local plan review. These are as follows:] - Protecting active frontages to high streets and traditional town centres. What we have seen over the years in Stratford town centre is the delivery of ground floor units in big developments without any commitment of securing occupancy leading to empty and inactive space.		Comment noted. The Plan addresses the issue you have raised through the requirement to submit a Vacancy Prevention Strategy as part of new major non-residential development at or over 1000sqm.
Reg19-E-065	Stratford Original BID		Reg19-E-065/006	High Street	HS2 Managing New and Existing Town and Local Centres						Blank	Blank						Blank	[Following our participation to two consultation events where we shared our feedback, I further submit a summary of points we discussed around the Local Plan. Most of the points do endorse Newham Local Plan Neighbourhoods/Inclusive Economy. There are some additional recommendations as expansion to existing points (i.e. Inclusive economy, J1 and active frontages). None of the following points challenge or question the soundness and legal ground of local plan review. These are as follows:] - Any future development put forward in the Stratford town centre should be protective of its traditional shopping centre and businesses. The local town centre has been long serving the community of Newham. It has been in the heart of its community life with a wealth of services.		Comment noted. The Plan addresses the issue you have raised through the requirement of policies HS1, HS2 and HS4.

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Reg19-E-065	Stratford Original BID		Reg19-E-065/007	High Street	HS2 Managing New and Existing Town and Local Centres						Blank	Blank						Blank	[Following our participation to two consultation events where we shared our feedback, I further submit a summary of points we discussed around the Local Plan. Most of the points do endorse Newham Local Plan Neighbourhoods/Inclusive Economy. There are some additional recommendations as expansion to existing points (i.e. Inclusive economy, J1 and active frontages). None of the following points challenge or question the soundness and legal ground of local plan review. These are as follows:] - Improved public realm and spaces to dwell, including increasing green infrastructure is crucial for a healthy town centre.		Comment noted. The Plan addresses the issue you have raised through the requirement of policies HS2.9 and D2.
Reg19-E-081	Metropolitan Police Service - Designing Out Crime		Reg19-E-081/005	High Street	HS2 Managing New and Existing Town and Local Centres						Blank	Blank						Blank	4) We would recommend any Policies that propose changes/improvements to the below areas also reference early engagement with the CTSA's: - Crowded Places [- Transport Infrastructure - Class A Licenses Premises - Utilities - Storage of Hazardous Materials - Iconic Buildings and; - Tall Buildings]	An example would be Policy HS2: Managing new and existing town and local centres (pages 124-125) where this could be referenced in the Policy itself Section 9 (page 125) or within the Implementation Section HS2.9 (page 134).	A change to this policy approach has not been made. We did not consider this change to be necessary as the proposed modification to implementation section for policy D1.3 sets out the need to engage with the Counter Terrorism Security Advisors where this has been identified as relevant. This is the most appropriate way to address these matters in all circumstances that involve operational development. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-081	Metropolitan Police Service - Designing Out Crime		Reg19-E-081/031	High Street	HS2 Managing New and Existing Town and Local Centres						Blank	Blank						Blank	[Appendix 1: Supporting Policies Specifically Relating to Crime Prevention Draft Submission Local Plan (Regulation 19 June 2024)] Policy HS2: Managing new and existing town and local centres pages 124-125 1. All development within the borough's town and local centres should meet all the below criteria as proportionate to the type and scale of development proposed: d. Provide attractive, active frontages, and accessible and safe access. f. Be well managed and maintained. 3. Within town and local centres, development proposing the shared use of a space or a building by multiple uses/businesses engaged in main town centre uses is encouraged, including on upper floors, subject to all the following: b. Active frontages, and particularly shopfronts, are retained. 9. In line with public realm net gain principles of Local Plan Policy D2, developments in town and local centres should demonstrate how their proposals help achieve all of the below, as relevant to the scale and context of the development: a. An accessible, comfortable, greener, safe and well maintained public realm at all times of the day and night. b. Improved connectivity with and accessibility from neighbourhoods within the centre's catchment;		Support noted.

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Reg19-E-081	Metropolitan Police Service - Designing Out Crime		Reg19-E-081/032	High Street	HS2 Managing New and Existing Town and Local Centres					HS2.9	Blank	Blank						Blank	<p>[Appendix 1: Supporting Policies Specifically Relating to Crime Prevention Draft Submission Local Plan (Regulation 19 June 2024)]</p> <p>Implementation Policies page 134</p> <p>HS2.9 The principles and objectives of public realm net gain are set out in Local Plan Policy D2. Pavements should be generous and designed to comfortably and safely manage high footfall levels, and include enlarged pavement for ‘spill-out’ space in front of clusters of food and drink leisure or cultural uses or community facilities such as libraries. Providing at least one small local square is encouraged along pedestrian-busy major roads, and could include meeting/gathering points, areas of respite or play, and potential for outdoor meanwhile uses such as markets or local cultural events. The Newham Characterisation Study (2024) Chapter 9 Borough-wide Design Principles includes further design recommendations (primarily under section 9.2.1 Provide local uses that support 15minute neighbourhoods). Wayfinding and digital infrastructure (such as USB charging points and Wifi hotspots) incorporated into the public realm of centres is encouraged, and should ensure these are located and designed for safe access during the day and at night, with particular attention to designing for comfortable use by women and girls. Early engagement should take place with the Council’s Highways, Public Realm Management, and Regeneration teams to help identify opportunities where correlating designs or pooling resources would add value to planned public sector investment in the public realm of the respective centre.</p>		Support noted.
Reg19-E-095	Get Living Plc	Quod	Reg19-E-095/014	High Street	HS2 Managing New and Existing Town and Local Centres						Blank	No						Blank	<p>[Town Centres – planning policy should be accurate with regards to town centre boundaries and flexible to support the wide range of uses that has helped make East Village a successful and attractive place to live.]</p> <p>[Appendix 2 - Representations Part 1]</p> <p>GL support the principles to protect existing town centres but note that some parts of this policy could be relaxed, specifically Part 4. Planning policy must be flexible to allow centres such as East Village to adapt to its resident needs and provide a range of non-residential uses that contribute to the sense of place. Restricting the subdivision of existing Class E units under Part 4 could for example restrict opportunities to attract additional or other town centre uses. The success of the non-residential units at East Village is based on a wide range of uses, which in turn supports one of the five key principles to create a 15-minute neighbourhood.</p>		A change to this policy approach has not been made. We did not consider this change to be necessary as the policy is justified by the recommendations of the Retail and Leisure Study, and implementation text provides clear criteria for when subdivision would be deemed to result in poor quality units that would not be supported. In the case of East Village, the units have been recently delivered and tend to be larger than traditional high street frontages. As such, there is likely scope for subdivision resulting in units that are of suitable quality, and this will be assessed at planning application stage. The Council is satisfied that the plan is sound without the proposed changes.

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Reg19-E-096	Redefine Hotels Portfolio IV Ltd	Savills	Reg19-E-096/034	High Street	HS2 Managing New and Existing Town and Local Centres														It is also noted that draft policy HS2 (Managing new and existing town and local centres) sets out that “within town and local centres, redevelopment or refurbishment of sites will be supported where it contributes to the vitality and viability of the centre and optimises the use of the site”. This aspiration is supported and our proposals accord with this.		Support noted.
Reg19-E-100	Simpson and Goldstein	Lichfields	Reg19-E-100/023	High Street	HS2 Managing New and Existing Town and Local Centres	N9.S A1 Plaistow North					Yes	No						Yes	Town Centre Section HS of the plan relates to high streets. S&G continue to support Plaistow North remaining as a Local Centre in the retail hierarchy (i.e. ‘meeting local catchment needs for retail, leisure, services and community uses’). Draft Policy HS2 has been updated and now states that ‘residential uses as part of the mixed-use development is strongly supported’, removing the need for these to be located at upper floors. This is welcomed by S&G.	However, we would suggest that the makes specific reference to coliving, to align with the objectives of Policy H9, which specifies that town centres are appropriate locations for co-living developments. S&G seek flexibility in the wording of Policy H2 in relation to building heights within town and local centres.	Support noted.
Reg19-E-156	John Saunders		Reg19-E-156/005	High Street	HS2 Managing New and Existing Town and Local Centres						Blank	Blank						Blank	<u>High Street and Shopping Centre empty buildings</u> [such as Stratford Wilco and Stratford Picture House] To support future use, monitor and act on deterioration due to neglect and illegal use.		These comments do not relate to the tests of soundness and it is considered that this policy approach is sound. The Plan addresses the issue you have raised through the requirement to submit a Vacancy Prevention Strategy as part of new major non-residential development at or over 1000sqm. However, it cannot deliver the change you are seeking as the policy cannot be applied to existing development, only to future planning applications.
Reg19-E-185	Hadley Property Group	Deloitte	Reg19-E-185/012	High Street	HS2 Managing New and Existing Town and Local Centres														High Streets HS2: Managing new and existing Town and Local Centres Hadley agrees with the changes made following previous comments to reduce the amount of affordable Class E floorspace in town centres providing more than 1,000sqm GIA Class E floorspace from 20% to 10% as this in line with common practice and would not be a barrier to development. Hadley is supportive of policy that encourages meanwhile uses on vacant sites and agrees with changes made following earlier comments on the requirements for a Vacancy Prevention Strategy for Use Class E floorspace over 1,000sqm in town centres. The supporting text setting out the requirements for this document enable more flexibility to the process of marketing vacant units for temporary units and enable the strategy to reflect the uncertainties that could cause vacant units due to changes in market demand and the current economic climate.		Support noted.

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Reg19-E-190	Manor Park Business Association		Reg19-E-190/005	High Street	HS2 Managing New and Existing Town and Local Centres														Many of our Association businesses have been in play for close to 50 years and have seen many changes in Manor Park. To maintain its growth, Investment is vital, as local businesses already feel that support is not forthcoming from Newham Council.		Comment noted. The Local Plan addresses this topic by supporting creation of business spaces in suitable locations, primarily as part of the designated network of town and local centres and on employment designated land. Policy HS2 addresses the need for space for local businesses through a range of measures, including by supporting multi-use of existing larger units, by requiring the provision of small affordable rent units in larger developments and by supporting temporary activation of empty high street units. Further, in recognition of the important role that local small businesses play as part of historically established high streets, certain exemptions from the nationally prescribed Sequential Test are also set out under policy HS3, while balancing the need to protect the vitality and viability of Newham's town and local centres. However, the Local Plan cannot support specific business interest, as that is not a planning matter.
Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/036a	High Street	HS2 Managing New and Existing Town and Local Centres			HS2.1											Part 1: TSP support Part 1 of the policy.		Support noted.
Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/036b	High Street	HS2 Managing New and Existing Town and Local Centres			HS2.2											Part 2 of the policy places a prescriptive requirement in terms of 80% of units being in Class E use in all town and local centres, and it is not considered that this would always be appropriate such as in the case of the Local Centre at Silvertown. The requirement should be deleted and the proportion of Class E use should be negotiated on a case-by-case basis having regard to wider policy requirements, and the outcome of Impact Assessments.		A change to this policy approach has not been made. We did not consider this change to be necessary as the approach is justified by the recommendations of the Retail and Leisure Study (2022) and supports the viability and vitality of Newham's centres. Further, Use Class E itself provides broad flexibilities of use. The extent to which the Silvertown local centre's extension would also contribute an extension to the designated existing local centre's Primary Shopping Area, including by meeting the Use Class E target, will depend on masterplanning in line with HS1.3 criteria, including the need for impact assessment. While preferable for place-making and neighbourhood integration, it is not necessary that the future extension of the centre provides also for an extension to its PSA, or the size of such an extension compared to the overall future local centre, and the case will need to be made through masterplanning processes. The Council is satisfied that the plan is sound without the proposed changes.

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Reg19 -E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/036c	High Street	HS2 Managing New and Existing Town and Local Centres			HS2. 6											[...]Part 6: The objective to encourage the provision of small units within the Town/Local Centre is supported, however, TSP opposes the prescriptive requirements for developments in Local Centres proposing 1,000sqm GIA or more of Class E development to deliver 10% of Class E floorspace small units marketed at discounted or turnover-based rents. This is likely to impact on the vitality of schemes, create vacancies and would give a commercial advantage to some occupiers. It is likely to deter Town and Local Centre development/redevelopment from coming forwards.		A change to this policy approach has not been made. We did not consider this change to be necessary as the Viability Assessment indicates that the requirement should not adversely impact on developers’ ability to bring schemes forward and meet other policy requirements. It further noted that there is no significant difference in the viability outcome between schemes of different scales and that, for practical purposes, schemes with a higher quantity of floorspace would more readily be able to provide the requirement. Further, the policy is justified by the Retail and Leisure Study Appendix 6 Topic Paper: SUPPORTING PROVISION OF AFFORDABLE SMALL BUSINESS PREMISES, and represents an important way in which the Local Plan meets its objective of supporting small businesses to contribute to the borough's economy as part of supporting thriving high streets (See IIA Appendix F, pg F100). The Council is satisfied that the plan is sound without the proposed changes.
Reg19 -E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/036d	High Street	HS2 Managing New and Existing Town and Local Centres			HS2. 6											Furthermore, the requirement for a “Vacancy Prevention Strategy” is not considered necessary. Rather than require more submission documents requiring assessment in applications, the focus should be to support Development Management to be able to determine applications quickly, reducing the impact of planning on the vacancy rate.		A change to this policy approach has not been made. We did not consider this change to be necessary as, as set out in our Reg 18 response on the same raised issue, our approach is justified. Authority monitoring indicates that a number of recent main town centre uses delivered within large scale mixed use developments have remained vacant for extended periods of time following delivery, sometimes for years, and including at Silvertown Local Centre. It is therefore imperative that the Local Plan process enables proactive management of this issues. The national Impact Test is not effective at testing the feasibility of the quantum and type of uses proposed as it is intended to only manage impact on the wider network. These additional tools help address this gap and are based on case studies showing they are effective at driving proactive management of main town centres uses floorspace. The benefits of having a meanwhile use approach to managing vacancies, or a Vacancy Prevention Strategy, are becoming more established, with positive evidence emerging from the High Streets Task Force and other case studies - please see Topic Paper: Managing Vacancies Through Meanwhile Use Strategies (2024) appended to the Retail and Leisure Study (2022). The Council is satisfied that the plan is sound without the proposed changes.

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Reg19 -E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/036e	High Street	HS2 Managing New and Existing Town and Local Centres			HS2. 7											Part 7: TSP does not consider Marketing Strategies for Class E units to be necessary. Rather than require more submission documents requiring assessment in applications, the focus should be to support Development Management to be able to determine applications quickly, reducing the impact of planning on the vacancy rate.		A change to this policy approach has not been made. We did not consider this change to be necessary as our approach is justified. As set out in our Reg 18 response on the same raised issue, our monitoring indicates that a number of recent main town centre uses delivered within large scale mixed use developments have remained vacant for extended periods of time following delivery, sometimes for years, and including at Silvertown Local Centre. The effectiveness of having a Marketing Strategy to prompt proactive market research and seeking occupier commitments has been demonstrated through current development management practice. For example, new Local Centre being delivered at Albert Basin (14/00664/OUT) includes a planning obligation for the developer to provide a Commercial Strategy to the Council for approval, which has prompted review of marketing approach following start of second phase of development (22/01505/S106), to support occupation of floorspace once completed. The policy aims to adopt this best practice approach for all developments including 2,500 sqm or more of main town centre uses floorspace, and particularly for developments delivering new Local Centres. The Council is satisfied that the plan is sound without the proposed changes.
Reg19 -E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/036f	High Street	HS2 Managing New and Existing Town and Local Centres			HS2. 9											Part 9: TSP supports the delivery of high-quality public realm in the vicinity of Local Centres.		Support noted.
Reg19 -E-207	Unibail-Rodamco-Westfield	DP9	Reg19-E-207/004	High Street	HS2 Managing New and Existing Town and Local Centres						No	No							The support for residential uses on the upper floors of mixed-use town centre development in Part 5 of draft Policy HS2 (Managing new and existing Town and Local Centres) is welcomed.		Support noted.
Reg19 -E-222	Ballymore	Rolfe Judd	Reg19-E-222/14	High Street	HS2 Managing New and Existing Town and Local Centres														Policy HS2: Managing new and existing Town and Local Centres Ballymore supports the delivery of affordable workspace within development which provide significant levels of employment floorspace, however, for all schemes proposing 1,000sqm or more (GIA) of Class E floorspace, Part 6 of the draft policy requires 10% of all Class E floorspace (including re-provision), to deliver 10% at a discounted rent. Previously, during the Regulation 18 consultation, we noted that any requirement for affordable commercial space should be based only on any uplift in floor area, rather than re-provision of existing floorspace. It is not clear in the wording of the policy whether this has been amended to exclude re-provision, as this is not explicitly stated.	We suggest this is further clarified (and excluded) from the above stipulation, reinstating previous wording identifying that this refers to uplift only.	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council’s response has not changed. For clarity, the policy continues to also apply to reprovided floorspace.

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Reg19 -E-222	Ballymore	Rolfe Judd	Reg19-E-222/15	High Street	HS2 Managing New and Existing Town and Local Centres														It is also noted that the 10% of Class E floorspace are identified as units comprising of (majority) 80-150sqm GIA each.	Ballymore reiterate the comments raised for Policy HS1 with regards to size restriction; we suggest this specification is removed from the policy wording, to make the updated flexibility as clear as possible.	A change to this policy approach has not been made. We did not consider this change to be necessary as the policy in intended to support small businesses, which primarily operate from smaller units in Use Class E, and is consistent with the approach set out in policy HS1. At the scale of 10% of overall floorspace, even in the case of creation of a new local centre, the policies operate well together, and the interrelations are further clarified in the implementation section of policy HS2. The Council is satisfied that the plan is sound without the proposed changes.

Reg19 -E-027	B&Q Limited	RPS	Reg19-E-027/004	High Street	HS3 Edge of Centre and Out of Centre			HS3.1			Blank	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>Evidence Base</p> <p>The London Borough of Newham, Retail & Leisure Study 2022 examined the pattern of retailing in the borough and the quantitative and qualitative need for new retail floorspace. 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.</p> <p>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 as 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</p>	<p>Policy HS3: Edge-of-Centre and Out-of-Centre retail, restaurants, cafes and services needs to be amended through the deletion of the last paragraph in Part 1 in its entirety as follows:</p> <p>“1. Small food stores meeting all the below criteria will be protected in Edge-of-Centre and Out-of-Centre locations, unless marketing evidence demonstrates no current or future demand for the site:</p> <p>a. the site is a ‘corner plot’; and</p> <p>b. the site is outside of the 400 metre radius of any Newham Town Centre Network designation; and</p> <p>c. there are no other corner food stores within a 400m radius around the site.</p> In all other circumstances, proposals for full loss of floorspace in retail (Ea), restaurants and cafes (Eb) and services (Ec) uses in edge of centre and out of centre locations will be supported, where replaced with alternative development in line with the policies of the Plan.” <p>If this proposal is not acceptable, the last paragraph in Part 1 should be amended to allow for a balanced consideration of the planning merits of the proposal taking into account meeting the floorspace needs of all land uses across the borough:</p> <p>“1. Small food stores meeting all the below criteria will be protected in Edge-of-Centre and Out-of-Centre locations, unless marketing evidence demonstrates no current or future demand for the site:</p> <p>a. the site is a ‘corner plot’; and</p> <p>b. the site is outside of the 400 metre radius of any Newham Town Centre Network designation; and</p> <p>c. there are no other corner food stores within a 400m radius around the site.</p> <p>Proposals for the redevelopment of other existing edge and out of centre retail (Ea), restaurant (Eb) and services (Ec) uses will only be supported where it is demonstrated that:</p> <p>i). There is a surplus of such accommodation and so its loss will not harm the established pattern of retailing in the borough or lead to the need to allocate sites for development of the same type elsewhere; or</p> <p>ii). the existing uses can be reprovided in accordance with the sequential test.</p> In all other circumstances, proposals for full loss of floorspace in retail (Ea), restaurants and cafes (Eb) and services (Ec) uses in edge of centre and out of centre locations will be supported, where replaced with alternative development in line with the policies of the Plan.”	<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. It 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, in a way that balances their out-of-centre status against meeting residents' needs for a variety of goods and services.</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 how we balance these objectives, has therefore drafted the following modification, which will be presented to the Inspector for their consideration, to HS3.1 implementation section:</p> <p>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.</p> <p>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:</p> <p>• Demonstrate optimisation of the existing</p>
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																			findings of the London Borough of Newham, Retail & 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 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. The plan also misinterprets the national 'town centres first' policy approach towards new retail development. The Implementation text to HS3.1 seeks to justify the policy support for the loss of retail (Ea), restaurants and cafes (Eb) and service (Ec) uses in undesignated areas as it is in accordance with the town centre first principles of the NPPF. The NPPF does not oppose existing retail development in edge or out of centre locations into town centres, or try to relocate such development within town centres, but simply requires new such development to be located in accordance with the sequential approach starting with a town centres. The approach of the local plan is consequently not supported by national planning policy.		built form (e.g. through introduction of a mezzanine or other internal alterations) for the benefit of specific occupier(s); and • 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 commitments.
Reg19 -E-112	SEGRO	Gerald Eve	Reg19-E-112/014	High Street	HS3 Edge of Centre and Out of Centre						Blank	No						Blank	SEGRO reiterates the representations made to the Regulation 18 version (part 4(a)) of the Local Plan [see Appended – Regulation 18 Draft Local Plan SEGRO response] where it is noted that draft Policies BFN1 and J1 acknowledge the role of intensifying out-of-centre retail and leisure parks for industrial uses. SEGRO suggest that a mirror reference is made within draft Policy HS3 for clarification.		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report, i.e. that your change has been taken forward in the implementation section of the policy. The Council's response has not changed.

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Reg19 -E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/037a	High Street	HS3 Edge of Centre and Out of Centre														Silvertown will play a vital role in delivering LB Newham’s 15-minute neighbourhood vision and address the deficit in amenities to existing communities in the Royal Docks area and ensure future residents of Silvertown Quays are adequately catered for. As highlighted above, an alternative approach to the traditional Town Centre hierarchy should be considered to help achieve this aim and prevent limitations to achieving this vision. Part 2: TSP welcome the inclusion of an exemption from a sequential test for listed and locally listed buildings with a non-residential use, where the proposals protect the asset’s significance and help secure a viable use.	Part 2: However, the proposed inclusion of a 300sqm threshold is not agreed with and should be deleted. Silvertown is an example of a site where it is appropriate to have some uses outside of the defined town centre (e.g. the dockside) and 300sqm is restrictive in this regard.	A change to this policy approach has not been made. We did not consider this change to be necessary, as the setting of a locally-appropriate threshold is supported by the NPPF and the London Plan, and the Retail and Leisure Study (2022) has recommended that the threshold should remain at 300sqm GIA in order to protect the vitality and viability of Newham's local centres. This has been a long-standing policy approach for Newham, which is working well, as demonstrated by the Retail and Leisure Study (2022) and policy monitoring. Policy HS3 allows for some flexibility to help the conservation of heritage assets, however this needs to be balanced with other objectives of the plan such as protecting the vitality and viability of Newham's town centres. There is no evidence to suggest that the benefits of allowing main town centre use activation of heritage assets will always outweigh potential harm to the vitality and viability of town centres. This will be assessed on a case by case basis. The Council is satisfied that the plan is sound without the proposed changes.
Reg19 -E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/037b	High Street	HS3 Edge of Centre and Out of Centre														Part 3: TSP have concerns in relation to the requirement for a retail and/or leisure impact assessment for development of 300sqm GIA or more of new or expanded floorspace. This is significantly below the nationally set threshold, and along with the requirement for a sequential test (Part 2), does not recognise the nuances of creating a successful and sustainable 15-minute neighbourhood.		A change to this policy approach has not been made. We did not consider this change to be necessary, as the setting of a locally-appropriate threshold is supported by the NPPF and the London Plan, and the Retail and Leisure Study (2022) has recommended that the threshold should remain at 300sqm GIA in order to protect the vitality and viability of Newham's local centres. This has been a long-standing policy approach for Newham, which is working well, as demonstrated by the Retail and Leisure Study (2022) and policy monitoring. The Council is satisfied that the plan is sound without the proposed changes.

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Reg19 -E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/037c	High Street	HS3 Edge of Centre and Out of Centre														Part 4: TSP understand the need for planning obligations and planning conditions to assist in ensuring development is appropriate for its location, but consider the requirements at part 4 of the policy should be considered on a case by case basis, rather than directed by policy.	(...)Part 4a should be expanded in terms of the potential for sites such as Silvertown to deliver night-time economy uses in a planned way that helps to reduce the decline in evening economy venues. Part 4b sets out that where the sequential test threshold is met, a planning condition or obligation should be imposed to “require the submission and approval of an adequately resourced Vacancy Prevention Strategy and/or Marketing Strategy.” Imposing this requirement through policy does not meet the planning condition or planning obligations tests, and it is not appropriate to use conditions/obligations to impose broad unnecessary controls.	A change to this policy approach has not been made. We did not consider this change to be necessary, as the changes would undermine the Council's ability to positively plan for the long term vitality and viability of its designated town centre network. The policy provides clarity on the approach that the Council is already taking to managing the long term impact of edge of centre/out of centre retail (Ea), restaurants and cafes (Eb) and services (Ec) uses through limiting use class flexibilities. Which changes of use under permitted development or the use class order will be deemed appropriate for an edge of centre or out of centre site to retain, will be a matter negotiated on a case by case basis, and the policy allows for this flexibility. Further, Main town centre uses, including those that facilitate an evening and night time economy, must be delivered in a justified and effective way to ensure they support their neighbourhoods and are successfully operated. This approach is taken for in-centre development through the requirement of a Vacancy Prevention Strategy and a Marketing Strategy at proportionate scales of development, and policy HS3.4b extends this requirement to out of centre development so that impacts can be managed holistically and consistently. The Council is satisfied that the plan is sound without the proposed changes.
Reg19 -E-095	Get Living Plc	Quod	Reg19-E-095/015	High Street	HS4 Markets and Events/Pop-Up Spaces						Blank	No						Blank	[Appendix 2 - Representations Part 1] GL welcomes the principles under Policy HS4 to support market activity and community wellbeing. The principle of a community hub to include a permanent pavilion or market/pop-up space at Victory Park in East Village was assessed and accepted under Application 23/00091/FUL. This application was approved for enhancements to key areas of public realm within East Village - Victory Park and the Belvedere. Within Victory Park, a pavilion of up to 200 sqm was approved to include a retail kiosk and café with outdoor covered seating to host a range of events to compliment the existing offer at East Village. Consideration must therefore be given to this in respect of Part 3b which requires evidence of market demand, or through temporary use testing of the concept over a period of at least 12 months.		Support noted. The policy is not relevant to the implementation of an approved scheme.

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Reg19-E-180	PEACH: The People's Empowerment Alliance for Custom House		Reg19-E-180/019	High Street	HS4 Markets and Events/Pop-Up Spaces						Blank	Blank							Blank	Markets and events/pop-up spaces In relation to policy HS4: We believe that development impacting on an existing market/retail sites should only be supported where existing traders/small-business owners are assisted to continue to trade and remain in the market/retail areas on a long-term basis, including with long-term reduced rents. This should be on the basis that they are accepted as material to the character of an area.		A change to this policy approach has not been made. We did not consider this change to be necessary as market stalls do not provide long term trading stability to individual traders (leases are usually short term, or up to 12 months), and therefore the policy cannot justifiably protect existing operators beyond the conditions of their existing trading leases. Instead, policy HS4 seeks to ensure that the market can continue to operate at pitch capacity through temporary arrangements, where this is necessary as part of a planning permission, and that the pitch capacity of the market is maintained or enhanced post-development. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/038a	High Street	HS4 Markets and Events/Pop-Up Spaces														The main policy focus is on protecting, encouraging and securing temporary events / pop ups and permanent markets in Local Centres which TSP supports. Further clarification is required regarding Part 2 (d), as while public engagement / co-design of temporary activities is supportable in principle, the process should be streamlined in order to not create a significant burden which could reduce the attractiveness of delivering such uses.		A change to this policy approach has not been made We did not consider this change to be necessary as the implementation section provides the necessary details and is sufficiently flexible and proportionately light-touch to not impede schemes coming forward. The Council is satisfied that the plan is sound without the proposed changes.	
Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/038b	High Street	HS4 Markets and Events/Pop-Up Spaces														TSP is concerned about the wording of 3.b which states that LBN will support permanent new markets or short-lease flexible use or events space within local centres if evidence is supplied to demonstrate market demand or through temporary use testing of the concept over a period of at least 12 months. TSP requests that wording of this is deleted so that such a requirement is not necessary for short-lease flexible use or events space.		A change to this policy approach has not been made. We did not consider this change to be necessary as the demand or 'testing of concept' criteria is consistent with principles set out in policy HS2 for Market testing and vacancy prevention through temporary activation, which are required in order to secure the long term vitality and viability of town and local centres in Newham by ensuring that the proposed use, through its operation, scale and location, has a reasonable chance of successfully drawing businesses as well as users. The policy is proportionate to the scope of proposals for the use as a permanent short-lease flexible use or events space. The Council is satisfied that the plan is sound without the proposed changes.	

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Reg19 -E-236	Friends of Queen's Market		Reg19-E-236/017	High Street	HS4 Markets and Events/Pop-Up Spaces						Blank	No						Blank	<p>The market’s need of repair</p> <p>7) When the Plan mentions Queen’s Market the need for its outward improvement is always mentioned. Policy HS4 in particular gives just two conditions for development that would impact a market. The second of these says development will be supported where:</p> <p>...b. The overall visibility, quality and management of the market and its public realm will be improved.’</p> <p>This holds an axe above the market because for the past ten to fifteen years it is the fault of the council that they have consistently failed to act on the calls of traders, shoppers and others to improve the market environment: clean it properly, paint it, repair the roof effectively, deal with leaks and the blocked drains, manage it correctly.</p> <p>The Newham Markets Strategy Review found yet again that simple cleaning was what people said was needed. Even now, with a £7.3 million 'Good Growth' grant for Queen’s Market, no real improvement has yet been seen. The roof still leaks but the grant apparently does not cover its repair.</p> <p>Yet the Good Growth grant has at least this year provided new toilets. Queen’s Square, the small outdoor space adjacent to the market building, has been redesigned and completed. A new manager’s office has been fitted out. The money has been given to the Market explicitly ‘to focus on upgrading the market to help improve its look, feel and function. These improvements are designed to improve the experience for both traders and shoppers and encourage more people to visit, spend and enjoy all that is on offer’ (co-create website Good Growth pages).</p> <p>The market is highly vulnerable within Policy HS4 and the policy needs to be changed. [...]</p> <p>When the Plan talks of introducing pop-ups and nighttime activities, this could have been happening for years and could still happen. The market does not need to be redeveloped in order to introduce those things: it needs to be cleaned and looked after if the Council is seeking to welcome more people in.</p>		<p>Comments noted. The current operational arrangements for Queens Market, including decisions on the spend of the grant funding, are not a material planning consideration. They nevertheless provide useful context for the purposes of addressing wider neighbourhood needs, which are addressed through policy N14 Green Street.</p> <p>A change to this policy approach has not been made. We did not consider this change to be necessary as the primary objective of policy HS4.1 is first and foremost to protect the viability and vitality of all existing markets within Newham. The policy is therefore necessarily more broad, and market-specific context will be taken into consideration as and when planning applications are submitted.</p> <p>The policy is positively prepared and justified by the findings and recommendations of the Retail and Leisure Study (2022), and the approach is supported by Newham's Markets Team. The Council is satisfied that the plan remains sound without the proposed changes.</p>

High Streets Comments to the [full Regulation 19 Representations](#)

[illegible]

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																				<p>the requirements of policies BFN2 and D1, and there is no need to introduce further engagement policy requirements in this circumstance, as the plan is applied in the round.</p> <p>However, the Council recognises the importance of ensuring the Plan is effective and clear, and has therefore made the following wording change to the implementation section of policy HS4.1, which is included in the modification table.</p> <p>[Introduce new paragraph at the start of HS4.1 implementation] A pitch is defined as a 3 by 3 meters area, unless otherwise agreed with the Council, in consultation with its Markets operations team.</p>	

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																					and clear, and has therefore made the following wording change to the implementation section of policy HS4.1, which is included in the modification table. [Introduce new paragraph at the start of HS4.1 implementation] A pitch is defined as a 3 by 3 meters area, unless otherwise agreed with the Council, in consultation with its Markets operations team.
Reg19-E-065	Stratford Original BID		Reg19-E-065/009	High Street	HS5 Visitor Evening and Night Time Economy						Blank	Blank						Blank	[Following our participation to two consultation events where we shared our feedback, I further submit a summary of points we discussed around the Local Plan. Most of the points do endorse Newham Local Plan Neighbourhoods/Inclusive Economy. There are some additional recommendations as expansion to existing points (i.e. Inclusive economy, J1 and active frontages). None of the following points challenge or question the soundness and legal ground of local plan review. These are as follows:] - A nighttime economy plan for Stratford town centre. This is a missed opportunity for Newham.		These comments do not relate to the tests of soundness and it is considered that this policy approach is sound. Policy HS5 would support such a strategy to come forward, as proportionate to the role that the planning system plays in the process of growing an evening and night time economy. However, an effective evening and night time strategy would need to be multi-disciplinary, going well beyond the planning system's remit, as recommended in the GLA's guidance on Developing a Night Time Strategy (see at https://www.london.gov.uk/programmes-strategies/arts-and-culture/24-hour-london/night-time-strategy-guidance).
Reg19-E-081	Metropolitan Police Service - Designing Out Crime		Reg19-E-081/007	Design	HS5 Visitor Evening and Night Time Economy						Blank	Blank						Blank	4) We would recommend any Policies that propose changes/improvements to the below areas also reference early engagement with the CTSAs: [- Crowded Places - Transport Infrastructure] - Class A Licenses Premises [- Utilities - Storage of Hazardous Materials - Iconic Buildings and; - Tall Buildings]	[An example would be Policy HS2: Managing new and existing town and local centres (pages 124-125) where this could be referenced in the Policy itself Section 9 (page 125) or within the Implementation Section HS2.9 (page 134).]	A change to this policy approach has not been made. We did not consider this change to be necessary as the proposed modification to implementation section for policy D1.3 sets out the need to engage with the Counter Terrorism Security Advisors where this has been identified as relevant. This is the most appropriate way to address these matters in all circumstances that involve operational development. Further, licensing law operates separately to the planning system that relies on Use Classes instead. The Council is satisfied that the plan remains sound without the proposed changes.

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Reg19-E-178	Royal Docks		Reg19-E-178/025	High Street	HS5 Visitor Evening and Night Time Economy						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: Given the presence of ExCeL, hotels, and the emerging development at Silvertown and the scale of residential growth in the Royal Docks, it would seem sensible to reflect the evening and night time visitor economy in the Royal Docks. In particular allowing activities to continue beyond 11pm in order to provide appropriate amenity with the principles of 15min cities.		A change to this policy approach has not been made. As responded in the Regulation 18 Local Plan Consultation Report, an Evening and Night Time Economy Zone for Silvertown Local Centre was considered as an option in the IIA (Appendix E, pg. E024), but not taken forward for the following reasons. Firstly, Silvertown Local Centre is recommended to retain a Local Centre scale following assessment of need through the Retail and Leisure Study (2022), and there is no further evidence to suggest a larger Town Centre designation would be appropriate in this location under current needs and commercial property market conditions. Secondly, the Royal Docks area does not benefit from sufficient night time public transport, with the DLR will not be operating as an all-night service and only one night bus servicing the south of the Royal Docks, between North Woolwich and Connaught Bridge only. Silvertown is allocated in the Plan to function as a Local Centre, and may develop an evening and night time offer commensurate with this designation. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-185	Hadley Property Group	Deloitte	Reg19-E-185/013	High Street	HS5 Visitor Evening and Night Time Economy														Policy HS5: Visitor Evening and Night Time Economy Hadley is encouraged by the aim for Stratford Metropolitan Town Centre’s night-time economy is recognised to be of regional significance, with support for culture, creative industries, leisure and a strong student base. This is supportive of Hadley’s aims for the development of the sites. Hadley agrees with the changes made in response to the Regulation 18 consultation to allow more flexibility to the location of specialist food markets, restaurants and cafes, in line with the NPPF and in context of Use Class E.		Support noted.
Reg19-E-194	London Borough of Tower Hamlets		Reg19-E-194/006	High Street	HS5 Visitor Evening and Night Time Economy														• HS5 – It should be noted that Hackney Wick has been designated as a night time economy centre of local significance in the Tower Hamlets Draft Local Plan. There is an opportunity for synergy in the night time economy between Hackney Wick and Stratford.		Comment noted.

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Reg19 -E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/039	High Street	HS5 Visitor Evening and Night Time Economy														Part 1, Table 4: TSP support the principle of an evening and night-time economy policy. However, it is noted that Table 4 only directs evening and night-time economy towards certain town centres. To enable the vibrancy of Town and Local Centres to respond to ever-changing retail and leisure markets, the policy should relate to all Town and Local Centres across the network. Silvertown Local Centre is identified as serving two key functions: for local residents and servicing visitors to the Excel centre. Supporting visitor evening and night-time economy at Silvertown is an important component to justly accommodate these functions and this should be recognised in policy.	Part 3: The restriction of ‘no more than a quarter of all units’ in Local Centres to be for visitor and night-time uses would confine the range of uses in centres, particularly as Table 5 defines a number of uses under evening and night-time economy uses (inter alia restaurants, cafes, pubs and bars, food markets, gyms and indoor leisure, museums, art galleries, cinema and theatres).Therefore, this requirement should be deleted. Table 5: With regards to Table 5, this directs different uses towards specific areas (e.g. inside or outside of primary shopping areas), and therefore further limits the flexibility between the uses. In directing restaurants and cafes towards primary shopping areas for example, this unduly prevents these uses to also be located outside these areas, which would be contrary to the aim of the 15-minute neighbourhood principles. Therefore, this requirement should be deleted.	A change to this policy approach has not been made. As responded in the Regulation 18 Local Plan Consultation Report, an Evening and Night Time Economy Zone for Silvertown Local Centre was considered as an option in the IIA (Appendix E, pg E024), but not taken forward for the following reasons. Firstly, Silvertown Local Centre is recommended to retain a Local Centre scale following assessment of need through the Retail and Leisure Study (2022), and there is no further evidence to suggest a larger Town Centre designation would be appropriate in this location under current needs and commercial property market conditions. Secondly, the Royal Docks area does not benefit from sufficient night time public transport, with the DLR will not be operating as an all-night service and only one night bus servicing the south of the Royal Docks, between North Woolwich and Connaught Bridge only. Silvertown is allocated in the Plan to function as a Local Centre, and may develop an evening and night time offer commensurate with this designation. The 25% ENTE uses for Local centre is proportionate, and reflective of the need to balance evening and night time operation with the more residential context of Local Centres that requires safeguarding of residential amenity. The policy is clear that the proportion will only impact on hours of operation conditions, and will not prevent further uses in these categories to come forward, where appropriate, with their hours generally limited to lawful operation up to the hours of 23:00 (i.e. not requiring a Licence). Your comments relating to table 5 are no longer relevant for the Submission draft Local Plan, as the table was moved to the implementation section and the locational guidance was removed, to allow for flexibility. The Council is satisfied that the plan is sound without the proposed changes.
Reg19 -C-007	Joana Simoes		Reg19-C-007/003	High Street	HS6 Health and Wellbeing on High Street						No	No						No	[...]. We have 400 plus chicken takeaway outlets in Newham which become third spaces between home and school. [...].		These comments do not relate to the tests of soundness and it is considered that this policy approach is sound. The Plan addresses the issue you have raised through policy HS6 which seeks to control the cumulative impacts of hot food takeaways. However, policies cannot be applied retrospectively to established land use patterns. Please also note that the Duty to Cooperate is a specific legal framework that applies to plan-making, and it is different to the legal requirement for consultation. Please refer to the Duty to Cooperate Statement (2024) for details about how the duty has been complied with.

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-030	Susan Masters		Reg19-E-030/002	High Street	HS6 Health and Wellbeing on High Street														While the cumulative impact restrictions on the spread of gambling outlets and fast food takeaways are appreciated, their belated arrival fails to address the issue of existing local saturation, merely ensuring that this crisis isn't worsened and allowing buildings with a preexisting license to continue to operate in this sphere even when the occupying business closes its doors.	To this effect I would like the granting of such permissions to be time or applicant-limited – if necessary through lobbying the government for a change in the law - forcing any new business moving into a premises with previous permissions to have to reapply – subject to our cumulative impact rules – until the level of distribution these rules lay out are met. If this isn't possible another option I would support would be to use changes a tightening of licensing laws to ensure healthier food offerings.	<p>Comment noted. However, the Local Plan cannot deliver the change you have requested as the planning system cannot be applied retrospectively. Further, the planning system works through establishing land uses and any design or management standards applicable to use classes, but the specific operation of a site an operator/business falls outside of the planning remit. The use of temporary permissions or applicant-limited conditions have historically been applied in very limited circumstances, and remain options available to the council if the NPPF conditions criteria are met. However, these conditions would still not be applicable to established uses.</p> <p>We consider that that the Plan's approach, to focus on clear spatial targets and qualitative standards, is effective, and over the long term may lead to the changes you are seeking.</p>
Reg19 -E-084	Betting Shop Operations Limited	FREETHS	Reg19-E-084/002	High Street	HS6 Health and Wellbeing on High Street						Yes	No						Yes	5. Having reviewed their options for re-occupation of a potential unit in the Forest Gate area, it is noted that emerging policy HS6 is extremely and unnecessarily restrictive on the principle of new betting shops and represents an unjustified barrier to entry in the area.		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the Plan provides an justified, positive and proportionate approach to managing the impacts associated with high concentrations of gambling premises, which does allow for new premises to be established where the criteria of the policy are met.</p> <p>The policy has been operating successfully as part of the existing Local Plan, and the evidence base, including the Retail and Leisure Study (2022) recommendations and authority monitoring reports, supports the continuation of the policy approach.</p> <p>The proliferation of betting shops, alongside other types of gambling premises, continue to be a significant concern for residents and elected members in the borough, as evident from the Engagement Reports supporting this Plan. Further, evidence was published by LGIU in a recent article written by Brent Council highlights the growing crisis of gambling addiction in Britain, with local governments struggling to manage the proliferation of gambling premises - Cllr Muhammed Butt, Empowering local councils to tackle gambling addiction, published by LGiU (Dec 2024), available from https://lgiu.org/blog-article/empowering-local-councils-to-tackle-gambling-addiction/#:~:text=Planning%20Applications%3A%20Allow%20councils%20to,food%20establishments%20in%20these%20areas.</p> <p>The Council is satisfied that the plan is sound without the proposed changes.</p>

Reg19 -E-084	Betting Shop Operations Limited		Reg19-E- 084/003	High Street	HS6 Health and Wellbeing on High Street													Yes	No									Yes	<p>6. The evidence base in the Retail and Leisure Study 2022 (Urban Shape, July 2022) is out of date and does not truly reflect the position within Forest Gate District Centre. If more recent evidence is used, this would actually justify a lower threshold than that proposed in Policy HS6. We also believe that the concern has been overstated in the policy wording and the recommendation provided by Urban Shape has been overlooked. We explain this position in detail below.</p> <p>Evidence Base does not justify the Policy</p> <p>7. As noted above, we have reviewed the Retail and Leisure Study (“the Study”) prepared by Urban Shape. We believe the Study does not reflect the current situation in the Forest Gate District Centre. In addition, we believe the Regulation 19 Plan policy HS6 is overstating the issue with regards to betting shops. To achieve soundness and a more flexible policy needs to be presented.</p> <p>8. Section 8 of the Study identifies 5no. betting shops in Forest Gate District Centre. However, the Study does not state where these shops are within the District Centre, nor who the operators are.</p> <p>9. It is evident from our own research that there are now only 3no. betting shops, with the Jennings shop at 49 Woodgrange Road and the William Hill at 37 Woodgrange Road closing in the last 2 years. As such, we consider that the Study is out of date and the policy is overly restrictive on betting shops which is not reflective of the current position in the District Centre. On this ground alone we do not consider that the policy is justified.</p> <p>10. Furthermore, in the Study, Urban Shape consider that 5no. betting shops represents “a strong representation for a centre of this size” (paragraph 8.15). However, as the actual situation is 3no. betting shops, this is not as such of a strong representation as depicted in the Study. There is also no established policy threshold to judge the proportion and number of betting shops in a given area to reach such a conclusion.</p> <p>11. Table 8.1 of the Study identifies that 20.4% of all units in the Forest Gate District Centre are Leisure Services. This is actually 4.2% below the UK average of 24.6%, therefore, we believe the issue with regards to the level of Leisure Services (or betting shops in particular) is overstated and it is considered that the policy wording is an overreaction to this evidence base.</p> <p>12. We have also reviewed other designated centres within the Study. All of the centres do not explicitly state there is an “issue” with an over concentration or proliferation of betting shops.</p> <p>13. It is noted that in the Green Street District Centre that there is a much lower level of Leisure Services (11.3% lower) in Green Street over the UK average (see paragraph 7.12). It is also noted in paragraph 7.12 there is an unbalance in those leisure services, however, it appears there is a large proportion of takeaways over other such services. We have noted 4no. betting shops in the Green Street centre, as such, we again consider the wording in emerging policy HS6 overstates any issues in respects to the level of betting shops across the centres.</p> <p>14. It is also noted that in some centres such as Canning Town (Section 9 of the Study), East Beckton / Beckton (Section 10) betting shops are not even mentioned in the analysis in the Study. Further to this, where the level of betting shops is mentioned, for example in Stratford (Section 5), there are only 5no. betting shops but this is</p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the Plan provides an justified, positive and proportionate approach to managing the impacts associated with high concentrations of gambling premises, which does allow for new premises to be established where the criteria of the policy are met. The policy has been operating successfully as part of the existing Local Plan, and the evidence base, including the Retail and Leisure Study (2022) recommendations and authority monitoring reports, supports the continuation of the policy approach.</p> <p>The proliferation of betting shops, alongside other types of gambling premises, continue to be a significant concern for residents and elected members in the borough, as evident from the Engagement Reports supporting this Plan. Further, evidence was published by LGIU in a recent article written by Brent Council highlights the growing crisis of gambling addiction in Britain, with local governments struggling to manage the proliferation of gambling premises - Cllr Muhammed Butt, Empowering local councils to tackle gambling addiction, published by LGiU (Dec 2024), available from https://lgiu.org/blog-article/empowering-local-councils-to-tackle-gambling-addiction/#:~:text=Planning%20Applications%3A%20Allow%20councils%20to,food%20establishments%20in%20these%20areas.</p> <p>The Council is satisfied that the plan is 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>not stated as an issue or concern.</p> <p>15. Therefore, we do not believe the evidence base depicts a serious issue across the London Borough of Newham with respects to the proliferation of betting shops in designated centres and shopping areas. The policy has been simply introduced as an unjustified barrier to entry for betting shops.</p> <p>16. The recommendations in the Study which specifically review betting shops are provided in LBN25, LBN32 and LBN33 (pages 144 and 148 of the Study). The key recommendations are found in LBN32 and LBN33 which relate to the level of non-E Class uses in primary or secondary shopping areas / frontages. Here, the recommendation states a 33% threshold for non-E Class uses. This seems a reasonable approach to the level of non-E Class uses rather than the strict restriction as seen in the draft wording in Policy HS6.</p> <p>17. It is not clear as to how the policy wording has now advanced to therefore being no more than 3no. gambling premises in a 400m radius (draft criterion b.) and no more than 2% of all uses in any centre (draft criterion f.). This is a far tighter restriction on gambling premises / betting shops than what is recommended in the Study. There is also no national or regional guidance on the application of such numerical and percentage based threshold to Local Plans and why they should operate in the interests of health and wellbeing. Both criterion should be removed as they are not justified and serve only to place unnecessarily high policy barriers to entry for betting shops (such as Jennings) that can otherwise be considered acceptable based on their responsible and well-established approach to the management of their uses. This can be regulated under criterion 3 which Jennings has no objection to and is in compliance with their established practice.</p>																			

High Streets Comments to the [full Regulation 19 Representations](#)

Reg19 -E-084	Betting Shop Operations Limited	FREETHS	Reg19-E- 084/004	High Street	HS6 Health and Wellbeing on High Street														Yes	No									Yes	<p>Policy is inconsistent with National Policy 18. It is also well documented that uses such as betting shops are an intrinsic and important part of the high street and designated centres, evidence of this can be found in recent London appeal decisions provided at Appendix 1. [see pg 6-10 of the representation; Appeal against Islington's refusal of permission for installation of a new shopfront, 1no. satellite dish and 1no. air conditioning unit, and against refusal of permission for installation of 2no. internally illuminated fascia signs and 1no. internally illuminated projecting sign] Having such a restrictive policy on betting shops being able to be situated in designated centres will only prove to be detrimental to the High Street and work against established and respected betting shop operators such as Jennings that have a recognised contribution towards the vitality and viability of centres.</p> <p>19. Traditionally betting shops are able to occupy smaller units. Such units due to their size and configuration may not be as useful or successful in supporting occupation by other retail or other similar high street uses. Therefore, the use of betting shops throughout a high street or in a designated centre play an important role in the diversity and vitality of a high street, ensuring that such smaller units do not remain unoccupied for any considerable length of time. This is contrary to the town centre objectives of the National Planning Policy Framework and therefore inconsistent with national policy.</p> <p>20. As a result, we believe that there is no justification for the threshold applied to policy HS6 and that the proliferation of betting shops across the London Borough Newham has been overstated. We therefore would strongly urge the Inspector to examine the wording of emerging policy HS6 as it goes against the recommendation as per the Study in evidence base.</p>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the Plan provides an justified, positive and proportionate approach to managing the impacts associated with high concentrations of gambling premises, which does allow for new premises to be established where the criteria of the policy are met. The policy has been operating successfully as part of the existing Local Plan, and the evidence base, including the Retail and Leisure Study (2022) recommendations and authority monitoring reports, supports the continuation of the policy approach.</p> <p>The proliferation of betting shops, alongside other types of gambling premises, continue to be a significant concern for residents and elected members in the borough, as evident from the Engagement Reports supporting this Plan. Further, evidence was published by LGIU in a recent article written by Brent Council highlights the growing crisis of gambling addiction in Britain, with local governments struggling to manage the proliferation of gambling premises - Cllr Muhammed Butt, Empowering local councils to tackle gambling addiction, published by LGiU (Dec 2024), available from https://lgiu.org/blog-article/empowering-local-councils-to-tackle-gambling-addiction/#:~:text=Planning%20Applications%3A%20Allow%20councils%20to,food%20establishments%20in%20these%20areas.</p> <p>The Retail and Leisure Study (2022) continues to support the Council's position that betting shops must be managed as part of the Local Plan process, as per recommendations LBN32 and LBN33.</p> <p>Our latest town centres surveys, undertaken in summer 2024, indicate that there were 4 gambling premises operating in Forest Gate town centre (a reduction of one from previous monitoring), representing 2% (upwards rounded) of all non-residential units in the centre. All 4 units operated from typical historic shop units, and there were many other similar units in the centre that operated in other uses. We do not consider your argument that betting shop premises could not become another use to be defensible. Further, this monitoring demonstrates that the level of provision in Forest Gate of gambling premises is at a reasonable level, and that the policy position is justified and deliverable.</p> <p>The Council have reviewed the evidence you have provided in the form of appeals in the London borough of Islington, and note that the scope of the proposals was alterations to the premises, and not the principle of the use on site. We therefore do not consider these to be relevant in the argument you are trying to make. Notwithstanding, Newham's context is different, including on the basis of the established policy which restricts betting shop concentrations in the borough, and which is being taken forward as part of policy HS6.1b. The Council is satisfied that the plan is sound.</p>
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Reg19-E-084	Betting Shop Operations Limited	FREETHS	Reg19-E-084/005	High Street	HS6 Health and Wellbeing on High Street						Yes	No						Yes	<p>Conclusion & Recommendations</p> <p>21. Based on the above assessment, it is clear that the direction that policy HS6 is taking in terms of its restrictive nature on betting shops will be detrimental to the high street and overall district centres. It is also based on an unsound and inaccurate evidence base, in particular for Forest Gate, where there are now only 3no. betting shops, rather 5no and a percentage restriction. The draft policy is unsound as it is not justified and inconsistent with national policy.</p> <p>22. Furthermore, as can be seen throughout the Study, the proliferation of betting shops throughout the London Borough Newham is not a stark issue. Whilst control on the total numbers of betting shops is an understandable approach, the wording of policy HS6 is overly restrictive on the basis of recommendations LBN32 and LBN33.</p>	23. As such, we recommend the appointed Inspector considers deletion of criterion b. and f. Both are necessary as a minimum to for this policy achieve soundness.	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the Plan provides a justified, positive and proportionate approach to managing the impacts associated with high concentrations of gambling premises, which does allow for new premises to be established where the criteria of the policy are met. The policy has been operating successfully as part of the existing Local Plan, and the evidence base, including the Retail and Leisure Study (2022) recommendations and authority monitoring reports, supports the continuation of the policy approach=.</p> <p>The proliferation of betting shops, alongside other types of gambling premises, continue to be a significant concern for residents and elected members in the borough, as evident from the Engagement Reports supporting this Plan. Further, evidence was published by LGiU in a recent article written by Brent Council highlights the growing crisis of gambling addiction in Britain, with local governments struggling to manage the proliferation of gambling premises - Cllr Muhammed Butt, Empowering local councils to tackle gambling addiction, published by LGiU (Dec 2024), available from https://lgiu.org/blog-article/empowering-local-councils-to-tackle-gambling-addiction/#:~:text=Planning%20Applications%3A%20Allow%20councils%20to,food%20establishments%20in%20these%20areas. The Retail and Leisure Study (2022) continues to support the Council's position that betting shops must be managed as part of the Local Plan process, as per recommendations LBN32 and LBN33. Our latest town centres surveys, undertaken in summer 2024, indicate that there were 4 gambling premises operating in Forest Gate town centre (a reduction of one from previous monitoring), representing 2% of all non-residential units in the centre. This monitoring demonstrates that the level of provision in Forest Gate of gambling premises is at a reasonable level, and that the policy position is justified and deliverable.</p>
Reg19-E-190	Manor Park Business Association		Reg19-E-190/006	High Street	HS6 Health and Wellbeing on High Street														There should be a control on Take Aways and Eateries as, there are so many along Romford Road in Manor Park.		<p>These comments do not relate to the tests of soundness and it is considered that this policy approach is sound. The Plan addresses the issue you have raised through policy HS6 which seeks to control the cumulative impacts of hot food takeaways. However, policies cannot be applied retrospectively to established land use patterns.</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-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/040	High Street	HS6 Health and Wellbeing on High Street														The principle of supporting health and wellbeing through land use control is supported. However, with reference to hot food takeaways there is some concern regarding a ‘one size fits all approach’ in relation to the location and concentration of such uses. While it is expected that the proposals for Silvertown would generally comply with this draft policy, a small hot food takeaway allowance (500sqm) is sought, and it is considered to contribute to the placemaking strategy for the site. Hot food takeaways are not automatically unhealthy, and Silvertown may attract hot food takeaway businesses offering healthy food in line with the Healthy Catering Commitment (or similar accreditation).	The policy wording should be updated to support a small provision of hot food takeaways on appropriate strategic sites.	A change to this policy approach has not been made. We did not consider this change to be necessary as the policy is justified and has been effective at managing the potential impacts on new takeaways under the existing and the previous Local Plans. Hot food takeaways are not considered to be essential for the vitality and viability of Newham's town and local centres, and therefore there is no need to promote them on strategic sites. As you also indicated, the policy criteria does allow for new takeaways to be created in areas where the concentration trigger points have not been reached and where not located in proximity to schools, and in such cases the quality of the offer will be managed through the Heathier Catering Commitment (or similar locally supported standard) accreditation requirement. The suitability of hot food takeaways in Silvertown will be assessed through development management processes, including masterplanning. The Council is satisfied that the plan is sound without the proposed changes.
Reg19 -E-236	Friends of Queen's Market		Reg19-E-236/015	High Street	HS6 Health and Wellbeing on High Street						Blank	No						Blank	3) Policy HS6 Health and Wellbeing on the High Street supports affordable food and states in 3.104-5 'There is an ongoing need to create a healthy food and drink environment, addressing affordability [sic] and access’. and ‘Public Health research indicates that increased access to healthy, affordable food for the general population is associated with improved attitudes towards healthy eating and healthier food purchasing behaviour.’	The chapter seems driven by a focus on hot food takeaways. Queen’s Market could and should be mentioned and linked to within this chapter.	This wording change is not supported. We did not consider this change to be necessary as the role of markets is appropriately addressed in policy HS4 and does not fall within the specific scope of policy HS6, which is to promote healthier food standards and respond to the cumulative impacts of the proliferation of hot food takeaways. Policy HS4 implementation already references the need for food provision in markets to have regards to the requirements of policy HS6. The plan is applied in the round and there is no need to duplicate policies. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19 -E-236	Friends of Queen's Market		Reg19-E-236/025	High Street	HS6 Health and Wellbeing on High Street						Blank	No						Blank	[5. Locations for remedies] HS6 Health and Wellbeing on the High Street p143 [Supporting documents should include: Newham Markets Strategy and Policy Review (as above at 1A) Leeds University Markets4People Study (as above at 1E) GLA Understanding London’s Markets (2017) Remedies summarised below (these appear in the above text with more supporting detail)]	[5. Locations for remedies] Policy HS6: Queen’s Market should be mentioned and linked to within this chapter.	This wording change is not supported. We did not consider this change to be necessary as the role of markets is appropriately addressed in policy HS4 and does not fall within the specific scope of policy HS6, which is to promote healthier food standards and respond to the cumulative impacts of the proliferation of hot food takeaways. Policy HS4 implementation already references the need for food provision in markets to have regards to the requirements of policy HS6. The plan is applied in the round and there is no need to duplicate policies. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19 -E-013	Transport for London		Reg19-E-013/014	High Street	HS7 Delivery-led businesses			HS7.3 and HS7.4											We reiterate support for the requirements in part 3 b and c and part 4 d and e which are further explained in the implementation section.		Support 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-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/041	High Street	HS7 Delivery-led businesses														The HPA proposals for Silvertown include an allowance for commercial kitchen and delivery centre use (referred to as 'dark kitchens' in the policy text) and/or storage and distribution micro-fulfilment-type uses towards the east in the area referred to as Silverworks.	Parts 1 and 2 of the policy should include reference to such uses being acceptable in “suitable locations within strategic sites”, given there is agreement that Silvertown could host industrial uses (as referred to in the draft site allocation).	Unfortunately it was not clear what comment you were making on this part of the Plan, as the support for location as part of site allocations is already part of the policy criteria in HS7 parts 1b and 2b.
Reg19 -E-244	One Newham		Reg19-E-244/040	High Street	HS7 Delivery-led businesses														NEWway I welcome the flexibility on centralising service delivery to ‘town centres.’ On the whole, delivering services from easily assessable locations makes sense.		Support noted.

Reg19 -E-062	THESET LTD	Stantec	Reg19-E-062/002	High Street	HS8 Visitor accommodation											No	No					No	Yes	<p>THESET LTD has an interest in 190-194 High Street, Stratford, E15 2NE (the “Site”) which consists of a pair of mid-twentieth century three-storey brick-built terraced buildings with commercial uses at ground level, including an estate agent, a dental clinic and beauty salon. The surrounding area is varied, with built form being a mix of uses including commercial, residential and hotel accommodation ranging from 7 to 27-storeys in heights.</p> <p>Summary</p> <p>These representations demonstrate to LBN that:</p> <p>a. The Site is located in an area that is appropriate for a hotel-led, mixed-use scheme and is supported by strategic policy; and</p> <p>b. LBH has not identified enough deliverable sites to meet the needs of hoteliers and visitors to Stratford, contrary to London Plan policy.</p> <p>THESET LTD therefore conclude that the Draft Submission Local Plan (Regulation 19) June 2024:</p> <ul style="list-style-type: none">• Does not currently accord with Policy E10 of the London Plan, which is the most recently adopted development under the Section 38(3B)(5) of the Planning and Compulsory Purchase Act 2004; and• Does not meet the ‘soundness’ test set out in paragraph 35 of the National Planning Policy Framework (NPPF, 2023). <p>Summary</p> <p>These representations demonstrate to LBN that:</p> <p>a. The Site is located in an area that is appropriate for a hotel-led, mixed-use scheme and is supported by strategic policy; and</p> <p>b. LBH has not identified enough deliverable sites to meet the needs of hoteliers and visitors to Stratford, contrary to London Plan policy.</p> <p>THESET LTD therefore conclude that the Draft Submission Local Plan (Regulation 19) June 2024:</p> <ul style="list-style-type: none">• Does not currently accord with Policy E10 of the London Plan, which is the most recently adopted development under the Section 38(3B)(5) of the Planning and Compulsory Purchase Act 2004; and• Does not meet the ‘soundness’ test set out in paragraph 35 of the National Planning Policy Framework (NPPF, 2023).	<p>The comment you have provided has not resulted in a change. We did not consider this change to be necessary as the Local Plan provides a positive and effective framework for meeting demand for hotels in the borough, in a way which aligns with the NPPF and the London Plan on supporting the local visitor economy, while also balancing other needs, particularly for housing, as stated in the justification section of policy HS8.</p> <p>Visitor accommodation is a main town centre use under the NPPF, and is therefore guided by the 'town centres first principles'. Policy HS8 aligns with this approach of the NPPF. We do not agree with the provided interpretation of Policy E10 of the London Plan. While supporting the potential of Opportunity Areas as suitable for visitor accommodation growth, this policy also refers to policy SD7 in terms of the management of the town centres network, which sets out that main town centre uses would be directed sequentially, to town centres first, in line with the national approach. Policy E10 therefore does not exclude visitor accommodation from undertaking a sequential test when the proposal is not located in a town centre, even if is part of an opportunity area. The Council considered that the spatial strategy set out in the policy is consistent with the NPPF and the London Plan, and note the GLA have not raised any concerns regarding this policy.</p> <p>Newham forms part of the wider London tourism market, and the evidence for further growth and resulting London-wide visitor accommodation gross room demand is set out in the evidence to the London Plan. Until such time as a new study is published by the GLA, the 'Projections of demand and supply for visitor accommodation in London to 2050' (2017) provides the growth framework for Newham. It sets out that the projected net demand for visitor accommodation rooms in Newham (including the LLDC area) between 2015 and 2041 is 3,031. Between 2015-2023, a total of 2,192 rooms have been completed, with a further 1,085 rooms in the pipeline, as set out in the published Newham and LLDC monitoring reports. However, the Council notes that Newham has seen high demand for hotels development in recent years, at a time when the borough is also providing the highest level of temporary accommodation in the country, a proportion of which is provided in hotel or bed and breakfast accommodation. With substantial development in town centres planned over the Local Plan period, the Council considers that the spatial strategy and overall approach to delivery of further visitor accommodation in the borough is justified and proportionately balanced against other competing needs, particularly general needs housing.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p> <p>However this policy approach to managing demand for hotels can be more clearly set out in the implementation, to better coordinate with policy H1 and clarify how demand for</p>
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[illegible]

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>the high need for general needs housing in the borough, in line with the approach set out in policy H1.3 of this Local Plan. The London Plan (2021) estimates that London will need to build an additional 58,000 bedrooms of serviced accommodation by 2041, delivered primarily within the Central Activity Zones, but also increasingly in town centres more broadly. The study allocates a share of the need to Newham equating to 5.2 per cent or 3,031 net rooms. Latest monitoring indicates that 1,373 2,192 rooms have already been delivered, with a further 483 1,085 in the pipeline as of 2022/23. The policy therefore requires market demand testing that reflects Newham's economic growth and tourism demand, to ensure there is not an over delivery of visitor accommodation and land is protected for other priority uses.</p>

High Streets Comments to the full Regulation 19 Representations																			
Reg19 -E-062	THESET LTD	Stantec	Reg19-E-062/006	High Street	HS8 Visitor accommodation												Blank	Blank	<p>2. Background Context</p> <p>2.1 Hotel proposals that are located in ‘opportunity areas’, even if they are located outside of a town centre, are supported by Policy E10 (Visitor Infrastructure) of the London Plan (2021) which is the most up-to-date policy document in the context of Section 38(3B)(5) of the Planning and Compulsory Purchase Act 2004. LBN’s emerging policy should, therefore, be consistent with London Plan policy.</p> <p>2.2 An extract from Part G of Policy E10 is set out below:</p> <p>“In outer London and those parts of inner London outside the CAZ, serviced accommodation should be promoted in town centres <u>and within Opportunity Areas</u> (in accordance with the sequential test as set out in Policy SD7 Town centres: development principles and Development Plan Documents) <u>where they are well-connected by public transport, particularly to central London</u>” [our emphasis].</p> <p>[2. Background Context]</p> <p>2.3 In terms of applying Policy E10 of the London Plan, it supports hotel proposals in opportunity areas and therefore negates the need for a sequential test. This matter was specifically discussed with the Inspector responsible for testing the soundness of the London Plan on 20th March 2019 (as explained in the recording link below(1)). At 5.11.15 on the recording the Inspector says, in terms of Policy E10, it gives ‘equal weight to town centres and opportunity areas’. The expert witness then agrees with the Inspector, bearing in mind it was the Inspector’s point. When the Greater London Authority’s (GLA) barrister responds, he doesn’t discuss this matter any further. This was explained to LBN in a planning advice note issued to them on 4th June 2024.</p> <p>[Note: 1: https://www.dropbox.com/scl/fi/9487ej2w0e6hxar8yxe8o/EiP-20-March-2019-4.wav?rlkey=juc983cqb6eleh5m96d4e4k4i&dl=0]</p> <p>2.4 Stantec have recently undertaken discussions with the GLA in relation to the hotel-led, mixed-use proposals in a similar location. The GLA’s formal pre-application response (see Appendix 1) [see Appendix p. 11] confirms that a hotel use on the Site is supported by Policy E10 of the London Plan. An extract of this response is set out below:</p> <p>“London Plan policy E10 supports the provision of hotel uses in town centres and opportunity areas, where they are well-connected by public transport, particularly to central London. This site is just outside of the Metropolitan town centre boundary but is highly accessible to public transport, and is within an Opportunity Area with close access to visitor attractions within the Queen Elizabeth Park. The hotel use in this location is appropriately located and would not raise strategic objections, therefore”</p> <p>2.5 Stantec also followed up the GLA’s response with email to the GLA containing a clarification query. The GLA confirmed by reply email (see Appendix 2) [see Appendix 2 at p.18] that a hotel-led proposal on a site located within an Opportunity Area, but outside a town centre boundary, would not need to be supported by a ‘sequential test’ in order to accord with the objectives of Policy E10 of the London Plan.</p> <p>2.6 The London Plan, adopted March 2021, is the ‘most up-to-date’ development plan document. Section 38(3B)(5) of the Planning and Compulsory Purchase Act 2004 explains that where there is a ‘conflict’ between different</p> <p>Comment noted.</p> <p>We note that the policy advice you have shared is from a GLA development management officer, rather than the GLA's London Plan policy team. We therefore give limited weight to this interpretation of the London Plan policy E10, as officers working on development management cases will make their own interpretation of the policy in the context of the proposal they are assessing.</p> <p>As set out in the GLA's response to the Reg 19 consultation, and in the SOCG between the two parties, Newham is not over-delivering homes, and will continue to be required to deliver a higher level of housing need than its own population growth.</p> <p>Thank you also for sharing a visitor accommodation demand assessment. We have not considered it relevant to assess this in any detail as part of the plan-making process, as the requirement for visitor accommodation proposals to be supported by an up-to-date demand assessment is a requirement of existing policy which is being carried forward in the new Plan. Your submission demonstrates that this requirement is an effective tool for planning application decision making that allows the policy to retain a degree of flexibility while remaining effective at guiding growth for this type of development.</p> <p>Visitor accommodation is a main town centre use under the NPPF, and is therefore guided by the 'town centres first principles'. Policy HS8 aligns with this approach of the NPPF. We do not agree with the provided interpretation of Policy E10 of the London Plan. While supporting the potential of Opportunity Areas as suitable for visitor accommodation growth, this policy also refers to policy SD7 in terms of the management of the town centres network, which sets out that main town centre uses would be directed sequentially, to town centres first, in line with the national approach. Policy E10 therefore does not exclude visitor accommodation from undertaking a sequential test when the proposal is not located in a town centre, even if is part of an opportunity area. For example, the recently adopted Islington Local Plan (2023) policy R12 also takes the town centre first approach, and provides a much more restrictive policy than that of Newham's Local Plan, in response to Islington's specific context of need and priorities for a range of uses. The Council considered that the spatial strategy set out in the policy is consistent with the NPPF and the London Plan, and note the GLA have not raised any concerns regarding this policy.</p>

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																			documents in the development plan, the latest plan prevails. In this case, the London Plan E10 policy prevails over other visitor-related spatial policies previously adopted by the London Legacy Development Corporation (LLDC). 2.7 Attached is a legal opinion (see Appendix 3) [see Appendix at p. 22] prepared by Victoria Hutton of 39 Essex Chambers which concludes: <ul style="list-style-type: none">• I consider that it is of note that the GLA (whose policy E10 is) agrees with the interpretation of applying Policy E10. I have also been provided with an audio recording of the examination into the London Plan. It is equally of note that the Inspector examining the plan agreed that policy E10G placed Opportunity Areas and Town Centres on an equal footing;• The London Plan, adopted March 2021, is the most recent development plan document. In this case, conflict between policy E10G of the London Plan and policy B2 of the LLDC Local Plan should be resolved in favour of policy E10G;• It is incorrect to treat a draft allocation as having the same force, in law, as an allocation within an adopted development plan. Section 38(6) Planning and Compulsory Purchase Act 2004 ('PCPA 2004') states that decisions should be taken in accordance with the development plan unless material considerations indicate otherwise;• It is therefore clear to me that LBN cannot ignore evidence that the site allocation is not viably deliverable. This is an issue which goes to soundness and viability and deliverability is an issue which the Planning Inspectorate's (PINS) guidance explicitly states should be paid careful attention to; and• I would expect that LBN will want to consider the potential impact of continuing to pursue a local plan which significantly over-provides for housing when considered against the Government's latest housing need figures. This is likely to include the viability of delivering so much housing and whether, in practice, it will be difficult to defend many of the housing allocations if they are, in fact, not required to meet housing needs. 2.8 The representations set out in Sections 3 and 4 below should be considered under the above context. This context will be referred to as the 'background context' when relevant, rather than re-writing this context for each representation.		

Reg19 -E-062	THESET LTD	Stantec	Reg19-E-062/014	High Street	HS8 Visitor accommodation							No	No	No			No	No	Blank	<p>[3. Draft Local Plan (Part 1) - Representations] B Pages 149 to 151 – Policy HS8 (Visitor accommodation)</p> <p>Objection:</p> <ul style="list-style-type: none">Contrary to the objectives of Policy E10 and paragraph 6.10.02 of the London PlanContrary to paragraph 35 (a) – positively prepared – of the NPPF <p>Amendments required: Yes, as suggested below.</p> <p>3.8 Please refer to the Background Context in Section 2 above, particular in relation to the fact that Policy E10 supports hotel proposals in opportunity areas and therefore negates the need for a sequential test.</p> <p>3.9 In addition, the THESET LTD are aware that:</p> <ul style="list-style-type: none">Paragraph 6.10.2 of the London Plan highlights:<ul style="list-style-type: none">The importance of tourism to London’s economy and that London needs to ensure that it is able to meet the accommodation demands of tourists who want to visit the capital; andIt is estimated that London will need to build an additional 58,000 bedrooms of serviced accommodation by 2041, which is an average of 2,230 bedrooms per annum.Policy E10 of the London Plan seeks to strengthen London’s visitor economy and associated employment by enhancing and extending its attractions, inclusive access, legibility, visitor experience and management and supporting infrastructure, particularly to parts of outer London well-connected by public transport, taking into account the needs of business as well as leisure visitors. <p>3.10 THESET LTD have concluded that LBN has failed to consider the needs of hoteliers and visitors and has not therefore adequately planned for its needs in the draft Local Plan and its evidence base, as required by Policy E10 and paragraph 6.10.2 of the London Plan.</p> <p>3.11 The hotel demand assessment found in Appendix 4 demonstrates that there is a high-level of demand in the High Street, Stratford area. By allowing more hotel development in this area, this will help to support the other town centre uses and will attract more visitors to London and the adjacent Stratford Metropolitan Town Centre.</p> <p>3.12 In light of the above, THESET LTD conclude that draft Policy HS8 (Visitor accommodation) of the Draft Submission Local Plan (Regulation 19) June 2024:</p> <ul style="list-style-type: none">Does not currently accord with Policy E10 and paragraph 6.10.2 of the London Plan; andDoes not currently accord meet the ‘positively prepared’ test set out in paragraph 35 of the NPPF.	<p>THESET LTD’s Suggested Amendments:</p> <p>3.13 THESET LTD seeks LBN’s agreement to revise draft Policy HS8 by adding a new bullet point, as follows, to ensure it is consistent with Policy E10 of the London Plan and to meet the needs of hoteliers and visitors in this location:</p> <p>“Hotels and other forms of visitor accommodation will be supported in:</p> <p>a. Town and Local Centres outside of the Primary Shopping Area, and principally within centres in Stratford and Maryland Neighbourhood as a key tourist destination; and or</p> <p>b. Parts of Opportunity Areas where they are well-connected by public transport; or</p> <p>b.c. Areas within 15 minutes walking distance to the Excel conference centre”.</p>	<p>The comment you have provided has not resulted in a change. We did not consider this change to be necessary as the Local Plan provides a positive and effective framework for meeting demand for hotels in the borough, in a way which aligns with the NPPF and the London Plan on supporting the local visitor economy, while also balancing other needs, particularly for housing, as stated in the justification section of policy HS8.</p> <p>Visitor accommodation is a main town centre use under the NPPF, and is therefore guided by the 'town centres first principles'. Policy HS8 aligns with this approach of the NPPF. We do not agree with the provided interpretation of Policy E10 of the London Plan. While supporting the potential of Opportunity Areas as suitable for visitor accommodation growth, this policy also refers to policy SD7 in terms of the management of the town centres network, which sets out that main town centre uses would be directed sequentially, to town centres first, in line with the national approach. Policy E10 therefore does not exclude visitor accommodation from undertaking a sequential test when the proposal is not located in a town centre, even if is part of an opportunity area. The Council considered that the spatial strategy set out in the policy is consistent with the NPPF and the London Plan, and note the GLA have not raised any concerns regarding this policy.</p> <p>Newham forms part of the wider London tourism market, and the evidence for further growth and resulting London-wide visitor accommodation gross room demand is set out in the evidence to the London Plan. Until such time as a new study is published by the GLA, the 'Projections of demand and supply for visitor accommodation in London to 2050' (2017) provides the growth framework for Newham. It sets out that the projected net demand for visitor accommodation rooms in Newham (including the LLDC area) between 2015 and 2041 is 3,031. Between 2015-2023, a total of 2,192 rooms have been completed, with a further 1,085 rooms in the pipeline, as set out in the published Newham and LLDC monitoring reports. However, the Council notes that Newham has seen high demand for hotels development in recent years, at a time when the borough is also providing the highest level of temporary accommodation in the country, a proportion of which is provided in hotel or bed and breakfast accommodation. With substantial development in town centres planned over the Local Plan period, the Council considers that the spatial strategy and overall approach to delivery of further visitor accommodation in the borough is justified and proportionately balanced against other competing needs, particularly general needs housing.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p> <p>However this policy approach to managing demand for hotels can be more clearly set out in the implementation, to better coordinate with policy H1 and clarify how demand for</p>
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																					<p>the high need for general needs housing in the borough, in line with the approach set out in policy H1.3 of this Local Plan. The London Plan (2021) estimates that London will need to build an additional 58,000 bedrooms of serviced accommodation by 2041, delivered primarily within the Central Activity Zones, but also increasingly in town centres more broadly. The study allocates a share of the need to Newham equating to 5.2 per cent or 3,031 net rooms. Latest monitoring indicates that 1,373 2,192 rooms have already been delivered, with a further 483 1,085 in the pipeline as of 2022/23. The policy therefore requires market demand testing that reflects Newham's economic growth and tourism demand, to ensure there is not an over delivery of visitor accommodation and land is protected for other priority uses.</p>

High Streets Comments to the full Regulation 19 Representations																			
Reg19 -E-096	Redefine Hotels Portfolio IV Ltd	Savills	Reg19-E- 096/033	High Street	HS8 Visitor accommod ation														
					Draft Policy HS8 (Visitor Accommodation) sets out that “hotels and other forms of visitor accommodation will be supported on sites in: a) town and local centres where the function of the primary shopping area is protected in line with Local Plan Policy HS2, and principally within centres in Stratford and Maryland; b) areas within 15 minutes walking distance to the ExCel conference centre”. It sets out that “the scale of development should be proportionate to the scale of the centre and/or the tourism or employment function of the area it services, as relevant to the site, justified by market demand testing and a Sequential Test if proposed in an out of centre location. The development should be supported by a Visitor Accommodation Management Plan outlining: a) how amenity and safety will be managed and maintained through the day and at night; b) a servicing plan”. We are supportive of the provision of hotels, as a main town centre use, in town centre locations, including Canning Town District Centre. We are also supportive of the provision of hotel accommodation being provided proportionate to the demand, and a hotel needs assessment will be submitted to support our forthcoming planning application.														<p>Support noted. However this policy approach also received comments which raised concerns regarding the ability of the Local Plan to support the demand for hotels in the borough, while others also raised concerns with Newham's housing delivery to respond to the significant need, particularly for social housing. Further, the Council notes that Newham has seen high demand for hotels development in recent years, at a time when the borough is also providing the highest level of temporary accommodation in the country, a proportion of which is provided in hotel or bed and breakfast accommodation.</p> <p>In light of these point, the Council recognises the importance of ensuring the Plan is positively prepared and effective in balancing a range of competing needs and therefore made the following clarification modification which is included in the modifications table.</p> <p>[HS8.2 implementation] Where the demand justifies an edge of centre or out of centre locations as per the criteria above, a Sequential Test will also be required in line with the NPPF, [remove duplication of HS8.1 implementation and replace with] When reviewing evidence of market demand for new or intensified visitor accommodation, the council will take a balanced view with regards to the demonstrated demand at the location compared to the pipeline of visitor accommodation in the borough and any Newham-specific share of change in gross room demand set out as part of the London Plan evidence base. Where the Council deem that needs are already being met through the pipeline, granting permission for visitor accommodation proposals that do not meet the spatial strategy of this plan, including the prioritisation of sites for housing set out in H1.3, will rarely be justifiable.</p> <p>Where existing visitor accommodation capacity is taken up by people owed a homelessness duty, by Newham or any other public sector body, this should be clearly set out in the demand study and should be discounted towards the evidence of demand for further visitor accommodation.</p> <p>[HS8 Justification, para 3.114] 3.114 However, the delivery of visitor accommodation must be balanced against need for other forms of development, not least housing. Newham has seen high demand for hotels development in recent years, at a time when the borough is also providing the highest level of temporary accommodation in the country [add footnote reference to Trust for London, Housing and homelessness (2024), hyperlinked to https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Ftrustforlondon.org.uk%2Fdata%2Ftopics%2Fhousing%2F%3Ftab%3Dtemporary-accommodation-borough&data=05%7C02%7CAntonia.Marjano v%40newham.gov.uk%7C94d1625708a34563f80f08dd3c9e0cb6%7C353669e1971846f89bed95afc8776c8a%7C0%7C0%7C638733371698088410%7CUnknown%7CTWFFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwM</p>

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																					CiIsIIAiOiJXaW4zMlslkFOIjoiTWfPbCiIsIldUljoyfQ%3D%3D%7C0%7C%7C%7C&sdata=gl%2FGR2iJbqOAoc2%2BH73uGDiT3L0xSxyyB%2FCXUw%2BpabA%3D&reserved=0]. Given the housing crisis, homeless households are at times placed temporarily in hotels or bed and breakfast accommodation, which are not suitably designed to meet day to day living needs for longer periods of time and can lead to significant health and wellbeing problems when people are required to wait a long time for suitable permanent accommodation. The Council has therefore taken a proportionate approach as part of this policy, seeking to balance visitor accommodation demand with the high need for general needs housing in the borough, in line with the approach set out in policy H1.3 of this Local Plan. The London Plan (2021) estimates that London will need to build an additional 58,000 bedrooms of serviced accommodation by 2041, delivered primarily within the Central Activity Zones, but also increasingly in town centres more broadly. The study allocates a share of the need to Newham equating to 5.2 per cent or 3,031 net rooms. Latest monitoring indicates that 4,373 2,192 rooms have already been delivered, with a further 483 1,085 in the pipeline as of 2022/23. The policy therefore requires market demand testing that reflects Newham's economic growth and tourism demand , to ensure there is not an over delivery of visitor accommodation and land is protected for other priority uses.
Reg19-E-096	Redefine Hotels Portfolio IV Ltd	Savills	Reg19-E-096/035	High Street	HS8 Visitor accommodation														It is also noted that draft policy HS8 (Visitor Accommodation) sets out that “all visitor accommodation should meet the accessibility standards set by London Plan (2021) Policy E10”. This is supported as it is aligned with the GLA’s accessibility requirements for new hotel accommodation.		Support noted.

High Streets Comments to the full Regulation 19 Representations																				
Reg19 -E-178	Royal Docks		Reg19-E- 178/026	High Street	HS8 Visitor accommod ation							Blank	Blan k					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: It is suggested that for clarity, the distance from ExCeL should be by reference to a distance rather than a walking time (which is inherently subjective and unclear). Specific reference within site allocations as to which ones are considered appropriate to support ExCeL could be considered. In addition, given the continued evidence of high demand for hotels to support ExCeL’s operation, consideration should be given to increasing the distance from ExCeL to allow a greater range of options for hotel sites.</p>	<p>The comment you have provided has not resulted in a change. We did not consider this change to be necessary as the Local Plan provides a positive and effective framework for meeting demand for hotels in the borough, in a way which aligns with the NPPF and the London Plan on supporting the local visitor economy, while also balancing other needs, particularly for housing, as stated in the justification section of policy HS8. The implementation section provides the criteria of how a 15min walking zone will be identified, and the extent of the zone may change over time with enhancements to the pedestrian accessibility of the area.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p> <p>However this policy's approach to managing demand for hotels can be more clearly set out in the implementation, to better coordinate with policy H1 and clarify how demand for hotels will be balanced with the need for general housing. Further, the Council notes that Newham has seen high demand for hotels development in recent years, at a time when the borough is also providing the highest level of temporary accommodation in the country, a proportion of which is provided in hotel or bed and breakfast accommodation. The Council therefore made the following clarification modifications to the implementation and justification texts of HS8 which are included in the modifications table.</p> <p>[HS8.2 implementation] Where the demand justifies an edge of centre or out of centre locations as per the criteria above, a Sequential Test will also be required in line with the NPPF. [remove duplication of HS8.1 implementation and replace with] When reviewing evidence of market demand for new or intensified visitor accommodation, the council will take a balanced view with regards to the demonstrated demand at the location compared to the pipeline of visitor accommodation in the borough and any Newham-specific share of change in gross room demand set out as part of the London Plan evidence base. Where the Council deem that needs are already being met through the pipeline, granting permission for visitor accommodation proposals that do not meet the spatial strategy of this plan, including the prioritisation of sites for housing set out in H1.3, will rarely be justifiable.</p> <p>Where existing visitor accomodation capacity is taken up by people owed a homelessness duty, by Newham or any other public sector body, this should be clearly set out in the demand study and should be discounted towards the evidence of demand for further visitor accomodation.</p> <p>[HS8 Justification, para 3.114] 3.114 However, the delivery of visitor accommodation must be balanced against need for other forms of development, not least housing. Newham has seen high demand for hotels development in recent years, at a time when the borough is also</p>

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																					<p>providing the highest level of temporary accommodation in the country [add footnote reference to Trust for London, Housing and homelessness (2024), hyperlinked to https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Ftrustforlondon.org.uk%2Fdata%2Ftopics%2Fhousing%2F%3Ftab%3Dtemporary-accommodation-borough&data=05%7C02%7CAntonio.Marjanov%40newham.gov.uk%7C94d1625708a34563f80f08dd3c9e0cb6%7C353669e1971846f89bed95afc8776c8a%7C0%7C0%7C638733371698088410%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIslIAiOiJXaW4zMiIsIkFOljoITWFpbGlldUljoyfQ%3D%3D%7C0%7C%7C%7C&sdata=gl%2FGR2ilbqOAOc2%2BH73uGDit3L0xSXyyB%2FCXUw%2BpabA%3D&reserved=0]. Given the housing crisis, homeless households are at times placed temporarily in hotels or bed and breakfast accommodation, which are not suitably designed to meet day to day living needs for longer periods of time and can lead to significant health and wellbeing problems when people are required to wait a long time for suitable permanent accommodation. The Council has therefore taken a proportionate approach as part of this policy, seeking to balance visitor accommodation demand with the high need for general needs housing in the borough, in line with the approach set out in policy H1.3 of this Local Plan. The London Plan (2021) estimates that London will need to build an additional 58,000 bedrooms of serviced accommodation by 2041, delivered primarily within the Central Activity Zones, but also increasingly in town centres more broadly. The study allocates a share of the need to Newham equating to 5.2 per cent or 3,031 net rooms. Latest monitoring indicates that 4,373 2,192 rooms have already been delivered, with a further 483 1,085 in the pipeline as of 2022/23. The policy therefore requires market demand testing that reflects Newham's economic growth and tourism demand, to ensure there is not an over delivery of visitor accommodation and land is protected for other priority uses.</p>
Reg19-E-180	PEACH: The People's Empowerment Alliance for Custom House		Reg19-E-180/020	High Street	HS8 Visitor accommodation						Blank	Blank						Blank	Visitor accommodation In relation to policy HS8: We believe the scale of development of hotels/visitor accommodation should be proportionate to the character of the existing neighbourhood.		These comments do not relate to the tests of soundness and it is considered that this policy approach is sound. Policy HS8 already incorporates your proposed approach by requiring visitor accommodation to be scaled in way that is proportionate to the scale of the centre and/or the tourism or employment function of the area it services. The scale of development in terms of massing will also be assessed in line with the relevant Design chapter policies, including D3.

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Reg19-E-190	Manor Park Business Association		Reg19-E-190/002	High Street	HS8 Visitor accommodation														Our Association wish to highlight the need for more Boutique type of Hotels in Manor Park. We note that there are no such places of accommodation from Forest Gate, up until The A406 Flyover. We would not wish to see Bread and Breakfast type Hotels, but well run and professional looking Boutique types, that integrate into the local surroundings and local scene.		These comments do not relate to the tests of soundness and it is considered that this policy approach is sound. The Plan can facilitate the aspiration you have set out by supporting proposals for visitor accommodation in all of Newham's town and local centres, including Manor Park Local Centre, where they are of suitable quality and supported by evidence of local demand.
Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/042	High Street	HS8 Visitor accommodation														The HPA proposals for Silvertown include an allowance for a hotel on the site, which is consistent with the support for main town centre uses in the draft site allocation. The locational requirements should account for the appropriateness of hotels within proximity of City Airport as well as the ExCel centre. Visitor accommodation can provide an important function to the operation of City Airport.		A change to this policy approach has not been made. We did not consider this change to be necessary as, as a main town centre use, hotels are supported to come forward in local centres, where they demonstrate they meet local demand and are of a suitable scale and quality as per the overall policy criteria. There are 3 local centres designated in the Plan which can support visitor accommodation servicing London City Airport, including Silvertown Local Centre. The Council is satisfied that the plan is sound.
Reg19-E-233	RAD CHP Ltd	CBRE	Reg19-E-233/007	High Street	HS8 Visitor accommodation						Blank	No						Blank	Draft Policy HS8: Visitor Accommodation Draft Policy HS8 confirms that hotels and other forms of visitor accommodation will be supported on sites within 15 minutes walking distance to the ExCel conference centre (as well as town and local centres). The fact the emerging Local Plan recognises the role of the ExCel conference centre as a widely recognised conference centre is supported, and it is supported that the plan therefore states that applications for visitor accommodation within the specified isochrone catchment of the ExCel centre are supported in principle. However, there needs to be an element of flexibility to the application of the policy in relation to walking time to Excel so the policy is not applied in such a blunt way that 15 minutes walking distance to Excel would be acceptable but 16 minutes would require significantly more justification. This policy should be applied in a pragmatic manner.		Comment noted. The policy approach, as set out and explained in the implementation, provides for a proportionate degree of flexibility to potentially changing circumstances in the pedestrian accessibility of the area around the Excel Centre, and further site-specific material considerations can be considered at planning application stage.
Reg19-E-025	Daniel Zimarev		Reg19-E-025/003	High Street							Blank	Blank						Blank	[Excellent outreach to the inhabitants. Here are my thoughts on what will make the plan better.] <u>Negatives:</u> > Plan still focuses on residential and community uses. Plaistow Hub (an excellent project) already brings a big high-quality residential element, as well as incorporating library, gym, shop and community centre. What is currently completely absent in the town centre area is quality commercial and innovation / education space (arguably its future engine): things like BNP Paribas Bank / UBS East London branch, Imperial College / LSE East London Campus, a high-tech or scientific park from one of Oxbridge Colleges (e.g. see https://www.sjip.co.uk/).		A change to this designation has not been made. We did not consider this change to be necessary as the all aspirations you have noted for Plaistow North Local Centre could be delivered through the existing policies in the Plan, applied in the round. For example, policy HS2 supports diversification of uses in local centres, while policy SI4 supports delivery of quality education facilities. However, the planning system cannot direct who the occupiers would be.

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Reg19-E-065	Stratford Original BID		Reg19-E-065/012	High Street							Blank	Blank							Stratford Original is the business improvement district in Stratford. We have been working over the last 9 years on the following areas: Enhancing the environment (place-making), Promoting and Activating, Business Essentials (support business), Safety. Stratford Original BID has become a catalyst in Stratford with bridging partners and stakeholders and delivering additional value through projects to the town centre. We believe we should be identified as a key LBN partner/ consultee for any future development.		Comment noted.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/097	High Street															No comment.		Comment noted.
Reg19-E-091	IQL Office LP	Quod	Reg19-E-091/003	High Street							Blank	No						Blank	In general, we support the encouragement for a wide range of town centre uses to come forward in Stratford Metropolitan Centre		Support noted.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/034	High Street															5 High Streets 5.1 St William continues to support LBNs objective of ensuring its network of town centres can evolve and thrive and continue to meet the shopping, social, leisure and civic participation needs of Newham’s growing population.		Support noted.
Reg19-E-236	Friends of Queen's Market		Reg19-E-236/014	High Street							Blank	No						Blank	[The market’s affordability] 2) The Retail and Leisure Study, and Town Centre Network Review contain no analysis of Newham’s Markets, or Queen’s market and its economic role within retail, leisure and the Green Street town centre. The evidenced connection between Queen’s market and Green Street is not examined: shoppers come to the market and then visit Green Street and vice versa. It is not clear whether any of the shops surveyed in the Retail and Leisure Study are located inside the market. The Market appears to be invisible in these supporting documents.		The Retail and Leisure Study (20222) is a borough-wide study addressing a range of aspects related to the vitality and viability of Newham's Town Centres. The data of uses/units mix used comes from Experian, which is a trusted source typically used in such studies and captures all permanent premises within the centre's boundary. In the case of Green Street, the data will have captured the shops on the exterior edges of the market, but not the market stalls. Neither the data, nor the study focus specifically on markets. Nevertheless, the results of the telephone survey that has informed the study did identify that markets are a footfall driver for Newham's town centres (see para 5.22 and 5.38.iv for Stratford, 6.17.iv for East Ham, 7.18.iii-iv for Green Street, and 8.23.iv for Forest Gate). This has resulted in recommendation LBN18 that markets should be protected in policy, particularly noting the strong function of Queens Market. We consider that the study has provided a proportionate level of consideration to the role of Queens Market, and Newham's existing markets in general, and provides robust evidence for the Local Plan.