

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-C-003	Luisa Roberto		Reg19-C-003/001	General	N4.SA1 Canning Town East						Yes	Yes						Yes	N/A	N/A	Blank submission noted.
Reg19-C-010	Momodou Sanyang		Reg19-C-010/001	General							Yes	Yes						Yes	I feel the local plan is both legally compliant and embed in it the duty to co-operate.	No modification necessary on my view.	Comment noted.
Reg19-C-011	JOHANN HUMAN		Reg19-C-011/001	General							Yes	Yes						Yes	Legally compliant Legally compliant and sound		Comment noted.
Reg19-C-043	fazlurrahman mohammed		Reg19-C-043/001c	Social Infrastruc ture	SI1 Existing community facilities and Health facilities	N7.SA1 Abbey Mills					No	No						No	To make the Local Plan legally compliant and sound, the following modifications are necessary: Community Engagement and Collaboration: Our community is eager to collaborate with landowners and the relevant authorities to design and deliver a replacement facility that reflects the actual needs of its users. This collaboration is essential for ensuring the facility is functional, inclusive, and adaptable to future growth. The plan should specifically outline mechanisms for ongoing consultation with the community to ensure compliance with the duty to cooperate.		Comment noted. The Duty to Cooperate is the obligation to engage on strategic cross boundary matters with other Local Planning Authorities and prescribed bodies as part of the Town and Country Planning (Local Planning) (England) Regulations 2012. Please see our continued engagement of strategic cross boundary matters in our Duty to Cooperate Report and Statements of Common Ground with Duty to Cooperate partners.
Reg19-C-043	fazlurrahman mohammed		Reg19-C-043/003a	General							No	No						No	[The Local Plan is not legally compliant and is unsound for several critical reasons:] Duty to Cooperate: The draft plan does not sufficiently engage with local stakeholders, including our community. This failure to meaningfully collaborate demonstrates non-compliance with the duty to cooperate, which is a legal requirement.		Comment noted. The Duty to Cooperate is the obligation to engage on strategic matters with other Local Planning Authorities and prescribed bodies as part of the Localism Act 2011. The prescribed bodies are set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. The Duty to Cooperate does not require us to engage with local stakeholders, however this is still a requirement of the plan making process and part of our wider Council's commitment to ensuring residents can participate in our work. As such we have made wide ranging efforts to engage with local communities as part of the developing the Plan, as demonstrated in the Issues and Options, Regulation 18 and Regulation 19 Consultation Reports.
Reg19-C-051	Idris Patel		Reg19-C-051/001a	Social Infrastruc ture	SI3 Cultural facilities and spot and recreation facilities	N7.SA1 Abbey Mills					No	No						No	it is the duty of the council to engage with the land owner prior to any planning.		Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh

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Reg19-C-053	Alex Gray		Reg19-C-053/001	General							Yes	Yes						Yes	N/A	N/A	Blank submission noted.
Reg19-E-006	Maria Marino		Reg19-E-006/001	General							Blank	Blank						Blank	Many thanks for this. I was interesting the session . I went to East Ham library to get a hardy copy of the LP but I didn't found any I can take to my practice .		Comment noted. The Local Plans were not available to take away from Newham libraries. This ensured a copy remained available for those who couldn't access the Local Plan on our website. This complies with Regulation 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
Reg19-E-006	Maria Marino		Reg19-E-006/003	General							Blank	Blank						Blank	Please note that the consultancy in charge of this study stated that the boundaries has been changed by residents and this has to be supervised as many residents don't participe in consulation due they are not settle of homeowners living in HMO and don't care about the LP . For my own experince volunteering in the communities assembles one year always we have the same issue where the conversation is being dominated by few residents not all . It is a group of resident living in the conservation area who has the power as they participate en Community Assemblies they are mostly enghish , wealthy and homeowners living in Manor Park Conservation Area that now has pushed to. be part of Forest Gate depriving Manor Park of the only conservation area has with not sense . Other wards has not participation to decide or change boundaries as they are mostly vulnerable , poor , sick , disable , tenants and travellers in HMO many don't speak enghish so you can not rely only in the residents who participate as is has many other that don't have a voice for the reasons exposed above		Comment noted. We acknowledge the challenges you raise regarding who participates in consultations and we do our best to make our local plan consultations accessible for all and encourage participation from underrepresented groups. We identified language barriers as a potential barrier to inclusion for residents. So we ensured that our promotional materials advertising each stage of the consultation included information about how to access the consultation in the most commonly spoken languages in Newham. Additionally, the online consultation software supported translation software, making the plan accessible in various languages using a readaloud functionality. At the Regulation 19 stage of the consultation we also reached out to 63 community organisations, representing faith groups, people with disabilities, LGBTQ+ and other vulnerable groups. We request if we could attend one of their meetings to give an explanation of the Local Plan consultation, why some policies may be of interest to them, and explain the process for submitting a formal representation on the Local Plan consultation. Following this inquiry we attended meetings with the Inter-Faith Forum, One Newham, Stratford BID and the Homelessness Forum. This was alongside holding online and in-person sessions where residents could ask questions regarding the Local Plan and consultation process.
Reg19-E-006	Maria Marino		Reg19-E-006/005	General							Blank	Blank						Blank	Thank you so much for those clarifications and links that I will read with time . Yes I would like my comments be assessed please .		Comment noted.

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Reg19-E-006	Maria Marino		Reg19-E-006/009	Building a Fairer Newham							Blank	Blank						Blank	Here is an area where women are invisible and dominated by one culture or two as I said above . My area is not diverse as Newham says at all , the opposite of what I though when I moved here to settle investing all our savings , is very sad almost impossible to socialised and make friends as they lives in their own groups not sharing with other who don't belong to them :-(Comment noted. While I am sorry this is your experience, the latest Newham Residents Survey suggest that the majority of residents agree that people get on well together and feel a sense of belonging to Newham.
Reg19-E-006	Maria Marino		Reg19-E-006/010	Building a Fairer Newham							Blank	Blank						Blank	I wish my area became diverse where all can participate , buy their own food and with spaces to socialised or cowork , here is inexistant with high crime and deaths (Plashed Park)		The Local Plan addresses this topic through policy HS6, by limiting the concentration of hot food takeaways and gambling premises throughout the borough, and by promoting take up of healthy food standards. However it cannot deliver the change you have requested as the planning system cannot dictate operational models of existing businesses. The Council's Public Health department are aware of the issues of access to quality, nutritious food in the borough and improving this is one of the key priorities of the 50 Steps to a Healthier Newham strategy.
Reg19-E-007	David Gilles		Reg19-E-007/001	General							Blank	Blank						Blank	Provisional Comments on the LB Newham Regulation 19 Draft of the Local Plan (the R19D) and subject to change/updating during the consultation process starting on 19 July 2024 1 Some General comments not in any priority order on the Regulation 19 Draft This draft is an improvement on the R18 Draft. However it still contains imperfections.		Comment noted.

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

Reg19-E-007	David Gilles		Reg19-E-007/003	General							Blank	Blank					Blank	<p>2 Consultation Process on R19D</p> <p>The consultation process associated with the R19 draft can only be described as inadequate.</p> <p>There are two separate issues here which overlap:</p> <p>The first is the ability of residents to engage meaningfully and in understandable non planning terms with what the Plan does and what the Borough should look like.</p> <p>The second is the ability of Councillors to have political oversight and ownership of the Plan, including influencing and deciding what goes in it, while being mindful of their statutory duties. Briefings are not adequate in this respect.</p> <p>A different language is needed for each type of consultation so that the same options and choices are made apparent to both constituencies.</p> <p>In Newham, however, Consultation at all stages has been about detail and not substance. Witness the difficulty in discussing and the process of making Council policy over the 50% SH issue and the unhelpful role played by officers in this matter.</p> <p>Council members, in particular, have not been properly involved despite their having the constitutional responsibility to adopt the Plan and despite a number of them attempting on several occasions to establish a proper review process for a revised Local Plan The most egregious lack of consultation by the Plan’s preparers, however, has been with the Chairs of the Council’s Strategic and Local Development Committees.</p> <p>This is in part a failure of political leadership . However, it also reflects Mayoral and officer reluctance to embrace and work with the broad support of Councillors for a different approach, particularly to housing.</p> <p>The R19D is 608 pages long and extremely difficult to navigate on a screen. The consultation schedule in Appendix 7 while welcome in itself as a description of responses to some of the individual representations is helpful and necessary but not sufficient. In particular and despite a request to the Mayor no effort has been made to annotate, map and publish the textual deletions from the Regulation 18 Draft of the Plan (the R18D) in response to consultation and the additions to the R19D.</p> <p>For any outsider to the Plan process it is very time consuming to find the changes that have been made to the R19D as it involves textual comparison with the R18D side by side on a screen where page numbers have changed. It is also then sometimes difficult to understand and then assimilate these changes. Serious thought needs to be given at to how this process can be improved. A Track changed R19D should be the first step.</p> <p>An imperfect and partial attempt to do this has been attempted and the results are now set out below.</p>		<p>Comment noted. Thank you for this feedback.</p> <p>The Local Plan has been drafted to be clear and concise and uses as plain English as far as possible so that it can be used and understood by a range of users. However, it is also a statutory planning document, so the document and policies are required to use planning language. We did provide Main Changes Summary documents for each theme to outline the main changes from the previous Draft Local Plan which we hoped would be more accessible.</p> <p>A range of consultation events were held, including online and in person events, where residents were able to ask specific questions to planners to gain a better understanding of the draft policies and the specific Regulation 19 consultation process.</p>
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Reg19-E-007	David Gilles		Reg19-E-007/005	General							Blank	Blank						Blank	<p>4 Equalities Impact Assessment</p> <p>The Equalities Impact Assessment appended to the R19D is a significant change from the EQIA in the Regulation 18 Draft. It is clear that criticism of the previous tick box approach has had an impact.</p> <p>The latest EIA has been drafted by same consultants who wrote the earlier very poor assessment. Whilst the latest assessment is some improvement, the higher standard of the EIA that was in the Local Plan of 2018 has not been met and further improvements are required. More will be said on this matter in due course.</p>		<p>Comment noted. The Local Plan is a strategy to manage development in the borough, and as such touches on many aspects of people's day to day lives through their interaction with the built environment. By its nature, the Local Plan is a high level document which is broad in scope – addressing the application of standards, guidance and targets to deliver a range of physical infrastructure, social infrastructure, housing, employment, green space and other outcomes.</p> <p>In addition, the Local Plan is limited in what it can influence. It cannot address in detail the operation of buildings and spaces that it helps deliver and it cannot require changes to happen outside of planning processes or without the involvement of the landowner.</p> <p>These two factors mean that while a full EqIA is required for the Local Plan, this is necessarily high level both in the data it can use for the assessment and the potential outcomes it can identify. Planning Policy Officers have worked with the Council's Inclusion Officers to adapt the corporate EQIA process in a meaningful and appropriate way for the Local Plan. A range of data sources have been used that include data on the specific needs and challenges of specific sections of the population, including from Newham's Population Surveys and the Census 2021. We believe our approach and the outcomes of the EQIA assessment are proportionate and effective for plan-making purposes.</p> <p>In addition, in recognition of the policy flexibilities which are retained by applicants, the submission Local Plan includes policies in the Building a Fairer Newham chapter that require developers of larger sites to undertake further engagement (BFN2) and an assessment of Social Value and Health Impacts (BFN3) which will support applicants to consider how their scheme impacts Newham residents. These processes will be monitored through the Local Plan monitoring framework and provide learning towards the next Local Plan review and its EqIA. The Council is satisfied that this approach is proportionate and appropriate for the local plan process and meets the Council's duties under the Equalities Act.</p>

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																			Councillors to recharging this cost to developers			
Reg19-E-007	David Gilles		Reg19-E-007/041	General							Blank	Blank							Blank	Dear Ms Custance and Ms Kuper-Thomas Please would you take this letter and attachments as my final submission to the consultation on the current Regulation 19 Draft of LB Newham’s Local Plan (the R19D). I asked Ellie Kuyper Thomas on 09 August 2024 to treat my preliminary note on the R19D as a formal submission to the consultation process. See note and email attached at Appendices 1 and 2 respectively. I also attach my email of 30 August 2024 to you. See Appendix 3. This primarily sets out my thoughts and concerns on the issue of the EIA for the R19D. I also attach my further email of 08 September 2024 to you and your reply of 18 September. See Appendices 4 and 5. These emails raise various questions about the R19D and in particular why various matters raised in the Council resolution on the Regulation 18 Draft of the Local Plan have not been included in the R19D.		Comment noted.
Reg19-E-007	David Gilles		Reg19-E-007/042	General							Blank	Blank							Blank	An additional question here is why the “Newham Local Plan Refresh Regulation 18 Consultation Report” (the Consultation Report) downgrades the decisions of the Council to representations made by Councillors and then ignores these decisions; see eg the Consultation Report pp 79/80 which refers not to the Council decision but rather to “Councillors felt that the borough should deliver 50 percent of all new housing as social rent homes”. This is a serious misrepresentation which should be remedied in a final draft of the Plan.		Comment noted. The consultation report provides a summary of the consultation responses received during the Regulation 18 consultation. The summary you reference is in relation to consultation comments received by councillors during the consultation period. The Full Council motion you reference was not a consultation response and was therefore not included in the consultation report. The motion was duly and appropriately referenced in the Cabinet decision report and in the Housing Main Changes Summary factsheet made available to the public at the Regulation 19 consultation, which explained the range of factors which fed into changes made to the Plan.

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See Note 1 below [\[see pg 3 of file named As Sent DG Submission on R19 Draft Local Plan 180924\]](#) extracted from the record of the online consultation meeting.

6 Proposed changes to the R19D to take account of the Government’s proposed changes to the NPPF and their impact on the 50% Social Housing policy;

7 Community facilities and the sequential test. Again your comments in response to the questions raised at the on line consultation meeting are most helpful and this much clearer statement of the now proposed position should be included in the R19D as a first step. See Note 2 below [\[see pg 4 of file named As Sent DG Submission on R19 Draft Local Plan 180924\]](#) extracted from the record of the online consultation meeting. However, further consultation on the sequential test in relation to all applications and the inter relationship between community facilities and residential accommodation should also take place with the communities concerned. In equalities terms the “old” communities of Newham already have their community facilities where they need them, often in residential areas. We must be aware not to create a situation where our “new” communities are disadvantaged in this respect and have the discussion about that necessary balance in residential areas, which is what this discussion comes down to in the end;

8 Neighbourhoods and gentrification where again the revised text is a definite step forward but where more could and should also be said about the Council’s role in protecting and enhancing social infrastructure for existing communities;

9 A discussion on various public health and the provision of adequate health infrastructure matters where I understand that Cllr Susan Masters will be submitting a separate representation to you;

10 The discussion on units v habitable rooms and why units should be the measurement used in the Local Plan;

11 A discussion on the role of studio units, if any, in the provision of accommodation that will be built for a lifespan of over 60 years, where changes have been made in response to Developer proposals only;

12 Housing Mix in the context of not only the SHNA but also bedsize requirements of households where the Council has accepted a Duty and households on the waiting and transfer lists; ie these considerations may dictate a different mix to that derived from the SHNA alone and the Housing Service should be involved in this discussion;

13 Proposals for the monitoring and reporting process so that Local Plan targets (and Manifesto Commitments) can be regularly measured in terms of both outputs and outcomes in an accessible and easy to understand format and reported upon to Councillors and the community. To say that “the Council produces an annual monitoring report.....” is not adequate in this respect as the whole purpose of monitoring regularly is to provide a sound basis for management action;

14 Any other outstanding matters from my preliminary submission.

LB Newham Response		
Proposed modifications and explanation		Given the election of the new Government and the time over which it is intended that the new Plan has validity together with the extension of the final submission date it seems important that we now take some further time to get the Newham Plan right. I hope that the comments set out above are a starting contribution to such a process.
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		
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Reg19-E-007	David Gilles		Reg19-E-007/045	General							Blank	Blank						Blank	<p>[Appendix 2 - email dated 9th August 2024]</p> <p>Dear Ellie</p> <p>Thank you for this.</p> <p>Given your comments please treat my submission as a formal representation which will be updated in due course</p> <p>As you cannot provide a TT version of R19 Draft please can you provide the version control document for the R19 Draft which you must have to have kept a proper record of changes?</p>		Comment noted. You were provided with the set of version control documents showing the changes made from the regulation 18 Local Plan to the regulation 19 Local Plan.
Reg19-E-007	David Gilles		Reg19-E-007/046	General							Blank	Blank						Blank	<p>[Appendix 2 - email dated 9th August 2024]</p> <p>I note that you have not answered my questions set out in Italics below <i>“My question is how you intend to take this proposed change to the NPPF into the Plan. It certainly provide a fundamental underpinning of 50% SH hitherto absent in Planning Policy. Would not the Council’s best course of action, on balance, be to improve the SH justification in the light of the above through a further period of consultation which would also allow some of the remaining issues to be addressed? I think that this is the approach that I would be most happy with and argue for in a wider discussion.”</i></p> <p>Would it be possible to do so?</p>		Comment noted. Consideration of this option has been included in the Full Council report seeking agreement to submit the Plan.

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																					planning application the Council has regard to its equalities obligations including its obligations under section 149 of the Equality Act 2010 (as amended). For the purposes of this application there are no adverse equalities issues. This reflects the assessment of an application as a whole.
Reg19-E-007	David Gilles		Reg19-E-007/048	General							Blank	Blank						Blank	<p>[Appendix 2 - email dated 9th August 2024]</p> <p>Finally something that I have forgotten to mention. I think that the Responses to Consultation Document still refers to 15 Minute Neighbourhoods and this needs to be updated. It could be another document but after wading through the IIA document (which has a lot of useful stuff in it some of which could go into the justifications) one rather loses the will to live!</p> <p>I hope to see you tomorrow</p>		Comment noted. The approach to 15 minute neighbourhood terminology is provided on page 138 of the Regulation 18 consultation report. The Regulation 18 consultation report reflects and responds to comments made on a previous version of the Plan and as such uses the same terminology. Where residents have raised concerns regarding 15 minute neighbourhoods, the response explains the wording change made in the regulation 19 Local Plan. For an example, see comment reference Reg18-T008/004 on page 15 of the introduction appendix.

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Reg19-E-007	David Gilles		Reg19-E-007/049	General							Blank	Blank					Blank	<p>[Appendix 3 - email dated 30th August 2024]</p> <p>Dear Jane</p> <p>Thank you for this reply</p> <p>Dear Jane</p> <p>I don't think that I can disagree with anything that you have said below other than your very last para because the rest of your comments are a statement of fact.</p> <p>The problem that I have is a different one</p> <p>You and your staff have produced a document that with appendices is several thousand pages long. Equalities matters are not dealt with in the Plan itself but in a number of its appendices and even here are spread over 2 documents. I doubt very much that anyone has assimilated all this material and the level of interest at the drop in meeting in Stratford supports this view. I have commented elsewhere on this and its consequences.</p> <p>.</p> <p>As you will be aware from comments I have already made I have read the Housing material in detail in both the R18 and R19 drafts and produced several notes on them because that is my political and professional areas of both interest and expertise and some of the other areas I have skim read such as Community Facilities and the sequential test and the environmental material as well as the specific development proposals</p> <p>EIA considerations are not particularly evident other than at the level that provision of more SH in Newham is driven by the massive inequality in the Housing Market that exists in the Borough where someone like myself who has been a borough resident since 1968 is well housed on the Woodgrange Estate while virtually no one from the younger generations behind me can afford a decent home (of whatever tenure) unless the bank of mum and dad is behind them.</p> <p>So how does the Plan address the structural inequalities here and the answer is that it does not. And I think that your last sentence contributes to this issue because when you say that "this isn't a tick box exercise" I think that this is precisely what it is because there are no tools given to the assessors of Planning Applications to address these issues.</p> <p>So how does one move on from this without throwing all the pieces up in the air and starting again</p> <p>I think that you might usefully go back to the EIA Checklist set out in the 2018 Plan. This might, suitably amended, be the basis for a set of Newham specific criteria for the assessment of PAs which could take account of the structural issues in the Housing Market AND be in line with the proposed changes to the NPPF which have to be about levelling up the powers</p>	<p>Comment noted. The Local Plan is a strategy to manage development in the borough, and as such touches on many aspects of people's day to day lives through their interaction with the built environment. By its nature, the Local Plan is a high level document which is broad in scope – addressing the application of standards, guidance and targets to deliver a range of physical infrastructure, social infrastructure, housing, employment, green space and other outcomes.</p> <p>In addition, the Local Plan is limited in what it can influence. It cannot address in detail the operation of buildings and spaces that it helps deliver and it cannot require changes to happen outside of planning processes or without the involvement of the landowner.</p> <p>These two factors mean that while a full EqIA is required for the Local Plan, this is necessarily high level both in the data it can use for the assessment and the potential outcomes it can identify. Planning Policy Officers have worked with the Council's Inclusion Officers to adapt the corporate EQIA process in a meaningful and appropriate way for the Local Plan. A range of data sources have been used that include data on the specific needs and challenges of specific sections of the population, including from Newham's Population Surveys and the Census 2021. We believe our approach and the outcomes of the EQIA assessment are proportionate and effective for plan-making purposes.</p> <p>We have not used the 2018 checklist and have instead used the Council's more up to date corporate EQIA approach which has been updated to reflect latest data and best practice.</p> <p>In addition, in recognition of the policy flexibilities which are retained by applicants, the submission Local Plan includes policies in the Building a Fairer Newham chapter that require developers of larger sites to undertake further engagement (BFN2) and an assessment of Social Value and Health Impacts (BFN3) which will support applicants to consider how their scheme impacts Newham residents. These processes will be monitored through the Local Plan monitoring framework and provide learning towards the next Local Plan review and its EqIA. The Council is satisfied that this approach is proportionate and appropriate for the local plan process and meets the Council's duties under the Equalities Act.</p> <p>Finally, equalities considerations are also part of the development management process. There is case law that makes it clear that Local Planning Authorities should ensure that they clearly outline any issues that could impact on groups protected under equality legislation when determining planning applications in order to discharge the duty under the Equality Act 2010. Where groups or persons with protected characteristics are affected by development proposals any implications are highlighted in the planning officer's assessment. Larger applications are also accompanied by an</p>
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																			<p>of the Planning Authority to say no to developers whose proposals do not meet our needs (and yes I am aware that the proposals are also designed to make development easier and that this is a tension that will not necessarily be easy to work through!)</p> <p>So, I think that I would go for</p> <p>1 Bringing a summary of the EIA into the Plan proper and 2 Associate this with a specific methodology/criteria that 3 Start to address Newham’s specific requirements</p> <p>The trick will be to achieve this without adding a further level of complexity and delay to the planning process</p> <p>I am talking to other colleagues who are better informed in this area than myself about what this might involve.</p> <p>I said this in an email to Ellie on Wednesday “Just fyi at present I have suggested to the Mayor and John W that we go through a further phase of consultation on the R19D, now that the deadlines have been extended and I am also discussing this with some other members. The main issues are as set out in my earlier email.”</p> <p>Finally, I refer again to the Stratford consultation meeting—see above. There were no officers present who were able to engage on the issues I am interested in at the level of this email and it was therefore not productive. The Authority needs to find a better way of consulting on these Strategic Issues as the public face of the consultation process has been entirely about detail and not substance.</p>		<p>Environmental Statement that will include a chapter on socio-economic implications of a proposal including implications for those with protected characteristics. All applications carry the following informative: Equalities In determining this planning application the Council has regard to its equalities obligations including its obligations under section 149 of the Equality Act 2010 (as amended). For the purposes of this application there are no adverse equalities issues. This reflects the assessment of an application as a whole.</p>

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Representation Reference																		
Please can you tell me why officer have not accepted 4 specific points that were contained in the resolution on the R18 Draft agreed by Council. These are: <ul style="list-style-type: none">• The ex-Sphere site which might also be suitable for a large place of Worship• Pudding Mill• Stratford Waterfront/Eastbank• Proper in house viability assessment to challenge developers and inform members when making decisions. See eg the GLA material that I have already submitted																		

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Reg19-E-007	David Gilles		Reg19-E-007/051	General							Blank	Blank						Blank	<p>[Appendix 4 - email dated 8th September 2024]</p> <p>I have already commented again on these issues and sent you the GLA material on viability which sets out the issues very well. I am told that viability expertise is never present to be challenged in either SDC or LDC despite the key point in the GLA discussion that:</p> <p><i>“It is important to remember that it is up to the decision maker to decide the weight given to a viability assessment and, if they are able to see the outcome in a range of different scenarios, it is easier for them to do this”</i></p> <p>As an outside observer it appears to me that the Planning Service is taking the consultant viability study as an objective outcome that is therefore not challengeable; whereas in fact it is a subjective conclusion made by an external consultant dependent on developers for most of their business and therefore also highly constrained by the developer mindset on profitability and viability.</p> <p>It will be even more important going forward with the proposed changes to the NPPF, that such sleight of hand is demystified for elected members and that they are empowered to challenge what now appears objective and immutable. A recycled Planning Officer will not have the skills to help members provide challenge in this way. And the consequence of this is the wall of poor development in Silvertown Way or Barrats in Canning Town where members bemoaned the low percentage of SH in a scheme but had none of the intellectual or practical skills for dealing with this set of issues. Similar points can no doubt be made about other developments and especially higher rise ones.</p> <p>[...]</p> <p>On the question of monitoring is there a suite of PIs now in place to measure housing outputs and outcomes as set out in the first para of the extract quoted above? If so, please can I see it.</p> <p>[Response by Jane Custance was attached as Appendix 5]</p>		<p>Comment noted. It is a requirement for a sound local plan to be supported by a whole plan viability assessment which meets the requirements set out in the NPPF (including the most recent iteration) and Planning Policy Guidance. The whole plan viability assessment is one input into the development of the Local Plan, alongside assessments of objectively assessed need and delivery of wider objectives.</p> <p>The Submission Local Plan includes a monitoring appendix.</p>

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Reg19-E-007	David Gilles		Reg19-E-007/054	General							Blank	Blank						Blank	[Appendix 4 - email dated 8th September 2024] The deadline for comment has been extended by 2 weeks so it would be enormously helpful if I could have a reply by next weekend. I would finally point out that much of what I raise here and previously was matter that I wanted to discuss at the Stratford drop in meeting. Because only your more junior staff were present it was not possible to do this [Response by Jane Custance was attached as Appendix 5].		Comment noted. Your email was responded to.
Reg19-E-008	Hagley Ltd	Collective Planning	Reg19-E-008/001	General							No	No						Blank	REPRESENTATIONS TO LB NEWHAM DRAFT LOCAL PLAN (REGULATION 19) I write on behalf of my client, Hagley Ltd, to make representations to LB Newham’s Draft Local Plan (Regulation 19), which is currently out for consultation. Our client is the freeholder owner of land adjacent to 1 Knights Road, a major site in Lyle Park West and over the past 3 years has been in the process of bringing forward a mixed use development scheme for the site. My client’s site is edged in red below. [Figure 1 Site Plan]		Comment noted.
Reg19-E-008	Hagley Ltd	Collective Planning	Reg19-E-008/005	General							No	No						Blank	Conclusion I trust these representations can be considered to ensure the Local Plan is sound and justified. Please keep me informed of progress and details of the Local Plan and examination process.		Comment noted.
Reg19-E-010	London Borough of Redbridge		Reg19-E-010/001	General															Redbridge Council is pleased for Newham's comprehensive and ambitious Draft Submission Newham Local Plan.		Comment noted.
Reg19-E-010	London Borough of Redbridge		Reg19-E-010/002	General															We note that our previous comments on the Draft (Regulation 18) Newham Local Plan have been considered and addressed, especially in relation to waste and burial policies		Comment noted.
Reg19-E-010	London Borough of Redbridge		Reg19-E-010/003	General							Yes	Yes						Yes	Redbridge Council is supportive of Newham's Draft Submission Local Plan and considers the Plan to be positively prepared, fulfilling Duty to Cooperate requirements, good evidence base and is effective.		Comment noted.
Reg19-E-010	London Borough of Redbridge		Reg19-E-010/007	General														Yes	We consider that Newham is fulfilling Duty to Cooperate requirements and is communicating with neighbouring authorities, especially regarding the East London Joint Waste Plan.		Comment noted.

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Reg19-E-010	London Borough of Redbridge		Reg19-E-010/008	General															We continue to look forward to meeting with Newham officers for further discussions regarding joint strategic matters and cross-boundary issues.		Comment noted.
Reg19-E-010	London Borough of Redbridge		Reg19-E-010/009	General														Yes	Redbridge Council is supportive of the policy changes to the Draft Submission Newham Local Plan and considers Duty to Cooperate requirements to have been met.		Comment noted.
Reg19-E-011	Southern Housing		Reg19-E-011/001	General															On behalf of Southern Housing, I'm pleased to submit a representation to the above consultation.		Comment noted.
Reg19-E-011	Southern Housing		Reg19-E-011/006	General															We note that the Government is currently consulting on amendments to the National Planning Policy Framework (NPPF). Whilst the draft plan has reached Regulation 19 stage, if the Council decide not to proceed to submission, the new NPPF requirements are likely to be relevant.		Comment noted.
Reg19-E-011	Southern Housing		Reg19-E-011/007	General															We are most grateful for the opportunity to participate in this consultation. If you have any queries or require any further information, then please do not hesitate to contact me.		Comment noted.
Reg19-E-013	Transport for London		Reg19-E-013/001	General															Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a 'without prejudice' basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments do not necessarily represent the views of the Greater London Authority (GLA). A separate response has been prepared by Places for London to reflect TfL's interests as a landowner and potential developer. Thank you for giving TfL the opportunity to comment on the Regulation 19 version of the Newham local plan.		Comment noted.

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Reg19-E-013	Transport for London		Reg19-E-013/002	General															The London Plan was published in March 2021. Local plan policies and site allocations should be developed in line with relevant London Plan policy and TfL’s aims as set out in the Mayor’s Transport Strategy. In particular, it is important that local plans support the Healthy Streets Approach, Vision Zero and the overarching aim of enabling more people to travel by walking, cycling and public transport rather than by car. This is crucial to achieving sustainable growth, as in years to come more people and goods will need to travel on a relatively fixed road network.		Comment noted.
Reg19-E-013	Transport for London		Reg19-E-013/003	General															We welcome the positive changes made to the Local Plan in response to our comments at the Regulation 18 stage of consultation.		Comment noted.
Reg19-E-013	Transport for London		Reg19-E-013/007a	General								No							However, there are a few outstanding issues that we believe need to be addressed to ensure soundness and consistency with the London Plan...		Comment noted.
Reg19-E-013	Transport for London		Reg19-E-013/009	General															We have updated the detailed comments we made at the Regulation 18 consultation reflecting changes made to the Regulation 19 version of the Local Plan. These are included in the final column of the table in appendix A, below. Appendix B [Appendix B – Plans of TfL Infrastructure (forms part of TfL Reg. 19 response to Newham Local Plan)] in a separate attachment contains plans showing TfL infrastructure.		Comment noted.
Reg19-E-014	CPRE		Reg19-E-014/001	General															CPRE London is a membership-based charity with 2,500 members across London, concerned with the preservation and enhancement of London’s vital green spaces, as well as the improvement of London’s environment for the health and wellbeing of all Londoners.		Comment noted.

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Reg19-E-015	Greater London Authority		Reg19-E-015/001	General															<p>Planning and Compulsory Purchase Act 2004 (as amended); Greater London Authority Acts 1999 and 2007; Town and Country Planning (Local Development) (England) Regulations 2012 Re: Third consultation – Draft Submission Local Plan (Regulation 19)</p> <p>Thank you for consulting the Mayor of London on the London Borough of Newham’s (LBN’s) proposed Draft Submission Local Plan (Regulation 19). As you are aware, all Development Plan Documents in London must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor has afforded me delegated authority to make detailed comments which are set out below. Transport for London (TfL) have also provided comments, which I endorse, and which are attached at Annex 1.</p> <p>The Mayor provided comments on the earlier Newham Local Plan 2023-2038 (Regulation 18)consultation on 20 February 2023 (Ref: LDF25/LDD14/LP02/MJ01). This letter follows onfrom that earlier advice and sets out where you should make further amendments so that the draft Plan is more closely aligned with the London Plan 2021 (LP2021). These comments should be read alongside the Mayor’s previous response. The LP2021 was formally published on the 2 March 2021, and forms part of LBN’s Development Plan and contains the most up-to-date policies.</p>		Comment noted.
Reg19-E-015	Greater London Authority		Reg19-E-015/003	General															<p>The Mayor recognises that town planning functions for the London Legacy Development Corporation (LLDC) will be handed back to respective boroughs this year including to Newham. The draft Plan takes this into consideration by strategically planning for that part of the borough.</p>		Comment noted.
Reg19-E-015	Greater London Authority		Reg19-E-015/043	General															<p>Next steps I hope these comments positively inform the ongoing preparation of LBN’s Local Plan. We continue to be keen to work with you to address the issues identified in this letter and to ensure it aligns more closely with the LP2021 as well as delivering the Council’s objectives. If you have any specific questions regarding the comments in this letter, please do not hesitate to contact [redacted]</p>		Comment noted.

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Reg19-E-017	Bonny Downs Community Association		Reg19-E-017/029	General															All of these comments are my personal views - not necessarily the organisations I represent. They include, as follows: Chair, Bonny Downs Community Association Chair, Newham Cricket Club Chair, Eko Pathways School governing body Joint-Minister, Bonny Downs Church Volunteer, NEWway projectIt's a privilege to work together with LBN to make our wonderful borough even better.		Comment noted.
Reg19-E-019	Delia Taasin		Reg19-E-019/001	General															Street homelessness, high levels of unemployment, overcrowding, and influx of people into the borough are major challenges faced by Newham in recent years. Increased levels of crimes are going unreported in areas like, house breakings, pick pocketing and car thefts – reflecting the community accepting Police response is unlikely to produce a result. Rubbish dumping is increasingly common despite best efforts by the council. It is to be acknowledged; these are practical demonstrations of rising levels of poverty. The council's purse is strung due to pressure on its budgets to address local needs. This local area planning needs to be addressed against this backdrop. How can the money we have made to go the furthest is a question we need to address in this strategy.		Comment noted. The intention of the Local Plan is to ensure that development in the borough delivers the type of development which meets Newham's needs, including for social housing, as well as wider streetscape improvements that can benefit the wider public, alongside planning contributions which are used to improve and deliver new infrastructure - all of which contributes towards the Council's finances.
Reg19-E-020	National Highways		Reg19-E-020/001	General							Blank	Blank						Blank	Dear Planning Policy Team Thank you for your email of 20 July 2024 consulting us on the Newham Local Plan Regulation 19 consultation. The Strategic Road Network (SRN) is a critical national asset and as such National Highways works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.		Comment noted.
Reg19-E-021	Watkin Jones		Reg19-E-021/027	General							Blank	Blank						Blank	Conclusion WJG welcomes the opportunity to comment on the draft Local Plan. We trust that our representations on these aspects of the draft Plan are of assistance to the Council and will be taken into account to inform the next version of the Plan. In the meantime, please do not hesitate to contact on contact details redacted should you have any queries.		Comment noted.

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Reg19-E-022	Forward Group Trustees	Stantec	Reg19-E-022/001	General							Blank	Blank						Blank	We write on behalf of the Forward Group Trustees ("FGT") and to submit representations on the contents of London Borough of Newham’s (LBN) Draft Submission Local Plan (Regulation 19) June 2024 which comprise: <ul style="list-style-type: none">• Local Plan – Part 1 (Introduction, Vision and Objectives and policies);• Local Plan – Part 2 (Neighbourhoods and Appendices); and• Evidence base documents		Comment noted.
Reg19-E-022	Forward Group Trustees	Stantec	Reg19-E-022/010	General							Blank	Blank						Blank	These representations set out objections to the Draft Local Plan. By not objecting to other parts of the Draft Local Plan and its evidence base does not mean that the FGT support or endorse these other parts.		Comment noted.
Reg19-E-022	Forward Group Trustees	Stantec	Reg19-E-022/011	General							Blank	Blank						Blank	The FGT would welcome the opportunity to discuss the above before LBN publishes and submits its Draft Local Plan to the Secretary of State (SOS) for examination in public. Should you have any queries in relation to the above, please do not hesitate to contact the writer.		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-023	Anjuman-e-Islahul-Muslimeen of (London) UK	Newsteer	Reg19-E-023/001	General	N7 Three Mills	N7.SA1 Abbey Mills													<p>These representations are submitted on behalf of our client, Anjuman-e-Islahul-Muslimeen of (London) UK ('the Client'), with regards to the site identified as 'N7.SA1', to the London Borough of Newham ('the Council') in relation to their consultation on the Draft Submission Local Plan (Regulation 19), which is currently taking place.</p> <p>As set out at paragraph 35 of the NPPF (2023), and as guided within the Council's 'Regulation 19 Consultation Guidance' document, The Regulation 19 consultation requires comments to focus on the 'legal compliance' and 'soundness' of the Local Plan and whether the Council has complied with Duty to Cooperate. These representations will therefore follow the four tests of soundness, as follows: -</p> <p>a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs¹; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;</p> <p>b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</p> <p>c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and</p> <p>d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant</p> <p>¹ Where this relates to housing, such needs should be assessed using a clear and justified method, as set out in paragraph 61 of the NPPF</p>		Comment noted.
Reg19-E-023	Anjuman-e-Islahul-Muslimeen of (London) UK	Newsteer	Reg19-E-023/002	General	N7 Three Mills	N7.SA1 Abbey Mills													<p>Planning History Context The Site has an extensive planning history relating to its redevelopment, in the main, to provide a large mosque (application reference 12/00358/LTGOUT, which was refused and later called in by the Secretary of State who, on the 28 October 2015 agreed with the Planning Inspector to dismiss the subsequent appeal).</p>		Comment noted.

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Reg19-E-024	Home Builders Federation		Reg19-E-024/001	General															<p>Thank you for consulting on the Newham Local Plan, Regulation 19 consultation version. The following response is provided by [Redacted], on behalf of the Home Builders Federation (HBF).</p> <p>The Home Builders Federation (HBF) is the representative body of the home building industry in England and Wales. The HBF’s member firms account for some 80% of all new homes built in England and Wales in any one year, and include companies of all sizes, ranging from multi-national, household names through regionally based businesses to small local companies. Private sector housebuilders are also significant providers of affordable homes, building 50% of all affordable homes built in the last five years, including all homes for social rent.</p> <p>[Redacted] contact details are:</p> <p>[Redacted]</p> <p>The HBF would like to register its wish to participate in the examination of the local plan.</p>		Comment noted.
Reg19-E-026	London Borough of Barking and Dagenham	BeFirst	Reg19-E-026/001	General															<p>Thank you for the opportunity to respond to LB Newham’s Regulation 19 Local Plan consultation. We have reviewed the Regulation 19 draft (Parts 1 and 2), focusing on strategic, cross-borough policy areas. Please see the comments below on behalf of Barking and Dagenham Council.</p>		Comment noted.
Reg19-E-026	London Borough of Barking and Dagenham	BeFirst	Reg19-E-026/012	General															<p>We would be happy to discuss any of the above matters further and to work with you on a Statement of Common Ground for the Newham Local Plan.</p>		Comment noted.

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Reg19-E-027	B&Q Limited	RPS	Reg19-E-027/002	General							Blank	No							<div>Background</div> <div>B&Q Limited is part of Kingfisher plc. an international home improvement company with over 2,000 stores operating across eight countries within Europe and the United Kingdom. B&Q occupies a store in Newham situated on the Gateway Retail Park in Claps Gate Lane Beckton and has been present on the site since 1996.</div> <div>The store serves the whole of Newham including neighbouring areas of east and south-east London. It is a ‘bulky goods’ outlet selling building and garden products, fitted kitchens and bathrooms and furniture and furnishings. The product range is complementary to the type of products sold in town centres, requiring large floor areas for shopfloor storage and display and adjacent car parking for the transport of materials away, often by van.</div> <div>It makes a valuable contribution to the local economy both in terms of employment and the service it provides to local residents and businesses. The store directly employs 153 staff (63 full-time and 90 part-time), is an established part of the local retail market is also a supplier to local tradespersons and businesses.</div> <div>The store also plays an active role in the local community, both economically and socially. It actively supports the corporate charity, Shelter, and raises money for the B&Q Foundation. There is also more localised support through Neighbourly, such as the donation of building materials to local charities.</div>		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-027	B&Q Limited	RPS	Reg19-E-027/006	General							Blank	No							<p>Background [duplicated as part of the representation].</p> <p>B&Q Limited is part of Kingfisher plc. an international home improvement company with over 2,000 stores operating across eight countries within Europe and the United Kingdom. B&Q occupies a store in Newham situated on the Gateway Retail Park (part of the Beckton Triangel) in Claps Gate Lane Beckton and has been present on the site since 1996.</p> <p>The store serves the whole of Newham including neighbouring areas of east and south-east London. It is a 'bulky goods' outlet selling building and garden products, fitted kitchens and bathrooms and furniture and furnishings. The product range is complementary to the type of products sold in town centres, requiring large floor areas for shopfloor storage and display and adjacent car parking for the transport of materials away, often by van.</p> <p>It makes a valuable contribution to the local economy both in terms of employment and the service it provides to local residents and businesses. The store directly employs 153 staff (63 full-time and 90 part-time), is an established part of the local retail market is also a supplier to local tradespersons and businesses.</p> <p>The store also plays an active role in the local community, both economically and socially. It actively supports the corporate charity, Shelter, and raises money for the B&Q Foundation. There is also more localised support through Neighbourly, such as the donation of building materials to local charities.</p>		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-028	Newham Muslim Burial Association	NTR Planning	Reg19-E-028/001	General							Blank	Blank						Blank	<p>1. Introduction</p> <p>1.1 These representations are made on behalf of our clients, Newham Muslim Burial Association (NMBA), in response to the Current Consultation: Draft Submission Local Plan 2024. Following the London Borough of Newham’s initial issues and options round of consultation held between October to December 2022 and its Draft Local Plan Consultation (Regulation 18) from January to February 2023, this Draft Local Plan Submission (Regulation 19) consultation runs until 20th September 2024.</p> <p>1.2 NMBA is an organization which represents Mosques and Muslim community groups in and around Newham (listed at Appendix NTR1)[see pg 12-14 of the representation email] and has been established in response to growing concern amongst the community as to the lack of burial provision in Newham that is suitable to meet the religious requirements of the borough’s Muslim communities. The aim of NMBA is to raise awareness within the Local Authority and the wider community about the issues surrounding burial provision, and to work with them to identify and deliver solutions.</p>		Comment noted.
Reg19-E-028	Newham Muslim Burial Association	NTR Planning	Reg19-E-028/005	General							Blank	Blank						Blank	<p>3. Representations</p> <p>3.1 This section sets out our client’s (NMBA’s) specific observations, requests, recommendations, support and objections to the Draft Newham Local Plan, under separate headings, with clear reference to the relevant section of the emerging consultation Local Plan.</p>		Comment noted.
Reg19-E-028	Newham Muslim Burial Association	NTR Planning	Reg19-E-028/016	General							Blank	Blank						Blank	<p>4.5 In addition, we respectfully draw officers’ attention to the other matters highlighted at paragraph 3.12 of these representations. [Other Matters]</p>		Comment noted.
Reg19-E-030	Susan Masters		Reg19-E-030/001	General															<p>Overall, I feel any update of the local plan should be agreed for an interim shorter term of 1 to 2 years to allow the new government to bed in before revisiting local plans.</p>		Comment noted.
Reg19-E-030	Susan Masters		Reg19-E-030/010	General															<p>My previous submission to earlier submissions focussed on my community neighbourhood area. My new submission reflects my role as Chair of Health and Adult Social Care Scrutiny and focuses on the areas of the plan that deal with health and wellbeing</p>		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-033	Thames Water		Reg19-E-033/001	General							Blank	No						Blank	As you will be aware, Thames Water are the statutory water supply and sewerage undertaker for the Borough and are hence a “specific consultation body” in accordance with the Town & Country Planning (Local Planning) Regulations 2012.		Comment noted.
Reg19-E-034	Unite Group Plc	ROK Planning	Reg19-E-034/001a	General							Blank	Blank						Blank	<p>LONDON BOROUGH OF NEWHAM – THIRD CONSULTATION: DRAFT SUBMISSION LOCAL PLAN (REGULATION 19)</p> <p>ROK PLANNING ON BEHALF OF UNITE GROUP PLC</p> <p>I write on behalf of our client, Unite Group Plc ('Unite'), to submit representations to London Borough of Newham's ('the Council') Draft Local Plan Regulation 19 Consultation.</p> <p>Unite Students is the UK's leading manager and developer of purpose-built student accommodation (PBSA), providing homes to 70,000 students across 157 properties in 23 leading university towns and cities. In London, Unite provides student accommodation to circa 12,712 students across 32 properties in the City.</p> <p>Recent reports from CBRE state that London is home to around 400,00 full time students, the largest student population in the UK. However, there are only just over 100,000 PBSA</p> <p>These representations follow Unite's earlier representations made at the Issues and Options Consultation to the Draft Newham Local Plan in December 2021 and to the Regulation 18 Consultation in February 2023. This is the final opportunity to comment on the draft submission local plan with consultation ending at 5pm on 6 September 2024. Unite wish to make representations to the following policies:</p> <ul style="list-style-type: none">• Policy H8 – Purpose-built student accommodation• Policy H5 – Build to Rent housing• Policy H11 – Housing design quality• Policy D2 – Public realm net gain• Policy D4 – Tall Buildings• Policy CE2 – Zero Carbon development• Policy CE3 – Embodied Carbon and the circular economy• Policy T3 – Transport Behaviour Change• Policy N8 – Stratford and Maryland and Site Allocation N8.SA2 Stratford Station		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-034	Unite Group Plc	ROK Planning	Reg19-E-034/001c	General							Blank	Blank						Blank	These representations follow Unite’s earlier representations made at the Issues and Options Consultation to the Draft Newham Local Plan in December 2021 and to the Regulation 18 Consultation in February 2023. This is the final opportunity to comment on the draft submission local plan with consultation ending at 5pm on 6 September 2024. Unite wish to make representations to the following policies: <ul style="list-style-type: none">• Policy H8 – Purpose-built student accommodation• Policy H5 – Build to Rent housing• Policy H11 – Housing design quality• Policy D2 – Public realm net gain• Policy D4 – Tall Buildings• Policy CE2 – Zero Carbon development• Policy CE3 – Embodied Carbon and the circular economy• Policy T3 – Transport Behaviour Change• Policy N8 – Stratford and Maryland and Site Allocation N8.SA2 Stratford Station		Comment noted.
Reg19-E-034	Unite Group Plc	ROK Planning	Reg19-E-034/019	General							Blank	Blank						Blank	If you require further clarification or wish to discuss this further, please do not hesitate to contact either (contact details redacted) , (contact details redacted) or myself at this office.		Comment noted.
Reg19-E-035	Newham 6th Form College	Quadrant Town Planning	Reg19-E-035/001	General															Quadrant Town Planning is instructed by Newham Sixth Form College (NewVlc) and Newham College London to submit representations on the Newham Local Plan Regulation 19 Submission Version. 1.2 The aim of these representations is to: <ul style="list-style-type: none">• Highlight the education and skills shortage in Newham• Focus on the role of NewVlc and Newham College in meeting that need• Outline the vision for the College over the Plan period• Identify the need for policy flexibility to enable NewVlc to manage its estate and respond to educational needs within the Borough		Comment noted.
Reg19-E-035	Newham 6th Form College	Quadrant Town Planning	Reg19-E-035/002	General															Accordingly, these representations seek to address the following policies: <ul style="list-style-type: none">• Policy SI1 Existing Community Facilities and Health Facilities• Policy SI2 New and Re-provided Community Facilities and Health Facilities• Policy GWS1 Green Spaces• Site Allocation N10.SA2 Newham Sixth Form College		Comment noted.

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Reg19-E-035	Newham 6th Form College	Quadrant Town Planning	Reg19-E-035/013	General															3.3 NPPF provides a presumption in favour of sustainable development on brownfield sites in locations which are accessible by public transport. It promotes social inclusion and the need to deliver sufficient community and cultural facilities and services to meet local needs. In respect of education provision, paragraph 100 states as follows: “To ensure faster delivery of other public service infrastructure such as further education colleges, hospitals and criminal justice accommodation, local planning authorities should also work proactively and positively with promoters, delivery partners and statutory bodies to plan for required facilities and resolve key planning issues before applications are submitted.”		Comment noted.
Reg19-E-040	Noormoham med Polli		Reg19-E-040/003	General							No	No							Duty to Cooperate: The draft plan does not sufficiently engage with local stakeholders, including our community. This failure to meaningfully collaborate demonstrates non-compliance with the duty to cooperate, which is a legal requirement. [originally put against Policy SI1, SI2 and SI3, paragraph 455,456 and policies map N7 SA1, however taken this part of the response forward against General]	To make the Local Plan legally compliant and sound, the following modifications are necessary: Community Engagement and Collaboration: Our community is eager to collaborate with landowners and the relevant authorities to design and deliver a replacement facility that reflects the actual needs of its users. This collaboration is essential for ensuring the facility is functional, inclusive, and adaptable to future growth. The plan should specifically outline mechanisms for ongoing consultation with the community to ensure compliance with the duty to cooperate.	Comment noted. The Duty to Cooperate is the obligation to engage on strategic matters with other Local Planning Authorities and prescribed bodies as part of the Localism Act 2011. The prescribed bodies are set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. The Duty to Cooperate does not require us to engage with local stakeholders, however this is still a requirement of the plan making process and part of our wider Council's commitment to ensuring residents can participate in our work. As such we have made wide ranging efforts to engage with local communities as part of the developing the Plan, as demonstrated in the Issues and Options, Regulation 18 and Regulation 19 Consultation Reports.
Reg19-E-041	Maimoona Siraj Khankhara		Reg19-E-041/003	General							No	No							Duty to Cooperate: The draft plan does not sufficiently engage with local stakeholders, including our community. This failure to meaningfully collaborate demonstrates non-compliance with the duty to cooperate, which is a legal requirement. [originally put against Policy SI1, SI2 and SI3, paragraph 455,456 and policies map N7 SA1, however taken this part of the response forward against General]	To make the Local Plan legally compliant and sound, the following modifications are necessary: Community Engagement and Collaboration: Our community is eager to collaborate with landowners and the relevant authorities to design and deliver a replacement facility that reflects the actual needs of its users. This collaboration is essential for ensuring the facility is functional, inclusive, and adaptable to future growth. The plan should specifically outline mechanisms for ongoing consultation with the community to ensure compliance with the duty to cooperate.	Comment noted. The Duty to Cooperate is the obligation to engage on strategic matters with other Local Planning Authorities and prescribed bodies as part of the Localism Act 2011. The prescribed bodies are set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. The Duty to Cooperate does not require us to engage with local stakeholders, however this is still a requirement of the plan making process and part of our wider Council's commitment to ensuring residents can participate in our work. As such we have made wide ranging efforts to engage with local communities as part of the developing the Plan, as demonstrated in the Issues and Options, Regulation 18 and Regulation 19 Consultation Reports.

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Reg19-E-042	Mohammed Vali		Reg19-E-042/003a	General							No	No						No	<p>The private landowners of the site are aspiring to redevelop the Abbey Mill N7 SA1 land site, and there has been no engagement to fulfil this private land use aspiration to be used by the local resident's community of Newham.</p> <p>[originally against Polcies Map Abbey Mills N7 SA1 - taking forward as General]</p>		<p>Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Issues and Options, Regulation 18 and Regulation 19 Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh</p>

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

Reg19-E-042	Mohammed Vali		Reg19-E-042/005	General							No	No					No	<p>The private sector is meant to promote diversity and exercise the Equality Act, which I believe on merits fails to meet equality assessments on the local plan draft proposal. Public sector equality requires public bodies to have due regard to the need, advance equality of the opportunity, and foster good relations between the community and people of all backgrounds when carrying out activities. I believe the local plan is impacting the Equality Act 2010 and the Well-Being Act for myself and the wider community. Abbey Mill catchment enjoys 0 (zero) Muslim community social infrastructure, enjoined by other boroughs of the vibrant city of London.</p> <p>Many of the current small faith facilities are currently utilised by the Newham stakeholders to conduct social well-being—community safety place of meeting, as the local authority does not have adequate facilities to accommodate large congregations free of charge for community social event purposes. There had been extensive policy proposals by external stakeholders and faith partners conducted in 2015 by the university in conjunction with RTPi to ensure that planning challenges faced by the faith community should be part of town centre planning proposals recommended by RTPi to town centre planners to adopt with care and due diligence.</p> <p>[originally against Polcies Map Abbey Mills N7 SA1 - taking forward as General]</p>	<p>Many of the current faith faculties utilise by the Newham stakeholders to conduct social wellbeing community safe place of meeting. As the local authority does not have adequate facilities to accommodate large congregation free of charge for community social event purpose.</p> <p>There had been extensive policy proposal by external stakeholders and faith partners conducted in2015 by the university in conjunction with RTPi to ensure the planning challenges face by the faith community should be part of town centre plannig proposal by RTPi to town centre planners to adopt with care and due diligence.</p>	<p>Comment noted. The Local Plan is a strategy to manage development in the borough, and as such touches on many aspects of people’s day to day lives through their interaction with the built environment. By its nature, the Local Plan is a high level document which is broad in scope – addressing the application of standards, guidance and targets to deliver a range of physical infrastructure, social infrastructure, housing, employment, green space and other outcomes.</p> <p>In addition, the Local Plan is limited in what it can influence. It cannot address in detail the operation of buildings and spaces that it helps deliver and it cannot require changes to happen outside of planning processes or without the involvement of the landowner.</p> <p>These two factors mean that while a full EqIA is required for the Local Plan, this is necessarily high level both in the data it can use for the assessment and the potential outcomes it can identify. Planning Policy Officers have worked with the Council’s Inclusion Officers to adapt the corporate EQIA process in a meaningful and appropriate way for the Local Plan. A range of data sources have been used that include data on the specific needs and challenges of specific sections of the population, including from Newham’s Population Surveys and the Census 2021. We believe our approach and the outcomes of the EQIA assessment are proportionate and effective for plan-making purposes.</p> <p>Further work has also been undertaken through the Community Facilities Needs Assessment, which provides further information relevant to the needs of faith groups in Newham, and has informed the policies of the Social Infrastructure chapter and the requirements to deliver community facilities within certain site allocations, including N7.SA1 Abbey Mills.</p> <p>In addition, in recognition of the policy flexibilities which are retained by applicants, the submission Local Plan includes policies in the Building a Fairer Newham chapter that require developers of larger sites to undertake further engagement (BFN2) and an assessment of Social Value and Health Impacts (BFN3) which will support applicants to consider how their scheme impacts Newham residents. These processes will be monitored through the Local Plan monitoring framework and provide learning towards the next Local Plan review and its EqIA. The Council is satisfied that this approach is proportionate and appropriate for the local plan process and meets the Council’s duties under the Equalities Act.</p>
Reg19-E-044	National Grid	Avison Young	Reg19-E-044/001	General							Blank	Blank					Blank	<p>Representations on behalf of National Grid</p> <p>National Grid Electricity Transmission has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.</p>		<p>Comment noted.</p>

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Reg19-E-044	National Grid	Avison Young	Reg19-E-044/002	General							Blank	Blank						Blank	About National Grid Electricity Transmission National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses. National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently. National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid’s core regulated businesses. Please also consult with NGV separately from NGET.		Comment noted. We have requested the correct contact details for NGV and will add them to our consultation database.
Reg19-E-044	National Grid	Avison Young	Reg19-E-044/016	Design							Blank	Blank						Blank	Further Advice NGET is happy to provide advice and guidance to the Council concerning their networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, NGET wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult NGET on any Development Plan Document (DPD) or site-specific proposals that could affect NGET’s assets.		Comment noted. We allow stakeholders to provide comments at the public consultations at each stage of the plan making process.
Reg19-E-045	Beckton Development Limited	Savills	Reg19-E-045/001	General															We are instructed by our Client, Beckton Development Ltd (“Beckton Development”), to submit representations to the Draft Submission Local Plan (Regulation 19) June 2024 document (“the draft Local Plan”) in context to Beckton Development’s land ownership and live pre-application submission at Beckton Arms, 8 Beckton Road, E16 1PU (“the Site”), located within the London Borough of Newham (LBN).		Comment noted.

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Reg19-E-045	Beckton Development Limited	Savills	Reg19-E-045/004	General															Beckton Development has considerable experience and expertise in delivering high quality housing alongside community facilities. Beckton Development is committed to developing the Site to the highest quality whilst working alongside local community organisations. Beckton Development has a strong focus on community provision varying from arts programmes, to food support, to construction skills and teaching. Beckton Developments involvement in community facilities is widespread from assisting with setting up organisations, providing funding and volunteering.		Comment noted.
Reg19-E-045	Beckton Development Limited	Savills	Reg19-E-045/008	General															Paragraph 35 of the NPPF (National Planning Policy Framework) states that Local Plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements and whether they are sound. Plans are ‘sound’ if they are: a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development; b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework. These tests of soundness should also be applied to non-strategic policies in a proportionate way, taking into account the extent to which they are consistent with relevant strategic policies of the area.		Comment noted.
Reg19-E-045	Beckton Development Limited	Savills	Reg19-E-045/010	General															Having regards to the national planning context in preparing Local Plans, we have commented on the draft Local Plan, as explained below. For any specific suggested amendments, this is shown via a box, with the relevant reference to the draft Local Plan accordingly, as follows:		Comment noted.

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Reg19-E-045	Beckton Development Limited	Savills	Reg19-E-045/039	General															Please do not hesitate to contact me or my colleague (contact details redacted) to arrange a meeting and/or you have any further queries. In any event, we would be grateful if you could keep us updated of the progress with the new draft Newham Local Plan		Comment noted.
Reg19-E-053	Mohmed Jeeva		Reg19-E-053/003	General							No	No							Duty to Cooperate: The draft plan does not sufficiently engage with local stakeholders, including our community. This failure to meaningfully collaborate demonstrates non-compliance with the duty to cooperate, which is a legal requirement. [originally put against Policy SI1, SI2 and SI3, paragraph 455,456 and policies map N7 SA1, however taken this part of the response forward against General]	To make the Local Plan legally compliant and sound, the following modifications are necessary: Community Engagement and Collaboration: Our community is eager to collaborate with landowners and the relevant authorities to design and deliver a replacement facility that reflects the actual needs of its users. This collaboration is essential for ensuring the facility is functional, inclusive, and adaptable to future growth. The plan should specifically outline mechanisms for ongoing consultation with the community to ensure compliance with the duty to cooperate.	Comment noted. The Duty to Cooperate is the obligation to engage on strategic matters with other Local Planning Authorities and prescribed bodies as part of the Localism Act 2011. The prescribed bodies are set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. The Duty to Cooperate does not require us to engage with local stakeholders, however this is still a requirement of the plan making process and part of our wider Council's commitment to ensuring residents can participate in our work. As such we have made wide ranging efforts to engage with local communities as part of the developing the Plan, as demonstrated in the Issues and Options, Regulation 18 and Regulation 19 Consultation Reports.
Reg19-E-054	Mohsin Ikbal		Reg19-E-054/003	General							No	No							Duty to Cooperate: The draft plan does not sufficiently engage with local stakeholders, including our community. This failure to meaningfully collaborate demonstrates non-compliance with the duty to cooperate, which is a legal requirement. [originally put against Policy SI1, SI2 and SI3, paragraph 455,456 and policies map N7 SA1, however taken this part of the response forward against General]	To make the Local Plan legally compliant and sound, the following modifications are necessary: Community Engagement and Collaboration: Our community is eager to collaborate with landowners and the relevant authorities to design and deliver a replacement facility that reflects the actual needs of its users. This collaboration is essential for ensuring the facility is functional, inclusive, and adaptable to future growth. The plan should specifically outline mechanisms for ongoing consultation with the community to ensure compliance with the duty to cooperate.	Comment noted. The Duty to Cooperate is the obligation to engage on strategic matters with other Local Planning Authorities and prescribed bodies as part of the Localism Act 2011. The prescribed bodies are set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. The Duty to Cooperate does not require us to engage with local stakeholders, however this is still a requirement of the plan making process and part of our wider Council's commitment to ensuring residents can participate in our work. As such we have made wide ranging efforts to engage with local communities as part of the developing the Plan, as demonstrated in the Issues and Options, Regulation 18 and Regulation 19 Consultation Reports.
Reg19-E-055	Mehboob Toliya		Reg19-E-055/003	General							No	No							Duty to Cooperate: The draft plan does not sufficiently engage with local stakeholders, including our community. This failure to meaningfully collaborate demonstrates non-compliance with the duty to cooperate, which is a legal requirement. [originally put against Policy SI1, SI2 and SI3, paragraph 455,456 and policies map N7 SA1, however taken this part of the response forward against General]	To make the Local Plan legally compliant and sound, the following modifications are necessary: Community Engagement and Collaboration: Our community is eager to collaborate with landowners and the relevant authorities to design and deliver a replacement facility that reflects the actual needs of its users. This collaboration is essential for ensuring the facility is functional, inclusive, and adaptable to future growth. The plan should specifically outline mechanisms for ongoing consultation with the community to ensure compliance with the duty to cooperate.	Comment noted. The Duty to Cooperate is the obligation to engage on strategic matters with other Local Planning Authorities and prescribed bodies as part of the Localism Act 2011. The prescribed bodies are set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. The Duty to Cooperate does not require us to engage with local stakeholders, however this is still a requirement of the plan making process and part of our wider Council's commitment to ensuring residents can participate in our work. As such we have made wide ranging efforts to engage with local communities as part of the developing the Plan, as demonstrated in the Issues and Options, Regulation 18 and Regulation 19 Consultation Reports.

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Reg19-E-056	Atik Vahora		Reg19-E-056/003	General							No	No							Duty to Cooperate: The draft plan does not sufficiently engage with local stakeholders, including our community. This failure to meaningfully collaborate demonstrates non-compliance with the duty to cooperate, which is a legal requirement. [originally put against Policy SI1, SI2 and SI3, paragraph 455,456 and policies map N7 SA1, however taken this part of the response forward against General]	To make the Local Plan legally compliant and sound, the following modifications are necessary: Community Engagement and Collaboration: Our community is eager to collaborate with landowners and the relevant authorities to design and deliver a replacement facility that reflects the actual needs of its users. This collaboration is essential for ensuring the facility is functional, inclusive, and adaptable to future growth. The plan should specifically outline mechanisms for ongoing consultation with the community to ensure compliance with the duty to cooperate.	Comment noted. The Duty to Cooperate is the obligation to engage on strategic matters with other Local Planning Authorities and prescribed bodies as part of the Localism Act 2011. The prescribed bodies are set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. The Duty to Cooperate does not require us to engage with local stakeholders, however this is still a requirement of the plan making process and part of our wider Council's commitment to ensuring residents can participate in our work. As such we have made wide ranging efforts to engage with local communities as part of the developing the Plan, as demonstrated in the Issues and Options, Regulation 18 and Regulation 19 Consultation Reports.
Reg19-E-057	Seemaben Vahora		Reg19-E-057/003	General							No	No							Duty to Cooperate: The draft plan does not sufficiently engage with local stakeholders, including our community. This failure to meaningfully collaborate demonstrates non-compliance with the duty to cooperate, which is a legal requirement. [originally put against Policy SI1, SI2 and SI3, paragraph 455,456 and policies map N7 SA1, however taken this part of the response forward against General]	To make the Local Plan legally compliant and sound, the following modifications are necessary: Community Engagement and Collaboration: Our community is eager to collaborate with landowners and the relevant authorities to design and deliver a replacement facility that reflects the actual needs of its users. This collaboration is essential for ensuring the facility is functional, inclusive, and adaptable to future growth. The plan should specifically outline mechanisms for ongoing consultation with the community to ensure compliance with the duty to cooperate.	Comment noted. The Duty to Cooperate is the obligation to engage on strategic matters with other Local Planning Authorities and prescribed bodies as part of the Localism Act 2011. The prescribed bodies are set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. The Duty to Cooperate does not require us to engage with local stakeholders, however this is still a requirement of the plan making process and part of our wider Council's commitment to ensuring residents can participate in our work. As such we have made wide ranging efforts to engage with local communities as part of the developing the Plan, as demonstrated in the Issues and Options, Regulation 18 and Regulation 19 Consultation Reports.
Reg19-E-058	Samiullah Moosa		Reg19-E-058/003	General							No	No							Duty to Cooperate: The draft plan does not sufficiently engage with local stakeholders, including our community. This failure to meaningfully collaborate demonstrates non-compliance with the duty to cooperate, which is a legal requirement. [originally put against Policy SI1, SI2 and SI3, paragraph 455,456 and policies map N7 SA1, however taken this part of the response forward against General]	To make the Local Plan legally compliant and sound, the following modifications are necessary: Community Engagement and Collaboration: Our community is eager to collaborate with landowners and the relevant authorities to design and deliver a replacement facility that reflects the actual needs of its users. This collaboration is essential for ensuring the facility is functional, inclusive, and adaptable to future growth. The plan should specifically outline mechanisms for ongoing consultation with the community to ensure compliance with the duty to cooperate.	Comment noted. The Duty to Cooperate is the obligation to engage on strategic matters with other Local Planning Authorities and prescribed bodies as part of the Localism Act 2011. The prescribed bodies are set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. The Duty to Cooperate does not require us to engage with local stakeholders, however this is still a requirement of the plan making process and part of our wider Council's commitment to ensuring residents can participate in our work. As such we have made wide ranging efforts to engage with local communities as part of the developing the Plan, as demonstrated in the Issues and Options, Regulation 18 and Regulation 19 Consultation Reports.

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Reg19-E-059	LB Hackney		Reg19-E-059/001	General							Blank	Blank						Blank	LB Hackney response to Newham Draft Submission Local Plan Regulation 19 Thank you for the opportunity to comment on the draft submission version of Newham’s Local Plan. We are committed to continuing the engagement between Newham (LBN) and Hackney (LBH) during the preparation of the draft submission Local Plan (Regulation 19) under the Duty to Cooperate.		Comment noted.
Reg19-E-060	Royal Albert Dock Trust		Reg19-E-060/001	General															I am Chair of the Royal Albert Dock Trust (“RADT”). The RADT manages the Royal Docks Watersports Centre and manages all access for watersports on both the Royal Albert Dock and the Royal Victoria Dock to the East of the footbridge. I have read the Assessment Summary Stage B for water sports in Newham. I would make the following introductory comments: 1. The Royal Albert Dock (“RAD”) and the Royal Victoria Dock (“RVD”) are incredible facilities. The RAD is only one of two accessible 2,000m courses in the South of England. 2. We have the Sports clubs listed, many of which are very much part of the Newham community, operating at the RAD. They pay a relatively small amount to access the water. 3. The RADT is a charity that furthers its objectives through our charitable partners. London Youth Rowing (“LYR”) delivers rowing and canoeing courses for young people on the RAD, the Marine Society and Sea Cadets (“MSSC”) delivers sailing and other boating on the RVD and Atlantic Pacific delivers power-boating safety courses and instruction on the RVD.		Comment noted.
Reg19-E-062	THESET LTD	Stantec	Reg19-E-062/001	General							Blank	Blank						Blank	We write on behalf of the THESET LTD to submit representations on the contents of London Borough of Newham’s (LBN) Draft Submission Local Plan (Regulation 19) June 2024 which comprise: <ul style="list-style-type: none">• Local Plan – Part 1 (Introduction, Vision and Objectives and policies);• Local Plan – Part 2 (Neighbourhoods and Appendices); and• Evidence base documents.		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-062	THESET LTD	Stantec	Reg19-E-062/004	General							No	No						Blank	<p>[Summary]</p> <p>THESET LTD seeks LBN’s agreement to revise the draft policies discussed in these representations. These representations set out objections to the Draft Local Plan. By not objecting to other parts of the Draft Local Plan and its evidence base does not mean that THESET LTD support or endorse these other parts. THESET LTD would welcome the opportunity to discuss their representations before LBN publishes and submits its Draft Local Plan to the Secretary of State (SOS) for examination in public. Should you have any queries in relation to the above, please do not hesitate to contact the writer.</p>		Comment noted.
Reg19-E-062	THESET LTD	Stantec	Reg19-E-062/005	General	HS8 Visitor accommodation						Blank	Blank						Blank	<p>1. Introduction to Representations</p> <p>1.1 Set out below are the detailed representations prepared on behalf of THESET LTD.</p> <p>1.2 These presentations are structured as follows:</p> <ul style="list-style-type: none">• Into the sub-headings based on the names of each document published by LBN; then• Underneath each sub-heading will be the representations (in support or objection to) which draw reference to the specific subject / document matter, page and paragraph; then• Each representation will explain why an objection (or support) is given and, if appropriate, explain how the document or policy should be revised or deleted to make it ‘sound’. <p>1.3 These representations should be considered under the background context set out in Section 2.</p>		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-063	University of East London	DP9	Reg19-E-063/001	General							Blank	Blank						Blank	We write on behalf of our client, University of East London ('UEL'), to provide written representations to the London Borough of Newham ('LBN') Draft Local Plan (Regulation 19) ('the Draft Plan'), which is currently subject to public consultation. UEL is one of the largest higher education providers in the borough, with three major campuses located at Docklands, Stratford and University Square Stratford. Our client therefore has a keen interest in the direction of emerging Local Plan policy, as well as LBN's objectives for development within the borough. UEL therefore welcomes the opportunity to submit written representations as part of the Regulation 19 consultation. In principle, UEL is encouraged by the strategic vision set out in the Draft Plan, including the proposed design-led approach for future development and the proposed public realm net gain requirement for new development, addressing both quantitative and functional gains. UEL would, however, wish to provide further comments below in relation to specific policies set out within the Draft Plan.		Comment noted.
Reg19-E-063	University of East London	DP9	Reg19-E-063/012	General							Blank	Blank						Blank	We trust our comments are useful as LBN progresses with the preparation of the Draft Plan and we look forward to engaging further with you at the next stage. Should you have any queries or wish to discuss any of the above then please contact David Shiels or Marcus Stuart at the above office.		Comment noted.
Reg19-E-076	Mohammed musab		Reg19-E-076/003	General							No	No							Duty to Cooperate: The draft plan does not sufficiently engage with local stakeholders, including our community. This failure to meaningfully collaborate demonstrates non-compliance with the duty to cooperate, which is a legal requirement. [originally put against Policy SI1, SI2 and SI3, paragraph 455,456 and policies map N7 SA1, however taken this part of the response forward against General]	To make the Local Plan legally compliant and sound, the following modifications are necessary: Community Engagement and Collaboration: Our community is eager to collaborate with landowners and the relevant authorities to design and deliver a replacement facility that reflects the actual needs of its users. This collaboration is essential for ensuring the facility is functional, inclusive, and adaptable to future growth. The plan should specifically outline mechanisms for ongoing consultation with the community to ensure compliance with the duty to cooperate.	Comment noted. The Duty to Cooperate is the obligation to engage on strategic matters with other Local Planning Authorities and prescribed bodies as part of the Localism Act 2011. The prescribed bodies are set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. The Duty to Cooperate does not require us to engage with local stakeholders, however this is still a requirement of the plan making process and part of our wider Council's commitment to ensuring residents can participate in our work. As such we have made wide ranging efforts to engage with local communities as part of the developing the Plan, as demonstrated in the Issues and Options, Regulation 18 and Regulation 19 Consultation Reports.
Reg19-E-078	Shoaib Ismail		Reg19-E-078/01	General	N7 Three Mills	N7.SA1 Abbey Mills													The Local Plan is not legally compliant and is unsound for several critical reasons:		Comment noted.

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Reg19-E-078	Shoaib Ismail		Reg19-E-078/06	General	N7 Three Mills	N7.SA1 Abbey Mills													Duty to Cooperate: The draft plan does not sufficiently engage with local stakeholders, including our community. This failure to meaningfully collaborate demonstrates non-compliance with the duty to cooperate, which is a legal requirement.		Comment noted. The Duty to Cooperate is the obligation to engage on strategic matters with other Local Planning Authorities and prescribed bodies as part of the Localism Act 2011. The prescribed bodies are set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. The Duty to Cooperate does not require us to engage with local stakeholders, however this is still a requirement of the plan making process and part of our wider Council's commitment to ensuring residents can participate in our work. As such we have made wide ranging efforts to engage with local communities as part of the developing the Plan, as demonstrated in the Issues and Options, Regulation 18 and Regulation 19 Consultation Reports.
Reg19-E-080	Salim Musa		Reg19-E-080/01	Neighbou rhoods	N7 Three Mills	N7.SA1 Abbey Mills					No	No						No	Policy failing on duty to co operate	Engage with community faith leaders	Comment noted. The Duty to Cooperate is the obligation to engage on strategic matters with other Local Planning Authorities, prescribed bodies as part of the Localism Act 2011. The prescribed bodies are set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. Please see our continued engagement on strategic cross boundary matters in our Duty to Cooperate Report and Statements of Common Ground with Duty to Cooperate partners. We have engaged with faith leaders at the Issues and options and Regulation 18 and 19 Consultations.
Reg19-E-081	Metropolitan Police Service - Designing Out Crime		Reg19-E-081/001	General							Blan k	Blan k						Blan k	Thank you for allowing us to comment on the above planning proposal. We have noted the Borough's plans (between 2019 to 2029) for Newham to include 47,600 new homes and a minimum of 425,000 square metres of industrial and commercial floor space. We currently work in the Metropolitan Police Service Unit of Designing Out Crime Officers (DOCOs). Our unit administers the MOPAC 'Secured by Design' (SBD) scheme. Our Team currently work in the North East Division, of which Newham is one of the 9 Boroughs that we cover.		Comment noted.
Reg19-E-081	Metropolitan Police Service - Designing Out Crime		Reg19-E-081/020	General							Blan k	Blan k						Blan k	11) Any separate comments from the MPS Estates Management Team should be given due consideration and be read alongside the comments provided in this response.		Comment noted.
Reg19-E-081	Metropolitan Police Service - Designing Out Crime		Reg19-E-081/021	General							Blan k	Blan k						Blan k	Thank you again for seeking our opinion in relation to this important document. If you require any clarification of any of the comments made, please do not hesitate to contact us at the above address.		Comment noted.

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Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/001	General															These representations have been prepared by Savills on behalf of the landowner – Aston Mansfield in relation to the Lady Trower Trust Playing Fields, Burges Road, East Ham (the Site) and are submitted in response to the consultation on the London Borough of Newham (LBN) Regulation 19 (R19) Draft Local Plan.		Comment noted.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/003	Neighbourhoods	N13 East Ham	New Site													Savills, on behalf of Aston Mansfield, welcomes the opportunity to comment on the Plan at Regulation 19 stage. At present, we object to the plan as currently prepared; this document sets out the reasoning behind this position and makes recommendations to the wording of some of the policies		Comment noted.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/006	Neighbourhoods	N13 East Ham	New Site													These representations have been prepared by Savills on behalf of the landowner – Aston Mansfield, in relation to the Lady Trower Trust Playing Fields, Burges Road, East Ham (the Site) and are submitted in response to the consultation on the London Borough of Newham (LBN) Regulation 19 (R19) Draft Local Plan. The consultation closes on 6th September 2024. LBN is seeking responses to the specific questions contained within the document. 2.2. The current consultation comprises the following documents: ▪ Newham Local Plan - Draft Local Plan, Regulation 19 for Consultation (June 2024) 2.3. LBN has also published a considerable evidence base to support the R19 Local Plan consultation. 2.4. This consultation follows the Issues and Options Consultation which took place between the 18 October and the 17 December 2021 and included a Call for Sites and Regulation 18 consultation undertaken between January and February 2023.		Comment noted.

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Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/010	Neighbou rhoods	N13 East Ham	New Site													Aston Mansfield is an East London based charity working with children, young people, and families. The objectives of the charity are to develop the community wealth of East London and promote a diverse and inclusive society in which all are free to participate. These are achieved through a number of structured programmes and a range of activities supporting people of all ages, creeds, cultures, and abilities, principally within the London Borough of Newham. 2.10. Aston Mansfield funds the more significant part of charitable activities from returns on its endowment, which includes property. As officers at LBN will be aware, Aston Mansfield is able to demonstrate the charity's approach to property development from the application at Durning Hall, which includes affordable housing.		Comment noted.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/081	Neighbou rhoods	N13 East Ham	New Site													On 30th July 2024, the incoming Labour Government published a consultation draft of the revised NPPF, this was also accompanied by an updated Standard Method formula and Written Ministerial Statement (WMS). The updated NPPF removes the use of the Standard Method as “an advisory starting point for establishing a housing requirement of an area.” 5.2. Secretary of State for Housing, Communities and Local Government Angela Rayner addressed Parliament to outline the reasons why change is necessary. Key amongst these is the need to increase the supply of new homes in England to meet the Government’s 1.5m homes target (the equivalent of 300,000 homes per year). This is in contrast to current expectations which show the rate of delivery across England will drop below 200,000 dwellings this year.		Comment noted.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/085	General															These representations have been formulated on behalf of Aston Mansfield in relation to the Lady Trower Trust Playing Fields, Burges Road. They are written in response to the consultation on the Newham Borough Council Regulation 19 Local Plan		Comment noted.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/086	Neighbou rhoods	N13 East Ham	New Site													To summarise whilst many of the policy aims are supported Savills believe the proposed local plan requires work to ensure it meets the tests of soundness, in line with the NPPF		Comment noted.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/091	General															Our client would be very keen to work with you to bring this Site forward, and to ensure that the Newham Local Plan meets the tests of soundness		Comment noted.

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Reg19-E-084	Betting Shop Operations Limited	FREETHS	Reg19-E-084/001	General							Yes	No						Yes	<p>Introduction</p> <p>1. We act on behalf of Betting Shop Operations Limited (trading as Jenningsbet / “Jennings”) and have been instructed to submit this representation objection to emerging Policy HS6 in the Draft Submission Local Plan (Regulation 19) (“the Regulation 19 Plan”).</p> <p>2. The purpose of this representation is to ensure that Jennings opinion on the emerging Policy HS6 is noted and that the wording of the policy is changed appropriately to allow more flexibility in allowing uses such as betting shops to occupy vacant units in designated centres and shopping frontages. This will also ensure the draft Local Plan achieves soundness in accordance with NPPF paragraph 35 as the current policy fails this on not being justified (criterion b) and inconsistent with national policy (criterion c).</p> <p>3. We recommend a revision to the policy in order to achieve soundness at paragraph 23 of this representation.</p> <p>Background</p> <p>4.Jennings previously occupied a unit at 49 Woodgrange Road, which was subject to redevelopment following the approval of a mixed-use redevelopment (Newham Ref: 16/02395/FUL). This development re-provided the ground floor retail units, however, the re-development did not provide for a unit that Jennings could re-occupy post-completion. Jennings continues to have a requirement to trade in the Forest Gate area and has a vested interest in the planning policy context of relevance to their use.</p>		Comment noted.
Reg19-E-084	Betting Shop Operations Limited	FREETHS	Reg19-E-084/006	General							Yes	No						Yes	<p>24.We look forward to receiving acknowledgement of this representation marked for the attention of Mark Harris / Daniel Hyde and being notified of the Plan’s progress.</p>		Comment noted.

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Reg19-E-085	Omarji Ahmed		Reg19-E-085/06	General							No	No							5. Failure to Comply with the Duty to Co-operate In order to comply with the duty to co-operate, the Council must work collaboratively with local communities and ensure that their needs are represented in the Local Plan. The current proposal suggests that sufficient consultation with key stakeholders within the community has not been conducted or acted upon. The failure to address our community's growing need for larger, inclusive facilities suggests a breakdown in the duty to co-operate and an absence of genuine collaboration. [originally against SI1, SI2 and SI3 - taking forward general]		Comment noted. The Duty to Cooperate is the obligation to engage on strategic matters with other Local Planning Authorities and prescribed bodies as part of the Localism Act 2011. The prescribed bodies are set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. The Duty to Cooperate does not require us to engage with local stakeholders, however this is still a requirement of the plan making process and part of our wider Council's commitment to ensuring residents can participate in our work. As such we have made wide ranging efforts to engage with local communities as part of the developing the Plan, as demonstrated in the Issues and Options, Regulation 18 and Regulation 19 Consultation Reports.
Reg19-E-086	Hanifa Vali	Hanifa Vali	Reg19-E-086/04	General							No	No						No	The private landowners of the site are aspiring to redevelop the Abbey Mill N7 SA1 land site, and there has been no engagement to fulfil this private land use aspiration to be used by the local resident's community of Newham. [originally against N7 SA1 - taking forward general]		Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Issues and Options, Regulation 18 and Regulation 19 Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh

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

Reg19-E-086	Hanifa Vali	Hanifa Vali	Reg19-E-086/07	General							No	No					No	<p>The mechanism of Citizen Assembly engagement approach for local plan development would not be independent as its citizens are made up of beneficiaries of Section 106 development; rather, a wider community and landowners would be appropriate channels of engagement in the formation of local plan design for this site. The private sector is meant to promote diversity and exercise the Equality Act, which I believe on merits fails to meet equality assessments on the local plan draft proposal. Public sector equality requires public bodies to have due regard to the need, advance equality of the opportunity, and foster good relations between the community and people of all backgrounds when carrying out activities. I believe the local plan is impacting the Equality Act 2010 and the Well-Being Act for myself and the wider community. Abbey Mill catchment enjoys 0 (zero) Muslim community social infrastructure, enjoined by other boroughs of the vibrant city of London. Many of the current small faith facilities are currently utilised by the Newham stakeholders to conduct social well-being—community safety place of meeting, as the local authority does not have adequate facilities to accommodate large congregations free of charge for community social event purposes. There had been extensive policy proposals by external stakeholders and faith partners conducted in 2015 by the university in conjunction with RTPi to ensure that planning challenges faced by the faith community should be part of town centre planning proposals recommended by RTPi to town centre planners to adopt with care and due diligence. [originally against N7 SA1 - taking forward general]</p>	<p>Comment noted. The Local Plan is a strategy to manage development in the borough, and as such touches on many aspects of people’s day to day lives through their interaction with the built environment. By its nature, the Local Plan is a high level document which is broad in scope – addressing the application of standards, guidance and targets to deliver a range of physical infrastructure, social infrastructure, housing, employment, green space and other outcomes.</p> <p>In addition, the Local Plan is limited in what it can influence. It cannot address in detail the operation of buildings and spaces that it helps deliver and it cannot require changes to happen outside of planning processes or without the involvement of the landowner.</p> <p>These two factors mean that while a full EqIA is required for the Local Plan, this is necessarily high level both in the data it can use for the assessment and the potential outcomes it can identify. Planning Policy Officers have worked with the Council’s Inclusion Officers to adapt the corporate EQIA process in a meaningful and appropriate way for the Local Plan. A range of data sources have been used that include data on the specific needs and challenges of specific sections of the population, including from Newham’s Population Surveys and the Census 2021. We believe our approach and the outcomes of the EQIA assessment are proportionate and effective for plan-making purposes.</p> <p>Further work has also been undertaken through the Community Facilities Needs Assessment, which provides further information relevant to the needs of faith groups in Newham, and has informed the policies of the Social Infrastructure chapter and the requirements to deliver community facilities within certain site allocations, including N7.SA1 Abbey Mills.</p> <p>In addition, in recognition of the policy flexibilities which are retained by applicants, the submission Local Plan includes policies in the Building a Fairer Newham chapter that require developers of larger sites to undertake further engagement (BFN2) and an assessment of Social Value and Health Impacts (BFN3) which will support applicants to consider how their scheme impacts Newham residents. These processes will be monitored through the Local Plan monitoring framework and provide learning towards the next Local Plan review and its EqIA. The Council is satisfied that this approach is proportionate and appropriate for the local plan process and meets the Council’s duties under the Equalities Act.</p> <p>In relation to consultation and the use of Citizen Assemblies to consult on the Plan. The Neighbourhood Assemblies used to discuss the Local Plan were separate to the participatory budget setting assemblies. In addition, a range of consultation methods were used at each stage of consultation on the Local Plan - please see details in the Consultation Reports on the Council’s website.</p>
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Reg19-E-086	Hanifa Vali	Hanifa Vali	Reg19-E-086/09	General							No	No						No	There had been extensive policy proposal by external stakeholders and faith partners conducted in2015 by the university in conjunction with RTPI to ensure the planning challenges face by the faith community should be part of town centre plannig proposal by RTPI to town centre planners to adopt with care and due diligence. [originally against N7 SA1 - proposed modifications- taking forward general]		Comment noted. The Council considers that through the Equalities Impact Assessment and further work undertaken through the Community Facilities Needs Assessment, which provides further information relevant to the needs of faith groups in Newham, and has informed the policies of the Social Infrastructure chapter and the requirements to deliver community facilities within certain site allocations, including N7.SA1 Abbey Mills, alongside consultation with the Inter-Faith Forum. we have suitably and proportionally considered the needs of faith organisations.
Reg19-E-087	Talhah Khapee		Reg19-E-087/06	General								No						No	Duty to Cooperate: The draft plan does not sufficiently engage local stakeholders, including our community. This failure to effectively collaborate breaches the legal requirement to cooperate. [originally against SI1, SI2 and SI3 - taking forward general]	<p>To make the Local Plan legally compliant and robust, the following key adjustments are essential: Community Engagement and Collaboration: Our community is ready to work alongside landowners and relevant authorities to design and deliver a replacement facility that genuinely meets the needs of its users. This collaboration is vital to ensure the facility is practical, inclusive, and able to accommodate future growth. The plan must include specific provisions for ongoing community consultation to fulfil the legal duty to cooperate.</p> <p>...By adopting these revisions, the Local Plan will achieve legal compliance and soundness, ensuring it addresses community needs while promoting long-term growth and sustainability within the borough.</p>	Comment noted. The Duty to Cooperate is the obligation to engage on strategic matters with other Local Planning Authorities and prescribed bodies as part of the Localism Act 2011. The prescribed bodies are set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. The Duty to Cooperate does not require us to engage with local stakeholders, however this is still a requirement of the plan making process and part of our wider Council's commitment to ensuring residents can participate in our work. As such we have made wide ranging efforts to engage with local communities as part of the developing the Plan, as demonstrated in the Issues and Options, Regulation 18 and Regulation 19 Consultation Reports.
Reg19-E-088	Yusuf Mahmood		Reg19-E-088/01	General							No	No						No	N7 SA1 Fail Duty to Cooperate.		Comment noted. The Duty to Cooperate is the obligation to engage on strategic matters with other Local Planning Authorities and prescribed bodies as part of the Localism Act 2011. The prescribed bodies are set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. The Council considers that we have fulfilled this requirement and our approach is set out in our Duty to Cooperate Report which is published on the Council's website.

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Reg19-E-090	Huzaiifa Khankhara		Reg19-E-090/06	General							No	No							Duty to Cooperate: The draft plan does not sufficiently engage with local stakeholders, including our local community. This failure to meaningfully collaborate demonstrates non-compliance with the duty to cooperate, which is a legal requirement.		Comment noted. The Duty to Cooperate is the obligation to engage on strategic matters with other Local Planning Authorities and prescribed bodies as part of the Localism Act 2011. The prescribed bodies are set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. The Duty to Cooperate does not require us to engage with local stakeholders, however this is still a requirement of the plan making process and part of our wider Council's commitment to ensuring residents can participate in our work. As such we have made wide ranging efforts to engage with local communities as part of the developing the Plan, as demonstrated in the Issues and Options, Regulation 18 and Regulation 19 Consultation Reports.
Reg19-E-091	IQL Office LP	Quod	Reg19-E-091/001	General							Blank	No						Blank	<p>London Borough of Newham – Local Plan Review – Draft Submission Local Plan Consultation (Regulation 19) – September 2024</p> <p>I write on behalf of IQL Office LP in relation to the London Borough of Newham's (LBN) Submission Draft Local Plan on behalf of the Stratford Cross.</p> <p>Stratford Cross is located within the Stratford Metropolitan Centre between Westfield Stratford City and the education and culture district of East Bank. It currently sits within the London Legacy Development Corporation (LLDC) local planning authority area, which will hand powers back to LBN on 1st December 2024.</p> <p>Stratford Cross is located within Site Allocation SA3.1: Stratford Town Centre West of the LLDC Local Plan, which will remain the adopted development plan until the new LBN Local Plan is adopted.</p> <p>Representations were made in February 2023 on the previous LBN Local Plan consultation relating to heights, appropriate commercial land uses in the Stratford Metropolitan Centre and concerns about some of the restrictive housing mix policies. This current consultation has taken on board previous comments on appropriate land uses but not all issues raised about tall building zone boundaries and heights, or restrictive housing mix policies have been fully taken account of and therefore, form the basis of these representations.</p>		Comment noted.

[illegible]

Representation Reference	Repsentor	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>Stratford Cross is a managed estate and therefore has a long-term interest in the creating and sustaining a successful community in the Metropolitan Centre and has been helping support the wider regeneration of the area through the provision of play and amenities for the wider community in the public realm.</p> <p>Subsequently, our representations are focussed around ensuring the emerging policy is consistent with existing consents across Stratford Cross and the long-term interest in the successful growth of Stratford Metropolitan Centre.</p>		
Reg19-E-091	IQL Office LP	Quod	Reg19-E-091/007	General							Blank	No						Blank	[In general, we support the encouragement for a wide range of town centre uses to come forward in Stratford Metropolitan Centre, but our key concerns remain that:]...General challenges around the prescriptive nature of policies and requirements for viability assessments if these are not met.		Comment noted.
Reg19-E-091	IQL Office LP	Quod	Reg19-E-091/008	General							Blank	No						Blank	Responses are set out in Appendix 1, with supporting plans provided in Appendix 2 and 3 and the consultation form completed and attached as Appendix 4.		Comment noted.
Reg19-E-091	IQL Office LP	Quod	Reg19-E-091/009	General							Blank	No						Blank	Stratford Cross welcomes the opportunity to make representations at this stage of the Local Plan process and look forward to future discussions with the Planning Policy Team on later consultation stages of the Local Plan.		Comment noted.

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Reg19-E-092	SCBD Ltd	Quod	Reg19-E-092/001	General							Blank	Yes							<p>London Borough of Newham – Local Plan Review – Draft Submission Local Plan Consultation (Regulation 19) – September 2024</p> <p>We are instructed to submit representations on the London Borough of Newham’s Draft Submission Local Plan on behalf of Stratford City Business District Limited (“SCBD Ltd”) set out in this letter and the completed response form in [Appendix 1].</p> <p>SCBD Ltd is a major landowner that is the principal owner of Stratford Cross, which is located within the Stratford Metropolitan Centre boundary and currently sits within the local planning authority boundary of the London Legacy Development Corporation (LLDC).</p> <p>SCBD Ltd also owns the Triangle site located in a central location between the Metropolitan Centre, UCL East and Stratford Station (the “Site”), which as subsequently been incorporated into Site Allocation N8.SA2 Stratford Station.</p>		Comment noted.
Reg19-E-092	SCBD Ltd	Quod	Reg19-E-092/004	General							Blank	Yes							<p>SCBD Ltd welcomes the opportunity to discuss the potential for the Sites further with the London Borough of Newham through the emerging Local Plan process.</p>		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-093	Bellway Homes (Thames Gateway) Limited	Savills	Reg19-E-093/001	General															<p>These representations to the London Borough of Newham (LBN) consultation on the draft Local Plan Regulation 19 are submitted on behalf of our client, Bellway Homes (Thames Gateway) Limited. This consultation is on the draft submission version of the new Local Plan for Newham. The draft Local Plan has been informed by the responses the Council received throughout the previous Regulation 18 consultation in early 2023. It has also been informed by evidence base documents which include research on specific topics and emerging borough-wide and regional strategies. These representations focus on the site specific allocation for Bellway’s sites, including our observations and suggested amendments to the draft policies to which our client deems relevant for consideration. Throughout this representation we propose text amendments (in red text).</p> <p>1. Bellway’s Sites</p> <p>Our client owns sites at Pudding Mill Island (known as “Legacy Wharf Phase 1”, “Legacy Wharf Phase 2” and “Legacy Wharf Phase 3” amounting collectively to c.2.41 ha of land. Legacy Wharf Phase 1 is now built out and occupied, and construction is underway at Legacy Wharf Phase 2. The London Legacy Development Corporation (LLDC) resolved to grant hybrid planning permission at the Legacy Wharf Phase 3 site in June 2024, and the drafting of the S106 Agreement is ongoing.</p> <p>The sites are all located in the Pudding Mill Lane area of the London Borough of Newham, but are currently within the administrative boundary of the LLDC as the planning authority.</p> <p>The LLDC will cease its planning functions on midnight of 30 November 2024, and the sites will return to being covered by the planning powers of LBN. The sites are located at the junction of Barbers Road and Cooks Road, extending south towards the Bow Back River.</p> <p>The wider Pudding Mill Lane area is an island site bounded on the three sides by the waterways and to the north by the railway line / Crossrail land. The site also adjoins the Legacy Community Scheme PDZ</p> <p>8 land to the north east, which is currently occupied by the temporary ABBA Arena, and the Vulcan Wharf development site to the south west.</p>		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-093	Bellway Homes (Thames Gateway) Limited	Savills	Reg19-E-093/003	General															The LLDC prepared an SPD for the Pudding Mill area, which was adopted in March 2017. As this is part of the LLDC’s development plan, we assume that this will be revoked upon the adoption of the Newham Local Plan and planning powers returning to Newham. We would welcome confirmation of this.		The Council will review all Supplementary Planning Documents, both LBN and LLDC, on adoption of the Local Plan and make recommendations on which to revoke or withdraw at that point. This will be a decision for Cabinet.
Reg19-E-093	Bellway Homes (Thames Gateway) Limited	Savills	Reg19-E-093/013	General															4. Summary Bellway requests that consideration is given to the comments within this letter as we believe they would help to address the identified issues and make the draft Local Plan justified, positively prepared, effective and consistent with national policy. We request that our representations are considered and would be pleased to discuss the comments raised further with officers. At this stage we would like to reserve the right to appear at the Examination in Public at the appropriate time.		Comment noted.
Reg19-E-095	Get Living Plc	Quod	Reg19-E-095/001	General							Blank	No						Blank	London Borough of Newham – Local Plan Review – Draft Submission Local Plan Consultation (Regulation 19) – September 2024 We are instructed to submit representations on the London Borough of Newham’s (LBN) Submission Draft Local Plan on behalf of Get Living Plc (“GL”). GL is the UK’s leading build-to-rent (“BtR”) operator of large-scale residential neighbourhoods. Get Living’s portfolio comprises 4,500 homes for rent across five neighbourhoods: East Village and Elephant Central in London, One Maidenhead in Berkshire and New Maker Yards in Salford, Greater Manchester and The Filigree in Lewisham. Future neighbourhoods are planned or under construction across the UK, including London, Birmingham and Leatherhead, delivering a further 4,300 homes.		Comment noted.
Reg19-E-095	Get Living Plc	Quod	Reg19-E-095/008	General							Blank	No						Blank	GL welcomes the opportunity to make representations at this stage of the Local Plan process and look forward to future discussions with the Planning Policy Team on later stages of the Local Plan.		Comment noted.
Reg19-E-096	Redefine Hotels Portfolio IV Ltd	Savills	Reg19-E-096/001	General								No							We think that the emerging local plan can be made sound through the amendments suggested in our submitted letter.		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-096	Redefine Hotels Portfolio IV Ltd	Savills	Reg19-E-096/002	General															We write on behalf of our client, Redefine Hotels Portfolio IV Ltd, in response to the Council's consultation on the Draft Submission Local Plan (Regulation 19). This letter is primarily concerned with the Holiday Inn Express, 1 Silvertown Way, Newham (hereafter 'the Site'), as outlined in red on the enclosed Site Location Plan, [Attachment Canning Town HIX - LBN Site Location Plan] for which our client holds the freehold interest.		Comment noted.
Reg19-E-098	Nafees Khojji		Reg19-E-098/03	General							No	No							Duty to Cooperate: The draft plan does not sufficiently engage with local stakeholders, including our community. This failure to meaningfully collaborate demonstrates non-compliance with the duty to cooperate, which is a legal requirement. [originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward general]	<p>To make the Local Plan legally compliant and sound, the following modifications are necessary:</p> <p>Community Engagement and Collaboration: Our community is eager to collaborate with landowners and the relevant authorities to design and deliver a replacement facility that reflects the actual needs of its users. This collaboration is essential for ensuring the facility is functional, inclusive, and adaptable to future growth. The plan should specifically outline mechanisms for ongoing consultation with the community to ensure compliance with the duty to cooperate.</p> <p>By implementing these modifications, the Local Plan will become both legally compliant and sound, ensuring it serves the needs of the community while fostering long-term growth and sustainability for the borough.</p>	Comment noted. The Duty to Cooperate is the obligation to engage on strategic matters with other Local Planning Authorities and prescribed bodies as part of the Localism Act 2011. The prescribed bodies are set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. The Duty to Cooperate does not require us to engage with local stakeholders, however this is still a requirement of the plan making process and part of our wider Council's commitment to ensuring residents can participate in our work. As such we have made wide ranging efforts to engage with local communities as part of the developing the Plan, as demonstrated in the Issues and Options, Regulation 18 and Regulation 19 Consultation Reports.
Reg19-E-100	Simpson and Goldstein	Lichfields	Reg19-E-100/002	General							Yes	No						Yes	<p>S&G submitted representations to the Regulation 18 Draft Local Plan in February 2023. Since the submission of the representations, S&G has engaged with LBN through a series of pre-application meetings, has attended a Design Review Panel (DRP) in relation to the redevelopment of the Site, and has now submitted a planning application for the following development:</p> <p>“Demolition and redevelopment of the site to provide a large-scale Purpose Built Shared Living development (sui generis use) and ancillary amenity facilities, with flexible commercial floorspace, landscaping, access improvements and other associated works.”</p>		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-100	Simpson and Goldstein	Lichfields	Reg19-E-100/003	General							Yes	No						Yes	S&G continues to be broadly supportive of the vision and objectives of the draft Local Plan. However, there are a number of policies which they consider are too prescriptive and which could impede LBN's ability to meet the plan's overarching objectives. The current wording of certain parts of the Local Plan is not positively prepared, not justified and not effective. This letter sets out S&G's responses. The comments are organised by the theme and policy that they relate to. We have commented on whether the plan is sound based on the NPPF's four tests of soundness throughout the letter.		Comment noted.
Reg19-E-100	Simpson and Goldstein	Lichfields	Reg19-E-100/024	General							Yes	No						Yes	<p>Summary</p> <p>S&G welcome the opportunity to comment on the emerging Newham Local Plan. ...</p> <p>The opportunity for sustainable, co-residential development at the Site through draft designation LMUA6, Ashburton Terrace is supported in principle subject to the comments set out above. Overall, the plan should make clear that any reference to residential uses within the plan includes co-living.</p> <p>S&G intends to continue to participate in the preparation of the draft Local Plan and looks forward to any further opportunities to be involved in the process in the coming months to shape the draft Local Plan.</p>		Comment noted. Specific responses to your detailed representations are provided in the relevant sections of the consultation report.
Reg19-E-101	Haroon Ansari		Reg19-E-101/01	General	N7 Three Mills	N7.SA1 Abbey Mills					No	No							I am nor agree with New Ham Council Plan it is impacted the concerned community and land owner. [originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward general]	New Ham Councill has to discuss with community leaders and land owner.	Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh
Reg19-E-102	Network Rail		Reg19-E-102/001	General							Blank	Blank						Blank	I am writing on behalf of Network Rail (NR) in respect of the Newham Local Plan Regulation 19 consultation. Thank you for consulting NR on the draft submission of the Local Plan. Please consider this letter the formal NR response to the consultation.		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-102	Network Rail		Reg19-E-102/002	General							Blank	No						Blank	NR welcomes the support and commitments detailed within the draft Local Plan and Site Allocations for improvements to railway infrastructure and public transport, particularly at Stratford Station and West Ham Station. NR looks forward to continuing to work closely with the London Borough of Newham to ensure the required railway infrastructure improvements can be successfully delivered. Nevertheless, there are a number of outstanding matters that NR believes need to be addressed for the Local Plan to be found sound. Please refer to Appendix 1 and Appendix 2 to view NR's feedback on these matters.		Comment noted.
Reg19-E-102	Network Rail		Reg19-E-102/003	General							Blank	Blank						Blank	Network Rails: Land to the South of Anthems Way, Stratford, E20 Please note that a separate consultation response in respect of Network Rail's Land to the South of Anthems Way, Stratford, E20 was submitted to the London Borough of Newham's Planning Policy team on 16/08/2024.		Comment noted.
Reg19-E-103	Munaf Patel		Reg19-E-103/01	General	N7 Three Mills	N7.SA1 Abbey Mills					No	No							New Ham Council had to discuss with concerned community leaders and land owner before making a draft or proposal. [originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward general]	New Ham Council has taken a bias decision. It Should be unbiased and consulted with concern community before making it.	Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh
Reg19-E-104	Yusuf Adam		Reg19-E-104/01	General	N7 Three Mills	N7.SA1 Abbey Mills					No	No							New Ham Council Proposal is Concerning the community who is currently using the land. It is not suitable. [originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward general]	New Ham Council have to discuss with concerned community before making a draft or proposal.	Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh
Reg19-E-105	Shoiab Abdul Samad		Reg19-E-105/01	General	N7 Three Mills	N7.SA1 Abbey Mills					No	No							New Ham Council plan is drafted without taking consultation with concerned community or land owner. It is biased. [originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward N7.SA1]	New Ham Council has to discuss with community leaders and land owner. After that they have to make any decision.	Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh
Reg19-E-106	Zakariyah Mamun		Reg19-E-106/01	General	N7 Three Mills	N7.SA1 Abbey Mills					No	No							New Ham Council plan is made without taking any feedback from the concern community or land owner. [originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward general]	New Ham Council has to discuss with community leaders and land owner.	Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh

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Reg19-E-107	Mohmed Hanif Patel		Reg19-E-107/01	General							No	No							New ham council proposal is improper as they have not consulted the land owner or a Muslim community before making a proposal. [originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward general]	New ham council has to meet the land owner and community leaders.	Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh
Reg19-E-108	Aamir Ismail		Reg19-E-108/01	General							No	No							NewHam Council plan is biased As they had not consulated with concern community and land owner. [originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward general]	NewHam Council has to discuss with community leaders and land owner.	Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh
Reg19-E-109	Fatima Anika Akhtar		Reg19-E-109/01	General							No	No						No	The Local Plan is not legally compliant and is unsound for several critical reasons: Our community is eager to collaborate with the landowners and relevant authorities to deliver a replacement facility that meets our needs. We believe that working together can lead to a solution that benefits all parties involved. [originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward general]	To make the Local Plan legally compliant and sound, the following modifications are necessary: Community Engagement and Collaboration: Our community is eager to collaborate with landowners and the relevant authorities to design and deliver a replacement facility that reflects the actual needs of its users. This collaboration is essential for ensuring the facility is functional, inclusive, and adaptable to future growth. The plan should specifically outline mechanisms for ongoing consultation with the community to ensure compliance with the duty to cooperate.this critical evaluation, the plan will remain disconnected from the actual requirements of the community.	Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.
Reg19-E-109	Fatima Anika Akhtar		Reg19-E-109/01	General							No	No						No	Duty to Cooperate: The draft plan does not sufficiently engage with local stakeholders, including our community. This failure to meaningfully collaborate demonstrates non-compliance with the duty to cooperate, which is a legal requirement.		Comment noted. The Duty to Cooperate is the obligation to engage on strategic matters with other Local Planning Authorities and prescribed bodies as part of the Localism Act 2011. The prescribed bodies are set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. The Duty to Cooperate does not require us to engage with local stakeholders, however this is still a requirement of the plan making process and part of our wider Council's commitment to ensuring residents can participate in our work. As such we have made wide ranging efforts to engage with local communities as part of the developing the Plan, as demonstrated in the Issues and Options, Regulation 18 and Regulation 19 Consultation Reports.

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

Reg19-E-112	SEGRO	Gerald Eve	Reg19-E-112/001	General							Blank	No					Blank	<p>Representations to the Third Consultation: Draft Submission Newham Local Plan (Regulation 19)</p> <p>On behalf of our client, SEGRO, we welcome the opportunity to comment on the Regulation 19 Version of the Newham Local Plan. This follows the previous consultation held in February 2023 to the Regulation 18 Version of the Local Plan, to which SEGRO also submitted representations. These are appended to this letter.</p> <p>SEGRO are keen to work with LB Newham to help ensure that the Plan is found to be sound in accordance with paragraph 35 of the National Planning Policy Framework (NPPF).</p> <p>Paragraph 35 of the NPPF states that “Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are ‘sound’ if they are:</p> <p>a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;</p> <p>b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</p> <p>c) Effective – deliverable over the plan period, and based on effective joint working on cross- boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and</p> <p>d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant”.</p> <p>Paragraph 36 of the NPPF is clear that the above-mentioned tests of soundness will be applied to non- strategic policies i.e., where these are contained within a Local Plan in a proportionate way, taking into account the extent to which they are consistent with relevant strategic policies for the area.</p> <p>Where relevant, these representations assess the proposed changes against the four tests for soundness of policy set out within the NPPF.</p> <p>Summary of Representations SEGRO’s representations to the Regulation Version of the Local Plan are set out in the following table.</p>	Comment noted.
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Reg19-E-112	SEGRO	Gerald Eve	Reg19-E-112/031	General							Blank	No						Blank	As a long-term stakeholder and investor in Newham, SEGRO welcome the opportunity keen to engage with LB Newham to help shape the future of the area and welcome future involvement in the preparation of this plan and Examination in Public. If you have any queries, please contact contact details redacted .		Comment noted.
Reg19-E-113	Harun Yusuf Vali Molvi		Reg19-E-113/01	General							No	No							NewHam Council Plan is lack of community concern as Muslim community has a lot of requirements. So, first Newham Council has to listen the concern of community. [originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward general]		Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh
Reg19-E-114	Ishak Aswat		Reg19-E-114/01	General							No	No							NewHam Council Plan is lack of community concern as Muslim community has a lot of requirements. So, first Newham Council has to listen the concern of community. [originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward general]	NewHam Council has to discuss with community leaders and land owner.	Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh
Reg19-E-115	Abdulrasheed Patel		Reg19-E-115/01	General							No	No							NewHam Council Plan is biased. They need to talk with concern community. As community has a requirement of purpose built facility which helps to improve the community. [originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward general]	NewHam Council has to discuss with community leaders and land owner.	Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh
Reg19-E-117	Sajid Bhai Vahora		Reg19-E-117/02	General							No	No						No	The Local Plan is not legally compliant and is unsound for several critical reasons: Our community is eager to collaborate with the landowners and relevant authorities to deliver a replacement facility that meets our needs. We believe that working together can lead to a solution that benefits all parties involved. [originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward general]		Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.
Reg19-E-118	Qaisar Sultan		Reg19-E-118/01	General							No	No							NewHam Council Plan is done without consulting concern community and land owner. It is biased. [originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward general]	Concerned community has their plans for development so Newham Council has to discuss with the land owner and concern Community.	Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh

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Reg19-E-119	MD Shaiful Azam		Reg19-E-119/02	General							No	No						No	The Local Plan is not legally compliant and is unsound for several critical reasons: Our community is eager to collaborate with the landowners and relevant authorities to deliver a replacement facility that meets our needs. We believe that working together can lead to a solution that benefits all parties involved. [originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward general]	Community Engagement and Collaboration: Our community is eager to collaborate with landowners and the relevant authorities to design and deliver a replacement facility that reflects the actual needs of its users. This collaboration is essential for ensuring the facility is functional, inclusive, and adaptable to future growth.	Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.
Reg19-E-119	MD Shaiful Azam		Reg19-E-119/03	General							No	No						No	Duty to Cooperate: The draft plan does not sufficiently engage with local stakeholders, including our community. This failure to meaningfully collaborate demonstrates non-compliance with the duty to cooperate, which is a legal requirement. [originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward general]	The plan should specifically outline mechanisms for ongoing consultation with the community to ensure compliance with the duty to cooperate.	Comment noted. The Duty to Cooperate is the obligation to engage on strategic matters with other Local Planning Authorities and prescribed bodies as part of the Localism Act 2011. The prescribed bodies are set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. The Duty to Cooperate does not require us to engage with local stakeholders, however this is still a requirement of the plan making process and part of our wider Council's commitment to ensuring residents can participate in our work. As such we have made wide ranging efforts to engage with local communities as part of the developing the Plan, as demonstrated in the Issues and Options, Regulation 18 and Regulation 19 Consultation Reports.
Reg19-E-121	Osman Bin Mahmood Bakindwan		Reg19-E-121/03	General							No	No						No	The Local Plan is not legally compliant and is unsound for several critical reasons: Our community is eager to collaborate with the landowners and relevant authorities to deliver a replacement facility that meets our needs. We believe that working together can lead to a solution that benefits all parties involved. [originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward general]	Community Engagement and Collaboration: Our community is eager to collaborate with landowners and the relevant authorities to design and deliver a replacement facility that reflects the actual needs of its users. This collaboration is essential for ensuring the facility is functional, inclusive, and adaptable to future growth.	Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.

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Reg19-E-121	Osman Bin Mahmood Bakindwan		Reg19-E-121/04	General							No	No						No	Duty to Cooperate: The draft plan does not sufficiently engage with local stakeholders, including our community. This failure to meaningfully collaborate demonstrates non-compliance with the duty to cooperate, which is a legal requirement. [originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward general]	The plan should specifically outline mechanisms for ongoing consultation with the community to ensure compliance with the duty to cooperate.	Comment noted. The Duty to Cooperate is the obligation to engage on strategic matters with other Local Planning Authorities and prescribed bodies as part of the Localism Act 2011. The prescribed bodies are set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. The Duty to Cooperate does not require us to engage with local stakeholders, however this is still a requirement of the plan making process and part of our wider Council's commitment to ensuring residents can participate in our work. As such we have made wide ranging efforts to engage with local communities as part of the developing the Plan, as demonstrated in the Issues and Options, Regulation 18 and Regulation 19 Consultation Reports.
Reg19-E-123	Abrar Vahora		Reg19-E-123/01	General							No	No							NewHam Council did a proposal which is irrelevant and it is biased. [originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward general]	Concerned community has their plans for development so Newham Council needs to discuss with them.	Comment noted.
Reg19-E-127	Raihan Vahora		Reg19-E-127/01	General							No	No							NewHam Council proposal is biased and proposed without consultation. [originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward general]	Concerned community has their plans for development ,Newham Council has to connect with them.	Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.
Reg19-E-128	Atik Shaikh		Reg19-E-128/01	General							No	No						No	The Local Plan is not legally compliant and is unsound for several critical reasons: Our community is eager to collaborate with the landowners and relevant authorities to deliver a replacement facility that meets our needs. We believe that working together can lead to a solution that benefits all parties involved. [originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward general]		Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.

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-128	Atik Shaikh		Reg19-E-128/04	General							No	No						No	Duty to Cooperate: The draft plan does not sufficiently engage with local stakeholders, including our community. This failure to meaningfully collaborate demonstrates non-compliance with the duty to cooperate, which is a legal requirement. [originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward general]	<p>To make the Local Plan legally compliant and sound, the following modifications are necessary:</p> <p>Community Engagement and Collaboration: Our community is eager to collaborate with landowners and the relevant authorities to design and deliver a replacement facility that reflects the actual needs of its users. This collaboration is essential for ensuring the facility is functional, inclusive, and adaptable to future growth. The plan should specifically outline mechanisms for ongoing consultation with the community to ensure compliance with the duty to cooperate.</p> <p>By implementing these modifications, the Local Plan will become both legally compliant and sound, ensuring it serves the needs of the community while fostering long-term growth and sustainability for the borough.</p>	Comment noted. The Duty to Cooperate is the obligation to engage on strategic matters with other Local Planning Authorities and prescribed bodies as part of the Localism Act 2011. The prescribed bodies are set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. The Duty to Cooperate does not require us to engage with local stakeholders, however this is still a requirement of the plan making process and part of our wider Council's commitment to ensuring residents can participate in our work. As such we have made wide ranging efforts to engage with local communities as part of the developing the Plan, as demonstrated in the Issues and Options, Regulation 18 and Regulation 19 Consultation Reports.
Reg19-E-129	Issa Nawab		Reg19-E-129/01	General								No						No	NewHam Council Plan is inappropriate. They have to consult concerned community as community requires a purpose built facility. [originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward general]	NewHam Council has to discuss with community leaders and land owner. They have to consult with them.	Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh
Reg19-E-131	Mohammada kib Bohara		Reg19-E-131/003	General							No	No						No	Duty to Cooperate: The draft plan does not sufficiently engage with local stakeholders, including our community. This failure to meaningfully collaborate demonstrates non-compliance with the duty to cooperate, which is a legal requirement.	<p>To make the Local Plan legally compliant and sound, the following modifications are necessary:</p> <p>Community Engagement and Collaboration: Our community is eager to collaborate with landowners and the relevant authorities to design and deliver a replacement facility that reflects the actual needs of its users. This collaboration is essential for ensuring the facility is functional, inclusive, and adaptable to future growth. The plan should specifically outline mechanisms for ongoing consultation with the community to ensure compliance with the duty to cooperate.</p>	Comment noted. The Duty to Cooperate is the obligation to engage on strategic matters with other Local Planning Authorities and prescribed bodies as part of the Localism Act 2011. The prescribed bodies are set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. The Duty to Cooperate does not require us to engage with local stakeholders, however this is still a requirement of the plan making process and part of our wider Council's commitment to ensuring residents can participate in our work. As such we have made wide ranging efforts to engage with local communities as part of the developing the Plan, as demonstrated in the Issues and Options, Regulation 18 and Regulation 19 Consultation Reports.

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-135	Faizan Vahora		Reg19-E-135/003	General							No	No						No	<p>Duty to Cooperate: The draft plan does not sufficiently engage with local stakeholders, including our community. This failure to meaningfully collaborate demonstrates non-compliance with the duty to cooperate, which is a legal requirement.</p> <p>[originally put against Policy SI1, SI2 and SI3, paragraph 455,456 and policies map N7 SA1, however taken this part of the response forward against General]</p>	<p>To make the Local Plan legally compliant and sound, the following modifications are necessary:</p> <p>Community Engagement and Collaboration: Our community is eager to collaborate with landowners and the relevant authorities to design and deliver a replacement facility that reflects the actual needs of its users. This collaboration is essential for ensuring the facility is functional, inclusive, and adaptable to future growth. The plan should specifically outline mechanisms for ongoing consultation with the community to ensure compliance with the duty to cooperate.</p>	<p>Comment noted. The Duty to Cooperate is the obligation to engage on strategic matters with other Local Planning Authorities and prescribed bodies as part of the Localism Act 2011. The prescribed bodies are set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. The Duty to Cooperate does not require us to engage with local stakeholders, however this is still a requirement of the plan making process and part of our wider Council's commitment to ensuring residents can participate in our work. As such we have made wide ranging efforts to engage with local communities as part of the developing the Plan, as demonstrated in the Issues and Options, Regulation 18 and Regulation 19 Consultation Reports.</p>
Reg19-E-151	MD Masud Rana Bhuiyan		Reg19-E-151/01	General							No	No						No	<p>The Local Plan is not legally compliant and is unsound for several critical reasons:</p> <p>Our community is willing to work together with the landowners and relevant authorities to develop a new facility that meets our requirements. We believe that working together might produce a solution that all parties can agree upon.</p> <p>[originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward general]</p>		<p>Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh</p> <p>Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.</p>
Reg19-E-151	MD Masud Rana Bhuiyan		Reg19-E-151/03	General							No	No						No	<p>Duty to Cooperate: The draft plan does not sufficiently engage with local stakeholders, including our community. This failure to meaningfully collaborate demonstrates non-compliance with the duty to cooperate, which is a legal requirement. [originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward general]</p>	<p>To make the Local Plan legally compliant and sound, the following modifications are necessary:</p> <p>Community Engagement and Collaboration: Our community is eager to collaborate with landowners and the relevant authorities to design and deliver a replacement facility that reflects the actual needs of its users. This collaboration is essential for ensuring the facility is functional, inclusive, and adaptable to future growth. The plan should specifically outline mechanisms for ongoing consultation with the community to ensure compliance with the duty to cooperate.</p> <p>By implementing these modifications, the Local Plan will become both legally compliant and sound, ensuring it serves the needs of the community while fostering long-term growth and sustainability for the borough.</p>	<p>Comment noted. The Duty to Cooperate is the obligation to engage on strategic matters with other Local Planning Authorities and prescribed bodies as part of the Localism Act 2011. The prescribed bodies are set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. The Duty to Cooperate does not require us to engage with local stakeholders, however this is still a requirement of the plan making process and part of our wider Council's commitment to ensuring residents can participate in our work. As such we have made wide ranging efforts to engage with local communities as part of the developing the Plan, as demonstrated in the Issues and Options, Regulation 18 and Regulation 19 Consultation Reports.</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-156	John Saunders		Reg19-E-156/004	Building a Fairer Newham							Blank	Blank						Blank	<u>Community involvement in planning</u> Make planning committees more resident friendly and accessible with microphones and other inclusive accessories. Hold community meetings once or twice a year, for residents and other user to scrutinise progress and seek modifications when appropriate.		Comment noted. Thank you for this feedback which relates to resident engagement in all aspects of planning. The Planning Service sets out how residents can be involved in planning processes in a document called the Statement of Community Involvement, which can be found on our website. We review this regularly and will take your comments on board during the next review.
Reg19-E-157	Imtiaz Khankhara		Reg19-E-157/01	General							No	No						No	Local Plan Title : Abbey Mill N7 SA1 Failure to Co operate amd engage with land owner and members of the grassroot fauth communities who regularly, use this Land as only place of worship in Westham and Stratford and from with in Newham. [originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward general]		Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.
Reg19-E-157	Imtiaz Khankhara		Reg19-E-157/08a	General							No	No						No	The private landowners of the site are aspiring to redevelop the Abbey Mill N7 SA1 land site, and there has been no engagement to fullfill this private land use aspiration to be used by the local residents community of Newham... [originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward general]		Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh

General Comments to the full Regulation 19 Representations																					
Reg19-E-157	Imtiaz Khankhara		Reg19-E-157/12	General							No	No						No	<p>The private sector is meant to promote diversity and exercise the Equality Act, which I believe on merits it fails to meet equality assestment on the local plan draft proposal. Public sector equality requires public bodies to have due regard to the need, advance equality of the opportunity, and foster good relations between the community and people of all backgrounds when carrying out activities. I believe the local plan is impacting equality act 2010 and well being Act for myself and the wider community. Abbey Mill catchment enjoys 0 (zero) Muslim community social infrastructure, enjoined by other boroughs of the vibrant city of London. [originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward general]</p>	<p>Finally thee had been no bilingual literature available for hard to reach section of community.</p>	<p>Comment noted. The Local Plan is a strategy to manage development in the borough, and as such touches on many aspects of people’s day to day lives through their interaction with the built environment. By its nature, the Local Plan is a high level document which is broad in scope – addressing the application of standards, guidance and targets to deliver a range of physical infrastructure, social infrastructure, housing, employment, green space and other outcomes.</p> <p>In addition, the Local Plan is limited in what it can influence. It cannot address in detail the operation of buildings and spaces that it helps deliver and it cannot require changes to happen outside of planning processes or without the involvement of the landowner.</p> <p>These two factors mean that while a full EqIA is required for the Local Plan, this is necessarily high level both in the data it can use for the assessment and the potential outcomes it can identify. Planning Policy Officers have worked with the Council’s Inclusion Officers to adapt the corporate EQIA process in a meaningful and appropriate way for the Local Plan. A range of data sources have been used that include data on the specific needs and challenges of specific sections of the population, including from Newham's Population Surveys and the Census 2021. We believe our approach and the outcomes of the EQIA assessment are proportionate and effective for plan-making purposes.</p> <p>Further work has also been undertaken through the Community Facilities Needs Assessment, which provides further information relevant to the needs of faith groups in Newham, and has informed the policies of the Social Infrastructure chapter and the requirements to deliver community facilities within certain site allocations, including N7.SA1 Abbey Mills.</p> <p>In addition, in recognition of the policy flexibilities which are retained by applicants, the submission Local Plan includes policies in the Building a Fairer Newham chapter that require developers of larger sites to undertake further engagement (BFN2) and an assessment of Social Value and Health Impacts (BFN3) which will support applicants to consider how their scheme impacts Newham residents. These processes will be monitored through the Local Plan monitoring framework and provide learning towards the next Local Plan review and its EqIA. The Council is satisfied that this approach is proportionate and appropriate for the local plan process and meets the Council's duties under the Equalities Act.</p> <p>In relation to bilingual literature, we identified language barriers as a potential barrier to inclusion for residents. So we ensured that our promotional materials advertising each stage of the consultation included information about how to access the consultation in the most commonly spoken languages in Newham. Additionally, the online consultation software supported translation software,</p>

LB Newham Response																making the plan accessible in various languages using a readaloud functionality.				
																	Proposed modifications and explanation			
																		Representor Comment		
																			Complies with Duty to Cooperate?	
																			Consistent with the London Plan?	
																			Consistent with the NPPF?	
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Site allocation																				
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Comment Reference																				
Agent																				
Representor																				
Representation Reference																				

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

Reg19-E-164	Canning Town Development Company Ltd	DP9	Reg19-E-164/001	General														<p>Thank you for providing us with the opportunity to comment on London Borough of Newham (LBN) Draft Submission Local Plan (Regulation 19) as the as a part of the consultation ending on the 20th of September 2024. These representations are submitted by DP9 LTD ('DP9') behalf of our client Canning Town Development Company Ltd ('CTDC').</p> <p>The Site and Key Planning History</p> <p>CTDC has an ownership interest in 36 Shirley Street, Canning Town, London, E16 1EB ('the Site') and intends to bring forward the Site for comprehensive residential led re-development in the near future.</p> <p>A planning application (ref: 17/03903/FUL) was previously submitted in 2017 for the northern part of the site proposing 77 residential units (including 28.6% affordable) in buildings up to 10 storeys in height, including office floorspace and a dance school. LBN's Strategic Development Committee resolved to grant planning permission for the Proposed Development in October 2018, however, the application was reported back to LBN's Strategic Development Committee in September 2020 and refused as the S106 Agreement was not completed. It is important to note that these proposals were promoted by another party and that our client CTDC did not have any involvement in the planning application process.</p> <p>Following CTDC's recent proactive acquisition of the land, the Site has been subject to pre-application discussions with planning and design officers at LBN (ref. 24/00637/PREAPP) since March 2024. The Proposed Development consists of the comprehensive re-development of the Site to provide circa 180 residential units (Use Class C3) 35% of which would be affordable in line with a 60/40% split in favour of social housing.</p> <p>So far, the following meetings have taken place in relation to residential-led scheme designed by Metropolitan Workshop:</p> <ul style="list-style-type: none">• Two pre-application meetings on the 29th of April and the 3rd of September 2024 respectively; and• A Design Review Panel (DRP) session which was held on the 5th of September 2024. <p>CTDC is targeting the submission of a formal planning application in December 2024/January 2025.</p> <p>These representations are submitted in the context of the Site and the Proposed Development that is subject to the above on-going pre-application discussions. A copy of the most recent pre-application presentation material is provided at Appendix 1 for convenience. [No appendix was submitted]</p>	Comment noted.
Reg19-E-164	Canning Town Development Company Ltd	DP9	Reg19-E-164/002	General														<p>The Development Plan</p> <p>The Development Plan for the Site comprises the following:</p> <ul style="list-style-type: none">• The adopted London Plan (2021); and• The adopted LBN Local Plan (2018). <p>Within the adopted Local Plan, the Site is 'white land' and is not part of any of the allocated Strategic Sites.</p>	Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																			<p>However, the Site is located within the Royal Docks and Beckton Riverside Opportunity Area (OPA), Canning Town District Centre and the Canning Town Tall Buildings Area.</p> <p>Whilst the Site is not in a Conservation Area and does not contain any listed buildings, the Grade II Listed Church of St Luke is located just under 100m from the Site.</p> <p>The Site has a PTAL rating of 4 and is located approximately 400m south of Canning Town High Street and 300mm south of Canning Town transport interchange.</p> <p>NPPF</p> <p>Paragraph 15 of the NPPF is clear that “the planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings”.</p> <p>Paragraph 16 sets out a number of requirements for the scope of a new Local Plan as set out below:</p> <p>“a) be prepared with the objective of contributing to the achievement of sustainable development;</p> <p>b) be prepared positively, in a way that is aspirational but deliverable;</p> <p>c) be shaped by early, proportionate and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;</p> <p>d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;</p> <p>e) be accessible through the use of digital tools to assist public involvement and policy presentation; and</p> <p>f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).”</p> <p>Paragraph 35 of the NPPF is clear that a Local Plan must be ‘Sound’, the definition of which comprises, being:</p> <p>CTDC’s representations in response to the Regulation 19 draft are set out below, and we request these are given proper consideration prior to adoption.</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-164	Canning Town Development Company Ltd	DP9	Reg19-E-164/003	General															General Representations We support the need for a new Local Plan to address emerging challenges and opportunities that LBN is currently experiencing. The introduction of clear, evidence-based planning policies is welcomed, provided that the Local Plan is soundly based and fully consistent with planning policy at a national and regional level. Discussions with the GLA will also be important, mindful of the anticipated London Plan review that will start in 2024 and therefore run alongside LBN’s draft Local Plan. Reforms to national policy and legislation will also run in tandem and will need monitoring to ensure evolving policy responds positively. We support the scale of growth sought in the borough to be matched by high quality design – following the London Plan ‘design led’ approach (Policy D1 and D3). Ensuring developments optimise sites and respond to existing context is important in terms of supporting the delivery of wider strategic objectives of the draft plan, particularly the need to deliver new homes to address the housing crisis at a national and local level.		Comment noted.
Reg19-E-164	Canning Town Development Company Ltd	DP9	Reg19-E-164/009	General															Conclusion We trust that the above representations are clear and that they will be fully considered prior to the next round of consultation/adoption. If you require any additional information, or would like to discuss this matter further, then please do not hesitate to contact Harri Aston or Chris Gascoigne at this office.		Comment noted.
Reg19-E-166	Natural England		Reg19-E-166/001	General															<u>Draft Submission Newham Local Plan – Regulation 19</u> Thank you for your consultation on the Newham Local Plan on the 19th of July 2024. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.		Comment noted.

[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
																			polices and cite concerns on how they meet the tests of soundness. 1. Site Allocation N2.SA4 ‘Land at Thameside West and Carlsberg Tetley Dock’ 2. Policy D4 ‘Tall Buildings’ 3. Policy J1 ‘Employment and Growth’ 4. Policy H3 ‘Affordable Housing’ 5. Policy H4 ‘Unit Size Mix’ Recommendations are provided to remedy the shortcomings of the Local Plan prior to submission for examination		
Reg19-E-169	Silvertown Homes Ltd	DP9	Reg19-E-169/014	General															We trust that SHL’s representations will be considered by LBN before the Local Plan is finalised and submitted for examination. Should you have any questions please contact contact details redacted or contact details redacted of this office.		Comment noted.
Reg19-E-170	Berkeley Homes (South East London) Limited	Savills	Reg19-E-170/001	General							No	No						Blank	1. INTRODUCTION Thank you for consulting us on Newham’s Local Plan: Draft Submission Local Plan (Regulation 19), (hereafter ‘DSL’P’) We write on behalf of our client, Berkeley Homes (South East London) Limited (hereafter ‘Berkeley Homes’). Berkeley Homes commend the Borough progressing a new Local Plan in an effort to replace the outof-date Newham Local Plan (2018). Notwithstanding, Berkeley have a number of reservations around the DSLP and considers that, as in part currently drafted, is not positively prepared or consistent with national or regional policy. As a landowner within the Borough, Berkeley Homes welcomes the opportunity to be involved in shaping the future of the London Borough of Newham (hereafter ‘LBN’) via the Regulation 19 consultation. This representation is submitted by Savills (UK) Limited (hereafter ‘Savills’) in response to the consultation.		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-170	Berkeley Homes (South East London) Limited	Savills	Reg19-E-170/003	General							Blank	Blank						Blank	<p>[1. INTRODUCTION]</p> <p>Berkeley Homes support the preparation of a New Local Plan for the Borough and wishes to emphasise the Site’s potential to deliver a significant number of planning and public benefits. These benefits will be delivered through the Site’s allocation for high-density mixed-use development, which enables the reuse of a brownfield site in a highly sustainable location, in accordance with national and regional policy.</p> <p>This letter has been drafted further to Berkeley Homes’ previous Regulation 18 Representations on the DSLP (dated 20th February 2023), where suggested amendments regarding to the DSLP were raised. Berkeley Homes notes that a number of their amendments have not been addressed in the preparation of the DSLP.</p>		Comment noted.
Reg19-E-170	Berkeley Homes (South East London) Limited	Savills	Reg19-E-170/005	General							Blank	Blank						Blank	<p>[1. INTRODUCTION]</p> <p>Berkeley Homes would welcome the opportunity to discuss the below representations with Officers in the coming months and further assist in the plan-making process going forward and to discuss the Site’s potential to contribute towards the Borough’s objectives by making the best use of this highly sustainable site that can contribute towards the growth of the Borough as a whole.</p> <p>For the avoidance of doubt, Berkeley Homes will retain their right to submit hearing statements and speak at the forthcoming Examination in Public and they look forward to collaboratively engaging with LBN through the plan-making process, emphasising their commitment to partnership and open dialogue.</p>		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-170	Berkeley Homes (South East London) Limited	Savills	Reg19-E-170/006	General							Blank	Blank							<p>Background – Berkeley Homes (South East London) Limited</p> <p>Berkeley Homes has a proven track record for delivering sustainable and inclusive mixed use regeneration projects across London and the South East and have a reputation for delivering high quality homes and associated uses. They work with key stakeholders to tackle the shortage of good quality homes and make a lasting and sustainable contribution to the landscape and communities that they create.</p> <p>Berkeley Homes has a wealth of experience in delivering large scale, complex developments that include homes, workplaces, schools, community facilities, large area of public realm and new transport infrastructure.</p> <p>Our schemes are characterised by exemplary and sustainable design that take into account future climate change, that facilitates the creation of strong, inclusive communities, and that promote a net biodiversity gain.</p>		Comment noted.

Reg19-E-170	Berkeley Homes (South East London) Limited	Savills	Reg19-E-170/009	General							No	No						Blank	<p>2. LEGISLATIVE FRAMEWORK</p> <p>The Planning and Compulsory Purchase Act 2004 is the primary legislative act that provides the basis for the plan-led system in England. It is supported by other legislative instruments, including the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), which provide further details on the process for the Council to prepare and adopt the Local Plan and other supporting documents.</p> <p>National Policy Context</p> <p>Paragraph 35 of the National Plan Policy Framework (‘NPPF’, September 2023) states that for an emerging Local Plan to be found ‘sound’, it must satisfy the below four criteria:</p> <ul style="list-style-type: none">▪ Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;▪ Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;▪ Effective – deliverable over the Plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and▪ Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant. <p>In London, Local Plans are also required to be in ‘general conformity’ with the London Plan.</p> <p>It is Berkeley Homes’ view that the DSLP has not been positively prepared as it fails to meet objectively assessed needs. It is not effective as it places too much of a financial burden on development. It is not consistent with national policy as it will fail to meet its objectified need for homes.</p> <p>The comments of Berkeley Homes in respect of this Regulation 19 DSLP are set out below. It is hoped that the Council find these of use in their ongoing preparation of the draft.</p>		Comment noted.
Reg19-E-170	Berkeley Homes (South East London) Limited	Savills	Reg19-E-170/010	General							Blank	Blank						Blank	<p>3. MAIN REPRESENTATION</p> <p>The following sections set out our comments on each in turn.</p> <p><i>Suggested amendments to draft Local Plan re: [reference inserted]</i></p> <p>Deletions shown as strikethrough text in red; and</p>		Comment noted. Please note a different notation has been used in this consultation table for consistency across all comments.

LB Newham Response	
Proposed modifications and explanation	
Representor Comment	Additions shown as underlined text in green.
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	

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-170	Berkeley Homes (South East London) Limited	Savills	Reg19-E-170/040	General							No	No						Blank	<p>3. Conclusion</p> <p>The overriding response is that the Local Plan should not put in place policies that fetter development opportunities from being brought forward or that mean those tasked with major development investment decisions must operate at the margins of viability. Following recent experience, rapid economic changes such as the COVID-19 pandemic, ongoing conflict in Ukraine, increases in interest rates, and market uncertainty can have a significant and long-lasting market impact. It is therefore important that policies are therefore resilient, and that underlying viability evidence supports this. The importance of flexibility is reinforced when taking account of the many changes regularly taking place in the development industry, not only related to the recent global pandemic, but also in respect of the building regulatory system and substantial cost inflation and market uncertainty. For a plan that operates over several years and whose next review may not take place for some time, it is important to consider the likely impacts now to avoid unnecessary challenges in future years through flexibility. Taking the above into account, it is our conclusion that the DSLP would not be considered ‘sound’ in accordance with Paragraph 35 of the National Planning Policy Framework (NPPF) given it is not positively prepared, effective, justified, or consistent with the London Plan.</p> <p>Some of the items noted above in their current form would constrain potential redevelopment options and would therefore, not be effective in their delivery and would not be consistent with national policy, notably the restriction of tall building heights and affordable housing requirements. Therefore, it is considered that in its current format the draft Local Plan is considered not sound.</p> <p>We welcome the opportunity to comment on the draft Plan and look forward to future opportunities to engage with the Council. If you have any queries or would like to discuss anything further, please do contact me on the details above.</p>		Comment noted.

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Reg19-E-173	L&Q		Reg19-E-173/001	General															About L&Q L&Q is one of the UK’s leading housing associations and one of the nation’s largest residential developers. We own or manage over 105,000 homes across London and the South East across a range of tenures including market sale, private rent, and affordable housing.		Comment noted.
Reg19-E-173	L&Q		Reg19-E-173/002	General															L&Q in Newham L&Q is a major investor and provider of homes in Newham. Across the Borough L&Q owns and manages 9,984 homes. As a charitable organisation, our role goes beyond providing homes and housing services - we are a long-term partner in the neighbourhoods where we operate. Through the L&Q Foundation Place Makers Fund, we have funded projects within the borough working with Orange Bow Community Interest Company, Future Molds Communities, the Kids Network and Face Front Inclusive Theatre, with grants totalling £75,000. The Learning to Succeed Programme (LTS) is an ‘award winning’ schools partnership programme delivering wellbeing, Careers and STEM sessions to secondary school aged students. We have delivered sessions to three schools in Newham, Eastlea, London Design and Harris Academy Chobham.		Comment noted.
Reg19-E-173	L&Q		Reg19-E-173/003	General															We are owners and managers of our developments, and Newham is a key borough for the future delivery of new homes. Notably, we hold a new development opportunity at Lyle Park West (within draft site allocation N2.SA2) and are also exploring the potential for estate regeneration opportunities where this would be appropriate. We therefore have a long-term interest in ensuring that LBN’s Local Plan is successful. It is on this basis that we welcome the opportunity to submit representations.		Comment noted.
Reg19-E-173	L&Q		Reg19-E-173/004	General															Overview of Representations L&Q submitted representations to the previous draft version of the Local Plan in our letter dated 20 th February 2023 and welcomes the opportunity to provide further feedback to ensure a clear and robust planning framework for the Borough. In our Regulation 18 representations we set out our overall support for the vision for the borough set out in the draft Local Plan, but highlighted some specific areas where we considered that amendments were required to make the policies more practical and effective.		Comment noted.

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Reg19-E-173	L&Q		Reg19-E-173/005	General															Having reviewed the amended draft Regulation 19 Local Plan, we do retain concern regarding the practicality and effectiveness of some of the specific development management policies, principally in relation to matters which have the potential to impact on scheme viability. In particular, concern is raised in respect of the following policies: <ul style="list-style-type: none">• BNF2• D1• H3• H4• J4 We also raise significant concern regarding draft allocation N2.SA2 which covers L&Qs site at Lyle Park West, as well as Policy D4 (and specifically TBZ11) which sets out the associated tall buildings heights for this area.		Comment noted.
Reg19-E-173	L&Q		Reg19-E-173/007	General															The detailed comments are appended to this letter (Appendix 1) using the completed LBN representation forms. These representations are made in the context of Paragraph 35 of the National Planning Policy Framework, to be 'sound', policies must be positively prepared, justified, effective and consistent with national policy.		Comment noted.
Reg19-E-173	L&Q		Reg19-E-173/008	General															Future Participation As a key stakeholder, L&Q welcome the opportunity to contribute to emerging planning policy. We are supportive of LBN's intention to set out its vision for the borough set out in the draft Local Plan, however we do have concerns around the practicalities of draft allocation N2.SA2 and some of the draft policies and the impact on the viability of development proposals and therefore investment in the borough. The amendments we have proposed seek to ensure the document is more practical and effective in supporting growth in the borough. We look forward to confirmation of receipt of these representations and reserve our right to participate in relevant hearing sessions at examination stage.		Comment noted.
Reg19-E-173	L&Q		Reg19-E-173/033	Design	D4 Tall buildings			TBZ1 1: Lyle Park Wes				No							L&Q is a major investor and provider of homes in Newham, and notably, we hold new development opportunity at Lyle Park West (within TBZ11). For the reasons set out in the form, we have significant concerns with the soundness of the draft allocation which warrant discussion.		Comment noted.

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Reg19-E-175	Ibrahim Waza		Reg19-E-175/001	General							No	No						No	The current Local Plan is fundamentally flawed and does not fulfill the duty to cooperate,		Comment noted. The Duty to Cooperate is the obligation to engage on strategic matters with other Local Planning Authorities and prescribed bodies as part of the Localism Act 2011. The prescribed bodies are set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. The Council considers that we have fulfilled this requirement and our approach is set out in our Duty to Cooperate Report which is published on the Council's website.
Reg19-E-176	Port of London Authority	Capita	Reg19-E-176/001	General							Blank	Blank						Blank	<p>Port of London Authority Response to the Newham Regulation 19 Draft Submission Local Plan Consultation</p> <p>Thank you for consulting the Port of London Authority (PLA) on the Regulation 19 Local Plan consultation for the London Borough of Newham, which sets out how the borough will shape, plan and manage growth, regeneration and development across the borough to 2038. We would like to recognise the response to our comments provided to the Regulation 18 Local Plan consultation as set out in the Consultation Report and incorporated in the latest Reg 19 draft Plan. There are however a few points that we would like to reiterate in addition to some further comments on the latest consultation document as set out below.</p>		Comment noted.
Reg19-E-176	Port of London Authority	Capita	Reg19-E-176/017	General							Blank	Blank						Blank	I hope you find these comments helpful as you progress the Local Plan. Should you have any queries, please don't hesitate to contact us.		Comment noted.
Reg19-E-177	City of London	Montagu Evans	Reg19-E-177/001	General															Please refer to covering letter submitted alongside this submission which outlines our concerns with the Local Plan as currently drafted in respect of West Ham Park Nursery and the reasons as to why we would like the opportunity to speak at the hearing sessions.		Comment noted.

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Reg19-E-177	City of London	Montagu Evans	Reg19-E-177/002	General															We write on behalf of our client, City of London Corporation (“CoL”), to make representations in respect of the Regulation 19 (“Reg 19”) consultation on the Draft Newham Local Plan. These representations to the London Borough of Newham (“LB Newham” / “the Council”) relate to the former Nursery (“the Site”) adjacent to West Ham Park (“Park”), which is owned by our client. The purpose of the consultation is to establish if the Local Plan meets the legal and procedural requirements for planmaking as set out by Paragraph 35 (Examining Plans) of the National Planning Policy Framework (“NPPF”) (December 2023) and whether the Local Plan can be found sound. These representations are intended to help guide the formulation of Newham’s Local Plan. The Draft Newham Local Plan dated June 2024 spans a plan period from 2023 to 2038 (covering 15 years).		Comment noted.
Reg19-E-177	City of London	Montagu Evans	Reg19-E-177/006	General															Below we set out our representations in response to the Draft Newham Local Plan. CONSIDERATION OF REGULATION 19 DRAFT LOCAL PLAN We remind the Council of the expectations of national policy for plan-making. NPPF Paragraph 35 makes clear that Local Plans must meets the following four tests of soundness: 1) Positively Prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development; 2) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; 3) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and 4) Consistent with National Policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.		Comment noted.

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Reg19-E-177	City of London	Montagu Evans	Reg19-E-177/030	General															GREATER LONDON AUTHORITY ‘CALL FOR SITES’ We note the Greater London Authority has now launched its ‘Call for Sites’, running until 30th October 2024. It is our Client’s intention to submit the Site as part of the this process for formal consideration as a residential development site.		Comment noted.
Reg19-E-177	City of London	Montagu Evans	Reg19-E-177/035	General															We respectfully request that we are kept up to date with the emerging Local Plan. Additionally, we reserve our position to appear at the Examination in Public (“EiP”) Hearing Sessions. We would welcome the opportunity to meet with officers to discuss the future of the site and to facilitate a site visit. Please do not hesitate in contacting (Contact details redacted), (contact details redacted) or (contact details redacted) of this office in the first instance.		Comment noted.
Reg19-E-178	Royal Docks		Reg19-E-178/001	General							Blank	Blank						Blank	I’m pleased to be able to provide comments and suggestions on the Council’s Regulation 19 draft of the new Local Plan (the Plan) for Newham. The work of the Royal Docks Team (RDT), including our work on GLA Land and Property Limited (GLAP) sites is aligned with the corporate priorities of the Council as set out in the jointly agreed Royal Docks Delivery Plan.		Comment noted.
Reg19-E-178	Royal Docks		Reg19-E-178/009	General							Blank	Blank						Blank	We are aware of the representations submitted directly relating to Silvertown Quays, Thameside West and Excel and can confirm that we endorse the suggestions therein. We’re happy to have more detailed discussions about how we can support further iterations of the Plan and how its implemented.		Comment noted.
Reg19-E-179	AIM Land Ltd	Rolfe Judd	Reg19-E-179/007	General															P09239 - 970 Romford Road, Ilford, E12 5LP Representations to London Borough of Newham’s Draft Local Plan Review; Submission Version (Regulation 19) Consultation (September 2024) We write on behalf of our client, AIM Land Ltd, to make representations on the London Borough of Newham’s Draft Local Plan Review (Reg 19 version) which is currently out for consultation. These representations are written with specific reference to the following site: - 970 Romford Road, Ilford, E12 5LP		Comment noted.

Reg19-E-179	AIM Land Ltd	Rolfe Judd	Reg19-E-179/010	General															<p>We have made individual comments on the specific policies using the Council’s online response form, however, given the scope of the comments we also set out our principal representations below.</p> <p>The Site</p> <p>The site is situated along Romford Road and just outside Ilford Metropolitan Town Centre. The application site currently accommodates a The Gym Group London (Class E), hard standing surface level car parking, and Enterprise car hire agency (sui generis). The site was designated as a Local Industrial Location (LIL) in the 2018 Local Plan.</p> <p>A portion of the application site contains a Gas Pressure Reduction System (PRS) on land in the ownership of National Grid alongside multiple other utilities below the site and above-ground electricity pylons along the site’s eastern boundary.</p> <p>There is an Adjoining site to the rear (also within our client’s ownership) of Approx. 0.48 ha which is currently used as a Storage Facility. This Adjoining site has Outline Planning Consent (LP Ref. 19/03343/OUT) for a 13,674sqm Storage Warehouse. To the west of the site is a 3-12 storey post-war housing development, and to the east is Ilford Town Centre, which includes several tall residential towers in excess of 35m in height.</p> <p>The site has excellent access to public transport services with PTAL rating of 6a. Ilford Station is located within 0.5 kilometres with regular service to Liverpool Street and in addition, a number of bus services run along Romford Road.</p> <p>The site benefits from easy links with local facilities and shops, which provide a wide range of retail opportunities for the site to incorporate as part of the development. Of particular note is the Sainsbury’s superstore situated approximately 400m walking distance to the east.</p> <p>The site is not located within or adjacent to a Conservation Area or Nature Conservation Area, however the southern end of the site is located adjacent to Metropolitan Open Land (MOL). The site does not contain any listed buildings and is not located in a Flood Zone.</p> <p>[Image inserted - Aerial Photograph – Site Boundary and Adjoining site]</p> <p>Proposed Areas for Review</p> <p>A number of key changes are sought to the Draft Local Plan Review which impact our client’s site at 970 Romford Road, Ilford. These changes are summarised below:</p> <ul style="list-style-type: none">• Local Industrial Location (LIL) Designation (Draft Policy J1 and J2)• Tall Buildings (Draft Policy D4); <p>Each of these matters are addressed in more detail in the following sections.</p>	Comment noted.
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Reg19-E-179	AIM Land Ltd	Rolfe Judd	Reg19-E-179/023	General															<p>We would welcome the opportunity to meet with the Newham Policy Team to review the matters raised above and collectively work towards the formulation of a positive planning policy framework. We plan to arrange a pre-application meeting to discuss opportunities for the site to provide a viable alternative use on site.</p> <p>We trust the above will be taken into consideration during the Consultations. Should you have any questions, please do not hesitate to contact the undersigned.</p>		Comment noted.
Reg19-E-180	PEACH: The People's Empowerment Alliance for Custom House		Reg19-E-180/001	General							Blank	Blank						Blank	<p>Dear Newham Council,</p> <p>We are a collective of housing organisation and community groups in Newham. We are on the frontlines of witnessing the struggles caused by Newham's housing emergency. Therefore we believe we are in prime place to reflect our communities' needs and concerns with housing, land and planning in the borough. We have reviewed the draft local plan and detailed our comments and concerns below related to particular policies.</p>		Comment noted.
Reg19-E-181	LAMIT c/ CCLA Investment Management Ltd	Rolfe Judd Planning	Reg19-E-181/001	General							Blank	Blank						Blank	<p>Rolfe Judd Planning have been appointed by LAMIT c/ CCLA Investment Management Ltd to advise on planning matters relating to their property at Beckton Retail Park. We understand that LB Newham are currently undertaking a Regulation 19 consultation on the Draft Submission Local Plan until Friday 20th September 2024 and we are writing to submit the following comments on behalf of our client.</p>		Comment noted.
Reg19-E-181	LAMIT c/ CCLA Investment Management Ltd	Rolfe Judd Planning	Reg19-E-181/030	General							Blank	Blank						Blank	<p>[Conclusions] We look forward to participating in future Local Plan consultations prior to adoption.</p>		Comment noted.

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Reg19-E-183	ExCel and Mount Anvil	DP9	Reg19-E-183/01	General															<p>On behalf of our clients London International Exhibition Centre Plc (ExCeL) and Mount Anvil, we are writing to set out our consultation response regarding the London Borough of Newham Draft Submission Local Plan (Regulation 19).</p> <p>In particular these representations focus on Site Allocation N2.SA5 'Excel Western Entrance', the majority of which falls within the long leasehold ownership of London International Exhibition Centre Plc. In addition, as freeholder for the site, the GLA (through the Royal Docks team) have been involved in the vision and feasibility work and are supportive of our emerging proposals, including the reconfiguration of open space at Royal Victoria Square, and the comments in these representations.</p> <p>This letter follows our previous representations at 'Call for Sites' stage in December 2021 and more recently our letter dated 30th May 2024 referring to the Reg 18 Local Plan and subsequent preapplication discussions regarding the development potential of the Site.</p> <p>In addition, this letter proposes to remove ExCeL's ownership from the boundary of Site Allocation N3.SA1 'Royal Albert Dock' and also endorses the GLA's separate representations regarding Policy GWS2 'Water Spaces'.</p>		Comment noted.
Reg19-E-183	ExCel and Mount Anvil	DP9	Reg19-E-183/20	General															<p>We trust that these comments are helpful and will be accommodated in the Local Plan. We look forward to working collaboratively the Council to unlock the potential of the site.</p>		Comment noted.

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

Reg19-E-184	Primark Stores Ltd	CBRE	Reg19-E-184/001	General														<p>Introduction</p> <p>CBRE act for Primark Stores Ltd ('Primark), who are owners of the Primark site in East Ham.</p> <p>The East Ham neighbourhood is located in the east of the borough. It is bounded by Woodgrange Park Cemetery and the railway line to the north and the North Circular Road to the east. The railway line that runs east to west and High Street North which runs north to south cut across the neighbourhood.</p> <p>Barking Road runs east to west in the south of the neighbourhood, intersecting with High Street North and High Street South. The neighbourhood is predominantly residential in character, consisting of terraced housing along gridded streets. East Ham is a Major Town Centre and is the third largest town centre in Newham. The East Ham Major Centre runs north to south along High Street North and eastwards from the junction with Barking Road. The major centre provides well known national retail chains along with a market and independent and specialised shops and food and drink offer. It also has a strong representation of financial and business services but there remains an extremely high number of betting shops and hot food takeaways.</p> <p>High Street North provides a local retail offer as does Katherine Road. The neighbourhood has 43 community facilities, including a number of civic buildings, higher education facilities, community centres and 28 places of worship. The neighbourhood's provision of community facilities is above the Newham average number of community facilities per km2.</p> <p>The East Ham Primark site is located towards the southern end of High Street North, on the corner with Pilgrims Way. The 'L-shaped' site (0.5 ha) extends to northwards alongside the Ron Leighton Way car park, with a three-storey terrace of buildings to the east, consisting of commercial units to ground floor and mixed uses on upper floors. The area is generally low-rise and residential in nature, but includes High Street North and other parts of the East Ham Town Centre, with a number of tall buildings extending up to 15-storeys in the immediate vicinity.</p> <p>The East Ham Primark store consists of a large two-storey retail unit fronting onto High Street North, wrapping along Pilgrims Way, with ancillary storage and servicing off Ron Leighton Way. The site address is 51 High Street North, London, E6 1HZ (the 'Site').</p>	Comment noted.
Reg19-E-184	Primark Stores Ltd		Reg19-E-184/014	General						Yes	Yes						Yes	<p>General Comments</p> <p>Overall, Primark support LBN's vision and objectives for the Borough, and the transformation of the East Ham neighbourhood. However, it is requested that as described above, sufficient flexibility and amendments are introduced into Policy D4 (Tall buildings) and the East Ham Primark site allocation (N13.SA2).</p> <p>Primark would welcome continued</p>	Comment noted.

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																			engagement on the emerging new Local Plan and continue to engage positively with LBN on their vision for the East Ham neighbourhood, and East Ham Primark site.		
Reg19-E-185	Hadley Property Group	Deloitte	Reg19-E-185/001	General															<i>Representations on behalf of Hadley DM Services Ltd and Hadley Stratford Development Ltd</i> Deloitte is instructed by Hadley DM Service Ltd and Hadley Stratford Development Ltd ('Hadley') to submit representations on the Newham Local Plan Review in respect of International Quarter London North ('IQLN') and Rick Roberts Way ('RRW') in Stratford. Through the forthcoming development of these sites, Hadley has an active interest in the formulation of planning policy at the London Borough of Newham ('LBN') and welcomes the opportunity to respond to the Draft Submission Local Plan ('DSLPL') through this Regulation 19 consultation. <i>Previous Response to the Regulation 18 Draft Plan</i> On behalf of Hadley, Deloitte submitted representations in response to the LBN Regulation 18 Draft Local Plan in February 2023. As a result, Hadley would like to continue engaging with LBN to contribute to positive and effective changes in response to this consultation. <i>Regulation 19 Draft Submission Local Plan</i> Following the Regulation 18 consultation, Hadley notes that there have been a number of positive amendments to the policy wording in the DSLP. However, concerns remain regarding the lack of consistency with the adopted LLDC Local Plan and site allocations.		Comment noted.
Reg19-E-185	Hadley Property Group	Deloitte	Reg19-E-185/048	General															Conclusion In summary, Hadley broadly supports the vision of the Local Plan to deliver a fairer Newham. However, Hadley continues to be concerned by the restrictive requirements set by policies and inconsistencies with existing site allocations as set out in this letter. Hadley is keen to continue to discuss the DSLP with policy officers and requests to be informed on the progress of the document.		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-187	Aamina Hafeji		Reg19-E-187/001	General							No	No						No	The Local Plan as it currently stands is fundamentally unsound and fails to comply with the duty to co-operate		Comment noted. The Duty to Cooperate is the obligation to engage on strategic matters with other Local Planning Authorities and prescribed bodies as part of the Localism Act 2011. The prescribed bodies are set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. The Council considers that we have fulfilled this requirement and our approach is set out in our Duty to Cooperate Report which is published on the Council's website.
Reg19-E-189	London Square Ltd	DP9	Reg19-E-189/001	General							Yes	No						Yes	London Borough of Newham Draft Submission Local Plan (Regulation 19) Thank you for providing us with the opportunity to comment on London Borough of Newham (LBN) Draft Submission Local Plan (Regulation 19) as a part of the consultation ending on the 20th of September 2024. These representations are submitted by DP9 Ltd ('DP9') behalf of our client London Square ('LSQ').		Comment noted.
Reg19-E-189	London Square Ltd	DP9	Reg19-E-189/002	General							Yes	No						Yes	The Site and Key Planning History LSQ has an ownership interest in Vulcan Wharf, Cooks Road, Stratford, London, E15 2PW ('the Site'). The Site covers an area of 1.34 ha site and located in Pudding Mill, Stratford. On 31st December 2021, the LLDC granted full planning permission (ref: 20/00307/FUL) for the demolition of the existing buildings and redevelopment of the Site to provide buildings between two and 14 storeys in height to include 457 residential units (Use Class C3), 5,594sqm (GEA) of storage and distribution floorspace (Use Class B8), 3,494sqm (GEA) of light industrial floorspace (Use Class B1c) and 180sqm (GEA) of retail floorspace (Use Classes A1/A2/A3), with car and cycle parking and associated hard and soft landscaping (the 'Consented Development'). These representations are submitted in the context of the Site and the Consented Development, that was implemented in June 2022 following the demolition of the buildings that existed on the Site.		Comment noted.

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

Reg19-E-189	London Square Ltd	DP9	Reg19-E-189/003	General																Yes	No										Yes	<p>The Development Plan</p> <p>The Development Plan for the Site comprises the following:</p> <ul style="list-style-type: none">•The adopted London Plan (2021); and•The adopted LLDC Local Plan (2020). <p>The Site falls within the Pudding Mill area, which is currently within the London Legacy Development Corporation (LLDC) boundary within the LBN, noting that the LLDC will hand, planning decision making powers back to LBN in December 2024. Within the adopted LLDC Local Plan, the Site is identified as an ‘Other Industrial Location’ (OIL) and forms part of Site Allocation SA4.3: Pudding Mill. The Site is covered by the Pudding Mill SPD where SA4.3 aspires to be a “new medium-density, mixed-use area”.</p> <p>National Planning Policy Framework (NPPF)</p> <p>Paragraph 15 of the NPPF states: “the planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings”.</p> <p>Paragraph 16 of the NPPF sets out a number of requirements for the scope of a new Local Plan as set out below:</p> <p>a) “ be prepared with the objective of contributing to the achievement of sustainable development;</p> <p>b) be prepared positively, in a way that is aspirational but deliverable;</p> <p>c) be shaped by early, proportionate and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;</p> <p>d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;</p> <p>e) be accessible through the use of digital tools to assist public involvement and policy presentation; and</p> <p>f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).”</p> <p>Paragraph 35 of the NPPF is clear that a Local Plan must be ‘Sound’, which must be, positively prepared, justified, effective and consistent with national policy.</p> <p>LSQ’s representations in response to the Regulation 19 draft are set out below, and we request these are given proper consideration prior to adoption.</p>		Comment noted.
Reg19-E-189	London Square Ltd	DP9	Reg19-E-189/004	General																Yes	No										Yes	<p>General Representations</p> <p>We support the need for a new Local Plan to address emerging challenges and opportunities that LBN is currently experiencing. The introduction of clear, evidence-based planning policies is welcomed, provided that the Local Plan is soundly based and fully consistent with planning policy at a national and regional</p>		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																			level. The draft Local Plan is due to be adopted in Summer 2025. As such, discussions with the GLA will also be important, mindful of the anticipated London Plan review that will start in 2024 and therefore run 3 alongside LBN’s draft Local Plan. Reforms to national policy and legislation will also run in tandem and will need monitoring to ensure evolving policy responds positively. We support the scale of growth sought in the borough to be matched by high quality design – following the London Plan ‘design led’ approach (Policy D1 and D3). Ensuring developments optimise sites and respond to existing context is important in terms of supporting the delivery of wider strategic objectives of the draft plan, particularly the need to deliver new homes to address the housing crisis at a national and local level.		
Reg19-E-189	London Square Ltd	DP9	Reg19-E-189/009	Homes	H3 Affordable housing						Yes	No						Yes	Conclusion We trust that the above representations are clear and that they will be fully considered prior to the next round of consultation/adoption. If you require any additional information, or would like to discuss this matter further, then please do not hesitate to contact [redacted] at this office.		Comment noted.
Reg19-E-190	Manor Park Business Association		Reg19-E-190/001	General															Thank you for forwarding the details of the Draft Plan for Newham.		Comment noted.
Reg19-E-190	Manor Park Business Association		Reg19-E-190/007	General															Thanking you in advance for taking on board our comments and thoughts. Please do email the update of the consultation and ongoing developments. If you require any further information, please do be in touch.		Comment noted.

Reg19-E-191	University College London	Deloitte	Reg19-E-191/001	General														<p>On behalf of our client, University College London (UCL), we write in response to the London Borough of Newham (LBN) Draft Local Plan Regulation 19 consultation. UCL welcomes the opportunity to provide comments on the content of the draft policies.</p> <p>UCL is London’s leading multidisciplinary university, with 16,000 staff and 50,000 students. UCL provides excellence and leadership in teaching and research, was ranked eighth in the QS World University Rankings 2024 and is among the top 10 universities ranked by The Guardian. UCL competes on a global stage with other top-rank universities overseas (such as Harvard, Yale and Stanford) and in the UK (such as Oxford, Cambridge and Imperial College). In order to attract the best graduate researchers and academic staff, and the brightest undergraduates, it is essential to be able to offer world class facilities and a high-quality learning environment.</p> <p>UCL East</p> <p>As part of a world-class cultural and education destination within the Queen Elizabeth Olympic Park (QEOP), UCL is working to establish a new university campus, UCL East. UCL East is considered a new model for how a university campus can be embedded in the local community, providing world-leading research, education, entrepreneurship and innovation. UCL East is the largest single expansion of UCL’s estate since its foundation in 1826. Phase 1 of the campus comprises Marshgate Plot 1, predominantly academic spaces, and One Pool Street, forming the first on-site student accommodation. Together, these provide 50,000 sqm of floorspace, including 524 student accommodation rooms in One Pool Street.</p> <p>The provision of world class teaching and research space and student accommodation are regarded as essential components of UCL’s ability to attract high quality students and staff, both from the UK and abroad. Student choices are increasingly driven by the wider ‘student experience’ of which the provision of high-quality learning and living accommodation is considered a key aspect.</p> <p>An Outline Planning Application for the UCL East campus was approved by the LLDC Planning Policy and Decisions Team (PPDT) on 03 May 2018 (LLDC ref. 17/00235/OUT). The Outline Consent comprises a comprehensive, phased, mixed use development within QEOP to include academic and commercial space, student accommodation, supporting retail, and landscaping to include new accesses and car and cycle parking.</p> <p>Applications for the Approval of Reserved Matters (RMAs) were later approved with regard to Marshgate Plot 1 (LLDC ref. 18/00424/REM), One Pool Street (formerly Pool Street West) (LLDC ref. 18/00425/REM) and Phase 1 Public Realm (LLDC ref. 18/00426/REM) on 29 March 2019. These RMA applications comprise Phase 1 of the development. One Pool</p>	Comment noted.
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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>Street was occupied in Autumn 2022. Marshgate Plot 1, which also includes a café, refectory and community and engagement uses, was opened in Autumn 2023.</p> <p>The Outline Consent shows how the remainder of the student accommodation, academic uses and supporting retail not delivered as part of Phase 1 will come forward during Phase 2 and across the following outstanding development plots: Pool Street East (31,400 sqm), Marshgate Plot 2 (38,700 sqm), Plot 3 (48,300 sqm), and Plot 4 (38,200 sqm). The Outline Consent assumes construction during 2030-2034 for these later plots, but work is ongoing at UCL with regard to programming their delivery.</p> <p>With the above in mind, UCL has a strong interest in any planning policy developments which occur in the QEOP and Newham area, especially with LLDC transferring its planning powers to LBN on 30 November 2024. UCL previously submitted representations in February 2023 for the Regulation 18 consultation of the LBN Draft Local Plan. On behalf of UCL, we now submit the following comments in relation to the Local Plan Regulation 19 consultation.</p>		
Reg19-E-191	University College London	Deloitte	Reg19-E-191/018	General															<p>In summary, UCL is largely supportive of the principles set out in the Regulation 19 consultation document of the draft Newham Local Plan, but has some concerns where draft policy remains unchanged in response to previous comments or where some provisions have been omitted from the Regulation 19 draft Local Plan. On behalf of our client, we would be grateful for the opportunity to work further with LBN to help shape forthcoming planning policy. We therefore request to be kept informed of in the preparation and examination of the Local Plan.</p> <p>If you have any queries with regard to the comments set out in this letter, please contact (contact details redacted). In the meantime, we would be grateful for confirmation of receipt of this letter.</p>		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-192	Abrdn	Montagu Evans	Reg19-E-192/002	General															<p>PUBLIC CONSULTATION – NEWHAM DRAFT SUBMISSION LOCAL PLAN (REGULATION 19) REPRESENTATIONS ON BEHALF OF ABRDN</p> <p>We write on behalf of our client abrdn as a key landowner at Gallions Reach / Beckton Riverside in response to the Newham Draft Submission Local Plan (Regulation 19) consultation. This letter has been submitted as part of the formal consultation process. All comments have also been submitted by Montagu Evans on behalf of abrdn using the Council’s Regulation 19 Response Form.</p> <p>The purpose of the consultation document is to set out the Council’s vision, objectives, spatial strategy and planning policy framework which the Council will address the challenges and makes the most of opportunities which face Newham now and in the future. The Regulation 19 consultation document is informed by the responses received on the Issues and Options consultation held at the end of 2021, the Draft Local Plan (Regulation 18) consultation in early 2022, the evidence base documents, emerging Council and Regional Strategies and area specific guidance including the Royal Docks and Beckton Riverside Opportunity Area Planning Framework (“OAPF”).</p>		Comment noted.
Reg19-E-192	Abrdn	Montagu Evans	Reg19-E-192/004	General															<p>abrdn requests to meet with the LB Newham Planning Policy team at the earliest opportunity to discuss the next steps for this critical Neighbourhood Policy allocation prior to the submission of the Draft Local Plan for examination.</p> <p>The following representations are broken down into two parts focusing upon Gallions Reach / Beckton Riverside including Gallions Reach Shopping Park:</p> <ul style="list-style-type: none">• Asset Management• Redevelopment		Comment noted.
Reg19-E-192	Abrdn	Montagu Evans	Reg19-E-192/033	General															<p>We consider that it is necessary to meet with the LBN Planning Policy team, we therefore strongly request a meeting at your earliest convenience to discuss this matter in further detail. abrdn also request to participate in any Local Plan hearing sessions at such a time the Draft Submission Local Plan is submitted for Examination.</p>		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-193	Hajra Hafeji		Reg19-E-193/001	General							No	No						No	The Local Plan as it currently stands is fundamentally unsound and fails to comply with the duty to co-operate		Comment noted. The Duty to Cooperate is the obligation to engage on strategic matters with other Local Planning Authorities and prescribed bodies as part of the Localism Act 2011. The prescribed bodies are set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. The Council considers that we have fulfilled this requirement and our approach is set out in our Duty to Cooperate Report which is published on the Council's website.
Reg19-E-194	London Borough of Tower Hamlets		Reg19-E-194/003	General															We wish to have the opportunity to participate in hearing sessions should this be deemed necessary, which we believe is justified given both boroughs continue to cooperate on a number of strategic cross-boundary matters through the Duty to Cooperate. The purpose of this letter is to seek clarification on the aforementioned matter and express support for many of the policies in the Plan. This letter is set out under the following headings: 1. Background 2. Support for policies 3. Matters requiring clarification 4. Conclusion		Comment noted.
Reg19-E-194	London Borough of Tower Hamlets		Reg19-E-194/004	General															1. Background As you will likely be aware, Tower Hamlets is currently in the process of producing a new Local Plan. This is currently undergoing Regulation 19 consultation, and we are intending to submit our Plan to the Secretary of State early in 2025. As part of our Regulation 19 consultation, we have published a Duty to Cooperate statement, which sets out key strategic matters and how Tower Hamlets has engaged with prescribed bodies and neighbouring local authorities on these matters. This includes the extensive engagement that we have had with LB Newham on numerous strategic cross-boundary issues.		Comment noted.
Reg19-E-194	London Borough of Tower Hamlets		Reg19-E-194/023	General															4. Conclusion Overall, we support the principles and objectives of the LB Newham Draft Submission Local Plan.		Comment noted.
Reg19-E-194	London Borough of Tower Hamlets		Reg19-E-194/026	General															We look forward to continue conversations with Newham as part of ongoing discussions of strategic matters as part of the Duty to Cooperate.		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-194	London Borough of Tower Hamlets		Reg19-E-194/027	General															<p>Tower Hamlets broadly supports the policies in the LB Newham Draft Submission Local Plan, and we have set out in Section 4 where we wish to particularly express support.</p> <p>We look forward to continuing to work closely with LB Newham on strategic matters as we both move forward in the plan-making process.</p>		Comment noted.

Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/001	General														<p>1 Introduction</p> <p>1.1 Quod is instructed by St William Homes LLP (“St William”) as part of the Berkeley Group to submit representations to the London Borough of Newham (LBN) Draft Submission Local Plan (Regulation 19) (June 2024), which was published for consultation in July 2024 and remains open for comment until 20h September 2024.</p> <p>1.2 St William welcomes the opportunity to continue to engage with the Local Plan process and provide representations to this Draft Submission version of the Local Plan. The comments enclosed should be read in the context of the comments submitted to the Regulation 18 consultation draft in February 2023.</p> <p>St William</p> <p>1.3 St William regenerates and transforms derelict former gasworks sites. Their driving purpose is to create high quality homes, strengthen communities and improve people’s lives through fantastic placemaking. St William specialise in long-term brownfield regeneration, focusing on challenging and complex sites. Very few developers have the expertise to regenerate and deliver homes and new communities on such sites, however, St William has an excellent track record of doing so.</p> <p>1.4 Former gasworks sites have a critical role to play in the delivery of needed homes in London; the London Plan identifies former utilities sites (including gasworks) as a strategic brownfield source to deliver housing, reflecting the NPPF’s emphasis on making the most effective and efficient use of brownfield land for housing supply.</p> <p>1.5 St William is part of Berkeley Group, which in total has 26 sites in the portfolio at present under construction within London, with a further 12 in the pipeline.</p> <p>1.6 Four of these sites located within the Borough:</p> <p>1) Twelvetrees Crescent, Bromley by Bow Gasworks;</p> <p>2) Beckton Gasworks, Armada Way, Beckton;</p> <p>3) Land at Leigh Road, Former East Ham Gasworks; and</p> <p>4) Former Abbey Lane Gasworks Site, off Rick Roberts Way, Stratford (currently within LLDC).</p> <p>1.7 In addition to the four St William sites listed above, Berkeley Homes (South East London) Limited another division of the Berkeley Group have a further land holding at Twelvetrees Park, West Ham. This site immediately adjoins the Bromley by Bow Gasworks to the east and sharing the same site allocation (adopted site allocation S11 and draft site allocation N7.SA2).</p> <p>1.8 Berkeley Homes (South East London) (BHSEL) has a proven track record for delivering sustainable and inclusive mixed-use regeneration projects across London and the South East and have a reputation for delivering high quality</p>	Comment noted.
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																			homes and associated uses. They work with key stakeholders to tackle the shortage of good quality homes and make a lasting and sustainable contribution to the landscape and communities that they create. 1.9 These representations have been prepared in relation to all four St William Sites within LBN: the Bromley by Bow Gasworks; Beckton Gasworks, East Ham Gasworks and the Former Abbey Lane Gasworks. 1.10 Where comments are made in relation to general policies they are made on behalf of Berkeley Homes (South East London) Limited as well however separate representations are submitted (by Berkeley Homes (South East London)) in relation to the site allocation for Twelvetreets Park.		

Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/002	General														<p>Bromley by Bow</p> <p>1.11 Bromley by Bow Gasworks is located between West Ham and Bromley by Bow and measures 9.15 ha in total. It contains seven Grade II listed gasholders, the only kind in the world and four residential dwellings located to the north-eastern corner of the Site. A site plan is enclosed at Appendix 1 [see pg 60-61].</p> <p>1.12 The Site is a significant and strategic site located within the Poplar Riverside Opportunity Area and allocated within the existing Local Plan under Site Allocation S11 Parcellforce and within the draft Local Plan (Regulation 19) as Site Allocation N7.SA2 TwelveTrees Park and Former Bromley by Bow. A copy of the existing site allocation can be found at Appendix 2 [see pg 62-63] and the draft site allocation at Appendix 3 [see page 64-69]. As noted above, Bromley by Bow Gasworks shares this strategic site allocation with the adjoining TwelveTrees Park development, a 10.69ha site which is owned by a separate division of the Berkeley Group (Berkeley Homes (South East London) Limited, and which is already subject to an extant planning permission.</p> <p>1.13 St William are looking to bring the Site forward for redevelopment in line with the requirements of the site allocation. It is an important site for the borough, as an underutilised, vacant brownfield site that is allocated within both the current adopted Plan and draft Local Plan and it provides a significant opportunity to assist Newham with delivering against its Local Plan and Corporate objectives.</p> <p>1.14 In line with adopted Site Allocation S11 and draft Site Allocation N7.SA2 this includes the delivery of much needed housing, employment floorspace that meets a local need, the provision and completion of new connections between Bromley by Bow and West Ham, new open space and importantly the viable re-use of the listed gas holders which are currently inaccessible to the public. Importantly, Bromley by Bow Gasworks has the ability to join together a number of disparate sites and land uses in this part of the Lower Lea Valley, delivering an iconic development and creating a more coherent sense of place.</p> <p>1.15 St William secured resolution to grant from LBN’s Strategic Development Committee on 18th June 2024 following several years of pre-application discussions with planning and policy officers at LBN and hopes to be able to start on site in Q4 2025 with the first homes coming forward within the first five years of the adopted Local Plan.</p>		Comment noted.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/003a	General														<p>Beckton</p> <p>1.16 Beckton Gasworks is an 84.12 acre site located in the east of the borough fronting the River Thames and forming broadly a horse shoe shape.</p> <p>1.17 The Site is bound to the north by Armada Way and Gallions Reach Shopping Park, to the north east by Gemini Business Park, beyond which lies the Thames Water Beckton Sewage</p>		Comment noted.

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Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/004	General															<p>East Ham</p> <p>1.22 The former East Ham Gasworks is located between East Ham and Barking stations in the eastern part of the Borough. The Site is bound to the north by Stevenage Road and associated residential uses, to the east by the North Circular Road (A406), to the south by Watson Avenue and associated residential uses, and to the west by Leigh Road and associated residential uses. A site plan is enclosed at Appendix 7 [see pg 81-82]. The Site comprises of a gasometer and associated gas operational equipment located on previously developed land accessed off Leigh Road. It is located within a wider setting of unmaintained open space designated as Metropolitan Open Land that is not currently accessible to the public. There are also multiple gas easements and Thames Water structures which cross the site.</p> <p>1.23 The adopted Local Plan (2018) identifies the principal areas of previously developed land, and the MOL classification (GS82). The Site is not subject to a site specific allocation within the adopted Local Plan. The Site has been allocated within the East Ham neighbourhood (N13 East Ham) and as a new draft site allocation N13.SA3 Former East Ham Gasworks within the Local Plan Refresh Regulation 19 draft (copy enclosed at Appendix 8 [see pg 83-87]).</p>		Comment noted.

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Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/005	General															<p>Rick Roberts Way</p> <p>1.24 The Site was part of a larger former gasworks, located between Rick Roberts Way and Abbey Lane and measures 0.98 ha in total. 0.07 of the Site, including the Pressure Reduction Station, electricity mast and sub-station will be retained on the site. A site plan is enclosed at Appendix 9 [see pg 88-89]. The remainder of the Site, comprising 0.91 ha, currently contains various infrastructure associated with the former use as a gasworks site and comprises the developable area. The gasholder frames have already been dismantled and the remainder of the gasworks infrastructure will be removed from the site.</p> <p>1.25 The Site is a significant site, allocated in the Legacy Development Corporation (LLDC) Local Plan (Adopted July 2020) and allocated in the draft Newham Local Plan (Regulation 19) as part of Site Allocation N8.SA7 Rick Roberts Way. A copy of the draft site allocation at Appendix 10 [see pg 90-94]. As noted above, the gasworks site shares this strategic allocation with the land to the north west, owned by LLDC and LBN.</p> <p>1.26 An application for the redevelopment the site was submitted to LLDC in December 2023. It is anticipated that the proposals will be determined at planning committee in October 2024.</p>		Comment noted.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/006	General															<p>TwelveTrees Park</p> <p>1.27 The TwelveTrees Park site, is a large tract of derelict brownfield land, adjacent to a major transport interchange at West Ham. It presents a significant opportunity to create a new piece in Newham’s urban fabric in a highly accessible and sustainable location. The Site has an extant hybrid planning permission (reference: 17/01847/OUT) for the comprehensive redevelopment of the site, which has been implemented in part with the first phase of development under construction. A Section 73 and Reserved Matters Application have recently been submitted to LBN to make necessary amendments to the extant permission.</p> <p>1.28 TwelveTrees Park represents significant investment in the Borough and includes new transport infrastructure, a new London scale park, significant housing delivery and a new Local Centre. The proposals are founded in BHSEL’s commitment to quality and placemaking which is reflected in the landscaping and architectural quality proposed by the development.</p>		Comment noted.

[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
																			Plan and is pleased to comment on this proposed submission draft. Whilst we do not repeat previous commentary outlined in the Regulation 18 representations we do continue to make a number of specific comments in relation to certain policy requirements and site allocations particularly where we consider that as currently drafted they are not in line with paragraph 35 of the NPPF.		
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/008	General															<p>1.36 In order to achieve its objectives, the Local Plan needs to ensure it is deliverable and directs development within the borough positively. Paragraph 31 of the NPPF sets out the process for preparing and reviewing Local Plan.</p> <p>“The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.”</p> <p>1.37 As demonstrated through slow housing delivery rates over the last few years, development, particularly on complex brownfield sites, is facing challenging economic conditions. Increasing build costs, high interest rates, new regulations and policy layering is severely impacting the viability of projects. In reviewing their Local Plan LBN need to ensure the Plan allows for sufficient flexibility in the application of their policies to support good, well designed, sustainable development to come forward. This is imperative to ensure the Local Plan facilitates the delivery the much-needed housing for the borough.</p> <p>1.38 St William’s sites and redevelopment proposals for their sites, provide an excellent opportunity to assist LBN with significant housing delivery and employment growth and regeneration as well as addressing some of the key issues that they are facing across the borough. St William want to continue to work with LBN to ensure their development proposals are as closely aligned as possible with LBN’s key objectives whilst also ensuring that the new Local Plan can be as supportive in enabling development in the borough.</p>		Comment noted.

Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/156	General															<p>17.1 St William welcomes the opportunity to input to the Regulation 19 version of the draft Local Plan and trusts that the enclosed comments are clear and constructive highlighting where proposed policies are not considered to be sound at this important stage of the Local Plan process.</p> <p>17.2 St William acknowledge the overall positive approach that is being taken to development proposals within the Borough and appreciate that LBN have carried out significant work to date in developing the new Local Plan. However, as outlined in this representation, St William consider that elemnets of the Regulation 19 draft Local Plan in their current form are not sound.</p> <p>17.3 Challenging economic conditions due to increasing build costs, high interest rates, new building regulation etc have severely impacted the deliverability and viability of housing, particularly on complex brownfield sites and within the Borough. As set out in the NPPF and PPG, the Local Plan needs to ensure the cumulative impact of its policies do not further hamper the delivery of much needed housing in the borough. St William consider that the policy wording specifically in relation to affordable housing requires set by Policy H3 is not realistic, will leave the public benefits of development unrealised and crucially will further stifle poor housing delivery rates in the Borough.</p> <p>17.4 St William takes seriously its role as a responsible developer and has extensive experience of delivering high quality homes and places that improve people’s lives and create new and inclusive communities. St William’s sites represent a huge opportunity to deliver not only much needed new homes for the borough but a range of public benefits. St William want to use their experience for the benefit of the Borough and its residents and ensure that forthcoming developments at the Bromley by Bow, TwelveTrees Park, Beckton Riverside, East Ham and Rick Roberts Way can be used to set an example for development in the borough and help LBN to tackle some of the key issues it is facing.</p> <p>17.5 St William acknowledges the amendments that LBN have made to date to the emerging Local Plan in preparing a new development framework for the Borough as well as the opportunity to continue to work with LBN and other stakeholders as it proceeds with submission of the draft Local Plan.</p> <p>However, in its current form, St William do not consider that the Regulation 19 draft Local Plan is sound. St William would therefore welcome the opportunity to discuss their comments on the draft planning policies and relevant site allocations in further detail with Policy Officers.</p>	Comment noted.
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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-196	Daminis Limited	Planning Insight	Reg19-E-196/001	General															Third Consultation: Draft Submission Local Plan (Regulation 19) I write to you on behalf of Daminis Limited who is a landowner on Green Street.		Comment noted.
Reg19-E-197	NHS HUDU		Reg19-E-197/001	General							Blank	Blank						Blank	Thank you for the opportunity to respond to the Newham Proposed Submission Draft Local Plan. This response has been prepared in consultation with local NHS partners and builds on the representation submitted to the Council's regulation 18 consultation. The North East London Integrated Care Board (ICB) has led on the wider NHS contribution to the Council's Infrastructure Delivery Plan, and the quantum of primary and community infrastructure required to support the delivery of the plan, and we have therefore left comments on the wording of the site allocations and the IDP for the ICB to provide a detailed response. We welcome the changes that the Council has made in response to our earlier representation, however, we are concerned that aspects of the plan have not been modified as requested and indeed some wording supported has been omitted from the latest draft.		Comment noted.
Reg19-E-197	NHS HUDU		Reg19-E-197/006	General							Blank	Blank						Blank	We look forward to working with the Council and partners in delivering the vision and objectives of the local plan.		Comment noted.
Reg19-E-198	Siraj Hafeji		Reg19-E-198/001	General							No	No						No	The current Local Plan is not in compliance with legal requirements and does not fulfill the obligation to collaborate effectively.		<p>Comment noted. The Council has a number of requirements in relation to consultation. The Duty to Cooperate is the obligation to engage on strategic matters with other Local Planning Authorities and prescribed bodies as part of the Localism Act 2011. The prescribed bodies are set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. The Council considers that we have fulfilled this requirement and our approach is set out in our Duty to Cooperate Report which is published on the Council's website.</p> <p>In addition we are required to engage with local stakeholders through the plan making process and as part of our wider Council's commitment to ensuring residents can participate in our work. As such we have made wide ranging efforts to engage with local communities as part of the developing the Plan, as demonstrated in the Issues and Options, Regulation 18 and Regulation 19 Consultation Reports.</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-200	London City Airport		Reg19-E-200/004	General															Detailed comments are provided in the Annexures to our submission, which include: <ul style="list-style-type: none">• Annex 1 – Detailed commentary in relation to Part 1 of the Draft Newham Regulation 19 Plan;• Annex 2 – Visual demonstration of amendments required to the Key Diagram and Policies Map;• Annex 3 – Specific commentary in relation to the proposed aviation safeguarding provisions contained under Part 2 of the Draft Newham Regulation 19 Plan; and• Annex 4 – LCY Background and contextual information in Newham		Comment noted.
Reg19-E-200	London City Airport		Reg19-E-200/007	General															Appended to this letter is a table with required amendments to the Regulation 19 draft policy. Our more general commentary on Policy T5 is provided below in the context of the ‘soundness test’ and associated criteria in paragraph 35 of the NPPF:		Comment noted.
Reg19-E-200	London City Airport		Reg19-E-200/029	General															Conclusion While we regard the current draft of the Local Plan has moved forward since its previous iteration, we still have fundamental concerns regarding the content of policy T5 but hope this consultation response will prove helpful in shaping the Plan’s future direction. We look forward to engaging with officers directly.		Comment noted.

Reg19-E-200	London City Airport		Reg19-E-200/057	General															Annex 4 – London City Airport Background and Context Current contribution to Newham As noted in draft plan (paragraph 3.341), London City Airport is the largest private sector employer in the borough and a catalyst for investment in East London. London City Airport employs over 2,000 people, many of whom are from the London Borough of Newham and the Local Area. The airport also supports over £500 million a year of economic activity in the local area from its operation and the wider business productivity and tourism benefits arising from the connectivity it offers. Much of this benefit is realised within the borough of Newham. The airport works directly with the Council to enhance employment opportunities for residents and contributes towards many local education and training opportunities. Many Newham businesses also benefit both directly from contracts with the airport and indirectly through the UK regional and international connectivity which is enabled by the airport. As a responsible employer, the airport has delivered on its commitment to become a London Living Wage employer and is rolling this commitment out to its key direct suppliers. It is also an early adopter of the Mayor of London’s Good Work Standard, becoming the first UK airport to achieve both milestones. The airport has a wide range of ongoing community initiatives, many of which directly benefit Newham’s students; residents; businesses; vulnerable groups and voluntary groups/charities. Some of our current initiatives are summarised below: • Community Fund – since launching our £75,000 annual Community Fund in May 2019, over £435,000 has been awarded to over 135 charities and not-forprofit organisations in the local area. In 2023, £50,000 of this funding went directly to support local foodbanks. • Meet The Buyer event – launched in 2018, our annual Royal Docks Meet the Buyer events give Newham’s small and medium sized enterprises (SMEs) a unique opportunity to create ongoing relationships with buyers in London’s Royal Docks and beyond. At our 2023 event, 150 SMEs attended the event. The 2023 Meet the Buyer event resulted in over £2.9m worth of contracts generated, meaning that we have now helped to generate more than £10m overall for local businesses since starting the event in 2018. • STEM in Aviation – The aviation industry is seeing a rising demand for STEM skills. Our annual ‘STEM in Aviation’ events aim to tackle this rising skills shortage by inspiring school students. In 2023, 23 East London schools (including 7 from Newham) attended the STEM event in Excel, with over 500 East London 16 students meeting businesses within the aviation and STEM field, including GKN Aerospace, Boeing, UK Power Network Services, Accenture, Atkins Realis, BACF and NATS. • Youth Mentoring Programme – in 2023, 15 students were mentored by 8 LCY volunteers, covering topics such as	Comment noted.
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																			resilience, positive social behaviour, setting targets and employability skills. Since launching, the programme has supported 45 students, with up to 24 staff volunteering to support young people. • Women in Aviation Programme – launched in 2019 and relaunched in 2023 to attract the next generation of female aviation leaders on the airport’s doorstep, the Women in Aviation Programme in 2023 supported circa 300 young women in the local area to gain knowledge, understanding and awareness of the STEM/Aviation field and the jobs available to them. • Staff volunteering 2023 – LCY launched a new policy in 2023 which allows staff to volunteer 8 hours annually, enabling more staff to go out and support the local community. In 2024, staff will be able to increase this to volunteer 16 hours annually. Throughout 2023, 122 staff from LCY volunteered 640 hours in a variety of different activities, including in relation to the volunteering fortnight programme in July and the ‘12 Days of Giving’ programme in December. • Sponsorships – LCY supported a number of community partnerships through 2023, and sponsored the Newham Champer of Commerce Business Award ‘Sole/Micro Trader of the Year’, as well as the Royal Greenwich Business Awards. LCY also made donations including to the King’s Coronation, Eid Celebration and the Summer Festival, Diwali local events, and to local centres in the form of fruit donations.		
Reg19-E-201	Shakeel Ismail		Reg19-E-201/003	General							No	No							Duty to Cooperate: The draft plan does not sufficiently engage with local stakeholders, including our community. This failure to meaningfully collaborate demonstrates non-compliance with the duty to cooperate, which is a legal requirement. [originally put against Policy SI1, SI2 and SI3, paragraph 455,456 and policies map N7 SA1, however taken this part of the response forward against General]	To make the Local Plan legally compliant and sound, the following modifications are necessary: Community Engagement and Collaboration: Our community is eager to collaborate with landowners and the relevant authorities to design and deliver a replacement facility that reflects the actual needs of its users. This collaboration is essential for ensuring the facility is functional, inclusive, and adaptable to future growth. The plan should specifically outline mechanisms for ongoing consultation with the community to ensure compliance with the duty to cooperate.	Comment noted. The Duty to Cooperate is the obligation to engage on strategic matters with other Local Planning Authorities and prescribed bodies as part of the Localism Act 2011. The prescribed bodies are set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. The Duty to Cooperate does not require us to engage with local stakeholders, however this is still a requirement of the plan making process and part of our wider Council's commitment to ensuring residents can participate in our work. As such we have made wide ranging efforts to engage with local communities as part of the developing the Plan, as demonstrated in the Issues and Options, Regulation 18 and Regulation 19 Consultation Reports.

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Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/001	General								No							<p>On behalf of our client, The Silvertown Partnership LLP (TSP), please find enclosed representations to the Regulation 19 (pre-submission) Consultation on the draft Newham Local Plan Review.</p> <p>TSP is bringing forwards the residential-led mixed-use redevelopment of the Silvertown strategic development site in the Royal Docks. The Site is within the Royal Docks and Beckton Opportunity Area and benefits from a strategic site allocation (S21) in the existing Newham Local Plan (2018), in addition to an existing Outline Planning Permission (OPP) (approved in 2016 – ref. 14/01605/OUT) and Phase 1 reserved matters approval (approved in 2019 – ref. 19/02657/REM) as well as other more minor reserved matters approvals. TSP commenced the delivery of homes on site under the OPP in 2023 and the OPP with its approved quantum of floorspace remains deliverable across the Site.</p> <p>Concurrently, a Hybrid Planning Application (HPA) (ref: 22/02855/OUT) has been submitted for the site, which once approved will supersede all existing permissions and will enable a significant increase to the delivery of homes on site whilst also providing other planning benefits.</p> <p>We have submitted representations on behalf of TSP at the previous two stages of Regulation 18 (issues and options) Consultation, in December 2021 and February 2023, and these representations draw on our previous representations where relevant.</p> <p>These representations have been set out in two parts. The main representations are contained within this letter and comprise the key strategic representations of TSP. Within Appendix A, a series of further detailed comments are provided, supported by proposed amendments to key policies.</p>		Comment noted.

Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/002	General															Silvertown Hybrid Planning Application - Overview The HPA is for the strategic regeneration of Silvertown Quays, which is a site allocation (S21) in the adopted Local Plan and an emerging Site Allocation in the Regulation 19 draft Local Plan (N2.SA1). The HPA will supersede the current implemented planning permission for the Site - the OPP and its associated Reserved Matters approvals - and will enable the delivery of a new and improved vision for Silvertown which demonstrates that it is a positive example of development which is in line with the broad aspirations of the emerging Local Plan. The HPA has been in development for several years, well in advance of the first consultation on the emerging Local Plan in December 2021. The HPA will result in wide-ranging planning benefits. The HPA is for the transformative residential-led mixed use regeneration of one of the largest and most strategically important sites in the Royal Docks and London as a whole; a site in public ownership that has been derelict and largely disused for circa 40 years. The HPA will contribute significantly towards LBN’s housing targets by including residential floorspace that is expected to provide approximately 6,500 homes, representing an increase of around 3,500 new homes compared to the OPP (which approved c.3,000 homes). The HPA will create considerable employment opportunities across a range of sectors. This will start at construction stage with the creation of a range of construction jobs. The HPA has created Mills Quarter which is centred around the refurbished and extended Millennium Mills building where flexible workspace is proposed for a mix of office, learning and education, exhibition, museum and research and development uses. To the east of Millenium Mills is Silverworks, where flexible workspace/makerspace is proposed intended for light industrial, film studio and office uses. To the south, fronting North Woolwich Road, opportunities for business incubation and micro-scale coworking are identified. The HPA will create extensive community facilities and social infrastructure including land for a new primary school on-site, along with floorspace for new healthcare facilities, nurseries and community uses, all secured by a Section 106 Agreement. Significant financial contributions will also be made via the Section 106 Agreement and the Community Infrastructure Levy (CIL). A significant amount of green infrastructure is proposed, centred on a series of defined Open Spaces ranging from public squares to public parks. In addition, there will be several smaller green spaces and an array of play spaces suitable for children and young people of all ages. The HPA will also be in line with biodiversity net gain requirements and urban greening that respond to the site’s current features, including on the green roofs that are proposed sitewide. The HPA has been designed to minimise	Comment noted.
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																			its carbon footprint. The Site will be net zero in operational carbon and will have climate change resilience embedded into its built form. The Proposed Development will promote renewable energy generation, decentralised energy networks, sustainable drainage, substantial urban greening delivering biodiversity net gains, and the circular economy including adaptability. It will be an exemplar of a highly sustainable modern, large-scale mixed-use development. TSP’s main representation is that the proposed policies, particularly in relation to the Silvertown Quays site allocation (N2.SA1), should be consistent with the HPA proposals. The HPA has been the subject of extensive consultation and engagement between TSP, the Council and various other stakeholders over a number of years and is at a relatively advanced stage of determination. Promoting draft policies that are fundamentally inconsistent with the HPA proposals for the Silvertown Quays site would therefore be unsound and would undermine the significant work that has already been undertaken between TSP and the Council’s development management officers. The main representation is expanded on below in relation to specific policies under the following headings: 1. Spatial Strategy / Key Strategic Policies 2. Royal Victoria Area / Site Allocation 3. Affordable housing (tenure and mix) and Design policies 4. Development Management Policies We have linked back to our representations on the Regulation 18 Local Plan, as required, throughout. Appendix A includes more detailed representations including proposed track changes to policy.		

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Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/023	General															<p>Development Management Policies</p> <p>There are several development management policies within the Regulation 19 pre-submission document which require major development applications to submit specific technical reports to the Council to better understand the proposed development. The nature of some of the required reports are very prescriptive and their inclusion could unnecessarily extend the determination period needed to determine applications and place a strain on the Council's resources. The detailed representations contained at Appendix A build on these comments.</p> <p>Summary</p> <p>We trust that these representations are of assistance in identifying where certain sections of the pre-submission (Regulation 19) draft Local Plan, which is generally supported by TSP, needs further review and amendments.</p> <p>Should you have any queries or require any further information in respect of the above, please contact Heloise Whiteman or Alasdair Buckle of this office.</p>		Comment noted.

Reg19-E-203	GLP (International Business Park, Rick Roberts Way)	Quod	Reg19-E-203/001a	General														<p>Introduction and Summary of Regulation 18 Representations</p> <p>We are writing on behalf of our client GLP Limited ('GLP') in response to the consultation on the London Borough of Newham Regulation 19 Draft Local Plan. We write in relation to the GLP-owned, International Business Park, Rick Roberts Way, Stratford, E15 2NF ('the Site'). The Site extends within the red and blue boundary on Figure 1 below [Figure 1 is a map of the site]. The wider context of the Site is shown on Figure 2 [Figure 2 is wider site context].</p> <p>These representations to the Newham Regulation 19 Draft Local Plan include input from Icení's specialist Built Heritage and Townscape team. Icení's full representations can be found in Appendix 1 and should be read in conjunction with these representations.</p> <p>In February 2023, Quod submitted representations on behalf of GLP in response to the consultation on the London Borough of Newham Regulation 18 Draft Local Plan. A summary of the representations and the extent to which they have been addressed in this Regulation 19 Draft Local Plan is set out in Appendix 2.</p> <p>Background Context</p> <p>The Site</p> <p>The GLP land ownership extends to the land edged in blue on Figure 1 and comprises the four buildings identified in Figure 2. In August 2023, GLP submitted a planning application (application ref: 23/00299/FUL) for the redevelopment of Unit 1 of the International Business Park. This is shown within the red boundary on Figure 1. The planning application sought permission for the demolition of the existing building and construction of three industrial, distribution and storage buildings. GLP intend to redevelop the entirety of the Site on Rick Roberts Way in a phased manner to provide an intensification of employment uses. The application submitted in August 2023 effectively forms the first part of that phase.</p> <p>On 26th March 2024, the London Legacy Development Corporation Planning Decisions Committee resolved to approve the application and the S106 is currently in the latter stages of agreement. The draft Local Plan allocates the Site as a Local Industrial Location (LIL4) for the following uses:</p> <p>§ General industrial, warehousing and office units with dedicated yard space.</p> <p>§ Blue-chip occupiers and other industrial occupiers servicing the CAZ.</p> <p>It is also designated within Tall Building Zone Policy D4 as being with Tall Building Zone 18, where prevailing heights are above 9m but below 21m and the maximum height range for this part of the TBZ18 is 32m. It is also within Flood Zone 2.</p> <p>Surrounding Site Context</p> <p>The land on the opposite side of Rick Roberts Way is the subject to a site</p>	Comment noted.
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																			allocation in the existing Local Plan for up to 750 new homes and school. This allocation is carried forward in the emerging Local Plan in draft allocation N8.SA7. The draft allocation states that this site is suitable for residential, employment uses, sports and recreation uses, education and open space with buildings heights predominantly between 21-32m and taller elements up to 50m. This draft allocation is shown below at Figure 3 [Figure 3 is Draft Site Allocation N8.SA7] . In January 2024, St William submitted a full planning application for the redevelopment of the former gasworks site to the south of Rick Roberts Way to deliver 235 dwellings (ref. 23/00457/FUL). Whilst the application has not been determined at the time of writing, the scheme has been subject to a number of pre-application meetings and consultation comments, including from LLDC design officers, following submission. A site location plan for the St William scheme is shown below at Figure 4 [Figure 4 is St William Site Location Plan] .		
Reg19-E-203	GLP (International Business Park, Rick Roberts Way)	Quod (Iceni)	Reg19-E-203/007	General															[Please see Appendix 1 of representation] This note is prepared as part of the representations to the Regulation 19 Draft Newham Local Plan Consultation (draft NLP) submitted on behalf of GLP. It considers heritage, townscape and design matters, with a particular focus on tall building policy for the area surrounding The International Business Park, Rick Roberts Way, Stratford, E15 2NF. 2. This note first considers The Regulation 19 Draft New Local Plan, followed by the following evidence base documents to support the NLP (2024); <ul style="list-style-type: none">• Newham Characterisation Study (2024)• Tall Building Annex (2024) 3. In summary of the below, we believe there is capacity for height at the Mercedes Garage Site, in line with that identified for nearby sites along Rick Roberts Way, given an more consistent application of the suitability criteria set out in the evidence base documents, specifically the Tall Building Annex (2024).		Comment noted.
Reg19-E-203	GLP (International Business Park, Rick Roberts Way)	Quod	Reg19-E-203/018	General															[Appendix 3 of their response provides Surrounding Planning History]		Comment noted.

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Reg19-E-204	Historic England		Reg19-E-204/001	General							Blank	Blank							<p>Thank you for the opportunity to comment on the above consultation document. As the Government’s adviser on the historic environment, Historic England is keen to ensure that the conservation and enhancement of the historic environment is taken fully into account at all stages and levels of the Local Plan process.</p> <p>Our comments are made in the context of the principles relating to the historic environment and local plans within the National Planning Policy Framework (NPPF) and the accompanying Planning Practice Guide (PPG). They focus in particular on whether the draft Plan makes sufficient provision for the conservation and enhancement of the historic environment in Newham through strategic policies (NPPF, para 20), whether the identified evidence base for the historic environment is relevant and up to date (para 31) and if the Plan therefore sets out a positive strategy for its conservation and enjoyment (para 190). Historic England has produced advice on this process which can be found here: https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-localplans/gpa1/</p>		Comment noted.
Reg19-E-204	Historic England		Reg19-E-204/007	General							Blank	Blank							<p>I trust these comments are helpful. We would encourage the Council to ensure that your own conservation staff are involved throughout the local plan process to help ensure that heritage issues are adequately addressed. Please note that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from these documents, and which may have adverse effects on the environment. Please do not hesitate to contact me should you require any further information.</p>		Comment noted.

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Reg19-E-206	GLP (Land at Central Thameside West and Former Alnex site)	DP9	Reg19-E-206/01	General															<p>We write on behalf of our client, GLP, who are bringing forward the Land at Central Thameside West and Former Allnex site (the Site) in the borough. As you are aware, the Site has received a resolution to grant planning permission at the Strategic Development Committee on 18th June 2024 (ref. 23/01697/OUT) for the following development:</p> <p>1.Hybrid planning application for a phased mixed-use redevelopment comprising up to 213,239sqm GEA: Detailed component: a)Site wide enabling works relating to ground works, remediation, raising of site levels, utilities works, security fencing, new accesses to the public highway, and construction of a relocated access road serving Peruvian Wharf; and b)Construction of a 64,203 sqm GEA data centre building (including ancillary office space) of up to 63.760m AOD in height, a security gatehouse and sprinkler building; construction of a primary substation; public open space, utilities works, landscaping, security fencing, pedestrian and cycle route, construction of estate roads, cycle and car parking areas and associated access and public realm works. 2.Outline component (all matters reserved): development above raised ground levels to provide up to 144,755 sqm GEA of data centre floorspace (including ancillary office space) (Use Class B8) in two buildings of up to 65m AOD in height; construction of a 2,355 sqm GEA multi-function building of up to 15.5m AOD in height (Use Class E / F1); landscaping, utilities works, construction of estate roads, cycle and car parking areas and associated access.</p> <p>Following the resolution to grant planning permission in June 2024, GLP are currently in the final stages of agreeing the Section 106 legal agreement and it is anticipated that the decision notice will be issued in Autumn 2024.</p>		Comment noted.

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Reg19-E-206	GLP (Land at Central Thameside West and Former Alnex site)	DP9	Reg19-E-206/01	General															<p>GLP Limited is a leading global investment manager and business builder in logistics, data infrastructure, renewable energy and related technologies. GLP Europe (formerly Gazeley) has a 30+ year track record of developing and managing logistics real estate across United Kingdom, one of Europe’s biggest logistics markets.</p> <p>These representations build on those previously issued in response to the Regulation 18 consultation on 20th February 2023. We have reviewed the Draft Submission Local Plan in the context of GLP’s interests and provide our representations to the policies to ensure that they meet the tests of soundness in Paragraph 35 of the National Planning Policy Framework (NPPF).</p> <p>The representations will cover the following matters:</p> <ul style="list-style-type: none">•Welcome the continued designation of the Site as Strategic Industrial Land and the intention to intensify the use of the Site for industrial purposes;•Support for the new designation of the Site within Tall Building Zone 13 with the recommendation for an alteration to the maximum building height proposed to reflect the current accepted planning position;•The onerous requirement of draft policies relating to energy and sustainability in the context of data centre developments; and•The requirements of draft policies relating to public realm in the context of industrial developments.		Comment noted.
Reg19-E-206	GLP (Land at Central Thameside West and Former Alnex site)	DP9	Reg19-E-206/22	General															<p>Conclusion</p> <p>To conclude, we welcome the opportunity to comment on the draft submission Local Plan and we hope that our recommendations on behalf of GLP are of assistance and will be taken into consideration by the Council in progressing the Local Plan.</p>		Comment noted.
Reg19-E-206	GLP (Land at Central Thameside West and Former Alnex site)	DP9	Reg19-E-206/24	General															<p>We do have some reservations about particular aspects of the proposed draft Local Plan, including the particularly onerous sustainability policies in the context of data centre developments. We would be happy to discuss our comments directly in order to inform the preparation of the Local Plan.</p>		Comment noted.

Reg19-E-207	Unibail-Rodamco-Westfield	DP9	Reg19-E-207/001	General								No	No						<p>We write on behalf of our client, Unibail-Rodamco-Westfield (URW), who own and operate the wider Stratford City Estate (SCE). This land is currently within the London Legacy Development Corporation (LLDC) boundary but we are cognisant of the return of planning powers back to London Borough of Newham (LBN) in December 2024 and the implications for the consideration of future planning applications.</p> <p>URW have played a pivotal role in shaping the success of Stratford prior to and since the 2012 Olympic Games. We are a long-term landowner, partner and investor in LBN and currently support around 8,000 local jobs. We look forward to continuing and extending our partnership with LBN following the return of planning powers from LLDC in December 2024.</p> <p>We recently obtained a resolution to grant planning permission from LLDC’s Planning Decisions Committee on 23rd July 2024 for an extension to Plot M2 (Car Park C) of Westfield Shopping Centre to provide a 520 bed student accommodation development, along with new rooftop public realm and ground level public realm enhancements (LLDC ref. 24/00113/FUL).</p> <p>We also engaged in early pre-application discussions with LLDC officers in 2022 in relation to a residential development on the largely vacant Plot M7B of the Stratford City Masterplan. Plot M7B benefits from outline planning consent for office development under the Stratford City Masterplan and reserved matters consent for an office building (LLDC ref. 16/00653/REM).</p> <p>We have reviewed the Draft Regulation 19 Local Plan in the context of URW’s interests across the wider SCE including the above sites and provide our recommendations to the policies to ensure that they meet the tests of soundness in Paragraph 35 of the National Planning Policy Framework (NPPF). These representations build on those previously issued in response to the Regulation 18 consultation on 20th February 2023. The representations will cover the following matters:</p> <ul style="list-style-type: none">• Support for the ambition and objectives of the draft Plan to direct significant growth to Stratford, deliver mixed use development including housing and the aspiration for Stratford to become an International town centre;• The shortcomings of the proposed tall buildings designation in meeting the need for housing and mixed use development in the Metropolitan Centre and the lack of recognition for the established character of the SCE and surroundings, extant consents and its low sensitivity to change; and• Concerns about the provisions relating to Purpose Built Student Accommodation, Build to Rent housing, affordable housing and housing mix in terms of the deliverability of these types of housing. <p>As will be clear from these representations, whilst we generally welcome the ambition and purpose of the</p>	Comment noted.
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																			<p>draft Local Plan, there are concerns that some policies will limit the ability of the Plan as a whole to deliver on its housing need. As such whilst we are supportive of much of the draft Plan, we have a number of reservations about its soundness in its current form and propose to set out a series of recommendations to assist the Council.</p> <p>These representations are made with the aim of achieving a sound Local Plan, that is consistent with other development plan policy and deliverable, building in flexibility where it is appropriate to do so. Support for the ambition and objectives of the draft Plan to direct significant growth to Stratford, deliver mixed use development including housing and the aspiration for Stratford to become an International town centre</p>		
Reg19-E-207	Unibail-Rodamco-Westfield	DP9	Reg19-E-207/013	General							No	No							<p>To conclude, we welcome the opportunity to comment on the draft submission Local Plan and we hope that our recommendations on behalf of URW are of assistance and will be taken into consideration by the Council in producing a sound the Local Plan. Following our previous representations on the Regulation 18 consultation document, we are pleased to see that the M7B Site has been included within the Site Allocation and the overall ambition for Stratford to become an International Centre. We do have some reservations about particular aspects of the proposed draft Local Plan, including the Tall Building Zones proposals and draft policies regarding housing mix, student housing and affordable housing that have the potential to overly constrain the supply of much needed new housing. We would be happy to discuss our comments directly in order to inform the preparation of the Local Plan.</p>		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-214	Good Hotel		Reg19-E-214/001	General															<p>Entrepreneurial Spirit & Training Programme</p> <p>The Good Hotel London, part of the Good Hospitality Group, has been successfully operating the Australa hotel vessel in the Royal Victoria Dock since it was floated across in 2016. Good Hotel is a non-dividend social impact business that reinvests profits in to training local people affected by unemployment as well as other International projects such as the schooling of children in Guatemala.</p> <p>The Good Hotel has been especially successful in harnessing its business for the benefit of the Good Training Programme. From 2017, Good Hotel has in partnership with ‘Our Newham Work’ provided hundreds of local people with on-the-job training and a start in the hospitality business. As such, it has be featured in Tom Kerridge’s BBC2 programme ‘The hidden world of hospitality’. Over the years the floating hotel vessel has partnered with many local charities including The Line and has collaborated with the GLA/Newham led Royal Docks team on multiple ventures, including art installations like Dock Lands People.</p> <p>In addition, the Good Hotel takes pride in making the Western end of the Royal Victoria Dock more accessible and attractive to enjoy for the local community and visitors alike. It is only about 8 years ago that the Corniche upon which it is moored was mostly empty and too windy for visitors to dwell. Since the Good Hotel arrived in London, the are on the Corniche has very much come alive and we are proud to say we have been able to achieve something of a coalition with the likes of RoDMA and ExCeL and Lendlease, in terms of all these players wanting to further bring to life the Corniche and the waters within the Royal Victoria Dock.</p>	Comment noted.	

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Reg19-E-217	LLDC		Reg19-E-217/001	General															<p>[From 1. 040920 LBN LP Reg 19 response Cover Letter] Thank you for the opportunity to formally comment on the London Borough of Newham (LBN) Regulation 19 Draft Submission Local Plan. This letter represents the London Legacy Development Corporation's (LLDC) response as both the current Local Planning Authority (LPA) for its area up until 1st December 2024 as well as a Mayoral Development Corporation (MDC) owning land and assets in the area and having responsibility for advancing plans for development.</p> <p>Overall, the draft Local Plan continues to be broadly supported and the on-going informal opportunities to cooperate and support its development to date have been very much welcomed, as are those amendments made to the Plan following the Regulation 18 consultation. However, we consider that there are some matters within the current, Regulation 19 draft of the Plan that should be amended in order to make those aspects of it sound and support the successful delivery of development within the borough, including LLDC's own sites projects. The matters that we consider should be addressed are outlined in this letter as well as the table included as Appendix 1 to this letter which sets out the specific wording or other changes required to the Plan. Both this letter and Appendix 1 should therefore be read together. [See Appendix 1 of response]</p>		Comment noted.

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Reg19-E-217	LLDC		Reg19-E-217/009	General															<p>Where we have been able to, Appendix 1 [please see appendix 1] outlines proposed amendments that would address the above concerns and make the policy justified, effective and in line with the NPPF and the London Plan, with new text highlighted and deletions struck through. We would appreciate the opportunity to discuss this, and the comments set out in this letter to explore whether there are opportunities to agree a way forward and potentially set out any agreement in a statement of common ground.</p> <p>As set out above, from 1st December 2024, the LLDC will cease to be an LPA but will continue to operate as a developer and landowner across a revised area boundary, with a significant portion of this area being within the London Borough of Newham. Therefore, any discussion and correspondence from this date will need to be with the LLDC's Development Directorate.</p> <p>In the meantime, I trust that you find the response to the Regulation 19 consultation helpful. In the first instance, if you would like to discuss this response please contact Head of Planning Policy & Infrastructure (contact details redacted) or , Team Leader Planning Policy (contact details redacted) up until 1st December 2024 or Planning Manager (contact details redacted) thereafter.</p>		Comment noted.

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Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/01	General															<p>We write on behalf of our client, the Ballymore Group, to make representations on the draft Submission Local Plan (Regulation 19 Consultation).</p> <p>As you will be aware, our client has a number of major land interests within the Borough having recently completed the delivery of the Royal Wharf development on the North Woolwich Road, the Deanston Wharf development (now known as Riverscape) which is currently under construction (to be completed in 2024). We are working with London Legacy Development Corporation (LLDC) with regards to the recently resolved to grant Stratford Waterfront development as well as the Bridgewater Triangle Site also part of the Joint Venture. Furthermore, we are working on the planning hybrid application at Thames Road Industrial Estate (also known as UNEX) which is currently being re-submitted following application ref. 21/02450/OUT submitted in 2021 (currently live, to be withdrawn), and the planning hybrid application at Knights Road, currently awaiting submission to LB Newham.</p> <p>As a result, the Ballymore Group are keen to work with the Council to assist in the formulation of new policy that supports the continued regeneration of the Borough, with a particular focus on the Royal Docks area.</p> <p>The Ballymore Group previously submitted representations in February 2024 during the Regulation 18 Consultation period, with comment responses provided by LB Newham. These responses have been noted below where relevant.</p>		Comment noted.

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Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/02	General			Viability												<p>Overall, we support the Council’s ambitions to deliver a fairer Newham and the ethos behind many of the draft policies, however, we also have concerns regarding some of the new requirements being sought through the draft Local Plan, including the cumulative impact of these requirements on the viability and deliverability of developments. The development industry is seeing a significant increase in build costs, a stagnation of residential values, and the introduction of new standards and legislation, all of which are resulting in increasingly challenging development viability across London, and we do not feel that this has been given sufficient consideration across the draft Local Plan.</p> <p>With this in mind, we offer the following comments on the draft Submission Local Plan, with a particular focus on the deliverability of the Council’s Strategic Sites.</p>		Comment noted.
Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/75	General															<p>Conclusion</p> <p>Ballymore supports the Council’s ambitions to deliver a fairer Newham and the ethos behind many of the draft policies.</p>		Comment noted.
Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/76	General			Viability of plan delivery												<p>Our main concern regarding the draft Submission Local Plan is ensuring the draft policies do not prevent the viable delivering of housing across the Borough, particularly when considering the cumulative impact of the draft policies.</p>		Comment noted.
Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/78	General			Viability of plan delivery												<p>As set out above, the development industry is seeing a significant increase in build costs, a stagnation of residential values, and the introduction of new standards and legislation, all of which are resulting in increasingly challenging development viability across London, and we do not feel that this has been given sufficient consideration across the draft Plan. When combined with additional obligations set out within the draft Plan, we have significant concerns that developments will become unviable, stagnating development across the Borough.</p>		<p>Comment noted. While the viability assessment that supports the plan shows viability challenges in meeting this target, the testing was undertaken in a particularly challenging viability context, with construction costs and interest rates being abnormally high. We consider that as economic circumstances improve, the policy will become easier to deliver over the plan period. The policy also allows for the submission of a viability assessment in circumstances where developments are unable to achieve the policy target, thereby ensuring the plan remains effective and deliverable.</p> <p>The Council is satisfied that the plan is sound.</p>
Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/79	General			Viability of plan delivery												<p>We have therefore suggested a number of amendments to the draft policies to ensure sufficient, suitable flexibility is written into the Plan so that delivery of the Council’s key priorities (such as affordable and family housing) can be prioritised in a realistic and future proofed manner.</p>		Comment noted.

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Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/81	General															We trust the above is self-explanatory in providing our comments on the draft Submission Local Plan. We would welcome the opportunity to continue to discuss the proposals with Officers as the process moves forward.		Comment noted.
Reg19-E-225	London Borough of Greenwich		Reg19-E-225/001	General							Blank	Blank						Blank	<p>Introduction</p> <p>1.1</p> <p>The Royal Borough of Greenwich (Royal Greenwich) welcomes the opportunity to comment on London Borough of Newham’s Proposed Submission consultation document. This consultation document has been prepared in accordance with Regulation 19 of the Town and Country (Local Planning) (England) Regulations 2012 and in conjunction with the strategic policies and objectives of The London Plan (The Spatial Development Strategy for Greater London, adopted March 2021). To meet the duty to co-operate requirements (as specified in the NPPF, Feb 2019, paragraphs 24 and 25), officer comments will be focused on identified strategic matters that cross administrative boundaries.</p> <p>1.2</p> <p>The below officer comments focus on relevant cross boundary issues, housing and duty to cooperate at this stage of plan preparation. As part of the duty to co-operate, we look forward to continuing working with the London Borough of Newham to ensure that the emerging Local Plan impacts positively on the wider area.</p>		Comment noted.
Reg19-E-225	London Borough of Greenwich		Reg19-E-225/002	General							Blank	Blank						Blank	<p>Statement of Common Ground</p> <p>1.3</p> <p>Royal Greenwich has received correspondence from the London Borough of Newham to begin the process of preparing a Statement of Common Ground, in line with national requirements. Royal Greenwich looks forward to collaborating with the London Borough of Newham to prepare and finalise the Statement of Common Ground. Royal Greenwich is at an earlier stage of its Local Plan preparation, having just completed a call for sites process and a first stage Issues and Options consultation in summer 2023.</p>		Comment noted.

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Reg19-E-225	London Borough of Greenwich		Reg19-E-225/013	General							Blank	Blank						Yes	<p>Conclusion 1.22</p> <p>Comments submitted for this consultation focus on matters that are likely to have an impact on the Royal Borough of Greenwich or may prejudice our planning decisions. Comments are not intended to address issues of soundness or legal compliance. Officers consider that the consultation document has been prepared in accordance with Duty to Co-operate procedures in relation to the Royal Borough of Greenwich.</p> <p>1.23</p> <p>We look forward to further collaborative working with the London Borough of Newham on strategic planning matters and have welcomed the opportunity to influence the process of developing policies within the Draft Local Plan to date. We also look forward to working with the London Borough of Newham to secure a Statement of Common Ground between the London Borough of Newham and Royal Greenwich, in line with national requirements.</p>		Comment noted.
Reg19-E-226	NHS North East London		Reg19-E-226/001	General							Blank	Blank						Blank	<p>I write on behalf of the NHS North East London Integrated Care Board (NHS NEL) in relation to the Regulation 19 Consultation that the London Borough of Newham (LBN) are currently undertaking on the Newham Draft Submission Local Plan (hereafter referred to as the Local Plan). As per Regulation 19, our comments relate to the four tests of soundness (positively prepared, justified, effective and consistent with national policy), legal compliance and duty to cooperate.</p> <p>As part of the Local Plan consultation process, NHS NEL have been committed to working with the LBN Planning Policy Team to share knowledge in relation to projected population growth and infrastructure needs to support this growth. As a relatively new organisation we look forward to strengthening this relationship over the coming years. Our response structure will consist of general comments, comments in relation to the evidence base and policy specific comments.</p>		Comment noted.

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Reg19-E-226	NHS North East London		Reg19-E-226/007	General							Blank	Blank						Blank	Whilst NHS NEL appreciate that this is not related to the Local Plan Regulation 19 consultation, we would like to take the opportunity to request that NHS NEL are consulted on all major residential planning applications. At present we appear to have been removed from the consultation list. If colleagues in Development Management could be made aware of this, it would be most appreciated.		Comment noted. This comment has been subject to further discussion with NHS NEL, on behalf of NHS bodies in Newham, and a satisfactory resolution regarding future engagement has been found. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report.
Reg19-E-226	NHS North East London		Reg19-E-226/009	General							Blank	Blank						Blank	Inclusion of LBN Public Health Documents within Evidence Base NHS NEL welcome references throughout the Local Plan to the 50 Steps to a Healthier Newham (Newham Health and Wellbeing Strategy 2024-2027) and Well Newham 50 Steps to a Healthier Borough Part 2: The Evidence for Action however these documents do not seem to have been included within the publicly available evidence base documents on this link: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh/4	We trust that they will included within the evidence base that is submitted for examination.	Comment noted. This comment has been subject to further discussion with NHS NEL, on behalf of NHS bodies in Newham, and a satisfactory resolution regarding publishing the wider evidence base has been found. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report.
Reg19-E-226	NHS North East London		Reg19-E-226/014	General							Blank	Blank						Blank	Future engagement Please do not hesitate to contact me should you have any queries regarding any aspect of this letter. We hope that our comments will be taken into account and look forward to continuing to work with you to secure high quality health care infrastructure for the London Borough of Newham and also contribute to reducing social inequality within the borough through preventative measures.		Comment noted.
Reg19-E-227	Usman Umarji		Reg19-E-227/01	General							No	No							NewHam Council proposal is biased and they have not discussed with the concern community. This Plan is unnecessary. [originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward general]	Concerned community has their plans for development ,Newham Council has to connect with them before making any proposal.	Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note national legislation requires the Council to refresh their Local Plan every 5 years.

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Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/001	General															<p>Representations to the Regulation 19 Proposed Submission Document Consultation of the Newham Local Plan Review.</p> <p>On behalf of Dominus Stratford Limited (hereinafter ‘the Client’), Knight Frank hereby submit representations in respect of the Regulation 19 Consultation on the Newham Local Plan Proposed Submission Document (dated June 2024), which is running from 19th July 2024 to 20th September 2024.</p> <p>The Client has a major land interest in the borough as owners of 302-312 High Street, Stratford, London, E15 1AJ (hereinafter ‘the Site’).</p> <p>The Site is located within the London Legacy Development Corporation (‘LLDC’) which serves as the Local Planning Authority (‘LPA’) until 30th November 2024 after which the LPA will be the LB Newham. Under the LLDC’s Transition of Power Arrangements the LLDC Local Plan will remain the relevant Local Plan until the policies are superseded by those contained within a new Newham Local Plan. Therefore, the Site will be affected by the new policies and allocations contained within the emerging new Newham Local Plan, and our Client would like to influence these as far as possible.</p>		Comment noted.
Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/002	General								No							<p>The Client supports the preparation of the Newham Local Plan Review however, it is considered that a number of the policies are not sound. Within this representation we provide comments on a range of draft policies and consider these against the tests of soundness, and where necessary, make specific reference to our Client’s Site. Specifically we comment on policies:</p> <ul style="list-style-type: none">• Policy BFN1: Spatial Strategy;• Policy BFN3: Social Value and Health Impact Assessment - delivering social value, health and wellbeing;• Policy D1: Design Standards;• Policy D2: Public Realm Net Gain;• Policy D3: Design-led Site Capacity Optimisation;• Policy D4: Tall Buildings;• Homes Chapter Introduction;• Policy H8: Purpose Built Student Accommodation; and• Stratford and Maryland Neighbourhood		Comment noted.

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Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/003	General															<p>The Site and Background</p> <p>Our Client owns 302-312 High Street, Stratford which is located on the northern side of Stratford High Street (A118) and immediately adjacent to the south-western boundary of Stratford Metropolitan Centre.</p> <p>The Site comprises a crescent-shaped parcel of land which is occupied by hardstanding and a series of 2-3no. storey buildings comprising several former commercial buildings (use class E); and a public house (Sui Generis) with 3no. residential units (use class C3) at the upper floors. It should be noted that all buildings are in a poor/declining state of repair and all buildings are currently vacant.</p> <p>The Site comprises previously developed and underutilised land in a highly sustainable location with Public Transport Accessibility Level ('PTAL') 6b which is considered 'excellent'.</p> <p>As per the adopted LLDC Local Plan (2020) the Site is located within the Lower Lea Valley Opportunity Area; Stratford High Street Policy Area; and the Greater Carpenters District Site Allocation.</p> <p>The Client secured full planning permission at the Site in May 2023 for a part 12, part 25 storey building comprising 465 student accommodation rooms, 786sqm workspace (Class E), a new public house consisting of 141sqm (Sui Generis) (LLDC ref. 22/00098/FUL).</p> <p>The permission is not deliverable, primarily due to changes in market conditions significantly increasing build costs, and fire safety regulatory changes meaning the extant permission requires significant reconfigurations to ensure compliance. As such a new planning application was submitted in December 2023 for a part-12, part-34 storey building comprising 700 student accommodation rooms, 801sqm workspace (Class E), a new public house consisting of 177sqm (Sui Generis) (LLDC ref. 23/00456/FUL).</p> <p>The Client continues to pursue this proposal which is to be determined at Appeal in Q1 2025.</p>		Comment noted.

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Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/005	General															It is in this context that our Client submits this representation. Our Client wishes to ensure that the Newham Local Plan, which will shape the future of the Borough and the regeneration of the Site, is positively worded, robust, flexible, and capable of ensuring that this previously developed and highly accessible site can be optimised. Furthermore, our Client has many development sites across London and the UK, and would like to continue to invest into LB Newham, they therefore have an interest in ensuring that planning policy for the Borough is positively worded so as to enable viable development to come forward across the Borough.		Comment noted.
Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/006	General															Regulation 19 Proposed Submission Document Paragraph 35 of the National Planning Policy Framework ('NPPF') which the Local Plan will be considered against requires that any Plan submitted to the Secretary of State for Examination must be capable of being found both legally compliant and sound. This places various duties on the Council including, but not limited to, ensuring the Plan is: <ul style="list-style-type: none">• Positively prepared – seeking to meet objectively assessed needs, including unmet needs from neighbouring areas where it is practical to do so;• Justified – an appropriate strategy, taking into account the reasonable alternatives, based on proportionate evidence;• Effective – deliverable over its period and based on effective joint working on cross-boundary strategic matters; and• Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the Framework. If the Newham Local Plan Proposed Submission Document fails to accord with any of the above requirements, it is incapable of complying with the NPPF, which as a result of Section 19 of the Planning and Compulsory Act 2004, is a legal requirement.		Comment noted.
Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/074	General															Conclusion Dominus Stratford Limited support the preparation of the new Newham Local Plan and broadly agree with the objectives and aspirations set out within the Regulation 19 Proposed Submission Document. In particular, the Client supports the identification of Stratford as a location for directing significant levels of growth.		Comment noted.

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Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/077	General							No	No							It is considered that in its current form the draft Local Plan would not be legally compliant or sound and the Client suggest that the Council review a number of the policies discussed above. Should you have any queries or require further information at this stage, please feel free to contact (contact details redacted) .		Comment noted.
Reg19-E-231	IDM Properties LLP	Iceni Projects	Reg19-E-231/001	General							Yes	No						Yes	We write on behalf of our client, IDM Properties LLP (IDM), to submit a representation to the London Borough of Newham (LBN) in relation to their emerging Local Plan, which is at the final stages of Examination, with the Regulation 19 Consultation ending 20th September 2024.		Comment noted.
Reg19-E-231	IDM Properties LLP	Iceni Projects	Reg19-E-231/018	General							Yes	No						Yes	[Conclusion] Should you wish to discuss the contents of this letter, please do not hesitate to contact either (contact details redacted)		Comment noted.
Reg19-E-232	Mohammed Khankara		Reg19-E-232/01	General							No	No						No	The consultation procedure documents are too complex for many in our community to navigate while there has been no engagement with the community's faith users of this site [originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward general]	I believe that as the land was bought by the community, it is only appropriate that land use and development authority is given to the owner. Your text here 4	Comment noted. Thank you for your feedback. The consultation response form is a template from central government and follows statutory requirements for this Regulation 19 consultation. As a result we cannot simplify the response forms, however we provided resources such as the Regulation 19 Consultation Guidance, the online information session and in-person drop-in sessions across the borough to help inform residents with the consultation requirements and assist in submitting a response. We also held a specific consultation event with Newham's Inter-Faith Forum to discuss issues of interest to Newham's faith organisations.

[illegible]

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																			RAD into a new mixed-use employment hub. Potential uses include: light industrial, workspace, education, logistics, sport and leisure uses, alongside a variety of affordable and private residential accommodation, which includes PBSA.		
Reg19-E-233	RAD CHP Ltd	CBRE	Reg19-E-233/002	General							Blank	No						Blank	Comments RAD CHP Ltd. is submitting representations to the third consultation on the emerging new Local Plan as landowner of a strategic site and as an investor, committed to the future borough. These representations have been discussed with the GLA Royal Docks team.		Comment noted.
Reg19-E-233	RAD CHP Ltd	CBRE	Reg19-E-233/015	General							Blank	No						Blank	General Comments As a general comment, the emerging Local Plan references a number of new planning application requirements, such as a ‘Public Realm Management Plan’. It is requested that for the avoidance of doubt and to avoid any delays with validation of planning applications, the Planning Applications Requirements (April 2024) is updated accordingly and published alongside the new Local Plan.		Comment noted. The Planning Applications Requirements will be updated once the emerging Plan has been adopted.
Reg19-E-233	RAD CHP Ltd	CBRE	Reg19-E-233/016	General							Blank	No						Blank	Overall, RAD CHP Ltd. support the vision for the Royal Docks area, and the clear recognition this is an area undergoing significant transformation.		Comment noted.
Reg19-E-233	RAD CHP Ltd	CBRE	Reg19-E-233/023	General							Blank	No						Blank	RAD CHP Ltd. would welcome continued engagement on the emerging new Local Plan and continue to engage positively with LBN and the Royal Docks team on their vision to transform and overcome the challenges of sustained under-occupancy of the existing buildings at RAD.		Comment noted.

[illegible]

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																			<div>• Policy BFN4: Developer contributions and infrastructure</div> <div>We attach a copy of our [Montagu Evans report] which provides a townscape study and tall building zone assessment for the Limmo Peninsula site allocation (Feb 2023).</div> <div>Our views on the Newham Regulation 19 Submission draft Local Plan policies are informed by our portfolio of major development opportunities across London and commercial and community assets.</div> <div>We trust that the enclosed is in order. Please do not hesitate to contact me on the details provided if you wish to discuss any of the content.</div>		
Reg19-E-235	Ahasannur Rahman		Reg19-E-235/01	General							No	No						No	The Local Plan fails to comply with the duty to cooperate.	I therefore as a member of the community urge you to engage with community faith leaders such as those of the existing premises as well as the honourable landowner. Your text here 5	Comment noted. The Duty to Cooperate is the obligation to engage on strategic matters with other Local Planning Authorities and prescribed bodies as part of the Localism Act 2011. The prescribed bodies are set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. The Council considers that we have fulfilled this requirement and our approach is set out in our Duty to Cooperate Report which is published on the Council's website.

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Reg19-E-236	Friends of Queen's Market		Reg19-E-236/002	General															<div>Introduction</div> <div>Friends of Queen’s Market is a local voluntary group established for 22 years whose aim is to protect and support Queen’s Market, as reflected in our community charter. This response to the Plan focuses on Queen’s Market.</div> <div>The special and important attributes of Queen’s Market are its provision of genuinely affordable, fresh food, cloth, clothes and other goods relied on by many thousands of Newham’s residents and from further afield, from many ethnic backgrounds, as well as its role as a community space that is beneficial for social wellbeing and mixing. It is rare as a covered market and its shops and kiosks inside are integral to the market in conjunction with the stalls.</div> <div>In the Plan’s introduction the Mayor reminds us:</div> <div>Nearly three quarters (72 per cent) of our residents are from Black, Asian and ethnically diverse communities.</div> <div>And she refers to Newham’s Corporate Plan for building A Fairer Newham, which sets out the general situation:</div> <div>Over a quarter of our neighbourhoods are in the 20% of most deprived neighbourhoods in the country. Over a quarter of our residents are paid below the London Living wage. After housing costs, almost half of our residents live in poverty. Our average rents represent 65% of average wages compared to 30% across the UK. This situation will be exacerbated by the cost of living emergency. It will disproportionately hit Newham residents because of embedded structural inequalities we face. This crisis will worsen existing challenges such as in-work poverty, low disposal income and high housing costs.</div> <div>The service provided by Queen’s Market is vitally important in this context.</div>	Comment noted.	
Reg19-E-236	Friends of Queen's Market		Reg19-E-236/005	General															<div>A note on Friends of Queens Market and the Local Plan:</div> <div>Friends of Queen’s Market took part in the 2012 Local Plan Examination (where the inspector commended the market as ‘vibrant and vital’ and ‘far from irreparable’). In 2017 we wrote on the Issues and Options and we wanted to speak on the “Queen’s Market Amendment” but the inspector denied us the chance, on advice from the council, despite us not having been informed of deadlines by the council. In 2021 we submitted a response to the SCI and following that to the new Local Plan regulation 18.</div>	Comment noted.	

Reg19-E-236	Friends of Queen's Market		Reg19-E-236/006	General													<p>1. Queen’s Market conforms with key policies and aims, as follows: A) Newham Markets Strategy and Policy Review by The Retail Group was commissioned by the council in 2020. Newham has only two large market places, Stratford and Queen’s Market, which were the main subjects of the Review. Note the final report has not been shown on the ‘co-create’ website. Here the Review explains how Newham’s markets support of a raft of policies. “The following Borough wide Policy and Strategies have been reviewed:</p> <p>Towards a better Newham ‘An economy that works for our residents and delivers a place where communities share the benefits, no matter their background’. All 8 pillars can be supported by the markets, their offer, delivery and interaction with borough residents.</p> <p>Community Wealth Building ‘An approach to economic regeneration, which focuses on enabling measures that support communities to create wealth and retain more of the benefits of economic growth emerging locally’. At least 7 policy / outcomes are able to be supported / delivered / implemented by markets and the offer, operations and community connection</p> <p>Well Newham 50 Steps to a Healthier Borough Health and Wellbeing Strategy 2020-2023 ‘Improving the health of every individual within the Newham community is more important than it ever has been’. At least 3 policy / outcomes are fully supported by markets.</p> <p>Newham’s markets have an essential role to play in delivering the wider aspirations and achieving the Council’s vision for local communities, community wealth building, improving the health and wellbeing of residents and providing lifelong opportunities for existing and future residents of the Borough. Indeed, this principle is a central building block for the future Markets Vision and Strategy that follows.”</p> <p>Note: Other markets operated by Newham Council are: Pilgrims Way (2 stalls, according to the above Review) Kelland Road (8 pitches) Markets operated privately: Woodgrange Market (Saturdays only) Rathbone Market (was previously run by Newham. Following redevelopment of the site there are now very few stalls, no manager, non-standard hours, no fruit and veg)</p>	Comment noted.
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Reg19-E-236	Friends of Queen's Market		Reg19-E-236/008	General															<p>[1. Queen’s Market conforms with key policies and aims, as follows:]</p> <p>C) Newham Character Study (2018) sets out the character of the market and Green Street:</p> <p>Page 99 Retail development/high streets: traditional, markets, shopping centres (malls) and ‘out of town’</p> <p>Markets:</p> <ul style="list-style-type: none">- Strong community focus, adds vibrancy, colour and variety to urban town centres making them a focus for visitors- Specialist markets attract a wider catchment which also benefits the surrounding town centre- Widens the range of goods that might otherwise be available in the town centre- Supports businesses in immediate vicinity that provide a service to market traders and the public.- High quality or ‘famous’ markets attract a visitor economy- Small-scale employment opportunities- Low cost goods available due to low rents.- Stimulates fledgling businesses: an opportunity for new traders to test the market for new products and services <p>Page 178 Key locations for the community (meeting places, local shopping parades, parks, and so on</p> <ul style="list-style-type: none">- Priory Park- Specialist Asian shopping/leisure destination- Queens Market- Various community centres across the area, including youth clubs- Various pubs (e.g. The Queens, The Duke of Edinburgh, The Boleyn)- Green Street Local Service Centre/ Library- Various churches, Islamic centres and temples, and schools. <p>Strengths</p> <ul style="list-style-type: none">- Asian identity of town centre. Green Street is an international retail destination for Asian clothing, jewellery and accessories, particularly wedding related items.- Also includes Queens Market, an important retail and community space, and other key retail clusters. <p>Page 180 Areas of sensitivity to change</p> <ul style="list-style-type: none">- Cultural sensitivity of schemes on Green Street, given its London-wide draw for Asian shoppers and also attractions for international visitors.- Other important locations for the community (as identified above)		Comment noted.

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Reg19-E-236	Friends of Queen's Market		Reg19-E-236/009	General															[1. Queen’s Market conforms with key policies and aims, as follows:] D) Newham Characterisation Study 2024 - Vision neighbourhood principles on pages 250-51 state: ‘The Queen’s Market was specifically noted as a key asset through the engagement process. “I visit three times a week. It is important for socialisation (...) It is essential to my household’s wellbeing because I buy fruit and veg there at the most affordable prices in Newham” according to public engagement findings. ‘Socioeconomic and cultural significance: a focal point highlighted by the local community is Queens Rd Market. ‘The transform area at Upton station should be mindful of the area’s significance for the local community. The area includes the Queens Market, which is very appreciated by the local community.’		Comment noted.

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Reg19-E-236	Friends of Queen's Market		Reg19-E-236/010	General															<div><div>[1. Queen’s Market conforms with key policies and aims, as follows:]</div><div>E) The Report by Leeds University, Markets4People (2020) is a detailed survey of the Market’s community value, involving in-depth interviews with 500 market users as well as with management and members of the Council and the Mayor. The authors submitted the report to the Council and its findings have been cited (for example in the council’s 2020 ‘commission brief’ for the procurement process for the Queen’s Market and Hamara Ghar Investment Strategy, then called the ‘Capacity and Viability Study, mentioned in our introduction above). https://trmcommunityvalue.leeds.ac.uk/wp-content/uploads/sites/36/2021/06/210531-M4P-Queens-FINAL.pdf</div><div>From the summary:</div><div>The research involved a survey of 500 market users (capturing a representative sample in terms of age, gender and ethnicity), two focus groups with selected user groups and around 10 interviews with key local actors, to contextualise the findings.</div><div>Queen’s Market is particularly important to Asian and Black ethnic groups, migrants, people on low incomes and older people. Thirty-one percent of market users identify as Asian/Asian British (Indian), 25% Asian/Asian British (Pakistani/Bangladeshi) and 27% Black/Black British. The majority of market users were not born in the UK; 46% have lived in the UK more than 25 years. Sixty-nine percent are over 50 years old and 70% are women.</div><div>Queen’s Market is a highly successful shopping destination of choice, specialising in quality and affordable fresh foods, clothing and textiles. The vast majority of market users do at least half of their food shopping at Queen’s Market, with 21% doing all their food shopping at the market. It also drives footfall and spend in the wider town centre: 89% of users said Queen’s Market was their main reason for visiting Green Street that day. Queen’s Market is a social, welcoming and supportive community asset. Ninety-two percent of market users strongly agree or agree that it is a community hub. Queen’s Market is more important to market users than other community facilities (e.g. libraries, parks) and other retail and food outlets.</div></div>	Comment noted.	

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Reg19-E-236	Friends of Queen's Market		Reg19-E-236/011	General															[1. Queen’s Market conforms with key policies and aims, as follows:] F) The Market was listed as an Asset of Community Value in 2015.		Comment noted.
Reg19-E-236	Friends of Queen's Market		Reg19-E-236/012	General															[1. Queen’s Market conforms with key policies and aims, as follows:] G) The GLA report (PDU 1080 01) on the previous planning application for the Market (08/00894/FUL), linked the provision of affordable food to rent levels and specifically to black and ethnic minority businesses. The report stated at para 64: Policy 3B.I of the London Plan requires that the spatial needs of small and medium sized enterprises (SMEs), and black and minority ethnic businesses be addressed... The Agency therefore welcomes the discussions between the applicant and market traders to agree rent levels... Rent levels should allow existing businesses to trade without proving unviable or requiring substantial costs to be passed onto the consumer. London’s Food Strategy states that wide inequalities exist in terms of the proportion of family spending on food, where food spending for high income households accounts for 6% of total spending compared with 26% for low income households...Affordability should also consider the service charges. As set out in the Economic Development Strategy, a major issue for SMEs is the availability of affordable premises.		Comment noted.
Reg19-E-236	Friends of Queen's Market		Reg19-E-236/026	General							Blank	No						Blank		[5. Locations for remedies] And References to the appearance of the market throughout the Plan need to be corrected and updated	The Council considers that the Plan is positively prepared and based on proportionate and effective evidence. However, the Council recognises the importance of ensuring the Plan is factually accurate and has therefore made the following wording change to Policy N14.4 to recognise that Good Growth funding has already delivered improvements to the toilets block, which is included in the modifications table. While we recognise that improvements are also being delivered to the public realm and facilities of the market, we believe that retaining the references in the policy is important in order for further enhancements to be delivered as and when development comes forward, in alignment with policy HS4. 4. protecting and enhancing the role of Queen’s Market by: a. requiring improvements to the public realm, toilets and market facilities;

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Reg19-E-237	Abdullah Waza		Reg19-E-237/04	General																Our community is eager to collaborate with landowners and authorities to develop a new facility that genuinely meets our needs, fostering partnerships that benefit all stakeholders.	Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note that the Local Plan sets out expectations for how landowners should engage with local residents in advance of and during the submission for any planning application. Please see policy BFN2 in the Submission Local Plan.
Reg19-E-238	Environment Agency		Reg19-E-238/001	General								No							Thank you for consulting us on the Newham Draft Submission Local Plan on 19 July 2024. Based on a review of the draft local plan, and the submitted evidence base, we find the submission unsound.		Comment noted.
Reg19-E-238	Environment Agency		Reg19-E-238/008	General															Draft local plan policies Please see our comments on the policies within the draft Local Plan regulation 19 submission, below.		Comment noted.
Reg19-E-238	Environment Agency		Reg19-E-238/075	General				IIA											Integrated Impact Assessment In our Reg 18 response regarding section 3.20 on Water quality we said that ‘we recommend reference is made to the Water Framework Directive (WFD). The status of Newham’s main rivers should be considered in reference to the current WFD management cycle’. We are pleased to see the addition of ‘Water quality in Newham’s three rivers – the Thames, Lea and Roding – has improved dramatically over the last 50 years, assisted by the decline in heavy industry - however data from the Environment Agency show that river quality has not improved in recent years. All in land waterbodies are protected under the Water Framework Directive not just main rivers. Of the three rivers in Newham, the Lea is noted to have the worst overall water quality, with the EA 2019 assessment rating it ‘Bad’. The Thames and the Roding May 2024 Doc Ref. 62281192_P01.01 Page 57 are both rated ‘Moderate,’ however neither river has improved its overall rating in the last 6 years.		Comment noted.

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Reg19-E-238	Environment Agency		Reg19-E-238/076	General				IIA											In our Reg 18 response regarding section 2.23 on water use we said that ‘it should be noted that Newham is located in an area of serious water stress, as identified by the Environment Agency’s Water stressed areas - final classification. We recommend that water resources are more clearly be identified in the Local Plan as a challenge and opportunity’. We note that more detail has now been provided including future water needs.		Comment noted.
Reg19-E-238	Environment Agency		Reg19-E-238/077	General				IIA											In our Reg 18 response regarding section 3.26 on Contaminated Land we said that ‘LBN’s Contamination Land Strategy was published in 2003. The IIA should consider whether this evidence base is still up-to-date and whether additional research is needed to better understand Newham’s environmental constraints. It doesn’t look like there is any discussion regarding this however we note that a newer strategy titled ‘London Borough of Newham: Contaminated Land Strategy (2023)’ was referenced under policy CE1 however the 2003 version is still being referenced in section 3.26 of the document titled ‘Newham Local Plan (Regulation 19) – Integrated Impact Assessment (Final Report)’ prepared by WSP (dated: MAY 2024, ref: 62281192_P01.01).		These modifications will be made to the IIA.
Reg19-E-238	Environment Agency		Reg19-E-238/078	General				IIA											In our Reg 18 response regarding section 3.27 on Flood Risk we said that ‘there are locations within the borough that are within flood zones and are not within areas that benefit from flood defences’. However the updated report referenced above still states that ‘Thanks to formal flood defences (including the Thames Barrier) all properties in the borough are protected from tidal and fluvial flooding. This statement is incorrect as there are residential properties in undefended areas.We also said that this section should reference the risk of flooding from groundwater however it doesn’t look like this has been done.		These modifications will be made to the IIA.
Reg19-E-238	Environment Agency		Reg19-E-238/079	General				IIA											We note that the changes we recommended to 3.30 Key Sustainability Issues have been made.		Comment noted.
Reg19-E-238	Environment Agency		Reg19-E-238/080	General				IIA											With regards to the Table 4.1 Sustainability Objectives we recommended that SO13 should be expanded to include groundwater vulnerability. The wording we suggested was ‘mitigation of adverse effects on contaminated land on human health and controlled waters’. However it does appear that this has been taken onboard.		Comment noted.

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Reg19-E-239	Tate & Lyle Sugars		Reg19-E-239/001	General							Blank	Blank						Blank	<p>About Tate & Lyle Sugars in Newham</p> <p>We operate two linked manufacturing sites in the London Borough of Newham (LBN) employing approximately 800 people. The two sites are located approximately one mile apart, with the most of the journey between the two being carried out along North Woolwich Way. Tate & Lyle Sugars (TLS), like many other businesses in Newham has a viable future at its existing sites in the Royal Docks. We have no plans to move from these sites.</p> <p>1. Thames Refinery, Factory Road, Silvertown, London E16 2EW 2. Plaistow Wharf, Knights Road, Silvertown, London E16 2AT</p> <p>Tate & Lyle Sugars started refining sugar at Thames Refinery in Silvertown, East London, in 1878.</p> <p>Thames Refinery is the largest cane refinery in Europe and can produce around 8% of all European sugar demand/50% of UK sugar demand, when able to run at capacity. Thames Refinery and contiguous land owned by Tate & Lyle Sugars forms a site of nearly 50 acres in size straddling the area between Factory Road and the River Thames, as far East as the EMR Metal Recycling site. It forms the vast majority of the Thameside East SIL and shares a boundary with SA3 Connaught Riverside site allocation. We make extensive use of public transport, the road network and the River Thames to transport raw materials, finished products and staff to and from both sites.</p> <p>Our Plaistow Wharf factory, located on Knights Road, has been in operation since 1881 when Abram Lyle established the business and produces the iconic Lyle’s Golden Syrup. Since 2012 we have invested over £20 million in a new syrup production line, 9 new packing lines and other upgrades to the Plaistow Wharf factory, more than doubling the number of jobs to over 100. It is the most profitable site in our global group. It is part of the Thameside West SIL and borders the N3.SA2 Lyle Park West.</p>		Comment noted.

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Reg19-E-239	Tate & Lyle Sugars		Reg19-E-239/002	General							Blank	No						Blank	<p>General Response</p> <p>We believe that there have been a number of sensible positive amendments made to the draft Local Plan since the Regulation 18 version was published. We are broadly supportive of the plan.</p> <p>We believe that there are some smaller amendments around strategic sites and Agent of Change that are worthwhile and justified by National or London level planning policy.</p> <p>We provided a detailed and very extensive representation to the Regulation 18 version of the draft Local Plan. For brevity we have sort to avoid simply reiterating large sections of the previous response, and focused on giving new or additional information or commentary where it is necessary.</p> <p>It is presumed that the reader of this document is familiar with our previous Regulation 18 representation. It is placed in an appendix at the end of document for easy reference, if that is not the case. [see Appendix 1 at p. 8]</p>		Comment noted.
Reg19-E-239	Tate & Lyle Sugars		Reg19-E-239/012	General							Blank	Blank						Blank	<p>Conclusion</p> <p>We hope our submission is helpful and provides both evidence and context to support the plan making process. Please feel free to contact us for further information or clarification.</p>		Comment noted.

[illegible]

LB Newham Response																	Proposed modifications and explanation
Representor Comment																	of 65, helping to tackle social isolation and form new friendships and connect with the club. Moreover, with mental health issues increasing because of the pandemic, West Ham United led efforts to partner the NHS with the charitable arms of football clubs across the country and develop the Advantage mentoring programme. As well as increasing access to NHS Child and Adolescent Mental Health Services (CAMHS), the programme offers young people aged 14-21 the chance to informally connect with mentors in their community to re-establish their aspirations. Following the success of the scheme since launch, Advantage is now registered as a community interest company (CIC) and is being delivered nationally in collaboration with the NHS and clubs across the Premier and English Football League. Beyond the direct delivery across the local community, the football club also helps raise the profile of the local area and Newham as a whole and is keen to both continue and expand its work with the Council and local groups. The club brings significant business and other socio-economic benefits to the local area, including local jobs both directly and indirectly. Independent analysis has revealed that WHUFC has contributed over £300million in GVA to the club's local economy of London and Essex, as well as supporting more than 3,300 local and regional jobs.
Complies with Duty to Cooperate?																	
Consistent with the London Plan?																	
Consistent with the NPPF?																	
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Reg19-E-240	West Ham United Football Club	PMV Planning	Reg19-E-240/003	General							Blank	Blank							<p>Representations made at Regulation 18 Stage</p> <p>We submitted representations on behalf of WHUFC in February 2023 to the Regulation 18 version of the draft Newham Local Plan. In those representations we noted all the above and the importance of the Club to the local community and the Newham economy.</p> <p>Our representations encouraged the Council to recognise this in the draft Local Plan, but our comments do not appear to have been taken on board. Therefore, we would like to reiterate that the Local Plan should recognise the role the club plays in the local community. Our previous representations are appended for completeness.</p> <p>LLDC powers are being handed back to the Council in December 2024 and in advance of this the Club is keen to work together, to invest further in the local area, whether this through enhanced community work; ensuring the London Stadium is used to its full potential; the creation of additional related facilities in and around the stadium; and the continued regeneration of the land as part of the Olympic Legacy to which the Club remains fully committed.</p> <p>Representations to the Regulation 19 Consultation</p> <p>Instead of restating our submission from February 2023 these representations focus on relevant updates and policies that have changed between the Regulation 19 version and the Regulation 18 version of the plan and which are of most interest to WHUFC, specifically in relation to the London Stadium.</p>		Comment noted. More detailed responses have been provided in relation to your specific representations.
Reg19-E-240	West Ham United Football Club	PMV Planning	Reg19-E-240/008	General															<p>We look forward to progressing a dialogue with the council and wish to be kept informed of any further consultations on the Local Plan and subsequent Examination.</p>		Comment noted.
Reg19-E-241	Hammad Ozair		Reg19-E-241/01	General								No						No	<p>NewHam Council proposal is biased and they have not discussed with the concern community. This Plan is unnecessary. [originally against SI1, SI2 and SI3, N7.SA1 Policies Map - taking forward general]</p>	Concerned community has their plans for development ,Newham Council has to connect with them before making any proposal.	Comment noted. We have engaged with community groups and residents at the Issues and Options, Regulation 18 and 19 Consultations. Please refer to our Consultation reports on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh Please note national legislation requires the Council to refresh their Local Plan every 5 years.

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Reg19-E-244	One Newham		Reg19-E-244/033	General															The design of the feedback form discourages active participation especially given the sheer volume of information presented and even larger volumes of supporting data (some of which is misleading). North Woolwich resident		Comment noted. Thank you for this feedback. The consultation response form is a template from central government and follows statutory requirements for this Regulation 19 consultation. As a result we cannot simplify the response forms, however we provided resources such as the Regulation 19 Consultation Guidance, the online information session and in-person drop-in sessions across the borough to help inform residents with the consultation requirements and assist in submitting a response. We also provided Main Changes Summary documents for each theme to outline the main changes from the previous Draft Local Plan, which we hoped would be more accessible. Unfortunately, without specific details about which parts of the supporting data are misleading, we are not able to address to this point.
Reg19-E-244	One Newham		Reg19-E-244/044	General															All of these comments are from local colleagues and residents - not our own views.		Comment noted.
Reg19-EC-003	Muhammad Uddin		Reg19-EC-003/003	Building a Fairer Newham							Yes	Yes						Yes	n/a	[I am writing to provide feedback and suggestions for the ongoing consultation of the Newham Local Plan. I commend the Council's efforts to address the diverse needs of Newham's communities, and I hope the following recommendations will further enhance the inclusivity and effectiveness of the plan.] 3. Cultural Sensitivity Training To better serve local communities, I suggest that planners and decision-makers undergo cultural sensitivity training. This training will enable them to make better and more informed decisions that reflect the diverse needs of Newham's residents, especially of less visible communities.	Comment noted. Thank you for this feedback. All Newham employees must complete a training session in Equality and Diversity as part of their induction. This training is then renewed every 2 years to keep staff up to date. In addition the Planning Service has also had bespoke training on considering the equalities duty within planning processes. However we agree that awareness of Newham's diverse population and varied needs is crucial for the work of the planning service and are committed to improving our training and processes in this regard.

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-EC-003	Muhammad Uddin		Reg19-EC-003/005	Building a Fairer Newham							Yes	Yes						Yes	n/a	<p>[I am writing to provide feedback and suggestions for the ongoing consultation of the Newham Local Plan. I commend the Council's efforts to address the diverse needs of Newham's communities, and I hope the following recommendations will further enhance the inclusivity and effectiveness of the plan.]</p> <p>5. Formation of Faith-Specific Advisory Panels</p> <p>I recommend the establishment of faith-specific advisory panels that can provide ongoing consultation with the Council. These panels would offer continuous feedback, ensuring that the needs of faith communities are consistently met throughout the implementation of the Local Plan.</p>	<p>Comment noted. Thank you for your feedback. As part of engaging on the plan we held a specific consultation event with Newham's Inter-Faith Forum to discuss issues of interest to Newham's faith organisations. Further information on our consultation can be found in our Consultation Reports for each stage on our website: https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh</p>
Reg19-EC-003	Muhammad Uddin		Reg19-EC-003/006	General							Yes	Yes						Yes	n/a	<p>[I am writing to provide feedback and suggestions for the ongoing consultation of the Newham Local Plan. I commend the Council's efforts to address the diverse needs of Newham's communities, and I hope the following recommendations will further enhance the inclusivity and effectiveness of the plan.]</p> <p>6. Enhanced Equality Impact Assessments (EQIAs)</p> <p>It is crucial that the Local Plan undergoes thorough and inclusive Equality Impact Assessments (EQIAs) to identify and address any potential inequalities. These assessments should specifically consider the unique needs of different groups, with an intersectional approach that also takes into account factors such as race, faith and socio-economic status. The results of these EQIAs should be transparently reported to the public, ensuring accountability and continuous community engagement.</p>	<p>Comment noted. A full Equalities Impact Assessment has been undertaken for the Local Plan and a version assessing the Plan at each stage was published as part of the Integrated Impact Assessment alongside each Local Plan consultation for comments.</p> <p>Planning Policy Officers have worked with the Council's Inclusion Officers to adapt the corporate EQIA process in a meaningful and appropriate way for the Local Plan. A range of data sources have been used that include data on the specific needs and challenges of specific sections of the population, including from Newham's Population Surveys and the Census 2021. We believe our approach and the outcomes of the EQIA assessment are proportionate and effective for plan-making purposes.</p>

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Reg19-EC-003	Muhammad Uddin		Reg19-EC-003/007	General							Yes	Yes						Yes	n/a	<p>[I am writing to provide feedback and suggestions for the ongoing consultation of the Newham Local Plan. I commend the Council's efforts to address the diverse needs of Newham's communities, and I hope the following recommendations will further enhance the inclusivity and effectiveness of the plan.]</p> <p>7. Regular Monitoring and Transparent Reporting</p> <p>The Council should commit to ongoing monitoring and regular reviews of the EQIAs associated with the Local Plan. This would allow for timely adjustments to policies and ensure that all communities, particularly those of diverse faith backgrounds, are being equitably served.</p>	<p>Comment noted and we agree that the detailed impact of the Local Plan will become more apparent at the development management stage, where developers apply the requirements of the Plan alongside other context related considerations to deliver a building or space with a specific use. In recognition of this, the Local Plan includes policies in the Building a Fairer Newham chapter that require developers of larger sites to undertake further engagement (BFN2) and an assessment of Social Value and HIA (BFN3). These processes as well as the impacts of other policies in the Plan will be monitored through the Local Plan monitoring framework and provide learning towards the next Local Plan review and its EqIA. The Council is satisfied that this approach is proportionate and appropriate for the local plan process and meets the Council's duties under the Equalities Act.</p>
Reg19-EC-003	Muhammad Uddin		Reg19-EC-003/009	General							Yes	Yes						Yes	n/a	<p>I believe that incorporating these suggestions will significantly enhance the Newham Local Plan, making it more inclusive, equitable, and responsive to the needs of all residents, particularly those from diverse backgrounds.</p>	<p>Comment noted</p>