

# Newham Local Plan Refresh Regulation 22 Consultation Statement

## Our Newham Local Plan



**DRAFT SUBMISSION LOCAL PLAN (REGULATION 19) June 2024**

[newham.gov.uk](https://newham.gov.uk)

**WE ARE NEWHAM.**

## Contents

Executive Summary .....	3
1 Introduction .....	5
1.1 Purpose .....	5
1.2 Background .....	5
1.3 Structure of Statement .....	6
2 Plan Production Timeline .....	7
2.1 The Key Local Plan Stages Undertaken: .....	7
3 Statutory Consultation and Summary of Main Issues .....	10
3.1 Regulation 18 Consultation and Main Issues raised pursuant to Regulation 18 .....	10
3.2 Main Issues raised pursuant to Regulation 19/20 .....	11
Appendix 1: Regulation 18 - Consultation overview, methods, processes and evidence .....	13
3.3 Summary of responses.....	13
3.4 Regulation 18 Consultation and Engagement activities .....	100
3.5 Who Responded.....	115
3.6 Schedules 1-7 .....	128
Appendix 2: Regulation 19 - Consultation overview, methods, processes and evidence .....	136
3.7 Summary of responses.....	136
3.8 Regulation 19 Consultation and Engagement activities .....	325
3.9 Overview of Consultation Responses .....	341
3.10 Schedules 8-17 .....	354

## Executive Summary

The London Borough of Newham is preparing a Local Plan Refresh to shape, plan, and manage growth, regeneration, and development across the borough up to 2038. As part of the Local Plan Refresh process, the Planning Policy Team has conducted three rounds of public engagement: the Issues and Options (2021), the Draft Local Plan (Regulation 18) (2023), and the Draft Submission Local Plan (Regulation 19) (2024).

This Consultation Statement sets out how the Council has involved residents and key stakeholders in preparing the Newham Submission Local Plan in accordance with Regulations 18 and 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Regulation 18 refers to preparation of a local plan (including consultation on the subject of that plan), Regulation 19 refers to publication of a local plan and Regulation 20 refers to representations relating to a local plan.

Regulation 22 (1)(c) requires a statement setting out:

- i. which bodies and persons the local planning authority invited to make representations under regulation 18;
- ii. how those bodies and persons were invited to make representations under regulation 18;
- iii. a summary of the main issues raised by the representations made pursuant to regulation 18;
- iv. how any representations made pursuant to regulation 18 have been taken into account;
- v. if representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations; and
- vi. if no representations were made in regulation 20, that no such representations were made;

This statement meets Regulation 22 (1)(c) and demonstrates that the consultation on the preparation of the Local Plan has been undertaken in accordance with the relevant Regulations and the adopted Statement of Community Involvement (SCI).

The SCI document sets out how the Council will consult and involve the public and statutory consultees in planning matters. Full details of the current adopted SCI can be viewed [here](#).

The Regulation 19 consultation for the Draft Submission Newham Local Plan Refresh took place from 19th July to 20th September 2024. The London Borough of Newham employed a variety of consultation strategies to engage residents and stakeholders living and working in the borough. The Council notified statutory consultees, relevant organisations, and the general public, inviting them to submit comments on the proposed submission Local Plan policies and site allocations. These included general consultees that the Council was required by regulations to notify, neighbouring Local Planning Authorities, residents and businesses in the borough, and individuals who signed up to receive email alerts about the Local Plan.

Key findings from the Regulation 19 consultation is set out below, further details can be found in [Section 3.8](#) and [Appendix 2](#):

- The Regulation 19 consultation produced a total of 335 representations. These representations were processed into 3,272 comments on the different chapter themes of the Draft Submission Local Plan.
- The demographic data analysis identified the gaps in representation across six measured demographic characteristics which can be targeted at the future Local Plan consultations to improve the representation of Newham's population.
- The summary of responses outlined the main issues arising from the Regulation 19 consultation broken down into each chapter of the Local Plan some of the most prominent issues raised were on tall building zones, site allocations and affordable housing targets.



# 1 Introduction

## 1.1 Purpose

This Consultation Statement sets out how the Council has involved residents and key stakeholders and specified bodies in preparing the Newham Local Plan in accordance with Regulations 18 and 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

This statement meets Regulation 22 (1)(c) and demonstrates that consultation on the preparation of the Local Plan has been undertaken in accordance with the relevant Regulations and the [adopted Statement of Community Involvement \(SCI\) 2022](#).

The SCI document sets out how the Council will consult and involve the public and statutory consultees in planning matters.

The Council has also prepared a separate [Duty to Cooperate \(DtC\) Statement of Compliance 2024](#) which is published on the examination webpage and provides further details on specific DtC matters.

## 1.2 Background

The current Local Plan, adopted in 2018, is being updated to comply with the requirement for all Councils to maintain an up-to-date Local Plan every five years. The new Local Plan sets out a vision, objectives, spatial strategy and a planning policy framework that will shape development through to 2038. It will be used to assess planning applications and guide the decisions on:

- the location, amount and type of development to be delivered in the borough;
- the standards that development should meet;
- what it should look like
- what services and infrastructure are needed and
- where; and
- how all residents will benefit from the proposed levels of growth and development.

The Council's Proposed Submission Local Plan and supporting documents, including the Integrated Impact Assessment (Sustainability Appraisal, Equalities Impact Assessment, Health Impact Assessment, Habitats Regulation Assessment) were published in accordance with Regulation 19 for a nine week consultation period from 19th July to 20th September 2024, this consultation period exceeded the six-week statutory requirement for a Local Plan consultation.

The diverse range of stakeholders consulted included residents, statutory consultees, infrastructure providers, developers, community groups, neighbouring Local Authorities, landowners, business owners, elected officials, and Council staff. Both the Regulation 18 and Regulation 19 consultations were undertaken in alignment with the Council's Statement of Community Involvement (SCI), which outlines the methods and stakeholder groups we engaged throughout the Local Plan process.

### 1.3 Structure of Statement

This statement of consultation comprises four sections:

- Section 1 is an introduction to the statement, setting its purpose and background of the Local Plan and the consultation process.
- Section 2 sets out the process and timeline which has been followed in preparing the revised Local Plan which is in accordance with the up to date [Newham Local Development Scheme 2025](#).
- Section 3 summarises the main issues raised during the course of both the Regulation 18 and Regulation 19 consultation process and how the Council dealt with these main issues.

Section 3 is supported by two Appendices:

- Appendix 1 - provides a summary of the Regulation 18 consultations undertaken from 9th January to 20th February 2023 (see Figure 2.1) and how the comments have been taken into account by the Council in a schedule of changes made to the plan between the Regulation 18 Consultation in 2021 and the Regulation 19 draft of the local plan. [Schedules 1 – 7](#).
- Appendix 2 - addresses the requirements of Regulation 22(1)(c)(v) and sets out details of the consultation undertaken at Regulation 19 stage and a summary of the main issues raised in relation to each policy by the Regulation 20 representations alongside Council initial response in plan order. [Schedules 8 – 17](#).

## 2 Plan Production Timeline

The timetable below outlines the main stages in the preparation of Newham Local Plan up to the likely timeframe for examination and adoption which are still to be confirmed.

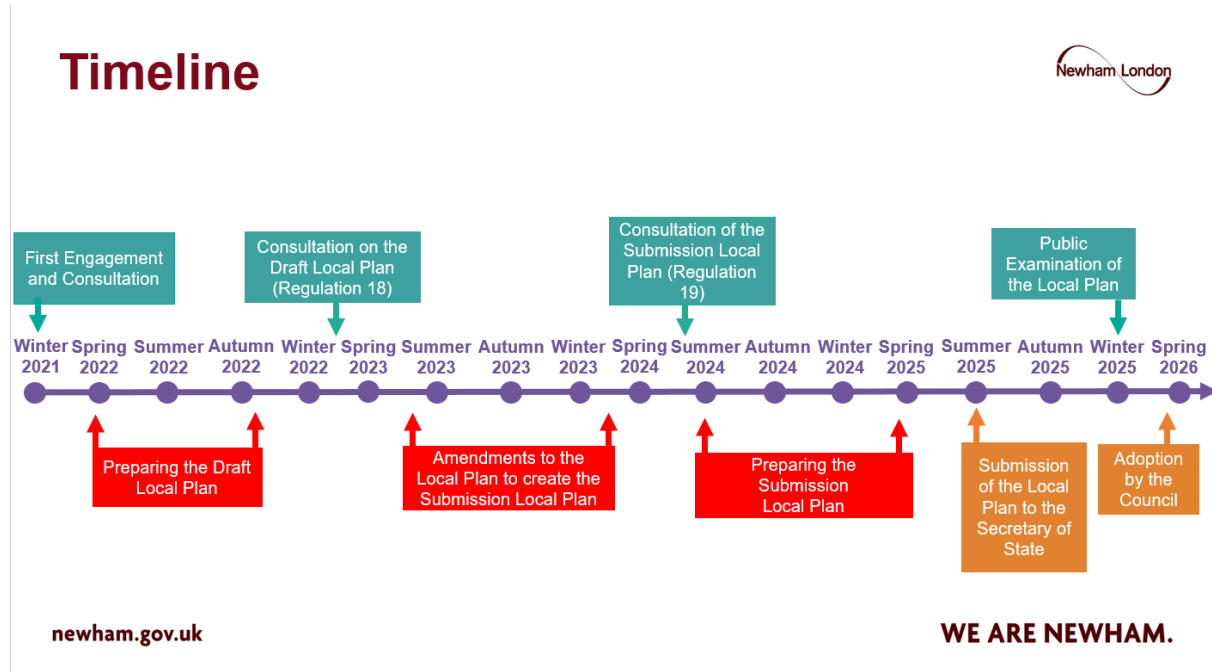


Figure 2.1 – Plan Making Process Timeline

### 2.1 The Key Local Plan Stages Undertaken:

#### 1. First Engagement- Issues and Options Consultation

The plan-making process (see Figure 2.1) began with the development of the Issues and Options document. The Issues and Options identified current issues and potential options to address such issues were suggested. This first stage Local Plan document was subject to public consultation from 18<sup>th</sup> October to 17<sup>th</sup> December 2021. The Council also consulted on the Statement of Community Involvement, the Integrated Impact Assessment Scoping Report, and carried out a Call for Sites Exercise. The consultation sought views on the Local Plan options and asked for respondents to set out their alternative ideas and the findings from this consultation informed the Draft Local Plan. Further details on the consultation process and responses can be found in the [Issues and Options Consultation Report](#)

#### 2. Consultation on the Draft Local Plan (Regulation 18):

On 6<sup>th</sup> December 2022 Cabinet approved the Draft Local Plan for consultation. This was followed by a soft launch on the 16<sup>th</sup> December 2022, providing people the opportunity to review the Local Plan and leave comments prior to the six-week consultation period. The formal consultation then took place between 9<sup>th</sup> January and 20<sup>th</sup> February 2023.

This was the first formal, statutory round of consultation, which aimed to invite a diverse range of stakeholders (including residents, statutory consultees, infrastructure providers, developers, community groups, neighbouring Local Authorities, landowners, business owners, elected officials, and Council staff) to comment on the detail of draft policies and provide feedback on what they would keep, change, or add to the policies. This six week consultation period also provided an array of engagement activities following the requirements of Newham Statement of Community Involvement, published in October 2021. Further details of the consultation process, and who was consulted, can be found in the [Regulation 18 Consultation Report](#) and are also set out in [Section 3.4](#) and [Appendix 1](#).

### **3. Consultation of the Submission Local Plan (Regulation 19)**

On the 4th June 2024, the London Borough of Newham's Cabinet recommended the approval of the Draft Submission Local Plan for consultation. The Draft Local Plan and supporting documents, including the Integrated Impact Assessment (Sustainability Appraisal, Equalities Impact Assessment, Health Impact Assessment, Habitats Regulation Assessment), were published in accordance with Regulation 19. The publishing of the Local Plan and formal consultation period did not take place until the 19th July to 20th September 2024, due to the General Election and local by-elections held in early July 2024. The consultation period was initially planned for seven weeks but was extended to nine weeks on 22nd August 2024. This was following the Government's consultation on revisions to the National Planning Policy Framework (NPPF), published on the 30th July, proposing a change to extend the submission deadline for plans progressing under the current planning regime from June 2025 to December 2026. This enabled the Council to extend the consultation period for consultees to submit responses beyond the summer holiday season.

The Council consulted specific consultation and statutory bodies, local amenity and residents' groups, businesses and individual residents in accordance with the Statement of Community Involvement through organised drop-in sessions, community events and an online informative session to answer questions from residents and other interested parties on how to respond to the consultation. The comments submitted at the previous consultation stages, alongside a comprehensive evidence base, helped to shape the Draft Submission Local Plan. The Council considers that this version of Local Plan that was published under Regulation 19 for comment is 'sound' and establishes a clear and robust strategy for the Borough. Comments were sought on the tests of soundness and legal compliance. Further details of the consultation process, and who was consulted, are set out in [Section 3.2](#) and [Appendix 2](#).

### **4. Submission to the Secretary of State**

The Council assessed the comments received under Regulation 20 in response to Regulation 19 publication and considered that the Local Plan is sound. The decision to submit the plan for Examination in Public (EiP) was taken via Full Council on 28<sup>th</sup> April 2025. The Plan will be submitted to the Secretary of State on the 18<sup>th</sup> July 2025. This Consultation Statement sets out the Council's consideration of the representations received under Regulation 20 in response to Regulation 19 publication.

## **5. Public Examination – Autumn/Winter 2025 (TBC)**

An independent Inspector(s) will hold an examination to assess whether the plan was prepared in accordance with legal and procedural requirements and whether it is 'sound', in accordance with paragraph 35 of the National Planning Policy Framework (NPPF). The Inspector(s) will consider all the evidence and representations made at each stage of the Local Plan consultation process and identify various matters, issues and questions to consider as part of the examination.

## **6. Adoption - Early Spring 2026 (TBC)**

At the end of the examination, the Inspector will send a report to Newham Council recommending whether or not they can adopt the plan. In most cases, the report will recommend some changes that are necessary to allow the plan to be adopted. The decision to adopt the Local Plan must be taken by full Council. After the decision has been made to adopt a plan, there is a 6-week period, where challenges to this decision can be made to the High Court.

## 3 Statutory Consultation and Summary of Main Issues

### 3.1 Regulation 18 Consultation and Main Issues raised pursuant to Regulation 18

The council carried out the Regulation 18 local plan public statutory consultation between 9th January and 20th February 2023 on the draft proposals. The consultation was undertaken in accordance with the procedures and standards in the council's adopted [Statement of Community Involvement \(SCI\)](#).

#### 3.1.1 Who was invited to participate?

Specific and general consultation bodies registered on the council's planning policy database were made aware of the consultation by email or letter. This included the following:

- Local community groups and organisations
- Residents
- Development industry / Landowners
- Statutory bodies
- Infrastructure and service providers

We received a total 325 representations. A representation represents a single submission by email, Co-Create, questionnaire or an in-person event where multiple people attended. An estimated 335 people attended in-person events in response to the Regulation 18 consultation. Some of these attendees may have also submitted additional representations, as they may have engaged using digital methods following the in-person events. From these representors and attendees, 8388 comments were received at this consultation stage.

#### 3.1.2 How did consultees participate?

The consultation was publicised on the council's website, and notifications were sent out to individuals and organisations registered on the council's planning policy database. The consultation document and supporting documents were made available on the website and at the council offices.

During the 6 week consultation period the Council carried out drop-in sessions, community events and community assemblies, attracting 335 attendees from across the borough. These activities drew on support and knowledge from across the council and externally to promote the draft new Local Plan. The events were an opportunity to introduce the Regulation 18 Draft Local Plan to the general public and statutory consultees and to draw on the knowledge of the public to help shape the draft Plan. Further details on who and how we carried out the engagement process is set out in [Section 3.4.1](#) of Appendix 1.

#### 3.1.3 Summary of main issues and how they informed the Plan

The level of response to Regulation 18 consultation was varied across topic areas. Table 1 in Appendix 1 ([Section 3.3](#)) is a summary of responses and the Council's response on how these responses have been addressed in the Regulation 19 Draft Submission Local Plan or why have changes not been made.

### 3.1.4 Conclusion

[Section 3.1](#) and [Appendix 1](#) explain which bodies and persons the Council invited to make representations under Regulation 18 and how they were invited to make representations, having regard to the plan-making Regulations and the Council's Statement of Community Involvement. Summaries and full reports of the main issues raised by the representations made pursuant to Regulation 18 are provided and include an explanation of how these were taken into account in the preparation of Newham Local Plan. The Council has therefore met the requirements of Regulation 22(1)(c) (i) to (iv).

## 3.2 Main Issues raised pursuant to Regulation 19/20

Consultation on the Proposed Submission Plan (Regulation 19) took place over a 9 week period from 19th July to 20th September 2024, and was carried out in accordance with the Statement of Community Involvement (SCI). Comments were invited on the Plan's legal compliance (including the Duty to Co-operate) and soundness. Guidance on how to respond to the consultation, along with a Statement of Representation Procedure were also made available.

### 3.2.1 Who was invited to participate?

Specific and general consultation bodies registered on the council's planning policy database were made aware of the consultation by email or letter. This included the following:

- Local community groups and organisations
- Residents
- Development industry / Landowners
- Statutory bodies
- Infrastructure and service providers

A total of 335 representors made up of both statutory and non-statutory consultees made representations on the Local Plan submission version, and 43 representors requested to make participation at the public examination hearings.

### 3.2.2 How did consultees participate?

The consultation was publicised on the Council's website and notifications were sent out to individuals and organisations registered on the Council's planning policy database. The consultation document and supporting documents were made available on the website and at the council offices.

As part of the statutory consultation period Newham Council also carried out community events and drop-in sessions. In the community events we discussed key issues and the requirements of the Regulation 19 consultation with community groups. The drop-in sessions invited residents to view and comment on the Draft Submission Local Plan and its evidence base, as well as supporting materials such as the Main Changes Summaries. These summaries helped attendees understand the changes from the Draft Local Plan (Regulation 18) to the Draft Submission Local Plan. Team members were available at the drop-in sessions to answer residents' questions about the Local Plan

and Regulation 19 consultation. We explained the consultation process using our Regulation 19 guidance form and the Statement of Representation Procedure, and we provided instructions for submitting valid responses online, via downloadable forms, or in hard copy. Residents could also join our mailing list for future updates. Further details on who and how we carried out the engagement process is set out in [Section 3.8](#) of Appendix 2.

### 3.2.3 Summary of main issues

The level of response to Regulation 19 consultation was varied across topic areas. Table 3 in [Section 3.7](#) of Appendix 2, details the main issues identified for each policy theme during the consultation and provides the Council's response. It also indicates whether these comments have been proposed as modifications to the Inspector(s) at examination. The modifications were also prepared as part of Statements of Common Ground to support the examination process, details can be found in the Duty to Corporate Statement.

### 3.2.4 Conclusion

[Section 3.2](#) and [Appendix 2](#) explain which bodies and persons were invited to make representations under Regulation 19 and how, in accordance with the plan-making Regulations and the Council's Statement of Community Involvement. These sections also set out the number of representations made pursuant to Regulation 20, a summary of the main issues raised in those representations, and officer response. The Council has therefore met the requirements of Regulation 22(1)(c)(v) to (vi).



## Appendix 1: Regulation 18 - Consultation overview, methods, processes and evidence

### 3.3 Summary of responses

Table 1: Summary of responses and the Council's response on how these responses have been addressed in the Regulation 19 plan or why have changes not been made

Themes and Policies	Responding to consultation representations	
	Main responses raised	Our response (How have these been addressed or why have changes not been made)
<b>Consultation Design</b>		
Consultation Design	<p><b>Design and accessibility of the plan on Co-create</b></p> <p>A number of residents said they found the platform difficult to access and provide comments, especially on the mobile site. Although, a number of residents also said the platform and consultation was well designed, making it easy to understand and submit a response.</p> <p><b>Concern that comments will be ignored</b></p> <p>A number of residents and a community group representative expressed the concern, that the council will not read, respond or incorporate comments raised in the consultation.</p> <p><b>Inclusion of marginalised communities and digitally excluded</b></p> <p>A number of residents and Councillors raised concerns regarding efforts to include the elderly, digitally excluded</p>	<p><b>Design and accessibility of the plan on Co-create</b></p> <p>We are working with the third party Co-create, who design our council engagement platform, to improve the accessibility and function of the Local Plan and response form.</p> <p><b>Concern that comments will be ignored</b></p> <p>All the comments in the consultation report will be considered and addressed, with individual responses. Please see the detailed list of representation and responses and the Issues and Options Engagement Report which provides evidence of this.</p> <p><b>Inclusion of marginalised communities and digitally excluded</b></p> <p>The consultation includes a wide range of methods to reach all of Newham's population using a combination of online and offline methods. Making sure the groups such as the elderly, digitally excluded</p>

	<p>and marginalised communities who are less likely to engage with the consultation process.</p> <p><b>No confirmation comments had been submitted or received</b> A few residents and developers raised the concern that they had received no confirmation that their comments had been submitted or received.</p> <p><b>Resident Associations not consulted</b> A resident and community group representative objected to not consulting resident associations.</p> <p><b>Community assembly times exclusionary</b> A resident object to community assemblies being held in the evening as it excludes parents, the elderly and the disabled, who may be less able to attend in the evening.</p>	<p>and marginalised communities are given the opportunity to engage with the Local Plan.</p> <p><b>No confirmation comments had been submitted or received</b> Responses provided by email receive an automatic response. However we are unable to provide this functionality using co-create.</p> <p><b>Resident Associations not consulted</b> Significant efforts were made to reach residents through community groups and representative organisations. We also encourage individuals or organisations can also signup to our planning database to ensure they are informed of planning consultations.</p> <p><b>Community assembly times exclusionary</b> At the Regulation 18 consultation we held a drop-in session in the daytime and an online informative workshop for those who could not attend the evening community assemblies. We will be holding further day time events during the regulation 19 consultation.</p>
<b>Local Plan Section 1</b>		
Introduction	<p><b>General Support</b> Residents broadly found the introduction helpful and informative. Although some residents wanted further details to be added on cleanliness, crime, greenspace and air quality.</p> <p><b>15 minute neighbourhoods</b> A number of residents expressed concerns relating to 15 minute neighbourhoods and its implementation. In particular concerns that this approach was designed to</p>	<p><b>General Support</b> Support for the section is welcomed. As the purpose of this section is to provide a general overview of the Local Plan and other sections of the plan include more details, we have not made these additions. Where suggestions are beyond the scope of the Local Plan, we have provided them to our colleagues in other departments.</p> <p><b>15 minute neighbourhoods</b> No changes have been made to the approach as the Council's commitment to delivering 15 minute neighbourhoods has been outlined in a number of documents and the whole Local Plan has been subject to detailed consultation. However further information regarding</p>

	<p>reduce freedom of movement or limit choice. There were concerns it was undemocratic and not consulted on.</p> <p><b>Clarity on the role planning regulations</b> One resident requested that further clarity be provided on when the Local Plan is required to be reviewed and the role of planning relative to other regulatory functions.</p> <p><b>Impact of Growth</b> A number of residents raised concerns regarding the impact of housing growth on access to infrastructure, including schools, health centres and parks</p>	<p>the delivery of 15 minute neighbourhoods has been added to the justification text for BFN1 to better explain that the purpose of 15 minute neighbourhood principles is to increase choice and the range of facilities residents can access. To better reflect the intentions behind this objective, this principle is now referred to as a network of well-connected neighbourhoods, in the Local Plan.</p> <p><b>Clarity on the role planning regulations</b> Changes have been made to provide further detail and clarity regarding when the Council is required to review the Plan and the role of planning relative to building control.</p> <p><b>Impact of Growth</b> No changes to this part of the Plan were made as a result of these concerns, as they are addressed in the Spatial Strategy and Developer Contributions policies as well as in the Social Infrastructure chapter. Ensuring that the impact created by additional housing is managed and mitigated is one of the key objectives of the Local Plan. This includes through allocating land for more schools and facilities and working with partners so they build sufficient utilities provision and securing contributions from developments which can be spend on making improvements to the local environment.</p>
All About Newham	<p><b>More data requested</b> A number of residents and businesses requested further details to be added to this section on greenspace, demographics and the faith, community and voluntary sector. The LLDC requested clarity on whether the housing figures included their data too.</p> <p><b>15 minute neighbourhoods</b> A number of residents expressed concerns relating to 15 minute neighbourhoods and its implementation. In particular concerns that this approach was designed to</p>	<p><b>More data requested</b> While this section is intended as a short overview of the borough, further details were added regarding demographic data available since the release of Census 2021 data as well as more information on the faith, community and voluntary sector. The wording and housing figures have been updated and clarified to explicitly include the LLDC.</p> <p><b>15 minute neighbourhoods</b> As above, no changes have been made to the approach as the Council's commitment to delivering 15 minute neighbourhoods has been outlined in a number of documents and the whole Local Plan has been</p>

	<p>reduce freedom of movement or limit choice. There were concerns it was undemocratic and not consulted on.</p>	<p>subject to detailed consultation. However further information regarding the delivery of 15 minute neighbourhoods has been added to the justification text for BFN1 to better explain that the purpose of 15 minute neighbourhood principles is to increase choice and the range of facilities residents can access. To better reflect the intentions behind this objective, this principle is now referred to as a network of well-connected neighbourhoods, in the Local Plan.</p>
Vision and Objectives	<p><b>General Support</b> A broad range of consultees supported the vision or aspects of it.</p> <p><b>Gentrification</b> A few residents and Councillors expressed concern that the Plan was not sufficiently radical to reduce or tackle gentrification in the borough.</p>	<p><b>General Support</b> Support for the vision and objectives is welcomed.</p> <p><b>Gentrification</b> Gentrification is a process where an increase in high income residents to an area changes its character, displacing existing residents and businesses due to increasing rents and house prices. Even where the previous population may not be displaced, the changes in population and character, businesses and spaces can make long term residents feel unwelcome or priced out of participating in community spaces and activities. To address this phenomenon the Local Plan includes policies to deliver affordable housing across the borough; to increase the number of affordable retail units in new town centres (so independent and local business can afford to open in them); creating greater flexibility on where smaller community facilities can be located, so they are in areas where it may be cheaper to rent or purchase space and located more evenly across the borough; to require developments delivering space for businesses to sign up to the Community Wealth Building pledges and provide priority access to jobs and fund training for local residents; to ensure new community facilities are accessible to all residents and are designed to meet the needs of the local community. The Plan also requires that all significant developments are masterplanned alongside the existing community - so that the community are central to shaping the borough as it changes. However</p>

	<p><b>More objectives</b> A number of residents requested additional objectives to be added on open space, air pollution, litter, community facilities, shops, cycling, culture, areas of the borough and transport. Natural England requested further wording on protecting the natural environment and tackling the climate emergency.</p> <p><b>Role of specific sites</b> A developer and the Royal Docks team requested that changes be made to the vision and objectives to change the nature of the development proposed on their site and place more emphasis on the Royal Docks.</p> <p><b>Deliverability of Objectives</b> A community group objected to a number of the objectives on the grounds that a Local Plan cannot deliver them, including: Living Wage, measuring health and happiness, ensuring developments work for a range of residents.</p> <p><b>Small sites</b> A resident and Councillors raised a concerns that the Plan doesn't include reference to intensifying council housing sites.</p>	<p>the Local Plan must remain deliverable within the context of national and regional policy and legislation.</p> <p><b>More objectives</b> Further sub-points and wording have been added to the objectives to address nature, litter and the climate emergency. Some suggestions were not incorporated as they were considered too detailed for this section and were captured in the neighbourhood chapters and/or thematic policies.</p> <p><b>Role of specific sites</b> A change was made to indicate the wider range of economic activity that will take place within the Docks. No other changes were made as the vision is a borough wide statement, with further detail provided in the relevant neighbourhood visions for the different parts of the borough.</p> <p><b>Deliverability of Objectives</b> No changes were made to these objectives as each is supported by policies in the Plan which will implement and measure their delivery.</p> <p><b>Small sites</b> Wording has been added to clarify that the intensification of smaller sites, including council owned sites have a significant role to play in the Plan's Spatial Strategy. Policies in the Housing and Design chapters already specifically support small site intensification and the Characterisation Study includes a Small Site Intensification Design Guide.</p>
<b>Building a Fairer Newham</b>		
BFN1 Spatial Strategy	<b>General Support</b>	<b>General Support</b> Support for the policy is welcomed.

	<p>This policy was broadly supported by developers, duty to cooperate partners and statutory consultees, including the Mayor of London.</p> <p><b>Employment references</b> Developers requested a number of changes related to referencing employment uses on certain site allocations.</p> <p><b>Open space requirements</b> Developers and the Royal Docks Team requested greater flexibility on the open space requirements, suggesting there is insufficient evidence to proscribe the type and scale of open space.</p> <p><b>Walking and cycling routes</b> The Royal Docks Team and residents suggested more references should be included to specific walking and cycling routes, including the Royal Docks Corridor Scheme.</p> <p><b>15 minute neighbourhoods</b> A number of residents raised concerns regarding the intentions and deliverability of 15 minute neighbourhoods.</p>	<p><b>Employment references</b> These changes were not made as the level of detail in the policy is considered suitable for a strategic policy and the allocation requirements align with the employment policies and Employment Land Review evidence base.</p> <p><b>Open space requirements</b> Changes to this policy approach have been made to reflect the latest Green and Water Spaces Strategy. This outlines the importance of consolidated open spaces which meet the definition of a Local Park (which includes a scale of 2ha) to address significant open space deficiency, across the borough but particularly in the high growth areas of the borough and so requirements to deliver Local Parks have been retained.</p> <p><b>Walking and cycling routes</b> A change to this policy has been made to better reference the need for improved local walking and cycling connections.</p> <p><b>15 minute neighbourhoods</b> Further explanation regarding 15 minute neighbourhoods has been provided in the justification text for BFN1 to better explain the intention and implementation of the concept in particular to better explain that the purpose of 15 minute neighbourhood principles is to increase choice and the range of facilities residents can access. To better reflect the intentions behind this objective, this principle is now referred to as a network of well-connected neighbourhoods, in the Local Plan.</p>
--	---	---

	<p><b>Delivery of Infrastructure</b> The Royal Docks Team requested greater coordination of social infrastructure and developers requested greater flexibility to assess need at time of application. The Environment Agency suggested this should be considered earlier in the process. Sports England wanted to ensure the requirements were inline with up to date evidence.</p>	<p><b>Delivery of Infrastructure</b> Updates were made to the policy to reflect the latest infrastructure specific evidence base documents. No further changes were made to respond to these comments as the Plan, supported by infrastructure specific evidence base and the Infrastructure Delivery Plan, provides sufficient evidence on need, coordination and delivery of infrastructure.</p>
BFN2 Co-designed masterplanning	<p><b>General Support</b> This policy was strongly supported by residents, the Mayor of London, neighbouring Planning Authorities, statutory consultees and some developers.</p> <p><b>Post Occupancy Surveys</b> The Home Builders Federation and a number of developers questioned the purpose and value of post occupancy surveys. A resident highlighted their importance. Councillors expressed their support for such surveys and wanted more detail on their implementation.</p> <p><b>Definition, explanation and inclusion of, co-design</b> There was broad support for the requirement to undertake co-designed masterplanning from developers, residents, neighbouring boroughs, the Mayor of London and Transport for London. A number of residents, developers and the Friends of Queens Market requested further detail be provided on what would constitute co-design. A few developers requested the removal of the requirement.</p>	<p><b>General Support</b> Support for the policy is welcomed.</p> <p><b>Post Occupancy Surveys</b> A change to this policy has not been made as we continue to consider post occupancy surveys to be a useful tool in monitoring how successful the Plan has been at delivering its objectives and the implementation text already provides an explanation of their purpose and delivery.</p> <p><b>Definition, explanation and inclusion of, co-design</b> A change to the approach was not made as we did not consider that the additional of further detail or definition of co-design to be appropriate in the policy wording. As such guidance would be too detailed for the Local Plan policy. The Statement of Community Involvement (SCI) is the correct document to provide that detail. The Council will review the SCI following the Local Plan adoption to add further detail on co-design in planning and development. The removal of the requirement was not considered in line with the Plan and Council's objectives regarding people powered Newham.</p>

	<p><b>Piecemeal Development</b> Developers objected to the policy wording resisting piecemeal development and the policy requirement to bring forward a masterplan which covers the whole of a site allocation, on the basis that a number of site allocations have a number of owners.</p> <p><b>Meanwhile uses</b> Developers and the Royal Docks Team were broadly supportive of policy which requires phased sites to consider delivery of meanwhile uses and submit meanwhile use strategies but raised questions about how they would be secured, the impact on the final scheme as well as raising questions on support for speculative meanwhile applications.</p> <p><b>Masterplanning requirements application to employment uses</b> One developer objected to masterplanning objectives applying to employment sites on the basis they weren't applicable to those types of uses.</p>	<p><b>Piecemeal Development</b> A change to this policy has not been made as the wording has been retained (with changes to reflect the new Plan's objectives and updated legislative requirements) from the current adopted policy S1. This policy is regularly used in pre-application discussions and development management decisions to secure the delivery of key Plan objectives. It does not prevent parcels of land owned by different landowners coming forward for development on their own timescales. It does ensure coordination, prevents developments from prejudicing each other and secures the optimum use of land. A masterplan is key to demonstrating that the relevant policies in the Plan can be delivered across the site allocation, allowing decision makers to have confidence that permitting smaller parcels of the site won't result in sub-optimal and piecemeal development.</p> <p><b>Meanwhile uses</b> Further guidance has been provided regarding securing meanwhile use strategies and the relationship with the final scheme in the implementation text. A new policy clause has been created in policy BFN1 to provide greater clarity on how speculative meanwhile use applications will be assessed, as well as requirements for meanwhile strategies on phased sites.</p> <p><b>Masterplanning requirements application to employment uses</b> This policy approach has now changed due to provide clarity on its applicability to developments providing a range of uses. The Council does not consider industrial sites, or any other uses, unable to consider or deliver the aspects or objectives listed in the policy. They are broad enough principles to be adapted to any site and use specific contexts.</p>
BFN3 Social Value and Health Impact	<p><b>General Support</b></p>	<p><b>General Support</b> Support for the policy is welcomed.</p>



Assessment – delivering social value, health and wellbeing	<p>There was broad support for this policy from residents, one neighbouring borough, developers and one community group.</p> <p><b>Scope of the SV-HIA</b> One developer asked for further guidance on the scope and requirements of the SV-HIA.</p>	<p><b>Scope of the SV-HIA</b> This policy approach has now changed to provide greater clarity on the approach to SV-HIA. P</p>
BFN4 Developer contributions and infrastructure delivery	<p><b>Prioritisation of affordable housing relative to infrastructure</b> Sports England, the Environment Agency, Transport for London raised concerns regarding the planning obligation hierarchy placing the delivery of affordable housing first. A number of residents raised the importance of sufficient infrastructure to support growth in homes.</p> <p><b>Financial contributions to non-council public services</b> The Lee Valley Regional Park Authority, NHS and Metropolitan Police requested that the plan include explicit support to secure funding from developments for their organisations.</p>	<p><b>Prioritisation of affordable housing relative to infrastructure</b> This policy approach has now changed to provide better clarity on the approach which will be used to ensure required infrastructure will be delivered, while emphasising the Council's commitment to delivering affordable housing.</p> <p><b>Financial contributions to non-council public services</b> Further clarity has been made to the relevant parts of the Plan (Social Infrastructure, Green and Water Infrastructure, Design and High Street policies). Where requested by the NHS, using the opportunities to meet these needs identified by the site allocation methodology work, the delivery of a health centre designed to meet NHS needs and standards is required on specific site allocations. The Plan requires the delivery of the health facilities to be subject to a needs base assessment at the time of delivery. Where no NHS facility is coming forward on a large site, any financial contributions would be considered at application stage and on an application specific basis and the financial contribution linked to a specified health project where the health needs of that population would be met. A similar scheme and site secured specific approach will be taken to securing contributions for the Lee Valley Regional Authority and Metropolitan Police.</p>

	<p><b>Infrastructure Sufficiency Assessments</b></p> <p>A number of developers suggested the removal of the requirement for high density developments to demonstrate there is sufficient infrastructure to support the scale of development on the basis that this is the role of the Council through strategic planning.</p> <p><b>Clarity on planning obligations</b></p> <p>The Metropolitan Police and a number of developers requested greater clarity on where planning obligations can be found, formulas to calculate them and a suggestion to list them in one location.</p>	<p><b>Infrastructure Sufficiency Assessments</b></p> <p>This change was not made, although a change to the policy was made so it no longer refers to referable schemes. This policy wording reflects London Plan policy D2 and the development scale thresholds relates to the scale of development we consider to be high density (see policy D4 in the Draft Local Plan) and the important relationship between masterplanning and consideration of infrastructure capacity. The policy is considered important for the Council to ensure that there is sufficient infrastructure capacity to support growth, as per the requirements of London Plan policy D2.</p> <p><b>Clarity on planning obligations</b></p> <p>No change to this policy has been made to address these comments. As policies which require planning obligations are included within the thematic and spatial policies. Any relevant obligations are listed under the heading Planning Obligation which directly follows the policy text. Formulas have been added to these, where relevant.</p>
<b>Design</b>		
D1 Design standards	<p><b>Inclusive design standards</b></p> <p>Residents, Councillors and the LLDC requested more explicit policy support for inclusive design standards. Sports England recommended explicitly supporting active design to help encourage active lifestyles for everyone.</p> <p><b>Concern with quality of recent developments.</b></p> <p>Several residents and Councillors have commented to express their concern with recent developments in their area/Newham being of low quality, from large scale schemes to householder extensions. They were concerned</p>	<p><b>Inclusive design standards.</b></p> <p>This policy has changed to include additional references to inclusive and active design standards, making use of nationally available best practice guidance and the LLDC inclusive Design Standards 2019.</p> <p><b>Concern with quality of recent developments.</b></p> <p>A change to this policy has not been made as the policies draw on substantial current best practice guidance as well as learning from recent developments in Newham. However, a change to the implementation text of this policy has been made to provide additional guidance for householder extensions.</p>

	<p>that any design standards will not be adequately and consistently applied.</p> <p><b>Preferential location of plant equipment</b> Developers were concerned that giving priority to underground placement of plant equipment would be unreasonable and add costs where excavation is not normally expected.</p> <p><b>Role of Secured by Design guidance and security related planning obligations</b> Metropolitan Police Service supported the recognition of the standard in policy and suggested that the Local Plan could include a specific safety and security policy. They also requested that the policy implementation include support for a broad range of planning obligations being secured to support policing infrastructure, and that Designing out Crime officers could be involved in the design review process. A resident supported the use of the standard.</p> <p><b>Role of architect</b> Developers expressed concern that the requirement for retention of original is not necessary to secure quality of a development to completion in the context of existing development management practices, including design review, and that it promotes anti-competition across architects. One developer suggested that the role of original architects as design guardians working alongside the technical delivery architect(s) may be more appropriate.</p>	<p><b>Preferential location of plant equipment</b> This policy has now changed to provide more flexibility to site-specific constraints while ensuring it is effectively integrated in the overall design of a scheme.</p> <p><b>Role of Secured by Design guidance and security related planning obligations</b> Support noted. We did not consider a specific policy to be necessary as designing out crime and embedding safety considerations are suitably addressed through policy D1 and a range of other policies across the Plan. Further, we consider the planning obligation as set out is sufficiently flexible to address a range of local security and policing interventions that may be required to mitigate the impacts of development.</p> <p><b>Role of architect</b> This policy approach has now changed to allow for more flexibility on the method of retaining architect oversight.</p>
--	--	--

	<p><b>Role of community design review</b>  London Borough of Redbridge supported the concept of a youth design review panel. Councillors were concerned that there isn't enough opportunity for residents to influence development in the borough. Residents also supported the opportunity to provide local feedback into the development of a scheme at an earlier stage. Developers supported the idea, and requested more information on how the panel would run alongside the professional Newham Design Review Panel. A resident suggested there could be a role for residents to help monitor the quality of development on a site and provide feedback to the council.</p> <p><b>Application of standards to employment uses</b>  Developers requested that more flexibility is added into the policy to recognise that not all criteria will be suitable or appropriate for industrial or logistics use developments.</p> <p><b>Application of standards to temporary buildings</b>  A developer raised concerns that the design requirements are onerous for shorter term temporary developments and may render them unviable.</p>	<p><b>Role of community design review</b>  We have not made changes to this policy as the policy already supports public engagement and co-design. However, the policy implementation text has changed in response to further best practice research.</p> <p><b>Application of standards to employment uses</b>  This wording change has not been made as Newham is a densely built borough, with residential and employment uses often existing or delivered side by side. The principles of good quality design are applicable irrespective of the use, and there is sufficient flexibility built into the policy to allow for site-specific considerations. However, the implementation text has been amended to clarify the expectation that employment development should optimise application of the principles to their site.</p> <p><b>Application of standards to temporary buildings</b>  This policy approach has now changed to provide a more proportionate approach to the design standards and time length of temporary developments. Please see the new wording in Policy D1 Design Standards.</p>
--	--	--

	<p><b>Residential extensions, front gardens and walls.</b> A small developer requested support for two storey extensions. A resident requested additional support for reinstatement of front gardens and walls.</p> <p><b>Planning obligations for post-occupancy surveys</b> Developers argued that the need for post-occupancy surveys should be negotiated on a site by site basis. A resident suggested the requirements should be made stronger in order to better monitor the quality of development, tied to improved enforcement processes.</p>	<p><b>Residential extensions, front gardens and walls.</b> A change to this policy implementation text has been made to provide additional guidance for householder extensions and for the role of front gardens. However, we did not consider it appropriate to explicitly support two storey extensions as the policy criteria set within policies D1 and D7 (now D6) are considered effective at addressing the design quality for a range of small scale developments.</p> <p><b>Planning obligations for post-occupancy surveys</b> A change to this policy has not been made as we continue to consider post occupancy surveys to be a useful tool in monitoring how successful the Plan has been at delivering its objectives. However, the planning obligation in D1 was a duplication of requirement in policy BFN2 and has now been removed from this policy's list of obligations.</p>
D2 Public realm net gain	<p><b>Inclusive design standards</b> LLDC recommended the use of additional guidance documents and to ensure that the policy makes clearer the importance of targeted engagement to understand the experience of different user groups, particularly women and girls. Historic England recommended the inclusion of their advice note Streets for All to the implementation guidance. Residents have also raised concerns about the quality of the public realm: its upkeep, accessibility, safety, lack of greenery, signage legibility, and clutter.</p> <p><b>Active Travel Zone Assessment vs. Healthy Streets Framework</b> TfL argued that the type of assessment used to inform public realm net gain should be the Active Travel Zone Assessment</p>	<p><b>Inclusive design standards</b> This part of the Plan has now changed to provide further inclusive design criteria and relevant best practice guidance to support implementation. Guidance to inform quality of signage that can improve accessibility for people with disabilities, including dementia, have been included in Policy D5 (formerly D6) on Shopfronts and Advertising.</p> <p><b>Active Travel Zone Assessment vs. Healthy Streets Framework</b> This change has been made.</p>

	<p><b>Green infrastructure as part of public realm interventions</b> The part of the policy was supported by the Environment Agency, Lee Valley Regional Park Authority and the London Historic Parks and Gardens Trust. EA recommended to include Natural England's Green Infrastructure Framework and the GLA's Urban Greening Factor (UGF) guidance documents in the implementation section of the policy. London Historic Parks and Gardens Trust recommended that green infrastructure in the public realm should be supported more broadly rather than in areas of deficiency. There was also broad support from developers.</p> <p><b>Playspace in public realm</b> Developers requested more flexibility on this policy to reflect circumstances where site constraints would not allow for public access to the playspace provided, e.g. when located at podium level. One developer objected to the principle of requiring developers to provide additional playspace to cater for existing deficiencies.</p> <p><b>Additional public realm floorspace on large sites</b> Developers questioned what quantitative public realm gains are expected, if there is a specific methodology for calculating additional floorspace for public realm. They noted that the principle is supported, however not all sites can deliver substantial increases in public realm.</p> <p><b>Formula for calculating planning obligations for maintenance of highways</b> Developers requested clarification of how the planning obligation will be applied and calculated</p>	<p><b>Green infrastructure as part of public realm interventions</b> Support was welcomed and we have amended the policy to clarify that green infrastructure is a requirement for developments across the brought, rather than just in areas of deficiency of access.</p> <p><b>Playspace in public realm</b> We have updated this policy following the completion of the Green Space Infrastructure Study (2023). This has led to specific playspace requirements being embedded in site allocations, and thereafter this policy has been amended to clarify that it is complementary to the requirements established in the site allocations, encouraging additional provision of playspace to be located in the public realm of the scheme.</p> <p><b>Additional public realm floorspace on large sites</b> This policy part has been removed in recognition that requirements for new public realm floorspace are embedded in site allocations which would result in quantitative net gains meeting the requirements of this policy.</p> <p><b>Formula for calculating planning obligations for maintenance of highways</b> This planning obligations approach has now changed to provide the methodology for calculating maintenance costs, in line with the Highways department's practice.</p>
--	--	--

<p>D3 Design-led residential site capacity optimisation</p>	<p><b>Design-led approach</b> There was broad support for the principles of this policy across developers. London Borough of Waltham Forest also expressed support.</p> <p><b>Moderate uplift in density</b> Developers argued that the word ‘moderate’ should be removed and that more support should be given in the policy for higher density development in more accessible areas. A developer suggested that the policy map should show the ‘transform’, ‘enhance’ and ‘conserve’ areas within Newham.</p>	<p><b>Design-led approach</b> Support for this policy is welcomed.</p> <p><b>Moderate uplift in density</b> A change to this policy has not been made as the policy is intended to provide additional detail about how the design-led approach should be considered in Newham's different contexts, as recommended by the Characterisation Study (2022) that was developed in line with GLA methodology within the Characterisation and Growth Strategy LPG (2022).</p>
<p>D4 Tall buildings</p>	<p><b>Flexibility - Greater heights</b> Developers considered the proposed prevailing heights and maximum heights permissible too restrictive and requested either the removal of maximum height parameters and/or to have greater prevailing heights and/or maximum heights. Some developers also proposed allowing more flexibility for tall buildings outside of tall building zones. They raised concerns that the evidence base was not robust enough to mandate these heights and zones.</p>	<p><b>Flexibility - Greater heights</b> A change to this policy approach has not been made as Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and requires boroughs to identify in their development plan what is considered a tall building for their specific localities. Newham’s Characterisation Study (2023) has been updated and supplemented with a Tall Building Annex (2024). The document summarizes the sieving exercise that has been undertaken to identify locations where tall buildings may be an appropriate form of development and expands on the townscape assessment for each area of the borough. Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Through this further analysis it was concluded if a tall building zone designation could be extended to areas that had the same sensitivity and suitability for tall buildings developments as other areas already allocated to tall building designation and if the maximum proposed heights were in line with the methodology or should be amended.</p>

	<p><b>Too many tall buildings</b> Residents objected to tall building developments - especially for residential uses - and proposed restrictions on building heights to maximum 6 storeys, expressing their concern regarding potential antisocial behaviour experienced in the past in high rise council estate buildings, overshadowing and overlooking issues and the design quality of tall building developments when they are not well integrated with the surrounding low rise/medium rise context.</p> <p><b>Consistency between permitted heights and proposed heights</b> London Legacy Development Corporation supported the policy in principle but objected to the inconsistency between consented schemes and proposed maximum heights. A number of other developers also objected to the inconsistency between consented schemes and proposed maximum heights.</p> <p><b>Airport constraints</b> Royal Docks Team objected to the policy approach of defining maximum building heights on sites constrained by</p>	<p><b>Too many tall buildings</b> Policy D9 part A requires boroughs to identify in their development plan what is considered a tall building for their specific localities but it states that tall building "should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey." In accordance to Policy D9 part A, and based on local context analysis, Newham has defined 21m (ca. 7 storeys) as the height at which buildings become substantially taller than its surrounding. Tall buildings are key to deliver the much needed homes and the emerging Local Plan has identified suitable locations for tall building developments and the maximum heights that could be acceptable in these locations. The impacts of overlooking and loss of privacy, overshadowing, and overbearing massing on neighbouring residential properties are already addressed in Policy D6.3. However, policy D4.3 and D4.4 have been expanded to ensure tall building developments are well integrated with their wider context and define a good quality public realm.</p> <p><b>Consistency between permitted heights and proposed heights</b> A review of permitted heights was undertaken as part of the methodology to establish the maximum heights within tall building zones. However, following this feedback, further analysis of permitted heights was undertaken to consider whether these permitted heights aligned with the spatial hierarchy, the desire to create legible and consolidated clusters and the suitability analysis. This resulted in a number of changes to the proposed maximum heights. This analysis is outlined in the Tall Buildings Annex (2024).</p> <p><b>Airport constraints</b> This policy approach has not been changed as the Council does not have the expertise to make assessments that overcome safeguarding</p>
--	---	---



	<p>the London City Airport safeguarding limitation, suggesting more flexibility and a case-by-case assessment.</p> <p><b>DLR constraints at Beckton Riverside</b> Royal Docks Team and Two developers objected to the policy approach of defining maximum building heights depending on the DLR extension in Beckton Riverside.</p> <p><b>Height parameters consistency</b> Developers and statutory consultees objected to the inconsistency between maximum heights parameters expressed in meters in the tall building zones and expressed in number of storeys in the site allocation design principles. They also raised that different land uses could require different floor-to-floor heights and could therefore result in a different number of storeys.</p> <p><b>Support industrial intensification</b> Developers with an interest in industrial lands in the Borough requested the reconsideration of the approach to tall building zones in the context of London Plan and Local Plan industrial intensification objectives.</p> <p><b>Impact on conservation areas and heritage assets</b> The GLA supported the policy and the methodology but suggested to refine the policy to ensure the London View Management Framework (LVMF) View 9A.1 is protected. Historic England objected to the impact tall building</p>	<p>concerns. The identified maximum height also align with the spatial hierarchy of the plan.</p> <p><b>DLR constraints Beckton Riverside</b> This policy approach has now changed to enable early sustainable development at a suitable scale in the most appropriate location in proximity to the Gallions Reach DLR station. Suitable heights still relate to future public transport availability.</p> <p><b>Height parameters consistency</b> This policy approach has now changed to ensure a consistent approach to referencing heights in Policy D4 and the Neighbourhood policies. Prevailing heights and maximum heights are now expressed in meters providing an estimate of number of storeys could be achieved for explanatory purpose only. Furthermore, implementation text has been clarified to explain that Policy D4 applies to all buildings of 21 m, irrespective of use and related floor-to-floor height.</p> <p><b>Support industrial intensification</b> This policy approach has now changed following further analysis undertaken and outlined in the Tall Buildings Annex (2024). Through this analysis it was concluded that, due to their location in the Royal Dock and Beckton Riverside Opportunity Area, the Strategic Industrial Locations could be included in the tall building designation in order to support industrial intensification with a stacked industrial typology.</p> <p><b>Impact on conservation areas and heritage assets</b> This policy approach has now changed. A reference to the importance of conserving and enhancing the significance of heritage assets and key views set out in the London View Management Framework (LVMF) and in adopted Conservation Area Appraisals and Management Plans have been included. Wording has also been added to clarify how</p>
--	--	---

	<p>developments could have on conservation areas and requested better reference to heritage considerations.</p> <p><b>Impact on watercourses, open spaces and microclimate</b> Public bodies (the Canal River Trust, Environment Agency and Lee Valley Regional Park Authority) objected to the impact tall building developments could have on watercourses and open spaces and the risk to groundwater for tall buildings in locations within Source Protection Zones (SPZs). Residents objected to the impact tall buildings have on the microclimate and how this have a negative impact on pedestrian and cycling experience.</p>	<p>development proposals of tall buildings in proximity to sensitive areas should respond to the historic environment and manage the transition between conserve and transform areas.</p> <p><b>Impact on watercourses and open spaces and microclimate</b> Further wording has been added to the implementation text to stress the importance of wind assessments in high streets and town centres, ensure groundwater resources are preserved and ensure the impact of tall buildings on watercourses are considered in line with Green and Water Space policies.</p>
D5 Living well at high density	<p><b>Broad support for principle</b> Broad support from developers and the LLDC. Nevertheless, a residents noted that the policy is not very specific in how it may improve quality of high density developments, and another was sceptical of high density living being suitable.</p> <p><b>High density definition as 250 units/ha</b> A developer argued that the local 'higher density' level of 250 units/ha does not align with the London Plan (2023) higher density level of 350 units/ha. The LLDC noted that there are a number of areas in its remit where this density is achieved or surpassed in both delivered and approved schemes.</p>	<p><b>Broad support for principle</b> Support is welcomed. The policy was developed in response to available best practice and the recommendations of the Newham Characterisation Study (2022), as available at the time of drafting. We recognise there is ongoing research into the interaction between density levels and health and wellbeing of people.</p> <p><b>High density definition as 250 units/ha</b> This policy has now changed to clarify that this policy provides additional design criteria for developments where the principle of high density development at or above 250units/ha is acceptable. This threshold has been identified following emerging research on how density impacts on quality of life and social inclusion, set out in the evidence base for the policy, and an assessment of major planning applications considered by the LPA over the last 5 years. The London Plan does not include the 350 units/ha as a threshold in policy, and it is intended to be an indication of how 'higher density' is to be interpreted, flexibly, in the London Plan (2021) policy context. This does not preclude boroughs developing their own standards for managing high density.</p>

	<p><b>Pedestrian-friendly prevailing building height</b> Two developers noted that the principle of pedestrian-friendly prevailing building height should not apply to the overall scale of development, but to the lower levels or podium.</p>	<p><b>Pedestrian-friendly prevailing building height</b> The policy has changed to clarify the intention to create a consistent base, rather than consistent overall height.</p>
D6 Shopfronts and advertising	<p><b>Scale of impact</b> Residents wanted the policy to be bolder and also directly address the quality of existing shopfronts. A business owner noted that the criteria must be flexible to apply in different circumstances.</p> <p><b>Protection of heritage</b> A few residents were concerned with the quality of shopfronts and advertisements in the setting of conservation areas and other heritage assets.</p>	<p><b>Scale of impact</b> We did not make changes to the policy as it is already considered to be suitably flexible. It is not possible to impose design standards retrospectively on existing buildings or to recently approved developments being delivered via the planning system.</p> <p><b>Protection of heritage</b> The policy implementation approach has been changed to refer to the need to address heritage impacts however, the criteria cannot be applied retrospectively, or to changes/advertisements that do not require planning permission.</p>
D7 Neighbourliness	<p><b>Broad support</b> The Environment Agency, Network Rail, the Port of London Authority and business operators expressed support for the agent of change principles and the detailed guidance set in the policy. One developer also expressed support.</p> <p><b>Measuring amenity impacts</b> Tate &amp; Lyle suggested that implementation section should provide additional guidance on measuring the worst case scenario amenity impacts of established employment uses.</p>	<p><b>Broad support</b> Support for the policy is welcomed.</p> <p><b>Measuring amenity impacts</b> This change to the policy implementation approach has been made, to provide additional guidance of what an applicant should take into consideration when assessing the impact of neighbouring development on the amenity of future occupiers of the site.</p>
D8 Conservation Areas and Areas	<p><b>Broad support</b></p>	<p><b>Broad support</b></p>

of Townscape Value	<p>The Lee Valley Regional Park Authority, and residents expressed support for the policy. One business owner noted it was unclear what the policy is protecting.</p> <p><b>Consistency of heritage protection</b> Historic England were broadly supportive but expressed the need for the policy to be clearer and be further strengthened in relation to development that could potentially affect heritage assets and their significance.</p>	<p>Support noted. No changes have been made as the policy sets out the framework of Council's legal responsibilities under which designations for Conservation Areas and Areas of Townscape Value are made.</p> <p><b>Consistency of heritage protection</b> The policy implementation text has now changed to require a Heritage Impact Assessment, and in the case of tall buildings also a Townscape Visual Impact Assessment, to justify the design solution and help mitigate any impacts on the significance of heritage assets or their setting. This is aligned with the revised approach in policy D4 (Tall buildings).</p>
D9 Archaeological Priority Areas	<p><b>Broad support</b> London Historic Parks and Gardens Trust, a resident and a developer expressed support for the policy.</p> <p><b>Archaeological Priority Areas evidence base update</b> Historic England noted that the council should seek to update the spatial evidence base to reflect recent fieldwork which would helpfully refine both spatial extent and significance.</p>	<p><b>Broad support</b> Support welcomed.</p> <p><b>Archaeological Priority Areas evidence base update</b> Following further engagement with GLAAS, wording change has been made to indicate that the council will seek to commission this work during the lifetime of the Plan.</p>
D10 Designated and non-designated heritage assets, ancient monuments and historic parks and gardens	<p><b>Broad support</b> Historic England, London Historic Parks and Gardens Trust, a business owner and several residents expressed support for the policy. Residents expressed concern for the protection of heritage assets, including their maintenance and appropriate use, and a desire for stronger policy and enforcement.</p> <p><b>Non-designated archaeology</b> Historic England requested reference be included in the policy to non-designated archaeology.</p>	<p><b>Broad support</b> Support noted. While we not residents desire to better protect heritage assets, we have not made changes to the policy as a level of change is sometimes necessary to maintain viable use of heritage assets, which will help preserve them.</p> <p><b>Non-designated archaeology</b> This wording change has been made.</p>

	<p><b>Harm vs. public benefit</b></p> <p>Two developers argued that the policy should support less than substantial harm where there are public benefits emerging from the proposed scheme.</p>	<p><b>Harm vs. public benefit</b></p> <p>A change to this policy approach has not been made as the policy is aligned with the NPPF approach, which gives significant weight to any level of harm to designated heritage assets and their setting.</p>
<b>High Streets</b>		
HS1 Newham's Town Centres Network	<p><b>Definition of town centres in Newham's context</b></p> <p>Developers argued that the policy is unclear as it appears to separate local centres and larger town centres, rather than use the NPPF definition of 'town centre' for both.</p> <p><b>Katherine Road designations</b></p> <p>Rt Hon Sir Stephen Timms MP welcomed the additional designations along this major route through the borough. Two residents expressed concern that previous refusals of planning permission have meant that shops have remained vacant. One resident argued that more of the street frontages should be protected, while another argued that the neighbourhood parade in the north of the street is low quality and should not be designated.</p> <p><b>15 minute neighbourhoods and the Newham Town Centres Network</b></p> <p>Developers broadly expressed support for the approach of the policy to ensure centres are within walking distance of the people they serve. Developers requested clarification that the policy's catchment criteria only apply to proposals for new main town centre uses. One developer considered that the catchment criteria is unrealistic, while the Royal Docks team and a developer argued for more provision to be made for the Royal Docks area. A resident argued that</p>	<p><b>Definition of town centres in Newham's context</b></p> <p>We have added a clarifying explanation that main town centre uses are directed to both town centres and local centres, as both types of centres meet the NPPF 'town centre' definition. However the Local Plan maintains the London Plan's definitions and referring to centres functioning at district level and above as town centres, and centres that service more localised Newham catchments as local centres.</p> <p><b>Katherine Road designations</b></p> <p>No changes have been made to these designations. As part of the review of Newham's town centre network at Reg 18 stage, we've designated significantly more frontages of Katherine Road, as 2 new Local Centres and an expanded Neighbourhood Parade. These sections were identified as the most suitable for protection following assessment against policy aspirations for the network and the high street health check criteria set out in the Town Centre Network Review Methodology Paper 2022.</p> <p><b>15 minute neighbourhoods and the Newham Town Centres Network</b></p> <p>No changes have been made to this policy approach. The idea of 15 minute neighbourhoods is used to ensure that all residents can live within a 15 minute walk of key facilities such as shops, community facilities and workspaces. This is so that residents do not have to travel so far to reach these essential services. Residents are of course welcome to travel further afield to reach a wider range of facilities. To better reflect the intentions behind this objective, this principle is now referred to as a network of well-connected neighbourhoods, in the Local Plan. In the case of this policy, the 15 minutes neighbourhood</p>

	<p>using the 15 minute neighbourhood concept limits access to particular shops only, while several other residents supported the policy. Another resident argued for improved connectivity to and accessibility of the centres. Councillors commented that the concept of 15 minute neighbourhoods and the Local Plan neighbourhood boundaries require resident engagement.</p> <p><b>Impact Assessment requirement for new centres</b> Two developers argued that the use of Impact Assessments as part of delivering new centres in line with the Local Plan designations is unnecessary and will hamper investment and deter businesses from locating in Newham. They consider the threshold of 300sqm GIA is too low.</p> <p><b>Scale criteria for new/extended local centres, including provision for 'small to medium sized food stores'</b> Developers support the role of masterplanning in determining the overall location, scale and mix of the new main town centre uses. However, The Royal Docks team and two developers argued the policy needs more flexibility. They suggest that the quantum, size and location of units should be assessed on a case-by-case basis and based on evidence at the time of application, in order to respond to local needs and rapid changes in the retail and leisure industries and allow a suitable mix of uses.</p>	<p>concept has informed the designations within Newham's Town Centres Network. Please see Town Centre Network Review Methodology Paper 2022 and the Town Centre Network Review Methodology Paper Update 2024. At the moment some parts of our borough are very isolated and do not have easy access to shops and facilities. The Plan aims to change this, through introducing new locations for shops, community facilities etc, and by creating new routes to increase access to existing facilities.</p> <p><b>Impact Assessment requirement for new centres</b> Some clarifying language has been added to explain that the intention is that the overall scale of new local centres (or extensions to these) and new neighbourhood parades should be subject to an Impact Assessment, in order to ensure their scale is aligned with local need rather than a larger offer that may draw trade away from existing town and local centres. The threshold for the Impact Assessment has not been changed. The requirements are in line with the NPPF and the recommendations of the Retail and Leisure Study (2022).</p> <p><b>Scale criteria for local centres, including provision for 'small to medium sized food stores'</b> The policy has been updated and now allows for flexibility in unit sizes. Units should primarily be small but some units larger than 150sqm GIA can be delivered in Local Centres, if justified by local need. The policy on the size of food stores has also changed to allow for more flexibility in the type of provision which can be located in Local Centres, recognising the variety of business models for small and medium convenience store operators.</p>
--	---	--

	<p><b>Stratford Town Centre</b> A developer supported the ongoing vision to grow the centre to an international scale, while the LLDC requested additional support in policy for the growth of the centre. The LLDC further argued that the boundary as identified should be revisited as this does not accurately reflect the current boundaries as shown in the adopted Newham and LLDC local plans when taken together, and that it should include the East Bank area.</p> <p><b>East Village Local Centre</b> The LLDC argued that the local centre boundary should be amended to include a significant new floorspace of town centre uses recently delivered.</p> <p><b>Silvertown Local Centre</b> The Royal Docks team and a developer argued that the designation should be for a District scale or above. The developer further argues that the Silvertown Quays site allocation should deliver a new centre which is separate from the existing local centre at Royal Wharf, and that it is not appropriate for the location of this Local Centre to be illustrated on a map and/or the boundary should reflect the approved planning status of the site which includes significant allowances for town centre uses within and surrounding Millennium Mills.</p> <p><b>New designation potential along Portway in West Ham neighbourhood.</b> A resident raised the possibility to designate a local shops parade on Portway at the level of Amity Road (E15 3QJ).</p>	<p><b>Stratford Town Centre</b> The designation boundary of Stratford Metropolitan has now changed to correct the omission of the East Bank site. Additional guidance regarding the evolution of Stratford to an International scale has also been provided. Uses at plot N17 have been retained in the revised boundary of East Village Local Centre as the uses are suitable Local Centre uses and are spatially connected to the public realm of East Village Local Centre. More information is included in the Town Centre Network Review Methodology Paper Update 2024.</p> <p><b>East Village Local Centre</b> The proposed change to the boundary of East Village Local Centre has been made.</p> <p><b>Silvertown Local Centre</b> A change to this boundary has been made to reflect the revised design principles of the site allocation, recognising the benefit of designing in the principle of an active frontage, high street style street connecting the new pedestrian bridge landing point through to the DLR station. We have also clarified the centre's relationship to the Excel centre and its visitors. However, we have retained the single local centre with Silvertown Quays and Royal Wharf as this optimises the ability to create an integrated and complementary single cluster. In addition, the policy already allows for the boundary of the Local Centre extension to be flexibly adjusted through masterplanning processes.</p> <p><b>New designation potential along Portway in the West Ham neighbourhood</b> This new designation has been made, alongside protection of further frontages on Plashet Road to the east. These new designations help complete gaps in the network around West Ham Park. The Town Centre</p>
--	--	---

	<p><b>Gallions Reach Shopping Centre and relationship to the future town centre at Beckton Riverside</b></p> <p>A developer argued that the new town centre designation on the site allocation should support the protection and ongoing maintenance of the existing shopping park and associated asset management through a phased delivery.</p>	<p>Network Review Methodology Paper Update 2024 sets out in further detail the assessment made.</p> <p><b>Gallions Reach Shopping Centre and relationship to the future town centre at Beckton Riverside</b></p> <p>We have not changed our approach in relation to the Gallions Reach Shopping Park. The transformation of an out of town retail park into an accessible district centre, remains contingent on delivery of the new DLR station and route or similarly transformative (as confirmed by Transport for London public transport intervention). To do otherwise risks entrenching a car-dependent and unsustainable retail location, potentially undermining the delivery of a more sustainable town centre network across the borough and East London.</p>
HS2 Managing new and existing Town and Local Centres	<p><b>Policy effectiveness</b></p> <p>Several residents supported the policy, while a few more argued that the policy needs to be much bolder in order to improve the quality of the offer of Newham's centres. Some developers supported the objectives of the policy, while others have argued that the policy is overall too restrictive.</p> <p><b>Sports uses in town centres</b></p> <p>Sports England objected to the loss criteria for Class E floorspace set out in the policy as it could potentially lead to loss of sports facilities that are otherwise protected in policy.</p> <p><b>Use Class E concentration within Primary Shopping Areas</b></p> <p>Two developers argued that the criteria is overly restrictive and not aligned with the national policy for diversity and flexibility of use.</p>	<p><b>Policy effectiveness</b></p> <p>Support for the policy is welcomed, some change have been made where supported by new evidence and these are outlined in more detail below.</p> <p><b>Sports uses in town centres</b></p> <p>This policy has been updated to clarify that other policies, such as the Social Infrastructure policies, may also apply.</p> <p><b>Use Class E concentration within Primary Shopping Areas</b></p> <p>We have updated the policy to require different targets for the percentage of Use Class E floorspace within Primary Shopping Areas. We did not remove the targets as requested, as the approach is in line with the recommendations of the Retail and Leisure Study (2022), and Class E itself provides broad flexibilities of use. We have increased the</p>



	<p>targets as our objective is for town centres to maximise the quantity of town centre floorspace (Class E) and we have evidence demonstrating that the majority of centres, and particularly Stratford Town Centre, are already performing well in terms of the town centre floorspace (Class E) being provided within them. This means an increased target is deliverable.</p> <p><b>Meanwhile Use Strategy requirement</b> A developer expressed concern that the policy will limit the attractiveness of units within the Borough and restrict the letting of units to long term tenants, in favour of short term occupiers. Another developer argued that the policy is ineffective and the council should rely on enabling market flexibilities. A further developer supported the principle, but argued that the policy should allow for the strategy to be appropriately developed and updated to reflect market conditions.</p> <p><b>Marketing Strategy requirement</b> A developer has argued that the requirement is not effective, but only a further burden on developers.</p> <p><b>Support for local small/independent businesses and affordable rent units</b> Residents requested that the Plan support local and independent businesses to set up, including through affordable rent arrangements, as they will help centres to</p>	<p><b>Meanwhile Use Strategy requirement</b> We have not changed our approach (although we have updated the name to a Vacancy Prevention Strategy) as our monitoring indicates that a number of recent large scale mixed use developments including main town centre uses have remained vacant for extended periods of times, sometimes years following completion - for example, Rathbone Market in Canning Town, and Silvertown/Royal Wharf. It is therefore imperative that the Local Plan process enables proactive management of this issue. The potential benefits of having a meanwhile use approach to managing vacancies, , are becoming more established, with positive evidence emerging from the High Streets Task Force and other case studies - please see Topic Paper: Managing Vacancies Through Meanwhile Use Strategies (2024) appended to the Retail and Leisure Study (2022).</p> <p><b>Marketing Strategy requirement</b> This policy has not changed as the effectiveness of having a Marketing Strategy to prompt proactive market research and seeking occupier commitments has been demonstrated through current planning permissions.</p> <p><b>Support for local small/independent businesses and affordable rent units</b> The policy approach remains broadly the same, however additional detail has been added about the expected approach to provision of affordable small business space within town and local centres, following</p>
--	---	--

	<p>thrive. Two developers argued that the policy will lead to unfair competitive advantage for some businesses and that it may deter development. One developer argued that the requirement should only apply to surplus floorspace, while another argued that it would be more appropriate to require 10% of floorspace to be at affordable rent levels, in line with approach taken by other councils for affordable workspace policies.</p>	<p>additional research and recommendations set out in the Topic Paper: Supporting Provision of Affordable Small Business Premises (2024), appended to the Retail and Leisure Study (2022).</p>
<p>HS3 Edge-of-Centre and Out-of-Centre retail, restaurants, cafes and services</p>	<p><b>Broad support</b> A developer supported the clear scope of the uses to which the policy applies. Other developers welcomed the sequential test exemptions criteria. A resident also expressed support for the policy.</p> <p><b>Support for businesses</b> A few residents recommended that the policy could further support local businesses. Developers have argued that the policy is too restrictive.</p> <p><b>Cafes in parks</b> A resident requested support for cafes in parks.</p> <p><b>Impact Assessment threshold</b> Developers argued that the Impact Assessment threshold at 300sqm is too low, and it will disadvantage traditional retailing compared to online retailing and will limit access to goods and services for residents.</p>	<p><b>Broad support</b> Support noted.</p> <p><b>Support for businesses</b> No change has been made as the local plan already supports creation of business spaces in suitable locations, primarily as part of the designated network of town and local centres and on employment designated land. In recognition of the important role that local small businesses play, certain exemptions from the nationally prescribed Sequential Test are also set out under this policy.</p> <p><b>Cafes in parks</b> This wording change has been made to support the principle of café facilities in parks.</p> <p><b>Impact Assessment threshold</b> This change has not been made as the Retail and Leisure Study (2022) indicated retail growth need can be accommodated within the Town Centres Network and there is no need to consider additional edge of centre or out of centre sites. The 300sqm benchmark has been used in</p>

	<p><b>Use of conditions/obligations</b> Developers argued that the clauses for Marketing Strategy, Meanwhile Use Strategy and/or limiting the range of uses permitted on the site should be removed and conditions and obligations should only be applied on a case by case basis.</p>	<p>Newham's Local Plan for more than a decade, and the evidence indicates it remains relevant. Delivery-based uses are also subject to policies of this Local Plan directing their location and quality of provision.</p> <p><b>Use of conditions/obligations to limit the use permitted</b> This change has not been made as the planning permission in the out of centre location is granted based on the proposed use and the identified level of impact. Without adequate conditioning, a different use within the broad Use Class E may operate on the site and result in local impacts that have not been assessed or mitigated against at the planning application stage.</p>
HS4 Markets and events/pop-up spaces	<p><b>Operation of markets, including sustainability best-practice.</b> Residents have been supportive of the policy. Several have asked non-planning related questions about the running and funding of markets and how support for these may be gained. Climate You Change have included recommendations on how markets can support climate change adaption and mitigation through their operation.</p> <p><b>Specific support for existing markets</b> Councillors raised concern that the Local Plan does not provide enough protection for street markets in the borough, including in Green Street and East Ham, noting their multiple socio-economic benefits.</p> <p><b>The markets management plan requirement to include sustainability criteria.</b> Climate You Change have suggested that the management plan could address how the space will be used sustainably, with as minimal carbon footprint impact as possible.</p>	<p><b>Operation of markets, including sustainability credentials</b> Support for the policy is welcomed and we have provided comments the local plan cannot address to our colleagues in the markets department.</p> <p><b>Specific support for existing markets</b> A change to the policy has not been made as the Local Plan protects existing markets and supports establishment of new ones, recognising that they offer more affordable opportunities for small local businesses.</p> <p><b>The markets management plan requirement to include sustainability criteria.</b> This policy implementation has now changed to reflect the opportunity for market operators to promote sustainable business models.</p>

	<p><b>Support for hot food stalls and open food courts in markets through ensuring the infrastructure is in place</b> A resident requested that the policy should ensure that markets have the infrastructure necessary for food courts serving hot food.</p>	<p><b>Support for hot food stalls and open food courts in markets through ensuring the infrastructure is in place</b> This policy has changed to address how markets and pop-up uses should support health and wellbeing and complement policy HS6.</p>
HS5 Visitor Evening and Night Time Economy	<p><b>Neighbourliness vs aspiration for Evening and Night Time Economy growth.</b> A business group asked for clarification of how the policy will apply alongside the requirements for neighbourly development in policy D7. Several residents supported the objective of the policy and have suggested strengthening it to bring forward a vibrant mix of evening and night time uses. Three developers also expressed support for the policy.</p> <p><b>Silvertown Local Centre</b> A developer argued that Silvertown Local Centre should be identified as an Evening and Night Time Economy Zone in the policy. The Royal Docks team also suggested that the Royal Docks area would benefit from an Evening and Night Time Economy Zone to support implementation of the Royal Docks Cultural Placemaking Strategy.</p> <p><b>Prescription of preferred location of uses in centres</b> Two developers argued that the direction of different uses towards specific areas (e.g. inside or outside of primary shopping areas) as set out in Table 5 limits the flexibility between the uses.</p>	<p><b>Neighbourliness vs aspiration for Evening and Night Time Economy growth</b> This policy has now changed to provide further clarity on the application of Agent of Change to protect the Evening and Night Time Economy Zones function of town centres, including allowing for their growth beyond current provision.</p> <p><b>Silvertown Local Centre</b> A change to this policy approach has not been made. An Evening and Night Time Economy Zone for Silvertown Local Centre was considered but not taken forward as it would not align with its designation as a local centre nor does it have sufficient night time public transport.</p> <p><b>Prescription of preferred location of uses in centres</b> This policy approach has now changed to allow for more flexibility.</p>
HS6 Health and wellbeing on the High Street	<p><b>Broad support</b> Many residents continue to raise the issue of over-representation of betting shops and hot food takeaways in</p>	<p><b>Broad support</b></p>

	<p>the borough, and support measures to restrict them. Residents also asked for bolder action to curate the offer of high streets.</p> <p><b>Green infrastructure</b> Many residents requested that the policy supports the introduction of green infrastructure for its health and wellbeing benefits.</p> <p><b>Application of healthy food standards</b> A resident has argued that the requirement for accreditation to healthy food standards set by the policy cannot be enforced through planning legislation.</p>	<p>Policy support is welcomed and we have provided comments on aspects which the Local Plan is unable to deliver to our colleagues in the Public health department.</p> <p><b>Green infrastructure</b> A change to this policy has not been made as the Local Plan addresses this topic through a range of other policies, including policy HS2 which requires the public realm of high streets to be enhanced by development, policy D2 which promotes greening of the public realm across the borough, and the policies of the Green and Water Spaces chapter.</p> <p><b>Application of healthy food standards</b> Comment noted. A commitment to improving the quality of food offer is already part of the development plan, through the London Plan (2021) Collaboration across the planning and health teams are underway and will enable conditions to be co-monitored and enforced.</p>
HS7 Delivery-led businesses	<p><b>Broad support</b> Support for the policy was expressed by Transport for London, a resident and two developers. Two residents expressed a need to protect carriers' jobs.</p> <p><b>Preferential location approach</b> A developer argued that requiring delivery led businesses to locate firstly on designated industrial land is unhelpful and does not reflect operational models. Another developer requested that policy support provision also on strategic sites expected to deliver employment uses.</p>	<p><b>Broad support</b> Support for the policy is welcomed.</p> <p><b>Preferential location approach</b> This policy has now changed to clarify the intended approach to the location of delivery-led businesses, which is more flexible than a sequential approach, and to include parts of site allocations expected to deliver employment uses as suitable locations.</p>

<p>HS8 Visitor accommodation</p>	<p><b>Spatial strategy for visitor accommodation.</b> A resident expressed concern that too many bed and breakfasts cause great population churn and should instead be resisted, e.g. on Romford Road. The Royal Docks team suggested that the policy should allow a longer walking distance from ExCeL of 20minutes and to also allow visitor accommodation within a similar distance from London City Airport.</p> <p><b>More quality criteria required to manage impacts and to support inclusive design.</b> Residents expressed concern with the quality criteria used to assess a recent hotel scheme, requesting additional attention to impacts on neighbouring uses such as schools. The LLDC recommended that the quality criteria for inclusive design be expanded beyond provision of wheelchair accessible rooms.</p>	<p><b>Spatial strategy for visitor accommodation</b> A change to this policy has not been made as the policy already seeks to control the location and overall quantum of new visitor accommodation proposals. Further, 15minutes is in keeping with the 15minuted neighbourhood concept that is threaded throughout the Plan. There is no justification to extend this in the case of the ExCel conference centre, while LCY sits within 15min of existing and future local centres, and new visitor accommodation should be directed to these locations in the first instance.</p> <p><b>More quality criteria required to manage impacts and to support inclusive design.</b> This policy implementation has now changed to clarify the need for visitor accommodation uses to consider their amenity and safety impacts and work proactively to mitigate these through the design of the scheme and the operation The implementation section also now refers to the additional inclusive design guidance provided in policies D1, D2 and D5 (formerly D6), which together address inclusive design standards on private and within public space.</p>
<p><b>Community Facilities</b></p>		
<p>CF1: Existing community facilities and health facilities</p>	<p><b>Support for the provision of community facilities and their protection</b> This policy was broadly supported by residents, Sport England and the Theatre Trust. A number of residents, West Silvertown Foundation and the Theatre Trust highlighted the importance of community facilities; and support for their protection. Community groups and a number of residents highlighted a desire for more social infrastructure, especially to meet the projected population growth.</p>	<p><b>Support for the provision community facilities and their protection.</b> Support for the policy is welcomed. The Local Plan continues to address the need for community facilities through protecting existing community facilities (SI1) and supporting new facilities (SI2, SI3 and SI4). The Neighbourhood chapter and relevant site allocations have been updated to reflect the updated evidenced need for community facilities, education and childcare facilities, built leisure facilities and playing pitches.</p>

<p><b>Conformity with the National Planning Policy Framework (NPPF)</b>          Whilst in general supportive of the policy, Sport England highlighted that part of the policy needed to be amended to ensure it was in conformity with the NPPF and Sport England policy.</p> <p><b>A need for facilities for young / older people and people who are homeless</b>          Residents and community groups raised the need for youth clubs and facilities for teenagers. A desire for spaces where young people and adults could mix was also expressed as well as a centre for independent living. The need for facilities for people who are older and those who are homeless was also raised.</p> <p><b>Affordability of community space</b>          Residents raised the need more affordable community facilities. The Theatre Trust supported the implementation text criteria which requires prices to reflect rates paid by community groups.</p> <p><b>Safe spaces</b>          The Plaistow Assembly wanted the chapter to address the need for safe spaces.</p>	<p><b>Conformity with the National Planning Policy Framework (NPPF)</b>          This policy approach has now changed to exclude sporting and informal recreation facilities from the previous exemption at Policy CF1.b (now Policy SI1). The policy has been amended to clarify intent and to ensure it fully aligns with the NPPF and Sport England policy.</p> <p><b>A need for facilities for young / older people and people who are homeless</b>          A change to this policy approach has not been made. We did not consider this change to be necessary as the policies in the Community Facilities chapter continue to protect existing (SI1) and support new spaces (SI2, SI3 &amp; SI4) which provide the type and quality of community facilities required by people living, working and visiting Newham's neighbourhoods. This includes the protection and delivery of facilities which young people and adults may use. The policy also continues to protect and deliver of facilities which people who are homeless may use. The delivery of specific facilities is the responsibility of other parts of the council and the community and voluntary sector.</p> <p><b>Affordability of community space</b>          A change to this policy approach has not been made. We did not consider this change to be necessary as Policy SI2 and SI3 continues to set out the requirement for community facilities to undertake a Social Value-Health Impact Assessment (Policy BFN3) and that facilities should enter into a Community Use Agreement. This is to ensure the long-term use and affordability of facilities.</p> <p><b>Safe spaces</b>          A change to this policy approach has not been made. We did not consider this change to be necessary as the creation of safe spaces is addressed in the Local Plan's design policies.</p>
--	---

	<p><b>Quality of evidence base</b></p> <p>A small number of residents and a community group, questioned the quality of the Community Facilities Needs Assessment (2022), its methodology, scope, approach to consultation and its findings.</p>	<p><b>Quality of evidence base</b></p> <p>This is the first time such a study has been undertaken and we acknowledge it is not, nor can it ever be a full and perfect picture of the intricacies of community facility provision. The Assessment has sought to better understand, protect and to guide the future development of Newham's social infrastructure. We have undertaken a number of studies to inform our policy approach. Newham's Community Facilities Needs Assessment (2022) is just one of these studies. The need for sporting facilities, playing pitches, educational uses, childcare or healthcare facilities are evidenced separately to the Community Facilities Needs Assessment (2022). The need for these uses, across the Plan period, have been informed by Newham's Built Leisure Needs Assessment (2023), Playing Pitch Strategy (2023), Places for All (2022), Childcare Sufficiency Assessment (2022) and through partnership working with Newham's Education, Parks and Leisure teams, HUDU and NHS partners.</p>
CF2: New and re-provided community facilities and health facilities	<p><b>General support</b></p> <p>This policy was broadly supported by residents, developers and Sport England.</p> <p><b>A need for more community facilities, social gathering places and health facilities</b></p> <p>Residents and one community group raised the need for more community facilities, social gathering spaces and health facilities.</p>	<p><b>General support</b></p> <p>Support for the policy is welcomed.</p> <p><b>A need for more community facilities, social gathering places and health facilities</b></p> <p>The Neighbourhood chapter and relevant site allocations have been updated to reflect the need for community facilities, education facilities and childcare facilities, built leisure facilities and playing pitches. This is based on updated evidence which has considered the existing community facility infrastructure and considered the impact of population growth to the end of the Plan period. Policy SI2.7 continues to include the provision for community facilities to enter into a Community Use Agreement, to make sure the space continues to meet the needs of its users.</p> <p><b>Town-centre first approach to the location of new social infrastructure</b></p>



	<p><b>Town-centre first approach to the location of new social infrastructure</b></p> <p>The City of London raised concerns about the location of new community facilities smaller than 1,000 sqm GIA. One developer suggested the policy needed to be more flexible to allow provision of community facilities outside of a town centre, to support the delivery of 15 minute neighbourhoods. Concerns about the inability of the voluntary sector to access town centre community space was also raised by one resident.</p> <p><b>Affordability and quality of community space</b></p> <p>Two residents and a community group raised the need for affordable community facilities. A lack of good quality affordable space for rent or lease from Newham Council was also raised. The Theatre Trust supported the implementation text criteria which requires prices to reflect rates paid by community groups.</p> <p><b>How will social infrastructure be delivered?</b></p> <p>One community group requested that there be clarity on how social infrastructure will be delivered.</p>	<p>This policy approach has now changed to allow greater flexibility to the location of small scale social infrastructure (smaller than 1,000 sqm GIA).</p> <p><b>Affordability of community space</b></p> <p>This policy approach has now changed to provide better guidance on what we consider an affordable and good quality community space to be. In addition, Policy SI2 requires proposals for all new and re-provided (including modernisation and/or expansion) facilities to provide a Social Value-Health Impact Assessment (see Policy BFN3). This assessment will include an understanding of the affordability of a premises for its intended users. We will pass this feedback regarding the affordability of LBN meeting rooms on to Newham's Resident Engagement and Participation team since this is not something the Local Plan can address.</p> <p><b>How will social infrastructure be delivered?</b></p> <p>This policy approach has changed following the completion of the Green and Water Infrastructure Strategy (2024), the Built Leisure Needs Assessment (2024) and the Playing Pitch Strategy (2024). These studies supplement the Community Facilities Needs Assessment (2022). Please see the New wording is now included in the Neighbourhoods chapter which sets out neighbourhood and site allocation requirements for social infrastructure.</p>
--	--	--

<p><b>Burial space</b> One neighbouring borough raised concerns that the Local Plan did not address the need for burial space.</p> <p><b>Greater focus on the voluntary sector and places of worship</b> One community group and two residents noted a lack of direct references to the voluntary community and faith sector in the chapter.</p> <p><b>Public toilets / cycle storage</b> Residents and community groups raised the need for more public toilets and for there to be cycle storage at community facilities. One developer asked for greater clarity around the provision of public toilets and at what scale of development are they expected.</p> <p><b>Swap shop / exchange centres / community fridges</b> Residents and one community group raised the need for spaces where people can exchange unwanted items and wanted provision of community fridges.</p> <p><b>Co-design of social infrastructure</b> Residents raised the need to ensure all age groups are included in the planning of community facilities. One community group requested greater clarity on how and</p>	<p><b>Burial space</b> A new burial space policy has been added to the Plan. Newham is actively working on its approach to addressing the need for burial space, including discussions with neighbouring boroughs.</p> <p><b>Greater focus on places of worship</b> The term community facility used in the Local Plan encompasses places of worship and many of the facilities run by the voluntary and charity sector. The rationale for improving the protection of these spaces and flexibility of where they can be located is based on our understanding of their importance to residents.</p> <p><b>Public toilets / cycle storage</b> A reference to a threshold for the provision of public toilets has been added to the policy. The policy approach has also changed to ensure better alignment with London Plan Policy S6. With regard to cycle storage, this policy now directs the reader to the transport policies.</p> <p><b>Swap shop / exchange centres / community fridges</b> A change to this policy approach has not been made as the implementation for Policy SI2 provides further guidance, including the provision of kitchen and food storage spaces. In addition, Policy W3 requires the provision of re-use and circular economy rooms in large developments to aid residents to share and donate items.</p> <p><b>Co-design of social infrastructure</b> This policy approach has now changed to ensure we are being clear about our expectations of the co-design process. This includes the need to speak with and consider the needs of different age groups. We have also provided greater clarity on the studies applicants should consult</p>
---	---

	<p>when developers engage with the community when consulting on their plans.</p> <p><b>Speculative community facilities</b> One developer raised a concern that Policy CF2 (now SI2) sought to resist speculative development. Conversely, one community group wished to see operators identified and secured as part of the early design of schemes.</p>	<p>and the requirement to engage with ward members, the Resident, Engagement and Participation team, community managers and the local community to understand existing provision and local need for the proposed facility.</p> <p><b>Speculative community facilities</b> A change to this policy approach has not been made as the Community Facilities Needs Assessment (2022) and the consultation undertaken with community groups as part of this work, has highlighted the downside of providing speculative community space. We do not wish to see vacant space or facilities which have been designed without considering the end user.</p>
CF3: Cultural facilities and sport and leisure recreation facilities	<p><b>General support</b> This policy was broadly supported by residents, the City of London, Sport England and the Theatre Trust. The Theatre Trust highlighted that the policy provides strong protection for Newham's valued cultural venues.</p> <p><b>Built Leisure Needs Assessment and Playing Pitch Strategy</b> Sport England raised the need for the completion of both the Built Leisure Needs Assessment and the Playing Pitch Strategy. This work is needed to ensure that a robust and up-to-date evidence base informs and supports Policy CF3 (now SI3). Sport England requested that the Neighbourhood chapter and site allocations in the Local Plan reflect the findings of the evidence base documents.</p> <p><b>Protection of sport and informal recreation facilities</b> Sport England was concerned that sites would only be protected if viable which is different to being needed.</p>	<p><b>General support</b> Support for the policy is welcomed.</p> <p><b>Built Leisure Needs Assessment and Playing Pitch Strategy</b> This evidence base has been refined and finalised and both have informed the latest requirements for facilities which are set out in the neighbourhood policies and site allocations.</p> <p><b>Protection of sport and informal recreation facilities</b> This wording change has been made which now aligns with the wording in the NPPF.</p>

	<p><b>Need for sport and informal recreation and cultural facilities</b> Residents raised the need to deliver sport and informal recreation facilities and cultural facilities to meet the project growth in housing. A number of residents raised the need for more leisure centres, fitness and gym facilities.</p> <p><b>Affordability of space</b> The Theatre Trust supports the criteria in the implementation text which requires prices to reflect rates paid by community groups. One resident raised the need for more affordable cultural spaces.</p> <p><b>Lee Valley Regional Park</b> The Lee Valley Regional Park Authority proposed amendments to ensure the Local Plan supports the growth and diversification of major sporting venues and visitor attractions such as the Lee Valley Velo Park and Three Mills Island.</p>	<p><b>Need for sport and informal recreation facilities</b> These policies already protect existing community facilities and supports new facilities. However, the Neighbourhood chapter and relevant site allocations have been updated to reflect the evidenced need for community facilities, education facilities, childcare facilities, built leisure facilities and playing pitches.</p> <p><b>Affordability of space</b> This policy approach has now changed to provide better guidance on what we consider an affordable space to be. In addition, Policy SI2 continues to require proposals for all new and re-provided (including modernisation and/or expansion) facilities to provide a Social Value-Health Impact Assessment (see Policy BFN3). This assessment will include an understanding of the affordability of a premise for its intended users.</p> <p><b>Lee Valley Regional Park</b> Wording changes have been made across the policies in this chapter to support the Lee Valley Regional Park.</p>
CF4: Education and childcare facilities	<p><b>Meeting the need for education space</b> One developer stressed the importance of education and childcare facilities needing to be based on an up-to-date needs assessment and suggested a wording change to Policy CF4 (now SI4).</p>	<p><b>Meeting the need for education space</b> We have made a wording change to Policy SI4 to reflect the requirement for applicants, on sites where a school is required to undertake an assessment at the time of application to ensure the latest data on identified need informs delivery. This will ensure the right size of school is delivered at the right time. The Places for All Strategy (2022) and our work with Newham's Education department have informed our approach to education requirements on site allocations. In response to</p>

	<p><b>More flexibility required to meet the need for education space</b> The Department for Education considered that Policy CE4.2 (now SI4) failed to provide flexibility and that it should allow for education to be delivered on windfall sites.</p> <p><b>Increasing capacity at existing education facilities</b> The Department for Education recommended the policy make specific reference to the requirement for developer contributions to increase the capacity of existing schools and the provision of new schools.</p> <p><b>Pupil Yield Modelling</b> A community group questioned the pupil yield model and its accuracy. The same community group raised concerns about the child yield model and the GLA School Roll projection.</p> <p><b>Design of education space</b> One community group suggested the policy needed to be clearer and wanted the policy to allow for the future growth / reduction of schools. The same community group wanted the site allocations to specify the size of the space given to a school. The Department of Education requested land to be safeguarded for future school expansion and for the inclusion of details such as phasing and minimum site area. However, it also noted that while it is important to</p>	<p>this evidence of need, the Regulation 19 approach remains the same in respect of the sites being allocated for primary, secondary and SEND education.</p> <p><b>More flexibility required to meet the need for education space</b> A change to this policy approach has not been made as Policy SI4.1.c already considers the issue of windfall education sites.</p> <p><b>Increasing capacity at existing education facilities</b> This policy approach has now changed to reflect that the specific requirements for developer contributions for education contributions will be confirmed at application stage.</p> <p><b>Pupil Yield Modelling</b> No changes have been made as a result of these comments as the model is considered to be robust and as accurate as possible. To reflect the need to remain responsive, Policy SI4 requires developers to engage with the Council's education department at the point of delivery to ensure the right size school is delivered at the right time.</p> <p><b>Design of education space</b> A change to this policy approach has not been made as the design requirements of individual school sites will need to be assessed at the point of application and the policy already makes provision for the need for a flexible design to allow for future growth.</p>
--	---	--

	<p>provide clarity, the policy also needed to provide a degree of flexibility about site specific requirements.</p> <p><b>Access to green space</b> Residents and one community group raised the importance of providing green space within education settings. The community group asked for the policy to define a set amount of green space to be delivered.</p> <p><b>Sharing of facilities with the wider community</b> Sport England and residents supported the shared use of education facilities by the wider community. One community group wanted the policy to provide further explanation on the sharing of facilities with the wider community. The same community group questioned if and how shared space in education settings would be deliverable / viable.</p>	<p><b>Access to green space</b> A change to this policy approach has not been made as the policy already makes provision for the need to education facilities have access to outdoor green and play spaces and to ideally be located within a 15-minute walking distance of a park.</p> <p><b>Sharing of facilities with the wider community</b> Support for the policy is welcomed. However, the policy approach has now changed to ensure the ambition of securing shared use of education spaces is deliverable. Policy SI4 now includes the requirement for applications where these is shared use of education facilities to enter into a Community Use Agreement.</p>
<b>Inclusive Economy</b>		
J1 Employment and growth	<p><b>General Support</b> This policy is broadly supported by the City of London, the Port of London Authority (PLA), the Greater London Authority (GLA), the London Legacy Development Corporation (LLDC) and a number of developers. In particular, London City Airport, the PLA and some developers indicated support for the policy approach on Thameside West Strategic Industrial Land (SIL), Thameside East SIL, Rick Roberts Way North Local Industrial Location (LIL), Albert Island LIL and Ashburton Terrace Local Mixed Use Area.</p>	<p><b>General Support</b> Support for the policy is welcomed.</p>

<p><b>Approach to office space</b> The GLA supported the general policy approach and considered it in line with the London Plan. A developer is supportive of the approach to direct major offices to Stratford Metropolitan Centre but recommended extending the use to research and development. A developer requested greater flexibility to allow the delivery of office floorspace in proximity to Stratford Metropolitan Centre. A developer requested further clarification on the evidence base on supply.</p> <p><b>Approach to industrial land</b> The general policy approach to industrial land is broadly supported by the GLA, the PLA and many developers. However, the GLA requested greater clarity regarding where new industrial land would be delivered. Some developers requested for greater clarity for the approach in site allocations and one of them objected the delivery of industrial use in site allocations.</p> <p><b>Industrial and residential buffering</b> A developer supported the buffering approach but suggested adding more detail requirements to protect industrial uses.</p> <p><b>Revision of employment designation boundaries</b> Some developers requested changes to the boundaries of employment designations, such as expanding London Industrial Park SIL to Beckton Alps and releasing parts of Thameside West SIL to allow residential uses in the</p>	<p><b>Approach to office space</b> A wording change has been made to allow research and development floorspace in Stratford Metropolitan Centre. No changes have been made to allow office floorspace around Stratford Metropolitan Centre as the town centre first approach is supported by the Employment Land Review (2022) which outlines that there is an oversupply of office floorspace in the borough. Detailed evidence for office needs and supply are set out in the Employment Land Review (2022).</p> <p><b>Approach to industrial land</b> Changes have been made in Local Plan Policies J1 and J2 to better reference the London Plan and to provide clarity on the approach to deliver industrial uses in site allocations, including a list of specific site allocations for such delivery. No changes have been made in response to the objection to industrial floorspace provision in site allocations as we require industrial land to be delivered on site allocations where they were created through managed release on Strategic Industrial Locations (SILs) in the adopted Local Plan to protect some of the lost capacity, or where they will function as a buffer between industrial land and residential neighbourhoods.</p> <p><b>Industrial and residential buffering</b> Additional details have been added in Local Plan Policy J1 and D6, and relevant site allocations to provide greater clarity on the existing buffering approach.</p> <p><b>Revision of employment designation boundaries</b> No changes have been made to the boundaries as the proposed boundaries are supported by our evidence base and remain necessary to achieve and balance the Plan's objectives regarding the protection of open space and delivery of sufficient industrial capacity.</p>
--	---

	<p>approved scheme and Mayer Parry Wharf to be redesignated from LMUA back to SIL.</p> <p><b>Allowing sports facilities in designated employment locations</b> Sport England recommended adding sports facilities into employment land as they also generate employment opportunities.</p> <p><b>Allowing residential use on employment land</b> The LLDC and a number of developers requested to allow residential uses at Bow Goods Yard SIL, Beckton Riverside SIL and Cook's Road LIL, and to allow residential-led development at Beeby Road LMUA.</p> <p><b>Allowing ancillary uses in Land East of London City Airport</b> The London City Airport suggested changes in policy to allow the site to deliver research and training use as an aviation centre of excellence.</p> <p><b>Requirement for economic strategy submission requirement</b></p>	<p><b>Allowing sports facilities in designated employment locations</b> This change has not been made as the Local Plan adopts an evidenced approach, which aligns with transport and town centre policies, to deliver new leisure facilities to meet the needs as informed by the Built Leisure Needs Assessment (2024).</p> <p><b>Allowing residential use on employment land</b> No changes are proposed to the SILs and LMUAs, noting that residential development is allowed within LMUAs so long as the employment uses are re-provided on site. For the SILs, these sites are designated for industrial intensification which follows the finding in the Employment Land Review (2022) that the pipeline of supply is not sufficient to meet need and that therefore all industrial land must be protected and optimised solely for industrial use. We have therefore taken a consistent approach to all designated industrial land in the borough, including those sites previously within the LLDC's planning remit. Cook's Road is changing from LIL to LMUA, as recommended by the Employment Land Review, to allow the permitted residential uses (which is under implementation) to come forward.</p> <p><b>Allowing ancillary uses in Land East of London City Airport</b> This wording change has been made to allow such provision.</p> <p><b>Requirement for economic strategy submission requirement</b> Wording change has been made to provide greater clarity on the requirement including threshold and scope of the Economic Strategy.</p>
--	--	---



	<p>One developer raised concern that the Economic Strategy requirement to be applied for all developments will limit investment in the borough.</p>	
J2 New employment floorspace	<p><b>General Support</b> This policy is strongly supported by the City of London and developers.</p> <p><b>Intensification of industrial uses</b> A developer supported the intensification approach but raised deliverability concerns and requested greater flexibility in case uses cannot be intensified on SILs and LILs.</p> <p><b>Allowing employment floorspace outside designated locations</b> A developer suggested further flexibility for the delivery of employment space outside of designated employment locations.</p> <p><b>Sequential test and impact assessment</b> One developer objected to the requirements to submit sequential test and impact assessment for office spaces outside town centres and Micro Business Opportunities Areas.</p>	<p><b>General Support</b> Support for the policy is welcomed.</p> <p><b>Intensification of industrial uses</b> This change has not been made as the Employment Land Review (2022) indicates that the pipeline supply of industrial land is not sufficient to meet need. As such, the Local Plan requires industrial development in both SILs and LILs have to take the form of intensification to deliver further industrial floorspace. There is already sufficient flexibility within the policy for alternative approaches when intensification cannot be delivered.</p> <p><b>Allowing employment floorspace outside designated locations</b> No changes have been made as the flexibility to deliver employment uses outside the designated areas or site allocations is allowed subject to requirements to bring economic benefit to the local community. We consider this provides sufficient flexibility, acknowledging the need for alternative priority land uses, including housing and the economic benefits of ensuring there is a sufficient, but not oversupply of employment land.</p> <p><b>Sequential test and impact assessment</b> This change has not been made as the town centre first approach is supported by the Employment Land Review (2022) as there is oversupply of office floorspace in the borough and the sequential test and impact assessment requirement is to ensure the vitality and viability of town centres. This approach is in conformity with the London Plan.</p>

	<p><b>Employment floorspace to support green economy</b> A community group suggested a list of measures to support green industries including the offering affordable workspaces for green industries.</p>	<p><b>Employment floorspace to support green economy</b> No changes have been made as all developments incorporating employment floorspace are required to support transition to a greener economy.</p>
J3 Protecting employment floorspace	<p><b>General Support</b> This policy is supported by the City of London and developers.</p> <p><b>No net loss of industrial land</b> A developer strongly supported this approach to SILs and LILs but suggested this requirement applies to land instead of floorspace to avoid loss of yard space provision. One developer requested the removal of the no net loss requirement due to inconsistency with the London Plan. One developer objected to the requirement for no net loss of industrial floorspace in LMUAs.</p> <p><b>Clarity of requirements for various designations</b> Developers requested greater clarity to the application of the no net loss approach, the requirement to submit marketing evidence and 15-minute mapping to justify loss of employment floorspace across employment designations and site allocations.</p>	<p><b>General Support</b> Support for the policy is welcomed.</p> <p><b>No net loss of industrial land</b> These changes have not been made as the Employment Land Review (2022) indicates that the pipeline supply of industrial land is not sufficient to meet need and highlights Newham's important strategic role as a key industrial property market area and in close proximity to the Central Activity Zone. As such, the Local Plan requires industrial development in all SILs, LILs and LMUAs have to take the form of intensification to deliver further industrial floorspace and not to release land for the delivery of, or co-location with, residential. The GLA has indicated they are supportive of this approach (see their representations). Also, the policy is clear that industrial intensification in capacity also includes yard space.</p> <p><b>Clarity of requirements for various designations</b> The requirement to submit marketing evidence and 15-minute mapping for proposals which result in loss of employment floorspace on site allocations are now removed in recognition that these sites have been subject to an allocation process. More clarity is added in the policy on the approach to no net loss on different employment designations, town centres, site allocations and non-designated sites.</p>

<p>J4 Delivering Community Wealth Building and Inclusive Growth</p>	<p><b>General Support</b> This policy is broadly supported by developers, City of London and a community group.</p> <p><b>Developer contributions on local training and employment</b> A number of developers requested greater flexibility with regards to the requirement for contributions to local training and employment, and questioned on the viability of this requirement.</p> <p><b>Enhancing local employment quantity and quality</b> Residents suggested further requirements to improve local employment such as suggesting the council commission local services, attract local entrepreneurs and big companies by offering low rents, providing training courses, supporting apprenticeships, prioritising employment for low income families and long term residents. Residents also suggested adding details on healthy workplace and job discriminations.</p> <p><b>Green economic growth</b> One resident and developers supported the recognition of green economy in the policy but requested greater clarity on the meaning of green technology and industries.</p> <p><b>Other requirements</b> One developer requested greater flexibility on the requirement of childcare facilities while another developer</p>	<p><b>General Support</b> Support for the policy is welcomed.</p> <p><b>Developer contributions on local training and employment</b> No changes have been made to this approach. We did not consider this change to be appropriate as there is a need for developers to contribute to high quality economic opportunities for the local residents and deliver our inclusive Economy objectives. This approach was previously found sound and agreed in the adopted local plan and has proved deliverable over the plan period. The financial contribution calculation was tested in the whole plan viability assessment.</p> <p><b>Enhancing local employment quantity and quality</b> No changes have been made as the policy has already set out a list of comprehensive requirements to achieve the policy aim in creating high quality economic opportunities to support community wealth building for all local residents And further suggestions are not deliverable via planning policy.</p> <p><b>Green economic growth</b> Definitions have been added in the Glossary.</p> <p><b>Other requirements</b> No changes have been made as the level of flexibility is considered appropriate in the policy. Childcare facilities will only be required where</p>
---	---	---

	questioned the viability of affordable workspace provision requirement.	the additional need cannot be met by existing provisions while provision of new affordable workspace is not a compulsory requirement.
<b>Homes</b>		
H1 Meeting housing needs	<p>Developers and the GLA raised concerns that Newham was unable to meet its housing target in the London Plan, and whether there was insufficient flexibility in other policies that impact our housing delivery (for example, tall buildings, employment and family housing policies being too restrictive and negatively impacting viability).</p>	<p>We have updated our housing target, following updates to the design-led capacity testing of a number of sites, including two new site allocations identified through comments on the draft Regulation 18 Local Plan. We have also moved on the start date for our housing target by one year, to reflect the housing completions recorded for financial year 2022/23.</p> <p>No further policy flexibility is considered necessary. While we are still unable to meet our London Plan housing target, primarily due to delays in site delivery, we have sought to optimise housing delivery in line with the London Plan's design-led approach while also ensuring the plan helps to create successful sustainable mixed-use places that make the best use of land. Further information is outlined in the Site Capacity and Housing Trajectory Methodology Note</p>
H2 Protecting and improving existing housing	<p><b>Family housing protections</b> Residents supported the protection of family-sized homes. A landlord felt the policy should be more flexible on allowing more accommodation for sharers.</p> <p><b>Repairs</b> Some residents raised the difficulties they had faced in getting repairs to their homes and advocated for faster repairs in the borough.</p>	<p><b>Family housing protections</b> We have retained the policies protecting family housing, and allowing for subdivisions or conversions in exceptional circumstances.</p> <p><b>Repairs</b> We have not amended our policy approach as repairs and improvement works often don't require planning permission. Where repairs and improvement works or conversions require planning permission, proposals will be expected to meet the relevant quality requirements of the Local Plan, including Policy H11 requirements around housing design quality.</p>
H3 Affordable housing	<p><b>Affordable housing targets</b> While developers were broadly supportive of adopting the London Plan's threshold approach to affordable housing</p>	<p><b>Affordable housing targets</b> Our affordable housing targets have now changed to require new residential developments on sites delivering ten dwellings or more to</p>

	<p>delivery, they considered the affordable housing targets in the Plan were unlikely to be deliverable in all contexts due to viability challenges. Residents stated that the delivery of truly affordable housing and particularly social rent housing was extremely important and key to ensure the borough remained liveable for a range of residents. Councillors felt that the borough should deliver 50 percent of all new housing as social rent homes, and these should help to house those in temporary accommodation.</p> <p><b>In-house viability advice</b> Some residents felt it was important to appoint in-house viability expertise. Councillors felt that the Council should robustly scrutinise viability assessments, and consider new models of viability that could help deliver more affordable homes.</p> <p><b>Approach to gasholder sites</b> A developer wanted the borough to clarify that gasholder sites could follow the threshold approach where they deliver 35% affordable housing.</p>	<p>provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing. This change has been made to respond to the ever increasing need for social rented homes in the borough, along with the significant and multiple affordability challenges our residents face. All social rent homes delivered in the borough will be allocated to people on Newham's housing waiting list.</p> <p><b>In-house viability advice</b> No change has been made to the policy approach as the policy already requires independent scrutiny and does not specify who this is undertaken by. There are a limited range of suppliers with significant expertise to undertake reviews of viability assessments. Newham has appointed BNP Paribas as a dedicated viability consultant for the Council. Given very significant restrictions of grant available currently from central government to fund affordable housing, we did not consider alternative viability models would be successful at delivering more affordable homes.</p> <p><b>Approach to gasholder sites</b> Due to the change to affordable housing targets, there is no variation in affordable housing delivery requirements according to land use in the revised wording for Policy H3.</p>
H4 Housing mix	<p><b>Family housing targets</b> Residents showed broad support for the delivery of more family-sized homes, particularly where these were affordable. Councillors felt our family housing target should be more ambitious. Developers felt targets for the delivery of family-sized homes, including homes with four or more bedrooms on site allocations would have a</p>	<p><b>Family Housing targets</b> Newham's family housing target has not been amended. We did not consider a change to the target to be appropriate as Newham's latest evidence of housing need suggests that 59% of housing need across the Local Plan period will be for family-sized homes with three or more bedrooms, making it one of the borough's most significant housing needs. Our target for the delivery of family sized homes, with 5%</p>

	<p>disproportionately negative impact on viability. Developers and the GLA felt the policy should be more flexible in allowing developments to follow the fast track route even where there was a shortfall against family housing targets.</p> <p><b>One bedroom and studio unit policies</b> Developers felt the policy was over restrictive in its requirements around delivering one bedroom and studio units. Developers felt that smaller units should be recognised for their role in freeing up family housing. Their delivery should be prioritised near town centres, in opportunity areas and highly accessible locations. They should also be prioritised in build to rent schemes and specialist housing for older people.</p> <p><b>Portfolio approaches</b> Developers and the LLDC wanted further clarity on the acceptability of securing portfolio approaches to the delivery of affordable and family housing.</p>	<p>affordable four beds on site allocations, is set below the need level identified in our evidence base, recognising this will improve the viability of scheme delivery. Where this target or affordable housing targets cannot be met, applicants will need to robustly justify this through the submission of a viability assessment.</p> <p><b>One bedroom and studio unit policies</b> This policy approach has now changed to incorporate greater flexibility around the provision of studio units to improve the viability of residential schemes. Our target for no more than 15 per cent one-bedroom homes on major developments has not been amended, as this target has been informed by evidence of housing needs.</p> <p><b>Portfolio approaches</b> Policy H4 now includes an additional clause on how portfolio approaches to the delivery of family and affordable housing will be assessed. Developments within a portfolio delivering additional affordable housing and/or family homes should be located in Newham, and completed and ready for occupation prior to developments that deliver) below the policy target(s).</p>
H5 Build to Rent housing	<p><b>Resident views on build to rent</b> Residents provided mixed feedback on the policy. While there was support for the policy, some residents were concerned about the delivery of private rented sector homes, in particular because they seemed less affordable.</p>	<p><b>Resident views on build to rent</b> We note the concerns related to the affordability of rented homes. Our policy approach for affordable housing delivery on these schemes has now changed to reflect our updated affordable housing target in H3. This will help to deliver a greater proportion of build to rent affordable homes at London Affordable Rent levels.</p>

	<p><b>Affordable housing for Build to Rent</b> While developers supported the inclusion of a standalone policy on build to rent housing, they opposed the affordable housing requirements in the Local Plan, suggesting instead they should reflect the wording of the London Plan. Some developers also raised concerns on the requirements for a dual viability assessment, comparing for sale and for rent scheme outcomes.</p> <p><b>Housing mix and build to rent</b> Developers felt that Build to Rent schemes should be subject to more flexible policies around housing mix, as take up of units to date has been mainly of one and two bedroom homes.</p> <p><b>Revenue subsidy</b> The Greater London Authority raised concerns about whether the requirement for payments into a revenue subsidy fund where affordable housing targets could not be met remained appropriate.</p>	<p><b>Affordable housing for Build to Rent</b> Our affordable housing target for Build to Rent homes is based on our evidence of housing needs. As such, our Build to Rent target has been changed to reflect the tenure split of our affordable housing target set out within policy H3. Dual viability assessment requirements have been retained as they allow officers to transparently compare the viability impacts of build for sale vs build to rent.</p> <p><b>Housing mix and build to rent</b> We did not consider this change to be appropriate as our evidence of housing needs demonstrates a clear need for three bedroom properties, rather than two or one bedroom homes. Furthermore, we do not consider there is robust evidence to demonstrate why build to rent developments should deliver fewer family homes. It is important that all residents, including families, have access to more secure forms of rented accommodation.</p> <p><b>Revenue subsidy</b> This requirement in the policy has now been removed.</p>
H6 Supported and specialist housing	<p><b>Resident views on specialist housing</b> Residents broadly supported the policy, and stressed the importance of delivering homes to meet the needs of people with support needs.</p> <p><b>Local need for accommodation</b> Providers and developers of specialist accommodation felt it was important that provision was supported where it was needed and in accessible locations. One developer</p>	<p><b>Resident views on specialist housing</b> Support for the policy is welcome.</p> <p><b>Local need for accommodation</b> Policy clauses around local need (as defined and determined by Newham commissioning teams) have been retained, recognising the</p>

	<p>raised concerns on the local occupancy requirement in the policy. They also considered that accommodation should be supported where residents required much lower levels of care or weren't directly commissioned by the Council.</p> <p><b>Loss of specialist housing</b> A developer felt the policy should be more flexible, requiring less strict criteria for the release of accommodation.</p>	<p>need to balance the delivery of needed specialist and supported accommodation with general needs housing..</p> <p><b>Loss of specialist housing</b> This policy approach has now changed to include an additional option for the release of specialist accommodation. This involves accommodation being offered to commissioning teams. If commissioning teams consider the existing accommodation provision is not needed locally, then accommodation can be lost to other residential uses.</p>
H7 Housing for older people	<p><b>Resident views on accommodation for older people</b> Residents broadly supported the requirements set out in the policy, and the delivery of more accommodation for older people.</p> <p><b>Definition of older people's accommodation</b> A developer considered that accommodation for older people wasn't clearly defined in the policy.</p> <p><b>Requirements being too restrictive</b> A developer felt the policy requirements were too restrictive, including requirements around affordable housing, local need for the accommodation, location requirements and provision of main town centre uses.</p>	<p><b>Resident views on accommodation for older people</b> Support for the policy is welcomed.</p> <p><b>Definition of older people's accommodation</b> The wording of Policy H7 now clarifies that policies H6 and H7 apply to those forms of older-persons housing where care is provided (sheltered housing, extra care and care homes). Age-restricted general market housing should be assessed against policy requirements applied to general needs housing, including affordable housing and housing mix requirements.</p> <p><b>Requirements being too restrictive</b> Policy H7 has now changed to further clarify those forms of specialist accommodation for older people most needed in the borough. of the requirement for accommodation to be close to town centres has now been softened to exempt care home accommodation from this</p>



	<p><b>Design requirements</b> A developer raised that older persons accommodation that isn't assessed by the Care Quality Commission should be subject to different design requirements</p>	<p>requirement, and remove the requirement for accommodation to be located on major roads. This policy also now clarifies that the provision of community facilities in developments for older residents is encouraged, rather than compulsory to deliver.</p> <p><b>Design requirements</b> This policy approach has now changed to allow for assessment against HAPPI principles where accommodation for older people is not regulated by the Care Quality Commission.</p>
H8 Purpose-built student accommodation	<p><b>Restrictive requirements</b> Residents broadly supported the policy and restricting Purpose build student accommodation. Developers felt the policy was too restrictive, particularly requirements limiting additional delivery of purpose-built student accommodation in Stratford and Maryland and requirements for nominations agreements with Newham-based campuses.</p> <p><b>Community facilities requirement</b> Developer's felt developments shouldn't have to provide community facilities to reduce impact on nearby centres.</p> <p><b>Affordability</b> Some residents recommended purpose built student accommodation delivery be restricted and made more affordable</p>	<p><b>Restrictive requirements</b> This policy approach has now changed to explicitly support delivering existing campus development expansions in the Stratford and Maryland neighbourhood. Elsewhere in the borough, delivery of purpose built student accommodation will be supported in town centres or, where developments would create an oversaturation of purpose built student accommodation delivery, only where adjacent to existing campuses. The policy now also provides more flexibility for higher education providers to sign up to nominations agreements, albeit additional requirements apply where developments would result in an over-concentration of student bed spaces.</p> <p><b>Community facilities requirement</b> This policy approach has now changed to reflect that the objective of this policy is to relieve pressures on local public spaces for study (such as libraries) and gyms.</p> <p><b>Affordability</b> Policy H8 affordable housing requirements have been updated to require at least 60 per cent affordable student accommodation.</p>

<p>H9 Houses in Multiple Occupation and Large-Scale Purpose-Built Shared Living</p>	<p><b>Support and opposition to delivering more houses in multiple occupation</b> Residents and developers had mixed views on the delivery of houses in multiple occupation, with some feeling the policy was too restrictive. Other residents felt the delivery of houses in multiple occupation should be controlled given their amenity impacts.</p> <p><b>Rent caps</b> Residents supported the rent caps proposed by the policy for houses in multiple occupation.</p> <p><b>Payments in lieu</b> Developers objected to the payment in lieu requirements when affordable housing isn't provided on site, being higher than those in the London Plan.</p>	<p><b>Support and opposition to delivering more houses in multiple occupation</b> The policy position has remained broadly similar, recognising there are some areas where the delivery of houses in multiple occupation should be supported to meet the need of single residents, while also balancing their delivery against the much higher need for family homes. In the majority of cases therefore, the delivery of houses in multiple occupation should not result in the conversion of family-sized accommodation. More intensely occupied larger houses in multiple occupation will be directed to Town and Local Centres and along nearby major roads, so residents have better access to services and supporting facilities. Similarly, these locations can help mitigate amenity impacts from more intensely occupied forms of multi-occupancy housing.</p> <p><b>Rent caps</b> While support for the policy was noted, this policy approach has now changed to apply the requirement for rents to be capped at Local Housing Allowance Shared Accommodation rates only to those homes secured for Newham Care Leavers and single homeless people. This is due to this requirement being too onerous to deliver via a legal agreement.</p> <p><b>Payment in lieu</b> The policy position reflects that cash in lieu payments do not accord with the objectives of Policy H4, which seeks to deliver a mix and balance of housing types and sizes. Therefore, higher cash in lieu contributions reflect that developments that were unable to provide on-site affordable housing were likely to have higher sales/rent values than developments delivering affordable homes on site, and that there is an onus on the Council to deliver these affordable homes to make up for this shortfall.</p>
---	--	---

H10 Gypsy and traveller accommodation	Residents felt the Council should be providing more pitches to meet the needs of the Gypsy and Traveller community	This policy's justification text has now changed to set out that we will seek to meet the need for new pitches for members of the community identified in our evidence base, reflective of recent changes to national legislation. We will seek to do this through the Council's Small Sites Options Appraisals and Modular construction programme, which is reviewing how best to use a range of small areas of land in the Council ownership.
H11 Housing Design Quality	<p><b>Detailed policy requirements</b> Residents broadly supported the policy requirements, with Councillors also supporting better quality space standards. Developers raised concerns around a number of clauses in the policy, saying these were too detailed for a Local Plan policy, and were more akin to Supplementary Planning Guidance.</p> <p><b>Housing adaption for people without a physical disability</b> A charity felt that design requirements should consider the cultural needs of residents and the needs of neurodivergent people or people with learning difficulties.</p> <p><b>Membership model</b> Developers questioned the legal basis for requirements around on-site services and facilities needing to be provided via a membership model, available to all residents at an equivalent cost of using a Council facility.</p> <p><b>Portfolio approach</b> Developers sought additional flexibility on providing wheelchair adapted properties through a portfolio approach.</p>	<p><b>Detailed policy requirements</b> This policy has now changed to be less prescriptive in its requirements, albeit key design requirements have been retained in the policy wording.</p> <p><b>Housing adaption for people without a physical disability</b> A new policy clause has been added that requires developments referable to the Mayor of London to design a proportion of social rent rooms in accordance with the recommendations of Newham's forthcoming 'Housing design needs study'. This study will consider the design needs of neurodivergent residents, residents with learning disabilities and residents on Newham's housing waiting list.</p> <p><b>Membership model</b> This policy approach has now changed to require these facilities to be of comparable cost of other facilities (private and Council-run) in the locality, and to clarify how the policy should be implemented.</p> <p><b>Portfolio approach</b> We have retained the portfolio approach wording, requiring developments delivering additional adapted homes to be completed and ready for occupation prior to developments that deliver wheelchair</p>

		user dwellings below the policy target. This is to ensure development portfolios do not result in an under delivery of wheelchair adapted homes against policy targets.
<b>Green and Water Spaces</b>		
GWS1 Green spaces	<p><b>General support</b> Residents, the GLA, Environment Agency, Natural England, Sport England, London Historic Parks and Gardens, the Woodland Trust, City of London, Lee Valley Regional Park Authority, the London Legacy Development Corporation and a number of developers broadly supported the comprehensive approach taken in this policy. Support for the crossover with other Local Plan policies regarding climate change, air quality, biodiversity and SuDs was also recognised.</p> <p><b>Definition of green space</b> Two developers disputed the definition of green space / open space in the Local Plan.</p> <p><b>Protecting green space</b> Residents and one community group highlighted the many benefits green space brings to their lives and the importance of providing space for nature. The importance of green space in helping provide resilience to climate change was also raised. The Environment Agency and CPRE supported the approach to the protection of green space. A few developers objected to the policy, stating it was too restrictive.</p> <p><b>Delivering new green space</b> Residents expressed a strong desire for more green space</p>	<p><b>General support</b> Support for the policy is welcomed.</p> <p><b>Definition of green/open space</b> This policy approach has now changed to ensure the definition of green space provided is clear and aligns with both the London Plan and NPPF.</p> <p><b>Protecting green space</b> The policy continues to protect and improve Newham's green spaces. The borough currently experiences shortfalls in publicly accessible green space, areas for community and food growing and play space. However, the policy does include exceptional circumstances which could be met in order to develop on green space.</p> <p><b>Delivering new green space</b> Newham's Green and Water Infrastructure Study (2024) is the evidence</p>

	<p>to meet the projected population growth. There is also a need for multifunctional space which is of a reasonable size. Two developers, one community group, the Royal Docks Team and the London Legacy Development Corporation disputed site specific green space allocations.</p> <p><b>Improving existing green space</b> Residents supported the desire to improve existing green space, with strong aspirations to see the quality of green spaces improved. This included improvements to biodiversity and provision of play space and informal recreation activities. The Environment Agency supported the approach taken to support the delivery of multifunctional green space.</p> <p><b>Exceptional circumstances for building on green space</b> One community group disputed the use of the 'exceptional circumstance' test for any development on green space which, it stated, should only be used in respect of Metropolitan Open Land and the Green Belt. One community group expressed concern that the clause would lead to the loss of green space and harm to biodiversity. The CPRE wanted to see the list of exceptions substantially reduced. One developer requested greater flexibility to ensure the policy did not compromise the viability of a development. One developer disputed the exceptional circumstances in policy, stating that the clause should not exclude Metropolitan Open Land.</p>	<p>base which supports our policy approach to the borough's green, water, access to nature, play and growing space needs. This evidence has informed the latest requirements for green space set out in the site allocations. The requirement for green space (including the need for play and community growing space) has fed into the design based capacity testing as set out in the Site Allocation and Housing Trajectory Methodology Note (2024) to ensure it is deliverable with the other elements the site is providing.</p> <p><b>Improving existing green space</b> Support noted. The policies in the Green and Water Spaces chapter continue to highlight the importance of multifunctional green space and seek to protect and improve the quality of Newham's green space assets.</p> <p><b>Exceptional circumstances for building on green space</b> We have not changed this policy as it continues to protect green space, while providing clear and very limited criteria where, in exceptional circumstances, development on green space would supported. To be allowed, the proposed development would need to deliver a benefit to those living in Newham and improve the use and quality of the green space. The policy also clearly states there must be no detriment to the natural environment.</p>
--	--	--

<p><b>Newham publicly accessible green space standard</b> The GLA supports the development of a ‘Newham Open Space standard’ on a per population basis. There was a strong desire from residents, community groups, the CPRE and London Historic Gardens Trust for the policy to be more ambitious about the provision of publicly accessible green space per head of population.</p> <p><b>Improved connectivity / access to green space</b> Residents, the Woodland Trust, the Environment Agency, the Canal and River Trust, Lee Valley Regional Park, City of London and two developers supported the approach to improving green space connections for the benefit of people and wildlife. Residents highlighted the virtues of the Greenway and wanted to see further investment in this space. They also wanted to see improvements to access in the east of the borough and along the River Roding. Residents raised the need to improve the biodiversity of incidental spaces, streets and footpaths to deliver improvements to green space links.</p> <p><b>Approach to Metropolitan Open Land / Green Belt</b> Thames Water and a number of developers with sites containing Metropolitan Open Land objected to and sought to delete the designation. The CPRE requested the retention of the Beckton Sewage Works Metropolitan Open Land designation.</p> <p><b>Management of new green space</b> Developers and the City of London expressed concern with clause five of the policy. The clause includes the ability for</p>	<p><b>Newham publicly accessible green space standard</b> We have not made a change to the standard, as this was created using up-to-date evidence to support this chapter and its targets. Given the projected population increase, it is considered to be an ambitious but realistic level of publicly accessible greenspace provision.</p> <p><b>Improved connectivity / access to green space</b> The policy clauses around improving connectivity have been retained but, following the completion of the Green and Water Infrastructure Study (2024), we have added new wording to the relevant neighbourhoods and site allocations which now give detail on where we would like to see improvements to green space connections.</p> <p><b>Approach to Metropolitan Open Land / Green Belt</b> A change to this policy approach has not been made as London Plan Policy G3 stipulates that Metropolitan Open Land boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified. A review of Newham’s Metropolitan Open Land and Green Belt has been undertaken ensure that the existing designations reflected the NPPF (2023), London Plan (2021) and Newham’s strategic requirements for green infrastructure.</p> <p><b>Management of new green space</b></p>
---	---

<p>the Council to have ownership of new green space on site allocations and new green space which will function as a local park. One developer broadly welcomed this clause.</p> <p><b>Maintenance of green space</b> Residents raised the need for green spaces in the borough to be properly maintained, the issue of litter was frequently highlighted.</p> <p><b>Growing space</b> Residents expressed a desire for more growing space in Newham, highlighting the current low provision. They would like the policy to be more ambitious regarding the amount of space provided per head of population. Plaistow Assembly wanted to see a policy for community gardens. One community group asked for growing space to be mandatory on school sites.</p> <p><b>Playing fields</b> Sport England raised the need to make a wording change to Policy GWS1.1e, to state 'playing field', and not just 'playing pitches'. Sport England supported the approach in Policy GWS1.2, to ensure the local replacement of any lost playing field and the policy support for ancillary sport facilities on green spaces. Sport England wanted to see the policy clause GWS1.4 to also consider new playing field provision.</p>	<p>A change to this policy approach has not been made as it is considered to be suitably flexibly to allow for other forms of ownership and management.</p> <p><b>Maintenance of green space</b> A change to this policy approach has not been made as the policy already includes mechanisms to ensure maintenance of new parks is secured.</p> <p><b>Growing space</b> The policy continues to require the integration of food growing opportunities where feasible and practical and Policy SI4 continues to require education facilities to maximise biodiversity on site, including the provision of trees gardens, and food growing spaces. However, following completion of the Green and Water Infrastructure Study, the Neighbourhood chapter and site allocations have also been updated to stipulate where we would expect to see new community growing space.</p> <p><b>Playing fields</b> This wording change has been made.</p>
---	---

	<p><b>Dogs</b> A number of residents wanted to see greater control of dogs in green and play spaces and the enforcement of the rules relating to dogs.</p> <p><b>West Ham Nursery Site</b> The City of London is exploring opportunities to open-up part of the West Ham Park Nursery Site as new green space. This proposal also includes the delivery of housing/employment uses on part of the Nursery Site. Residents, two community groups, London Historic Gardens Trust and the CPRE strongly objected to the idea of developing the Nursery Site at West Ham Park. Instead, they would like to see the site become a publicly accessible green / community growing space. They also requested an update to the Policies Map, to designate the West Ham Nursery Site as green / community growing space.</p> <p><b>Newham needs a planned approach to its green, water, play and growing spaces</b> Residents called for a strategic approach to the planning and investment of Newham's green spaces including its growing and play spaces.</p>	<p><b>Dogs</b> The Local Plan is unable to make further changes regarding dogs. However, it should be noted there are 5 dogs on leads control orders in Newham, please see here for further information: <a href="https://www.newham.gov.uk/public-health-safety/dog-care-control">https://www.newham.gov.uk/public-health-safety/dog-care-control</a>. We have also provided the Parks team with the comments relating to this issue.</p> <p><b>West Ham Nursery Site</b> Following the completion of the Green and Water Infrastructure Strategy (2024), the nursery site, in recognition of its Historic Park Status and last lawful use as a plant nursery, has been designated as a community growing space. The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for development coming forward on this site. Any application would be assessed on its statutory heritage designation and against the policies in the adopted Local Plan</p> <p><b>Newham needs a planned approach to its green, water, play and growing spaces</b> Newham's Green and Water Infrastructure Strategy (2024) has assessed the borough's green, water, play and community growing spaces. The Strategy has informed and evidenced the Local Plan policies, Neighbourhood Chapter and Site Allocation requirements in order to reduce the gaps in provision. The Strategy sets out 11 principles, which provide a template for how we should protect, manage and monitor Newham's green and water spaces. It also includes an Action Plan which identifies key actions we need to undertake to deliver better green and water infrastructure across the borough.</p>
--	---	--



<p>GWS2 Water spaces</p>	<p><b>General support</b> Residents, a community group, developers, the Canal and River Trust, the Port of London Authority, the Environment Agency, Natural England, the Woodland Trust and the London Legacy Development Corporation broadly supported the policy approach.</p> <p><b>Access to water space /Improvements to water space</b> Residents wanted to see an improved network of water spaces. Improvements to the River Roding, River Lea and dock edges. Residents and one community group wanted to see more water spaces in Newham’s parks, a desire for outdoor swimming and a strong call for improvements to the quality of the existing water environment. One community group wanted to see monitoring targets for improving water quality.</p> <p><b>Roding Back River</b> Residents and Thames 21 showed strong support for the delivery of the River Roding Trust’s plans to restore East Hams Back River.</p>	<p><b>General support</b> Support for the policy is welcomed.</p> <p><b>Access to water space / Improvements to water space</b> Policy GWS2 continues to support the delivery of a network of improved, high-quality water spaces. This Policy is supported by the Green and Water Infrastructure Strategy (2024), which has mapped existing water spaces and set out where future improvements can be made. A change to this monitoring framework has not been made as water quality of our rivers is monitored under Policy CE1.</p> <p><b>Roding Back River</b> This policy approach has changed to reflect the support for the Back River project. Both East Ham South and East Ham neighbourhoods now include a clause in their visions to support the restoration of the ancient course of the Back River. Site allocation N13.SA3 has also been amended to include a requirement for developers to explore the restoration of the Back River. Newham’s Green and Water Infrastructure Strategy (2024) also supports the Back River initiative.</p>
<p>GWS3 Biodiversity, urban greening, and access to nature</p>	<p><b>General support</b> Residents, a community group, developers, the Canal and River Trust, the Environment Agency, Natural England, the Woodland Trust, Port of London Authority, the Lee Valley Regional Park Authority and the London Legacy Development broadly supported the policy approach.</p>	<p><b>General support</b> Support for the policy is welcomed.</p>

	<p><b>Protection / better access to nature</b> Residents wanted to see more protection for existing biodiversity. Residents also wanted there to be more spaces in Newham where they can access nature and expressed strong support for rewilding projects. The Greenway was highlighted as an important asset. One community group wanted to see more floating gardens on the dock edge to encourage wildfowl.</p> <p><b>Living building features</b> Residents and community groups showed a strong desire for more urban greening, features such as green roof and measures to improve Newham's biodiversity. Developers broadly supported this element of the policy. The Environment Agency, the London Legacy Development Corporation and a number of residents supported living building features. Two residents supported the provision of green roofs.</p> <p><b>Urban Greening Factor</b> There was support from the GLA, and one community group for the proposal to take forward a bespoke Urban Greening Factor for Newham. Two developers wanted the policy to reflect the London Plan Urban Greening Factor and did not want to see a bespoke Newham approach. The London Legacy Development Corporation wanted to see more information on the Newham-specific approach. Two developers wanted the policy to include a caveat if the target Urban Greening Factor could not be met and highlighted the challenge of delivering urban greening on industrial sites.</p>	<p><b>Protection / better access to nature</b> The policies in the Green and Water Chapter of the Local Plan continue to highlight the importance of improving access to Newham's green and water spaces.</p> <p><b>Living building features</b> Policies in this chapter continue to support the delivery of living building features, including the provision of green space at roof level. Further wording has been added which now provides further guidance on different types urban greening features.</p> <p><b>Urban Greening Factor</b> This policy approach has now changed following the completion of the Green and Water Infrastructure Strategy (2024) which recommends that Newham uses the approach in London Plan Policy G5.</p>
--	---	---

	<p><b>Biodiversity Net Gain</b> There was broad support for the approach to biodiversity net gain, including support from the Environment Agency, residents and developers. One community group wanted Newham to set a more ambitious target. Natural England made a number of suggestions to ensure the policy reflected the Environment Act 2021 and its requirements. One resident wanted to see better monitoring of biodiversity net gain.</p> <p><b>Sites of Importance for Nature Conservation Value</b> Three developers, the London Legacy Development Corporation and Thames Water disputed the Site of Nature Conservation Value (SINC) designations on their sites.</p> <p><b>Ecologist expertise</b> Residents and one community group raised the need for in-house ecology expertise in the Council.</p>	<p><b>Biodiversity Net Gain</b> This policy approach has now changed to better reflect the Environment Act 2021 and the requirement for a minimum 10 per cent Biodiversity Net Gain.</p> <p><b>Sites of Importance for Nature Conservation Value</b> A change to the updated SINC's have not been made as an assessment of Newham's SINC's was undertaken between June-August 2022 to inform the Local Plan. This was endorsed by the September 2023 London Wildlife Sites Board.</p> <p><b>Ecologist expertise</b> The Green and Water Infrastructure Strategy (2024) has been completed since the Regulation 18 Local Plan consultation. This updated evidence base has improved our knowledge of the borough's green and water spaces. In addition, the Council is currently seeking to improve our in-house ecology expertise.</p>
GWS4 Trees and hedgerows	<p><b>General support</b> Residents, community groups, developers, the Woodland Trust and London Historic Parks and Gardens showed strong support for this policy.</p> <p><b>Tree planting / increased canopy cover</b> Residents expressed a strong desire for more trees in the boroughs green spaces and on its streets. They would like to see an increase in Newham's canopy cover.</p>	<p><b>General support</b> Support for the policy is welcomed.</p> <p><b>Tree planting / increased canopy cover</b> Policy GWS4 continues to deliver a network of improved tree stock and canopy cover with greater species and age diversity. This Policy is supported by the Green and Water Infrastructure Strategy (2024),</p>

	<p><b>Protection of trees</b> A few developers expressed concerns that the policy provided a blanket protection on all existing trees.</p> <p><b>Edible green space</b> One community group requested inclusion of food forests, fruiting species and nut trees in every park/ green space.</p>	<p>which has mapped the borough's existing trees and set out where future improvements in Newham can be made.</p> <p><b>Protection of trees</b> A change to this policy approach has not been made as whilst Policy GWS4 seeks to protect trees and hedgerows, it also includes a clause to allow for the loss of a tree or hedgerow where sufficient evidence is provided to justify this approach. This is considered to be proportionate and balanced approach.</p> <p><b>Edible green space</b> This wording change has been made.</p>
GWS5 Play and informal recreation for all ages	<p><b>General support</b> Residents showed strong support for this policy</p> <p><b>Lack of play and informal recreation facilities for children, young people and adults</b> Residents and one community group raised a strong desire for more outdoor facilities for children, young people and adults. There is a need for outdoor spaces which are safe, provide cover, access to nature and place to run and cycle. A need for outdoor spaces to offer additional facilities such as gym equipment, cafes, water fountains and toilets was also raised. Residents highlighted the poor quality of Newham's existing play spaces.</p> <p><b>Co-design play facilities</b> Residents want to be involved with the design of play space in Newham</p>	<p><b>General support</b> Support for the policy is welcomed.</p> <p><b>Lack of play and informal recreation facilities for children, young people and adults</b> Newham currently has a low level of play and informal recreation space. Following the completion of the Green and Water Infrastructure Strategy (2024) and the Built Leisure Needs Assessment (2024). The neighbourhood policies and site allocations now include, where appropriate, the need for development to deliver play and sport and recreation facilities.</p> <p><b>Co-design play facilities</b> We have not changed this policy as it already sets out that new play and informal recreation facilities should be designed to meet the needs of Newham's population, be inclusive, accessible and safe. It support the</p>

		co-production of play space with local adults, children and young people, parents, and carers.
<b>Climate Emergency</b>		
CE1 Environmental design and delivery	<p><b>Resident support</b> Residents supported the policy overall, noting their concern about the Climate Emergency and the lack of action to tackle it effectively.</p> <p><b>Contaminated land</b> Developers had concerns regarding de-contamination of land and the requirements and cost of doing so.</p> <p><b>Pollution</b> Concern from the Environment Agency that groundwater pollution was not addressed, and that the Contaminated Land Strategy (2003) was out of date.</p> <p><b>Water efficiency</b> The Environment Agency wished to highlight that Newham is in an area of serious water stress. Concern was raised by Thames Water regarding the need for water efficiency measures and how they could be implemented in policy (such as BREEAM).</p>	<p><b>Resident support</b> Support for the policy was welcomed. The Climate Emergency policies in the Local Plan, as well as wider work across the Council will allow us to be net zero for council operations by 2030 and net zero in Newham by 2045.</p> <p><b>Contaminated land</b> No change was made as developers must remediate land if necessary for development to occur.</p> <p><b>Pollution</b> Additional policy wording and supporting text has been added regarding groundwater pollution and source protection zones. The Contaminated Land Strategy has been updated.</p> <p><b>Water efficiency</b> No change was made as we maintain the 105 litres or less per head per day water use target for residential development, alongside other measures in policy. The supporting text makes clear that Newham is in an area of serious water stress.</p>
CE2 Zero Carbon development	<p><b>Justified and Deliverable</b> Some developers supported the overall aim of the policy. Some developers had concerns about the cost, deliverability and implementation of the policy – and trade-offs with other policy requirements such as affordable housing and infrastructure. Other developers had concerns regarding policy thresholds and when the</p>	<p><b>Justified and Deliverable</b> Support for the policy is welcomed. The policy approach has remained the same, as it is necessary for Newham to meet its climate emergency objectives and the Climate Change Evidence Base demonstrates that the policy is deliverable, viable and achievable. The evidence base included modelling of a variety of buildings to demonstrate this. As assessment of the cost of the energy policy is included in the viability</p>

	<p>policy would apply. Residents and community groups supported the policy, as well as offering suggestions on how the policy could go further in future, including stronger energy standards and suggestions of specific materials to be used in construction.</p> <p><b>Solar PV offset</b> Developers had concerns regarding the methodology behind the solar PV offset, requesting that it is set to an affordable level. They also had concerns regarding competing requirements for roof space for private amenity, biodiversity net gain, utilities and solar PV.</p> <p><b>Electric heating</b> The GLA had concerns regarding electric heating, noting the high cost of running these systems.</p> <p><b>Gas connections</b> One developer considered the prohibition of gas connections to be onerous.</p> <p><b>Decarbonisation of heat networks</b></p>	<p>assessment and demonstrate they are deliverable, in line with the NPPF.</p> <p>The policy thresholds have been clarified, while maintaining the overall approach that as little energy as possible should be used to run/heat a building.</p> <p>Support from residents and community groups was welcomed; however, some suggestion by residents (such as using specific building materials) were suggestions that the Local Plan cannot implement. We have passed on suggestions that other teams in the Council can action for consideration.</p> <p><b>Solar PV offset</b> The policy has not changed, as the Climate Change Evidence Base demonstrates how the solar PV offset figure was calculated, and the methodology behind it. The Climate Change Evidence Base also considers the trade offs at roof level, demonstrating that targets can be met while allowing some space for other purposes. The supporting text clarifies that roof space should be prioritised for solar PV and that biodiversity improvements and amenity space should be delivered at ground or podium level.</p> <p><b>Electric heating</b> The policy continues to allow electric heating as an option, with the evidence base noting that they may become more viable over time as energy demand from homes falls.</p> <p><b>Gas connections</b> We did not change the policy, as it is necessary to meet our climate objectives. Alternatives to fossil fuelled powered heating are viable and affordable and are in wide use across the UK.</p> <p><b>Decarbonisation of heat networks</b></p>
--	---	--

	<p>Developers, the LLDC and the GLA had concerns regarding the policy requirement for decarbonisation of heat networks, and how this would be achieved in the short run as well as the implications for LLDC requirements and assumptions that developments in close proximity to their heat network, would connect to it in the future.</p> <p><b>Data centres</b> Some developers had concerns regarding how the policy would affect data centres, noting their abnormal energy use requirements. They also noted that a data centre could provide waste heat.</p>	<p>The policy maintains the objective to move away from heat networks that use fossil fuels. The policy has clarified when connections to district heat networks will be allowed and allows further flexibility. The heat network will not have to be decarbonised at the point of application but a fully funded decarbonisation plan which will be implemented within the lifetime of the Local Plan – must be in place at the point of application.</p> <p><b>Data centres</b> The policy maintains the overall approach that as little as energy as possible should be used to run/heat a building. The policy approach regarding waste heat as a source of low carbon heat has been clarified. The policy is clear that the use of waste heat is supported and encouraged but that waste heat would not be considered to be a specific benefit of a scheme unless it pays for the development of heat network infrastructure that would allow waste heat to be delivered.</p>
CE3 Embodied carbon	<p><b>Justified and Deliverable</b> Some developers supported the policy, but did note the challenge of meeting the requirements. Other developers considered that the policy was too onerous, and should only apply to schemes referable to the Mayor of London. Some developers considered that there was a lack of evidence to support the policy approach. One developer stated that the policy standards exceed building regulations, and the Written Ministerial Statement of 2015 means that we cannot set our own targets and so the policy should follow building regulations.</p> <p><b>Data centres</b> One developer requested that the policy exclude data centres in light of their high embodied carbon.</p>	<p><b>Justified and Deliverable</b> The policy approach has been maintained, as newly published evidence base from the West of England Combined Authority and City of Westminster indicate that embodied carbon targets can be reached with little viability impact. We maintain the policy approach of applying it to all major development, considering it necessary in light of our climate objectives. This Written Ministerial Statement was superseded in December 2023, and we do not consider that this changes the ability for councils to set their own standards.</p> <p><b>Data centres</b> The policy approach to minimise the amount of embodied carbon has been maintained.</p>

	<p><b>Policy doesn't go far enough</b> Some community groups and residents considered that the policy didn't go far enough – targets should be lower and the circular economy should be considered in the policy.</p>	<p><b>Policy doesn't go far enough</b> The circular economy principles have been added to the policy. The overall policy approach has been maintained, as we do not have evidence that lower embodied carbon targets would be achievable or justified.</p>
CE4 Overheating	<p><b>General Support</b> Residents and community groups supported the policy, noting their concerns regarding overheating and offering various suggestions on how overheating can be minimised.</p> <p><b>Building Regulations</b> Some developers considered that overheating is covered in Building Regulations and should not therefore be included in the Local Plan.</p> <p><b>Active cooling</b> The Port of London Authority and some developers noted that prohibiting active cooling may be the only way to prevent overheating if other policy objectives take precedence.</p> <p><b>Data centres</b> One developer requested that the policy exclude data centres, given the large amount of mechanical cooling used.</p>	<p><b>General Support</b> Support is welcomed, and the supporting text includes a variety of passive design considerations that help to minimise overheating.</p> <p><b>Building Regulations</b> The policy remains in the Plan and the justification text has been expanded to show why considering overheating at the earliest stage of design is important. This is because, passive design principles (building orientation, unit layout etc.) can only be considered at the earliest stage of design, and during the planning process, rather than later during the design process, when building regulation sign off occurs. Delaying these considerations risks limiting the cooling principles which could be considered making it more likely that active cooling methods are required.</p> <p><b>Active cooling</b> The policy approach has been modified, clarifying that significant noise, pollution or agent of change issue may mean that that active cooling is appropriate. Policy H11 Housing Design quality also requires the provision of alternative aspects (windows or doors) where poor external conditions including noise and visual amenity exist.</p> <p><b>Data centres</b> The policy approach has been maintained, with buildings required to be designed to minimise the need for active cooling as much as possible.</p>



		This is considered to be flexible enough to consider exceptional uses such as data centres.
CE5 Retrofit and the circular economy	Some residents considered that the policy should further encourage retrofit for householders, as well as supporting residents who do so. Other residents and community groups made suggestions on how retrofit can be implemented in the borough, such as increasing the amount of solar panels, removing gas boilers and lowering the cost of a planning application	The justification text has been expanded with background on retrofit, and why comprehensive retrofit should be considered. No further changes have been made as many retrofit actions can take place without needing planning permission and the policy is already supportive of retrofit work. Some suggestions from residents are included in the policy, however some suggestions by residents cannot be implemented by the Local Plan. We have passed on suggestions that other teams in the Council can action for consideration.
CE6 Air quality	<p><b>General Support</b> Some developers and the Environment Agency supported the policy, noting Newham's poor air quality and efforts to improve this.</p> <p><b>More action needed</b> Residents and community groups noted their concern regarding air quality in the borough. Many residents offered suggestions on how air quality could be improved in the borough, such as tree planting, reducing private car use and mandating a specific planting density.</p>	<p><b>General Support</b> Support for the Local Plan approach is welcomed.</p> <p><b>More action needed</b> Many suggestions by residents were things that the Local Plan cannot implement, noting that many actions to address poor air quality are being taken across the Council (such as the Climate Action and Highways team) and by Transport for London. We have passed on suggestions that other teams in the Council can action for consideration.</p>
CE7 Managing flood risk	<p><b>Alignment with water studies</b> The Environment Agency, Port of London Authority and GLA were supportive of, and suggested greater referencing of, water studies which LB Newham is working on in partnership. The Royal Docks Team suggested removing the Riverside Strategy reference.</p>	<p><b>Alignment with water studies</b> A small change to the implementation text has been made to explain how developments within the Royal Docks and Beckton area should deliver the relevant site-specific recommendations of the local Integrated Water Management Strategy. However references to the Riverside Strategy have been removed due to uncertainty around resourcing this study.</p>

	<p><b>Small technical amendments</b> The Environment Agency were strongly supportive of the policy but requested that some small technical amendments be made to the policy regarding setbacks, safe havens and lifetime of a development definition.</p> <p><b>Policy Flexibility</b> Developers requested further policy flexibility regarding policy requirements on setback.</p> <p><b>Further details on flood defences</b> The Environment Agency and Royal Docks Team requested that further detail be provided on flood defences in the borough and how developments should maintain them.</p>	<p><b>Small technical amendments</b> The wording recommendations have been made to ensure policies are suitably robust, in line with best practice and clear.</p> <p><b>Policy Flexibility</b> This change was not made as flexibility is already provided through the implementation text, which states that the buffering line is indicative only and that applicants should discuss requirements further with the Environment Agency. The current and draft policies are in keeping with national and regional policy.</p> <p><b>Further details on flood defences</b> The wording in the implementation text has been changed to include these flood defences requirements. It was not considered necessary to add further wording on the requirements for developers as this was already adequately addressed.</p>
CE8 Sustainable drainage	<p><b>Groundwater protection</b> The Environment Agency supported this policy but requested further detail be added regarding the need to consider land contamination when discharging surface water.</p> <p><b>Policy Flexibility</b> Developers requested further policy flexibility regarding standards for greenfield run off rates in the policy.</p> <p><b>Guidance on greening and permeable surfaces</b></p>	<p><b>Groundwater protection</b> This wording change was been made to provide further guidance on this issue.</p> <p><b>Policy Flexibility</b> This change was not made as it was considered there was sufficient evidence, in the Local and Strategic Integrated Water Management Strategies, to demonstrate the necessity and deliverability of the standards. In addition the policy provides greater flexibility in the limited circumstances where they cannot be achieved.</p> <p><b>Guidance on greening and permeable surfaces</b></p>

	<p>Climate You Change suggested greater emphasis and guidance on greening and permeable surfaces be included.</p>	<p>Changes regarding greening were not made as this is sufficiently addressed in the Sustainable Drainage Hierarchy which development is required. Further greening requirements for new development are also already included in the Green and Water Space policies. Some changes to reference need for permeable surfaces have been made, which also reflect the recommendations of the Strategic Integrated Water Management Strategy for the Royal Docks and Beckton Opportunity Area. This highlighted the need for, and opportunity to, establish targets for Blue-green infrastructure run-off reduction interventions on site allocations in that part of the borough.</p>
<b>Transport</b>		
<p>T1 Strategic Transport</p>	<p><b>General Support</b> Developers, Transport for London (TfL) and London City Airport welcomed the policy. Residents and community groups supported the policy, with many general suggestions on how transport in the borough could be improved, including improved cycle routes, better bus services and discouraging driving.</p> <p><b>Rail heads</b> One developer requested that the Bow East Goods Yard be safeguarded as a strategic rail head, in light of its use for the transport of aggregates to supply the construction industry in London.</p> <p><b>Bridges and piers</b> Port of London Authority requested that bridges and piers be considered as strategic transport infrastructure, to offer them greater protection and consideration from nearby development.</p>	<p><b>General Support</b> Support for the policy is welcomed. The Sustainable Transport Strategy outlines how improvements to walking, cycling and public transport will be delivered, working with TfL. Projects and initiatives suggested were fed into the development of the strategy, which assisted policy development. We have also passed on suggestions that other teams in the Council can action for consideration.</p> <p><b>Rail heads</b> Policy wording has been amended to include the safeguarding of rail heads.</p> <p><b>Bridges and piers</b> Policy wording has been updated to include these as strategic transport infrastructure.</p>
T2	<b>General Support</b>	<b>General Support</b>

Local Transport	<p>Residents, community groups and developers expressed their support for the policy, making suggestions how walking, cycling and public transport in the borough could be improved. Specific routes mentioned included the Greenway, River Roding Way, Leaway, Thames Path and major roads in the borough. Residents, community groups, developers and TfL supported the future Sustainable Transport Strategy, and expressed desire to input into this work.</p> <p><b>Low Traffic Neighbourhoods</b> Some residents expressed concern regarding Low Traffic Neighbourhoods and the policy approach regarding these – with concern regarding traffic displacement, consultation, equity and a perceived inability to access certain parts of the borough.</p> <p><b>Freight by river</b> Port of London Authority requested that the policy be expanded to promote the use of the river for freight.</p>	<p>Support for the policy is welcomed. The supporting text has been expanded to note support of improvements to public transport. The Sustainable Transport Strategy was consulted on in March 2024. The Sustainable Transport Strategy outlines how improvements to walking, cycling and public transport will be delivered, working with TfL. Projects and initiatives suggested were fed into the development of the strategy, which assisted policy development. We have passed on suggestions that other teams in the Council can action for consideration.</p> <p><b>Low Traffic Neighbourhoods</b> The policy approach has been maintained. The Local Plan encourages new developments to support the rollout of LTNs, including the delivery of key walking and cycling connections within the site and to and from key local facilities, as well as the layout of the site.</p> <p>With regards to resident concerns regarding LTNs, consideration of an LTN involves extensive data collection and consideration of feedback from local residents and businesses. Traffic management may mean that residents have to take a slightly different route to get from the main road to their property. All properties remain accessible by car. Pedestrians, cyclists and wheelchair users can go through modal filters unrestricted.</p> <p>The rollout of LTNs in Newham has led to a significant decrease in traffic volumes, a significant increase in cycling trips, and improvements in air quality.</p> <p><b>Freight by river</b> The supporting text has been amended to support this.</p>
-----------------	--	--

	<p><b>Developer contributions</b> Some developers had concerns regarding the cost of developer contributions for cycle hire and wayfinding, as well as querying if it would benefit their own development sites.</p> <p><b>Publicly accessible cycle hire and car clubs</b> Metropolitan Police requested that car club parking spaces not be located within private parking for security reasons.</p>	<p><b>Developer contributions</b> The policy approach, to require contributions, has been maintained, as there may be cases where monies are pooled for improvements in a local area, rather than delivered on the development site.</p> <p><b>Publicly accessible cycle hire and car clubs</b> Wording has been changed to clarify that cycle hire and car clubs should be publicly accessible.</p>
T3 Transport Behaviour Change	<p><b>General Support</b> Residents generally supported the policy, with many making suggestions on how walking, cycling and public transport in the borough could be improved, including new cycle lanes, improved bus services and better public realm.</p> <p><b>Car free development</b> Some developers supported the approach of car free development, while other developers objected to the approach, considering the policy to be restrictive and unrealistic. Some developers argued that the policy wording for industrial sites is not consistent with the car free development approach.</p> <p><b>Mobility scooters</b> TfL noted that parking for mobility scooters would only be considered as an exception to blue badge parking requirements where it could be justified.</p>	<p><b>General Support</b> Support for the policy is welcomed. The Sustainable Transport Strategy was consulted on in March 2024. Projects and initiatives suggested were fed into the development of the strategy, which assisted policy development. The Sustainable Transport Strategy outlines how improvements to walking, cycling and public transport will be delivered, working with TfL. We have passed on suggestions that other teams in the Council can action for consideration.</p> <p><b>Car free development</b> The policy approach has been amended to make clear that that all new development will be car free, apart from limited provision for certain uses/use cases (such as industrial development with shift work and poor public transport accessibility), which must be within the maximum standards of the London Plan. We have maintained the overall policy approach in light of London Plan parking standards for inner London boroughs, Opportunity Area modal shift targets and a general policy direction to discourage private car use to support a Just Transition.</p> <p><b>Mobility scooters</b> The supporting text has been amended to make clear when it would be acceptable to reduce the quantity of blue badge parking by providing</p>

	<p><b>Electric Vehicle Charging Points</b> Some developers did not support the policy requirement to provide contributions for Electric Vehicle Charging Points when development is car free.</p> <p><b>Charging of E-bikes</b> TfL and the London Fire Brigade requested that charging of batteries for e-scooters and e-bikes take place in the home, not in cycle storage, due to fire risk.</p> <p><b>Excess road space</b> Some residents expressed a desire to reduce excess road space (such as wide junctions), including expanding the amount of pedestrianised / car free areas.</p> <p><b>Low Traffic Neighbourhoods</b> Some residents expressed concern regarding Low Traffic Neighbourhoods and the policy approach regarding these – with concerns regarding consultation and perceived inability to access certain parts of the borough.</p>	<p>mobility scooter parking. This is only when the development is located in an accessible and well connected location.</p> <p><b>Electric Vehicle Charging Points</b> No change has been made to this policy approach. Supporting text has been expanded to make clear why the policy maintains restrictions on new car usage, while supporting the rollout of electric vehicles for residents and businesses who need them. Developments need to receive deliveries and be serviced and residents will receive visitors who use cars – in order for the plan to deliver our sustainability objectives these must be electric, which require a network of changing facilities.</p> <p><b>Charging of E-bikes</b> The policy approach has been amended to make clear how charging of E-bikes and mobility scooters can be charged safely.</p> <p><b>Excess road space</b> A new policy clause has been added, supporting applications which would result in the loss of existing car parking/excess road space, helping to encourage more sustainable modes of transport, in line with our transport objectives. In addition, the policy also outlines that drive-throughs would not be supported, in light of their impacts including idling vehicles, littering and health impacts from takeaway food.</p> <p><b>Low Traffic Neighbourhoods</b> As outlined under policy T2, the policy approach remains the same. With regards to residents concerns regarding LTNs, consideration of an LTN involves extensive data collection and consideration of feedback from local residents and businesses. Traffic management may mean that residents have to take a slightly different route to get from the</p>
--	--	--

		<p>main road to their property. All properties remain accessible by car. Pedestrians, cyclists and wheelchair users can go through modal filters unrestricted.</p> <p>The rollout of LTNs in Newham has led to a significant decrease in traffic volumes, a significant increase in cycling trips, and improvements in air quality.</p>
<p>T4 Servicing a development</p>	<p><b>Last mile deliveries</b> Developers objected to the policy approach as they considered it would not be achievable within their business requirements and the lack of a comprehensive zero-emission fleet. Some developers requested policy flexibility, for the same reason.</p> <p><b>Freight by river</b> Port of London Authority requested that the policy be expanded to promote the use of the river for servicing and deliveries.</p>	<p><b>Last mile deliveries</b> The policy approach has been maintained, following the evidence from the Sustainable Transport Strategy, which outlines how servicing by sustainable means can be delivered through the use of zero-emission vehicles or e-cargo bikes, increased numbers of parcel lockers as well as freight consolidation between businesses.</p> <p><b>Freight by river</b> The supporting text has been amended to support this.</p>
<p>T5 Airport</p>	<p><b>Policy Objectives</b> Residents supported the policy approach to seek to manage expansion and change at the airport, as it addressed their concerns regarding expansion of the airport, night flights, and loss of the respite period. London City Airport considered that the policy takes the wrong approach and should be revised. London City Airport considers that the airport's Master Plan demonstrates how it can grow while housing is built in the area around the airport.</p> <p><b>National policy and masterplan</b> London City Airport stated that national policy and the airport's Masterplan were not considered or taken into</p>	<p><b>Policy Objectives</b> The general policy approach has been maintained. The Council has to balance various objectives in the development of the policy - and it is considered that some objectives (such as the need for housing) outweigh the case for supporting changes to the airport activity.</p> <p><b>National policy and masterplan</b> The airport's Masterplan does not have a statutory basis, but provides a statement of intent to be given due consideration in the planning</p>

<p>consideration and that the policy should be drafted taking both into account.</p> <p><b>Mitigation of Impacts</b> London City Airport consider the policy takes a negative position on airport related development proposals without considering how impacts can be mitigated.</p> <p><b>Consolidation of the airport and land uses</b> London City Airport supported consolidation of ancillary airport infrastructure to free up land for employment generating uses. London City Airport considered that the policy wording could be more flexible than only supporting industrial uses, in order to allow for more aspirational land uses.</p> <p><b>Freight</b> London City Airport expressed concerns regarding freight flights not being supported in policy, noting that air freight could be of benefit to Newham and east London.</p> <p><b>Improved connections and car parking</b> Residents expressed a desire for improved connections to the airport from the north of the borough and Barking. TfL</p>	<p>process. The policy approach has not changed as both the airport's Masterplan and national aviation policy were given due consideration in the development of this policy.</p> <p><b>Mitigation of Impacts</b> The policy approach has been clarified to state that development would be acceptable only if it did not cause unacceptable negative impacts to existing local residents and new homes and their future residents, following mitigation. Furthermore, the policy approach has been amended to make clear that it is noise, vibration, smell and air quality impacts which should be mitigated - and where negative impacts would be unacceptable even following mitigation, development would not be supported. The policy states that it is considered that reducing the extant respite period or the introduction of night flights would result in an un-mitigatable and unacceptable impacts to existing local residents and to development proposals for new homes.</p> <p><b>Consolidation of the airport and land uses</b> This policy approach has changed to remove specific examples of uses that support or complement the airport and therefore provides more flexibility.</p> <p><b>Freight</b> The policy wording has been amended to make clear that dedicated freight planes would not be supported, however using any spare capacity on existing passenger flights for freight would be acceptable.</p> <p><b>Improved connections and car parking</b> The policy approach has been maintained, as a future development proposal could reduce the amount of car parking on site and in line with</p>
---	---



	<p>supported the policy approach to reduce car parking. London City Airport stated that policy cannot require a reduction in the level of car parking on site and requested that this policy requirement be removed. London City Airport also expressed desire for the policy to further support an Elizabeth line station to serve the airport.</p> <p><b>Net Zero</b> London City Airport suggested that the policy should be more flexible - allowing “low ... carbon technologies” where it “does not adversely impact local residents”</p>	<p>the Plan and London Plan’s approach to car parking, we would seek to support and secure this. The Sustainable Transport Strategy supports efforts by London City Airport, TfL and the Council to improve sustainable access to the airport. Discussions with both TfL and consultants working on the Sustainable Transport Strategy, concluded that an Elizabeth line station is not necessary to support the levels of growth in the Royal Docks.</p> <p><b>Net Zero</b> Policy approach was maintained in light of the Council's commitments to achieve net zero by 2045, and London City Airport being a net zero carbon business by 2050. The Council supports future zero carbon technology, and does not wish to "bake in" unsustainable technology in the interim.</p>
<b>Waste and Utilities</b>		
W1 Waste management capacity	<p><b>East London Joint Waste Plan</b> The Greater London Authority welcomed the progress on the East London Joint Waste Plan. They questioned whether the currently adopted safeguarded site for a potential future waste site at Beckton Riverside should be released. Some developers questioned the identification of waste sites on land they were redeveloping.</p> <p><b>Circular economy and improving standards</b> Residents, the Greater London Authority and the Environment Agency broadly supported the policy, and commitments to deliver a more circular economy. Broader</p>	<p><b>East London Joint Waste Plan</b> Support for the progress on the Joint Waste Plan is welcomed. The Evidence Base for the East London Joint Waste Plan shows there is sufficient capacity for east London to manage waste arisings in its area without the need for the provision of new waste sites, and therefore we have decided not to take forward the safeguarded potential waste site at Beckton Riverside in the Joint Waste Plan. We will be formally pursuing the release of this site, along with confirmation of safeguarded waste sites, through the update of the Joint Waste Plan, the preparation of which is currently being undertaken in parallel with the update of the London Borough of Newham's draft Local Plan.</p> <p><b>Circular economy and improving standards</b> While the Local Plan addresses this topic through waste policies, some of the comments provided will be best addressed by our Waste team in the Council. Currently, our colleagues in the Waste department are looking at scope for improved recycling as part of the development of</p>

	concerns about rubbish, fly tipping and recycling collections were raised by residents.	Newham's Public Realm Waste and Cleansing Strategy. We have also provided them with relevant comments.
W2 New or improved waste management facilities	Residents broadly supported the policy, and similar to the responses to Policy W1, requested improvement to waste disposal and collection in the borough. The Environment Agency supported the design considerations for new waste management facilities.	While the Local Plan addresses this topic through waste policies, some of the comments provided will be best addressed by our Waste team in the Council. Currently, our colleagues in the Waste department are looking at scope for improved recycling as part of the development of Newham's Public Realm Waste and Cleansing Strategy. We have also provided them with relevant comments.
W3 Waste management in developments	<p><b>General support</b> Residents and charities broadly supported the policy, particularly the requirements for separated recycling and food waste storage spaces in homes and reuse and tool sharing rooms in major-scale residential developments on site allocations. Developers raised logistical concerns around whether there was sufficient space on site to provide dedicated reuse rooms. Similar to the responses to Policies W1 and W2, residents and charities requested improvement to waste disposal and collection in the borough.</p> <p><b>Recycling targets</b> The Greater London Authority questioned whether Newham should seek to set more ambitious recycling targets.</p>	<p><b>General support</b> The broad support for the policy requirements is noted. We have not made a change to the policy approach to provide reuse rooms, recognising the policy applies to site allocations, which are the largest sites available in the borough. While the Local Plan addresses some concerns raised by residents through waste policies, some of the comments provided will be best addressed by our Waste team in the Council. Currently, our colleagues in the Waste department are looking at scope for improved recycling as part of the development of Newham's Public Realm Waste and Cleansing Strategy. We have also provided them with relevant comments.</p> <p><b>Recycling targets</b> The policy approach has not changed. It is well-understood that not all London boroughs will be able to meet the GLA's targets to meet a municipal waste recycling target of 65 per cent by 2030, particularly given the high density of flats delivered and planned in the borough.</p>
W4 Utilities and Digital Infrastructure	<p><b>General Support</b> This policy is supported by residents, Thames Water, the Environmental Agency.</p> <p><b>Heat network</b></p>	<p><b>General Support</b> Support for the policy is welcomed.</p> <p><b>Heat Network</b></p>

	<p>One developer, the LLDC and one resident requested changes to the heat network policy including expressly considering waste heat as a decarbonised energy source, allowing connection to heat networks with a decarbonisation plan and addressing this topic in the climate emergency policy.</p> <p><b>Engagement with utilities providers</b> The Environmental Agency and Thames Water were supportive to the requirement for applicants to carry out pre-application engagement with utility providers while one developer objected to this requirement with the ground that this should be resolved between the council and utilities providers.</p> <p><b>Impact on infrastructure capacity and assets</b> Thames Water, National Grid and the Environmental Agency requested further consideration of infrastructure capacity and assets including on/ off-site capacity, cumulative impact, infrastructure delivery ahead of occupancy, sewage pipe misconnections and implication of development proposals on existing assets.</p> <p><b>Digital growth</b> Developers and residents support the recognition of digital growth in this policy but requested elaboration on details of implementation including support for data and digital economy and Wi-Fi provision.</p>	<p>Wording changes have been made to clarify waste heat is considered to be a carbonised heat source subject to meeting requirements and any developments that ensures continued use of fossil fuels by a heat network beyond the lifetime of the plan will not be supported.</p> <p><b>Engagement with utilities providers</b> This approach has not been changed as the council already engages with utilities providers and the GLA to address utilities infrastructure requirements in the borough and region. All major developments are expected to engage utility providers to ensure utilities networks and connections can serve the development ahead of occupation.</p> <p><b>Impact on infrastructure capacity and assets</b> Wording changes have been made to provide further detail and clarity on utilities capacity and assets.</p> <p><b>Digital growth</b> These changes were not made as data and digital economic growth is already covered in the Inclusive Economy policy and relevant Neighbourhood policies while Wi-Fi provision is covered in Local Plan Policies HS2, CF2, GWS1 and GWS5. However, the policy has changed to aid clarity that policy W4 is now focusing on digital connectivity infrastructure.</p>
--	--	---

	<p><b>Security consideration of digital infrastructure</b> Metropolitan Police requested applicant to undertake pre-application engagement with Counter Terrorism Security Advisors.</p> <p><b>Topics outside this policy</b> Environmental Agency requested expanding the scope of this policy to cover surface water drainage and flood risk. Residents commented on other topics such as water bill and waste management in sewers.</p>	<p><b>Security for digital infrastructure</b> This requirement has been added into the policy.</p> <p><b>Topics outside this policy</b> No changes have been made as surface water drainage and flood risk are covered in Local Plan Policies CE7 and CE8 while the Local Plan cannot deliver water metering and sewage capacity.</p>
<b>Neighbourhoods</b>		
	<p>Some residents and attendees of the Local Plan assemblies objected to the neighbourhood boundaries. This included the West Ham and Forest Gate boundary, the Canning Town and Custom House and Beckton boundaries, the East Ham boundary, the Royal Albert North boundary and the Royal Victoria and North Woolwich boundary. Some landowners and developers objected to some of the neighbourhood boundaries, including Stratford and Maryland and West Ham boundary, Canning Town and Custom House and Manor Road boundary and Gallions Reach and Royal Albert North boundary. Some councillors and community group representatives argued that residents did not recognise the neighbourhoods due to the lack of engagement and that they were too large to be considered a 15-minute neighbourhood.</p>	<p>The Local Plan neighbourhoods were identified through the Newham Characterisation Study (2022) and informed by public engagement which took place in autumn 2021 and winter 2022, as well as feedback from the Reg 18 consultation. The boundaries of the neighbourhoods were identified through an analysis of the different ways the borough can be sub-divided. This included factors like administrative boundaries such as ward boundaries, planning designations such as town centre boundaries or conservation areas, and their character, such as the look and feel of an area and their function, such as the type of uses in an area. The boundaries were shaped by public engagement and feedback from residents, businesses and local organisations on what they perceive to be their neighbourhood, what is important to them and what they like and don't like. The main purpose of the neighbourhood policies is to provide detailed spatial guidance for a defined area of the borough and as a result will vary in size depending on the variety of character in different parts of the borough. They are not intended to be standalone 15 minute neighbourhoods. The Local Plan's spatial strategy seeks to deliver a network of 15-minute neighbourhoods. The ultimate goal of 15 minute neighbourhoods is to ensure that all residents can live within a 15-minute walk of key facilities such as shops, schools, parks and workspaces. This is so that residents do not have to travel so far to reach these essential services. The spatial strategy is not intended</p>

		<p>to create isolated and self-sustaining areas but to support access to services and facilities for everybody, through a network of connected neighbourhoods, which give residents a choice in where they access different facilities and services, whether that is within their own neighbourhood or within the wider network. To better reflect the intentions behind this objective, this principle is now referred to as a network of well-connected neighbourhoods, in the Local Plan. In response to the comments from stakeholders a number of neighbourhood boundary changes have been made:</p> <ul style="list-style-type: none"> <li>• Canning Town and Custom House are now two neighbourhoods and the boundary between Canning Town has changed so that the Canning Town Riverside neighbourhood sits entirely within Canning Town.</li> <li>• The West Ham boundary has changed so that West Ham Park sits entirely within the West Ham neighbourhood.</li> <li>• Stratford and Maryland boundary has changed so that UEL sits entirely within the Stratford neighbourhood.</li> <li>• Gallions Reach boundary has changed so that the whole of the local centre sits within the neighbourhood</li> </ul>
	Some residents and attendees of the Local Plan assemblies queried what some elements of the policies meant, particularly policy requirements such as impact tests, and how they would be delivered. Others wanted the policies to be written in plain English.	The neighbourhood policies have been written in plain English as far as possible whilst also reflecting the technical language required in some circumstances. The neighbourhood policies should be read alongside the themed policies in the Local Plan which provide further guidance on how policies and their requirements, such as impact tests, should be implemented. The Local Plan also contains a glossary.
	Sport England commented on the limited mention of sports facilities and that the sports facility requirements for each neighbourhood should be updated once the sports-related evidence base documents are finalised.	The approach to sports facilities has been updated due to the finalisation of the Built Leisure Needs Assessment and Playing Pitch Strategy. New requirements are reflected in the neighbourhood policies and site allocations.
	TfL identified required improvements to public transport and requested developer contributions to fund the	The policy clauses relating to public transport, walking and cycling have been consolidated and updated to reflect the evidence in the Sustainable Transport Strategy. The neighbourhood policies do not

	improvements, particularly for step-free access. They also requested that bus stands be protected.	provide detail on how transport improvements should be funded as this will be considered in line with BNF4. Strategic infrastructure such as bus stands continues to be protected under Local Plan T1.
	Residents and attendees of the Local Plan assemblies requested that the number of betting shops and fast food shops be reduced. They want to see improvements to their high streets and requested particular types of businesses and shops, including banks, post offices and healthy food options. They also want to see a variety of options in their town centres as well as cultural and community facilities and improved public realm.	The approach to betting shops and fast food shops in the neighbourhood policies has changed to rely on the borough-wide approach set out in the high streets policies that manage the concentration of these uses. The high street policy clauses have been amended to clarify the mix of uses supported in the town centres and local centres, including community facilities as well as reflecting new town centre designations identified to ensure a 15 minute network of town centres across the borough. The request for some types of businesses and services cannot be delivered by the Local Plan as the Local Plan can only specify the uses supported when a planning application is received, rather than requiring specific businesses to locate in a neighbourhood.
	Residents and attendees of the Local Plan assemblies requested that the safety of neighbourhoods, particularly Canning Town and Custom House, is improved. Particular concerns were raised about Romford Road in terms of dangerous driving and parking. They also requested that cleanliness is improved across all neighbourhoods, particularly in relation to littering. Some residents wanted to see local waste and recycling facilities.	The neighbourhood policy design principles already address safety and work alongside other Local Plan policies which address safety, including the design and transport policies. Waste is addressed through the Local Plan waste policies. However, it cannot address topics such as bin collections, recycling collections and fly tipping. This is the responsibility of the waste department. The Local Plan address parking through its parking requirements in the transport policies. The Council is committed to reducing road danger and the number of people killed or seriously injured on our streets. We also want people to feel more comfortable walking and cycling on Newham's streets. Newham Council is planning to introduce a 20mph speed limit on most streets across the borough. Lower speed limits can help to reduce the number of traffic collisions, reduce the likelihood of serious injuries in collisions, especially for pedestrians, reduce noise and pollution from motor traffic, and encourage people to walk and cycle more. Physical measures or traffic calming measures such as road humps or speed cushions will be considered for streets or areas where speeding is occurring frequently. Parking is not allowed on footways or footpaths,

		pavements or grass verges – unless specifically exempted. Our parking enforcement officers can issue a Penalty Charge Notice (PCN) to vehicles parked in contravention or parked dangerously.
	Residents, community group representatives and attendees of the Local Plan assemblies want to see more community facilities. They also requested particular types of services including support for residents' mental health, adult education classes and exercise classes. Residents and attendees of the Local Plan Assemblies want to see more secondary schools, particularly in the south of the borough.	A new policy clause has been added to support community facilities that are in accordance with Local Plan SI1 where the Community Facility Needs Assessment has identified the neighbourhood as being below the borough average for community facilities. The request for some types of services within community facilities cannot be delivered by the Local Plan as the Local Plan can only protect existing community facilities and support new facilities in certain locations, rather than specifying the type of activities that should take place in venues. The requirements for new schools, which are reflected in the site allocations, is consistent with the Council's Pupil Place Planning work, which identifies the need for new schools in different parts of the borough.
	Residents, community group representatives and attendees of the Local Plan assemblies want more open space, particularly parks and requested improvements to particular locations across the borough.	The neighbourhood policies have been updated to reflect the finalised Green and Water Study, the Built Leisure Needs Assessment and the Playing Pitch Strategy which set out improvements to open space, green infrastructure and sports facilities in the relevant neighbourhoods.
	Some residents and attendees of the Local Plan assemblies objected to the support for Low Traffic Neighbourhoods. Some wanted to know the implication of Low Traffic Neighbourhoods and the designation of neighbourhoods on their ability to travel around the borough. Residents and attendees of the Local Plan assemblies identified specific locations where they want to see improvements to walking, cycling and public transport as well as to the public realm.	The approach to Low Traffic Neighbourhoods has not changed. Newham currently has five permanent Low Traffic Neighbourhoods (LTNs), as well as potential LTN in Woodgrange and Capel, and exploration of options to create more people-friendly streets in the West Ham Park area. A Low Traffic Neighbourhood is predominantly residential area that is bounded by main roads, in which a set of modal filters has been installed to prevent motor vehicles from using the residential area as a shortcut. Excess motor vehicle traffic in residential areas causes noise, road danger and pollution; and creates a poor environment for walking and cycling. LTNs aim to improve street environments and local neighbourhoods for walking and cycling by reducing traffic volumes, improving the quality of life for local residents, and making it easier for residents to choose walking or cycling for local journeys. LTNs are enforced by automatic number plate recognition

		<p>(ANPR) camera and non-exempt motor vehicles driving through them will receive a Fixed Penalty Notice (FPN). These operate 24 hours per day, 7 days per week. All addresses can be reached in and amongst LTNs without receiving an FPN, although routes may differ to avoid modal filters. Pedestrians, cyclists and wheelchair users can go through modal filters unrestricted. The ultimate goal of 15 minute neighbourhoods is to ensure that all residents can live within a 15 minute walk of key facilities such as shops, schools, parks and workspaces. This is so that residents do not have to travel so far to reach these essential services. Residents are of course welcome to travel further afield to reach a wider range of facilities. At the moment some parts of our borough are very isolated and do not have easy access to shops and facilities. The Plan aims to change this, through introducing new locations for shops, community facilities and parks and by creating new routes to increase access to existing facilities. There is no plan, intention or objective to limit residents to accessing one part of the borough or one set of facilities. To better reflect the intentions behind this objective, this principle is now referred to as a network of well-connected neighbourhoods, in the Local Plan.</p>
	<p>Residents and attendees of the Local Plan assemblies want to see the character of their neighbourhoods and historic buildings to be protected, particularly in Forest Gate and Manor Park. Some residents want to see more support for extensions to create larger family homes. Others objected to the increase in flats in some neighbourhoods, particularly in East Ham.</p>	<p>The conserve and enhance principles have been updated to add clarity to how the character of each neighbourhood will be conserved and enhanced. The neighbourhood policies do not address family sized housing as this is addressed in the design and housing policies, which are considered effective at addressing the design quality for a range of small scale developments, including extensions, while having due regards to each site's unique context and potential impacts.</p>
	<p>London City Airport requested that the North Woolwich neighbourhood policy supports an Elizabeth line station at the airport.</p>	<p>No changes relating to the airport have been made. Discussions with TfL and the evidence in the Sustainable Transport Strategy conclude that an Elizabeth line station at London City Airport is not required to deliver the level of housing and employment growth in the Royal Docks.</p>
	<p>The Port of London Authority requested that the policy makes reference to safeguarded wharves, including noise mitigation and those in neighbouring boroughs, and should</p>	<p>The relevant policies have been amended to make reference to safeguarded wharves. However, the policies do not recognise the</p>



	recognise the specific challenges in finding the best route for the Thames Path in the Royal Victoria and North Woolwich neighbourhoods.	particular challenges of finding a route for the Thames Path as this will be addressed during pre-application and application discussions.
	Tate and Lyle requested specific wording changes to better manage the relationship between existing industrial uses and new residential development in the Royal Victoria and North Woolwich neighbourhoods.	The relevant policies have been amended to better address the relationship between industrial and non-industrial uses.
	Lidl argued that the size of supermarkets supported in the neighbourhood policies should be increased as they are below the minimum requirements for a discount food store. Residents and attendees of the Local Plan assemblies want more supermarkets, particularly in the neighbourhoods in the Royal Docks.	The approach to food stores in the Local Plan has changed to allow for more flexibility in the scale of food store supported in local centres. This has been reflected in the relevant neighbourhood policies.
	Residents, local businesses, community groups and attendees of the Local Plan Assemblies had a mix of views on the neighbourhood policy clauses about improvements to Queen's Market. Some would like to see improvements to the market's facilities such as lifts, toilets and improved public realm and safety. Others do not want the market to change whilst some would like to see development for housing at the market.	The neighbourhood policy already addresses the improvements that stakeholders want to see to Queen's Market. It also recognises the importance of Green Street for shopping and protects the specialised retail offer. However, the policy has been amended to support the range of uses that may come forward on the site. These are being explored as part of the Queen's Market and Hamara Ghar Investment Strategy.
	Landowners argued that that Gallions Reach neighbourhood policy is too dependent on the DLR extension and should instead refer to other types of transformative transport measures and argued that more development could be delivered prior to the DLR extension. They requested clarity on the release of safeguarding land for the river crossing.	The Gallions Reach neighbourhood policy has been amended to include reference to transformative transport measures as well as the DLR extension and to clarify the position on the release of safeguarded land for the river crossing.
	The LLDC argued the Stratford and Maryland policy should better reflect the future role of Stratford as an International Centre and should better reflect the aspirations for Stratford Station and its surrounding sites.	The neighbourhood policy already recognises the future role of the town centre as an International Centre but this has been made clearer in the neighbourhood vision and the relevant site allocations. Various policies in the Local Plan support increased capacity and associated infrastructure improvements at the station. The site allocation for

		Stratford Station has been informed the by work on the Urban Design Framework and the Outline Businesses Case as well as our own borough-wide evidence on the need for different uses.
	The Lea Valley Regional Park Authority requested that the Stratford and Maryland and Three Mills neighbourhood should be amended to include elements of the Park Development Framework, particularly for Three Mills Island.	The Three Mills and Stratford and Maryland neighbourhood policies have been amended to reflect elements of the Park Development Framework.
<b>Sites</b>		
	National Grid identified sites which are crossed by or are in close proximity to National Grid assets and requested engagement with them during the development of these sites. Thames Water identified which sites are likely to require upgrades to the water supply and wastewater network. They recommended that developers and the LPA liaise with Thames Water at the earliest opportunity to discuss phasing of development. They also objected to development on some sites due to the proximity of development to their assets.	The site profile, design principles and infrastructure requirements have been updated to reflect Thames Water and National Grid assets and to encourage engagement with them during pre-application discussions.
	The Environment Agency identified flooding constraints on each site as well as identified Source Protection Zones. They requested specific planning conditions for sites within Source Protection Zones.	The site profile, development principles and design principles have been updated in light of the SFRA. Source protection zones are now addressed in the site profiles as well as the Climate Emergency policies.
	Historic England identified site allocations that should support addressing assets currently on the Heritage at Risk Register. They argued that there he possibility that the envisaged quantum of development in Stratford will have an adverse effect on the historic environment in an area that contains the borough's greatest concentration of heritage assets. They requested we understand the	Further work has been undertaken with Historic England to further develop the design principles, particularly in sites in Stratford and Maryland, to manage the impact on heritage assets and to make reference to Conservation Area Appraisals and Management Plans.

	significance of heritage assets and townscape character and how it will be affected by future proposals.	
	Sport England objected to the loss of sports facilities on some sites.	The development proposals have been updated to make explicit reference to sports and recreation facilities to make clear they are protected.
	TfL identified required improvements to public transport and requested developer contributions to fund the improvements as well as improvements to walking and cycling routes on some sites.	The infrastructure requirements and design principles have been updated to reflect the evidence in the Sustainable Transport Strategy. The infrastructure requirements include improvements to public transport where necessary to support development. They do not provide detail on how transport improvements should be funded as this will be considered in line with BNF4.
	A landowner requested that the neighbourhood policies acknowledge the exceptional abnormal circumstances that relate to gasholder sites.	The neighbourhood policies do not address viability requirements. For surplus utilities sites, exceptional costs associated with decontamination will need to be factored into a development's residual land value (with scenarios provided demonstrating appraisals for the scheme with and without the decontamination cost), as well as taken into consideration in a development's benchmark land value.
	A number of new sites were submitted for allocation by both landowners and members of the public. Some landowners resubmitted sites that had not been allocated or identified additional development plots within existing allocations, particularly in Stratford.	The new sites have been assessed in line with the methodology set out in the Site Allocation and Housing Trajectory Methodology Note. One site was allocated based on updated information from the landowner on availability. Another site was allocated due to reconsideration of how the site could be delivered while delivering the Local Plan's objectives regarding open space. Other sites were not allocated as they did not meet the criteria for allocation set out in the Site Allocation and Housing Trajectory Methodology Note. Stratford Town Centre West has been extended to include new development plots.
	CPRE requested that all site allocations on land with existing open space are deleted.	The approach to development on open space has not changed. The approach to site allocations on green space is set out in the Site Allocation and Housing Trajectory Methodology Note. This sets out how open space was considered during the site sifting and site assessment stages of allocating sites. The development principles of the few sites involving open space has been updated to make clear the requirement for reprovision in accordance with GWS1. The site allocations have also

		been informed by the finalised Green and Water Study which has informed the infrastructure requirements for different types of open space on sites, which include parks of different scales across the borough.
	Landowners and developers objected to the level of detail on the site allocation maps, particularly the location of frontages and key routes. Some argued that the maps did not reflect pre-application discussions or planning permissions.	A new approach to how development and design principles are illustrated on the site allocation maps to make clearer the key routes. Some changes were made to reflect changes to site requirements based on updated evidence, such as the location of town centre uses and open space requirements.
	Landowner and developers objected to the inconsistency between maximum heights parameters expressed in meters in the tall building zones and expressed in number of storeys. Some requested greater height on their sites. Residents and attendees raised concerns on heights in some locations due to potential overshadowing and impact on existing residents. The Lee Valley Regional Park objected to the impact of tall buildings on the waterways and on heritage assets in the Three Mills neighbourhood. Historic England requested further detail as to how tall buildings will achieve the conservation and enhancement of the historic environment, particularly for sites in Stratford.	The design principles related to height have been amended to include both storeys and meters. Further detail has been added to manage the impact on heritage assets and on waterways.
	The NHS provided up to date information on the requirements for new health centres as well as progress on NHS-owned sites.	The infrastructure requirements have been refined to reflect comments from the NHS, including the removal of a health centre in Silvertown Quays. The requirements are now subject to a needs based assessment at the time of delivery.
	Tate and Lyle requested specific wording changes to better manage the relationship between existing industrial uses and new residential development, particularly in relation to the location and height of buffer buildings.	The design principles and site allocation maps have been updated to make clearer requirements for buffering buildings on Lyle Park West and Connaught Riverside.
	Some landowners and developers objected to the town centre designations on their site, particularly at Silvertown	The approach to the local centre extension at Silvertown Quays has not changed. A single integrated Local Centre optimises opportunities of the wider location and is logical in terms of relationship with travel patterns

	Quays. Others argued that town centre uses should be located on their sites, outside of designated centres.	and proximity of main town centre uses creating a single cluster. The proposed scale and location of this boundary and other local and town centre boundaries is based on available information regarding additional retail and leisure need in the area. Local Plan policy HS1 allows for the boundary of Local Centre extensions to be flexibly adjusted through masterplanning processes.
	Some landowners and developers objected to the infrastructure requirements on their sites. This included NHS requirements, including specifying the size of health centre required, and leisure centre requirements.	The infrastructure requirements have been updated to the evidence in the Built Leisure Needs Assessment. This includes the removal of a leisure centre on Silvertown Quays. This site has also been amended to support leisure uses in the form of water uses.
	Some landowners and developers objected to the open space requirements on their site, both in terms of quantity and locations. Two landowners argued that their sites should be de-designated from Metropolitan Open Land.	A change has been made to the Metropolitan Open Land boundary has been made at East Ham Gasworks. However, no sites have been de-designated from the MOL as the Newham MOL and Green Belt Review (2024) recommends the MOL remains in place with the exception of the minor boundary change.
	Some landowners and developers objected to employment uses on their site. Some argued it did not reflect pre-application discussions or planning permissions, whilst others argued that employment uses were not suitable on their sites. Some argued that there should be greater flexibility for new office, particularly in the Royal Docks.	The description of acceptable employment uses has been clarified. However, there has been no change to the sites allocated for employment uses given the need for industrial land and the oversupply of offices in the borough.
	Residents and attendees of the Local Plan assemblies requested more community facilities on sites, particularly in Canning Town, as well as more open space, particularly in the east of the borough.	A new policy clause has been added to support community facilities where the Community Facility Needs Assessment has identified the neighbourhood as being below the borough average for community facilities. The finalised Green and Water Study has informed the design principles and infrastructure requirements relating to the type of open space required on sites as well as green infrastructure requirements.
	Residents and attendees of the Local Plan assemblies objected to the loss of Balaam Leisure Centre.	The phasing and implementation section of the Balaam Leisure Centre has been updated to require a new leisure centre to be delivered in the Canning Town neighbourhood prior to any residential development taking place on this site. This is supported by evidence in the Built Leisure Needs Assessment.

	<p>The LLDC argued the Stratford Station site allocation should better reflect the aspirations of the Outline Business Case and the Urban Development Framework, particularly in terms of the site allocation map and the mix of uses. They also requested that some sites in the LLDC Local Plan are carried forward into the Newham Local Plan.</p>	<p>Various policies in the Local Plan support increased capacity and associated infrastructure improvements at Stratford Station. The site allocation for Stratford Station has been informed by work on the Urban Design Framework and the Outline Businesses Case as well as our own borough-wide evidence on the need for different uses. An assessment of the existing LLDC Local Plan site allocations in Newham has been undertaken during the preparation of the Draft Newham Local Plan as set out in the Site Allocation and Housing Trajectory Methodology Note. The majority of the site allocations have been included and updated to ensure alignment with our approach to sites and to reflect our borough-wide evidence on the need for different uses. This process also identified some sites that were no longer required due to their delivery status. Two further sites did not meet the criteria to be included as site allocations.</p>
	<p>Landowners argued that that Beckton Riverside is too dependent on the DLR extension and should instead refer to other types of transformative transport measures and argued that more development could be delivered prior to the DLR extension, particularly in relation to building heights. Thames Water objected to the allocation given the adjacent sewage works.</p>	<p>This approach outlined in the site allocation has now changed to support suitably scaled and located deadweight development and reflect the potential for an alternative transport intervention (if confirmed by Transport for London) to enable development have now been included. The site allocation wording has also been updated to include the range of transport infrastructure changes which could occur on this site and which would then impact the scale and nature of potential development and which therefore need to be factored into masterplanning of the site. No changes have been made to the site allocation in response to Thames Water's odour concerns as there are sufficient policy requirements to ensure that odour and odour mitigation are considered at application stage. Initial work is also already being undertaken, in consultation with Thames Water, to consider in more detail the potential odour impacts and any required mitigation.</p>
	<p>Residents and attendees of the Local Plan assemblies and the River Roding Trust argued for site allocations in East Ham to support the reopening of the Back River.</p>	<p>The development principles for East Ham Gasworks have been updated to require the developer to explore the reopening of the Back River.</p>
	<p>Friends of Queens Market object to a site allocation for major redevelopment on the site, arguing that there is a</p>	<p>The Queen's Market site allocation has been removed from the Local Plan due to the on-going work the Council is undertaking with the local</p>

	<p>lack of information for the public and it will result in the loss of the market. Attendees of Local Plan assemblies had mixed views on development at Queen's Market. Some argued that Queen's Market should be protected whilst others supported the site allocation and housing on the site.</p>	<p>community as part of the Queen's Market and Hamara Ghar Investment Strategy. The Strategy is looking at what uses and what type of development may take place across the site allocation and these options were included in the Draft Local Plan. However, as this work has not yet concluded at the time the submission draft is being finalised, the site allocation has been removed from the Local Plan. This is because we must be able to demonstrate that a site is suitable, available and achievable and is therefore deliverable. To demonstrate this to a Planning Inspector at the Local Plan Examination, we require certainty on which option is being progressed by the Council as the landowner. The removal of the site allocation does not prevent the options being looked at from coming forward and policies in the Local Plan continue to protect the market, support improvements to the facilities at the market and its public realm as well as support a range of uses that may come forward on the site.</p>
--	---	--

## 3.4 Regulation 18 Consultation and Engagement activities

### 3.4.1 What we did - Consultation & Engagement activities

This section of the report provides a detailed overview of the methods used for consultation and engagement during the Draft Local Plan (Regulation 18) consultation.

#### 3.4.1.1 Overview

The Local Plan Engagement Strategy provided a framework for the methods of engagement with residents and other stakeholders during the Local Plan Refresh and specifically for the Regulation 18 consultation.

A variety of existing and innovative engagement methods were utilised throughout the consultation process. A primary aim of the engagement strategy was to apply methods that empowered participants with the skills and confidence to provide detailed feedback on policy wording within the Local Plan Review. This was achieved by informing residents on the Local Plan and why it is important, the plan-making process, and what can be achieved through planning and through engagement activity. Co-production methods were employed to review and amend the draft Plan. Additionally, the engagement strategy also aspired to make consultations more accessible and effective, creating a building block for future engagement.

Engagement activities were also developed in accordance with plan-making legislation, national planning policy, and the principles set out in the Newham Statement of Community Involvement. We employed methods to meet our statutory requirements such as issuing a public notice and making hard copies of the Local Plan available in libraries. Furthermore, we also employed innovative methods to enhance engagement from the previous consultation, including postcard drops and community events.

The engagement activities were divided into three categories, each of them with a different objective (see Figure 3.1).

1. Initial engagement was broadcast through emails, the Council's website, social media, press releases, a public notice, a promo video, public advertisement boards, internal communications, promotional postcards, site posters and Local Plan Summary factsheets.
2. After broadcasting the Regulation 18 consultation, the engagement process transitioned into listening to ideas and opinions, through a combination of online and hard copy questionnaires, Newham Co-Create, an online informative workshop, and written responses.
3. The final phase of the engagement expanded on the listening phase to co-producing. This phase was undertaken through a series of drop-in sessions, community events, and Local Plan community assemblies.





**Figure 3.1: Engagement Activities**

#### 3.4.1.2 Equalities & Accessibility

The methods outlined above (see Figure 3.1) were tailored to address any equalities considerations in accordance with the Equality Act 2010. Various measures, such as adopting a consistent approach to engagement and finding alternatives for potentially digitally excluded stakeholders have been implemented throughout the consultation.

During the broadcasting stage, we used the press release, public advertising boards, postcards, and site posters to inform those who are digitally excluded about the upcoming consultation and how to respond. During the listening stage, hard copies of the questionnaire and Local Plan were made available at libraries and could be ordered for home delivery if residents were unable to attend in-person due to shielding. Additionally, written responses allowed those digitally excluded to submit a response via mail, enabling those without digital access or a lack of mobility to engage with the Local Plan. Finally, during the co-producing and exploring stage, drop-in sessions and community assemblies allowed for in-person co-production. This ensured that engagement and consultation was carried out in an equitable and accessible way, providing opportunities for all to participate.

Promotional postcards were sent to postcodes with a higher percentage of underrepresented groups during the Issues and Options stage, additionally translated text was added to postcards, referring residents to the online portal where they could use digital translation tools. Another method was specialised youth workshop involving the young commissioners to engage young residents. Furthermore, community groups were emailed to offer a bespoke tailored presentation to address issues of interest in the plan.

#### 3.4.1.3 Duty to Cooperate

Engagement with Duty to Cooperate bodies has been on-going throughout the Local Plan Review. Further information can be found in the Duty to Cooperate Report, and the responses from Duty to Cooperate bodies, along with our response to them, can be found in [Appendix 1](#).

## 3.4.2 How we Engaged

### 3.4.2.1 Broadcasting

#### 3.4.2.1.1 Emails

The use of email distribution lists was to notify a wide range of stakeholders about the consultation. It provided information about the various ways to submit responses as well as information about the consultation events. This was the primary method of reaching our statutory consultees on the Draft Local Plan.

Three rounds of emails sent to the Planning Policy Consultation database. An email was sent during the soft launch period, followed by another email on the first day of the consultation ([see Schedule 1](#)). Reminder emails were sent during the final week of the engagement period.

Although the emails sent to the Planning Policy database reached 1,388 subscribers, the actual outreach was much higher. This was due to various teams across the Council and local organisations forwarding our emails to their subscribers on behalf of the Planning Policy team, as well as those registered on Newham Co-Create.

The organisations and stakeholders that assisted in sending out the email to their respective lists is provided below:

- Newham Planning Policy Database
- Newham Co-Create
- London Legacy Development Corporation Planning Database
- Community Neighbourhoods
- Royal Docks team
- Newham Staff via Newham News
- Mayor's Resident Bulletin
- Public Health and Covid-19 Champions
- Community Assembly Steering Groups
- Citizen's Assemblies
- Compost
- Inter-faith Forum
- Older People's Reference Group
- Ageing Well Residents' Group
- Faith Group
- Newham United Dialogue
- Businesses Newsletters
- Newham Events

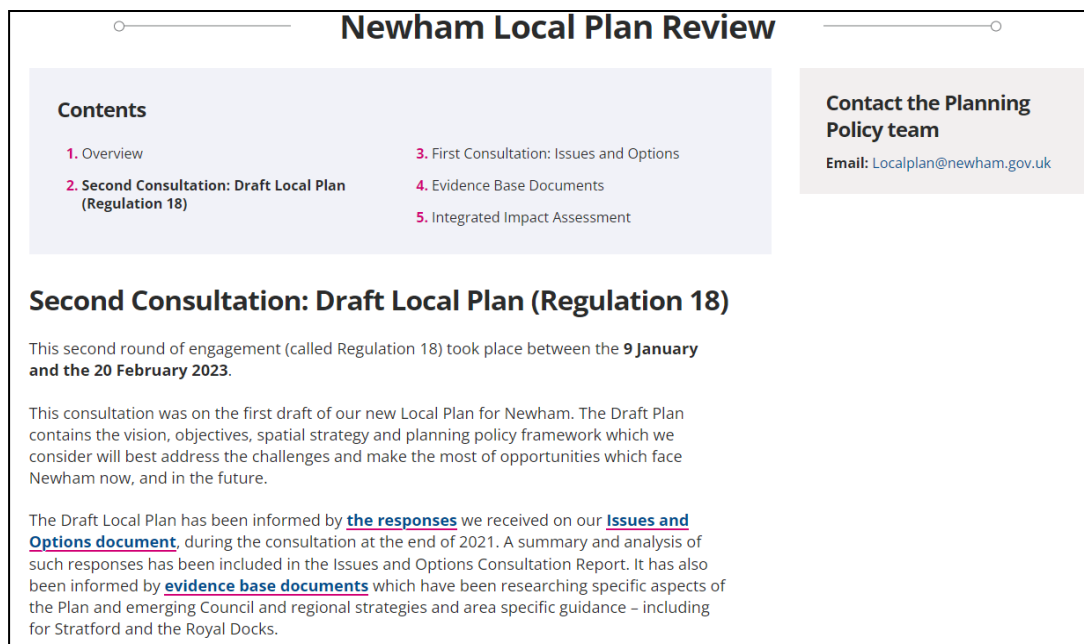
Officers within the LBN Planning Department included a message about the consultation in their email signatures those already engaged with the planning system, such as developers and landowners.

### 3.4.2.1.2 Council Website

The Draft Local Plan was published on the [Council's website](#) at the start of the soft launch period (see Figure 3.2), on the Newham Local Plan Review webpage. The evidence base and the Integrated Impact Assessment were also published on the Local Plan Review webpage.

The Local Plan Review webpages not only provided a list of ways to submit responses but also provided a significant amount of information about plan-making and the Local Plan Refresh process, aiming to expand residents' planning knowledge. This content included the promotional video.

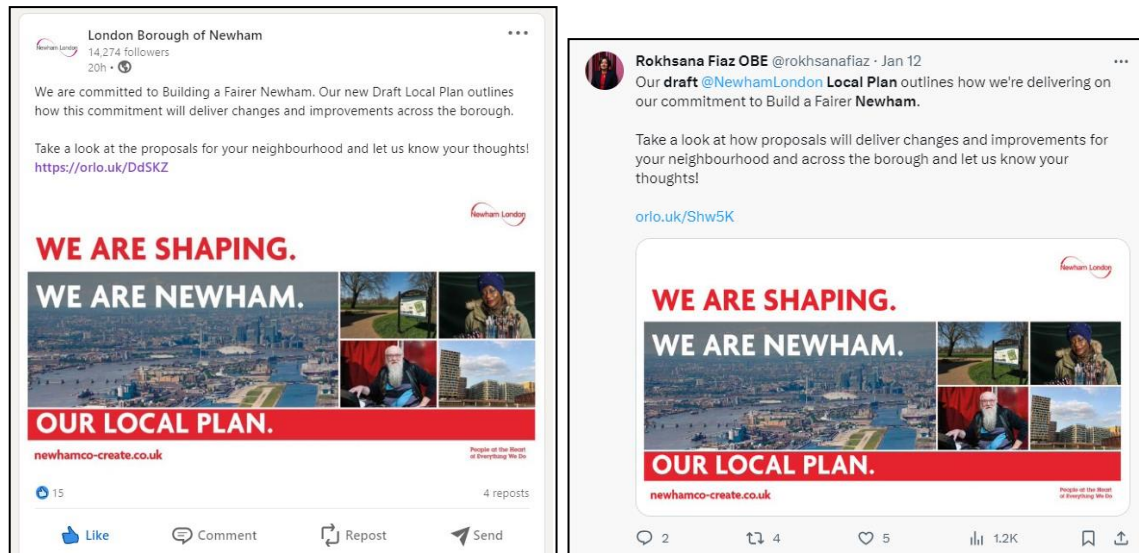
Additionally, the website provided a link to Newham Co-Create, helping to connect stakeholders who frequent the website to Co-Create, including developers, landowners and residents.



**Figure 3.2 – Council Webpage**

### 3.4.2.1.3 Social Media

The platforms Facebook, Instagram, X (twitter) and LinkedIn were used to broadcast the consultation (see Figure 3.3) and to invite people to attend our Community Assemblies, online informative workshop and drop-in session. Some of posts on these platforms contained important information regarding each planning theme, ensuring stakeholders were well-informed on the focus of this consultation. Other posts focused on aspects of the plan which may have been of particular interest to various residents, helping to highlight the role and importance of the Local Plan and prompt interest in responding.



**Figures 3.3 - LinkedIn post from LBN and 3.4 - Twitter posts by the Mayor**

Some posts were re-shared on Councillors' social media accounts, in the Youth Zones' Instagram account, as well as the Mayor of Newham's account (see Figure 3.4).

Across our paid social media posts we generated 203,650 impressions (views of a post), 501 clicks (clicks on post taking you to our website), at a Click through Rate (CTR) of 0.25% (clicks as a percentage of total impressions).

#### 3.4.2.1.4 Press Release

Press releases were sent to the [Newham Recorder](#) and published on the 8<sup>th</sup> of February 2023 ([see Schedule 2](#)), aiming to reach digitally excluded residents or those without access to social media. This approach ensured a balance between digital and print media channels and aimed to encourage readers to provide feedback on the draft Local Plan.

An article about the Local Plan was also included in the Newham Mag, which is delivered to every household in Newham ([see Schedule 3](#)).

#### 3.4.2.1.5 Public Notice

A public notice was published in the Newham Recorder at the beginning of the engagement period, outlining the consultation dates and the various methods use to provide comments ([see Schedule 4](#)).

#### 3.4.2.1.6 Promo Video

For the Regulation 18 Consultation promo video, the Issues and Options consultation video was updated to explain the purpose of the Regulation 18 consultation. It was released during the consultation period on 8<sup>th</sup> February 2023, effectively contributing to various engagement methods as it could be published across social media, the Council's website, Co-Create and YouTube.

See the video here: [What does the Local Plan do](#)

#### 3.4.2.1.7 Public Advertisement Boards

Public advertisements were displayed on JC Decaux boards in public spaces across the borough, including the Westfield Centre, with a variety of 8 different posters, one for each Community Neighbourhood Area, across 33 boards. These posters provided a summary of with main policy changes related to that area (see Figures 3.5). The graphics were designed in line with the Council's branding guidelines and included a QR code that directed people to Co-Create. Additionally, smaller posters were placed in library bulletin boards. This aimed to reach people living and working in Newham, reaching them as they went about their daily activities.



**Figures 3.5 - Public advertisement board in East Ham**

#### 3.4.2.1.8 Internal Communications

Internal communications were used to inform the Council staff about the Regulation 18 consultation. Promotional materials were added to Newham News and the Intranet, including an email template and the promo video, which were shared with Council staff. This method informed Council staff about the consultation and encouraged them to respond as key stakeholders, as well as to share the details with residents and other stakeholders they work with.

#### 3.4.2.1.9 Postcard Drops

Promotional postcards were delivered to a sample of Newham's population, providing residents with a prompt and guide on how to approach the Draft Local Plan document and provide feedback. A total of 40,000 postcards were ordered and delivered to a sample of Newham's population as well as being made available in libraries and handed out at events. The selection of this sample was based on the analysis of demographic data from the Census in Newham and via postcode, aiming to address any demographic and geographic gaps identified in the previous round of engagement.



The postcards included the details of the online informative session, Local Plan Assemblies, drop-in session, a QR code to access Co-Create, and the contact information to respond to the Planning Policy Team. Information on how to access co-create was translated into Arabic, Bangla, Romanian, Tamil and Urdu ([see Schedule 5](#)).

#### 3.4.2.1.10 Site Posters

Site posters aimed to make residents aware of the specific sites included in the Draft Local Plan as site allocations, and encourage them to provide feedback on the proposals for these sites. Each poster included a site map, a summary of the site allocation including development principles, design principles and infrastructure requirements for the site. The posters also featured a QR code linking to Co-Create ([see Figure 3.6](#)), enabling respondents to submit feedback on the site proposals.

A total of 118 A3 posters were strategically placed near the proposed 44 site allocations in the Local Plan, with a range of 2 to 4 posters per site, reflecting access routes to the site.



**Figure 3.6 – Stratford Central Site Poster beside site location**

#### 3.4.2.1.11 Factsheets

Factsheet were created for each of the key themes of the Draft Local Plan, offering residents a simplified summary of the main policies in the plan ([see Figure 3.7](#)). They included concise summaries of the Issues and Options consultation feedback, the evidence findings and the resulting Draft Local Plan proposals. The factsheets were made available on the [Council's website](#), Co-Create and at in-person events.

WE ARE SHAPING. NEWHAM DRAFT LOCAL PLAN. WE ARE NEWHAM.

**YOU SAID, WE DID: HIGH STREETS**

During our Issues and Options engagement in 2021, you said	Our evidence says	The Plan proposes
<ul style="list-style-type: none"> <li>• Increase the variety of shops and facilities on Newham's high streets.</li> <li>• The 15 minute neighbourhood concept should be carefully applied so that it does not result in less access to day-to-day goods and services.</li> <li>• A proactive approach should be taken toward enabling and managing the visitor, evening and night-time economy.</li> <li>• There are still too many betting shops and hot food takeaways, which needs to be addressed.</li> <li>• The public realm needs to be more attractive and enable social interaction and community development. Need more alfresco spaces and street markets.</li> </ul> 	<ul style="list-style-type: none"> <li>• Newham's existing Town and Local Centres are serving local needs well, have lower vacancies than national average and are evolving in line with national trends.</li> <li>• There is a need to balance opportunities for increasing variety in our centres with the need to promote and protect retail and leisure in Primary Shopping Areas.</li> <li>• There are more parts of established high streets that could be protected. Alongside delivery of new Local Centres, these will help to address gaps in access to groceries and services in the existing protected network.</li> <li>• With the exception of Stratford, the visitor evening and night-time economy is not well established in Newham's centres and many residents travel out of the borough to access leisure and culture activities.</li> <li>• Markets make a significant contribution to the success of Newham's centres.</li> <li>• Two-thirds of adults and 43% of children in Year 6 are carrying excess weight. 1 in 3 children have tooth decay.</li> </ul> 	<ul style="list-style-type: none"> <li>• To promote shops, cafes and restaurants, services, offices and workspaces within the Primary Shopping Areas of Town and Local Centres.</li> <li>• To support meanwhile uses, pop-ups/events and the multi-functional operation of buildings, promote affordable small commercial units, enhance and activate public realm, and protect existing markets and support the creation of new ones.</li> <li>• A new requirement for every home to be within 400m of a designated shopping area, or within 15min walking distance of at least two shopping areas. New Local Centre and Neighbourhood Parade designations to address gaps and further protect well-functioning high street frontages.</li> <li>• Support for the retention of established corner grocery shops in areas which are further away from protected shopping areas.</li> <li>• To promote evening and night-time uses in suitable locations, with the highest concentration allowed in the largest town centres.</li> <li>• Tightening of the concentration criteria for hot food takeaway and all types of gambling premises. Healthy eating catering standards promoted for all food-based businesses, and marketing standards to promote responsible operation of pawn shops, pay day loan shops and gambling premises (where no over-concentration).</li> </ul>

**Figure 3.7 – High Streets factsheet published on the website**

### 3.4.2.2 Listening

#### 3.4.2.2.1 Online Informative Workshop

The online informative workshop was held on 16<sup>th</sup> January 2023. This engagement method provided an informative session introducing the Local Plan, why it is important, and outlining what can be achieved through planning. The workshop further explained the structure and main policy changes to the Draft Local Plan, while guiding participants on how to engage and provide comments (see Figure 3.8). The session concluded with a Q&A session with the Chief Planning Officer.

For convenience of those unable to attend, the session was recorded and uploaded to Co-Create and the Council's website.

**NEWHAM'S DRAFT LOCAL PLAN: INPUTS TO DATE**

**Issues and Options Consultation**  
October to December 2022

- 9 pop-up stalls across the borough and 1 youth pop-up stall.
- 8 Community specific events (attended on invitation from the group).
- 2 online workshops.
- 7 themed co-production workshops and 1 co-production workshop for young people

386 representations  
5,207 comments  
74% residents

Consultation Report available on our website

**Evidence Base**

- Characterisation Study 2022
- Strategic Housing Market Assessment and Gypsy and Traveller Accommodation Assessment 2022
- Retail and Leisure Assessment 2022
- Employment Land Review 2022
- Climate Change Evidence Base 2022
- Community Facilities Needs Assessment 2022
- Waste Plan Evidence Base 2022
- Site Allocation and Housing Trajectory Methodology 2022
- Built Leisure Needs Assessment
- Green and Blue Infrastructure Study
- Playing Pitch Strategy
- Sustainable Transport Study
- Water and Flood Risk Studies

All reports available on our website

**WE ARE NEWHAM.**

**BUILDING A FAIRER NEWHAM**

Figure 3.8 – Online informative workshop

#### 3.4.2.2.2 Co-create

The Co-Create online platform provided an online space for people to submit consultation responses in multiple ways and centralised digital engagement within a single platform.

The Co-create webpage for the Regulation 18 consultation had several key resources including: the promotional video, factsheets on each of the key themes of the Draft Local Plan, the Typeform questionnaire to provide feedback on the policy proposals, and the dates and registration details of the Regulation 18 consultation events.

The Co-Create webpage included an interactive pdf reader (Konveio) to host the Draft Local Plan (see Figure 3.9), allowing users to provide comments in-situ directly onto the part of the plan they wanted to comment on. Konveio also featured a summary of the Draft Local Plan highlighting its key themes.

Table of Contents Page 1 of 504 Type to search Drag

**WE ARE NEWHAM**  
**WE ARE SHAPING**  
**OUR LOCAL PLAN**

**WE ARE NEWHAM.**

**DRAFT LOCAL PLAN (REGULATION 18) FOR CONSULTATION**  
December 2022

**BUILDING A FAIRER NEWHAM**

Summary Full Document

Powered by Konveio



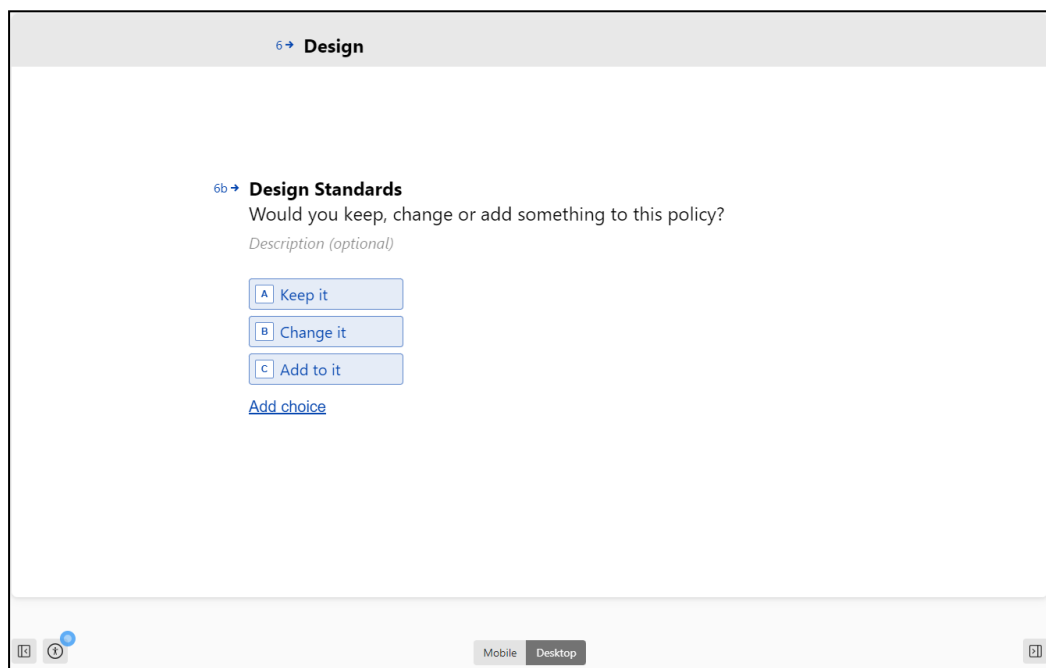
**Figure 3.9 – Konveio Draft Local Plan**

### 3.4.2.2.3 Questionnaire

The questionnaire provided a structured way for stakeholders to comment on the Local Plan. The first section included questions on the different Local Plan chapters and policies, asking stakeholders to provide comments on what to keep or change on the policy and whether anything should be added to the policy (see Figure 3.10). Following this, an open question provided an opportunity to share any other feedback stakeholders had about the policy and the plan as a whole. The final section of the questionnaire included an optional demographic survey to better understand who responded to the consultation.

Digital access to the questionnaire was facilitated through Co-Create using the survey software Typeform, allowing residents to conveniently submit their responses. Hard copies were also made available in local libraries along with hard copies of the Draft Local Plan.

To ensure inclusivity, residents with limited mobility or the need to shield were able to order a physical copy of the Draft Local Plan with the questionnaire, to ensure nobody was excluded from participating.



The screenshot shows a web browser window displaying a questionnaire. At the top, a grey header bar contains the text "6 → Design". Below this, the questionnaire content is displayed on a white background. It starts with a section header "6b → Design Standards" in bold. Below the header is the question "Would you keep, change or add something to this policy?" followed by the text "Description (optional)" in a smaller, lighter font. There are three blue rectangular buttons with white text: "A Keep it", "B Change it", and "C Add to it". Below these buttons is a blue link that says "Add choice". At the bottom of the browser window, there is a grey bar with "Mobile" and "Desktop" tabs, and a small icon in the bottom right corner.

**Figure 3.10 – Questionnaire**

### 3.4.2.2.4 Written responses

This method provided a conventional method of written response, stakeholders had the flexibility to respond by emailing to the Newham Local Plan inbox, responding to the digital version of the Local Plan found on the Council's website or via Co-create.

Stakeholders could also use a hard copy of the Local Plan, which included the contact information of the Planning policy team at our events in libraries or send comments in the post. This option catered to those who are digitally excluded, ensuring broader engagement with the consultation. This information was also shared on Co-create, the Council's website, postcards and notification emails.

#### 3.4.2.2.5 Hard copies of the Draft Local Plan

Hard copies of the Draft Local Plan were located in all local libraries. Additionally, residents with limited mobility or the need to shield were able request the delivery of the Draft Local Plan, ensuring nobody in the Borough was excluded from engaging in the consultation.

### 3.4.2.3 Co-Developing & Exploring

#### 3.4.2.3.1 Drop-in Session

A drop-in session took place on Saturday 28<sup>th</sup> January 2023, from 11:00-13:00 at East Ham Library providing an opportunity for engagement with residents and local groups.

During this session, residents could pose queries to the Planning Policy Team regarding the Draft Local Plan and provide feedback on all aspects of the Plan. Factsheets were provided at the event and made available on the Council Website. Residents were able to leave written comments, examine maps and graphics developed as part of the Local Plan's evidence base. Prompt questions were used by the team to help facilitate discussions and gather feedback (see Figure 3.11).



**Figure 3.11 – Drop in session photos**

#### 3.4.2.3.2 Community Events

This engagement method aimed to enhance participation from residents who had not been reached in previous rounds of consultation. We identified representatives of communities who were underrepresented in the previous round of consultation and community representatives that have relevance to specific policies.

A total of 245 relevant groups were identified and sent personalised emails containing links to the 'you said, we did' factsheets, a guide on how to respond, and an invitation from the Planning Policy team to attend their local meetings to discuss proposed policies. This approach sought to tailor

engagement efforts to specific community needs and foster meaningful discussions on proposed policies.

Despite reaching out to 245 relevant groups we saw little uptake in response, resulting in two meetings with relevant groups. We held one meeting with the homelessness forum, with an estimated 20 people in attendance, and another with Shelter, where approximately 12 people attended.

### 3.4.2.3.3 Local Plan Community Assemblies

This engagement method aligned with the Mayor's manifesto commitment to use Community Assemblies for Local Plan engagement on the neighbourhood policies, creating an informal space for policy discussion and feedback. A series of Local Plan Community Assemblies were arranged, working collaboratively with the Community Neighbourhood teams and the People Powered Places team.

The neighbourhood policies and site allocations were presented to the 8 Community Assemblies for open discussions between the 19<sup>th</sup> January and 9<sup>th</sup> February 2023, with an estimated total of 231 attendees in-person and online. The specific dates, time, venue and location are detailed below (see Table 2). Each Local Plan Assembly focussed on different geographically-relevant groupings of Local Plan neighbourhoods.

Location	Venue	Date	Time
Beckton & Royal Docks	Royal Docks Learning & Activity Centre	31/01/2023	17:30 – 20:30
Canning Town & Custom House	Custom House & Canning Town Neighbourhood Centre	24/01/2023	17:00 – 20:30
East Ham	East Ham Library	09/02/2023	17:00 – 20:00
Forest Gate & Maryland	Forest Gate Learning Zone	19/01/2023	17:00 – 20:30
Green Street	Katherine Road Community Centre	06/02/2023	17:00 – 20:00
Manor Park & Little Ilford	Jack Cornwell Community Centre	26/01/2023	17:00 – 20:00
Plaistow	Plaistow Library	02/02/2023	17:00 – 20:00
Stratford	Hopkins Room, Stratford Library	08/02/2023	17:30 – 21:00

**Table 2: Showing locations and dates of Local Plan Assemblies**

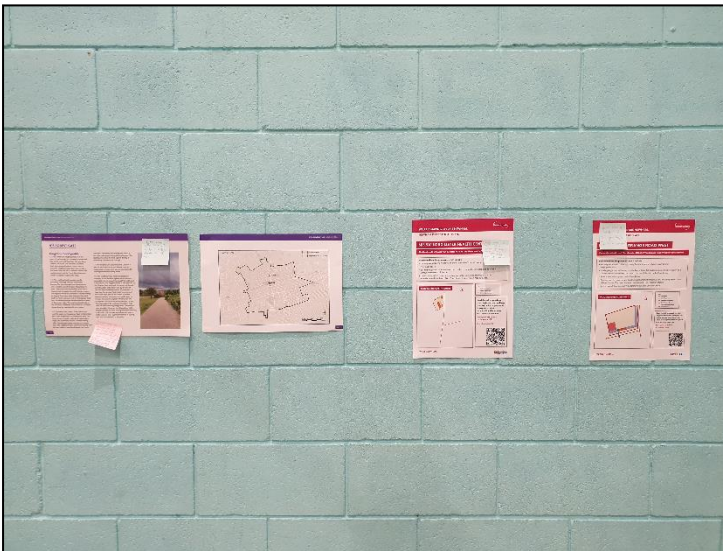
These sessions commenced with a presentation to explain to residents what the Local Plan is, why it is important, and what is achievable through planning. This was followed by an explanation of the timeline of the plan making process, and a question and answer session.

Following this, there were a series of activities facilitated by council officers with the purpose of encouraging residents to provide feedback on the strengths, challenges and opportunities for development and growth in their neighbourhood and the sites within them.

Each Assembly was a hybrid event, with the in-person event streamed so online attendees could watch the presentation and participate in the Q&A. The activities were then facilitated online by a Council officer, using Jamboards (see Figure 3.17). Residents were asked at the beginning of the session which neighbourhood they were most interested and were directed to the right table or Jamboard to cover that neighbourhood.

Two activities facilitated the feedback. The first involved residents reviewing the relevant neighbourhood boundary, vision and policy, discussing what they would like to keep, change or add, with residents using post it notes to provide their responses (see Figure 3.13).

The second activity entailed residents reviewing neighbourhood profiles and site allocation summary posters, offering feedback what they would keep, change and add to the neighbourhood profile and site allocations. Residents added their feedback to the posters using post-it notes, as illustrated in (see Figure 3.16).



**Figure 3.12 Plaistow Community Assembly & 3.13 Plaistow neighbourhood policy posters and comments**





**Figure 3.14 Plaistow Community Assembly**



**Figure 3.15 Stratford Community Assembly & neighbourhood policy posters and comments**

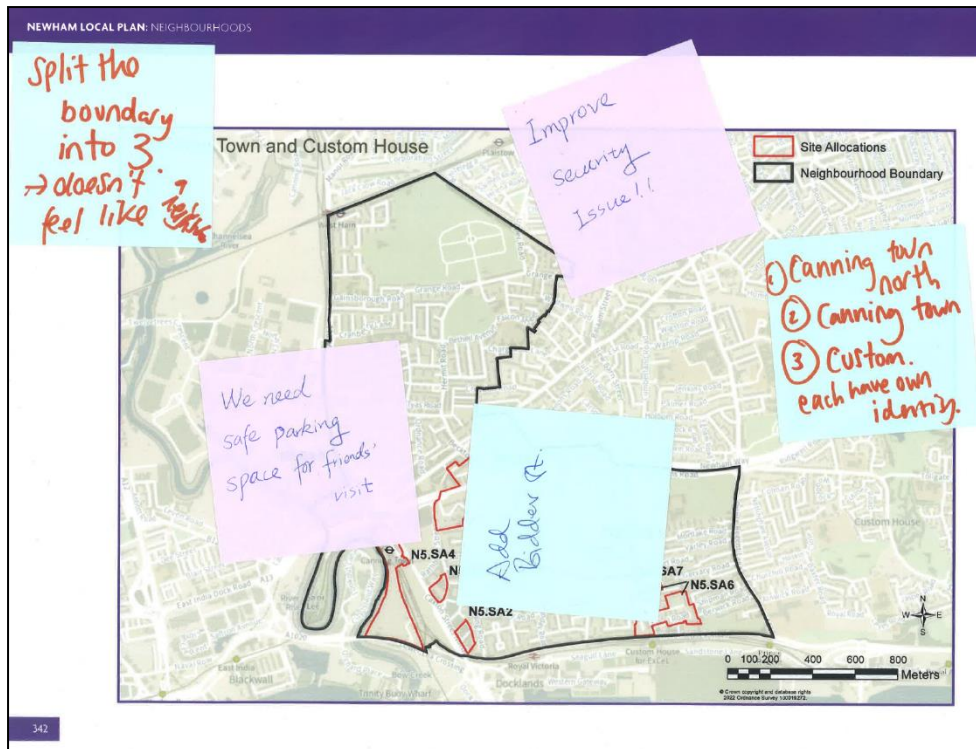


Figure 3.16 – Canning Town and Custom House Assembly Comments

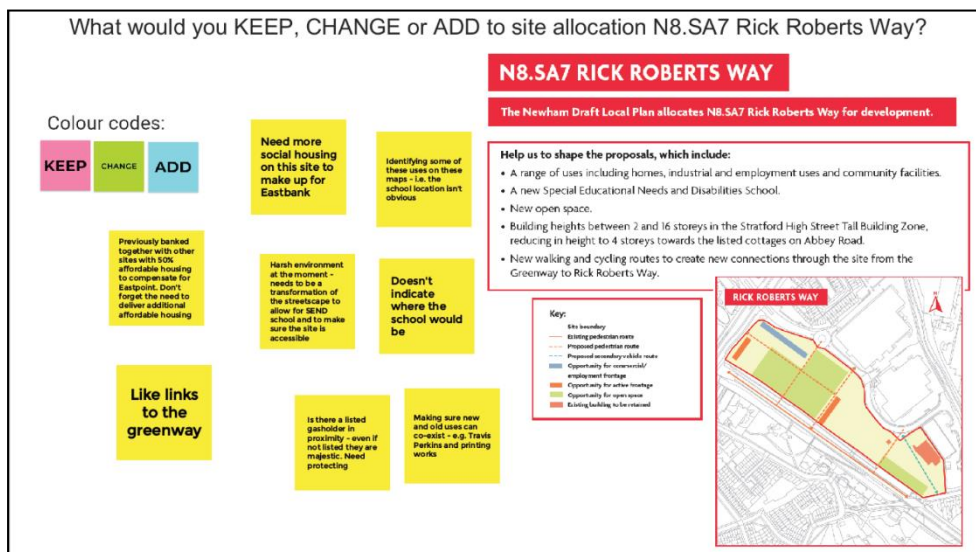


Figure 3.17 – N8.SA7 Rick Roberts Way jamboard from the Stratford and Maryland Community Assembly

### 3.5 Who Responded

This chapter aims to provide a breakdown of respondents, identifying successfully engaged stakeholders during the Draft Local Plan Regulation 18 consultation and highlighting areas that require further focus in the next round of consultation.

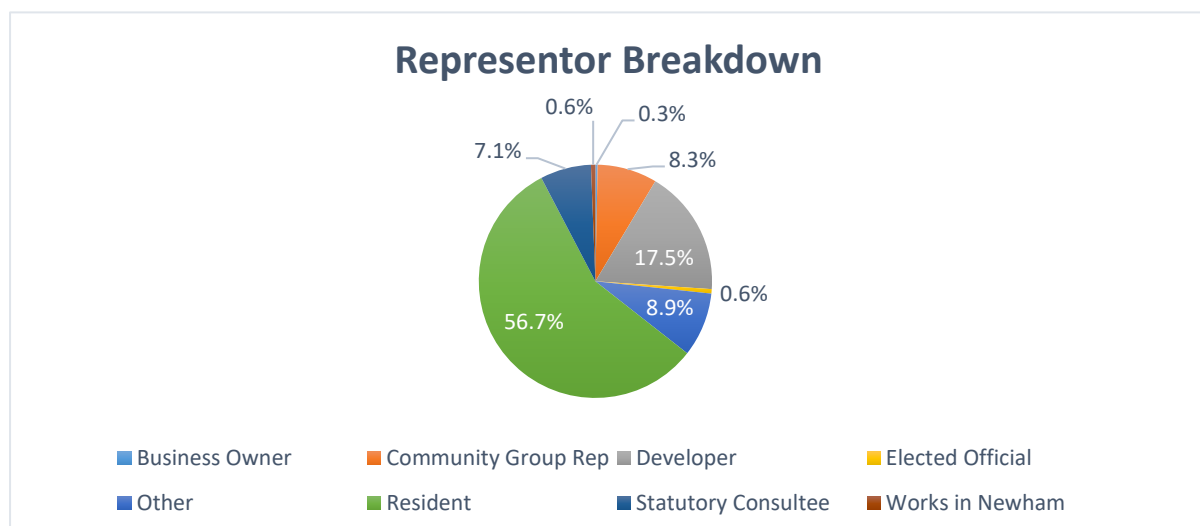
A total of 325 representations were received, and an estimated 335 people attended in-person events in response to the Regulation 18 consultation. Some of these attendees may also be representors, as they may have engaged using digital methods following the in-person events. Of these 325 representations, a total of 8388 comments were generated.

It is crucial to note the distinction between a representors, attendees, representations and comments. A representor refers to a stakeholder who has submitted a representation. A representation represents a single submission, or an in-person event where multiple people attended. This distinction is made because attendees at some of the in-person events were not asked to identify themselves when they made comments, so it was not possible to ascertain which attendees contributed. Consequently, analysing the attendees for the in-person methods provides a more accurate representation of engagement levels with each method. Comments represent each piece of feedback left by representors and attendees, who were able to leave multiple comments.

It is also important to acknowledge that providing information through any of the methods and in response to any of the questions was optional. Consequently, not all representors responded on all aspects of the plan and providing the equalities data was also voluntary so we do not have complete data on all representors.

### 3.5.1 Representors

A breakdown of representations according to representors (see Figure 3.18). Residents are the most prevalent representor group, constituting 56.7% of representations. Following closely were Developers at 17.5%, Other<sup>1</sup> at 8.9% and Community group rep at 8.3%. For the full list of representors ([see Schedule 6](#)). The data showed an increase in developer engagement at the Regulation 18 stage compared to the Issues and Options stage, where developers made up only 4% of representors. This increased engagement was to be expected as this was the first statutory stage of consultation, providing stakeholders with the first opportunity to respond to draft policies.



**Figure 3.18 – Representor Breakdown**

<sup>1</sup> The category 'Other' is used for representors that did not provide any information regarding their stakeholder role when submitting a response.

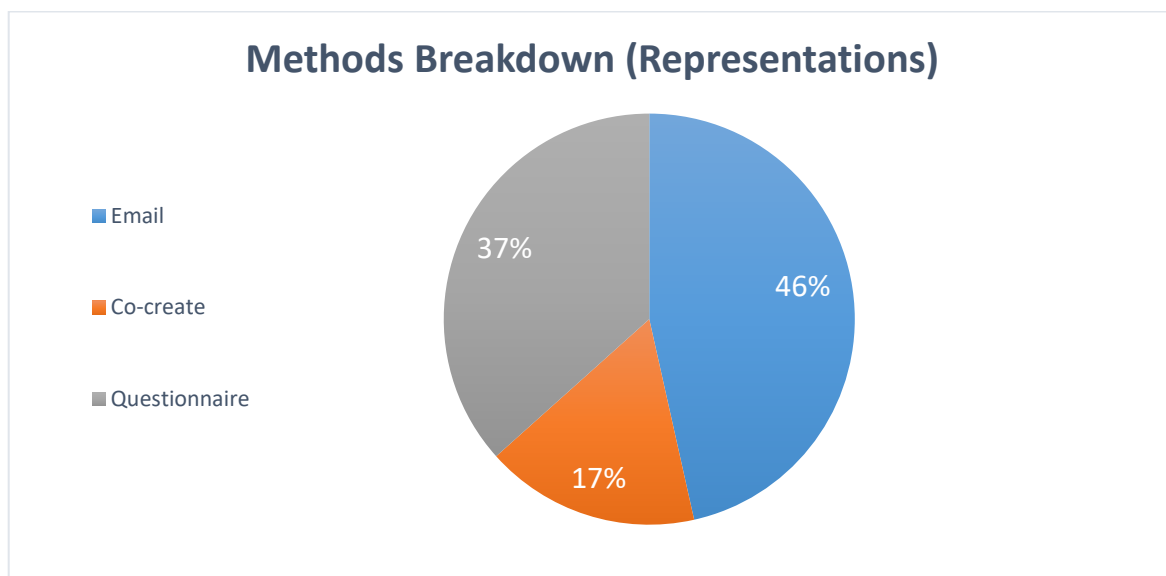


### 3.5.2 Methods

The digital and in-person methods of engagement have been analysed separately, considering representations for digital methods and attendees for in-person methods, as each in-person event only counted as one representation. The most popular digital method was email, generating the most representors. The most popular in-person method was community assemblies, bringing in the most attendees. Although this was expected as we held 8 community assemblies, and just 1 drop-in session, 1 young commissioner workshop and 2 stakeholder meetings.

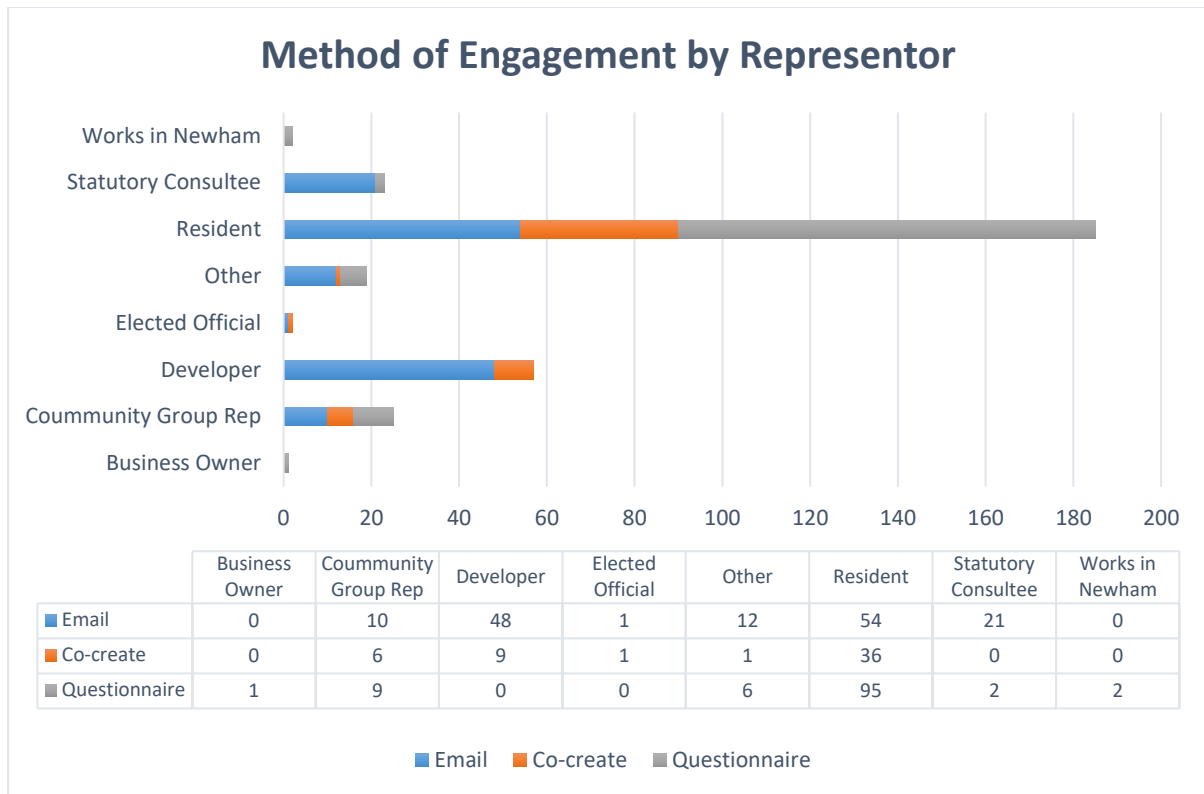
#### 3.5.2.1 Breakdown of representations by digital methods

The chart below (see Figure 3.19) illustrates the breakdown of representations by digital methods of engagement. Email returned the highest number of representations, accounting for 46%, followed by the questionnaire at 37%, and Co-Create at 17%. Compared to the Issues and Options stage, where the questionnaire only made up 20% and email constituted 31% of representations, while Co-Create contained 49% of representations, this consultation we saw a shift towards more email and questionnaire representations and away from Co-Create.



**Figure 3.19 – Methods Breakdown (Representations)**

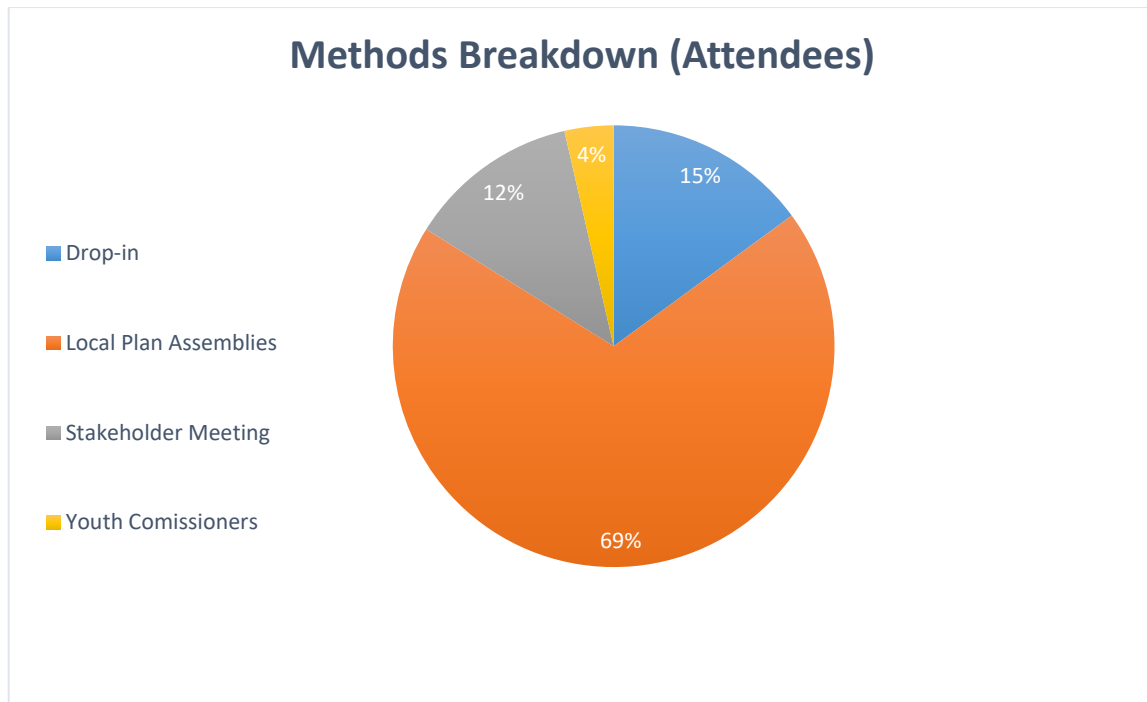
Analysing the method of engagement by representor type (see Figure 3.20) revealed variations in the preferred engagement methods among different representor types. Residents were more likely to use the questionnaire, with 51.4% opting for this method. In contrast, developers and statutory consultants more commonly used email to respond, with 84.2% of developers and 91.3% of statutory consultants choosing for this method.



**Figure 3.20 – Method of engagement according to representor**

#### 3.5.2.2 Breakdown of attendees of in-person events

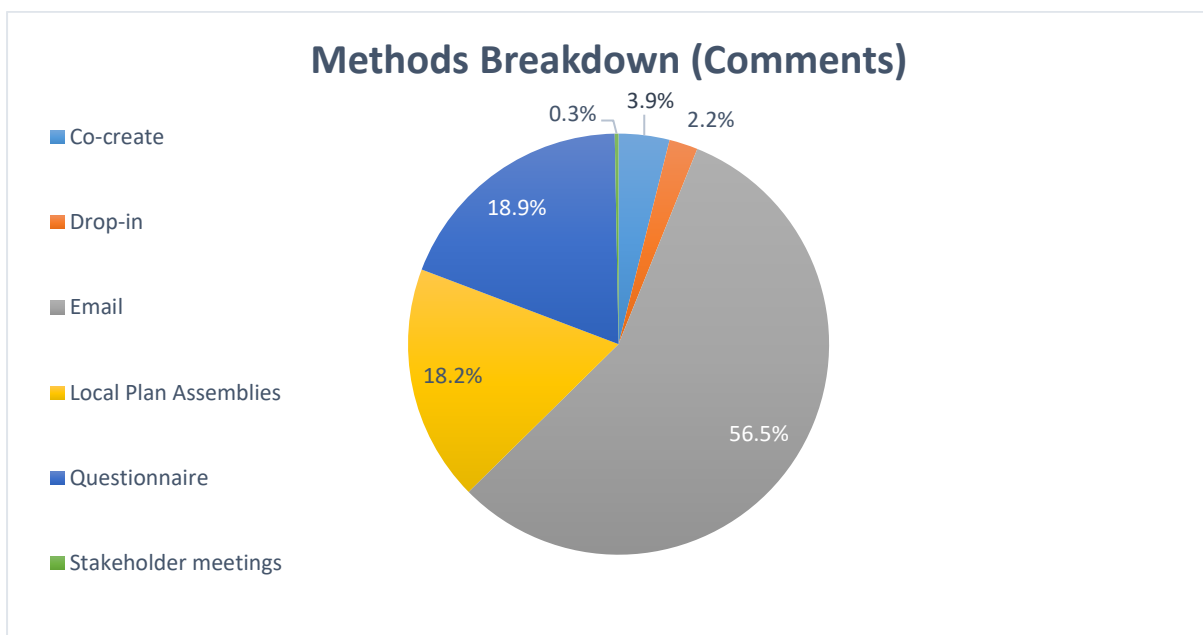
The chart below (see Figure 3.21) displays the breakdown of attendees for different in-person methods of engagement. The data shows that Local Plan Assemblies were the most common in-person method of engagement, with 69% of attendees, followed by the Drop-in session with 15% and Stakeholder meetings with 12% of attendees. Local Plan Assemblies attracted more attendees than representors, signifying its significance in generating engagement. While we cannot determine how many of the individual attendees contributed by providing individual comments during the assemblies, these sessions demonstrated good levels of engagement, making this method significant alongside email and the questionnaire.



**Figure 3.21 – Methods Breakdown (Attendees)**

#### 3.5.2.3 Breakdown of comments for all methods

The analysis of the comments (see Figure 3.22) found email to be most effective engagement method in terms of generating comments, accounting for 56.5% of the comments. This was then followed by the questionnaire and Local Plan Assemblies which accounted for 18.9% and 18.2% of comments, respectively. The remaining 6.4% of comments came from Co-create and Drop-in sessions.

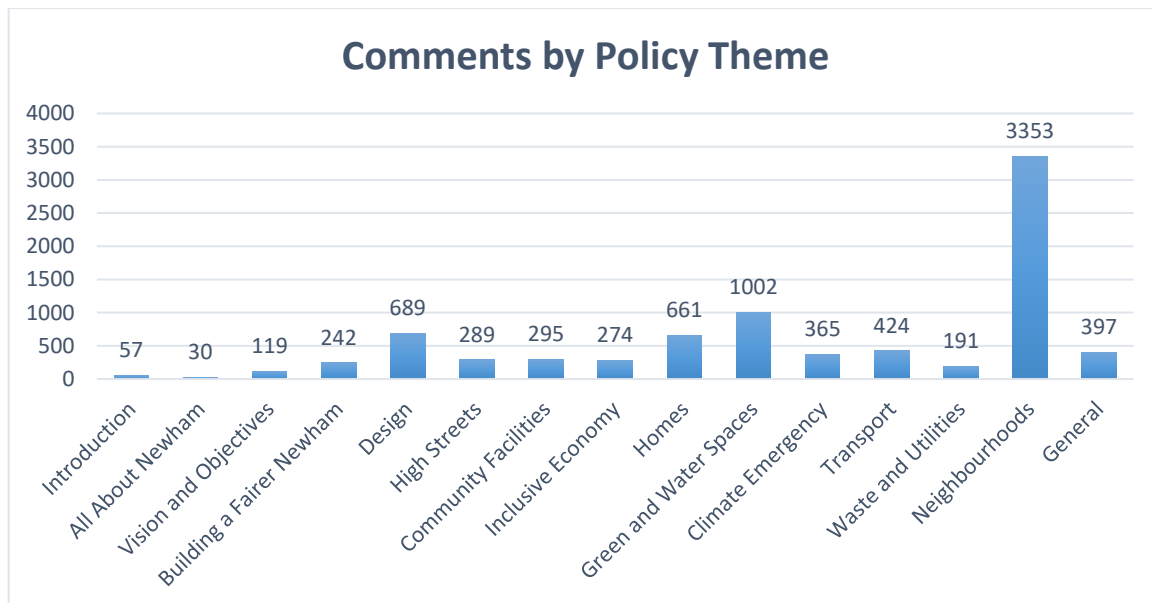


**Figure 3.22 – Methods Breakdown (Comments)**

### 3.5.3 Themes

In the process of collating the 325 representations, we broke down the representations into comments and categorised these comments according to the chapters of the Draft Local Plan. Comments made that had no direct policy link were collated into the General theme, which included general introductory remarks made by representors.

Our analysis of the comments data (see Figure 3.23) revealed Neighbourhoods to be the policy theme which elicited the most responses, with 3353 comments, followed by Green and Water Spaces with 1002 comments and Design with 689 comments.



**Figure 3.23 – Comments according to policy theme**

### 3.5.4 Demographics

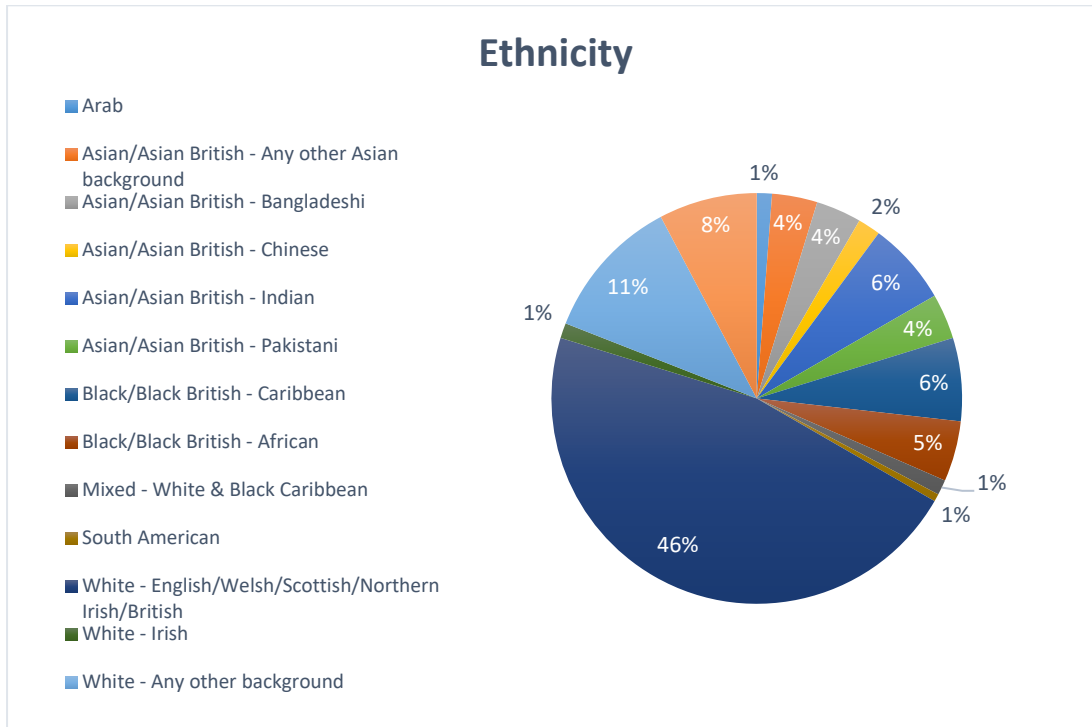
The following charts (see Figures 3.24, 3.25, 3.26, 3.27, 3.28, 3.29 & 3.30) illustrate the demographic analysis of the respondents according to their ethnicity, employment status, sexuality, faith, age, gender and disability. It is important to note we do not collect data for all of the protected characteristics, as some not relevant for peoples' engagement in the consultation.

Out of the total 325 representors and an estimated 335 attendees of the in-person events, only 168 provided some level of demographic information, as it was not a mandatory requirement. Therefore, the findings cannot be deemed fully representative of all representors.

Efforts were made to close the representation gap from the previous consultations, leading to improvements in the representation of groups who were underrepresented in the previous consultation. The analysis below will detail where these improvements were made. Despite these improvements, the findings from the regulation 18 consultation have pinpointed disparities between the characteristics of respondents and the population of Newham, according to the Census data 2021. This information will guide improvements in the next round of consultation, aiming for a more representative demographic profile.

### 3.5.4.1 Ethnicity

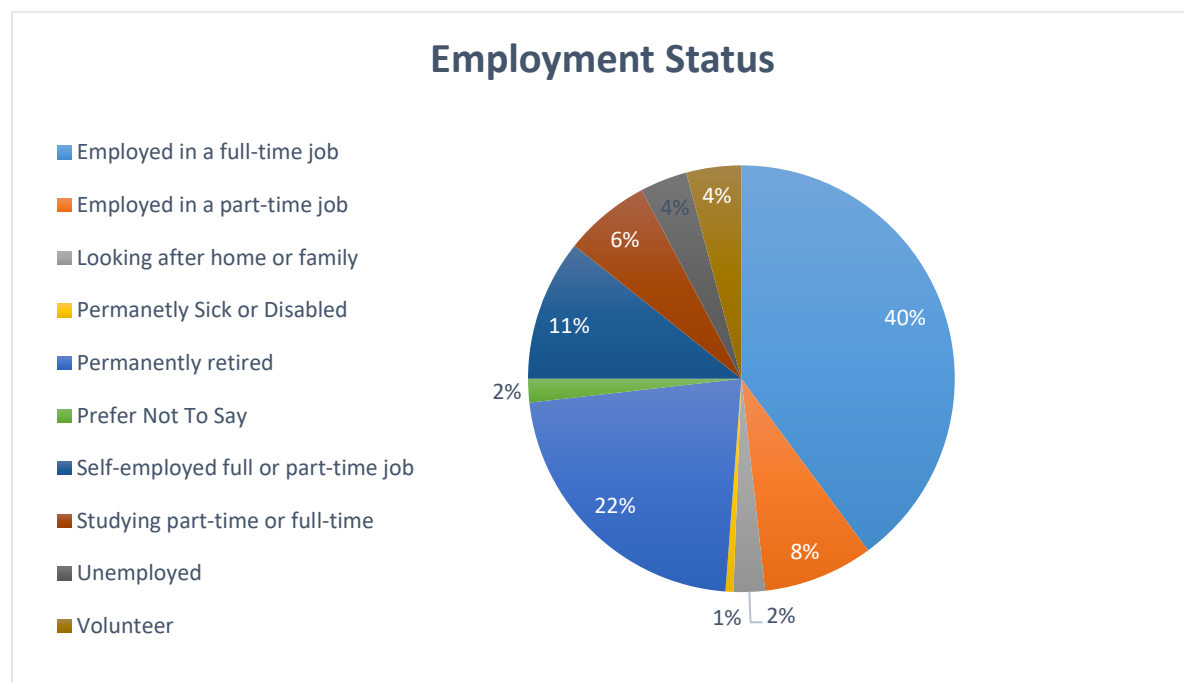
The analysis of the demographic data has identified gaps in the ethnicities of representors in comparison with Newham's population. The data indicated that Asian residents, constituting 42.2% of the population, only accounted for 20% of respondents. Similarly, Black residents, making up 17.5% of population, comprised only 11% of respondents. Conversely, white residents were overrepresented, accounting for 58% of respondents despite representing just 30.8% of the population. However, despite these disparities, there was an improvement from the previous stage of consultation. At the Issues and Options consultation stage, Asian residents represented just 18.2% respondents, and Black residents only accounted for 13.64%.



**Figure 3.24 – Ethnicity**

### 3.5.4.2 Employment Status

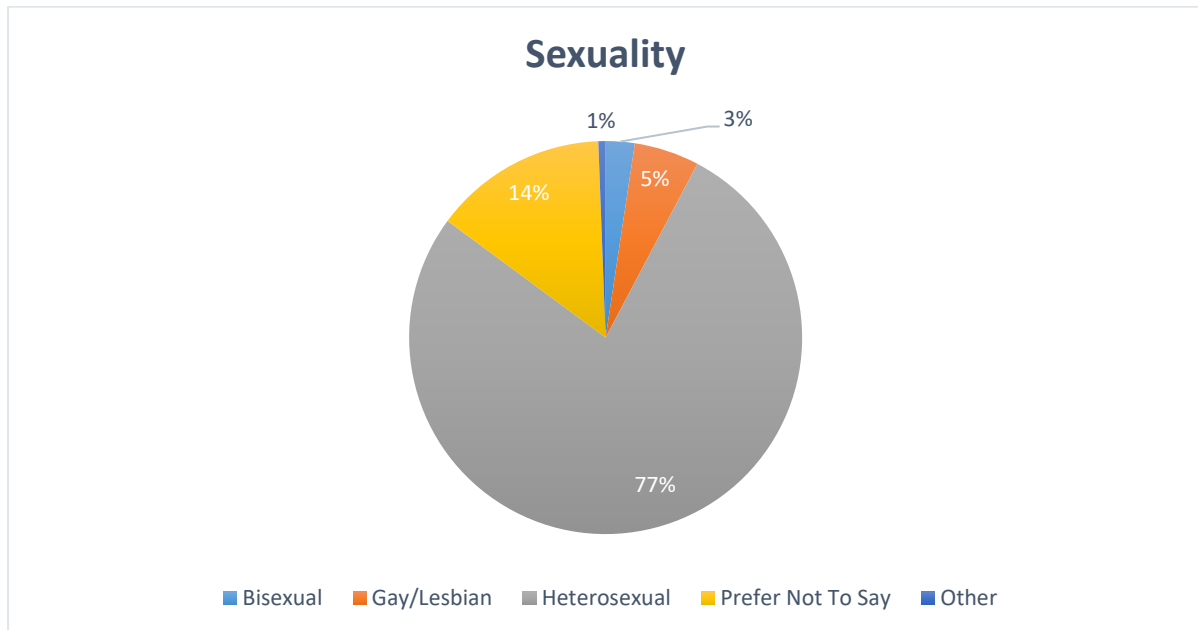
The analysis of demographic data revealed a slight underrepresentation of unemployed individuals, accounting for only 2% of the representors, despite comprising 5% of the population. Similarly, those in full and part time employment were also underrepresented, making up 48% of respondents compared to the 56% of the employed population. However, there was an improvement on the previous stage of consultation, where full and part-time employed residents only constituted 33.33% of respondents. The representativeness of this data is limited however, as only half of those who completed the demographic survey didn't answer this question or preferred not to say.



**Figure 3.25 – Employment Status**

### 3.5.4.3 Sexuality

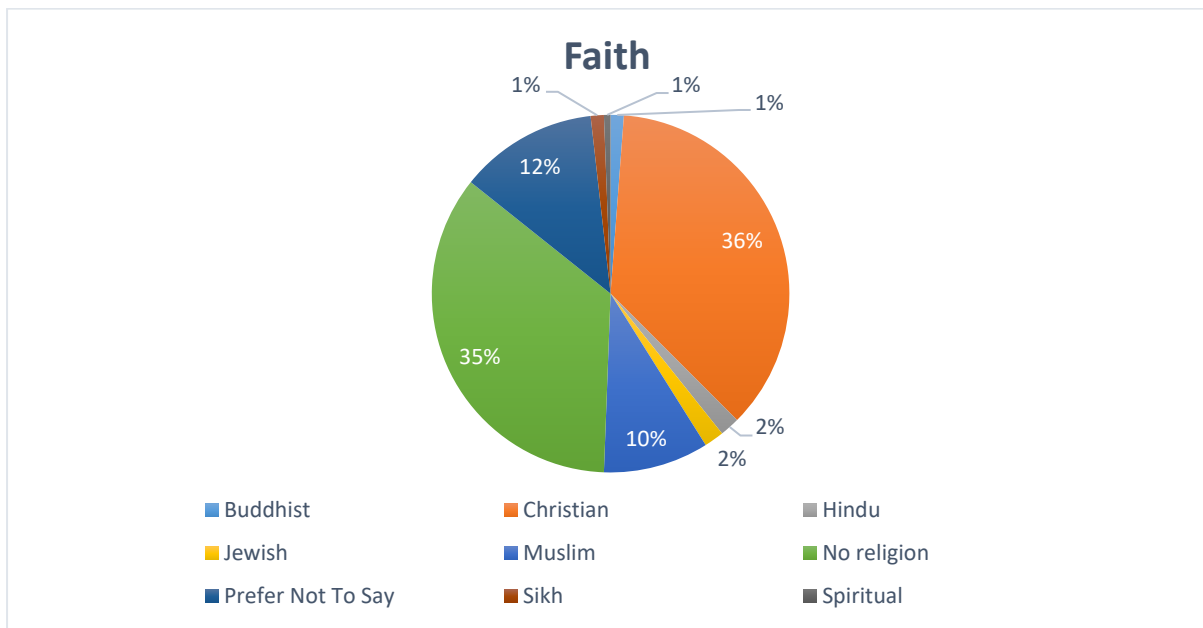
Our demographic analysis has highlighted an underrepresentation of individuals identifying as Gay/Lesbian, Bisexual, and other in the Regulation 18 consultation, comprising only 4% of the representors despite accounting for 8.33% of Newham's population. While this marks an improvement from the previous consultation where this group made up just 2.56%, there is still room for improvement. Notably, the increase in representation may be attributed to a reduction in those preferring not to answer this question, which was 58% of respondents in the Issues and Options consultation and decreased to 14% in the Regulation 18 consultation.



**Figure 3.26 – Sexuality**

#### 3.5.4.4 Faith

The equalities data has revealed gaps in the representation of people of different faiths in the Regulation 18 consultation. Only 12% of the representors identified as Muslim, despite accounting for 34.8% of the population. Likewise, 35.3% of representors identified as Christian, compared to the 47% Christian population in Newham. Additionally, respondents with no religion were overrepresented, making up 35% of representors, while constituting only 14.5% of Newham's population. Although there has been an improvement from the previous stage of consultation where Muslim residents made up only 3.42% of respondents and Christian residents accounted for 17.09%, further efforts are needed. Additionally, the level of representation may have been impacted by nearly half of the respondents who completed the demographic survey didn't answer this question or preferred not to say.

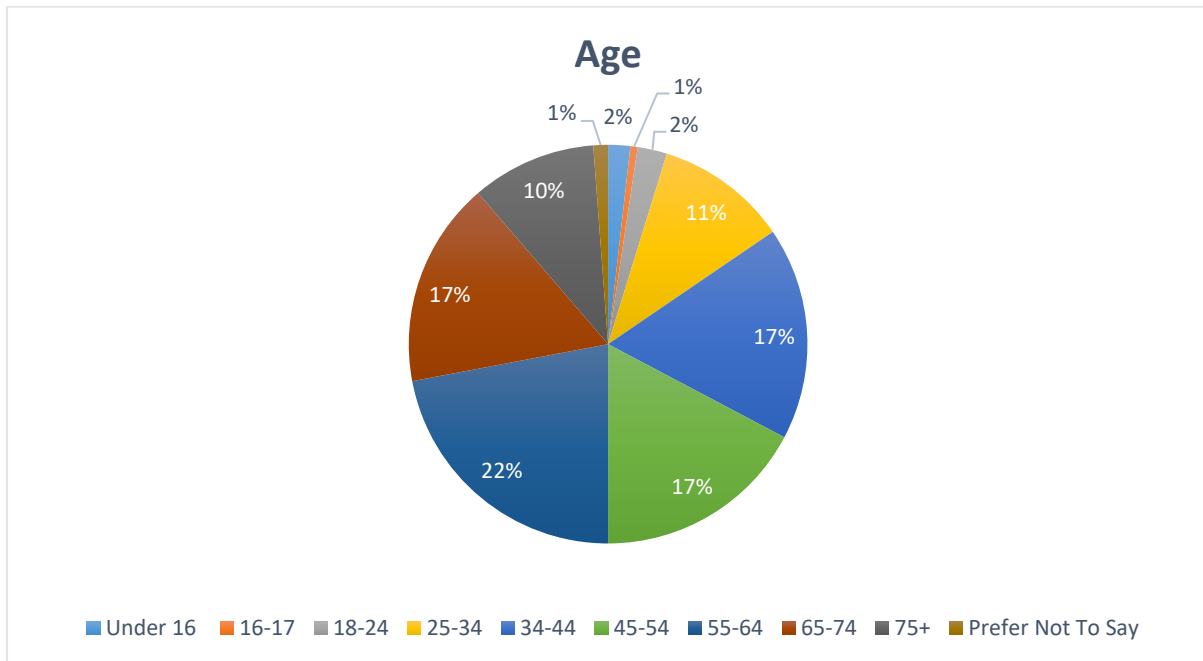


**Figure 3.27 – Faith**



### 3.5.4.5 Age

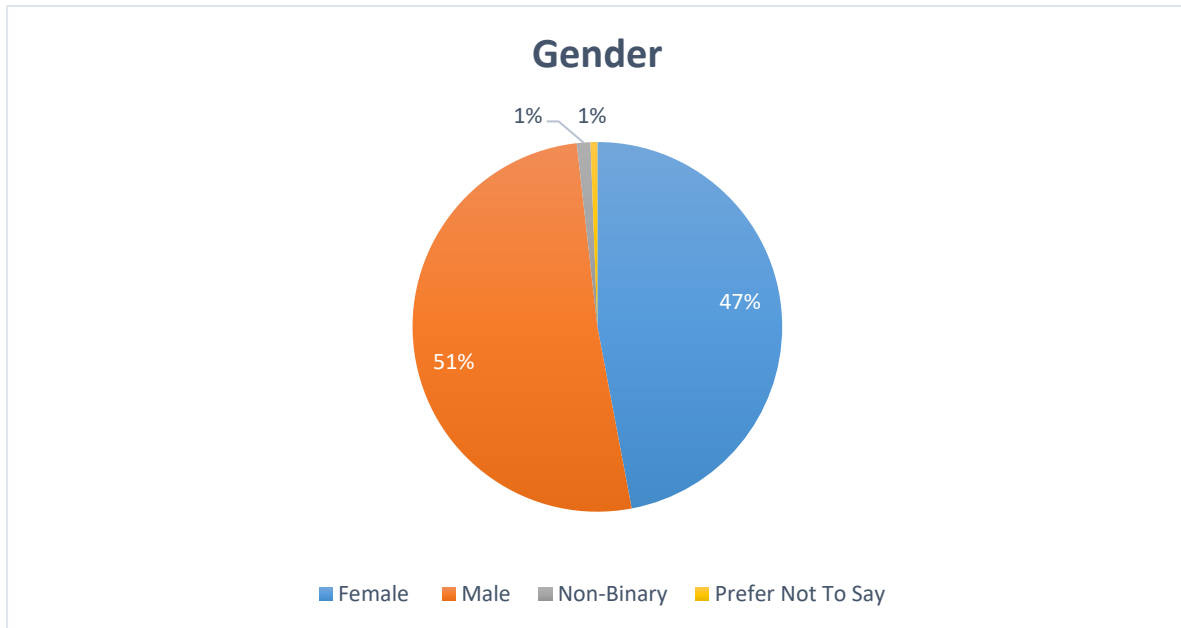
The analysis of demographic data unveiled a gap in the representation of young people in the consultation. While 13.2% of Newham's population were aged between 16-24, this group accounted for only 3% of representors. Conversely, there was an overrepresentation of over 65s, accounting for 27% of representors despite only accounting for 7.1% of Newham's population. Although, significant efforts were made to engage young people at the issues and options and Regulation 18 stages, most notably from the work with the Young Commissioners. These showed as under 16s engagement increased from 1% in the Issues and Options stage to 2% of representors at regulation 18.



**Figure 3.28 – Age**

### 3.5.4.6 Gender

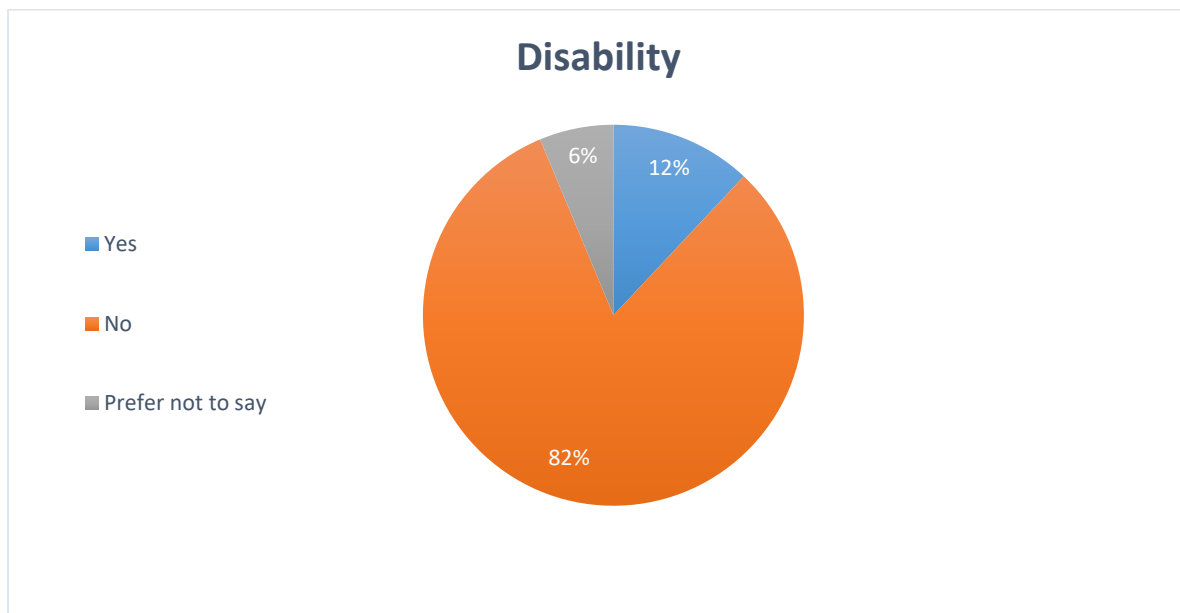
The analysis of the demographic data found a balanced gender representation among residents, with 51% identifying as male and 47% as female. This closely aligns with the population distributed in Newham, where gender demographics were 49.9% Male to 50.1% Female. While the representation of binary genders is quite accurate, there is a notable overrepresentation of non-binary respondents at 1%, compared to the 0.06% reported in the Census 2021 for Newham. This discrepancy may be attributed to the small sample size. Additionally, 1% of respondents preferred not to disclose their gender, contributing to the slight variation from Newham's population distribution. Nonetheless, this represents an improvement compared to the previous consultation, where males made up only 43% of respondents.



**Figure 3.29 – Gender**

### 3.5.4.7 Disability

The analysis of the disability data has found disabled people were underrepresented in the Regulation 18 consultation. The data revealed 12% of participants identify themselves as disabled compared to the 17.5% of Newham's population who identify themselves as disabled. In comparison, the representation of people who are not disabled was wholly representative, with 82% of participants matching the percentage of the population who are not disabled. However, the underrepresentation of those identifying themselves as disabled may be partially due to 6% of participants preferring not to say.



**Figure 3.30 – Disability**

## 3.6 Schedules 1-7

### Schedule 1: Co-create Email

**Get involved in shaping the future of Newham through the Local Plan Review.**

We are contacting you to let you know that the second round of consultation (Regulation 18) for the **Newham Local Plan Review** has formally begun and we want to hear your opinion.

During the Issues & Options Consultation in 2021, you told us what was important to you and what changes you wanted. We have written updated policies based on your responses, and now you can provide further feedback on the Draft Local Plan.

**For all of you that provided responses during the Issues and Options consultation, please see a summary of your response in the [Consultation Report](#).**

The Newham Local Plan is the **key planning document** which the Council uses to assess planning applications and to manage where regeneration and development happen in Newham, what it is used for, and what it looks like.

The Local Plan includes policies on **housing, employment, climate, greenspaces, town centres, design, community facilities, and transport**. As part of developing a new Local Plan, the Council is proposing changes to your neighbourhood through 16 context-specific neighbourhood policies with proposed uses for site allocations.

**Have your say!**

There are lots of different ways to be involved. Visit [Newham Co-Create](#) where you will be able to:

- **Read** the Draft Newham Local Plan.
- **Submit comments** and feedback.
- Sign-up to our online and in-person [events](#).

Alternatively, **hard copies** of the Draft Newham Local Plan and response form can be found at all local libraries.

We want to give everyone the opportunity to have a say on the Newham Local Plan Review. Please contact us for any queries via email to [localplan@newham.gov.uk](mailto:localplan@newham.gov.uk), by post to Newham Dockside, 1000 Dockside Road, E16 2QU.

**Have your say before 20 February 2023.**

# Newham Recorder

**ALPHABET CARS**  
24 HOUR MINI CABS  
020  
**8503 5555**  
BOOK & TRACK  
DOWNLOAD OUR APP  
020 8503 5555 | www.alphabet-cars.com

newhamrecorder.co.uk

February 8, 2023

FREE

**Have your say  
on extension  
proposal**



Page  
3

## Doctor worked shifts while on sick leave

Medic who also worked overlapping shifts 'had potential to compromise patient safety' and has been suspended for six months

Page  
5

**UP TO 50% OFF  
ADJUSTABLE BED  
SALE\***



Get your **FREE**  
Brochure Pack  
**NOW!**

**0800 68 99 724**  
[www.adjustable-beds.uk](http://www.adjustable-beds.uk)

\*Terms and conditions apply. See website for more details.



**ADJUSTAMATIC**  
COMFORT YOU CONTROL





## Schedule 3: Newham Mag



# WE ARE PLANNING.



**PLANNING FOR THE FUTURE OF NEWHAM: HAVE YOUR SAY**  
WE WANT YOUR VIEWS ON HOW NEWHAM SHOULD BE DEVELOPED OVER THE NEXT 15 YEARS THROUGH OUR LOCAL PLAN CONSULTATION. SO HAVE YOUR SAY AND HELP US SHAPE OUR PLANNING POLICIES FOR THE BOROUGH.

**The Local Plan decides where homes, shops, health centres and much more will be built across the borough, as well as setting out:**

- The location, amount and type of development in the borough.
- The standards that development should meet.
- What development should look like.
- What services and infrastructure are needed and where.
- How all residents will benefit from the growth and development.

Mayor Fiaz said: "It is vital such plans about the future of our borough are made with residents at the heart of decision making. I want to make sure our plans for the next 15 years are truly people powered.

"Residents know best what it is like to live, grow up and work in Newham, which is why the Local Plan Review needs their expertise on the issues that are important and their ideas on how to solve them."

To take part in the consultation visit [www.newhamco-create.co.uk](http://www.newhamco-create.co.uk) Queries can also be made via email to [localplan@newham.gov.uk](mailto:localplan@newham.gov.uk) or by post to: Local Plan

Review, Newham Dockside, 1000 Dockside Road, E16 2QU.

This is the second stage of consultation, following resident feedback in 2021 which led to new policies being drafted.



## Schedule 4: Public Notice

## Start thinking about future

As we celebrate the beginning of a new year, it is traditional to pause and take stock of the past. It is also a good opportunity to look ahead and plan for the future.

If you are expected to Year 11, it may seem like you are just finishing the year. When making decisions about your next steps, it is really important to think about how the choices you make will affect your future.

It is also important to think about your career options. If you are expected to Year 11, you may be asked to think about your career options. It is really important to think about how the choices you make will affect your future.

If you are struggling to decide which career path to take, it is really important to think about how the choices you make will affect your future. It is really important to think about how the choices you make will affect your future.

Afterwards, you will meet with the careers and guidance team. They will be happy to provide free and impartial careers advice and guidance.

NewVic principal Mandeep Gill has advice for students leaving school this year and encourages them to think about their future options.

If you have not done so already, make sure you take every opportunity to visit other organisations. You may even be asked to think about your future options.

If you are struggling to decide which career path to take, it is really important to think about how the choices you make will affect your future. It is really important to think about how the choices you make will affect your future.

Afterwards, you will meet with the careers and guidance team. They will be happy to provide free and impartial careers advice and guidance.

Afterwards, you will meet with the careers and guidance team. They will be happy to provide free and impartial careers advice and guidance.



Year 11 students should visit open days like those held at NewVic. Picture: NewVic

## Cricket welcomes refugees

WELCOME to my first column of the new year.

One of the greatest joys of being a cricket writer is to meet the players and see them in action. It is a great opportunity to see the players in action and see them in action.

One of the greatest joys of being a cricket writer is to meet the players and see them in action. It is a great opportunity to see the players in action and see them in action.

One of the greatest joys of being a cricket writer is to meet the players and see them in action. It is a great opportunity to see the players in action and see them in action.

One of the greatest joys of being a cricket writer is to meet the players and see them in action. It is a great opportunity to see the players in action and see them in action.

City of London Corporation's Open Spaces and West Ham Park Committee chair, Caroline Haines, reveals what visitors to West Ham Park can look forward to and get involved with in 2023.

One of the greatest joys of being a cricket writer is to meet the players and see them in action. It is a great opportunity to see the players in action and see them in action.

One of the greatest joys of being a cricket writer is to meet the players and see them in action. It is a great opportunity to see the players in action and see them in action.

One of the greatest joys of being a cricket writer is to meet the players and see them in action. It is a great opportunity to see the players in action and see them in action.

One of the greatest joys of being a cricket writer is to meet the players and see them in action. It is a great opportunity to see the players in action and see them in action.



West Ham Park welcomes 2023. Picture: ELIE HORMIER

## FOOD FOR THOUGHT FOR YOUR BUSINESS WITH ZOOM-IN LEAFLET SOLUTIONS



Find out more at [zoominleaflets.co.uk](https://zoominleaflets.co.uk)  
t: 0845 1999 830  
e: [localsales@zoominleaflets.co.uk](mailto:localsales@zoominleaflets.co.uk)

Find out more at [zoominleaflets.co.uk](https://zoominleaflets.co.uk)  
t: 0845 1999 830  
e: [localsales@zoominleaflets.co.uk](mailto:localsales@zoominleaflets.co.uk)



### Newham Local Plan Review- Notice of Engagement

The London Borough of Newham is refreshing the adopted Newham Local Plan (2018) so we can plan for the next 15 years and deliver our key objectives: inclusive growth, building a fairer Newham, and addressing our climate emergency.

The Local Plan is the key planning document that the Council uses to assess planning applications, and to manage where regeneration and development happen in Newham, what it is used for and what it looks like.

Through this refresh, the Council is also including the part of the borough where the London Legacy Development Corporation (LLDC) currently develops planning policy and makes decisions on planning applications. Planning powers for this area will be handed back to boroughs by the end of 2024. The Council is working with the LLDC and other partners so that this new Local Plan can include policies for the whole borough, in time for the handover date.

The Draft Newham Local Plan has been published to allow comments to be made prior to developing the Submission Local Plan. The Plan has considered and included all the

feedback from residents obtained during the Issues and Options consultation in Autumn 2021, alongside findings from up to date evidence base documents. Comments can be submitted until 20<sup>th</sup> February 2023.

Visit [newhamco-crea.co.uk/en/folders/newham-local-plan-review](https://newhamco-crea.co.uk/en/folders/newham-local-plan-review) to find details of the consultation events and submit comments. Comments can also be sent by email to [localplan@newham.gov.uk](mailto:localplan@newham.gov.uk), by post to Newham Dockside, 1000 Dockside Road, E16 2QU. Paper copies of the Draft Newham Local Plan can be found at all local libraries during normal opening hours.

If you want to be kept updated on the Local Plan Review, sign up to the Local Plan mailing list via [www.newham.gov.uk/localplan](https://www.newham.gov.uk/localplan) or email [localplan@newham.gov.uk](mailto:localplan@newham.gov.uk) or call 0208 430 2000 for any additional queries.





WE ARE NEWHAM.

WE ARE SHAPING.

OUR LOCAL PLAN.

Get involved in shaping the future of Newham through the Local Plan Review.

The Local Plan is the key planning document the Council uses to assess planning applications and manage where regeneration and development will take place in Newham over the next 15 years.

At the end of last year we held our first consultation and you told us what was important to you about housing, community facilities, high streets, our local environment and tackling the climate emergency, and how you wanted Newham to change. We have listened to your feedback and written new policies based on your responses. Now you can provide further feedback on the Draft Local Plan.



BUILDING A  
FAIRER  
NEWHAM

WE ARE NEWHAM.

#### How can I get involved?



##### Online

Use the QR code to visit Co-Create and read and comment on the Draft Local Plan.



##### At our libraries

Read the Draft Local Plan at all local libraries and provide feedback through the printed questionnaire.



##### Come to one of our events

Come to one of the following events to find out more and provide your feedback.

You can also get in touch with us to provide your comments via email at [localplan@newham.gov.uk](mailto:localplan@newham.gov.uk), by post to **Newham Dockside, 1000 Dockside Road, E16 2QU**, or by phone on **0208 430 2000**.

Use the QR code to find more information and in different languages.



مختلف زبانوں میں لوکل پلان کے متعلق مزید جاننے کے لیے براہ کرم QR کوڈ مسکن کیجیے۔

Δυσκολίες διαβάσεως ή αλφβήτου? Επισκεφθείτε το [www.newham.gov.uk](http://www.newham.gov.uk) ή καλέστε το 0208 430 2000.

Vă rugăm să scanați codul QR pentru a afla mai multe informații despre Local Plan (Planul local) în diferite limbi.

বিভিন্ন ভাষায় স্থানীয় প্রাণে সম্পর্কে জানতে অনুগ্রহ করে QR কোডটি স্ক্যান করুন।

رود مسکن کوڈ الاستعلامية السريعة مسكنة لمعرفة المزيد عن الخطة المحلية وإحداثياتها في مختلف.

Event	Dates	Location and Address
Local Plan Online Event	Monday 16 January 6.30 - 7.30pm	Online – use the QR code to register on Co-Create for more details
Forest Gate and Maryland Local Plan Assembly	Thursday 19 January 6.30 - 8pm	Forest Gate Learning Zone 1 Woodford Road E7 0DH
Custom House and Canning Town Local Plan Assembly	Tuesday 24 January 6.30 - 8pm	Custom House and Canning Town Neighbourhood Centre 18 Rathbone Market E16 1 EH
Manor Park Local Plan Assembly	Thursday 26 January 6 - 7.30pm	Jack Cornwell Community Centre Jack Cornwell Street E12 5NN
Local Plan Drop-In Session	Saturday 28 January 11am - 1pm	East Ham Library 328 Barking Road E6 2RT
Beckton and Royal Docks Local Plan Assembly	Tuesday 31 January 6.30 - 8pm	Royal Docks Learning & Activity Centre Albert Road E16 2JB
Plaistow Local Plan Assembly	Thursday 2 February 6 - 7.30pm	Plaistow Library North Street E13 9HL
Green Street Local Plan Assembly	Monday 6 February 6.30 - 8pm	Katherine Road Community Centre 254 Katherine Road E7 8PN
Stratford and West Ham Local Plan Assembly	Wednesday 8 February 6.30 - 8pm	Hopkins Room, Stratford Library 3 The Grove E15 1EL
East Ham Local Plan Assembly	Thursday 9 February 6 - 7.30pm	East Ham Library 328 Barking Road E6 2RT

Have your say before 20 February 2023

#NewhamLocalPlan

BUILDING A  
FAIRER  
NEWHAM



## Schedule 6: List of representors (excluding residents)

Statutory Consultees	<ul style="list-style-type: none"> <li>• Barking and Dagenham Council</li> <li>• City of London</li> <li>• Department for Education</li> <li>• Environment Agency</li> <li>• Greater London Authority</li> <li>• Historic England</li> <li>• LB Redbridge</li> <li>• LB Waltham Forest</li> <li>• LLDC</li> <li>• Marine Management Organisation</li> <li>• Metropolitan Police Service</li> <li>• National Grid</li> <li>• National Highways</li> <li>• Natural England</li> <li>• NHS North East London</li> <li>• Port of London Authority</li> <li>• Sport England</li> <li>• Thames Water</li> <li>• The Coal Authority</li> <li>• Theatre Trust</li> <li>• Transport for London</li> <li>• Woodland Trust</li> </ul>
Community Groups' Representatives	<ul style="list-style-type: none"> <li>• Anjumnan E Islahul Muslimeen (London) Uk Trust Ltd</li> <li>• Climate You Change</li> <li>• Eco7</li> <li>• Friends of Queens Market</li> <li>• Friends of West Ham Park</li> <li>• Green Street Traders Association</li> <li>• Manor Park Pop Up Market</li> <li>• Newham Cyclists</li> <li>• Newham Homelessness Forum</li> <li>• Newham New Deal Partnership</li> <li>• One Newham</li> <li>• Plashet Park</li> <li>• River Roding Trust</li> <li>• Shelter</li> <li>• Surge Cooperative Limited</li> <li>• Swifts Local Network</li> <li>• West Silvertown Foundation</li> </ul>
Developers/Landowners	<ul style="list-style-type: none"> <li>• Abrdn</li> <li>• Albert Island Regeneration Limited</li> <li>• Anchor</li> <li>• Aston Mansfield</li> <li>• Ballymore Group</li> <li>• Ballymore</li> <li>• Barratt London</li> </ul>

	<ul style="list-style-type: none"> <li>• Beekton Alp Real Estate Ltd</li> <li>• Bellway Homes Limited</li> <li>• Berkeley Homes Limited</li> <li>• Caxton Street North Limited</li> <li>• DB Cargo (UK) Ltd</li> <li>• D P K Management</li> <li>• Finebeam Ltd</li> <li>• GLP</li> <li>• Hadley Property Group</li> <li>• Hagley Ltd</li> <li>• Hollybrook Homes</li> <li>• IQL South</li> <li>• IXDS Ltd</li> <li>• IXO LLP</li> <li>• LAMIT c/CCLA Investment Management Ltd</li> <li>• Landhold Developments Ltd</li> <li>• L&amp;Q</li> <li>• LCR</li> <li>• Lidl</li> <li>• London City Airport</li> <li>• London Markaz Abbey Mills Trust Land</li> <li>• Millenium Group</li> <li>• Network Rail</li> <li>• Newham 6<sup>th</sup> Form College</li> <li>• Notting Hill Genesis</li> <li>• Poplar HARCA</li> <li>• Redefine Hotels Portfolio IV Ltd</li> <li>• Royal Docks Team</li> <li>• Sainsbury's Supermarkets Ltd</li> <li>• SEGRO Plc</li> <li>• Silvertown Homes Ltd</li> <li>• Stratford City Business District Limited</li> <li>• Stratford East London Partners LLP</li> <li>• St Williams Homes LLP</li> <li>• Tate &amp; Lyle Sugars</li> <li>• Transport Trading Limited Properties Limited</li> <li>• Vasint BV</li> <li>• Unibail-Rodamco-Westfield</li> <li>• Unite Group Plc</li> <li>• University College London</li> <li>• University of East London</li> <li>• UrBox Beckton Limited</li> <li>• Watkins Jones Group Plc</li> <li>• Wm Morrison Supermarkets Ltd</li> <li>• Zirconia Stratford Unit Trust</li> </ul>
Elected Officials	<ul style="list-style-type: none"> <li>• Councillor Anamul Islam – Forest Gate</li> <li>• Councillor Areeq Chowdhury – Beckton</li> <li>• Councillor Carolyn Corben - Maryland</li> <li>• Councillor James Beckles – Custom House</li> <li>• Councillor Madeleine Sarley Pontin – Forest Gate</li> <li>• Councillor Susan Masters – East Ham</li> <li>• Stephen Timms MP – East Ham</li> </ul>

## Schedule 7: Comments and responses Tables

The [comments and responses tables](#) have been provided alongside this consultation report, broken down by chapters of the Local Plan. These tables display all of the comments submitted as part of the Local Plan consultation and our responses.

Please note, a number of representation responses refer to the delivery of 15 minute neighbourhoods or 15 minute neighbourhood principles or 15 minute neighbourhood concept. The intention behind this objective is to ensure that all residents can live within a 15 minute walk of key facilities such as shops, schools, parks and workspaces. This is so that residents do not have to travel so far to reach these essential services. Residents are of course welcome to travel further afield to reach a wider range of facilities. To better reflect the intentions behind this objective, this principle is now referred to as a network of well-connected neighbourhoods, in the Local Plan.

## Appendix 2: Regulation 19 - Consultation overview, methods, processes and evidence

### 3.7 Summary of responses

Table 3 below details the main issues identified for each policy theme during the Regulation 19 consultation and provides the Council's response. It also indicates whether these comments have been proposed as modifications to the Inspector(s) at examination.

The full tables of comments and our responses can be found [here](#).

Themes and Policies	Key issues raised	Our response (modifications are shown with the <del>old text struck through</del> and <b>new text in bold</b> )
<b>General</b>		
<b>Consultation</b>	<p><b>The Design and Accessibility of the plan for residents</b></p> <p>A number of residents found the Local Plan and response documents difficult to engage with due volume of information and planning language being too complex.</p> <p><b>Inclusion of marginalised communities and digitally excluded groups</b></p> <p>A number of residents raised concerns regarding efforts to include marginalised communities who are less likely to engage with the consultation process.</p> <p><b>Lack of engagement with local communities, meaning the Plan doesn't comply with the Duty to Cooperate</b></p> <p>A number of residents raised concerns about a lack of engagement with local stakeholders, including community groups, community leaders, residents, and land owners. They have therefore concluded that the Plan fails to comply with the Duty to Cooperate.</p>	<p><b>The Design and Accessibility of the plan for residents</b></p> <p>The Local Plan and response forms aim to be clear and accessible while using necessary planning language, supported by summary documents and consultation events to help residents understand key changes and the Regulation 19 process.</p> <p><b>Inclusion of marginalised communities and digitally excluded</b></p> <p>The consultation included a wide range of methods to reach all of Newham's population using a combination of online and offline methods. To increase participation from previously underrepresented residents, 63 relevant community groups were identified and sent personalised emails inviting them to meetings about the Local Plan consultation. These emails included a link to the Regulation 19 guidance document and aimed to foster meaningful discussions on proposed policies. As a result, community events were held with groups such as the Inter-Faith Forum, One Newham, Stratford BID, and the Homelessness Forum, where the Local Plan and the consultation process were discussed, allowing these groups to provide feedback on policies of interest.</p> <p><b>Lack of engagement with local communities, meaning the Plan doesn't comply with the Duty to Cooperate</b></p> <p>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.</p>

	<p><b>Suggestion for a further consultation on the Local Plan following the government's extension of the submission deadline for the Local Plan</b></p> <p>A resident suggested a further consultation should be held on a number of matters raised at the consultation by this resident.</p>	<p>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, the Council has actively engaged communities through various consultation stages.</p> <p><b>A suggestion for a further consultation on the Local Plan following the government's extension of the submission deadline for the Local Plan</b></p> <p>It is a decision for Full Council whether to submit the Plan for examination or revise the Plan and hold a further consultation.</p>
<b>EQIA</b>	<p><b>Further improvements required to the EQIA</b></p> <p>One resident suggested that the EQIA is not up to the standard of the previous EQIA conducted for the 2018 Local Plan.</p> <p><b>EQIAs for planning applications</b></p> <p>One resident questioned whether it is the intention that Planning Applications that conform with the Council's policies (as all that receive consent presumably will) will also be deemed to be in accordance with the EIA and the Council's Equality Duties.</p>	<p><b>Further improvements required to the EQIA</b></p> <p>The Local Plan is a high-level strategy addressing various aspects of development, such as infrastructure, housing, and green space. However, its influence is limited, as it cannot control the operation of buildings or enforce changes outside of planning processes. 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. The Equalities Impact Assessment (EqIA) is necessarily high-level and uses data from sources like Newham's Population Surveys and the 2021 Census.</p> <p><b>EQIAs for planning applications</b></p> <p>The plan includes policies that require developers of larger sites to engage with communities and assess social value and health impacts, with ongoing monitoring for future reviews. The Council believes this approach is appropriate and meets its duties under the Equality Act.</p> <p>Equalities considerations are also integrated into the development management process. Planning applications, especially larger ones, must consider the impacts on groups with protected characteristics, and an</p>

	<p><b>EQIAs should specifically consider unique needs of different groups and ongoing monitoring and reviews</b></p> <p>Several residents suggest the Plan failed to meet equality considerations in line with the Equality Act 2010 and the Well-Being Act for both individuals and the wider community. Residents suggested Abbey Mill lacks any Muslim community social infrastructure, unlike other London boroughs, highlighting a gap in inclusive planning.</p>	<p>Environmental Statement may assess socio-economic implications. All applications include an equalities assessment to ensure compliance with the Equality Act 2010.</p> <p><b>EQIAs should specifically consider unique needs of different groups and ongoing monitoring and reviews</b></p> <p>The Local Plan is a broad strategy influencing development but has limitations beyond planning processes and landowner control. While a high-level Equalities Impact Assessment (EqIA) is required, it has been adapted using data from Newham's Population Surveys and the 2021 Census.</p> <p>The Community Facilities Needs Assessment has informed policies on social infrastructure, particularly for faith groups, including site allocations like N7.SA1 Abbey Mills. The plan also requires developers of larger sites to engage with communities (BFN2) and assess social value and health impacts (BFN3), with ongoing monitoring to inform future reviews. The Council considers this approach proportionate, appropriate, and compliant with the Equality Act.</p>
<b>Viability</b>	<p><b>In-house qualified viability assessor</b></p> <p>One resident raised that Plan does not comply with the agreement by full council to appoint an in-house qualified viability assessor.</p> <p><b>Increasing costs in the development industry stagnant residential values, and regulation reducing development viability across London</b></p> <p>Ballymore identified increasing costs in the development industry stagnant residential values, new standards and greater regulation are reducing development viability across</p>	<p><b>In-house qualified viability assessor</b></p> <p>The Local Plan policy already requires independent scrutiny of viability information and does not specify who this is undertaken by. No change in the Plan is required to enable the Council to change who undertakes this independent scrutiny or how the Council's committee processes function.</p> <p><b>Increasing costs in the development industry stagnant residential values, and regulation reducing development viability across London</b></p> <p>The viability assessment highlights challenges in meeting the policy target due to high construction costs and interest rates. However, as economic conditions improve, delivery is expected to become easier over time. The policy also allows for viability assessments where targets cannot be met,</p>

	London. This is not sufficiently considered in the draft Plan; the developer had concerns that developments may become unviable.	ensuring flexibility and deliverability. The Council is confident that the plan remains sound.
<b>Vision and Objectives</b>		
<b>Vision and Objectives</b>	<p><b>General Support</b> A broad range of consultees, including developers, statutory consultees, resident groups and the GLA supported the vision and objectives or aspects of it.</p> <p><b>Green Space Designation Boundaries</b> A developer and London City Airport highlighted errors or inconsistencies in the mapping of designated green space on their sites as shown on the key diagram. One other landowner objected to the greenspace designations on their site as shown on the key diagram.</p> <p><b>Employment Designations</b> The Port of London Authority and a developer suggested further detail was added to the key diagram or vision regarding employment uses. One developer suggested a change to the employment reference for their site.</p>	<p><b>General Support</b> Support for the vision and objectives is welcomed.</p> <p><b>Green Space Designation Boundaries</b> These two boundary errors have been noted and modifications have been drafted for the key diagram and policies map to address them, which will be presented to the Inspector for their consideration. The objection to the greenspace designation (MOL) has not resulted in a change as the key diagram is illustrative of Newham's existing green space, including green space which is not publicly accessible. Lady Trowers Playing Fields is designated as a green space, it is Metropolitan Open Land and is a Site of Importance for Nature Conservation.</p> <p><b>Employment Designations</b> No changes have been made as a result of these representations as it is considered that sufficient and accurate detail is provided in the key diagram and vision regarding employment uses; with further detail, on safeguarded wharves and employment uses, provided in other more detailed parts of the Plan. The employment designations referenced in the vision are sufficiently justified by evidence in the Employment Land Review.</p>
<b>Building a Fairer Newham</b>		
<b>BFN1: Spatial Strategy</b>	<b>General Support</b>	<b>General Support</b> Support for the policy is welcomed.



	<p>This policy and spatial strategy was broadly supported by developers, duty to cooperate partners and statutory consultees.</p> <p><b>Meanwhile uses</b></p> <p>Hadley and the Royal Docks Team were broadly supportive of the new meanwhile policy but suggested that meanwhile uses should be allowed for periods of up to 10 years and that this should be renewable. The Royal Docks Team also provided comments on this point in relation to BFN2. In addition, one developer, Hadley, considered that the BREEAM requirement was too onerous.</p>	<p><b>Meanwhile uses</b></p> <p>A change to the policy approach regarding the length of time for meanwhile uses, has not been made as the policy is already considered flexible enough to be effective. The policy enables longer meanwhile uses (beyond 5 years) where they accord with the Plan's spatial strategy, in particular policies which support the vitality and viability of town centres and employment designations. Allowing meanwhile uses which would not comply with these policies for longer than 5 years risks undermining the delivery of the Plan's key objectives. The Council is satisfied that the plan remains sound without the proposed changes.</p> <p>In relation to environmental standards, the Council's objective for this policy approach is to ensure that all development, including meanwhile development, in the borough is of high quality and makes a contribution to tackling the climate emergency. However, the Council recognises the importance of ensuring the Plan is flexible enough to be deliverable and that there may be circumstances where BREEAM excellent may not be feasible and therefore drafted the following modification, which will be presented to the examiner for their consideration, to the implementation text for policy BFN1.8:</p> <p>BFN 1.8 Meanwhile uses must also comply with the Plan's commitment to tackling the climate emergency, meet BREEAM excellent, <b>as and where applicable to the proposed use</b>, and consider how temporary new builds can reduce their environmental footprint via Modern Methods of Construction and the potential for reuse of temporary new builds in other locations. <b>An exception to the requirement to meet BREEAM excellent may be made for temporary structures seeking permission for a shorter time</b></p>
--	---	---

	<p><b>Delivery of Infrastructure</b> One developer, St William, suggested that wording should be changed to indicate that school and leisure provision delivery should be subject to a needs based assessment at the time of delivery. The Royal Docks team highlighted an inconsistency with the health centre requirements on Thameside West and the permitted scheme.</p> <p><b>Open space requirements</b> A developer, St William, and a landowner, Aston Mansfield, supported the approach to delivering new open space and providing public access to open space on site allocations but requested removal of the reference to Metropolitan Open Space on their site (N13.SA3) and reference to providing recreational facilities on their site, Lady Trowers Playing Fields. The Royal Docks Team repeated their comments from Regulation 18 that there should be greater flexibility on the open space requirements, suggesting there is insufficient evidence to proscribe the type and scale of open space. One residents group argued there should be greater protection for open space.</p>	<p><b>period. Where this is allowed, extensions in time are unlikely to be granted to avoid long term poor quality development.</b> Further flexibility regarding design standards has also been proposed within policy D1.</p> <p><b>Delivery of Infrastructure</b> A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan is applied in the round and policies in the Strategic Infrastructure chapter indicate the requirement for a needs based assessment at the time of delivery for the delivery of infrastructure on site allocations. The health requirements have been informed by engagement with North East London ICB but policy SI2 also enables flexibility by allowing for the provision of health contributions where onsite provision is not required. The Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>Open space requirements</b> Changes to the policy approach on open space designations and delivery requirements have not been made as they are supported by a range of evidence base documents, including the Green and Water Infrastructure Study, the Playing Pitch Strategy and the MOL review. They are considered to strike the right balance between meeting Newham's significant needs for new open space and deliverability. The Council is satisfied that the plan remains sound without the proposed changes.</p>
--	--	--

	<p><b>Employment references</b> Developers requested a number of changes related to referencing employment uses, including data centres, on certain site allocations.</p> <p><b>Optimising housing delivery</b> A developer, a landowner and the Home Builders Federation raised that it would be useful for the Plan to include more detail on indicative housing numbers and to expressly support the delivery of homes within 800m of a train station or boundary of a town centre or within PTALs 3-6 will be considered appropriate locations for residential development</p>	<p><b>Employment references</b> These changes were not made as the level of detail in the policy is considered suitable for a strategic policy and the allocation requirements align with the employment policies and Employment Land Review evidence base. However a change has been proposed to the glossary and J1 to clarify the definition of employment-led.</p> <p><b>Optimising housing delivery</b> A change to this policy approach has not been made. We did not consider this change to be necessary as the approach is justified. The site allocations include design principles for how sites should be optimised for housing as well as requirements for different types of use. In addition, in conformity with the London Plan 2021, policies BFN1.1 and BFN1.2, D3 and H1, supported by the neighbourhood policies and site allocations, ensures that housing delivery in sustainable locations, where not required for other priority uses, is supported in the Plan. Figures for particular areas are only provided which reflect work undertaken by the GLA through the development of Opportunity Area Planning Frameworks. Otherwise figures are provided in the Site Allocation and Housing Trajectory Methodology paper, which can be updated more regularly than the Local Plan. The Council is satisfied that the plan is sound without the proposed changes.</p>
<b>BFN2: Co-designed masterplanning</b>	<p><b>General Support</b> This policy was supported by some developers and landowners, the Environment Agency, Sports England and Transport for London</p> <p><b>Post Occupancy Surveys</b> The Home Builders Federation questioned the purpose and value of post occupancy surveys. A number of developers and the Royal Docks Team broadly supported them but</p>	<p><b>General Support</b> Support for the policy is welcomed.</p> <p><b>Post Occupancy Surveys</b> A significant change to this policy has not been made as we continue to consider post occupancy surveys to be a useful tool in monitoring how successful the Plan has been at delivering its objectives and the</p>

	<p>wanted further detail on what they would include and what the participation rate should be.</p> <p><b>Definition, explanation and inclusion of, co-design</b> There was broad support for the requirement to undertake co-designed masterplanning from the Royal Docks Team, one developer and a landowner, it was requested that further detail be provided on what would constitute co-design. One resident wanted greater resident participation in planning.</p> <p><b>Meanwhile uses</b> Three developers queried the need and applicability for a meanwhile strategy on all phased sites. One residents group suggested that the requirement should be extended to sites vacant for a year or more.</p>	<p>implementation text already provides an explanation of their purpose and delivery and includes a commitment for the Council to develop a series of standard questions. We note there are a number of existing guidance documents, including by RIBA and the GLA which will be used to inform this list.</p> <p>However, the Council recognises that the proposed response rate may not be possible in all circumstances and indeed that some developments may require a larger sample size to ensure statistical significance. As such the following wording change is proposed: Surveys should be completed more than 12 months and less than 24 months after full occupancy of the phase. It is expected that the survey should be conducted by an independent third party and <b>achieve a proportionate response rate</b> <del>have a response rate of at least 40 per cent</del> to ensure sufficient data quality and anonymity.</p> <p>This is included in the modification table.</p> <p><b>Definition, explanation and inclusion of, co-design</b> A change to the approach was not made as we did not consider that the additional of further detail or definition of co-design to be appropriate in the policy wording. As such guidance would be too detailed for the Local Plan policy. The Statement of Community Involvement (SCI) is the correct document to provide that detail. The Council will review the SCI following the Local Plan adoption to add further detail on co-design in planning and development.</p> <p><b>Meanwhile uses</b> A change to this policy approach has not been made. We did not consider this change to be necessary as changes were already made following the regulation 18 consultation to ensure meanwhile uses would not undermine the delivery of the final scheme and considers the policy necessary to ensure</p>
--	--	--

	<p><b>Masterplanning requirements</b> One residents group highlighted that masterplanning requirements should consider options for retrofit.</p> <p><b>Piecemeal Development</b> Developers objected to the policy wording resisting piecemeal development and the policy requirement to bring forward a masterplan which covers the whole of a site allocation.</p>	<p>the efficient use of all land in the borough. The Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>Masterplanning requirements</b> The Council's objective for this policy approach is to ensure that masterplans deliver the key Local Plan objectives. Policy CE3 requires developers to consider whole life carbon impacts, which does promote considering retrofit before other options and this is considered aligned with part 3e of policy BFN2. So while this is not a new policy requirement, the Council recognises the importance of ensuring the Plan is clear and that this could usefully be highlighted as a masterplanning consideration. As such we consider the implementation text of this policy could usefully reference whole life carbon considerations and a consideration of retrofit and has therefore made the following wording change: Masterplans should consider how a changing climate will be managed within their development, such as through layouts to reduce overheating, provisions of cool zones, sustainable urban drainage systems and/or flood prevention measures. <b>In addition, whole life carbon considerations should be factored into masterplanning, by considering the possibility for, and benefits of, retrofitting existing buildings and the reuse of any existing materials on site.</b> This is included in the modification table.</p> <p><b>Piecemeal Development</b> The Council's objective for this policy approach is to ensure coordination, prevent developments from prejudicing each other and secure the optimum use of land. The objective and broad policy wording are retained from the current adopted policy S1. This policy is regularly used in pre-application discussions and development management decisions to secure the delivery of key Plan objectives. It does not prevent parcels of land owned by different landowners coming forward for development on their own timescales. As such changes to remove the masterplanning requirement are not supported.</p>
--	--	--

		<p>However, the Council recognises the importance of ensuring the Plan is clear and has therefore made the following wording change to policy BFN2 and it's implementation text: 1. Sites should be designed and developed comprehensively. Piecemeal <del>delivery</del> <b>development</b> will be resisted, particularly where it would prejudice the realisation of the relevant neighbourhood vision, neighbourhood policy, site allocation development principles and/or site allocation design principles or where the timing of delivery would be unsupported by infrastructure.</p> <p>Implementation text BFN2.1: Developments of all scales should be designed and developed comprehensively. Masterplanning enables this by establishing an agreed site or scheme design which considers an optimum approach to address all the factors outlined in part 2.</p> <p>For small sites (developments of under 0.25 ha), it is expected that when multiple small sites form part of an applicant's pipeline and are due to be developed in close proximity to each other and within a similar timeframe, these should be considered comprehensively. Submission documents should demonstrate a coherent design, amenity and delivery strategy. This is particularly the case when undertaking multiple infills on a single housing estate.</p> <p>For major applications and site allocations, compliance with this part of the policy will, in part, be demonstrated by a successful masterplan which delivers against the criteria in parts 2 and 3, <b>including how this relates to any proposed phasing of the site</b>. Where relevant, sites should be supported by a realistic phasing plan.</p> <p>This is included in the modification table.</p>
<b>BFN3: Social Value and HIA</b>	<b>General support</b>	<p><b>General support</b> Support for the policy is welcomed.</p>

	<p>This Policy was broadly supported by NHS Property Services, NHS North East London, HUDU, 6 developers (Hadley Property Group, Primark Stores Ltd, Dominus Stratford Limited, Berkley Homes (South East London Limited), The Silvertown Partnership LLP and Beckton Development Limited) and two community groups (Aston Mansfield and Bonny Downs Community Association).</p> <p><b>Scope of the SV-HIA – approach</b></p> <p>One developer (Hadley Property Group) raised the need for additional clarity regarding when a SV-HIA would be required, including the scale and type of development proposed, as well as a clearer timeframe for requiring an SV-HIA.</p> <p>One developer (Beckton Development Limited) requested that the Social Value Assessment be separated from the Health Impact Assessment.</p> <p>One developer (Berkley Homes (South East London Limited) thought the approach to providing a Social Value and Health Impact Assessment (SV-HIA) through a screening assessment to be overly prescriptive. It, one additional developer (Silvertown Partnership LLP), the Home Builders Federation and one community group (Bonny Downs Community Association) expressed concern that the policy would lead to duplication and cause complication, delay and additional cost.</p> <p><b>Scope of the SV-HIA – scale and type of development and approach to community buildings and markets</b></p>	<p><b>Scope of the SV-HIA - approach</b></p> <p>A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the policy to be positively prepared because Policy BFN3 addresses the need to achieve sustainable development, as set out in the IIA. It is considered that the policy takes a proportionate approach to the need to undertake a Social Value-Health Impact Assessment (SV-HIA).</p> <p>The SV-HIA combines a traditional Health Impact Assessment (HIA) with additional criteria specifically looking at the social value. There is a clear cross over between the delivery of social value and the criteria addressed in a HIA. It is for this reason Newham is bringing together the two measures in one assessment tool.</p> <p>The accompanying Social Value-Health Impact Assessment Guidance Note and Social Value-Health Impact Assessment Screening Tool set out a proportionate approach to the size, location and type of development that is required to undertake a SV-HIA. The Council is satisfied that the plan is sound without the proposed changes.</p> <p><b>Scope of the SV-HIA – scale and type of development and approach to community buildings and markets</b></p>
--	--	--

	<p>HUDU wished to see additional detail around the type and scale of development which should always be subject to a full HIA and additional clarity around the screening tool.</p> <p>One community group (Bonny Downs Community Association) wanted the SV-HIA to consider charities relinquishing use of council community buildings as an opportunity cost in the assessment.</p> <p>The Friends of Queen’s Market wished for markets to be added to the Local Plan definition of community facilities and expressed concern that their value, as important spaces for social interaction, was not being recognised or their use adequately protected.</p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the policy adequately sets out which scale, type and location of development is required to undertake a SV-HIA screening assessment.</p> <p>Policy BFN3 sets out that major development, and proposals where potential health or social value issues are likely to arise, must undertake a screening assessment as early as possible in the development process, to determine whether a Social Value and Health Impact Assessment (SV-HIA) is required.</p> <p>The implementation text to support the policy states that the following developments types of development will be expected to submit a Health and Social Value Impact screening assessment:</p> <ul style="list-style-type: none"> <li>i. Major development</li> <li>ii. Loss, gain or reconfiguration of social infrastructure floorspace</li> <li>iii. New takeaways, water pipe smoking and other kinds of smoking leisure activities, gambling premises and payday loan shops</li> <li>iv. Loss, gain or reconfiguration of publicly accessible green space</li> </ul> <p>Alongside the publication of the Local Plan, we published and consulted on the following documents which are referred to in the implementation text which supports clause BFN3.3:</p> <ul style="list-style-type: none"> <li>• Social Value-Health Impact Assessment Guidance Note 2024 (PDF)</li> <li>• Social Value-Health Impact Assessment Appendix 1 Screening Tool (PDF)</li> <li>• Social Value-Health Impact Assessment Appendix 2 Checklist Tool (PDF)</li> </ul> <p>The Council considers it to be more appropriate to set the type and scale of</p>
--	--	---



		<p>development, which may require a SV-HIA, in the SV-HIA Screening Tool. This will allow officers to monitor the volume of applications we receive, the effectiveness of the policy and make amendments, as required, over the Local Plan period to ensure the effectiveness of the policy.</p> <p>A change to this policy approach, to community buildings, has not been made. We did not consider this change to be necessary as the Local Plan addresses this topic through Policy BFN3 which requires a SV-HIA if there is a loss, gain or reconfiguration of a social infrastructure use through a planning application. However, it cannot deliver the change requested as lease agreements are not subject to planning permission. The Council is satisfied that the plan is sound without the proposed changes.</p> <p>To address the concerns raised by the Friends of Queen's Market, regarding the need for the Local Plan to consider the impact a development may have on an existing or a new internal or external permanent market, the Council recognises the importance of ensuring the Plan is positively prepared and has therefore drafted the following modification, which will be presented to the examiner for their consideration, to BFN3.2 implementation text:</p> <p>The following developments will be expected to submit a Health and Social Value Impact screening assessment:</p> <ul style="list-style-type: none"> <li>i. Major development</li> <li>ii. Loss, gain or reconfiguration of social infrastructure floorspace</li> <li>iii. New takeaways, water pipe smoking and other kinds of smoking leisure activities, gambling premises and payday loan shops</li> <li>iv. Loss, gain or reconfiguration of publicly accessible green space</li> <li><b>v. Development impacting an existing or creating a new internal or external permanent market</b></li> </ul> <p>Newham's Social Value-Health Impact Assessment Screening Tool (2025) and Checklist (2025) include an update to address the modification to the implementation text for Policy BFN3.2.</p>
--	--	--

	<p><b>Scope of the HIA – care leavers and low income groups</b></p> <p>One developer (Dominus Stratford Limited) supported the list of protected characteristics referenced in the policy but requested the implementation text include Care Leavers. In addition, it wanted to see the list of protected characteristics included elsewhere in the Local Plan.</p> <p>One community group (PEACH) requested additional clarity regarding the need for a SV-HIA to consider those on low incomes.</p> <p><b>SV-HIA monitoring</b></p>	<p><b>Scope of the HIA – care leavers and low income groups</b></p> <p>The comment regarding protected characteristics has not resulted in a change. We did not consider this change to be necessary as the implementation text to Policy BFN3 sets out the protected characteristic under the Equality Act 2010 in the UK. However, it is noted that in May 2024 Newham Council has agreed to give more support to some of its most vulnerable young people by recognising care experience as a protected characteristic. The Council recognises the importance of ensuring this policy is reflective of the needs of our community and therefore proposes to make reference to those with care experience in the following suite of documents, which seek to support the delivery of this policy:</p> <ul style="list-style-type: none"> <li>- Social Value-Health Impact Assessment Guidance Note</li> <li>- Social Value-Health Impact Assessment Appendix 1 Screening Tool</li> <li>- Social Value-Health Impact Assessment Appendix 2 Checklist Tool</li> </ul> <p>The comment regarding care leavers has not resulted in a change. We did not consider this change to be necessary as we consider the policy to be positively prepared because the Social Value-Health Impact Assessment Checklist Tool, which accompanies the policy, requires an applicant to consider the potential for adverse or positive impacts on the local population. It sets out that relevant population subgroups, should be considered against each relevant question, as well as any other social value-related considerations of relevance to the development. The checklist definition of population sub-groups includes: key population groups locally such as people suffering from socioeconomic deprivation. The Council is satisfied that the plan is sound without the proposed changes.</p> <p><b>SV-HIA monitoring</b></p>
--	---	--

	<p>HUDU cautioned concern regarding the removal of the monitoring associated with the policy.</p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan sets out a clear monitoring framework, in which SV-HIAs will be monitored. Please see Key performance indicator 5. In addition, the SV-HIA Guidance Note sets out, at Stage 6, the approach to monitoring of a development and the effectiveness of the policy. The Council is satisfied that the plan is sound without the proposed changes.</p>
<p><b>BFN4: Developer contributions and infrastructure delivery</b></p>	<p><b>Prioritisation of affordable housing relative to infrastructure</b>  Transport for London, Places for London, The GLA and the Royal Docks team raised concerns regarding the planning obligation hierarchy preventing necessary site specific infrastructure coming forward and a misalignment with London Plan policy DF1.</p> <p><b>Financial contributions to non-council public services</b>  The NHS and Metropolitan Police requested that the plan include explicit support to secure funding from developments for their organisations.</p>	<p><b>Prioritisation of affordable housing relative to infrastructure</b>  A change to this policy approach has not been made as the Plan is already considered sufficiently flexible to enable to delivery of infrastructure, with the implementation text of policy BFN4.3 already allowing for site level flexibility when the provision of infrastructure is required by the site allocation and/or an infrastructure provider.</p> <p>This prioritisation approach is also in Newham’s adopted Local Plan (2018) and Newham do not consider there to be any examples where required transport infrastructure has not been delivered as a result of the existing policy. The flexibility for site-specific context to lead to changes in the prioritisation of contributions could be used where a piece of transport infrastructure is required for a site to come forward. The Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>Financial contributions to non-council public services</b>  A change to this policy approach has not been made as we consider the plan to already be sufficiently clear on the section 106 requirements for crime and safety mitigations and health mitigation. The obligations identified in the Plan are in line with the Council's priorities and the Council is satisfied that the plan remains sound without the proposed changes. Further discussion and agreement has been reached with NHS NEL, on behalf of NHS bodies in Newham, which is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report.</p>

	<p><b>Infrastructure Sufficiency Assessments</b></p> <p>A number of developers and the Home Builders Federation suggested the removal of the requirement for high density developments to demonstrate there is sufficient infrastructure to support the scale of development on the basis that this is the role of the Council through strategic planning.</p> <p><b>Vacant Building Credit</b></p> <p>The Home Builders Federation objected to this policy requirement on the basis that it is unjustified. Two residents argued the policy should be strengthened and Vacant Building Credit explicitly be removed.</p> <p><b>Viability Appraisals</b></p> <p>Two developers sought amendments to the policy to consider exceptional circumstances and to restrict viability assessments to occasions when the delivery of affordable housing policies only are not met.</p>	<p><b>Infrastructure Sufficiency Assessments</b></p> <p>A change to this policy approach has not been made as this policy wording is in conformity with London Plan policy D2. The development scale thresholds relate to the scale of development we consider to be high density (see policy D3 in the Submission Local Plan) and the important relationship between master planning and consideration of infrastructure capacity. The Local Plan is supported by a significant amount of evidence considering the delivery of the infrastructure required to ensure sustainable development. This is inevitably based on assumptions regarding development density. To ensure the effectiveness and flexibility of the Plan, in cases where density increases above such levels, it is vital that developments demonstrate their development is still supported by suitable infrastructure, in line with paragraph 11 and footnote 39 of the NPPF. The Council is satisfied that the plan is sound without the proposed changes</p> <p><b>Vacant Building Credit</b></p> <p>A change to this policy approach has not been made. We did not consider this change to be appropriate as we consider the policy to be in alignment with the London Plan and it is clear that this incentive is not required for development in Newham, as no site in Newham has sought to apply vacant building credit to date. The Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>Viability Appraisals</b></p> <p>A change to the policy to consider exceptional circumstances and to restrict viability assessments to occasions when the delivery of affordable housing policies only are not met have not been met. We consider the policy to be in alignment with national and regional policy and guidance: paragraph 009 Viability PPG and London Plan Policy H5, in particular, part c3 and paragraph</p>
--	--	---

	<p>One resident sought greater clarity on the alignment of the policy with national guidance. One residents group stated that viability assessments should not be used by developers to avoid meeting their affordable housing requirements and suggested a range of policy changes to address this.</p>	<p>4.5.9. In relation to special circumstances, the retention of the gasholders and the remediation of contaminated land are not planning obligations, which relate to the nature of the proposed scheme being delivered. The retention of the gasholders and the remediation of contaminated land are costs associated with the land and would be required irrespective of the nature of the scheme being brought forward. As such, inline with paragraph 14 of the Viability PPG, such costs should be reflected in both the Benchmark Land Value and Residual Land Value. In addition, the policy and implementation text already provides sufficient flexibility for viability constraints to be considered and for site specific factors to be considered. The policy changes suggested by the residents group are already required in the policy. The Council is satisfied that the plan is sound without the proposed change.</p> <p>However regarding comments on the clarity of when a viability assessment would be required, the Council recognises the importance of ensuring the Plan is clear and uses the same wording as national planning guidance on viability and has therefore made the following wording change: Applicants are expected to deliver all policy requirements and related obligations outlined in the Plan. In exceptional cases, a shortfall of contributions towards the provision of infrastructure or affordable housing (including, but is not limited to, schemes which do not deliver the 60% affordable housing requirement) may be justified on viability grounds. In line with Government guidance, the amount paid for land is not considered to be an exceptional reason to justify <b>not meeting all policy requirements on viability grounds.</b>  <del>provision of site specific viability.</del>  This is included in the modification table.</p>
Design		

<b>D1: Design Standards</b>	<p><b>General support</b> Support for the policy was expressed by the Metropolitan Police Service and several developers.</p> <p><b>Role of council-led guidance vs other guidance</b> Dominus Stratford Limited requested clarification of the types of guidance the policy would support, noting that “Council-led” design guidance and codes at Part 1 appears to diminish the role of the GLA design documents in design and decision making.</p> <p><b>Location of plant equipment</b> The Council's Environmental Health team raised concerns regarding the clarity of the policy's approach in relation to the design of combustion flues.</p>	<p><b>General support</b> Support noted.</p> <p><b>Role of council-led guidance vs other guidance</b> The Council’s objective for this policy approach is to provide locally-specific design principles that build on available best practice published from a range of sources, including the GLA, as set out in the implementation and evidence base sections. The Council recognises the importance of ensuring the Plan is clear in its intention to be consistent with national and regional policies and has therefore made the following wording change to policy D1.1, which is included in the modification table:</p> <p>The modification made to D1.1 policy is:</p> <p>1. All developments should have regard to the Newham Characterisation Study (2024) and any further, <del>relevant Council-led</del>, <b>adopted</b> design guidance/<b>code or guidance supported by the Council</b>, and/or <del>code</del> and apply all of the following qualities of good design where applicable:</p> <p><b>Location of plant equipment</b> In light of Environment Health team’s comments, the Council recognises the importance of ensuring the Plan is clear, consistent and effective and therefore have made the following modification to the implementation section of policy D1.1.</p> <p>The modification made to D1.1 implementation, Mechanical and electrical plant subsection is:</p> <p>Mechanical and electrical plant (excluding solar panels) should be satisfactorily integrated into the form and design of the building. Where</p>
-----------------------------	---	--

	<p><b>Role of Secured by Design guidance and security related planning obligations</b></p> <p>The Metropolitan Police Service welcomed the policy and suggested that reference to a specific level of Secured by Design accreditation should be removed to provide flexibility, and to include specific mention of other Policing Units that do not necessarily administer the SBD Scheme but are nonetheless vital for overall safety and security.</p>	<p>excavation takes place, such plant should be located below ground. If separated from the main building, it should be enclosed and integrated with the landscaping scheme to protect the appearance of the building and the street scene, and avoid being overbearing on neighbouring uses, with careful attention to not generate extensive inactive frontages at ground level. Where combustion flues are necessary, having regard to Local Plan <del>Policy</del> <b>Policies CE2 and CE6</b>, these should <b>normally</b> terminate above the roof height of the tallest building in the development <b>and the immediately surrounding area</b> to ensure maximum dispersion of pollutants. <b>Where this is not possible, alternative measures to prevent nuisance fumes entering nearby buildings should be agreed by the Council.</b></p> <p><b>Role of Secured by Design guidance and security related planning obligations</b></p> <p>The Council's objective for this policy approach is to ensure that safety and security measures are designed in the most effective way, based on the most up-to-date standards. The Council recognises the importance of ensuring the Plan is effective in a range of development scenarios and has therefore made the following wording changes, which are included in the modifications table.</p> <p>The modification made to D1.3 policy is:</p> <p>3. Safety and security features of buildings should be well integrated into the overall design, and complement and not impede delivery of quality public and communal spaces. Major developments should achieve Secured by Design accreditation for the physical security of buildings <del>(Silver award)</del>.</p> <p>The modification made to D1.3 implementation is:</p> <p>[second paragraph]  <del>Where anti terrorism features are required, they should be considered from</del></p>
--	--	---

	<p><b>Application of standards to temporary buildings</b>  The Royal Docks Team and University College London argued that the policy should allow for longer temporary applications in order to improve the viability of the meanwhile schemes, and requested more clarity on how the Council would address the design quality of applications for temporary buildings which may be put forward for longer than the Council's preferred period of up to 5 years.</p>	<p>the outset as part of the wider landscape design and follow the latest design guidance published by the National Protective Security Authority (formerly the Centre for the Protection of National Infrastructure). [text moved from the beginning of this second implementation paragraph to form new paragraph after, in order to separate out the more generally applied SBD accreditation guidance] Secured by Design accreditation for the physical security features for buildings will be expected for all major developments (i.e. over 10 residential units and/or 1000sqm of non-residential uses). <del>Developments should aim to achieve Silver Award level.</del> Early and ongoing engagement with the Metropolitan Police Service's <b>Designing out Crime Officers (DOCOs)</b> is encouraged to ensure the proposal can meet this level of accreditation, and to understand what other teams should be engaged in the design and delivery processes - e.g. Counter Terrorism Security Advisors (CTSAs), the Traffic Management Unit (TMU) and/or the British Transport Police (BTP).</p> <p><b>Where anti-terrorism features are required, they should be considered from the outset as part of the wider landscape design and follow the latest design guidance published by the National Protective Security Authority (formerly the Centre for the Protection of National Infrastructure).</b></p> <p><b>Application of standards to temporary buildings</b>  The comment you have provided has not resulted in a change. We did not consider a change to the preferred timeframe for temporary development to be necessary as the policy provides a suitable balance between offering planning flexibility for temporary buildings/structures and securing long term quality development in the borough.</p> <p>However, the Council recognises the importance of ensuring the Plan is consistent and clear and has therefore made the following wording change to the implementation section of policy D1.4, which is included in the</p>
--	--	--



		<p>modifications table.</p> <p>The modification made to D1.4 implementation is:</p> <p>Temporary buildings may display a transient materiality, but the quality of the overall design should remain of a high standard. <b>The choice of construction methods, landscaping, materials and finish should take into account the character of the local context and the impact on the public realm and amenity, balanced against the expected timeframe of the development. Meeting highest possible accessibility standards, as set out in the implementation text of part 1 of this policy (Social, ecological and physical integration subsection), will be particularly important when the building is intended for public access or primarily services a section of the population with special needs.</b></p> <p>[insert space to start new paragraph] The Design and Access Statement should provide information on the lifespan of materials used, including maintenance considerations, accounting for the possibility that the temporary use may persist for longer than three years. This detail will also need to be provided in support of applications to extend temporary permissions, including where the original permission pre-dates this Plan or where cumulatively the development would persist for longer than three years. This is to ensure that the quality of development is suitable for the intended duration. <b>Nevertheless, it will rarely be justifiable to grant a second temporary permission, except in cases where changing circumstances provide a clear rationale.</b></p>
<b>D2: Public realm net gain</b>	<p><b>General support</b> Sports England, NHS HUDU, the Environment Agency, the Metropolitan Police Service, Stratford Original BID, a resident and several developers expressed support for the policy.</p>	<p><b>General support</b> Support noted.</p>

	<p><b>Planning obligations for enhancement and maintenance of highways</b> St William Homes LLP, Dominus Stratford Limited and SEGRO sought flexibility in how planning obligations for the enhancement and maintenance of public realm enhancements would be sought, arguing that viability and scope of each scheme should be taken into consideration.</p> <p><b>Playspace in public realm</b> St William Homes LLP and Berkeley Homes (South East London) Limited continued to argue that the policy should allow for greater flexibility to reflect site-specific context where it may be difficult to provide playspace in the public realm.</p>	<p><b>Planning obligations for enhancement and maintenance of highways</b> A change to this policy approach has not been made. We did not consider this change to be necessary as the policy already provides sufficient flexibility through requiring the contribution to be proportionate, which recognises the need for site-specific and development-specific circumstances to be factored in. The policy is based on the recommendations of the Characterisation Study (Chapter 9), builds on a host of existing best practice guidance (including from the National Protective Security Authority) and aligns with the requirements of the London Plan Policy D8: Public Realm. The policy is deliverable as demonstrated by the Viability Assessment (2024), which did not consider this policy to result in abnormal costs, with the modest requirements being able to be incorporated within the wider allowances for Section 106 contributions.</p> <p><b>Playspace in public realm</b> A change to this policy approach has not been made. We did not consider this change to be necessary as the policy already has been amended to provide flexibility to site-specific circumstances, as set out in our Reg 18 Consultation Report.</p>
<b>D3: Design-led capacity optimisation</b>	<p><b>General support</b> Primark Stores Ltd, Dominus Stratford Limited and The Silvertown Partnership LLP expressed support for the policy.</p> <p><b>Design-led approach</b> A resident requested clarity that a 'design-led' approach is not an excuse to increase density or to reduce social and affordable provision. Another resident wanted to see specific support for upwards extensions and double storey rear extensions to existing homes.</p>	<p><b>General support</b> Support noted.</p> <p><b>Design-led approach</b> A change to this policy approach has not been made. The Council considers that we have adopted an appropriate framework for what 'design-led' means in the Newham context, evidenced by the Characterisation Study (2024) and following the process guidance set out in the GLA's Characterisation and Growth Strategy LPG. We note that the GLA have not</p>

	<p>Hadley Property Group continued to argue that the policy should not specify 'moderate density' as it would not help optimise the use of land. Dominus Stratford Limited argued that the policy should better explain what optimisation of a site means in practice aligning with the definition set out in London Plan Policy D3, and specifically supporting higher density in areas of high PTAL. Further, Get Living Plc argued that the policy should allow for buildings higher than 100m where design quality is demonstrated.</p>	<p>raised any concerns with the way Newham's policy guides the application of what 'design-led' means in the specific context of the borough's built environment. The plan is applied in the round, as relevant to the type and scale of development proposed. Therefore, policy criteria for managing density and massing through policy D3 apply alongside the requirements of other policies, e.g. affordable housing (Policy H3), or tall buildings (Policy D4), and will all be given weight in the development management process. Further design guidance to support small sites coming forward is provided in the Small Sites Intensification Guidance 2024.</p>
<b>D4: Tall Buildings</b>	<p><b>Definition of tall building</b> The GLA supported the definition of a tall building which meets the requirements of London Plan policy D9 part A and which is set at 21m. Developers, Aston Mansfield and THESET LTD, proposed setting a higher benchmark or more than one tall building definition in relation to different contexts of the borough.</p> <p><b>Flexibility - Greater heights</b> Developers considered the proposed prevailing heights and maximum heights permissible too restrictive and requested either the removal of maximum height parameters and/or to have greater prevailing heights and/or maximum heights. The GLA and some developers suggested using the term 'appropriate height' rather than maximum height to allow some flexibility. Some developers, AIM Land Ltd, Ballymore and GLP (International Business Park, Rick Roberts Way), also proposed allowing more flexibility for tall buildings outside of tall building zones. Some developers, raised</p>	<p><b>Definition of tall building</b> A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the plan to be in conformity with London Plan policy D9 part A, which requires boroughs to define what is a tall building based on local context. In accordance with Policy D9 part A, and based on local context analysis, Newham has defined 21m (ca. 7 storeys) as the height at which buildings become substantially taller than their surroundings. The GLA is supportive of our methodology and definition of tall building which meets the requirements of Policy D9 part A.</p> <p><b>Flexibility - Greater heights</b> A change to this policy approach has not been made as the Council considers the policy to be in conformity with London Plan Policy D9, which requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. The Council also considers that the methodology used to identify suitable locations and height for tall buildings, included in Newham Characterisation Study (2024) and Tall Building Annex (2024), complies with the Characterisation and Growth Strategy LPG. The proposed tall building strategy adequately addresses the design-led approach and optimisation</p>

	<p>concerns about the methodology used to identify suitable locations for tall buildings and to mandate these heights and zones.</p> <p><b>Consistency between permitted heights and proposed heights</b> A number of developers objected to the inconsistency between consented schemes and proposed maximum heights.</p> <p><b>Objection to tall buildings</b> A resident objected to tall building developments, expressing his concern in relation to the low quality design</p>	<p>considerations to enable varying building heights within a tall building zone, allowing for transitioning heights from the tallest element to the surrounding context and sensitive areas, whether low-rise context or historic asset.</p> <p>Where developers have flagged an inconsistency in the methodology, a review of the sensitivity and suitability for tall building developments has been undertaken. Through this further review, it was concluded that we have adopted a consistent approach to identify locations where tall buildings may be an appropriate form of development and that maximum proposed heights were in line with the methodology.</p> <p>More details can be found in the Tall Buildings Topic Paper (2025).</p> <p><b>Consistency between permitted heights and proposed heights</b> A change to this policy approach has not been made as the Council considers the plan to be positively prepared. A review of permitted heights was undertaken as part of the methodology to establish the maximum heights within tall building zones. However, whilst we acknowledge that consents have been granted with tall elements at greater heights than the heights allowed within the tall building zone designation in the submission plan, and that the sites can still benefit from these consents, these consents were permitted under the adopted Local Plan. The submission Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough-wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context. More details on the methodology used to identify suitable locations and heights for tall buildings can be found in the Tall Building Annex (2024) and Tall Buildings Topic Paper (2025). The Council is satisfied that the plan is sound without the proposed changes.</p> <p><b>Objection to tall buildings</b> A change to this policy approach has not been made as, in line with London Plan policy D9, the Council's objective for this policy approach is to identify</p>
--	--	--

	<p>and management of post-war high rise developments and suggesting that high density developments could be achieved through medium rise developments.</p> <p><b>Airport constraints</b>  London City Airport provided height limit thresholds and suggested additional detailed safeguarding requirements for neighbourhoods and corresponding tall building zones, which are constrained by the London City Airport safeguarding limitation, should be added to the Plan. The Royal Docks Team objected to the policy approach of defining maximum building heights on sites constrained by the London City Airport safeguarding limitation, suggesting that heights parameters should reflect the maximum possible within the airport safeguarding limits.</p> <p><b>Support for industrial intensification</b>  GLP (Land at Central Thameside West and Former Alnex site) supported the changes to policy D4 which included Strategic</p>	<p>locations where tall buildings may be an appropriate form of development based on assessment of existing height, proximity to public transport, impact on open space and heritage assets. The plan supports high density developments delivered with medium rise buildings, however, tall buildings in the right locations can help support growth.</p> <p>The design quality of tall buildings and their relationship with the sensitive context, whether low rise or heritage assets, will be addressed through clauses 3 and 4 and through a range of policies in the Local Plan, including co-design masterplanning, homes and design policies and in line with national design standards. The Council is satisfied that the plan is sound without the proposed changes.</p> <p><b>Airport constraints</b>  The policy approach has not been changed as the Council considers that referencing heights limit threshold for airport safeguarding analysis could lead to misinterpretation or make the policy out of date, if safeguarding zones change during the plan period. The identified maximum heights also align with the spatial hierarchy of the plan.</p> <p>However, a modification has been made to ensure the plan is comprehensive and easy to read, referencing airport safeguarding limitations in all the tall building zones that are within the neighbourhoods constrained by the London City Airport safeguarding limitation.</p> <p>The modification proposed is: [Add '<b>subject to airport constraints</b>' to TBZ5: Gallions Reach, TBZ7: King George V/Pier Parade, TBZ8: Store Road / Pier Road, TBZ11: Lyle Park, TBZ12: Custom House, TBZ13: Canning Town, TBZ21: Excel West, TBZ22: Thameside East].</p> <p><b>Support for industrial intensification</b>  A change to this policy approach has not been made as the Council considers the plan to be positively prepared. A review of the tall building assessment</p>
--	--	--

	<p>Industrial Locations in the tall building designation, in order to support industrial intensification with a stacked industrial typology.</p> <p>Developers, AIM Land Ltd, GLP (International Business Park, Rick Roberts Way), with an interest in other industrial land in the Borough requested the reconsideration of the approach to tall building zones in the context of the London Plan and Local Plan industrial intensification objectives.</p> <p><b>Impact on conservation areas and heritage assets</b></p> <p>The GLA supported the policy and the methodology but suggested including the London View Management Framework (LVMF) 8A.1 and 9A.1 in the policies map and in the plan for clarity.</p> <p>Historic England supported the changes to Policy D4 with regard to better referencing heritage considerations to avoid the impact tall building developments could have on conservation areas and heritage assets. However, Historic England continued objecting the robustness of the evidence base supporting Policy D4 and site allocations within Stratford and Maryland Neighbourhood.</p> <p><b>Impact on watercourses, open spaces and microclimate</b></p>	<p>was undertaken following representations received at Regulation 18. Through this analysis it was concluded that, due to their location in the Royal Dock and Beckton Riverside Opportunity Area, the Strategic Industrial Locations could be included, where necessary, in the tall building designation in order to support industrial intensification with a stacked industrial typology.</p> <p>Industrial intensification is also supported and deliverable outside tall building zones in line with the Industrial Land and Uses Draft LPG. More details on the industrial intensification in relation to tall buildings allocations can be found in the Tall Buildings Topic Paper (2025). The Council is satisfied that the plan is sound without the proposed changes.</p> <p><b>Impact on conservation areas and heritage assets</b></p> <p>A modification has been made to ensure the plan accurately references the two strategic LVFM views that intersect with the borough.</p> <p>The modification made is: [Westminster Pier to St Paul's Cathedral 8A.1 and Richmond to St Pauls 9A.1 protected vistas will be added to the Policies Map for clarity].</p> <p>The Council considers that Policy D4 is supported by a robust evidence base. However, Historic England and the Council agreed that a review of the St John's Conservation Area Appraisal and Management Plan will be undertaken following the adoption of the Local Plan to ensure the protection of the historic environment within Stratford and Maryland neighbourhood. The Council is satisfied that the plan is sound without the proposed changes.</p> <p><b>Impact on watercourses, open spaces and microclimate</b></p>
--	--	--

	<p>The Lee Valley Regional Park Authority supported the changes to Policy D4 Tall Buildings: to reference the green and water policy, add details within the Implementation text, the new wording added to the guidance section of Table 1 of relevant tall building zones and corresponding design principles in relevant site allocations to manage the impact tall building developments could have on waterways and heritage assets.</p> <p>The Environment Agency supported the additional wording to the Implementation text D4.3 and to the guidance section of Table 1 to prevent overshadowing impact on open spaces and watercourses. However, they raised concerns about the inconsistent approach to tall building zones in proximity to waterspaces.</p>	<p>Newham has drafted the following modifications, which will be presented to the examiner for their consideration, to ensure the plan is positively prepared, consistently references all riverside tall buildings zones in the tall building guidance and are consistent with the terminology used in policy GWS2.</p> <ol style="list-style-type: none"> <li>1. Add ["<b>Careful consideration is required for the location of tall buildings, particularly along the waterways to avoid overshadowing impact on waterspace.</b>"] to the following Tall Building Zones: <ul style="list-style-type: none"> <li>- TBZ5: Gallions Reach</li> <li>- TBZ6: Albert Island</li> <li>- TBZ8: Store Road / Pier Road</li> <li>- TBZ9: Royal Albert North</li> <li>- TBZ10: North Woolwich Road</li> <li>- TBZ11: Lyle Park West</li> <li>- TBZ13: Canning Town</li> <li>- TBZ14: Manor Road</li> <li>- TBZ19: Stratford Central</li> <li>- TBZ21: Excel West</li> </ul> </li> <li>2. Replace the word watercourses with waterspaces to be consistent with the GWS2's terminology to the following Tall Building Zones: <ul style="list-style-type: none"> <li>- TBZ15: West Ham Station</li> <li>- TBZ16: Abbey Mills</li> <li>- TBZ18: Stratford High Street</li> </ul> </li> <li>3. Replace the word watercourses with waterspaces to be consistent with the GWS2's terminology to implementation text D4.3: [As set out in Policies GWS2 and GWS3, tall buildings should also assess the consequent impact on green and water spaces. Development proposals for tall buildings should avoid overshadowing, which can negatively affect plant growth, as well as the quality of existing and proposed public open space, including <b>watercourses waterspaces.</b>]</li> </ol>
--	---	---

<b>D5: Shopfronts and advertising</b>	<b>General support</b> The Metropolitan Police Service and The Silvertown Partnership LLP expressed support for this policy.	<b>General support</b> Support noted.
<b>D6: Neighbourliness</b>	<b>General support</b> The Metropolitan Police Service and Aston Mansfield and SEGRO expressed support for this policy.  <b>Agent of Change/Measuring amenity impacts</b> The Environment Agency re-iterated Reg. 18 comments that recommended that the implementation section highlight the importance of the agent of change approach for supporting regulated industry activities and operations. SEGRO and Tate & Lyle Sugars argued for the policy to provide greater support for the future intensification of employment land, including through technical studies assessing the reasonable worst case scenario of amenity impacts on a site.	<b>General support</b> Support noted.  <b>Agent of Change/Measuring amenity impacts</b> The Council's objective for this policy approach is to support the intensification of employment land in line with the spatial strategy set out in the Plan, while securing good quality of amenity mitigation for development in its proximity.  The Council considers that policy part 2b already seeks to secure the viability of industrial intensification on employment land, which is consistent with the approach set out in spatial policies of the Plan.  However, the Council recognises the importance of ensuring the Plan is clear in its intended applications of the agent of change and related reasonable worst case assessment in relation to the spatial strategy for industrial intensification and has therefore made the following wording change to the implementation section of D6.2, which is included in the modifications table. The modification made to D6.2 implementation is:  To secure the long-term viability of <del>new</del> <b>existing and future</b> employment <b>uses on employment land (including intensification in line with Policy J2)</b> <del>floorspace and compatibility of proposals close to designated employment land,</del> the policy requires applicants to demonstrate that proposed <b>vulnerable uses (such as residential uses or schools) exposed to the various amenity impacts generated by a range of uses on employment land</b> can successfully co-exist <b>long-term</b> in the context of their site, <del>particularly when</del>



		proposing uses that may be more vulnerable to the amenity impacts, such as residential uses or schools. The area and intensity of amenity impacts will vary between different uses (e.g. a wharf vs. a paper recycling centre). The assessment and mitigations should reflect a reasonable worst case scenario for the baseline amenity impacts (see further in this section) as well as a proportional assessment of amenity impacts from potential future intensification of employment land as part of the lawful intensification of use on SILs and LILs, having regard to national regulatory context and the spatial strategy set out in this Plan.
<b>D7: Conservation Areas and Areas of Townscape Value</b>	No key issues were raised.	Comments received were noted.
<b>D8: Archaeological Priority Areas</b>	<p><b>General support</b> Aston Mansfield expressed support for the policy.</p> <p>No other comments were received.</p>	<p><b>General support</b> Support noted.</p>
<b>D9: Designated and non-designated heritage assets, ancient monuments and historic parks and gardens</b>	<p><b>General support</b> The Silvertown Partnership LLP and Ballymore expressed support for the policy.</p> <p>No key issues were raised.</p>	<p><b>General support</b> Support noted.</p>
<b>High Streets</b>		

<p><b>High Streets – general or evidence base</b></p>	<p><b>General support</b> St William Homes LLP and IQL Office LP expressed support for the objectives of this section of the Plan.</p> <p><b>The Retail and Leisure Study (2022)</b> Friends of Queen’s Market community group expressed concern with the extent to which the Retail and Leisure Study 2022 provides robust evidence to support the role of Queens Market as part of Green Street town centre.</p>	<p><b>General support</b> Support noted.</p> <p><b>The Retail and Leisure Study (2022)</b> The Retail and Leisure Study (2022) is a borough-wide study addressing a range of aspects related to the vitality and viability of Newham's Town Centres. It does not focus specifically on markets. Nevertheless, the results of the telephone survey that has informed the study did identify that markets are a footfall driver for Newham's town centres. This has resulted in recommendation LBN18 that markets should be protected in policy, particularly noting the strong function of Queens Market, which has informed policy HS4. We consider that the study has provided a proportionate level of consideration to the role of Queen’s Market, and Newham's existing markets in general, and provides robust evidence for the Local Plan.</p>
<p><b>HS1: Newham’s Town Centres Network</b></p>	<p><b>General support</b> Ballymore, Primark Stores Ltd, Unibail-Rodamco-Westfield and the London Borough of Tower Hamlets expressed support for the policy.</p> <p><b>Impact Assessment threshold consistency</b> St William Homes LLP noted that policy HS1.4 sets out two different retail impact assessment thresholds, which is confusing.</p>	<p><b>General support</b> Support noted.</p> <p><b>Impact Assessment threshold consistency</b> The Council’s objective for this policy approach is to ensure that the vibrancy of Newham's neighbourhood parades is balanced against the need to protect the vitality and viability of the network of town and local centres. However, the Council recognises the importance of ensuring the Plan is clear and consistent, noting that the Retail and Leisure Study recommended the single threshold of 300sqm GIA for impact testing. Therefore Newham has drafted the following modification, which will be presented to the examiner for their consideration:</p>

	<p><b>The role of new small scale frontages serving localised need</b></p> <p>RAD CHP Ltd commented that the newly designated Royal Albert Quay Neighbourhood Parade may not be sufficient to meet the needs of the future neighbourhood growing around it.</p>	<p>Policy HS1:</p> <p>4. Development within neighbourhood parades or proposed new non-designated small scale shopfront unit groupings should ensure that:</p> <p>a. The overall parade remains of a neighbourhood scale, of between five and ten non-residential units, and primarily small units (80 to 150 sqm GIA) in use class E (Commercial, Business and Service) or social infrastructure of a scale justified by local need. <b>Where development includes 300sqm GIA or more of cumulative new floorspace in retail (Class E(a)) or in main town centre leisure uses (Class E(b) or Sui Generis), a retail and/or leisure Impact Assessment will need to be passed.</b></p> <p>[...]</p> <p>d. Any proposal resulting in 1000 sqm GIA or more cumulative floorspace in main town centre uses, including creation of new neighbourhood parades, is supported by <del>an Impact Assessment</del> and a well-resourced Vacancy Prevention Strategy.</p> <p><b>The role of new small scale frontages serving localised need</b></p> <p>The objective of the Royal Albert Quay Neighbourhood Parade designation is to address a known gap in the network, and the location and scale of this designation is supported by the methodology and assessment undertaken in the Town Centre Network Review Methodology Paper Update 2024.</p> <p>However, policy HS1 intends to provide further flexibility in meeting needs in areas not within 400m radius of an existing or planned town or local centre or neighbourhood parade, by allowing for the masterplanned delivery of small scale frontages serving localised need. The Council recognises the importance of ensuring the Plan is clear in its intended application.</p> <p>The modification made to policy HS1.1 is:</p> <p>1. [...]The network will be managed and supported to service the needs of residents, workers and visitors, and includes:</p>
--	---	--

		<p>[...] f. The creation of <del>new small scale frontages serving localised need including</del> new Neighbourhood Parades at N17.SA1 Beckton Riverside, N2.SA2 Lyle Park West and N8.SA3 Greater Carpenters District; <b>and</b></p> <p><b>g. The creation of new small scale frontages serving localised need in areas not within 400m radius of an existing or planned town or local centre or neighbourhood parade.</b></p> <p>The modification made to policy HS1.1 implementation is:</p> <p><b>New Small scale shopping frontages</b></p> <p>It is not possible to fully address all 400m catchment gaps in the network at this time <del>due to lack of available, suitable and deliverable sites</del>. To provide additional flexibility to address this <del>through windfall sites</del>, the policy allows for small scale <del>shopping</del> frontages to be delivered, of a similar function to the designated neighbourhood parades, <b>and which will be considered towards designation as a neighbourhood parade as part of future reviews of the Local Plan.</b></p> <p>In determining if a proposed new un-designated <del>shopping</del> <b>small scale</b> frontage is appropriate, the applicant should submit a gap analysis to demonstrate:</p> <ul style="list-style-type: none"> <li>• Proximity criteria: A 400 metre radius around the proposed <del>shopping</del> <b>small scale</b> frontage overlaps by less than 50 per cent with any other 400 metre radius of a designated area in the network (existing and future). The radius is measured from the perimeter of the proposed <del>shopping</del> <b>small scale</b> frontage and the boundary of relevant designated parts of Newham's High Streets network. And</li> <li>• Network density criteria: The proposed <del>shopping</del> <b>small scale</b> frontage location helps achieve the aspiration for at least two high street destinations within a 15 minute walking area. This should reflect a detailed understanding of the actual walking conditions for a range of different users) of the site (e.g. accessibility conditions for people with movement impairments, women-friendly routes). The most accessible area should be</li> </ul>
--	--	---

	<p><b>Scale criteria for new/extended local centres</b> St William Homes LLP and The Silvertown Partnership LLP continued to argue that the requirement for impact testing as well as the unit size criteria for new local centres set out in policy HS1.3 are too restrictive.</p>	<p>chosen, accounting for any proposed enhancements as part of the development or known programmed Highways works.</p> <p>In limited circumstances where site allocations are expected to deliver new centres/<b>parades</b>, the above criteria may be used to justify the split of the provision of retail and leisure uses across parts of the site, thereby generating one or more new <del>shopping</del> <b>small scale</b> frontages alongside the necessary centre/<b>parade</b>. A clear justification will be required for the benefits of this approach compared to clustering of uses in the <del>centre</del> <b>designation</b> only, and should not result in additional retail or leisure floorspace being provided on site (i.e. the cumulative site-wide quantity is justified by local catchment need, through the Impact Assessment). Further expansion of main town centre use floorspace for ground floor frontage activation will normally not be supported.</p> <p><b>Where acceptable in principle, new small scale frontages should also meet the criteria set out in part 4 of this Policy.</b> The Newham Characterisation Study (2024) Borough-wide Design Principles chapter includes further design recommendations (primarily under section 9.2.1 ‘Provide Local Uses That Support 15 Minute Neighbourhoods’) that should be imbedded in the design brief when new <del>shopping</del> <b>small scale</b> frontages are proposed.</p> <p><b>Scale criteria for new/extended local centres</b> A change to this policy approach has not been made We did not consider this change to be necessary as the requirement for a retail/leisure impact test as part of the creation of new local centres is necessary in order to ensure that the overall network remains balanced and that the new centre is of a scale that responds to evidenced local needs rather than creating a new destination, as required by the Retail and Leisure Study (2022). Policy HS1.3 provides further guidance about what the overall main town centre use floorspace of a new local centre should be designed as, and the policy has</p>
--	---	--

	<p><b>Canning Town potential future extension</b> Muse requested that the Policies Map designation of 'Potential Future Extension to Canning Town District Centre' be made to the town centre boundary directly, rather than indicated as a potential future extension, and that it should include the whole development parcel at Land Comprising Former HSS Site and 300 Manor Road.</p> <p><b>Alignment with LLDC Local Plan (2020) town centre boundaries</b> Get Living Plc argued that the boundary change (swap) between East Village Local Centre and Stratford Town Centre be reversed to reflect the LLDC Local Plan (2020).</p> <p><b>Silvertown Local Centre Extension</b> The Silvertown Partnership LLP has argued that the Silvertown Quays site allocation should provide a new and separate local centre to that of the established Silvertown Local Centre, which lies adjacent to the site. They further argued for an alternative, wider boundary.</p>	<p>already been amended from Reg. 18 to Reg. 19 to provide flexibility in unit sizes.</p> <p><b>Canning Town potential future extension</b> A change to this designation has not been made. We did not consider this change to be necessary as the boundary shown on the Policies Map had been reached with due regard to the approved masterplan for the site, as set out in the Town Centre Network Review Methodology Paper 2022. The Council will assess the performance of the newly delivered floorspace as part of a future Local Plan review to identify whether this section of new main town centre uses should be included into the boundary of the town centre, as there is not sufficient evidence to support this at this time.</p> <p><b>Alignment with LLDC Local Plan (2020) town centre boundaries</b> A change to this designation has not been made. We did not consider this change to be necessary as the issue of the boundary changes between Stratford Town Centre and East Village local centre has been subject to further discussion with the LLDC before their transition of planning powers back to the borough and a satisfactory resolution has been found, thereby the LLDC agreed to the boundaries set out in the new Plan. This is set out in more detail in a Statement of Common Ground, and referred to in the Duty to Cooperate Addendum (2025).</p> <p><b>Silvertown Local Centre Extension</b> A change to this policy approach has not been made. We consider this change would undermine delivery of a network of well-connected, integrated neighbourhoods. A single integrated Local Centre optimises opportunities within the wider location. It is logical in terms of how it relates to travel patterns and the proximity of main town centre uses creating a single cluster. The Council considers that the proposed scale and location of</p>
--	--	--

	<p><b>Gallions Reach Shopping Park and relationship to the future town centre at Beckton Riverside</b></p> <p>Relevant comments have been submitted by ABRDN in relation to N17.SA1 Beckton Riverside site allocation and the principles of bringing forward a town centre on this site, which is currently also the location of Gallions Reach Shopping Park.</p>	<p>the boundary represents a proportionate distribution of the retail floorspace need in the Royal Docks area as set out in the Retail and Leisure Study (2022) and the Town Centre Network Review Methodology Paper Update 2024. The policy allows for the boundary of the Local Centre extension to be flexibly adjusted through masterplanning processes, and does not impede a difference in the character of the offer on either side of the North Woolwich Road.</p> <p>Further, the overall vision for the site can be achieved through other forms of activation than simply the use of main town centre uses, and which is set out and supported in the site allocation principles.</p> <p><b>Gallions Reach Shopping Park and relationship to the future town centre at Beckton Riverside</b></p> <p>The objective of the Local Plan, through the Beckton Riverside site allocation and policies HS1.2 and HS2, are to provide a framework for the delivery of a new town centre at Beckton Riverside which can serve the needs of the emerging neighbourhood. The Council considers that we have adopted an appropriate balance between the need to carefully masterplan the transition of the local retail and leisure offer from that of an out of centre retail park to that of a town centre, while recognising the existing role of Gallions Reach Shopping Park, and other Beckton retail parks, in serving local needs, as evidenced by the Retail and Leisure Study (2022).</p> <p>However, the Council recognises the importance of ensuring the Plan is clear in its intended application of policy for the management of out of centre retail parks, and has drafted a modification, which will be presented to the examiner for their consideration, to policy HS3 (see HS3 section below). In order to ensure consistency with the site allocation and clarity with Newham's approach to the management of out of centre retail parks (see HS3 section below), a modification is made to policy HS1.2 and its implementation section.</p>
--	--	---

		<p>The modification made to policy HS1.2a is:</p> <p>2. New development for the provision of main town centre uses within N17.SA1 Beckton Riverside, must be accompanied and informed by masterplanning of the new town centre. This will be achieved through:</p> <p>a. <del>Not supporting incremental change to the composition of</del> <b>Managing</b> the existing <del>out-of-centre</del> Gallions Reach Shopping Park <b>as an out-of-centre retail park.</b></p> <p>A further consistency modification is made to the implementation section of policy HS1.2 to reflect the progressed commitment towards a new DLR station on the Beckton Riverside site allocation and the related development trigger point in the site allocation. The modification made to policy HS1.2 implementation is:</p> <p>In the interim, while key masterplanning decisions are outstanding and particularly until commitment to the new DLR station is <del>known</del> <b>secured such that the development trigger clause of N17.SA1 Beckton Riverside site allocation is met</b>, changes to Gallions Reach Shopping Centre will continue to be managed as an out of centre destination.</p>
<b>HS2: Managing new and existing Town and Local Centres</b>	<p><b>General support</b> The Metropolitan Police Service, Stratford Original BID and several developers expressed support for this policy.</p> <p><b>Use Class E concentration within Primary Shopping Areas</b> The Silvertown Partnership LLP argued that the requirement in terms of 80% of units being in Class E use in all town and local centres is too onerous and may not be achievable in the context of future new development at Silvertown Local Centre.</p>	<p><b>General support</b> Support noted.</p> <p><b>Use Class E concentration within Primary Shopping Areas</b> A change to this policy approach has not been made. We did not consider this change to be necessary as the approach is justified by the recommendations of the Retail and Leisure Study (2022) and supports the viability and vitality of Newham's centres. Further, Use Class E itself provides broad flexibilities of use. The extent to which the Silvertown local centre's extension would also contribute an extension to the designated existing</p>



	<p><b>Support for local businesses and affordable rent units</b>  The Silvertown Partnership LLP argued that the requirement for major non-residential developments to deliver 10% of Class E floorspace as small units marketed at discounted rents would impact development viability, and could lead to vacancies and unfair competition in the local market. Ballymore reiterated their Reg. 18 argument that the requirement should not apply to re-provided floorspace and that the unit size criteria should be removed. Manor Park Business Association and Stratford Original BID argued that the role of existing local businesses in supporting investment should be recognised and protected.</p> <p><b>Vacancy Prevention Strategy requirement</b>  The Silvertown Partnership LLP argued that the Vacancy Prevention Strategy should not be required, and that it adds to delays in the development management process. A few residents and Stratford Original BID have identified concerns with existing and recently built high street premises remaining vacant for extended periods of time.</p>	<p>local centre's Primary Shopping Area, including by meeting the Use Class E target, will depend on masterplanning in line with HS1.3 criteria, including the need for impact assessment. Areas of the local centre not proposed within the primary shopping area (as extended) will not need to meet this threshold.</p> <p><b>Support for local businesses and affordable rent units</b>  A change to this policy approach has not been made. We did not consider a change to be necessary as the Viability Assessment indicates that the requirement should not adversely impact on developers' ability to bring schemes forward and meet other policy requirements. It further noted that there is no significant difference in the viability outcome between schemes of different scales and that, for practical purposes, schemes with a higher quantity of floorspace would more readily be able to provide the requirement. The policy is intended to support small businesses, which primarily operate from smaller units in Use Class E, and is consistent with the approach set out in policy HS1. Further, the policy is justified by the Retail and Leisure Study Appendix 6 Topic Paper: Supporting Provision Of Affordable Small Business Premises, and represents an important way in which the Local Plan meets its objective of supporting small businesses to contribute to the borough's economy as part of supporting thriving high streets. However, the Local Plan cannot support specific business interest.</p> <p><b>Vacancy Prevention Strategy requirement</b>  A change to this policy approach has not been made. We did not consider this change to be necessary as our approach is justified. Authority monitoring indicates that a number of recent main town centre uses delivered within large scale mixed use developments have remained vacant for extended periods of time following delivery, sometimes for years. It is therefore imperative that the Local Plan process enables proactive management of this issues. The benefits of having a meanwhile use</p>
--	--	---

	<p><b>Marketing Strategy requirement</b></p> <p>The Silvertown Partnership LLP argued that the requirement to undertake a Marketing Strategy should not be required, and that it adds to delays in the development management process.</p>	<p>approach to managing vacancies, i.e. a Vacancy Prevention Strategy, are becoming more established, with positive evidence emerging from the High Streets Task Force and other case studies - please see Topic Paper: Managing Vacancies Through Meanwhile Use Strategies (2024) appended to the Retail and Leisure Study (2022).</p> <p><b>Marketing Strategy requirement</b></p> <p>A change to this policy approach has not been made. We did not consider this change to be necessary as our approach is justified. Authority monitoring indicates that a number of recent main town centre uses delivered within large scale mixed use developments have remained vacant for extended periods of time following delivery, sometimes for years. The effectiveness of having a Marketing Strategy to prompt proactive market research and seeking occupier commitments has been demonstrated through current development management practice.</p>
<p><b>HS3: Edge-of-Centre and Out-of-Centre retail, restaurants, cafes and services</b></p>	<p><b>Management of out of centre retail parks</b></p> <p>B&amp;Q Limited submitted representations stating that policy HS3 has not accurately reflected the role of retail parks in Newham in servicing local needs, which was picked up by the findings of the Retail and Leisure Study (2022). They considered that the spatial strategy for Newham's town centres network would not provide opportunities for retail operators that require units typical of retail parks. They suggested removing the end text of policy HS3.1, which supports the full loss of full loss of floorspace in retail (Ea), restaurants and cafes (Eb) and services (Ec) uses in edge of centre and out of centre locations.</p>	<p><b>Management of out of centre retail parks</b></p> <p>The objective of the Local Plan, through the site allocations and policies HS1 and HS2, are to provide a framework for protecting the vitality and viability of existing town and local centres in Newham, and for the creation of new ones where supported by the evidence base and the Integrated Impact Assessment supporting the Plan. Policy HS3 complements these policies by promoting consolidation of retail, leisure and services in centres, unless the evidence base justifies a different approach.</p> <p>The Retail and Leisure Study (2022) recognises the existing role of Beckton's retail parks in serving retail needs in the borough, particularly for bulky goods comparison retail. It recommends that opportunities to reconfigure, redevelop, reposition etc. should be considered as part of a wider development, in line with the NPPF and London Plan policy SD7, in a way that balances their out-of-centre status against meeting residents' needs for a variety of goods and services.</p>

		<p>The positive approach to the asset management of existing out of centre retail parks is evident from development management planning history, where the Council has generally approved applications that demonstrate they do not lead to an increase in the intensity of the use on site (e.g. internal alterations, or facade amendments), that are not speculative in nature, and that pass the necessary sequential and/or impact tests. Nevertheless, these locations remain an out of centre retail and leisure destination, which the Council must continue to manage in a way which protects the vitality and viability of Newham's existing town centres and its other retail and leisure commitments, in line with the NPPF and the London Plan. We propose to clarify how we balance these objectives, through the following modification, which will be presented to the examiner for their consideration:</p> <p>Policy HS3.1 implementation text:</p> <p>Elsewhere, the town centre first principles of the NPPF apply and loss of retail (Ea), restaurants and cafes (Eb) and service (Ec) uses in undesignated areas will be supported. For sites in out of centre retail parks that are not covered by a site allocation, the loss should lead to additional industrial floorspace as per Local Plan Policy J1. In most other instances, residential development opportunity of the site should be optimised in line with Local Plan Policy D3, unless directed otherwise by policies in this Plan.</p> <p><b>While the council supports the loss of retail and leisure in out of centre locations towards other uses compatible with the spatial strategy of the Local Plan, the Council also recognises that established retail parks in the Beckton area help to meet existing, often specialist retail needs. The Council may accept proposals for the asset management of existing retail parks that meet relevant quality criteria set out in this Plan and that:</b></p> <ul style="list-style-type: none"> <li>• <b>Demonstrate optimisation of the existing built form (e.g. through introduction of a mezzanine or other internal alterations) for the benefit of specific occupier(s); and</b></li> </ul>
--	--	---

	<p><b>Impact assessment threshold</b> The Silvertown Partnership LLP argued that the impact assessment threshold is set too low at 300sqm, significantly below the national threshold.</p> <p><b>Use of conditions/obligations to secure a Vacancy Prevention Strategy and/or a Marketing Strategy</b> The Silvertown Partnership LLP argued that it would be too onerous to also require the submission and approval of a Vacancy Prevention Strategy and/or Marketing Strategy for development that has passed the sequential test and impact test.</p> <p><b>Use of conditions to limit Use Class flexibility</b> The Silvertown Partnership LLP argued that the use of conditions to limit flexibilities in use class should not be directed through policy, arguing that greater flexibility is</p>	<ul style="list-style-type: none"> <li>• Pass relevant retail and/or leisure sequential and impact tests set out in this policy, which take into consideration the vitality and viability of all town centres that may be affected, any local centres within Newham that are within a 15min walking distance of the site, and relevant retail and/or leisure permissions.</li> </ul> <p><b>Impact assessment threshold</b> A change to this policy approach has not been made. We did not consider this change to be necessary, as the setting of a locally-appropriate threshold is supported by the NPPF and the London Plan, and the Retail and Leisure Study (2022) has recommended that the threshold should remain at 300sqm GIA in order to protect the vitality and viability of Newham's local centres. This has been a long-standing policy approach for Newham, which is working well, as demonstrated by the Retail and Leisure Study (2022) and policy monitoring.</p> <p><b>Use of conditions/obligations to secure a Vacancy Prevention Strategy and/or a Marketing Strategy</b> A change to this policy approach has not been made. We did not consider this change to be necessary, as the approach taken for the requirement of a Vacancy Prevention Strategy and a Marketing Strategy under HS3 is consistent with the approach taken to managing in-centre development, so that impacts can be managed holistically and consistently across the borough.</p> <p><b>Use of conditions to limit Use Class flexibility</b> A change to this policy approach has not been made. We did not consider this change to be necessary, as the changes would undermine the Council's ability to positively plan for the long term vitality and viability of its designated town centre network. The policy provides clarity on the</p>
--	--	---

	<p>needed in order to support a thriving evening and night time economy in Silvertown.</p>	<p>approach that the Council is already taking to managing the long term impact of edge of centre/out of centre retail (Ea), restaurants and cafes (Eb) and services (Ec) uses through limiting use class flexibilities. Which changes of use under permitted development or the use class order will be deemed appropriate for an edge of centre or out of centre site to retain, will be a matter negotiated on a case by case basis, and the policy allows for this flexibility.</p>
<p><b>HS4: Market and events/pop-up spaces</b></p>	<p><b>General support</b> Get Living Plc expressed support for this policy.</p> <p><b>Queens Market</b> Friends of Queen's Market has expressed concern with regards to policy HS4.1 being effective at protecting Queen's Market in the event of redevelopment. They argued for a number of the market's features to be specifically stated and protected in the policy, for securing community engagement as part of the process, and for recognising the social and economic value of the market.</p>	<p><b>General support</b> Support noted.</p> <p><b>Queens Market</b> The primary objective of policy HS4.1 is to protect the viability and vitality of all existing markets within Newham. The policy is therefore necessarily broader than the specific context of Queen's Market, and market-specific context will be taken into consideration as and when planning applications are submitted. The policy is positively prepared and justified by the findings and recommendations of the Retail and Leisure Study (2022), and the approach is supported by Newham's Markets Team.</p> <p>The engagement of stakeholders in development proposals is addressed through the requirements of policies BFN2 and D1, and there is no need to introduce further engagement policy requirements in this circumstance, as the plan is applied in the round.</p> <p>However, the Council recognises the importance of ensuring the Plan is effective and clear, and has therefore made the following wording change to the implementation section of policy HS4.1, which is included in the modification table.</p> <p>The modification made to policy HS4.1 implementation is:</p>

		<p>[New starting paragraph]  <b>A pitch is defined as a 3 by 3 meters area, unless otherwise agreed with the Council, in consultation with its Markets operations team.</b></p> <p>A further modification, which will be presented to the examiner for their consideration has been drafted to policy BFN3.2 implementation to recognise and support the health and social value potential of markets. Please see Policy SI1 section. If the modification is taken forward by the Inspector, for consistency, modifications are also required to the implementation sections 1 and 3 of policy HS4.</p> <p>The resulting modification proposed to policy HS4.1 implementation is:</p> <p>Any redevelopment of or adjacent to a market will be used as an opportunity to rectify any existing poorly functioning physical aspects of the market (e.g. entrances, layout, visitor circulation, quality of materials and servicing layouts). <b>This should be responsive to the social and health value of the market, as assessed against the Health and Social Value Impact Screening Assessment requirement of Local Plan Policy BFN3, alongside any other planning matter relevant to the application.</b></p> <p>and to policy HS4.3 implementation is:</p> <p>[insert new paragraph after second paragraph]  <b>Applications for permanent new markets will be assessed against the Health and Social Value Impact Screening Assessment requirement of Local Plan Policy BFN3.2, and emerging recommendations for optimising positive impacts should be incorporated into the Market Management Plan.</b></p> <p>The Pop-ups and Markets Management Plan submitted should address [...]</p>
<b>HS5: Visitor Evening and</b>	<b>General support</b> Hadley Property Group expressed support for the policy.	<b>General support</b> Support noted.

<b>Night Time Economy</b>	<p><b>Silvertown Local Centre</b></p> <p>The Silvertown Partnership LLP and the Royal Docks Team have argued that this emerging local centre should be supported to become an evening and night time economy destination. These comments were a repeat of their Regulation 18 comments.</p>	<p><b>Silvertown Local Centre</b></p> <p>A change to this policy approach has not been made. As responded in the Regulation 18 Local Plan Consultation Report, an Evening and Night Time Economy Zone for Silvertown Local Centre was considered as an option in the Integrated Impact Assessment, but not taken forward for the following reasons. Firstly, Silvertown Local Centre is recommended to retain a Local Centre scale following assessment of need through the Retail and Leisure Study (2022), and there is no further evidence to suggest a larger town centre designation would be appropriate in this location under current needs and commercial property market conditions. Secondly, the Royal Docks area does not benefit from sufficient night time public transport, with the DLR not operating as an all-night service and only one night bus servicing the south of the eastern part of Royal Docks, between North Woolwich and Connaught Bridge only. Silvertown is allocated in the Plan to function as a Local Centre, and may develop an evening and night time offer commensurate with this designation.</p>
<b>HS6: Health and wellbeing on the High Street</b>	<p><b>Control of gambling premises</b></p> <p>Betting Shop Operations Limited has argued that the proposed spatial control criteria in relation to betting shops is not justified and is overly restrictive, potentially leading to detrimental impacts to the high street and district centres. Councillor Susan Masters has argued that the controls are welcomed and queried whether the policy can be strengthened to address the significant existing concentrations in the borough.</p>	<p><b>Control of gambling premises</b></p> <p>A change to this policy approach has not been made. We did not consider this change to be necessary as the Plan provides a justified, positive and proportionate approach to managing the impacts associated with high concentrations of gambling premises, which does allow for new premises to be established where the criteria of the policy are met. The policy has been operating successfully as part of the existing Local Plan, and the evidence base, including the Retail and Leisure Study (2022) recommendations and authority monitoring reports, supports the continuation of the policy approach.</p> <p>The proliferation of betting shops, alongside other types of gambling premises, continue to be a significant concern for residents and elected members in the borough. However, the planning system cannot be applied retrospectively.</p>

	<p><b>Control of hot food takeaways</b></p> <p>Councillor Susan Masters argued that the controls are welcomed and queried whether the policy can be strengthened to address the significant existing concentrations in the borough. Similarly, two residents expressed concern with the extent of existing takeaways in the borough.</p> <p>The Silvertown Partnership LLP argued that the policy should support a small provision of takeaways as part of the offer of new strategic sites.</p>	<p><b>Control of hot food takeaways</b></p> <p>A change to this policy approach has not been made. We did not consider this change to be necessary as the Plan provides a justified, positive and proportionate approach to managing the impacts associated with high concentrations of hot food takeaway premises, which does allow for new premises to be established where the criteria of the policy are met. The policy has been operating successfully as part of the existing Local Plan, and the evidence base, including the Retail and Leisure Study (2022) recommendations and authority monitoring reports, supports the continuation of the policy approach.</p> <p>Hot food takeaways are not considered to be essential for the vitality and viability of Newham's town and local centres, and therefore there is no need to promote them on strategic sites. The suitability of hot food takeaways in Silvertown will be assessed against the policy criteria through development management processes.</p> <p>We recognise that the proliferation of hot food takeaways continue to be a significant concern for residents and elected members in the borough. However, the planning system cannot be applied retrospectively.</p>
<b>HS7: Delivery-led businesses</b>	<p><b>General support</b></p> <p>Transport for London and One Newham expressed support for the policy.</p>	<p><b>General support</b></p> <p>Support noted.</p>
<b>HS8: Visitor accommodation</b>	<p><b>General support</b></p> <p>Redefine Hotels Portfolio IV Ltd expressed support for the policy.</p> <p><b>Consistency with London Plan Policy E10</b></p>	<p><b>General support</b></p> <p>Support noted.</p> <p><b>Consistency with London Plan Policy E10</b></p>



	<p>THESET LTD argued that the spatial strategy set out by the policy is not consistent with the approach set out in London Plan Policy E10, arguing that the London Plan policy provides for an exclusion from the sequential test for the development of visitor accommodation in opportunity areas.</p> <p><b>Spatial strategy to respond to demand for hotels</b>  THESET LTD argued for hotels to be supported as part of Opportunity Areas more broadly. The Royal Docks Team and The Silvertown Partnership LLP asked for a greater degree of flexibility in determining the area around the Excel Centre which would be considered suitable for location of new visitor accommodation. The Silvertown Partnership LLP further asked for a similar approach to be taken to positioning hotels to support London City Airport. Manor Park Business Association sought support for boutique type of hotels in Manor Park</p>	<p>The comment you have provided has not resulted in a change. We did not consider this change to be necessary as the Local Plan provides a positive and effective framework for meeting demand for hotels in the borough. Visitor accommodation is a main town centre use under the NPPF, and is therefore guided by the 'town centres first principles'. We do not agree with the interpretation provided of Policy E10 of the London Plan. While supporting the potential of Opportunity Areas as suitable for visitor accommodation growth, this policy also refers to policy SD7 in terms of the management of the town centres network, which sets out that main town centre uses would be directed sequentially, to town centres first, in line with the national approach. Policy E10 therefore does not exclude visitor accommodation from undertaking a sequential test when the proposal is not located in a town centre, even if is part of an opportunity area. The Council considers that the spatial strategy set out in the policy is consistent with the NPPF and the London Plan, and note the GLA have not raised any concerns regarding this policy.</p> <p><b>Spatial strategy to respond to demand for hotels</b>  The comments provided have not resulted in a change. We did not consider a change to be necessary as the Local Plan provides a positive and effective framework for meeting demand for hotels in the borough, in a way which aligns with the NPPF and the London Plan on supporting the local visitor economy, while also balancing other needs, particularly for housing, as stated in the justification section of policy HS8. Newham forms part of the wider London tourism market, and the evidence for further growth and resulting London-wide visitor accommodation gross room demand is set out in the evidence to the London Plan. Until such time as a new study is published by the GLA, the 'Projections of demand and supply for visitor accommodation in London to 2050' (2017) provides the growth framework for Newham. It sets out that the projected net demand for visitor accommodation rooms in Newham (including the LLDC area) between 2015 and 2041 is 3,031. Between 2015-2023, a total of 2,192 rooms have been</p>
--	--	--

		<p>completed, with a further 1,085 rooms in the pipeline, as set out in the published Newham and LLDC monitoring reports. However, the Council notes that Newham has seen high demand for hotels development in recent years, at a time when the borough is also providing the highest level of temporary accommodation in the country, a proportion of which is provided in hotel or bed and breakfast accommodation.</p> <p>With substantial development in town and local centres planned over the Local Plan period, including in the Royal Docks and Stratford areas, the Council considers that the spatial strategy and overall approach to delivery of further visitor accommodation in the borough is justified and proportionately balanced against other competing needs, particularly general needs housing.</p> <p>However this policy's approach to managing demand for hotels can be more clearly set out in the implementation, to better coordinate with policy H1 and clarify how demand for hotels will be balanced with the need for general housing. The Council therefore will make the following clarification modifications to the implementation and justification texts of HS8, which are included in the modifications table.</p> <p>The modification made to policy HS8 justification is:</p> <p><b>However, the delivery of visitor accommodation must be balanced against need for other forms of development, not least housing. Newham has seen high demand for hotels development in recent years, at a time when the borough is also providing the highest level of temporary accommodation in the country</b> [add footnote reference to <b>Trust for London, <a href="#">Housing and homelessness</a> (2024)</b> hyperlinked]. <b>Given the housing crisis, homeless households are at times placed temporarily in hotels or bed and breakfast accommodation, which are not suitably designed to meet day to day living needs for longer periods of time and can lead to significant health and wellbeing problems when people are required to wait a long time for</b></p>
--	--	---

		<p>suitable permanent accommodation. The Council has therefore taken a proportionate approach as part of this policy, seeking to balance visitor accommodation demand with the high need for general needs housing in the borough, in line with the approach set out in policy H1.3 of this Local Plan. The London Plan (2021) estimates that London will need to build an additional 58,000 bedrooms of serviced accommodation by 2041, delivered primarily within the Central Activity Zones, but also increasingly in town centres more broadly. The study allocates a share of the need to Newham equating to 5.2 per cent or 3,031 net rooms. Latest monitoring indicates that <del>1,373</del> <b>2,192</b> rooms have already been delivered, with a further <del>483</del> <b>1,085</b> in the pipeline as of 2022/23. The policy therefore requires market demand testing <b>that reflects Newham's economic growth and tourism demand</b>, to ensure there is not an over delivery of visitor accommodation and land is protected for other priority uses.</p> <p>The modification made to policy HS8.2 implementation is:</p> <p><del>Where the demand justifies an edge of centre or out of centre locations as per the criteria above, a Sequential Test will also be required in line with the NPPF. [remove duplication of HS8.1 implementation and replace with]</del></p> <p><b>When reviewing evidence of market demand for new or intensified visitor accommodation, the council will take a balanced view with regards to the demonstrated demand at the location compared to the pipeline of visitor accommodation in the borough and any Newham-specific share of change in gross room demand set out as part of the London Plan evidence base. Where the Council deem that needs are already being met through the pipeline, granting permission for visitor accommodation proposals that do not meet the spatial strategy of this plan, including the prioritisation of sites for housing set out in H1.3, will rarely be justifiable.</b></p> <p><b>Where existing visitor accommodation capacity is taken up by people owed a homelessness duty, by Newham or any other public sector body, this should be clearly set out in the demand study and should be</b></p>
--	--	--

		discounted towards the evidence of demand for further visitor accommodation.
<b>Social Infrastructure</b>		
<b>SI1: Existing community facilities and health facilities</b>	<p><b>General support</b> This policy approach was broadly supported by one housing association (Southern Housing), one developer (Hadley Group), one community group (Bonny Downs Community Association), NHS Property Services and Newham Sixth Form College. West Ham United Football Club generally supported Policy SI1 but wanted the stadium to be recognised through a site allocation.</p> <p><b>Approach to the loss of social infrastructure</b> One resident and one developer (Beckton Development Limited) raised concern with clause 1a, stating that it could provide an opportunity to lose a community facility without the need to demonstrate evidence of lack of need or marketing under part b or the consideration of alternative community facilities.</p> <p><b>Placing an additional burden on community facilities</b></p>	<p><b>General support</b> Support for the policy is welcomed. The West Ham United Football Club site and information provided did not meet the requirements set out in the Site Allocation and Housing Trajectory Methodology Note for inclusion as a site allocation. This does not prevent development or change occurring on the site. Any application would be assessed against the policies in the adopted Local Plan. The Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>Approach to the loss of social infrastructure</b> A change to this policy approach has not been made. We did not consider this change to be necessary as we disagree with this interpretation of Policy SI1. The policy protects existing community facilities and health facilities, as set out in SI1.1, existing facilities will be protected and should not be lost to other uses, reconfigured, reduced in size or relocated unless it can be demonstrated that the criteria, set out in clauses 1a or 1b, are met. Only if the loss of a facility can be demonstrated as being acceptable then the preferred alternative use will be for the maximum viable amount of affordable housing (unless located in a Primary Shopping Area, Strategic Industrial Location or Local Industrial Location). This approach is therefore considered to be effective and in conformity with the NPPF and the London Plan. The Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>Placing an additional burden on community facilities</b></p>

	<p>One resident raised concern, in relation to church facilities, that the policy could unfairly protect unsustainable community uses. The same resident raised concerns with clause SI1.1 b.ii, which requires applicants to provide evidence that the facility has been actively marketed for social infrastructure use for at least 12 months. They were concerned that it is unlikely that a church, required to serve mostly people living mostly in its neighbourhood, would be marketable.</p> <p><b>Need for affordable community space</b> One community group (PEACH) stated a need to protect existing community space. Three community groups (PEACH, Bonny Downs Community Association and One Newham) set out the need for affordable community facilities.</p> <p><b>Need for healthcare facilities</b></p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as Policy SI1 is intended to protect the users of existing community facilities, such as churches. However, as set out in SI1.1, community facilities can be lost to other uses, reconfigured, reduced in size or relocated if it can be demonstrated that the criteria, set out in clauses 1a or 1b, are met. Provided it could be demonstrated that the criteria met, development of an existing church could offer a different type of community facility to that provided on-site currently.</p> <p>Depending on the proposal, a community facility, such as a church, may need to be actively marketed for social infrastructure use, not necessarily a church, for at least 12 months. This is type of protection, towards existing community facility uses, is a recognised policy approach in Local Plans and is in accordance with the requirements of the NPPF (2023, para.97) and London Plan (Policy S1) (2021). The Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>Need for affordable community space</b> A change to this policy approach has not been made. We did not consider this change to be necessary as the Council's objective for policies SI1, SI2 and SI3 is to protect the community spaces needed to support Newham's residents and to support new facilities coming forward which meet the needs of their users. Policy SI2 has specific requirements, set out in clause 7, for ensuring new community space meets the needs of its users, including the need for a Social Value-Health Impact Assessment which will address a facilities affordability. The Council is satisfied that the plan is sound without the proposed changes.</p> <p><b>Need for healthcare facilities</b></p>
--	--	--

	<p>One Councillor raised the need to fund and deliver healthcare facilities to meet the need arising from the projected population growth over the Plan period.</p> <p><b>Loss of social infrastructure and provision of affordable housing</b> NHS North East London Integrated Care Board and other NHS bodies wanted NHS facilities to be exempt from clause 2 of the policy. This clause requires, if the loss of social infrastructure is deemed by the Council, to be acceptable,</p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the Council has worked collaboratively with NHS partners throughout the Local Plan Review to plan for future healthcare needs, in line with the requirements of the London Plan and the NPPF. Information submitted by North East London ICB (formerly CCG) at each stage of the Local Plan consultation process has informed the development principles and infrastructure requirements in the site allocations, as set out in the Site Allocation and Housing Trajectory Methodology Note (2024).</p> <p>Additionally, Policy SI2 sets out that new, expanded and improved health facilities, will be supported where it is demonstrated that there is unmet demand which will not be met by any planned delivery. The implementation text to Policy SI2 states that the Local Plan neighbourhood policies and relevant site allocations set out where future health facilities are required. Applicants are encouraged to consult the relevant health partners in Newham (Barts Health NHS Trust, North East London NHS Foundation Trust, Health and Care Space Newham, HUDU) early in the development process to understand what type of health facility is needed and when it is required to be operational. The Planning Obligations for Policy SI2 set out that contributions may be secured from residential development which generates additional demand for community facilities and health facilities (using the London Healthy Urban Development Unit Planning Contributions Model) but where a new facility is not being delivered on site. The Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>Loss of social infrastructure and provision of affordable housing</b> Comment noted. This comment has been subject to further discussion with NHS North East London Integrated Care Board and other NHS bodies and a satisfactory resolution has been found. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report. Both parties are satisfied that the plan remains sound without these changes.</p>
--	---	---

	<p>applicants to provide the maximum viable amount of affordable housing.</p> <p><b>Markets – providing an important space for community interaction</b></p> <p>The Friends of Queen’s Market wished for markets to be added to the Local Plan definition of community facilities and expressed concern that their value, as important spaces for social interaction, was not being recognised or their use protected.</p>	<p><b>Markets – providing an important space for community interaction</b></p> <p>A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan addresses markets in Policy HS4: Markets, pop-ups and meanwhile uses. The Council is satisfied that the plan is sound without the proposed changes.</p> <p>However, the Council recognises the importance of ensuring the Plan adequately protects markets and the value these spaces actively contribute to supporting community wealth building, through providing opportunities for existing and new traders, as places for social integration and interaction, as well as vibrant spaces for commerce that positively support the offer and vitality of the high streets they are located in. Therefore, the Council proposes to address these concerns by proposing an amendment to Policy BFN3: Social Value and Health Impact Assessment - delivering social value, health and wellbeing.</p> <p>The objective of the SV-HIA tool is to support the delivery of a built and natural environment that delivers social value for Newham residents and supports their good physical and mental health, and social wellbeing. The Council has drafted the following modification, which will be presented to the examiner for their consideration, to Policy BFN3:</p> <p>The following developments will be expected to submit a Health and Social Value Impact screening assessment:</p> <ul style="list-style-type: none"> <li>i. Major development</li> <li>ii. Loss, gain or reconfiguration of social infrastructure floorspace</li> <li>iii. New takeaways, water pipe smoking and other kinds of smoking leisure activities, gambling premises and payday loan shops</li> <li>iv. Loss, gain or reconfiguration of publicly accessible green space</li> </ul>
--	--	--

	<p><b>Sequential test for social infrastructure</b> One resident and one developer (St William Homes LLP) objected to the need for a sequential test for new social infrastructure.</p> <p><b>Social Value-Health Impact Assessment</b> One community group (One Newham) raised a concern with the requirement for a Social Value-Health Impact Assessment, stating that it may stifle growth.</p>	<p><b>v. Development impacting an existing or creating a new internal or external permanent market</b></p> <p><b>Sequential test for social infrastructure</b> A change to this policy approach has not been made. We did not consider this change to be necessary as Policy SI2 is intended to ensure convenient access to community and health facilities, as this allows a range of people to easily use the services they need. This means that it may be acceptable for some smaller facilities and those with a local user base to be located outside of a designated Town or Local Centre. In these cases, the users of the facility should be able to easily access the facility by foot or sustainable transport methods.</p> <p>Clause 3 of Policy SI2 allows a greater flexibility, than the adopted Local Plan (2018) with regard to the location of small scale social infrastructure (smaller than 1,000 sqm GIA). This makes it easier for small scale social infrastructure to locate outside of a Town or Local Centre where prices are recognised as generally being higher than out-of-centre locations. This was a change from the Regulation 18 Local Plan, which had required applicants to undertake a sequential test within the list. We maintain that encouraging facilities to be located in either a Town or Local Centre is useful as it enables the creation of hubs which encourages use and prioritises areas which are under provided for with regard to community facilities. The Council is satisfied that the plan is sound without the proposed changes.</p> <p><b>Social Value-Health Impact Assessment</b> A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the policy to be positively prepared because Policy BFN3 addresses the need to achieve sustainable development, as set out in the IIA. It is considered that the policy takes a</p>
--	--	--



	<p>proportionate approach to the need to undertake a Social Value-Health Impact Assessment (SV-HIA).</p> <p>The accompanying Social Value-Health Impact Assessment Guidance Note and Social Value-Health Impact Assessment Screening Tool set out a proportionate approach to the size, location and type of development that is required to undertake a SV-HIA. The Council is satisfied that the plan is sound without the proposed changes.</p> <p><b>Quality of evidence base</b>  Comment noted. We acknowledge that a study such as the Community Facilities Needs Assessment (2022) can only ever provide a snapshot in time about the provision of the particular types of social infrastructure. The need for certain types of social infrastructure will naturally change over time. This is the first time such a study has been undertaken and we acknowledge it is not, nor can it ever be a full and perfect picture of the intricacies of community facility provision. What it has done is sought to better understand, protect and guide the future development of Newham’s social infrastructure.</p> <p>This baseline mapping can be used to consider the network of spaces within a neighbourhood – demonstrating where in the borough there is a wide range of community facilities and where doesn’t – and to look at the provision of individual types of community facilities to understand where there are gaps. It has therefore provided a baseline against which developers and providers can consider what is most needed, alongside a requirement to undertake updated mapping and thorough engagement.</p> <p>The implementation text to Policy SI1 clearly sets out that Appendix B of the Community Facilities Needs Assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. As such, applicants are encouraged to speak</p>
--	--

		<p>with the council early in the development process to understand what evidence is required in an assessment to demonstrate if a particular facility is surplus to current and future needs. Applicants must also demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community.</p> <p>The implementation text to support Policy SI2 also clearly sets out that Appendix B of the assessment provides a starting point for applicants, to help understand if the proposal falls in an area with an existing need for a community facility. Applicants are also required to provide up to date spatial mapping of the facilities in the borough's network of well-connected neighbourhoods. This mapping exercise must identify the development site location in the context of the 15 minute network of all relevant social infrastructure. In addition, applicants are required to demonstrate recent and relevant engagement with ward members, the Resident, Engagement and Participation team, community managers and the local community to understand existing provision and local need for the proposed facility.</p> <p>The Council is satisfied that the plan is sound without the proposed changes.</p>
<b>SI2: New and re-provided community facilities and Health facilities</b>	<p><b>General support</b> This policy approach was broadly supported by Sport England, two developers (Hadley and Silvertown Partnership and Newham Sixth Form College,</p> <p><b>Re-provision and modernisation of existing places of worship</b> One resident raised concern that the policy would prohibit the upgrading of church buildings due to their location outside of a designated town or local centre.</p>	<p><b>General support</b> Support for the policy is welcomed.</p> <p><b>Re-provision and modernisation of existing places of worship</b> A change to this policy approach has not been made. We did not consider this change to be necessary as we disagree with your interpretation of Policy SI1 and SI2. The policy protects existing community facilities, such as churches, as set out in SI1.1, existing facilities will be protected and should</p>

	<p><b>Speculative community facilities</b> One developer (Hadley) objected to clause 4, which states that speculative social infrastructure development will not be supported and requests flexibility as the local community grows with the large growth of development in the area. The Newham Muslim Burial Association sought clarity around what this clause was trying to achieve.</p> <p><b>Need for facilities to meet the needs of those with Muslim faith, with a specific need for larger places of worship</b> A large number of residents stated that the Local Plan needed to better reflect the diverse faith community in Newham and meet its varying needs and characteristics.</p>	<p>not be lost to other uses, reconfigured, reduced in size or relocated unless it can be demonstrated that the criteria, set out in clauses 1a or 1b, are met.</p> <p>Clause 6 of Policy SI2 states that re-provision (including modernisation and/or expansion) of a facility outside of an existing town or local centre will be supported on the existing site where:</p> <ul style="list-style-type: none"> <li>a. it can be demonstrated it is of a similar user footfall and catchment to the existing facility; and</li> <li>b. there are no unacceptable transport and highways impacts; and</li> <li>c. it can be demonstrated that the scheme has been designed to be neighbourly;</li> </ul> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>Speculative community facilities</b> A change to this policy approach has not been made. We did not consider this change to be necessary as the Community Facilities Needs Assessment (2022) and the consultation undertaken with community groups as part of this work, has highlighted the downside of providing speculative community space. We do not wish to see vacant space or facilities which have been designed without considering who the end user is. A key recommendation from the CFNA (2022) was to avoid speculative community space. Community facilities often have specific design requirements, often distinct to each type. The Council is satisfied that the plan is sound without the proposed changes.</p> <p><b>Need for facilities to meet the needs of those with Muslim faith, with a specific need for larger places of worship</b> A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan is applied in the round. The</p>
--	--	---

	<p>There is a pressing need for specific types of spaces that can accommodate large funeral prayers for community members and a need for inclusive faith facilities to meet the needs of women, children, older people, and individuals with disabilities. Many of these comments were directed at site allocation N7.SA1 and the need for an improved faith facility on this site.</p>	<p>development principles section of the site allocation directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure.</p> <p>Policies SI1 and SI2 in the Social Infrastructure chapter provide the correct route for an applicant to demonstrate the specific requirements for a re-provided faith facility at N7.SA1.</p> <p>Policy SI1 of the Local Plan seeks to protect existing facilities unless it can be demonstrated they are no longer needed. Therefore, a key development principle of the site allocation is to replace the existing temporary community use with the equivalent amount of community floor space.</p> <p>Local Plan Policy SI2 directs larger new and re-provided community facilities to town and local centre locations. To reflect this, the design principles for N7.SA1 state that community facilities should be located to the south east of the site in proximity to West Ham Station and as part of Twelvetrees Local Centre.</p> <p>Policy SI2 is also relevant when considering the type and scale of any re-provision of community facility on this site. Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 1.c of Policy SI2 sets out that new, expanded and improved community facilities can be delivered, where it meets an unmet demand which will not be met by any planned delivery. Therefore, a re-provided faith facility could be provided at a larger scale on site allocation N7.SA1, provided it met the criteria set out in Policy SI2.</p>
--	---	--

		<p>Clause 7 of Policy SI2 is relevant when considering the suitability of a community facility on this site in its ability to meet the needs. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"> <li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li> <li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li> <li>• be inclusive and accessible.</li> </ul> <p>Additionally, Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA's will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population. The Council is satisfied that the plan remains sound without the proposed changes.</p>
<b>SI3: Cultural facilities and sport and recreation facilities</b>	<p><b>General support</b> This policy approach was broadly supported by Sport England, University College London and one resident.</p> <p><b>Need for sport and informal recreation and cultural facilities</b></p>	<p><b>General support</b> Support for the policy is welcomed.</p> <p><b>Need for sport and informal recreation and cultural facilities</b> A change to this policy approach has not been made. We did not consider this change to be necessary as the neighbourhood profile for N11: Beckton,</p>

	<p>The Committee of the British Stunt Register stated a need for the Local Plan to protect the East London Gymnastics Club.</p> <p><b>Lee Valley Regional Park</b> The Lee Valley Regional Park Authority wanted the justification text to support Policy SI3 to reference the wider offer that the Regional Park provided to Newham's communities.</p>	<p>highlights the gymnastics club as one of the areas community facilities. The gymnastic centre forms part of site allocation N11.SA1 East Beckton Town Centre, and it is included in the allocation's 'Existing Uses'. The 'Development principles' for this site state that: 'Development should protect and enhance existing sports and recreation facilities in accordance with Local Plan Policy SI1 and SI3'. The Council is satisfied that the plan remains sound.</p> <p><b>Lee Valley Regional Park</b> This comment has been subject to further discussion with Lee Valley Regional Park Authority and is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report.</p> <p>In light of these comments, the Council recognises the importance of ensuring the Plan reflects the qualities of the green spaces in the Lee Valley Regional Park and therefore has made the following wording change which is included in the modification table:</p> <p>3.139 Newham is home to the Queen Elizabeth Olympic Park, the London Stadium, Aquatic Centre and the Lee Valley Velopark, all of which are a lasting legacy from the 2012 Olympic Games. These are world class facilities and important national leisure and sporting venues. The Lee Valley Velopark is owned by the Lee Valley Regional Park Authority and is managed through a <del>its</del> leisure trust. Newham continues to work closely with and support the Park Authority as it seeks to improve and grow the offer, thereby ensuring its long term sustainability. <b>The Regional Park's offer for Newham's communities also extends beyond the borough boundary with a range of other venues available to residents via walking and cycling routes, such as Lee Valley Hockey and Tennis Centre, the open spaces of Hackney and Walthamstow Marshes Nature Reserve and the new Lee Valley Ice Centre in Waltham Forest, one of only three Olympic-sized twin rinks in the UK.</b></p>
--	---	---

<b>SI4: Education and childcare facilities</b>	<p><b>General support</b> This policy approach was broadly supported by Sport England, Newham Sixth Form College and one developer (St William LLP).</p> <p><b>Need for education space to meet the needs of those with Muslim faith</b> A large number of residents stated that the Local Plan needed to recognise and support the repurposing of community facilities for educational and service-oriented purposes. In addition, the Local Plan needed to recognise of the need for educational space for Islamic education, which is currently oversubscribed. Many of these comments were directed at site allocation N7.SA1 and the need for an improved faith facility on this site.</p>	<p><b>General support</b> Support for the policy is welcomed.</p> <p><b>Need for education space to meet the needs of those with Muslim faith</b> A change to this policy approach has not been made. We did not consider this change to be necessary as site allocation N7.SA1 has not been identified as being necessary or appropriately located for the provision of an education use to meet local need, as evidenced through Newham's Places for All Strategy (2023 - 2027).</p> <p>It should be noted that this would not preclude an applicant from making the case for the need for an education use on this site, where it can be demonstrated there is unmet demand which will not be met by any planned delivery. In doing so, the requirements of Local Plan Policy SI4 would need to be met.</p> <p>Policy SI2 is also relevant when considering the re-provision of a community facilities. Clause 1.c of Policy SI2 sets out that new, expanded and improved community facilities can be delivered, where it is meets an unmet demand which will not be met by any planned delivery. Therefore, a re-provided faith facility could provide an element of education space on site allocation</p>

	<p><b>Approach to education space on site allocations</b></p> <p>One developer (St William Homes LLP) wanted to amend clause 3b to introduce the need for additional evidence base to support the need for education space on a site allocations and the introduction of trigger points for release of education space if it is not needed. The same developer wanted to amend clause 3c introduce a maximum agreed size for education facilities on site allocations.</p>	<p>N7.SA1, provided it met the criteria set out in Policy SI2 and SI4 (for the education element).</p> <p>Policy SI2 clause 1.a sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery. The implementation text for Policy SI2.1 sets out the requirement for a needs-based assessment. This should demonstrate what type of facility is needed and when it is likely to be operational.</p> <p>Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities meet the needs of the local population. The SV-HIA is a practical tool for the Council and applicants to judge the potential the social value and health effects of a development. SV-HIA's will be used to assess the positive aspects of a proposal and the negative effects on different population groups. It is particularly focused on looking at how disadvantaged groups may be affected, to minimise the risks of widening inequalities. It provides the opportunity to evidence the need for a re-provided faith facility, at this site, designed to specifically meet the needs of the local population. The Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>Approach to education space on site allocations</b></p> <p>A change to this policy approach has not been made. We did not consider this change to be necessary as Policy SI4 is justified by up to date evidence base, through Newham's Places for All Strategy and our work with the Council's Education Team.</p> <p>Clause 1 of Policy SI4 requires the delivery of new schools and childcare facilities on identified site allocations, of the scale required to meet the projected need for school places. It is important to deliver schools on site allocations at the appropriate phase of the development. This is both to</p>
--	--	--



	<p><b>Higher education facilities</b></p> <p>One developer (RAD CHP Ltd) raised a concern regarding the approach to directing new higher education facilities to Newham's designated town centres or existing out of centre campus sites.</p>	<p>support the successful delivery of the new school and so as to not undermine existing schools in the neighbourhood. As set out in the implementation text to Policy SI4.3, the delivery of new education facilities on identified site allocations should provide a long-term option, up to 2038, to bring forward the facility, to allow for changes in the pupil place planning profile. Where the school will only be needed in the latter part of the Plan period then appropriate meanwhile uses should be determined for the site. The Council is satisfied that the plan is sound without the proposed changes.</p> <p><b>Higher education facilities</b></p> <p>A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the policy to be positively prepared because Policy SI4 addresses the need to achieve sustainable development by seeking to deliver new higher education facilities in Newham's designated town centres or where it can be demonstrated that development is required to improve an existing out of centre campus sites. This policy approach is to ensure convenient access to higher education facilities, allowing a range of people to easily use the services and facilities they provided either by foot or sustainable transport methods. In addition, the town centre first approach supports the vitality of our highstreets and provides students with better access to the day to day facilities they need. The Council is satisfied that the remains sound without the proposed changes.</p>
<b>SI5: Burial space and related facilities</b>	<p><b>General support</b></p> <p>This policy approach was broadly supported by the London Borough of Redbridge and Newham Burial Association.</p> <p><b>Meeting need for burial space – LB Redbridge</b></p> <p>The London Borough of Redbridge highlighted that it expected that Newham's unmet need for new burial plots</p>	<p><b>General support</b></p> <p>Support for the policy is welcomed.</p> <p><b>Meeting need for burial space – LB Redbridge</b></p> <p>Comment noted. This comment has been subject to further discussion with Redbridge and a satisfactory resolution has been found. This is set out in</p>

	<p>will continue to be largely met from sites on the edge of, or outside, Greater London and that it will not be able to meet any of Newham's unmet need for burial plots.</p> <p><b>Including Cemeteries and burial facilities in the Local Plan glossary</b> Newham Burial Association requested that Cemeteries and burial facilities should be included in the definition of ‘social infrastructure’ at Table 18 within the Local Plan Glossary.</p> <p><b>Providing burial space sites in sustainable locations</b> Newham Burial Association cautioned that new burial space, due to their nature, may need to come forward in areas which are not accessible by sustainable transport methods.</p> <p><b>Meeting need for burial space – pan-London burial space</b> Newham Burial Association commended the inclusion of Policy SI5 in the Local Plan and its objectives and supporting</p>	<p>more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report. Both parties are satisfied that the plan remains sound without these changes.</p> <p><b>Including Cemeteries and burial facilities in the Local Plan glossary</b> This need for clarification is noted. This has been rectified by making the following wording change:</p> <p>Social Infrastructure: Includes the uses described in the table below. Table 18: Social Infrastructure use types and Use Classes</p> <p><b>Burial Space (SI5)</b></p> <table><tr><td><b>Cemeteries and burial grounds</b></td><td><b>Sui Generis</b></td></tr></table> <p>which is included in the modification table.</p> <p><b>Providing burial space sites in sustainable locations</b> A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the policy to be positively prepared because Policy SI5 addresses the need to achieve sustainable development, as set out in the IIA. As such, the Policy seeks to deliver new burial space which is publically accessible and will not cause unacceptable highways impacts. As such, the implementation text sets out that sites should be accessible to residents, in particular by public transport. Applicants must submit a Transport Assessment and Travel Plan in line with Local Plan policy T3. The Council is satisfied that the plan is sound without the proposed changes.</p> <p><b>Meeting need for burial space – pan-London burial space</b> A change to this policy approach has not been made. We did not consider this change to be necessary as decisions on new burial space will be made in</p>	<b>Cemeteries and burial grounds</b>	<b>Sui Generis</b>
<b>Cemeteries and burial grounds</b>	<b>Sui Generis</b>			

	<p>text. It supported the Local Plan's recognition that different religions and cultures have differing burial needs. However, Newham Burial Association would like the policy to better address the need for burial space from across London.</p> <p><b>Meeting need for burial space – Newham's diverse religious needs</b></p> <p>Newham Burial Association supported Newham's intention to identify and seek to meet burial need and the Plan's recognition that different religions and cultures have differing burial needs was also supported. However, Newham Burial Association would like the policy to better recognise that at different cultures and religions will have different requirements and that these are not always met by existing provision, meaning that assessment of existing and new provision should take a qualitative as well as a quantitative approach.</p>	<p>accordance with Policy SI5 and London Plan Policy S7. The Council's objective for this policy approach is to ensure new burial space meets the needs of our population. It is a policy for Newham's Development Management Team to help assess planning applications in the borough. The Council is working with other boroughs to identify suitable burial space sites, this work is being led by the Environment and Sustainable Transport Team. The Council is satisfied that the plan is sound without the proposed changes.</p> <p><b>Meeting need for burial space – Newham's diverse religious needs</b></p> <p>A change to this policy approach has not been made. We did not consider this change to be necessary as clause 2 of Policy SI5 clearly sets out that new burial space development should meet the needs and requirements of Newham's population, including for those parts of the community for whom burial is the only option.</p> <p>This policy approach is further reinforced in the implementation text which states: '...new burial spaces should demonstrate they are designed to meet the needs of Newham's communities through suitable design of the plots, landscape and ancillary buildings. This should include demonstrating that the provision will address the findings of the Newham Burial Space Study and opportunities for co-design with relevant communities, undertaken early in the design process'.</p> <p>Further to this, the justification text is very clear regarding the need to recognise that different cultures and religions have different requirements, paragraph 3.147 states: '...funeral and burial practices vary widely across different religions and belief systems, with each culture and tradition having its own unique customs and rituals. Newham's diverse population means that funeral and burial provision within the borough should enable a wide range of practices. Some faiths, including Muslim and Jewish faiths do not allow burials in reused graves. As such we support the provision of additional burial space, in particular to meet the needs of Newham's</p>
--	---	--

	<p><b>Evidence base – burial space</b></p> <p>Newham Burial Association set out concerns regarding the Newham Burial Space Need and Provision Study (2024). Its view is that the study needs to better reflect qualitative need for burial space and contained inaccuracies regarding the new Gardens of Peace facility in the London Borough of Havering and the Folly Lane Muslim Cemetery extension. It also wanted the Local Plan to reference the work which had been undertaken by Newham Council to understand the need for burial space in the borough.</p>	<p>communities which cannot be met within the existing provision'. The Council is satisfied that the plan is sound without the proposed changes.</p> <p><b>Evidence base – burial space</b></p> <p>The Council's objective for this policy approach is to ensure new burial space meets the needs of our population. However, the Council recognises the importance of ensuring the Plan is clear and as such is now referring to its additional work on burial space, any future evidence base and that new space must be co-designed to ensure that local people can meaningfully input into a scheme's development. The Council has therefore made the following wording changes:</p> <p>3.147 However, funeral and burial practices vary widely across different religions and belief systems, with each culture and tradition having its own unique customs and rituals. Newham's diverse population means that funeral and burial provision within the borough should enable a wide range of practices. Some faiths, including Muslim and Jewish faiths do not allow burials in reused graves. <del>As such we support the provision of additional burial space, in particular to meet the needs of Newham's communities which cannot be met within the existing provision. As such, in order to better understand this need and consider ways it can be met, we are commissioning a</del> Newham's Burial Space Study <b>(2024)</b> and <b>Newham's Burial Space Provision and Options Appraisal Report (2025)</b> provides a local understanding of Newham's burial space needs. These studies provide an audit of the borough's existing burial space provision and <del>are which will be</del> used by other parts of the council and partners to inform future management of the existing cemeteries and to inform planning applications for new cemeteries.</p> <p>Policy S15 implementation text</p>
--	---	--

		<p>SI5.2</p> <p>Developments proposing new burial spaces should demonstrate they are designed to meet the needs of Newham's communities through suitable design of the plots, landscape and ancillary buildings. This should include demonstrating that the provision will address the findings of the Newham's Burial Space Study (2024), <b>Newham's Burial Space Provision and Options Appraisal Report (2025)</b> and any relevant future local and/or regional burial space evidence base.</p> <p>The co-design of burial space facilities ensures that local people can meaningfully input into a scheme's development. Applicants are therefore encouraged to engage early in the development process with ward members, the Resident, Engagement and Participation team, community managers, the local community and intended users of the facility. <del>and opportunities for co-design with relevant communities, undertaken early in the design process</del></p> <p>Which is included in the modification table.</p>
<b>Inclusive Economy</b>		
<b>J1: Employment and growth</b>	<p><b>General support</b></p> <p>The Silvertown Partnership LLP indicated support for the overall policy objective. The GLA, Thames Water and developers supported the general approach to employment sites, including SIL2 British Gas/ Cody Road, SIL5 Beckton Riverside, SIL6 Bow Goods Yard, LIL4 Rick Roberts Way North and LIL7 Beckton Gateway, as well as the land swap at Bidder Street. Network Rail, Thames Water and St William Homes LLP supported the priority uses on Strategic Industrial Locations including SIL6 Bow Goods Yard and SIL5 Beckton Riverside. IQL Office LP supported the inclusion of</p>	<p><b>General support</b></p> <p>Support noted.</p>

	<p>research and development floorspace in the Metropolitan Centre.</p> <p><b>Approach to industrial land</b> The GLA requested the prioritisation of Class B over Class E uses on industrial land since it can be controlled and monitored by the Council. They requested this approach to be applied to the new SIL designation at Bidder Street and Sugar House Lane LSIS. The Port of London Authority requested more explicit wording to reflect the safeguarding status of the wharves on SIL3 Thameside West and SIL4 Thameside East.</p>	<p><b>Approach to industrial land</b> No change was made regarding the safeguarded wharves as references to these wharves are already made in Policy J1 as priority employment uses at relevant employment sites.</p> <p>Modifications have been made to strengthen the Council's ability to control and monitor Class E industrial floorspace in response to the GLA's comment.</p> <p>The modifications made are: J1.2 Implementation: <b>All future developments incorporating office (E(g)(i)), research and development (E(g)(ii)) and/or light industrial (E(g)(iii)) floorspace within SILs, LILs, and where necessary and justified within site allocations identified for mixed use or employment-led development will be secured through conditions to limit uses consented within Class E, in order to achieve the objective of this policy.</b></p> <p>Further information on each spatial designation is available in the Employment Land Review (2022) (or subsequent updates) and applicants are expected to discuss their proposals with the council at the earliest opportunity to ensure that they align with the function, character and priority uses of their proposed location.</p> <p>J3 Implementation (All): <b>Proposals incorporating the replacement and relocation of floorspace within office (E(g)(i)), research and development (E(g)(ii)) and/or light industrial (E(g)(iii)) will be secured through conditions to limit uses consented within Class E, under the following circumstances:</b> - the floorspace to be relocated or replaced is within a SIL or LIL; or - the replacement and relocated floorspace is within a SIL or LIL; or</p>
--	---	--

	<p><b>Approach to out-of-centre retail parks</b> B&amp;Q Limited objected to the approach of directing employment uses to out of centre retail parks due to retail supply concerns.</p>	<p>- the floorspace to be relocated or replaced is located within a site allocation and the relocation and replacement is considered necessary or justified.</p> <p>Monitoring Framework - Key performance indicator 22:</p> <p>Target no net loss of floorspace.</p> <p><del>Monitor for location against designated employment land and non-designated employment sites.</del></p> <p><del>Monitor approvals (gains and loss) and completions.</del></p> <p><b>Monitor for net change in Use Class B (including general industrial (B2), storage or distribution (B8) (including dark kitchen/ shop and micro fulfilment)), industrial-related Use Class E (including research and development (E(g)(ii)) and light industrial (E(g)(iii))) and office (E(g)(i)) floorspace approved (gains and loss) and completed on Strategic Industrial Locations (SILs), Local Industrial Locations (LILs), site allocations and other non-designated employment sites.</b></p> <p>This comment has been subject to further discussion with the GLA. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report.</p> <p><b>Approach to out-of-centre retail parks</b> The objective of this policy is to support the delivery of further industrial land, while retaining a town centre first approach, to address the needs identified in the Employment Land Review 2022 and Retail and Leisure Study 2022. However, the Council recognises the importance of ensuring the Plan is clear in its intended application of policy for the management of out of centre retail parks, and has therefore has drafted a modification, which will</p>
--	---	--

	<p><b>Allowing residential uses on employment land</b> The LLDC and a number of developers requested residential uses be allowed at SIL3 Thameside West, SIL5 Beckton Riverside, LMUA1 Silvertown Arches, LMUA 9 Canning Road West, LMUA 6 Ashburton Terrace and LIL 6 Grantham Road. The Home Builders Federation objected to the policy of restricting residential uses on Local Industrial Locations and Local Mixed Use Areas.</p> <p><b>Definition of terms</b> IXDS, SEGRO and the Royal Docks team requested clearer definitions for terms including employment-led development, green/low carbon industries and creative and cultural uses.</p>	<p>be presented to the examiner for their consideration, to policy HS3.1 implementation text.</p> <p><b>Allowing residential uses on employment land</b> No changes have been made as these sites are designated for industrial intensification or protection of existing industrial capacity. Employment-led co-location with residential development is supported on most of the Local Mixed Use Area. This follows the finding in the Employment Land Review (2022), which concluded that the pipeline of industrial supply is not sufficient to meet demand, and that all industrial land must be protected and optimised solely for industrial use. While sites with planning permission for residential use can still be built out, the permission does not alter our approach to or the boundary of the employment designations. Any release of the employment capacity for residential use on designated employment land will be harmful to the borough's industrial land supply. The Council considers the Plan sound without the proposed changes.</p> <p><b>Definition of terms</b> Modifications have been made to improve clarity of the definition of employment-led development.</p> <p>The modifications made are: J1 Implementation Text: Employment-led development is required to first meet employment needs (including the viable operation of employment uses on the site and where relevant, adjacent sites) in any design, and then other uses such as residential can be fitted around it. <b>Employment-led development can consist of employment only development but must still demonstrate that the employment needs at the site are being met.</b></p>
--	---	--



	<p><b>Digital and data development</b> IXDS and GLP requested a more explicit reference to data centres as an acceptable use on Strategic Industrial Locations and Local Industrial Locations, and as a priority use on SIL3 Thameside West and LMUA12 Bidder Street to reflect the permitted data centre developments. They also requested an explicit reference to data centres as Use Class B8 in the policy.</p> <p><b>Non-employment land uses</b> Redefine Hotels Portfolio IV Ltd requested more explicit wording in the policy to support main town centre uses in major and district centres, and site allocations. The Royal Docks team requested visitor accommodation use be</p>	<p>Glossary: Employment-led development: Employment-led development requires schemes to first meet employment needs (including the viable operation of employment <del>generating</del> uses on the site and where relevant, adjacent sites) in any design, and then other uses such as residential to be fitted around it. <b>Employment-led development can consist of employment only development but must still demonstrate that the employment needs at the site are being met.</b></p> <p>The other terms are already clearly defined in the Glossary, so no further changes are considered necessary.</p> <p><b>Digital and data development</b> No changes have been made as the priority uses included in Policy J1 reflect the priority uses identified through the Employment Land Review 2022. The delivery of data and digital growth is already covered in Policy W4, the Inclusive Economy Policies and relevant Neighbourhood Policies. Data centres are considered an employment use and proposals will be subject to requirements as set out in the Inclusive Economy Policies as well as any other relevant policies in the Plan.</p> <p>While data centres are currently widely accepted as Use Class B8, its use class classification is subject to wider scrutiny and may change over the plan period. The Council considers the Plan sound without the proposed changes.</p> <p><b>Non-employment land uses</b> No changes have been made as the Plan directs economic development to appropriate employment sites, town centres and site allocations in order to support the delivery of the identified need for further industrial land, while retaining a town centre first approach, as supported by the Employment Land Review 2022 and Retail and Leisure Study 2022. The requirements for</p>
--	--	---

	<p>allowed at LMUA1 Silvertown Arches. Sports England requested sports uses be considered as an employment use.</p> <p><b>Requirement for economic strategy submission requirement</b> The Silvertown Partnership raised concerns that the requirement for an Economic Strategy on all developments will limit investment in the borough.</p>	<p>the provision of main town centre uses including visitor accommodation are covered in the High Street Policies and are included in relevant site allocations. Policy J1 was already amended in the Regulation 18 Local Plan to cross reference Policy HS1. Regarding sports uses, Policy SI3 already provides a strong approach to delivering new leisure facilities of the type needed in the right locations as informed by the Built Leisure Needs Assessment. The Council considers the Plan sound without the proposed changes.</p> <p><b>Requirement for economic strategy submission requirement</b> Policy J1 was already amended in the Regulation 18 Local Plan to provide greater clarity on the requirements including threshold and scope of the Economic Strategy in response to this comment during the Regulation 18 consultation. It is not considered that any further changes are required.</p>
<b>J2: New employment floorspace</b>	<p><b>General Support</b> Ballymore supported the approach to co-location on specific site allocations.</p> <p><b>Industrial Intensification on SILs and LILs</b> The GLA broadly supported this approach but requested a more proactive approach to intensify sites with greater potential for intensification.</p>	<p><b>General Support</b> Support noted.</p> <p><b>Industrial Intensification on SILs and LILs</b> The Council is already using a proactive approach on industrial intensification, including the promotion of no net loss of industrial capacity and delivering intensification on all SILs and LILs, as well as the change to Regulation 18 Local Plan to introduce tall building zones on SILs to accommodate stacked industrial uses. However, the Council recognises the importance of ensuring the Plan is positively prepared, justified and effective, and therefore made the following modifications to enable a more proactive approach to industrial intensification on the sites identified with greater potential for intensification in the Employment Land Review 2022 and explain the steps the Council is already taking to enable this intensification.</p>

		<p>The modifications made are: Table 12 Footnote for 'Sites with potential for intensification': <b>Including the 10 Strategic Industrial Locations/ Local Industrial Locations with potential for intensification in the plan period identified in Table 4.5 of the Employment Land Review (2022).</b></p> <p>Policy J1.2 implementation text: To meet the industrial demand and enable employment growth, industrial development in both SILs and LILs have to take the form of intensification to deliver further industrial floorspace and not to release land for the delivery of, or co-location with, residential. <b>Where Strategic Industrial Locations and Local Industrial Locations have been identified as sites with potential for intensification in the plan period under Table 4.5 of the Employment Land Review (2022), the Council will work proactively with site owners and industrial occupiers to explore the opportunities for optimisation of industrial capacity at these sites where appropriate. It is also acknowledged that some of these sites are owned by the Council, which provides additional opportunities for proactive planning for industrial intensification to achieve the objective of this policy.</b></p> <p>This comment has been subject to further discussion with the GLA. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report.</p>
<b>J3: Protecting employment floorspace</b>	<p><b>No net loss of industrial land</b> Network Rail objected to this approach on SIL6 Bow Goods Yard and requested SIL release through intensification and consolidation. Simpson and Goldstein objected to the requirement for yard spaces to be included in industrial intensification.</p>	<p><b>No net loss of industrial land</b> No changes have been made to this approach as the release of the SIL or yard spaces will be harmful to the supply of industrial land needed in the borough, as assessed in the Employment Land Review 2022. Bow Goods Yard is designated as a SIL for consolidation and intensification of existing industrial uses with potential for redevelopment in form of large floorplate industrial accommodation as identified in the Employment Land Review</p>

	<p><b>Clarity of requirements for site allocations</b>  Ballymore and the Silvertown Partnership LLP requested greater clarity regarding the requirements for the relocation of existing businesses, submission of marketing evidence and 15-minute mapping to justify loss of employment floorspace on site allocations.</p>	<p>2022. While we acknowledge the site is subject to a live planning application, it does not alter our approach to the SIL.</p> <p><b>Clarity of requirements for site allocations</b>  A response to this comment was provided in the Regulation 18 Local Plan Consultation Report and a change was made to the policy wording to improve clarity regarding what applicants should do to demonstrate reasonable endeavours to relocate existing businesses as well as to make it clear that developments on site allocation should follow the development principles as set out in relevant site allocations in the Plan.</p>
--	---	---

<b>J4: Delivering Community Wealth Building and Inclusive Growth</b>	<p><b>General support</b> St William Homes LLP supported the overall objective of community wealth building.</p> <p><b>Developer contributions to local training and employment</b> A number of developers, the Home Builders Federation and the Royal Docks team objected to, or requested greater flexibility with regards to, the requirements for contributions to local training and employment, and questioned the viability and deliverability of this requirement. Some residents questioned how the plan will enable economic growth and help local employment.</p> <p><b>Affordable workspace</b> The Royal Docks team supported the requirement for affordable workspace for at least 15 years or in perpetuity and recommended ways to facilitate the workspace provider selection process. The Silvertown Partnership LLP raised concerns about the viability of the affordable workspace requirement on site allocations.</p>	<p><b>General support</b> Support noted.</p> <p><b>Developer contributions to local training and employment</b> All major developments must contribute to high quality economic opportunities for local residents and support our inclusive Economy objectives through both on-site provision and financial contributions as to address Newham's disproportionate levels of poverty and low pay, particularly for some groups. This approach was previously found sound and agreed in the adopted local plan which has proved deliverable over the plan period. The financial contribution requirement has been tested viable in the whole plan viability assessment.</p> <p>A modification has been made to improve clarity regarding the flexibility of this requirement.</p> <p>The modification made is: J4.1 Implementation Text: The level and nature of the contribution will be determined at the pre-application stage and prior to the determination of the planning application. <b>Proposals that are not proposing to meet the contribution requirement on viability grounds must meet the requirements of Policy BFN4.</b></p> <p><b>Affordable workspace</b> No change has been made as site allocations required to deliver employment uses, as set out in the relevant site allocation's development principles, are not required to provide affordable workspace. In addition, the requirement for applicants proposing affordable workspace to demonstrate appropriate delivery details and engagement evidence with workspace providers are already covered in Policy J4.</p>
--	---	---

Homes		
<b>H1: Meeting housing needs</b>	<b>Housing Target</b> <p>The GLA, developers and the Home Builders Federation objected to Newham not being able to meet its 2021 London Plan housing target within the London Plan period. The GLA raised this as an issue of general conformity with the London Plan. Some developers raised concerns that the plan's approach to affordable housing, tall buildings, greenspaces and Metropolitan Open Land may be constraining supply. CPRE felt the delivery of the housing target presented a risk of over-allocating land and should not lead to any loss of greenspace.</p>	<b>Housing Target</b> <p>A change to this policy approach has not been made, as Newham has more than enough capacity to meet the London Plan housing target, albeit because of delays to site allocation delivery we won't be able to meet our London Plan target until 2033/34. Fundamentally, we consider our approach to housing delivery is both justified and effective, being based on realistic evidence of delivery rates, as set out in more detail in the Site Allocation and Housing Trajectory Methodology Note. Notwithstanding this, Newham has drafted the following modification, which will be presented to the examiner for their consideration, to ensure the housing target is based on Newham's most up-to-date housing trajectory:</p> <p>Newham will enable a net increase of between <del>51,425 and 53,784</del> <b>53,194 and 54,976</b> quality residential units between 2023 and 2038.</p>
	<b>Target beyond the 2021 London Plan period</b> <p>The GLA objected to Newham lowering its housing target in the years beyond the London Plan period.</p>	<b>Target beyond the 2021 London Plan period</b> <p>A change to this policy approach has not been made, as we consider our approach to be in conformity with the requirements set out in the London Plan. Once Newham have met the London Plan housing target, capacity is based on the 2017 SHLAA, any additional capacity delivered as a result of any committed transport infrastructure improvements, and the rolling forward of the housing capacity assumptions applied in the London Plan for small sites. The approach is in conformity with the requirements of paragraph 4.1.11 of the London Plan. The Council is satisfied that the plan remains sound without the proposed changes.</p>
	<b>Recognising the needs of people requiring specialist housing</b> <p>London Gypsies and Travellers and Shelter recommended that the housing policies make reference to the wide range</p>	<b>Recognising the needs of people requiring specialist housing</b> <p>We did not consider changes to Policy H1 to be necessary as the policy allows for the delivery of a range of housing tenures and typologies. The need to consider the findings of the borough's Strategic Housing Market</p>

	<p>of housing needs residents are likely to have, including the needs of families, Gypsies and Travellers, people in temporary accommodation, homeless people, migrants, asylum seekers and people requiring specialist forms of housing.</p> <p><b>Small sites</b> The GLA and Aston Mansfield felt the plan should place greater emphasis on optimising delivery on small sites.</p> <p><b>Publishing housing capacity assumptions for site allocations</b> The GLA and Aston Mansfield felt the plan should publish housing capacity figures for each of the site allocations.</p>	<p>Assessment (which assessed these different needs) is set out in Policy H4.1b, and a modification has been made to Policy H4 to include consideration of the borough's Gypsy and Traveller Accommodation Assessment as follows: [H4.1.b] evidence of housing need as set out in Newham's latest Strategic Housing Market Assessment <b>and in the Gypsy and Traveller Accommodation Assessment;</b>"</p> <p><b>Small sites</b> A change in this policy approach has not been made, as Newham have published a Small Sites Intensification Guidance 2024. This guidance will support the future optimisation of capacity on small sites, to ensure we meet the GLA's small sites target for Newham, an uplift on delivery to date. The policy approach is therefore positively prepared and will be effective in development management decision-making on small sites. The Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>Publishing housing capacity assumptions for site allocations</b> A change in this policy approach has not been made, as the London Plan Policy H1 does not require boroughs to publish the capacity figures associated with individual sites so the Council is satisfied that the plan is sound without the proposed changes.</p>
<b>H2: Protecting and improving existing housing</b>	<p><b>Loss of large-scale purpose-built shared living and purpose-built student accommodation</b> Watkin Jones felt the plan should seek to specifically protect purpose-built student accommodation floorspace and large-scale purpose-built shared living floorspace from redevelopment.</p>	<p><b>Loss of large-scale purpose-built shared living and purpose-built student accommodation</b> We did not consider this change to be necessary as Policy H2 only applies specific protections for affordable, family and specialist homes (assessed under Policy H6), recognising the need to not undermine our ability to meet the significant need for these forms of accommodation. We remain confident that purpose-built student accommodation will be delivered and isn't required to meet our priority housing needs, unlike the forms of housing the policy is seeking to protect. Therefore policy is justified.</p>

	<p><b>Temporary accommodation and addressing homelessness</b> People who work in the borough and Just Homes Charity raised concerns about the Council using temporary accommodation to relieve homelessness. One Newham raised that they were considering delivering move-on accommodation, and raised concerns that the safeguarding of family homes in the plan potentially may prevent this accommodation from being brought forward.</p> <p><b>Loss of family homes</b> PEACH expressed concern about the policy resulting in a loss of family homes, potentially leading to families being placed in houses in multiple occupation. With regards to part 4 of the policy, Shelter and Newham Temporary Accommodation Action Group wanted to see a commitment to consulting the Temporary Accommodation service and the Council's Children's Commissioners as part of the application process. They also wanted a proportion of converted homes to be adapted or adaptable to residents in Newham with a disability or additional needs.</p>	<p><b>Temporary accommodation and addressing homelessness</b> A change to this policy approach was not considered necessary as the Plan already effectively balances the need to meet the need for family homes, as evidenced in the SHMA, and the need for temporary accommodation. In order to help address the immediate needs of our temporary accommodation service, Policy H2 provides an exception to allow the conversion of family housing, for a temporary period, to meet the need of homeless single people in the borough. Furthermore, policies H3 and H4 will provide more affordable and family homes in Newham to meet long term needs. A modification has also been made to policy HS8 to clarify how demand for hotels will be balanced with the need for general needs housing. The Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>Loss of family homes</b> A change in this policy approach has not been made, as a range of policies in the Plan already effectively balance the need to meet the need for family homes, as evidenced in the SHMA, and the need for temporary accommodation. Policy H2.3 is an effective adopted policy that has operated well, and only allows for conversions where the resultant housing would be higher quality than the existing family unit. Policy H2.4 only allows for conversion of family homes on a temporary basis, and to specifically meet the needs of Newham Care Leavers or homeless single people in Newham, rather than families requiring temporary accommodation. Policy H11 sets requirements for the delivery of accessible and adaptable properties in conformity with the requirements of the London Plan. The Council also recognises the importance of ensuring Policy H2.4 effectively meets the needs of the Council services who will be involved in housing people in the accommodation and has therefore made the following wording change, which is included in the modification table:</p>
--	--	--



	<p><b>Retrofit</b> PEACH expressed a strong preference for retrofit of homes before considering demolition.</p>	<p>4. Development that results in the subdivision or conversion of a family dwellinghouse (C3) with three or more bedrooms to meet the housing needs of Newham Care Leavers or homeless single people in Newham or people who are owed a homelessness duty by the Council may be acceptable. In these circumstances, proposals will be given a temporary change of use planning permission of up to five years. Any application would be expected to be accompanied by evidence to demonstrate that the property would be used as:</p> <p>a. a house in multiple occupation (C4) for up to six sharers for sole use by Newham Care Leavers; or</p> <p>b. a house in multiple occupation for the sole use by Newham's <del>Temporary Accommodation service</del> <b>Council</b> for people who are owed a homelessness duty or single homeless people; and</p> <p><b>Retrofit</b> A change in this policy approach has not been made, as Policies CE3 and CE5 already requires developers to apply circular economy principles and reduce embodied carbon including by demonstrating that retaining and reusing existing buildings and structures have been fully explored before considering substantial demolition. The Council is satisfied that the plan remains sound without the proposed changes.</p>
<b>H3: Affordable housing</b>	<p><b>Affordable housing target</b> A resident felt the plan submission should be delayed to account for the government consulting on changes to national policy. Residents supported the prioritisation of affordable housing delivery, although some residents considered that the plan could deliver more social rent homes if a new methodology for assessing need was used. The GLA and developers expressed strong opposition to the</p>	<p><b>Affordable housing target</b> It is legally compliant for the plan to progress under the previous version of the National Planning Policy Framework. Reconsidering the plan under the new NPPF would cause significant delays to the plan making process, delaying the implementation of the multiple benefits this new plan will have for our residents. Furthermore, the Strategic Housing Market Assessment that has informed the policy has been undertaken using a robust</p>

	<p>affordable housing target, in particularly the need to deliver 50% social rent homes. They highlighted the significant viability challenges associated with delivering a high percentage of affordable housing. The GLA raised this as an issue of general conformity with the London Plan. Several developers and the GLA requested the affordable housing target be aligned with the threshold approach set out in the London Plan. PEACH expressed concerns about the target being subject to viability testing, while a resident requested that the references to viability testing be removed from the affordable housing target.</p> <p><b>Measuring the target based on total units, rather than habitable rooms</b>          Developers and a resident felt the affordable housing target should be measured based on a scheme's number of habitable rooms, rather than total units as per the policy wording.</p> <p><b>Intermediate tenures</b>          L&amp;Q requested that the affordable housing target required the delivery of intermediate tenures, rather than 'affordable home ownership housing' to better clarify which tenures would be supported by the policy.</p>	<p>methodology that has withstood scrutiny at Local Plan examinations, and therefore does not require updating.</p> <p>A change in this policy approach has not been made, as the affordable housing target seeks to meet identified need for social rent homes, the evidence for which is demonstrated by our strategic housing market assessment and the fact that Newham has the highest number of residents in temporary accommodation in the country. 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 where the targets cannot be met, thereby helping to ensure the policy is effective and deliverable. The Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>Measuring the target based on total units, rather than habitable rooms</b>          A change in this policy approach has not been made, as schemes can achieve a greater proportion of family and affordable housing by using targets based on units rather than habitable rooms, thereby helping to ensure the policies are effective and positively prepared to meet need. The Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>Intermediate tenures</b>          The Council recognises the importance of ensuring the Plan is effective and able to respond to changes to requirements for different affordable housing products (for example, the changes to the requirement for affordable home ownership delivery under the NPPF 2024). Newham has therefore drafted the following modification, which will be presented to the examiner for their consideration, to policy H3:</p>
--	---	---

	<p><b>Defining genuinely affordable homes</b></p> <p>Muse requested that the term ‘Genuinely affordable’ housing was defined.</p>	<p>1. Newham’s policy priority is the provision of more social rent homes. Residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should provide 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as <del>affordable home ownership</del> <b>intermediate</b> housing. Developments that do not meet these requirements and the delivery of the required level of family dwellinghouses (C3) under Local Plan Policy H4.2 will not be supported unless accompanied by a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered.</p> <p><b>Defining genuinely affordable homes</b></p> <p>The Council recognises the importance of ensuring the Plan is effective and has therefore made the following wording change which is included in the modification table:</p> <p>[Glossary] <b>Genuinely affordable housing: As per the GLA’s preferred affordable housing tenures in the London Plan (2021), genuinely affordable homes are:</b></p> <ul style="list-style-type: none"> <li>• homes based on social rent levels, including Social Rent and London Affordable Rent</li> <li>• London Living Rent; and</li> <li>• London Shared Ownership.</li> </ul>
<b>H4: Housing mix</b>	<p><b>Housing mix targets for family and one bedroom homes</b></p> <p>Residents objected to the policy allowing the delivery of studio units, stating that their size made them inflexible and unsuitable for long-term accommodation. PEACH felt the family housing target should be increased for social rent homes. Developers and the GLA objected to the targets for family-sized dwellings, including larger family homes, and</p>	<p><b>Housing mix targets for family and one bedroom homes</b></p> <p>The Council considers that we have adopted an appropriate balance between meeting our objectively assessed need and ensuring deliverability. The Strategic Housing Market Assessment evidence base demonstrates a clear need for three bedroom properties (in both affordable and market tenures), rather than two or one bedroom homes. We consider that it is important that all residents, including families, have access to more secure</p>

	<p>the limits on one bedroom and studio units, citing the viability challenges of delivering these targets alongside affordable housing requirements. Some developers suggested that housing mix targets should be less restrictive in town centre and well-connected locations, as well as in built-to-rent developments. Some developers and a resident also suggested that family housing targets should only apply to social rent homes.</p>	<p>forms of rented accommodation. It is also important we deliver family homes in town centres and locations with good access to public transport as this is where a significant proportion of Newham’s housing target is set to be delivered. The policy also allows for the submission of a viability assessment in circumstances where developments are unable to achieve the family or affordable housing targets.</p> <p>However, the Council recognises the importance of ensuring the Plan is justified and effective, and therefore has drafted the following modification, which will be presented to the examiner for their consideration, to ensure the implementation of the policy accurately reflects our objectively assessed need for one bedroom homes as set out in the Strategic Housing Market Assessment:</p> <p>[Policy H4.4] New residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should deliver no more than 15 per cent of the number of new residential units as one bedroom, <del>two person</del> dwellinghouses (C3).</p> <p>[...]</p> <p>[Implementation text for Policy H4.4] H4.4 sets a maximum delivery expectation for one bedroom homes on major development sites. Developments delivering above 15 per cent of the total homes as one bedroom, <del>two person</del> homes will need to robustly justify this provision in accordance with the requirements of part 1 of the policy. Exceptions to this requirement include student housing, specialist housing including care, sheltered housing, extra-care and care home housing designed for older people. The aforementioned list is not exhaustive, and other housing types which could benefit from an exception to this policy requirement will be considered on a case-by-case basis.</p> <p>[...]</p>
--	--	--

	<p><b>Reference to the Gypsy and Traveller Accommodation Assessment</b></p> <p>London Gypsies and Travellers requested that the addition of the Gypsy and Traveller Accommodation Assessment to the list of considerations in Policy H4.1.</p>	<p>[Implementation text for Policy H4.5] H4.5 sets a maximum delivery expectation for studio homes or one-bedroom, one person homes on major development sites. <b>This 5 per cent counts towards the overall 15 per cent maximum delivery expectation sought for one bedroom homes under part 4 of the policy.</b> Developments delivering above 5 per cent of the total homes as studio or one-bedroom, one person homes will need to robustly justify this provision in accordance with the requirements of part 1 of the policy and are unlikely to be supported.</p> <p><b>Reference to the Gypsy and Traveller Accommodation Assessment</b></p> <p>The Council recognises the importance of ensuring the Plan is positively prepared, justified and effective and has therefore made the suggested wording change, which is included in the modification table:</p> <p>[H4.1.b] evidence of housing need as set out in Newham’s latest Strategic Housing Market Assessment <b>and in the Gypsy and Traveller Accommodation Assessment;</b>”</p>
<b>H5: Build to Rent housing</b>	<p><b>Affordable housing targets for build to rent</b></p> <p>Developers objected to the policy’s affordable housing target for build to rent developments on viability grounds, noting the differences between for sale and for rent developments. Watkin Jones also objected to the requirement for dual viability assessments on this basis, stating there would be a requirement to draw up two different architectural schemes to meet this policy requirement. Developers considered the target should align with the London Plan (2021), which allows for the housing offer within Build to Rent schemes to be solely discounted market rent. Get Living Plc and Unibail-Rodamco-Westfield also expressed confusion over the need to deliver Affordable</p>	<p><b>Affordable housing targets for build to rent</b></p> <p>The policy is positively prepared, seeking to align our affordable housing delivery in built to rent schemes with housing need. Furthermore, the design quality requirements for build to rent and build for sale homes are the same under Local Plan Policy H11, and therefore should not require the production of different architectural drawings for dual viability assessments. However, the Council has drafted the following modification, which will be presented to the examiner for their consideration, to clarify that the homes do not need to be managed by a Registered Provider. The proposed modification to the policy also changes the rent level requirement from London Affordable Rent to Social Rent, noting that London Affordable Rent levels are no longer published and readily available on the GLA website:</p>

	<p>Rent on build to rent schemes. PEACH stated that the policy should require the delivery of affordable housing at social rent levels, noting affordable rent tenures were more expensive.</p> <p><b>Requirements for build to rent being onerous</b> Places for London, Watkin Jones and the Silvertown Partnership felt the policy requirements in H5.1 were onerous to deliver and unduly replicated the requirements of the London Plan, in particular the requirements for on-site management, minimum tenancy lengths, covenants and clawbacks and the need for blocks or phases to be at least 50 dwellings.</p>	<p>[H5.3] 3. Developments of Build to Rent housing as the sole residential tenure should provide at least 50 per cent of the total units as <del>A</del>affordable <del>Rented H</del>omes, <b>rented</b> at equivalent rents to <del>London Affordable Social</del> Rent and 10 per cent of the total units being <del>A</del>affordable <del>Rented H</del>omes, <b>rented</b> at equivalent rents to London Living Rent. These affordable homes will be secured as affordable housing in perpetuity irrespective of the covenant period secured through H5.1.c.</p> <p><b>Requirements for build to rent being onerous</b> These policy requirements are in conformity with Policy H11 of the London Plan. The Council is satisfied that the plan remains sound without the proposed changes.</p>
<b>H6: Supported and specialist housing</b>	<p><b>Highlighting the importance of specialist accommodation</b> People who work in the borough and Just Homes Charity highlighted the demand for and importance of supported accommodation with charitable aims to help address issues including helping members of the community back into employment and reducing dependency on the benefit system. They felt affordable forms of this accommodation should be ring-fenced, and that supported housing providers should be supported towards becoming registered providers. The felt the policy should have clear aims and objectives for this accommodation type and include monitored targets on performance.</p>	<p><b>Highlighting the importance of specialist accommodation</b> The Council agrees that delivering high-quality supported accommodation is an important part of addressing housing need in the borough. Policy H6 (Supported and specialist housing) will help ensure we provide a sufficient amount of high quality, appropriately located supported accommodation aligned with local need. It is not possible to require specific targets for supported and specialist accommodation for the duration of the plan period, as evidence of need for different forms of accommodation is periodically updated via annual position statements. The Council is satisfied that the plan remains sound without the proposed changes.</p>

<b>H7: Specialist housing for older people</b>	<b>Aligning policy requirements with the London Plan</b> <p>The Home Builders Federation objected to the policy's location requirements, stating that the policy should be amended to reflect the London Plan, which supports residential developments within 800m of a town centre boundary or train station or within PTALs 3-6. They also considered that the policy should also be amended to refer to the older person's housing benchmark targets set out in the London Plan.</p>	<b>Aligning policy requirements with the London Plan</b> <p>A change in this policy approach has not been made. The policy allows for flexibility of location where specific care needs and/or vulnerabilities justify an alternative location. The policy does not include the London Plan benchmark target as this will be considered in the round as part of the development plan in decision making. The Council is satisfied that the plan is sound without the proposed changes.</p>
--	--	---

<p><b>H8: Purpose-built student accommodation</b></p>	<p><b>Limiting over-saturation</b></p> <p>Developers, the University of East London and University College London objected to the policy approach in relation to preventing over-saturation of purpose-built student accommodation in the Stratford and Maryland neighbourhood, and more broadly preventing over-saturation of this form of housing in other parts of the borough. They considered the approach to be contrary to the London Plan and felt that purpose-built student accommodation made an important contribution to the borough's land supply and to the mix and balance of housing in neighbourhoods. They also raised the strong demand for purpose-built student accommodation in Stratford and Maryland, noting the number of institutions located in the neighbourhood. Some developers and University College London also felt that the location requirements of the policy should allow for accommodation to be located close to town centres, not just within their boundaries.</p> <p>Stratford Original BID highlighted concerns with how new student accommodation developments could be better integrated in the existing community, including the business community. PEACH felt accommodation should only be built where there is demonstrable need.</p> <p>More broadly, developers raised concerns regarding the negative connotations associated with the term 'over-saturation', the definition of the term 'adjacent', as well as how to apply the policy to developments that have been approved but not yet built and the need to clarify how overconcentration will be measured.</p>	<p><b>Limiting over-saturation</b></p> <p>The locational limits on purpose-built student accommodation seek to ensure that this accommodation provision contributes to neighbourhoods having a mix and balance of housing types and sizes. With the majority of Newham's housing need being general needs housing, namely family and affordable homes, it is imperative that we utilise the limited land available to meet the borough's and London's wider priority housing needs. This is especially important in the Stratford and Maryland neighbourhood, which represents a significant proportion of the borough's planned housing delivery. The policy supports meeting the need for purpose-built student accommodation by supporting accommodation delivery to meet student housing needs across a range of other well-connected town centre locations in the borough, which can effectively support these densely occupied forms of development, and are most accessible to a range of users.</p> <p>However, in order to address comments which raised concerns regarding the terms 'over-saturation', 'adjacent', as well as how to apply the oversaturation criteria and the application of the policy to developments that have been approved but not yet built, the Council has drafted the following modification, which will be presented to the examiner for their consideration::</p> <p>[Policy H8] 1. New purpose-built student accommodation in Stratford and Maryland neighbourhood will only be supported where:</p> <ul style="list-style-type: none"> <li>a. it is located within or adjacent to an existing <b>or approved</b> campus development in the neighbourhood; or</li> <li>b. it is solely providing a replacement facility with no net increase in bed spaces.</li> </ul> <p>2. New purpose-built student accommodation in all other neighbourhoods outside Stratford and Maryland will only be supported where:</p> <ul style="list-style-type: none"> <li>a. it is located within or adjacent to an existing <b>or approved</b> campus development in the borough; or</li> </ul>
---	--	---



		<p>b. it is in a town centre or local centre location well connected by public transport (with a minimum Public Transport Accessibility Level of 4); and</p> <p>c. it will not create an over-saturation <b>concentration</b> of purpose-built student accommodation; or</p> <p>d. it is solely providing a replacement facility with no net increase in bed spaces or it is located within or adjacent to an existing <b>or approved</b> campus development in the borough.</p> <p>3. New purpose-built student accommodation should provide at least 60 per cent affordable student accommodation as defined within the London Plan 2021. Developments for purpose-built student accommodation that do not achieve a policy compliant level of affordable student accommodation on site are required to submit a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered.</p> <p>4. New purpose-built student accommodation should:</p> <p>a. secure the majority of the bedrooms in the development, including all of the affordable student accommodation bedrooms, through a nomination agreement, for occupation by students of one or more higher education providers; or</p> <p>b. in areas of over-saturation <b>concentration</b>, secure all of the bedrooms in the development through a nomination agreement, for occupation by students of one or more higher education providers; and</p> <p>c. where purpose-built student accommodation is being delivered within or adjacent to an existing <b>or approved</b> campus development in the borough in accordance with H8.1.a or H8.2.d, the nominations agreement should be secured for occupation by students of the higher education provider that the development is located is-within or adjacent to.</p> <p>5. Developments delivering purpose-built student accommodation should provide ancillary communal space for study and sporting facilities that meet the needs of the student population within a development unless the</p>
--	--	--

		<p>accommodation is located within 1,200 metres of existing <b>or approved</b> student campus-based facilities for studying and/or sport and recreation that have sufficient capacity to meet any increased need.</p> <p>6. Developments for purpose-built student accommodation should include an appropriately detailed and resourced residential management plan.</p> <p>[...]</p> <p>[Policy H8 Implementation text - ALL section] This policy will seek to monitor over-<del>saturation</del><b>concentration</b> of student bed spaces in each neighbourhood. For the purposes of this policy, over-<del>saturation</del><b>concentration</b> of purpose built student accommodation in a neighbourhood or resulting from a development is considered to be:</p> <ul style="list-style-type: none"> <li>• over 25 per cent of net residential approvals and completions over the plan period being delivered as purpose built student accommodation in a neighbourhood; and/or</li> <li>• a proposal would lead to over 800 beds of student housing, <b>including existing or approved purpose built student accommodation sites</b>, being located within a radius of 300 metres from <b>the proposal site</b> <del>an existing purpose built student accommodation site or approved development</del>.</li> </ul> <p><b>In assessing overconcentration, student accommodation and other forms of net non-self-contained communal accommodation will be measured using the net number of bed-spaces they provide, while general needs housing will be measured on a unit basis.</b></p> <p><b>For the purposes of this policy only, adjacent to is defined as ‘being within 300 metres of’.</b></p> <p><b>For the purposes of this policy, ‘campus’ is defined as ‘a cluster of teaching and student facility buildings and purpose built student accommodation that serve a single college or university’.</b></p>
--	--	--

	<p><b>No net increase in bed spaces in areas of over-saturation</b>  Dominus Stratford Limited, Unite Group Plc, Watkin Jones and University of East London objected to the requirement to not allow a net increase in bed spaces of existing purpose-built student accommodation in areas of over-saturation. They felt this was unduly restrictive and would not allow for viable redevelopment of existing accommodation.</p> <p><b>Freeing up existing housing</b>  Developers raised that purpose-built student accommodation has the potential to take students out of the private rented sector, freeing up housing for the wider community.</p> <p><b>Affordable housing requirements</b>  Developers and the University of East London considered that the affordable housing target proposed by the policy was excessive, and would not be viable to deliver. Shelter and Newham Temporary Accommodation Action Group highlighted the need to deliver family homes for students with families and specifically international students with dependents.</p>	<p><b>No net increase in bed spaces in areas of over-saturation</b>  A change to this policy approach has not been made. Relaxing the wording would weaken our position to provide purpose-built student accommodation that helps meet the need of Higher Education Institutions in Newham. Furthermore, we note that existing purpose-built student accommodation in areas of overconcentration in the borough have all been recently developed, and therefore it is not envisioned they would require repurposing during the course of the plan period. The Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>Freeing up existing housing</b>  Comment noted. Newham’s article 4 direction places limits on the number of new Houses in Multiple Occupation that can be delivered in the borough. This is due to our high need for family-sized homes, and means these forms of housing are less likely to be used as student accommodation, albeit some students may reside in existing lawful Houses in Multiple Occupation.</p> <p><b>Affordable housing requirements</b>  A change to this policy approach has not been made. The target aligns with our strategic affordable housing target, which seeks to meet identified need for affordable accommodation, the evidence for which is demonstrated by our strategic housing market assessment and the fact that Newham has the highest number of residents in temporary accommodation in the country. 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 where the targets cannot be met, thereby helping to ensure the policy is effective and deliverable. With regards to need for family homes for students with dependents, policy H4 seeks to meet the needs of families across the borough, including requiring a viability tested target for 40% of new residential units on major applications</p>
--	--	--

	<p><b>Nominations Agreements</b> Developers felt the more stringent nominations agreement requirements in areas of oversaturation were overly restrictive, and did not reflect that students may wish to live in different locations to their university. RAD CHP Ltd recommended that the policy be amended to require for a cascade mechanism for direct lets for all purpose-built student accommodation developments, should a nominations agreement not be secured by the point of first occupation.</p> <p><b>Study and sporting facilities that meet the needs of the student population</b> Unite Group PLC and Watkin Jones objected to the requirement for developments to provide ancillary communal space for study and sporting facilities that meet the needs of the student population within a development unless the accommodation is located within 1,200 metres of existing student campus-based facilities. They considered this requirement was onerous, and should be dealt with on a case-by-case basis.</p>	<p>to be family dwellinghouses. The Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>Nominations Agreements</b> The approach to nominations agreements in Policy H8 is justified by ensuring we support HEIs who are currently located in areas of overconcentration. In these locations the Council is seeking to limit speculative purpose-built student accommodation developments more broadly to make sure we don't undermine meeting our priority housing needs. Stronger nomination agreement requirements ensure that in areas of over-concentration nomination agreements prioritise meeting the housing needs of existing HEIs in the borough. In areas not subject to over-concentration, requirements align with the policy of the London Plan to meet wider accommodation needs.</p> <p><b>Study and sporting facilities that meet the needs of the student population</b> The policy approach is justified by seeking to protect existing community facilities and health facilities from pressures associated with significant increases of population in the local area. Newham's wide range of community facilities are an essential element of its neighbourhoods, helping to support the needs of people living and working in the borough. The policy will help relieve pressure on local social infrastructure for study and exercise, while ensure students have access to available quality exercise and study spaces. The Council is satisfied that the plan is sound without the proposed changes.</p>
--	---	---

<p><b>H9: Houses in multiple occupation and large-scale purpose-built shared living</b></p>	<p><b>Concerns relating to Article 4 direction</b> Bonny Downs Community Association raised that they were looking to purchase properties for use as houses in multiple occupation for move on accommodation. They raised the challenges in this approach due to the article 4 direction in Newham.</p> <p><b>Support for large-scale purpose-built shared living</b> Dominus Stratford Limited felt the policy should more proactively encourage co-living.</p> <p><b>Affordable housing requirements</b> Dominus Stratford Limited and Ballymore raised the potential benefits of large-scale purpose-built shared living developments being able to deliver on site C3 affordable housing instead of a payment in lieu. Watkin Jones and Ballymore requested that the policy be amended to reflect the London Plan, specially raising concerns about the need to exceed the level of affordable housing provision sought by Policy H3.</p>	<p><b>Concerns relating to Article 4 direction</b> Our policies protecting family homes from conversion are positively prepared and justified by our evidence of housing need. The policy does set out some exceptional circumstances where conversion of family homes to smaller units will be acceptable, including where homes will meet the housing needs of homeless single people in Newham or people who are owed a homelessness duty by the Council, provided the conversion is for a temporary period. It should be noted we have made modifications to this policy to ensure Policy H2.4 effectively meets the needs of the Council services who will be involved in housing people in the accommodation.</p> <p><b>Support for large-scale purpose-built shared living</b> The plan supports the delivery of large-scale purpose-built shared living, subject to developments meeting the requirements of the relevant plan policies that seek to ensure this type of housing is provided in suitable locations, is high-quality and does not undermine the protection of family housing.</p> <p><b>Affordable housing requirements</b> The Council is satisfied that the plan is sound without the proposed changes. Policy H9.3 requires large-scale purpose-built shared living developments to deliver affordable housing in accordance with Local Plan Policy H3, where housing is being delivered as part of a wider mix of tenures within the application boundary.</p> <p>More broadly, the policy approach in Policy H9 is effective and justified in that it accords with the approach taken in Newham's adopted 2018 Local Plan. This position reflects that cash in lieu payments do not accord with the objectives of Policy H4, which seeks to deliver a mix and balance of housing types and sizes. Therefore, higher cash in lieu contributions reflect that developments that were unable to provide on-site affordable housing were</p>
---	---	--

	<p>likely to have higher sales/rent values than developments delivering affordable homes on site, and that there is an onus on the Council to deliver these affordable homes to make up for this shortfall. The Council is satisfied that the plan is sound without the proposed changes.</p>
<p><b>Secure by design</b></p> <p>The Metropolitan Police Service recommended that the policy required developments to meet the secure by design requirements as per Policy D1, to ensure the best safety for all users of the development.</p>	<p><b>Secure by design</b></p> <p>We did not consider this change to be necessary as Policy D1 requires major developments to achieve Secured by Design accreditation for the physical security of buildings (Silver award). The Council is satisfied that the plan is sound without the proposed changes.</p>
<p><b>Locational requirements</b></p> <p>Watkin Jones felt the policy H9.4 should allow for developments to be located along major roads with a minimum or planned Public Transport Accessibility Level of 4. Ballymore suggested the requirement for the site to be a minimum Public Transport Accessibility Level of 4 be removed, and instead a requirement for a Transport Assessment or other suitable report be provided, ensuring any accommodation is appropriately accessible.</p>	<p><b>Locational requirements</b></p> <p>With regards to PTAL levels on major roads being minimum or planned, we do not consider this change is necessary for soundness. However the Council understands the reasons for the modification, and if they are further proposed by the Inspector, the Council would be supportive of these modifications being made. With regards to the broader concerns on the location requirements being linked to PTALs, we did not consider this change to be necessary as these locations identified in the policy can effectively support these densely occupied forms of development and are most accessible to a range of users.</p>
<p><b>Main town centre uses or social infrastructure provided within large-scale purpose-built shared living</b></p> <p>Watkin Jones requested that the policy requirement to only provide main town centre uses or social infrastructure within large-scale purpose-built shared living developments in suitable locations and where publicly accessible should only apply to land uses that are not ancillary. Simpson and Goldstein stated that it was critical that draft Policy H9 was</p>	<p><b>Main town centre uses or social infrastructure provided within large-scale purpose-built shared living</b></p> <p>With regards to ancillary uses, we did not consider this change to be necessary as we are satisfied the policy is effective, with ancillary uses forming part of the principal use being assessed as such through the development management process. Furthermore, we consider the policy requirements would not preclude communal facilities coming forward, provided they do not undermine our justified approach to delivering town</p>

	<p>updated to make specific reference to communal facilities within co-living schemes.</p>	<p>centre and employment uses in designated locations. Policy H11 also provides further guidance on how applicants should approach the provision of internal communal spaces for large-scale purpose-built shared living.</p> <p>However, the Council recognises the importance of ensuring the Plan is justified and effective and has therefore made the following wording change, which is included in the modification table:</p> <p>[H9.6 Implementation Text] Suitable locations are those which are defined as acceptable for Main Town Centre uses under Local Plan Policy HS1, Policy HS3 <b>and Policy J1</b> and social infrastructure under Policy SI2.</p>
<b>H10: Gypsy and Traveller accommodation</b>	<p><b>Neighbouring boroughs helping to meet Newham's need for Gypsy and Traveller Accommodation</b></p> <p>The London Borough of Barking and Dagenham and the Royal Borough of Greenwich confirmed they did not have capacity to provide additional pitches to provide accommodation for Gypsy and Traveller communities who may reside in Newham.</p> <p><b>Meeting need for Gypsy and Traveller Accommodation</b></p> <p>London Gypsies and Travellers recommended that the policy and the monitoring framework were made consistent by including the target of at least 23 additional pitches on at least one new Gypsy and/or Traveller site, in addition to expanding the existing designated site. They also requested that a timeframe for delivering new pitches and sites was added the Monitoring Framework. The GLA also requested that the plan set out the borough's ten year pitch requirements and plan to meet those needs.</p>	<p><b>Neighbouring boroughs helping to meet Newham's need for Gypsy and Traveller Accommodation</b></p> <p>These comments have been subject to further discussion with these boroughs and a satisfactory resolution has been found. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report.</p> <p><b>Meeting need for Gypsy and Traveller Accommodation</b></p> <p>We consider the policy approach is justified and effective for the reasons set out in the Gypsy and Traveller Topic Paper. This topic paper highlights the deliverability challenges of providing new sites for pitches in the borough, particularly given the significant areas of available land in the borough being in flood zones. The Council is satisfied that the plan remains sound without the proposed changes.</p> <p>However, in light of these comments the Council recognises the importance of ensuring the Plan is justified and has made the following wording change to the monitoring framework, which is included in the modification table:</p>

	<p><b>Transit sites and negotiated stopping arrangements</b>  London Gypsies and Travellers recommended that the policy was amended to make provisions for a transit site and to identify suitable types of locations for negotiated stopping approaches.</p>	<p><del>No target.</del> <b>23 pitches between 2022 and 2038.</b></p> <p>Monitor proportionately compared to need identified in the Gypsy and Traveller Accommodation Assessment and any emerging evidence prepared by the GLA.</p> <p><b>Transit sites and negotiated stopping arrangements</b>  The Council recognises the importance of ensuring the Plan is positively prepared to meet the needs of people requiring transit sites and negotiated stopping areas and has therefore has drafted the following modification, which will be presented to the examiner for their consideration:</p> <p><del>3-</del> <b>1.</b> The designated Gypsy and Traveller site is safeguarded as a site for Gypsy and Traveller accommodation.</p> <p><del>4-</del> <b>2.</b> Developments that propose accommodation for Gypsies, Travellers and Travelling Showpeople, including those for new sites and pitches <b>and transit sites and sites for negotiated stopping</b>, will be supported where they meet identified need.</p> <p><del>5-</del> <b>3.</b> Developments that propose accommodation to meet these needs of Gypsies, Travellers and Travelling Showpeople should be located:</p> <ul style="list-style-type: none"> <li>a. outside of the Green Belt or Metropolitan Open Land, unless there are very special circumstances; and</li> <li>b. <b>where they are providing permanent accommodation</b>, in flood zone 1 or exceptionally in flood zone 2, subject to meeting the requirements of Local Plan Policy CE7; and</li> <li>c. <b>where they are providing transit sites and sites for negotiated stopping, in flood zone 1, in flood zone 2 where a sequential test is passed, or exceptionally in flood zone 3, subject to meeting the requirements of Local Plan Policy CE7; and</b></li> <li>ed. on sites that can provide the associated necessary (primarily physical)</li> </ul>
--	---	---



		<p>infrastructure requirements to service the needs of a development or wider site; and</p> <p><del>de.</del> on land that provides safe access to the highway and should not result in any unacceptable impact on the capacity and environment of the highway network; and</p> <p><del>ef.</del> the site is in a sustainable location, appropriate for residential development and in reasonable proximity to relevant services and facilities, including transport, education, healthcare and other relevant social infrastructure provision.</p> <p><del>6.</del> <b>4.</b> Developments that propose accommodation to meet the needs of Gypsies, Travellers and Travelling Showpeople should:</p> <p>a. provide an appropriately detailed management plan; and</p> <p>b. demonstrate that quality standards have been co-designed in consultation with representatives of the local Gypsy, Traveller and Travelling Showpeople community.</p>
<b>H11: Housing design quality</b>	<p><b>Requirements being onerous to deliver</b></p> <p>Some developers supported the simplification of design requirements in the Draft Submission Local Plan, while some considered there was undue repetition with the London Plan Housing Design Standards LPG. Developers continued to raised concerns in relation to some of the remaining requirements, including the need to provide dual aspect homes, shared amenity space provision, the meaning of irregular geometry, the need to minimise the number of private outdoor amenity spaces accessed from bedrooms and the need to locate any ground floor private amenity spaces away from street facing facades.</p>	<p><b>Requirements being onerous to deliver</b></p> <p>With regards to dual aspect design, the Council considers policy H11 2.c to be in conformity with the Housing Design Standards B2.3 and C4.1 which promote deck access typology and require new homes to be dual aspects 'unless exceptional circumstances make it impractical or undesirable'.</p> <p>With regards to requirements for a minimum level of shared amenity space, the importance of accessing shared amenity space is evidenced in the Newham Characterisation Study, which provides guidance and recommendations specific to Newham context. More information on green space deficiency in the borough can be found in Newham Green and Water Infrastructure Strategy and are highlighted in Site Allocations Infrastructure Requirements when required.</p>

	<p><b>Newham's 'Housing design needs study' guidance</b> A resident and St William raised concerns that the 'Housing design needs study' guidance referred to at H11.4 has not been published and therefore should be removed from the policy. Berkeley Homes stated that the guidance should not fetter the delivery of social rented homes within the borough and welcomes the opportunity to be consulted on this document once available.</p> <p><b>Wheelchair accessible accommodation in purpose-built student accommodation</b></p>	<p>With regards to the meaning of irregular geometry, the implementation text of H11.1 is clear on design requirements and layout's assessment to ensure potential future reconfiguration. Furthermore, the Council considers the requirement to minimise the number of private outdoor amenity spaces accessed from bedrooms to be in conformity with the Housing Design Standards LPG which requires private amenity spaces to be accessed by kitchen/dining room 'unless the specific circumstances make this impractical'.</p> <p>With regards to ground floor private amenity adjacent the street, the Council acknowledges that there was a slightly contradiction between policy H11 2.e and supporting text and has therefore made the following wording change to ensure clarity and consistency, which is included in the modification table:</p> <p><b>e. provide an adequate boundary treatment to ground floor street-facing amenity space and</b> locate any ground floor private amenity spaces away from <b>roads that are a source of significant noise, air quality or visual impacts.</b> <del>street-facing facades.</del></p> <p><b>Newham's 'Housing design needs study' guidance</b> We consider the now published evidence base to positively prepared, justified and effective. The guidance relates to the housing design needs of neurodivergent residents and residents with learning disabilities, and has been prepared using evidence of local housing needs, analysis of existing housing design and detailed engagement with residents. It is not unusual for plans to commit to producing supplementary planning guidance to support Local Plan policies. We are also planning to consult on the study in 2025.</p>
--	--	---

	<p>Unite recommended the requirements for wheelchair-accessible purpose built student accommodation be amended to building regulation requirements of 1% fitted out with a further 4% of bed spaces being adaptable.</p> <p><b>Playspace</b> Watkin Jones stated that playspace requirements should not apply to purpose-built student accommodation as this does not generate a need for such infrastructure.</p> <p><b>Emergency Accommodation</b></p>	<p><b>Wheelchair accessible accommodation in purpose-built student accommodation</b> The Council's objective for this policy approach is to be positively prepared and justified, meeting the needs of disabled students. However, the Council recognises the importance of ensuring the Plan is effective and therefore proposes to support the following wording change:</p> <p>e. Purpose-built student accommodation should provide <b>accessible student accommodation in accordance with the requirements of 'Box 3: Accessible Student Accommodation Standards' set out in the London Plan Guidance: Purpose-built Student Accommodation (October 2024).</b> <del>either:</del></p> <ul style="list-style-type: none"> <li><del>i. ten per cent of new bedrooms to be wheelchair-accessible in accordance with Figure 52 incorporating either Figure 30 or 33 of British Standard BS8300-2:2018 Design of an accessible and inclusive built environment. Buildings – Code of practice; or</del></li> <li><del>ii. 15 per cent of new bedrooms to be accessible rooms in accordance with the requirements of 19.2.1.2 of British Standard BS8300-2:2018 Design of an accessible and inclusive built environment. Buildings – Code of practice.</del></li> </ul> <p><b>Playspace</b> The Council recognises the importance of ensuring the Plan is effective and therefore has drafted the following modification, which will be presented to the examiner for their consideration:</p> <p>e. <b>where the development is likely to be used by children and young people</b>, provide onsite play provision in accordance with both the requirements of London Plan 2021 Policy S4 and Local Plan Policies GWS5 and, where relevant, D2. Of-site play space will only be supported in exceptional circumstances where it can be demonstrated that it would lead to the provision of facilities, accessible to the development site, which are of greater quality and quantity than can be provided onsite.</p>
--	--	---

	<p>Shelter and Newham Temporary Accommodation Action Group considered that the policy should mention emergency temporary accommodation and link its use to the housing need in the borough. They requested the policy reflect two pieces of guidance from Morris + Co on how to build suitable emergency accommodation for young people and families.</p>	<p><b>Emergency Accommodation</b></p> <p>We did not consider this change to be necessary as the Strategic Housing Market Assessment considered the number of people in the borough living in temporary accommodation, and factored it into the assessment of need for different types of homes in Newham, including social rent. Policy H2 provides an exception to allow the conversion of family housing, for a temporary period, to meet the need of homeless single people in the borough for the sole use of Newham's Temporary Accommodation service. Furthermore, policies H3 and H4 provide more affordable and family homes in Newham, while Policy H11 seeks to ensure new housing in the borough is high quality, regardless of tenure or contract by which they are rented. The Council is satisfied that the plan is sound without the proposed changes.</p>
<b>Green and Water Spaces</b>		
<b>GWS1: Green spaces</b>	<p><b>General Support</b></p> <p>This policy approach was broadly supported by two residents, three developers (The Silvertown Partnership LLP, St William Homes LLP and Ballymore), three community groups (Aston Mansfield, Gasworks Docks Partnership and One Newham), the Environment Agency, Sport England and Lee Valley Regional Park Authority.</p> <p><b>Newham publicly accessible green space standard</b></p> <p>One community group (One Newham) and the CPRE challenged the Local Plan to be more ambitious regarding the amount of green space per head of population.</p>	<p><b>General support</b></p> <p>Support for the policy is welcomed.</p> <p><b>Newham publicly accessible green space standard</b></p> <p>A change to this policy approach has not been made. We did not consider this change to be necessary as the requirement publicly accessible green space has been justified by up to date evidence base, through Newham's Green and Water Infrastructure Strategy. It has determined that the overall provision of publicly accessible green space in Newham is low, with a rate of just 0.72 hectares per 1,000 residents, far below neighbouring boroughs. The borough currently also experiences shortfalls in areas for community and food growing and play space. Green space is also unevenly distributed across the borough and residents can have very different experiences when</p>

	<p>trying to access open space where they live.</p> <p>Over the Plan period, Newham's population is projected to increase by just over 25 per cent. Assuming that publicly accessible green space provision remains the same (i.e. current provision is sustained and no new publicly accessible greenspace sites are added) publicly accessible greenspace in Newham will fall to 0.57 hectares per 1,000 residents in 2038. If Newham is to enjoy the same, or greater, level and quality of provision over the Plan period, we need to deliver more publicly accessible green space. Just to sustain provision at the 2023 standard we will need to create 68 hectares of additional publicly accessible green space. The Green and Water Spaces Infrastructure Strategy has provided up-to-date evidence to support the Green and Water spaces chapter and its targets. It has mapped Newham's existing green and water spaces and set out where we can make improvements to deliver an enhanced network of spaces. The mapping behind the Strategy has established that the provision of publicly accessible greenspace should not fall below 0.72 hectares per 1,000 Head of Population. Given the projected population increase, this is considered to be an ambitious but realistic level of publicly accessible greenspace provision.</p> <p>The Local Plan therefore seeks to protect all existing green space (including spaces not designated on the Policies Map), maintain the quality and distribution of spaces; as well as creating new space to meet the additional demand from new development. The Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>Exceptional circumstance for building on green space</b> One developer (St William Homes LLP) and an education institution (Newham Sixth Form College) objected to the term 'exceptional circumstances' in clause 3 for any development on green space and the exclusion of Green Belt and Metropolitan Land from this clause.</p> <p><b>Exceptional circumstance for building on green space</b> A change to this policy approach has not been made. We did not consider this change to be necessary as the requirement publicly accessible green space has been justified by up to date evidence base, through Newham's Green and Water Infrastructure Strategy.</p>
--	--

	<p>One community group (PEACH) objected to the exceptional circumstances in clause 3 towards developing on green space associated with housing estates.</p> <p><b>Biodiversity Net Gain</b> One developer (St William Homes LLP) objected to clause 4 of the policy, which specifies that Biodiversity Net Gain should be delivered in a way which meets local need.</p>	<p>We did not consider this change to be necessary as the criteria at Policy point GWS1.3 provides a list of 'exceptional circumstances' where development on green space is supported where it is considered to deliver a benefit to those living in Newham whilst also improving the use and quality of the borough's green space. Clause 1.b of Policy GWS1 sets out the approach to Metropolitan Open Land and Green Belt, which should meet London Plan (2021) and national Green Belt policy - which use the term 'very special circumstances' in relation to Green Belt.</p> <p>The Green and Water Infrastructure Strategy recognises that Parks, gardens, allotments and play areas improve quality of life and help to establish the character of a housing estate for recreation, sport, gardening and social interaction. Clause 3 sets out that developments on green space (excluding Metropolitan Open Land and Green Belt) will only be supported in exceptional circumstances where it is communal amenity land on existing housing estates, where it can be demonstrated that the reconfiguration of the site would deliver both improved biodiversity and functional open space value for the residents.</p> <p>The Local Plan seeks to protect all existing green space (including spaces not designated on the Policies Map), maintain the quality and distribution of spaces; as well as creating new space to meet the additional demand from new development. The Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>Biodiversity Net Gain</b> A change to this policy approach has not been made. We did not consider this change to be necessary as clause 4 aligns with national legislation and government guidance. Natural England and the Environment Agency are supportive of this element of the policy. Indeed, the Planning Advisory Service (PAS), in its Biodiversity Net Gain (BNG) guidance for Local Planning</p>
--	--	---

	<p>Authorities, sets out that a locally-specific BNG policy can help to ensure that BNG contributes to wider nature recovery plans in addition to local objectives. It can help ensure that the right habitats are provided in the right places. As set out on Defra's website: 'Through biodiversity net gain, LPAs can secure local areas in which nature can thrive. In turn, this provides green space for their communities, with all the mental and physical benefits that brings. Plus, these new habitats can also help to improve things like flood resilience and air quality'. The Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>Approach to green space designations</b> CPRE set out that it wanted to see the Local Plan designating all key public parks and open spaces as Local Green Space to ensure they are protected into the future.</p> <p>One resident questioned the approach to green space mapping and expressed concern that a number green spaces were missing from the Policies Map.</p>	<p><b>Approach to green space designations</b> A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan seeks to protect green space through Policy GWS1. The policy protects all existing open green space (including spaces not designated on the Policies Map), maintain the quality and distribution of spaces; as well as creating new space to meet the additional demand from new development. The Council is satisfied that the plan remains sound without the proposed changes.</p> <p>A change to this policy approach has not been made. We did not consider this change to be necessary as the designation of green space is justified by up to date evidence. Newham's Green and Water Spaces Infrastructure Strategy has looked at all of the borough's green and water spaces and sought to regularise our approach to green space designation.</p> <p>Schools and education sites are not included in the strategies publicly accessible green space mapping. The additional spaces listed in the response are considered amenity green space. However, as set out in the implementation to Policy GWS1, the Local Plan seeks to protect all existing green space, including these spaces which are not designated on the Policies Map. The Council is satisfied that the plan is sound without the proposed changes.</p>
--	---	--

	<p><b>Green space designation – mapping corrections</b> Newham Sixth Form College objected to the designation of green space on site allocation N10.SA2 Newham 6th Form College.</p> <p>One developer (St William Homes LLP) sought a modification to the mapping on the Key Diagram and Policies Map, regarding the site allocation N13.SA3 Former East Ham Sports Ground Leigh Road East Ham, which incorrectly indicated some previously developed land as being green space.</p> <p><b>Objection to green space designation</b> Three developers (ExCel and Mount Anvil, Abrdn and The Silvertown Partnership LLP) and Thames water objected to a site specific green space designation. The following sites are subject to a green space objection:</p> <ul style="list-style-type: none"> <li>• N2.SA5 Excel Western Entrance</li> <li>• N17.SA1 Beckton Riverside</li> <li>• N2.SA1 Silvertown Quays</li> </ul>	<p><b>Green space designation – mapping corrections</b> The mapping error on site allocation N10.SA2 is noted. This has been rectified by making the following mapping change:</p> <p><b>Correct green space at Newham 6th Form College on Policies Map - remove green space designation</b></p> <p><b>Correct green space at Newham 6th Form College on Key Diagram - remove green space designation</b></p> <p>However, please note that as set out in the implementation to Policy GWS1, the Local Plan seeks to protect all existing green space, including these spaces which are not designated on the Policies Map.</p> <p>The mapping error on site allocation N13.SA3 is noted. This has been rectified by proposing the following mapping change:</p> <p><b>Correct green space at N13.SA3 Former East Ham Gasworks on Key Diagram</b></p> <p><b>Correct green space at N13.SA3 Former East Ham Gasworks on Policies Map</b></p> <p><b>Objection to green space designation</b> A change to this policy approach has not been made. We did not consider this change to be necessary as scale and type of play space needed on site allocations has been justified by up to date evidence base, through Newham’s Green and Water Infrastructure Strategy.</p> <p>Development will be assessed, where relevant, against the requirements set out in a site allocation and Local Plan Policy GWS1. It should be noted that clause 1 of GWS1 requires major development to demonstrate an integrated</p>
--	--	--



	<ul style="list-style-type: none"> <li>Abbey Mills Pumping Station</li> </ul>	<p>approach to green infrastructure in a Design and Access Statement. In addition, Policy BFN2 requires sites to be designed and developed comprehensively, with major applications undertaking co-designed masterplanning. As such, the Local Plan clearly advocates and supports a masterplan-led approach.</p> <p>The quantity and type of green space stipulated in the Local Plan's site allocations has been justified by up to date evidence base, through Newham's Green and Water Infrastructure Strategy. The specific detail regarding how that green space is designed and delivered, across the site allocation, will be determined by a co-design masterplan-led approach ahead of and during the pre-application and application stage.</p> <p>Regarding the green space designation at Abbey Mills Pumping Station, we did not consider a change to be necessary as the green space is a designated Local Open Space in the adopted LLDC Local Plan (2020). All green spaces were appraised in Newham's Green and Water Infrastructure Strategy. The Mill Mead allotments remain to be a green space and functioning allotment.</p> <p>The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 15 allotments and community growing spaces with a total area of 17.86 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.05 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity.</p> <p>The Green and Water Space policies would not prohibit the use of this site for future upgrades to essential sewerage infrastructure should certain</p>
--	---	---

	<p><b>N2.SA5 Excel Western Entrance – clarity regarding the opportunity for green space</b></p> <p>One developer (ExCel and Mount Anvil) objected to the use of the term ‘opportunity for green space’ in the N2.SA5 Excel Western Entrance site allocation.</p>	<p>policy criteria be met. The need for this site to be the location for sewage infrastructure would be assessed at the point an application is brought forward. The Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>N2.SA5 Excel Western Entrance – clarity regarding the opportunity for green space</b></p> <p>The Council’s objective for this policy approach is to increase public access to and enhancing the functionality and flexibility, while retaining the quantity of existing green and open space. This is a key part of the N2 Royal Albert North neighbourhood vision and is justified by up to date evidence, having been informed by Newham’s Green and Water Infrastructure Strategy. The development principles for each allocation set out the requirements that need to be met on site and the site allocation map provides an illustrative representation of how this could be delivered.</p> <p>However, the Council recognises the importance of ensuring the Plan is clear and has therefore made the following wording changes:</p> <p>N2.SA5 Development Principles: Development should retain and enhance the existing open space along the waterfront edge and reconfigure Royal Victoria Square <del>to be reconfigured</del> at the east of the site creating an inviting entrance to the Excel conference centre site, <b>in accordance with Local Plan GWS1.</b></p> <p>N2.SA5 Infrastructure Requirements: Development should protect existing open space and address open space deficiency by reproviding and enhancing Royal Victoria Square Civic Space as a consolidated <b>and flexible</b> open space. The <b>consolidated open space should retain the existing quantity of open space, while enhancing its functionality and exploring the opportunity for retaining original design</b></p>
--	--	--

	<p><b>Newham Hospital</b> NHS North East London objection to the designation of green space on the Newham Hospital site.</p>	<p><b>features of heritage value.</b> The open space provision should prioritise community growing opportunities.</p> <p>Which are included in the modification table.</p> <p><b>Newham Hospital</b> This comment has been subject to further discussion with NHS North East London. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report.</p> <p>A change to this policy approach has not been made. We did not consider this change to be necessary as this policy approach is justified by up to date evidence base, through the Green and Water Infrastructure Strategy. It has determined that the overall provision of publicly accessible green space in Newham is low, with a rate of just 0.72 hectares per 1,000 residents, far below neighbouring boroughs. The borough currently also experiences shortfalls in areas for community and food growing and play space.</p> <p>As set out in paragraph 3.200 of the Local Plan, green infrastructure provides 'a significant range of benefits (often described as 'ecosystem services'), enhancing the health and wellbeing of people living in the borough, supporting Newham's economy by making the borough an attractive place to live and work and helping to address the twin challenges of the climate change and biodiversity emergencies. Newham's Just Transition Plan (2023) and the borough's health and wellbeing strategy, Well Newham, 50 Steps to a Healthier Borough (2024) recognise the important role open spaces play in helping address the climate emergency and improving our health and wellbeing.</p> <p>We consider that the Local Plan is sufficiently flexible to enable development at Newham Hospital, while also delivering access to green and</p>
--	--	---

	<p><b>West Ham Nursery</b></p> <p>The CPRE set out that West Ham Park should be designated as a Local Green Space in its entirety, including the nursery site.</p> <p>One community group (One Newham) and one resident supported the designation of the site as green space.</p> <p>The City of London objected to the designation of West Ham Nursery Site as a green space under the sub-category of ‘community growing space’. It also critiqued the methodology and findings in Newham’s Green and Water Infrastructure Strategy (2024). It contends that the site is previously developed land.</p>	<p>water space. Policy GWS1 seeks to deliver easy access to a network of high-quality green spaces. Clause 1 of GWS1 requires major development to demonstrate an integrated approach to green infrastructure in a Design and Access Statement.</p> <p>Policy BFN2 requires sites to be designed and developed comprehensively, with major applications undertaking co-designed masterplanning. As such, the Local Plan clearly advocates and supports a masterplan-led approach. The specific detail regarding how green space is designed and delivered, across a development site, will be determined by a co-design masterplan-led approach ahead of and during the pre-application and application stage. Clause 3 of Policy GWS1 sets out the exceptional circumstances where development on green spaces will be supported. This is considered to be proportionate and balanced approach. The Council is satisfied that the plan is sound without the proposed changes.</p> <p><b>West Ham Nursery</b></p> <p>The Council’s objective for this policy approach is to ensure the Local Plan positively prepared, protecting, enhancing and delivering a network of accessible green space, to meet the needs of the population both now and over the plan period (to 2038). The West Ham Nursery site forms part of the wider Historic England West Ham Park, Grade II Park and Garden site national designation. Being on the Register means that the West Ham Nursery site is subject to a statutory designation, and has the same weight in policy terms under the National Planning Policy Framework (NPPF) as scheduled monuments and listed buildings. In NPPF terms, it is a ‘designated heritage assets’.</p> <p>As such, and after internal legal advice, we consider that the West Ham Nursery site's designated heritage asset status, which is a material consideration in the planning process, provides the necessary protection required. The Council recognises the importance of ensuring the plan is positively prepared and therefore has drafted the following modification,</p>
--	---	--

	<p><b>Approach to Metropolitan Open Land / Green Belt</b> One community group (Aston Mansfield) requested this policy to be amended to reflect the Newham Metropolitan Open Land Review 2024 which recommended some changes to MOL boundaries.</p> <p>Lee Valley Regional Park Authority supported the removal of the Lee Valley Velodrome from the wider Olympic Park MOL designation</p> <p>Thames Water sought the removal of the whole of the Northern Lagoon area at Beckton Sewage Treatment Works from its Metropolitan Open Land designation.</p> <p>West Ham United Football Club sought the removal of land around the London Stadium from its Metropolitan Open Land designation.</p>	<p>which will be presented to the examiner for their consideration, to the Policies Map:</p> <ul style="list-style-type: none"> <li>• <b>Remove proposed community growing space allocation at West Ham Nursey Site.</b></li> </ul> <p>The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for development coming forward on this site. Any application would be assessed on its statutory heritage designation and against the policies in the adopted Local Plan</p> <p><b>Approach to Metropolitan Open Land / Green Belt</b> A change to this policy approach has not been made. We did not consider this change to be necessary as the Metropolitan Open Land designations in the Local Plan are justified by up to date evidence. Newham's MOL Review and any proposed deletions or amendments to MOL are reflected in this evidence base and the Policies Map. Please note Newham's MOL Review (2025) includes an update to amend an error not related this comment. The Council is satisfied that the plan remains sound without the proposed changes</p> <p>Support is welcomed.</p> <p>A change to this policy approach has not been made. We did not consider this change to be necessary as the Green and Water Space policies would not prohibit the use of this site for future upgrades to essential sewerage infrastructure should certain policy criteria be met. The need for this site to be the location for sewerage infrastructure would be assessed at the point an application is brought forward. The Council is satisfied that the plan remains sound without the proposed change.</p>
--	--	--

	<p>One community group (Aston Mansfield) sought to remove the Metropolitan Open Land designation on Lady Trower Trust Playing Fields.</p> <p><b>Grey Belt</b> West Ham United Football Club and one community group (Aston Mansfield) made the case for Metropolitan Land being akin to grey belt.</p> <p><b>Maintenance of green space</b> Four developers (Ballymore, Hadley, The Silvertown Partnership and St William Homes LLP) raised concerns regarding clause 5 of Policy GWS1 which requires all new open space which will function as a local park to be transferred into the Council's ownership together with a commuted sum to cover the cost of maintenance over a 15 year period.</p> <p>Two residents raised concerns regarding how green space would be managed and maintained.</p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as this is a site designated as MOL in the LLDC's adopted Local Plan (2021). The designation is further justified by up to date evidence base, through Newham's Metropolitan Open Land Review.</p> <p>A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council's response has not changed.</p> <p><b>Grey Belt</b> A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan will be examined under the 2023 NPPF. Therefore, concerns regarding an interpretation of grey belt and its potential relevance to this site or its application to London Plan Metropolitan Open Land are not relevant to the examination of this Local Plan. The Council is satisfied that the plan is sound without the proposed changes.</p> <p><b>Maintenance of green space</b> A change to this policy approach has not been made. We did not consider this change to be necessary as clause 5 of Policy GWS1 sets out that it is expected that new green space on site allocations or space which will function as a local park will be transferred into the Council's ownership. A commuted sum, to cover the cost of maintenance over a period of 15 years, will be secured through a legal agreement. Where it is agreed that the publicly accessible green space will not be adopted, a Management Plan should be provided which demonstrates how the requirements of the Public London Charter principles will be met and secured.</p> <p>Policy GWS1 addresses the need to protect and deliver more green space. The findings of the Green and Water Infrastructure Strategy have been used</p>
--	--	---

		to inform the site allocation and specific needs for green space, growing space and play space have been set out in their infrastructure requirements. The Council is satisfied that the plan is sound without the proposed changes.
<b>GWS2: Water spaces</b>	<p><b>General Support</b> This policy approach was broadly supported by one developer (St William Homes LLP), Natural England, the Environment Agency, Sport England and Lee Valley Regional Park Authority.</p> <p><b>Approach to the Royal Docks</b> The Royal Docks Team, Royal Docks Management Authority and four developers (ExCel, Mount Anvil, Good Hotel and Silvertown Partnership LLP) called for there to be a standalone policy in the Local Plan to address development in the Royal Docks.</p>	<p><b>General Support</b> Support for the policy is welcomed.</p> <p><b>Approach to the Royal Docks</b> The Council's objective for Policy GWS2 is to address the need to protect and enhance the borough's water spaces. Area specific spatial planning issues, such as the future development at the Royal Docks, are addressed in the Neighbourhoods section of the Local Plan. It should be noted the GLA has not raised any conformity concerns with Policy GWS2 and its approach to water-related uses, nor did it request a standalone policy for the Royal Docks to be included in this section of the Local Plan.</p> <p>However, the Council recognises the importance of ensuring the Plan is positively prepared and reflects the aspirations we have for the development in the Royal Docks to embrace and celebrate the unique features of the water space the docks provide and therefore has drafted the following modifications, which will be presented to the examiner for their consideration:</p> <p>N1: North Woolwich</p> <p><b>15. maximising opportunities for improving the functionality, connectivity, quality, and accessibility of the historic Royal Docks, King George V Dock and Royal Albert Dock, by protecting and enhancing these water spaces and access to them. Celebrating the unique character of the docks,</b></p>

		<p>enhancing the environmental quality of the waterscape and, where appropriate, supporting suitably located and scaled waterfront amenities and activation for water-related or water-dependant facilities;</p> <p>AND</p> <p>N2: Royal Victoria</p> <p><b>14. maximising opportunities for improving the functionality, connectivity, quality, and accessibility of the historic Royal Victoria Dock by protecting and enhancing the water spaces and access to them. Celebrating the unique character of the docks, enhancing the environmental quality of the waterscape and, where appropriate, supporting suitably located and scaled waterfront amenities and activation for water-related or water-dependant facilities;</b></p> <p>AND</p> <p>N3: Royal Albert North</p> <p><b>14. maximising opportunities for improving the functionality, connectivity, quality, and accessibility of the historic Royal Docks, King George V Dock and Royal Albert Dock, by protecting and enhancing these water spaces and access to them. Celebrating the unique character of the docks, enhancing the environmental quality of the waterscape and, where appropriate, supporting suitably located and scaled waterfront amenities and activation for water-related or water-dependant facilities;</b></p>
	Water activation / water-dependent uses	Water activation / water-dependent uses



	<p>The Royal Docks Team, the Royal Docks Management Authority, the Environment Agency and two developers (Good Hotel and ExCel and Mount Anvil) requested more clarity regarding the policy approach water-related activation, water-dependant uses and the loss or covering of water space.</p>	<p>Comment noted. This comment has been subject to further discussions with the Environment Agency and a satisfactory resolution has been found. The Statement of Common Ground with the Environment Agency has been included in the updated Duty to Cooperate Report. In light of these comments, the Council recognises the importance of ensuring the Plan is clear regarding what we consider to be appropriate water-related or water-dependent development and therefore has drafted the following modification, which will be presented to the examiner for their consideration, to Policy GWS2:</p> <p>2. Development affecting and/or adjacent to water space should improve the existing water space network, including navigation, biodiversity (including riparian trees and wet woodland), water quality, visual amenity, character, and heritage value. This will be achieved through:</p> <p>...</p> <p><b>c. maximising opportunities for water space restoration, including opportunities to open culverts, naturalise river channels, protect and improve the foreshore, floodplain, riparian and adjacent terrestrial habitats and water quality; and</b></p> <p><b>de. requiring no encroachment-loss or covering of any water space unless it is a water-related or water dependent use. Development proposals to impound or narrow water spaces will not be supported; and ...</b></p> <p>The following wording change, to implementation point GWS2.2 is included in the modification table to ensure clarity and consistency with London Plan Policy SI 17:</p> <p><b>Loss-Encroachment</b></p> <ul style="list-style-type: none"> <li>• Overshadowing reduces the recreational and biodiversity value of water space. Development in proximity to water space should not result in <b>the</b></li> </ul>
--	--	---

		<p><b>encroachment less or covering of water space unless for a water-related or water-dependant uses. Ancillary water-related or water-dependant uses, such as cultural, sport or recreation facilities, can support the enhancement of water space and public realm. The siting of such facilities needs careful consideration so that navigation, hydrology, biodiversity and the character, access to, and use of waterways is not compromised. Water space should not be used as an extension of developable land in Newham, nor should parts be a continuous line of moored craft.</b></p> <p><b>There should be no loss of water space through culverting or encroachment. Opportunities to de-culvert should be explored and implemented where feasible.</b> <del>and demonstrate that it will not compromise the suitability of the water space for water-related uses.</del></p> <p>The following wording change, to implementation point GWS2.3 is included in the modification table to ensure clarity and consistency with London Plan Policy SI 17:</p> <p>When assessing planning applications, consideration will be given to the water coverage and human experience of the openness of water space in terms of its visibility and visual connections across the water from the surrounding public realm. The Built Leisure Needs Assessment (2024) provides an understanding of water-related leisure activities in Newham and the need for theses uses over the Local Plan period. <b>Water related or water-dependant use could include low lying floating structures that allow people to have closer access to and enjoyment of the water space. Water related or water-dependant facilities could also include suitably located ancillary and enabling structures such as showers or changing facilities.</b></p> <p><b>Small technical amendments</b></p> <p>A small number of changes have been made to the policy to ensure it is fully comprehensive and directly reflects national policy.</p>
	Small technical amendments	

	<p>The Environment Agency were supportive of the policy but requested that some small technical amendments be made to the policy to provide clarity:</p> <ol style="list-style-type: none"> <li>1. Ensuring the policy considers how to improve the water space environment</li> <li>2. Watercourse units in the approach to Biodiversity Net Gain.</li> <li>3. Reference to impact on flood risk for applications for water-related or water-dependent facilities on or adjacent to water spaces.</li> <li>4. Reference to flood risk for applications for residential and visitor moorings.</li> <li>5. Include additional detail on setbacks for intertidal/tidal waters.</li> <li>6. Reference the Environment Agency as a key stakeholder in the implementation section for Policy GWS2.2 on accessibility.</li> <li>7. Strengthen the approach to the implementation text to GWS2.2, for it to 'require' and not 'encourage' river re naturalisation.</li> <li>8. Provide guidance on new Clipper/Ferry services.</li> </ol>	<p>The following are the changes that have been made and which are included in the modification table:</p> <ol style="list-style-type: none"> <li>1. We have made the following wording change to GWS2.2: <ul style="list-style-type: none"> <li>2. Development affecting and/or adjacent to water space should improve the existing water space network, including navigation, biodiversity (including <b>undeveloped areas of riparian buffer zone</b>, riparian trees and wet woodland), water quality, visual amenity, character, and heritage value. This will be achieved through:</li> </ul> </li> </ol> <p>The Council has drafted the following modifications, which will be presented to the examiner for their consideration:</p> <ol style="list-style-type: none"> <li>2. Implementation text for Policy GWS2: <p>Biodiversity</p> <ul style="list-style-type: none"> <li>• Schemes should maximise opportunities to incorporate existing habitats and vegetation.</li> <li>• <b>Ensure watercourse Biodiversity Net Gain units are considered if a proposed development is within 10m of a watercourse, see Local Plan Policy GWS3 for further detail on delivering Biodiversity Net Gain.</b></li> <li>• Planting should include only species suited to the on-site conditions (types and maturities) and be managed appropriately to achieve maximum benefit for biodiversity and river health. Invasive non-native species must be avoided, and where possible, reduced.</li> <li>• External lighting should be designed to minimise light pollution and disruption to habitats and species. Low-level LED lighting with warmer colour temperatures with peak wavelengths greater than 550nm (~3000°K) should be used as these have been shown to cause less impacts on bats.</li> </ul> </li> </ol>
--	--	---

		<p>3. Policy GWS2.3:</p> <p>b. it can be demonstrated that the activation of the water space is appropriately scaled and located and does not negatively impact on navigation, <b>flood risk</b>, ecological value, water quality, the openness and character of the water space and the amenity of surrounding resident</p> <p>4. Policy GWS2.4:</p> <p>b. it can be demonstrated that residential and visitor moorings are appropriately located and do not negatively impact on navigation, <b>flood risk, ecological value</b>, water quality, the openness and character of the water space and the amenity of surrounding residents.</p> <p>Some changes were not made, where it was considered there was already suitable references made in other parts of the Local Plan, policy or implementation text.</p> <p>5. A change to this policy approach has not been made. We did not consider this change to be necessary as Policy CE7: Managing flood risk, addresses this point and the Plan should be read as a whole. The Council is satisfied that the plan is sound without the proposed change.</p> <p>6. A change to this policy approach has not been made. We did not consider this change to be necessary as the Council refers to the need to engage with key stakeholders in the implementation text to support clause 1 of Policy GWS2. This includes reference to the need to engage with the Environment Agency. The Council is satisfied that the plan is sound without the proposed change.</p>
--	--	--

	<p><b>Reference to the Royal Docks Team and GLAP</b> The Royal Docks Team wanted to see reference to GLAP and the Royal Docks Team.</p>	<p>7. This comment has been subject to further discussion with Environment Agency and a satisfactory resolution has been found. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report. Both parties are satisfied that the plan remains sound without these changes.</p> <p>8. This comment has been subject to further discussion with Environment Agency and a satisfactory resolution has been found. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report. Both parties are satisfied that the plan remains sound without these changes.</p> <p><b>Reference to the Royal Docks Team and GLAP</b> Comment noted.</p> <p>The Council's objective for this policy approach is to deliver a network of improved, high-quality water spaces. However, the Council recognises the importance of ensuring the Plan is clear and therefore has made the following wording change:</p> <p>GWS2.4 implementation text:</p> <p>We will work in partnership with the Port of London Authority and the Canal and River Trust, RoDMA, the Environment Agency, <b>the GLA</b> and other appropriate authorities and stakeholders, to determine the suitability of residential and visitor moorings. In coming to a decision, we will with consider:</p> <ul style="list-style-type: none"> <li>• Navigation,</li> <li>• Water quality,</li> <li>• Biodiversity,</li> </ul>
--	---	---

		<ul style="list-style-type: none"> <li>• Openness and character of the water space and surrounding area,</li> <li>• Surrounding residential amenity,</li> <li>• The adequate provision of supporting uses and facilities, including: <ul style="list-style-type: none"> <li>- Waste management (for example rubbish and sewage disposal)</li> <li>- Supply of adequate electricity including for heating (see Local Plan Policy CE6)</li> <li>- Supply of fresh water</li> </ul> </li> </ul> <p>AND</p> <p>GWS2.1 implementation text:</p> <p>Early engagement, with appropriate key stakeholders is encouraged. Timely engagement is important, it helps to ensure proposed developments align with wider priorities and these strategies. Development proposals in proximity to water space should incorporate work with the Council and our partners (including the Port of London Authority, the Canal and River Trust, Royal Docks Management Authority (RoDMA), the London Lea Catchment Partnership, Beam and Ingrebourne Catchment Partnership, <b>the GLA</b> and the Environment Agency), landowners and the community.</p>
<b>GWS3: Biodiversity, urban greening, and access to nature</b>	<p><b>General Support</b> This policy approach was broadly supported by Natural England, the Environment Agency, two developers (SEGRO and The Silvertown Partnership) two community groups (One Newham and Aston Mansfield).</p> <p><b>Approach to protecting existing habitats and features of biodiversity value and Sites of Importance to Nature Conservation</b> One developer (St William Homes LLP) considers this policy to not be effectively prepared and stated that it therefore</p>	<p><b>General Support</b> Support for the policy is welcomed.</p> <p><b>Approach to protecting existing habitats and features of biodiversity value and Sites of Importance to Nature Conservation</b> A change to this policy approach has not been made. We did not consider this change to be necessary as the policy approach is justified by up to date evidence base, through Newham's Green and Water Infrastructure Strategy</p>

	<p>fails to meet the tests of soundness set out in the NPPF. This developer objected to the requirement to replace lost habitats and features of biodiversity value within the development site and sought to introduce greater flexibility to clause 1a to reflect this concern. The same developer sought to amend clause 3, to remove the requirement for development, in areas which are deficient in access to nature, to deliver new or improved green or water spaces which have intrinsic nature conservation value that would qualify as a Borough Site of Importance for Nature Conservation.</p> <p>One community group (Aston Mansfield) sought to introduce greater flexibility to clause 6 and the approach to Sites of Importance to Nature Conservation. It considered clause 6 implied a blanket protection of Sites of Importance for Nature Conservation.</p> <p><b>Biodiversity Net Gain</b> One developer (St William Homes LLP) objected to clause 4, and specifically the approach to the hierarchy which states that ‘...out of borough sites will only be considered where it can be demonstrated that there are insufficient sites and credit schemes in the Borough to deliver the required net gain’.</p> <p><b>Sites of Importance for Nature Conservation (SINC) designation- objection</b></p>	<p>and Newham's SINC Review. Green and water infrastructure provision across Newham is poor relative to other London Boroughs. Newham's green and water infrastructure delivers essential ecosystem services to the Borough. These benefit flows need to be sustained if Newham's ecology and the people living and working there are to thrive. Clause 1 of Policy GWS3 acknowledges that natural features may be lost though development but that these need to be replaced within the development site. This policy approach is supported by Natural England. The Council is satisfied that the plan remains sound without the proposed changes. The approach to GWS3, including clause 1.a and clause 3, is supported by Natural England and the Environment Agency.</p> <p>A change to clause 6 has not been made. We did not consider this change to be necessary as the clause clearly sets out the hierarchy which should be applied to development which would harm a Site of Importance for Nature Conservation. The hierarchy includes the delivery of off-site compensation, in Newham, of better biodiversity value. This policy is supported by Natural England and the Environment Agency. The Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>Biodiversity Net Gain</b> A change to this policy approach has not been made. We did not consider this change to be necessary as clause 4 of Policy GWS3 clearly sets out the hierarchy which should be applied to the delivery of Biodiversity Net Gain (BNG). The hierarchy includes the delivery of BNG off-site. This policy is supported by Natural England. The Council is satisfied that the plan remains sound without these changes.</p> <p><b>Sites of Importance for Nature Conservation (SINC) designation</b> The Council's objective for this policy approach is to protect and enhance access to Sites of Importance for Nature Conservation (SINC). The policy</p>
--	---	---

	<p>One developer (Ballymore), Thames Water and London City Airport objected to a SINC designation. The following sites are subject to a SINC objection:</p> <ul style="list-style-type: none"> <li>• Bridgewater Road N8.SA8</li> <li>• Beckton Sewage Treatment Works</li> <li>• London City Airport – Royal Docks SINC</li> </ul>	<p>approach has been justified by up to date evidence base, Newham's Sites of Importance for Nature Conservation Review.</p> <p>An assessment of Newham's SINC's was undertaken between June-August 2022 to inform the Local Plan. This involved a desk-top review of existing information about Newham's SINC's (including those within the area currently administered by the London Legacy Development Corporation) and analysis of aerial imagery followed by site visits to existing SINC's and other sites identified by the desk-top study. The specific purpose of the Newham SINC review was to:</p> <ul style="list-style-type: none"> <li>• Review the current SINC's and identify potential changes to boundaries or status, and justify these changes as necessary.</li> <li>• Identify and justify potential new SINC's to reduce areas of deficiency, contribute to strategic green corridors or complement existing SINC's.</li> </ul> <p>Newham took the SINC Review (2022) to the September 2023 London Wildlife Sites Board. At this meeting, the work was praised for its quality and thoroughness. There was unanimous agreement from the Board to approve the Newham SINC Review (2022).</p> <p>Newham's SINC review made amendments to the extent of the SINC NEB16 The Greenway, which runs along the southern boundary of the N8 SA8 Bridgewater Road site allocation. However, the Council recognises the importance of ensuring the SINC Review is clear to use. Therefore, Newham's SINC Review (2025) includes an update to amend the scale of the Greenway SINC mapping (SINC NEB16) to make it more legible to the reader.</p> <p>A response to the comment regarding Beckton Sewage Treatment Works was provided in the Regulation 18 Local Plan Consultation Report. The Council's response has not changed.</p> <p>In light of comments on London City Airport, the Council recognises the importance of ensuring the Plan is clear and the error on the Key Diagram</p>
--	---	--



	<p>and Policies Map is noted. The Council proposes to support your suggested mapping change to the Key Diagram and the Policies Map, both of which will be presented to the examiner for their consideration. This change will also be reflected in the Green and Water Infrastructure Strategy 2025 and Newham's Sites of Importance for Nature Conservation Review (2025).</p> <p><b>Correct City Airport SINC on Key Diagram</b>  <b>Correct City Airport SINC on Polices Map</b></p> <p><b>Epping Forest Special Area of Conservation (SAC)</b>  Natural England supported the approach to Epping Forest SAC mitigation.</p> <p>Natural England proposed an amendment to the policy to state that the Council will only permit development where it is satisfied that it will not give rise to adverse effects on integrity of Epping Forest SAC either alone or in-combination.</p> <p>One developer (St William Homes LLP) objected to the need to meet both the SAC and SANG tariff.</p>	<p><b>Epping Forest Special Area of Conservation (SAC)</b>  Support for the policy is welcomed. A change to this policy approach has not been made. We did not consider this change to be necessary as the impact of development on Epping Forest Special Area of Conservation (SAC) will be mitigated through developments, in the 6.2km ZOI, making a financial contribution to the two tariffs set out in clause 7 of Policy GWS3.</p> <p>We did not consider a change to the approach to the tariffs to be necessary as Policy GWS3 is justified by up to date evidence base, through Newham's Epping Forest Special Area of Conservation Recreation Mitigation Strategy (2025) and The Epping Forest Strategic Access Management and Monitoring Strategy (2022). The Council has a legal duty to ensure that planning application decisions comply with the Habitats and Conservation of Species Regulations 2017 (as amended) to protect the integrity of Epping Forest SAC. Local authorities, such as Newham, falling within a 6.2km recreational zone of influence, are required to collect financial planning obligations to mitigate the harmful impacts by visitors to Epping Forest SAC. Natural England's position remains that all development leading to a net increase in residential units within 6.2km of Epping Forest SAC should provide contributions to both SAMM and SANG. The Council is satisfied that the plan is sound without the proposed changes.</p>
--	---	--

	<p><b>London City Airport</b>  London City Airport stated that clause 1.e should be redrafted to ensure aviation safety takes precedent over biodiversity measures. It wanted the policy to be amended to state:</p> <p>e. where an aviation safety case allows, allowing biodiversity enhancement measures within the London City Airport Safeguarded Area.”</p> <p><b>Small technical amendments</b>  The Environment Agency were supportive of the policy but requested that some small technical amendments be made to the policy to provide clarity:</p> <ol style="list-style-type: none"> <li>1. Reference to be made to Natural England’s Green Infrastructure Framework in the implementation text to GWS3.5.</li> <li>2. Amend clause 4, to make reference to the need to secure BNG in in perpetuity (for at least 30 years).</li> <li>3. Amend clause 4, to address the need for development to consider the ecological value of a given site at the conceptual stage of a proposal.</li> </ol>	<p><b>London City Airport</b>  We did not consider this change to be necessary as Policy GWS3 1.e adequately addresses the need to deliver appropriate biodiversity measures within the London City Airport Safeguarded Area. The Council is satisfied that the plan remains sound without the proposed change.</p> <p>However, the Council recognises the importance of ensuring the Plan is clear and therefore proposes the following wording change:</p> <p>e. maximising biodiversity measures within the London City Airport <b>Safeguarded</b> <del>Safe-Guarded</del> Area, whilst also ensuring that the airport is appropriately safeguarded from bird strikes; and</p> <p>which is included in the modification table.</p> <p><b>Small technical amendments</b>  A small number of changes have been made to the policy to ensure it is fully comprehensive and directly reflects national policy. The following change has been made and is included in the modification table:</p> <ol style="list-style-type: none"> <li>1. This comment has been subject to further discussion with the Environment Agency and a satisfactory resolution has been found. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report. In light of these comments, the Council recognises the importance of ensuring the Plan is clear and has therefore made the following wording change:</li> </ol> <p><del>GWS3.5</del>  <b>GWS3.4</b>  Biodiversity Net Gain is an approach to development that leaves biodiversity in a better state than before. Development proposals</p>
--	---	--

	<p>4. Provide additional detail regarding the others benefits that biodiversity net gain can bring, such as improving the water environment and preventing deterioration of water bodies, managing flood risk and addressing climate risks.</p>	<p>must secure a net gain in biodiversity value, with a clear priority for on-site measures. Development should use the latest Department for Environment, Food &amp; Rural Affairs metric to quantify the baseline and post-development biodiversity value of the development site and of-site areas proposed for habitat creation. The assessment should be undertaken by a suitably qualified and/or experienced ecologist and should be submitted together with baseline and proposed habitat mapping in a digital format with the application.</p> <p>Any of-site habitats created should be provided in the borough and be located to maximise opportunities for local nature recovery and to improve access to nature.</p> <p>Biodiversity Net Gain should not applied to irreplaceable habitats. Any mitigation and/or compensation requirements for designated sites should be dealt with separately to Biodiversity Net Gain provision.</p> <p>Applicants should refer to the latest government legislation and guidance and the GLA's Urban Greening for Biodiversity Net Gain: A Design Guide (2021) to ensure proposed green infrastructure achieves a Biodiversity Net Gain.</p> <p><b>Please also see Natural England's Green Infrastructure Framework (GIF): <a href="https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx">https:// designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx</a>. The GI Framework provides a number of tool and guides to complement the mandatory mechanisms of Biodiversity Net Gain (BNG) and Local Nature Recovery Strategies (LNRS), which form part of the Environment Act.</b></p> <p>which is included in the modification table.</p>
--	---	---

	<p><b>Reference to the Lee Valley Regional Park Biodiversity Action Plan</b></p> <p>The Lee Valley Regional Park Authority requested reference to be made to the Authority's Biodiversity Action Plan 2019 – 2029, as part of the Evidence Base list provided for this section of the Plan.</p>	<p>The remaining comments from the Environment Agency seeking additional clarity (2, 3 and 4) have been subject to further discussion with Environment Agency and a satisfactory resolution has been found. It is considered there is already suitable references made in other parts of the Local Plan, policy or implementation text. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report. Both parties are satisfied that the plan remains sound without these changes.</p> <p><b>Reference to the Lee Valley Regional Park Biodiversity Action Plan</b></p> <p>This comment has been subject to further discussion with Lee Valley Regional Park Authority and a satisfactory resolution has been found. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report.</p> <p>In light of these comments the Council recognises the importance of ensuring the Plan is clear. The typo is noted, an update will be made to the evidence base for Policy GWS3 to include reference to the <b>Lee Valley Regional Park, Biodiversity Action Plan, 2019 - 2029 (2019)</b>, which is included in the modification table.</p>
<b>GWS4: Trees and hedgerows</b>	<p><b>General Support</b></p> <p>This policy approach was broadly supported by two developers (The Silvertown Partnership and St William Homes LLP).</p> <p><b>Protection of trees</b></p> <p>One community group (Aston Mansfield) sought to add additional detail to clause 1.a. and clause 3.c, to make specific reference to only protecting and safeguarding existing Category A and B trees.</p>	<p><b>General Support</b></p> <p>Support for the policy is welcomed.</p> <p><b>Protection of trees</b></p> <p>A change to this policy approach has not been made. We did not consider this change to be necessary as Local Plan Policy GWS4 sets out the requirements where there are exceptional circumstances to justify the loss of trees. The Council is satisfied that the plan is sound without the proposed changes.</p>

<b>GWS5: Play and informal recreation for all ages</b>	<p><b>General Support</b> This policy approach was broadly supported by one developer (St William Homes LLP).</p> <p><b>Co-design of play facilities</b> One developer (the Silvertown Partnership LLP) sought clarity on the term ‘co-production’ with local adults, children and young people, parents and carers on the design of new provision early on in the development of an application. It questioned the need for this approach.</p>	<p><b>General Support</b> Support for the policy is welcomed.</p> <p><b>Co-design of play facilities</b> A change to this policy approach has not been made. A change to this policy approach has not been made. We did not consider this change to be necessary as co-design is key to delivering the Council's objective of a People powered Newham and widening participation in the life of the borough and the work that the Council does. Policy BFN2 sets out further detail regarding the Local Plan’s approach to co-design and masterplanning. The implementation text to clause 2 sets out a commitment to review Newham’s Statement of Community Involvement, following the Local Plan adoption, to provide further detail on co-design in planning and development. The Council is satisfied that the plan is sound without the proposed changes.</p>
<b>Climate Emergency</b>		
<b>CE1: Environmental design and delivery</b>	<p><b>Support</b> University College London, Silvertown Partnership and One Newham supported the policy overall.</p> <p><b>Pollution</b> Environment Agency welcomed changes made following comments at Regulation 18.</p>	<p><b>Support</b> Support for the policy is welcomed.</p> <p><b>Pollution</b> Support for the changes made is welcomed.</p>

	<p><b>Water efficiency</b></p> <p>Concern was raised by Thames Water regarding the need for water efficiency measures and how they could be implemented in policy (such as BREEAM). Specific policy wording was suggested, including a 105 litres per head per day requirement.</p>	<p><b>Water efficiency</b></p> <p>No changes to the policy were made as we will not be using BREEAM as a policy criteria, and the policy maintains water efficiency standards (the 105 litres per head per day requirement) as per the 2018 Local Plan and representations from Thames Water at Regulation 18 stage.</p>
<b>CE2: Zero Carbon development</b>	<p><b>Justified and Deliverable</b></p> <p>Some developers supported the overall aim of the policy. Some developers had concerns about the cost, deliverability and implementation of the policy – and trade-offs with other policy requirements such as affordable housing and infrastructure. Other developers had concerns regarding policy thresholds and when the policy would apply. There was also concern regarding the ability of the council to set its own standards, following the December 2023 Written Ministerial Statement.</p> <p>Several developers suggested changes to the policy, including removal of specific targets, removal of student accommodation targets, allow for policy flexibility, or to align the policy with the London Plan.</p> <p><b>Solar PV offset</b></p> <p>Ballymore and Unite had concerns regarding the methodology behind the solar PV offset, requesting that it is set to an affordable level. They also had concerns regarding competing requirements for roof space for other uses.</p>	<p><b>Justified and Deliverable</b></p> <p>Support for the policy is welcomed. No changes to the policy were made, as it is necessary for Newham to meet its climate emergency objectives and the Climate Change Evidence Base demonstrates that the policy is deliverable, viable and achievable. The evidence base included modelling of a variety of buildings to demonstrate this. An assessment of the cost of the energy policy is included in the viability assessment, demonstrating that these policies they are deliverable, in line with the NPPF. Legal advice also sets out that the 2023 Written Ministerial Statement does not change the ability for councils to set their own standards.</p> <p><b>Solar PV offset</b></p> <p>No changes to the policy were made, as the Climate Change Evidence Base demonstrates how the solar PV offset figure was calculated, and the methodology behind it. The Climate Change Evidence Base also considers the trade offs at roof level, demonstrating that targets can be met while allowing some space for other purposes (including plant equipment, private/shared amenity space or biodiversity). The Climate Change Evidence Base demonstrates that the policy is deliverable, viable and achievable.</p>

	<p><b>Gas connections</b> Hadley considered the prohibition of gas connections to be onerous.</p> <p><b>Decarbonisation of heat networks</b> Developers had concerns regarding the policy requirement for the decarbonisation of heat networks, and how this would be achieved in the short term as well as the implications for developers that are contractually obligated to connect to the Olympic Park heat network in the LLDC area. One resident did not support the changes made to the policy between Regulation 18 and 19, which provides flexibility for heat networks to use waste heat and decarbonise over time.</p> <p><b>Data centres</b> IXDS and GLP had concerns regarding how the policy would effect data centres, noting their abnormal energy use requirements. They also noted a requirement for emergency back-up generators, suggesting policy wording.</p>	<p><b>Gas connections</b> No changes to the policy were made, as it is necessary to meet our climate objectives. Alternatives to fossil fuelled powered heating are viable and affordable and are in wide use across the UK.</p> <p><b>Decarbonisation of heat networks</b> No changes to the policy approach were made, with the policy maintaining the objective to move away from heat networks that use fossil fuels. The heat network will not have to be decarbonised at the point of application but a fully funded decarbonisation plan which will be implemented within the lifetime of the Local Plan – must be in place at the point of application. The Council considers that the policy has sufficient flexibility to allow heat networks to decarbonise over time. The Council considers that the policy is compliant with the London Plan, as well as deliverable, viable and achievable.</p> <p><b>Data centres</b> The policy maintains the overall approach that as little as energy as possible should be used to run/heat a building. The policy is clear that the use of waste heat is supported and encouraged but that waste heat would not be considered to be a specific benefit of a scheme unless it pays for the development of heat network infrastructure that would allow waste heat to be delivered. Where a nondomestic development does not have an applicable category of use outlined in the policy (e.g. data centres), the development should discuss with the Council what the EUI target should be at the point of application. Policy wording regarding emergency or back-up generators is already in the Draft Local Plan in the implementation text of Policy CE6.1, and therefore no changes to the policy were made.</p>
--	---	--

	<p><b>Energy Intensive Industries</b></p> <p>Tate and Lyle had concerns that the policy could have unintended consequences for energy intensive industries, as they will be unable to decarbonise their industry over a short timeframe. They suggested modifications to policy for energy intensive industries - suggesting that development would not be subject to the other requirements of Policy CE2 if new development results in a lower carbon intensity over the site, and to have a decarbonisation strategy in place.</p>	<p><b>Energy Intensive Industries</b></p> <p>Newham has drafted the following modification, which will be presented to the examiner for their consideration, to encourage energy intensive industries to substantially reduce their carbon intensity, while also ensuring that a decarbonisation strategy will be delivered over the long term.</p> <p>The modification proposed is:</p> <p><b>Policy CE2.6</b></p> <p><b>Development of sites occupied by existing energy intensive industries subject to the UK Emissions Trading scheme will not be subject to the other policy requirements of Policy CE2 provided that:</b></p> <ul style="list-style-type: none"> <li>- New development results in an substantially lower carbon intensity per m2 GIA/yr over the site; and</li> <li>- At the point of application, a long term decarbonisation strategy, which the Council considers to be suitably ambitious, is in place for the site; and</li> </ul> <p><b>The proposed development demonstrates consistency with the agreed decarbonisation strategy.</b></p> <p><b>CE2.6 Justification text</b></p> <p><b>Given our climate emergency commitments, the Council wishes to incentivise industries to use less fossil fuels, improve local air quality and reduce greenhouse gas emissions, as part of meeting the targets set. However, it is recognised that existing energy intensive industries subject to the UK Emissions Trading scheme will take time to decarbonise. In the interim, the Council does not wish to prevent development that will substantially reduce carbon emissions and</b></p>
--	---	---



		<p>improve air quality. This policy therefore encourages steps to substantially reduce the carbon intensity of energy intensive industries, while also ensuring that a decarbonisation strategy will be delivered over the long term.</p> <p><b>CE2.6 Implementation text</b></p> <p>This policy considers existing energy intensive industries to be those that are subject to the UK Emissions Trading scheme. Evidence of this should be submitted as part of any planning application.</p> <p>It should be demonstrated that the carbon intensity of the industrial site overall will drop substantially, and as low as possible, as a result of the new development. The Council will not support development that results in a greater use of fossil fuels overall by the industrial site. The carbon intensity of the development should be reduced in line with the latest technological ability. Where the carbon intensity of the development does not meet the levels possible by the latest technological ability, the Council will seek a one-off carbon offset payment for the difference in carbon emissions. In order for the Council to assess a development proposal, funds will be sought from the applicant for an independent energy assessor.</p> <p>The decarbonisation strategy should be suitably ambitious, considering modern and up-to-date technology, and reflect national, regional and local policies regarding decarbonisation. The plan should also demonstrate the timescales within which decarbonisation will be delivered.</p> <p>The decarbonisation strategy should be published and formally endorsed by the company's governance structure, prior to submission of the planning application. Development proposals should demonstrate consistency with the decarbonisation strategy. The Council</p>
--	--	--

		<b>will not support development if the decarbonisation strategy is not considered to be suitably ambitious, does not reflect policies regarding decarbonisation or omits timescales within which decarbonisation will be delivered.</b>
<b>CE3: Embodied Carbon and the circular economy</b>	<p><b>Justified and Deliverable</b> University College London and Silvertown Partnership supported the policy, but did note the challenge of meeting the requirements. Other developers considered that the policy was too onerous, and should only apply to schemes referable to the GLA. Silvertown Partnership and GLP considered that there was a lack of evidence to support the policy approach. Home Builders Federation stated that the policy standards exceed building regulations, and the Written Ministerial Statement of 2023 means that we cannot set our own targets and so the policy should follow building regulations. Several developers suggested changes to the policy, including aligning the policy with the London Plan or only applying the policy to schemes referable to the GLA.</p> <p><b>Data centres</b> IXDS and GLP requested that the policy exclude data centres in light of their high embodied carbon.</p> <p><b>Policy doesn't go far enough</b> PEACH: The People's Empowerment Alliance for Custom House considered that the policy didn't go far enough – targets should be lower and the circular economy should be considered in the policy.</p>	<p><b>Justified and Deliverable</b> No changes to the policy were made, as evidence base from the West of England Combined Authority and City of Westminster indicate that embodied carbon targets can be reached with little viability impact, as well as being deliverable and achievable. We maintain the policy approach of applying it to all major development, considering it necessary in light of our climate objectives. Furthermore, the policy requirements are in line with the London Plan, albeit extended to all major development rather than schemes referable to the GLA. Legal advice also sets out that the 2023 Written Ministerial Statement does not change the ability for councils to set their own standards.</p> <p><b>Data centres</b> No change to the policy approach has been made, as we consider that all buildings should minimise the levels of embodied carbon in their construction. The Council considers that no evidence was provided to explain why data centres should be excluded from the policy.</p> <p><b>Policy doesn't go far enough</b> The overall policy approach has been maintained, as we do not have evidence that lower embodied carbon targets would be achievable or justified. The Council notes that Policy CE3.2 sets out circular economy principles, including consideration of how a building is to be built; how</p>

		energy and waste can be minimised throughout the construction process; how a building could be deconstructed in future; and how a building could facilitate future modification, adaption or retrofitting work.
<b>CE4: Overheating</b>	<p><b>Building Regulations</b> Silvertown Partnership considered that overheating is covered by Building Regulations and should not therefore be included in the Local Plan.</p> <p><b>Shutters, blinds and canopies</b> One resident stated that adding external blinds, shutters or canopies to residential properties should be exempt from planning permission or universally be supported in policy – given rising temperatures.</p> <p><b>Data centres</b> GLP requested that the policy exclude data centres, given the large amount of mechanical cooling used.</p>	<p><b>Building Regulations</b> No change to the policy approach has been made. The justification text of the Policy sets out why considering overheating at the earliest stage of design is important. This is because passive design principles (building orientation, unit layout etc.) can only be considered at the earliest stage of design, and during the planning process, rather than later during the design process, when building regulation sign off occurs. Delaying these considerations risks limiting the cooling principles which could be considered making it more likely that active cooling methods are required.</p> <p><b>Shutters, blinds and canopies</b> No changes to the policy approach has been made, as we consider that the existing policy supports retrofitting homes, including consideration of overheating with the installation of external blinds, shutters or canopies.</p> <p><b>Data centres</b> No change to policy approach has been made, with buildings required to be designed to minimise the need for active cooling as much as possible. The policy is considered to be flexible enough to consider exceptional uses such as data centres.</p>
<b>CE5: Retrofit and circular economy</b>	<b>No comments were received on this policy</b>	<b>No responses required</b>
<b>CE6: Air quality</b>	<p><b>General Support</b> University College London and the Environment Agency supported the policy, noting Newham's poor air quality and efforts to improve this.</p>	<p><b>General Support</b> Support for the Local Plan approach is welcomed.</p>

	<p><b>How air quality can be improved</b> A resident noted their concern regarding air quality in the borough. Silvertown Partnership queried examples how local air quality could be improved.</p>	<p><b>How air quality can be improved</b> The implementation text of Policy CE6 and the Characterisation Study provides recommendations on how local measures can improve the dispersal of identified pollutants and reduce exposure to poor air quality. However, many sources of poor air quality – such as vehicular traffic – are outside of the remit of the Planning system.</p>
<p><b>CE7: Managing flood risk</b></p>	<p><b>Policy Flexibility and approach to set back distances</b> St William requested further policy flexibility regarding policy requirements on setback. The Environment Agency proposed some wording modifications to clarify the policy and align it with national policy.</p> <p><b>Suitability of the Strategic Flood Risk Assessment (SFRA)</b> The Environment Agency highlighted concerns regarding the robustness of the River Lee and River Roding modelling within the SFRA and the need for further modelling and review.</p>	<p><b>Policy Flexibility and approach to set back distances</b> A change to introduce further flexibility into the policy was not made as flexibility is already provided through the implementation text, which states that the buffering line is indicative only and that applicants should discuss requirements further with the Environment Agency. The current and draft policies are in keeping with national and regional policy and considered sound. The Environment Agency's proposed changes have been made and are included in the modification table: CE7.3. Developments (including redevelopment of existing buildings and sites) must be set back a minimum of 16 metres from the landward side of tidal flood defences and 8 metres from the landward side of <b>fluvial</b> river defences to future proof against increased risks of fluvial flooding, <del>taking into account</del> <b>Developers would need to take into</b> account the requirements set out in the Thames Estuary 2100 Plan <b>when proposing development within 16 metres of the landward side of tidal flood defence</b>. Where no formal defences are present, development must be set back eight metres from the top of the river bank.</p> <p><b>Suitability of the Strategic Flood Risk Assessment (SFRA)</b> This issue has now been subject to further discussion with the Environment Agency and a satisfactory resolution has been found which removes this concern. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report.</p>

	<p><b>Small technical amendments</b></p> <p>The Environment Agency were supportive of the policy but requested that some small technical amendments be made to the policy regarding finished floor levels, location of sleeping accommodation and timing of improvements.</p>	<p><b>Small technical amendments</b></p> <p>A small number of changes have been made to the policy to ensure it is fully comprehensive and directly reflects national policy. Some changes were not made, where it was considered there was already suitable references made in other parts of the policy or implementation text. The following are the changes that have been made and which are included in the modification table:</p> <ol style="list-style-type: none"> <li>1. All new development must avoid placing people or essential infrastructure at increased risk of flooding <b>for the lifetime of the development</b> through considering flood risk at the earliest design stage and, where required, by liaising with the Environment Agency, infrastructure providers and the Council (including the Lead Local Flood Authority) to deliver climate resilient development. To meet this requirement, all new development must...</li> <li>2. Developments within Flood Zones 2 (medium probability of flooding) <b>and 3 (high probability), or within the tidal breach flood extent</b>, or where detailed more up to date modelling shows it will be at increased risk of flooding due to the impacts of the climate emergency, should: <ol style="list-style-type: none"> <li>a. create space for water; and</li> <li>b. be designed and constructed to be flood <b>resistant and</b> resilient; and</li> <li>c. locate vulnerable uses above ground floor level, while still delivering active, welcoming and functional street level design; and</li> <li>d. ensure all basement locations provide internal access and egress via floors no less than 300 millimetres above the one per cent annual probability flood level and an allowance for the impact of the climate emergency, or above the 2100</li> </ol> </li> </ol>
--	---	---

		<p>tidal breach flood level where the site is within the Thames tidal breach flood extent; and</p> <ul style="list-style-type: none"> <li>e. ensure all '<b>less vulnerable</b>' 'more vulnerable', 'highly vulnerable' and 'essential infrastructure' uses have finished floor levels no less than 300 millimetres above the one per cent annual probability flood level and an allowance for the impact of the climate emergency; and</li> <li>f. provide safe access/egress, such that occupants can reach Flood Zone 1 via public rights of way or, if not possible, safe havens on higher floors.</li> </ul> <p>...</p> <p>4. Development adjacent to flood defences must confirm through liaison with the Environment Agency, that defence structures are in good condition and will provide protection for the lifetime of the development including taking into consideration the latest Climate Change Allowance modelling, and, where applicable, meet the provisions set out in the Thames Estuary 2100 Plan. If any improvements are required, these should be <b>completed prior to development made at the earliest possible stage</b> (factoring in impacts on scheme phasing and the end users of schemes) and should consider the need to design for extreme climate change scenarios.</p> <p>Implementation text:</p> <p>CE7.2</p> <ul style="list-style-type: none"> <li>• 'Water Compatible' –including flood control infrastructure, docks, marinas and wharves, navigation facilities, ship building, amenity open space, outdoor sports and recreation.</li> </ul>
--	--	---

		<p>In addition to the above vulnerability considerations, sleeping accommodation will not be permitted below the tidal breach flood level, in line with national planning policy. This is not limited to basements, and can apply to ground and higher floors, where sleeping accommodation is proposed below the breach flood level.</p> <p>CE7.3</p> <p>Flood defences covered by this policy can include underground components such as tie rods and ground anchors which may protrude into the site.</p> <p>The Thames Estuary 2100 Plan Flood defence (set-back) buffering line is indicative only and applicants are responsible for investigating the status and nature of flood defences, in consultation with the Environment Agency, <b>completed prior to development</b> <del>at the earliest stage</del>. All changes should result in improved access to existing defences.</p> <p>This process should be undertaken in liaison with the Environment Agency and the Local Authority.</p> <p>CE7.4</p> <p>...</p> <p>The safeguarding, and future proofing, of flood defences is critical to achieving climate resilient development. Proposals are expected to plan for the most extreme weather events with due consideration to the phasing of major development proposals and to implement flood defences and any identified upgrades <b>completed prior to development</b> <del>at the earliest possible stage</del>.</p>
--	--	---

<b>CE8: Sustainable drainage</b>	<b>Blue-green infrastructure runoff reduction requirements in the Royal Docks and Beckton Opportunity Area</b> Two developers objected to the requirements to the requirement for strategic sites within the Opportunity Area to implement Blue-Green Infrastructure and Sustainable Urban Drainage Systems on 50% or more of their site area and requested further flexibility be added to the policy.	<b>Blue-green infrastructure runoff reduction requirements in the Royal Docks and Beckton Opportunity Area</b> A change to introduce further flexibility into the policy has not been made, as the deliverability of the policy has been fully considered as part of the development of the Royal Docks and Beckton Riverside OAPF Integrated Water Strategy, with further site specific detail provided in part 2, section 1.6. This work was developed with the GLA, Port of London Authority, Royal Docks Management Authority, Thames Water and the Environment Agency (a technical consultee), and is considered necessary to better manage the high risk levels for surface water flooding in the area. The Council is satisfied that the plan remains sound without the proposed change.
<b>Transport</b>		
<b>T1: Strategic Transport</b>	<b>Referencing transport infrastructure</b> Transport for London requested that specific transport infrastructure be referenced in neighbourhoods and site allocations.	<b>Referencing transport infrastructure</b> The Council considers that the modifications proposed by Transport for London are too detailed. However, the Council has made modifications to Policy T1.1b to ensure that all relevant aspects of transport infrastructure are captured by the Policy. <ul style="list-style-type: none"> <li>i. Radar stations and sightline</li> <li>ii. Rail (including National Rail, Elizabeth line, Tube, DLR) lines, stations and depots</li> <li>iii. Buses – priority measures, stands (including drivers’ facilities), stations and depots/<b>garages</b></li> <li>iv. Protected mooring points, public river access points and piers</li> <li>v. <b>Bridges and tunnels</b></li> <li>vi. Safeguarded wharves and their access requirements</li> <li>vii. Rail heads and their access requirements</li> <li>viii. London City Airport (including the Public Safety Zone and Aerodrome Safeguarding requirements)</li> <li><b>ix. London Cable Car</b></li> </ul>



	<p><b>Mode share target</b> Transport for London requested that the monitoring framework be corrected with regard to the 83 per cent mode share target.</p> <p><b>Transport projects</b> London Borough of Barking and Dagenham requested that the Lower Roding Crossing is referenced in Policy T1 and on the policies map/key diagram, and that cross borough partnership is recognised in the policy.</p>	<p><b>Mode share target</b> A modification has been made to the monitoring framework to address this error.</p> <p>Target at least 83 per cent of all trips to be made by foot, cycle or public transport.</p> <p>Monitor for progress <b>towards the agreed target set in the Local Implementation Plan, following the Mayor's Transport Strategy.</b> <del>towards the Mayor's Transport Strategy target.</del></p> <p><b>Transport projects</b> The Council considers the plan should be read as a whole and specific transport projects are better referenced in the neighbourhood policies (where the Lower Roding Crossing is already referenced). The Council notes that a route has not been chosen for the Lower Roding Crossing, and therefore a route has not been mapped. However, the Council supports working with neighbouring boroughs on Transport projects and therefore a modification has been made to the justification text of Policy T1.</p> <p>The GLA, Transport for London, <del>and</del> Newham Council <b>and neighbouring boroughs</b> are working collaboratively to deliver these strategic transport improvements.</p>
<b>T2: Local Transport</b>	<p><b>Developer contributions</b> Silvertown Partnership had concerns regarding the cost of developer contributions for cycle hire and car club bays.</p>	<p><b>Developer contributions</b> No change to this policy approach has been made. Developer contributions have been viability tested. The quantity of car club parking bays sought, the quantity of funding for Legible London wayfinding sought would also depend on the scale of development. The Council considers that the policy is justified and in conformity with London Plan.</p>

	<p><b>Publicly accessible car club bays</b> Metropolitan Police Designing Out Crime requested that car club parking spaces not be located within private parking for security reasons.</p> <p><b>Low Traffic Neighbourhoods</b> A resident expressed concern regarding Low Traffic Neighbourhoods and the policy approach regarding these – with concerns regarding consultation and perceived inability to access certain parts of the borough.</p> <p><b>Local transport improvements</b> One resident requested additional wording regarding improving north-south permeability. Another resident requested additional wording regarding transport improvements in East Ham, as well as regarding accessibility in the borough.</p>	<p><b>Publicly accessible car club bays</b> No change to this policy has been made as Policy T3.1 already makes clear that car club bays should be publicly accessible.</p> <p><b>Low Traffic Neighbourhoods</b> No change to the policy approach has been made. With regards to resident concern regarding LTNs, consideration of an LTN involves extensive data collection and consideration of feedback from local residents and businesses. Traffic management may mean that residents have to take a slightly different route to get from the main road to their property. All properties remain accessible by car. Pedestrians, cyclists and wheelchair users can go through modal filters unrestricted. The rollout of LTNs in Newham has led to a significant decrease in traffic volumes, a significant increase in cycling trips, and improvements in air quality.</p> <p><b>Local transport improvements</b> No change to the policy approach has been made. The Sustainable Transport Strategy sets out interventions that will reduce severance and improve barriers to movement, with the neighbourhood policies setting out walking, cycling and public transport improvements across the borough. The Council considers that the borough is widely accessible for all residents, as set out in the Sustainable Transport Strategy. Only 4 stations in the borough are without step free access, TfL note that 95% of bus stops in London are accessible (2019 data) and the Sustainable Transport Strategy sets out further accessibility improvements to be made in future.</p>
--	--	--

	<p><b>Impact on National Highways Strategic Road Network</b></p> <p>National Highways queried if additional data was available to demonstrate that the level of housing and jobs growth in the Draft Local Plan will not impact their Strategic Road Network (i.e. the M25)</p>	<p><b>Impact on National Highways Strategic Road Network</b></p> <p>This issue has now been subject to further discussion with the National Highways. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report.</p>
<p><b>T3: Transport Behaviour Change</b></p>	<p><b>Car free development</b></p> <p>Silvertown Partnership and Transport for London supported the approach of car free development, while Ballymore and the Home Builders Federation objected to the approach, considering the policy to be restrictive and that a level of car parking should be allowed.</p> <p>Transport for London requested that the quantity of blue badge spaces should be in line with or higher than London Plan standards.</p> <p><b>Cycle parking</b></p> <p>Unite requested flexibility for cycle parking at student accommodation developments.</p>	<p><b>Car free development</b></p> <p>No change has been made. All new development will be car free, apart from limited provision for certain uses/use cases (such as industrial development with shift work and poor public transport accessibility), which must be within the maximum standards of the London Plan. We have maintained the overall policy approach in light of London Plan parking standards for inner London boroughs, Opportunity Area modal shift targets and a general policy direction to discourage private car use to support a Just Transition. The Council therefore considers the policy to be justified and in conformity with the London Plan.</p> <p>With regard to blue badge spaces, a modification has been made to the implementation text of Policy T2.1:</p> <p>Developments should provide a quantity of blue badge spaces <b>(in line with, or higher than London Plan (2021) standards)</b>, proportionate to the scale of the development and the quantity of existing blue badge spaces in the local area.</p> <p><b>Cycle parking</b></p> <p>No change has been made, as we are following the cycle parking requirements of the London Plan (2021).</p>

	<p><b>Electric Vehicle Charging Points</b> St William and Hadley did not support the policy requirement to provide contributions for Electric Vehicle Charging Points when development is car free. Ballymore did not support the requirement for 100% of parking spaces to have electric vehicle charging points</p> <p><b>Excess road space</b> CPRE expressed a desire to reduce excess road space, including expanding the amount of pedestrianised / car free areas.</p> <p><b>Transport Assessment</b> Silvertown Partnership queried the thresholds of the Transport Assessment, and Transport for London requested that the assessment include a day and night time Active Travel Zone Assessment.</p> <p><b>Cross borough Transport</b> London Borough of Barking and Dagenham requested that the policy explicitly support cross-boundary transport projects such as the Lower Roding Crossing.</p>	<p><b>Electric Vehicle Charging Points</b> No change has been made. Developments need to receive deliveries and be serviced and residents will receive visitors who use cars – in order for the plan to deliver our sustainability objectives these must be electric, which require a network of changing facilities. We wish to maximise the electrification of vehicles in light of national and regional targets. The Council considers that the policy is justified and in conformity with London Plan.</p> <p><b>Excess road space</b> No change to the policy approach has been made, as support for applications which would result in the loss of existing car parking/excess road space is maintained in the Local Plan in Policy T3.2.</p> <p><b>Transport Assessment</b> No changes have been made. The Transport Assessment thresholds are identical to the 2018 Local Plan, with transport colleagues noting that the thresholds are not seen to be disproportionate and work well. The Council already requires Transport Assessments to follow the format set out by Transport for London, which includes a day and night time Active Travel Zone Assessment.</p> <p><b>Cross borough Transport</b> A modification to the neighbourhood policy has been made to reference the Lower Roding Crossing. This sits alongside changes to Policy T1.1 which reference working with neighbouring boroughs on Transport projects.</p>
<b>T4: Servicing a Development</b>	<p><b>Last Mile Deliveries</b> SEGRO and Silvertown Partnership objected to the policy approach as they considered it would not be achievable</p>	<p><b>Last Mile Deliveries</b> No change to the policy has been made, following the evidence from the Sustainable Transport Strategy, which outlines how servicing by sustainable</p>

	<p>within their business requirements and the lack of a comprehensive zero-emission fleet.</p> <p><b>Off street deliveries and servicing</b> Transport for London requested that the policy state that servicing should take place off street wherever possible.</p>	<p>means can be delivered through the use of zero-emission vehicles or e-cargo bikes, increased numbers of parcel lockers as well as freight consolidation between businesses.</p> <p><b>Off street deliveries and servicing</b> A modification has been made to the implementation text of Policy T4.1 to reference off street servicing and deliveries.</p> <p>Where possible, servicing and deliveries should take place <b>off street</b>, within the curtilage of the development.</p>
<b>T5: Airport</b>	<p><b>Name of the Policy</b> London City Airport expressed that the name of the policy should be consistent with policy wording of other local authorities, with the full name of the Airport in the policy.</p> <p><b>Staff travel data</b> London City Airport requested that the percentage of their staff that use cars to travel to the airport should reference a particular year.</p> <p><b>National policy and masterplan</b> London City Airport stated that national policy and the airport's Masterplan were not considered or taken into consideration and that the policy should take both into account. London City Airport considers that the airport's Masterplan demonstrates how it can grow while housing is built in the area around the airport.</p>	<p><b>Name of the Policy</b> A modification has been made to the name of the policy, to include the full name of the Airport.</p> <p><del>T5: Airport</del> <b>T5: London City Airport</b></p> <p><b>Staff travel data</b> A modification has been made to the justification text of the policy with updated data and referencing a specific year.</p> <p>However, <b>53 per cent of staff in 2023 used</b> <del>nearly 60 per cent of airport staff</del> <b>still use</b> private cars to travel to the airport.</p> <p><b>National policy and masterplan</b> The airport's Masterplan does not have a statutory basis, but provides a statement of intent to be given due consideration in the planning process. No change to the policy has been made, as both the airport's Masterplan and national aviation policy were given due consideration in the development of this policy. The Council considers that the policy is justified and in conformity with London Plan.</p>

	<p><b>Mitigation of Impacts</b>  London City Airport welcomed the changes made to Local Plan following the Regulation 18 consultation with regard to consideration of development proposals at the airport. However, they maintain that they have significant concerns that policy states that certain changes to the use and function of the airport are ‘un-mitigatable’ and ‘unacceptable impacts’ to residents and future development proposals.</p> <p><b>Freight</b>  London City Airport expressed concerns regarding freight flights not being supported in policy, noting that air freight could be of benefit to Newham and east London.</p> <p><b>Car parking and improved connections</b>  London City Airport stated that policy cannot require a reduction in the level of car parking on site lower than their approved planning permission and requested that this policy requirement be removed. They also expressed desire for the policy to further support an Elizabeth line station to serve the airport.  Transport for London welcomed references to active travel and that contributions would be sought from the airport for transport improvements.</p>	<p><b>Mitigation of Impacts</b>  No change to the policy has been made. By the nature of the use of the airport, changes to the size, function, operating hours and frequency of the airport activity will cause negative impacts to local residents. Where those negative impacts would be unacceptable even following mitigation, development would not be supported. The Council has to balance various objectives in the development of the policy - and it is considered that some objectives (such as the need for housing) outweigh the case for supporting changes to the airport activity. We consider the policy to be justified and in conformity with the London Plan.</p> <p><b>Freight</b>  No change to the policy has been made, with the policy setting out that dedicated freight planes would not be supported, due to the consequential rise in goods vehicle trips that would result from these flights. The Council considers that the policy is justified and in conformity with London Plan.</p> <p><b>Car parking and improved connections</b>  No change to the policy has been made, as future development proposals could reduce the amount of car parking on site and in line with the Plan and London Plan’s approach to car parking, we would seek to support and secure this. The Sustainable Transport Strategy supports efforts by London City Airport, TfL and the Council to improve sustainable access to the airport. Discussions with both TfL and consultants working on the Sustainable Transport Strategy, concluded that an Elizabeth line station is not necessary to support the levels of growth in the Royal Docks. The Council considers that the policy is justified and in conformity with London Plan.</p>
--	---	---

	<p><b>Net Zero</b> London City Airport suggested that the policy could reference development of zero carbon technologies to allow flexibility as development of net zero aviation takes place.</p> <p><b>Royal Borough of Greenwich</b> Royal Borough of Greenwich sought that the agent of change principles would be applied to any applications that seek to alter the airport's operation which would have unacceptable impacts upon residents of the Royal Borough of Greenwich.</p> <p><b>Airport Safeguarding</b> London City Airport suggested several changes with regards to adding wording on airport safeguarding, including detailed height constraints, technical requirements, referencing bird risk and cross referencing site allocations and neighbourhood policy to the airport policy.</p>	<p><b>Net Zero</b> A modification has been made to Policy T5.3, supporting the development of zero carbon technology.</p> <p>3. Development that facilitates the <b>development or</b> use of zero carbon technologies at the airport will be supported</p> <p><b>Royal Borough of Greenwich</b> No change to the policy has been made, as the Council considers that the both Policy T5 London City Airport and Policy D6 Neighbourliness (which considers the agent of change) would be effective in assessing any application that would impact residents, including those in the Royal Borough of Greenwich.</p> <p><b>Airport Safeguarding</b> The Council considered that the level of detail proposed in the wording changes is too detailed for the Local Plan.</p> <p>However, the Council's objective for this policy approach is to ensure that applicants ensure that their developments do not impact airport safety and therefore three modifications have been made to the policy wording and implementation text of Policy T5.6.</p> <p>Development in proximity to the airport needs to consider a range of factors, including the Agent of Change principle, noise and height limitations. <b>Neighbourhoods subject to airport height constraints are the following: N1 North Woolwich, N2 Royal Victoria, N3 Royal Albert North, N4 Canning Town, N5 Custom House and N17 Gallions Reach.</b></p> <p>...</p>
--	--	--

		<p><b>Development in proximity to the airport has the potential to impact on airport safeguarding.</b> Applicants <del>that propose developments in proximity to the airport</del> should discuss the potential implications of the development with London City Airport and the Council's planning team as early as possible.</p> <p>...</p> <p>This could include noise, air quality, safety, <b>bird risk</b>, wider Agent of Change principles, and height limitations (including construction cranes).</p>
<b>Waste and Utilities</b>		
<b>W1: Waste management capacity</b>	<p><b>Waste sites on policies map</b> A developer, IXDS requested that two waste sites, identified on the policies map, were removed as they are not identified for safeguarding in the Regulation 18 Consultation Draft East London Joint Waste Plan (July 2024).</p> <p><b>Beckton Riverside</b> The London Borough of Tower Hamlets raised concerns about the implementation text for W1.3 explaining that the land at Beckton Riverside that is safeguarded for waste management in the adopted 2012 East London Waste Plan is no longer being safeguarded. They considered that releasing safeguarded waste sites is best addressed through the update of the Joint Waste Plan. St William supported that Beckton Riverside is no longer identified as a potential waste site for strategic waste management.</p>	<p><b>Waste sites on policies map</b> This modification is not considered necessary for soundness, as Policy W1 contains caveats around the list of existing waste sites being updated as the Joint Waste Plan refresh is progressed. However, the Council understands the reasons for the proposal and would support an update to site allocation and policies map, reflecting the safeguarded sites list in the draft East London Joint Waste Plan if the Inspector considers the draft Joint Waste Plan has sufficiently progressed.</p> <p><b>Beckton Riverside</b> This comment has been subject to further discussion with the London Borough of Tower Hamlets and a satisfactory resolution has been found. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report.</p>



	<p><b>Waste safeguarding requirements</b></p> <p>A developer, Ballymore argued the wording of W1.3 should be amended to 'Existing waste management sites within Newham will be safeguarded and should be retained in waste management use <b>unless allocated for strategic redevelopment</b>'. They felt this would allow for the relocation of the existing waste site on the Connaught Riverside allocation in accordance with London Plan Policy SI9.</p>	<p><b>Waste safeguarding requirements</b></p> <p>A change in this policy was not considered necessary, as the current policy would not preclude the relocation via the provision of compensatory capacity for the existing waste site on the site allocation, in line with the London Plan. This is accounted for under policy W1.4, which states that developments that would reduce or undermine the continued or enhanced use of an existing waste site will only be supported where appropriate compensatory capacity is made within London, and the site allocation, which requires the maximum throughput of the waste site to be re-provided, either within the site boundary or elsewhere within London. The Plan is considered sound without this change.</p>
<b>W2: New or improved waste sites</b>	No comments were received on this policy.	Comments received were noted.
<b>W3: Waste management in developments</b>	<p><b>Re-use and circular economy room</b></p> <p>A developer, St William supported the principle of delivering well-managed re-use and circular economy rooms, but felt provision of this requirement may be limited by whether there was sufficient space on sites to accommodate such a use. They felt the policy wording of this clause should include 'where possible or feasible'.</p> <p><b>One waste management solution or technology on site</b></p> <p>A developer, St William objected to the requirement for developments to provide only one waste management solution or technology on site. They felt there were often instances where more than one waste management solution</p>	<p><b>Re-use and circular economy room</b></p> <p>A change in this policy was not considered necessary, as we consider that there should be sufficient space available on site allocations to deliver these requirements, recognising the requirements apply to the largest sites available in the borough and would be subject to masterplanning requirements. The addition of 'where feasible' would dilute this requirement, which will be considered as part of the planning balance on individual planning applications. The Council is satisfied that the plan is sound without the proposed changes.</p> <p><b>One waste management solution or technology on site</b></p> <p>The Council's objective for this policy approach is to ensure efficient servicing of the largest site allocations in the borough. If managed inefficiently these sites could result in significantly worse air quality and poor waste management solutions for future residents. However, the Council recognises the importance of ensuring the Plan is effective and has</p>

	<p>is needed for a site, particularly large scale sites or sites that have a mix of tenures.</p> <p><b>Automated vacuum waste collection systems</b> A developer, St William objected to the requirement for an automated vacuum waste collection system on both the Twelvetreets Park and Bromley by Bow site allocation and the Beckton Riverside site allocations. They felt the requirement should be subject to a feasibility study, and may not be possible to deliver on larger masterplanned sites that comprise multiple smaller plots of land. They also raised concerns around the impact of this requirement on the viability of sites.</p>	<p>therefore made the following wording change which is included in the modification table:</p> <p>Only one type of refuse vehicle should be needed to service a site. For example, if a development proposes an underground storage of waste, this should be the only waste management solution across a development to allow for efficient servicing by a suitable collection vehicle. <b>If a development site is unable to deliver a single waste management solution on site, the Council's waste and recycling team should be contacted as early as possible to discuss whether they agree with this assessment and the most suitable alternative waste solution for the site.</b></p> <p><b>Automated vacuum waste collection systems</b> The requirement to deliver automated vacuum waste collection systems is effective and justified. The Local Plan's objective to create a healthier Newham will be, in part, facilitated through policies that seek to minimise vehicle emissions, including those that result from inefficient waste management solutions on development sites. The Council is satisfied that the plan is sound without the proposed changes.</p>
<b>W4: Utilities and Digital Connectivity Infrastructure</b>	<p><b>Utilities infrastructure capacity</b> SEGRO and the Home Builders Federation objected to the requirement for applicants to demonstrate adequate utility infrastructure capacity to meet demand.</p>	<p><b>Utilities infrastructure capacity</b> This change has not been made as the requirement is in conformity with the London Plan Policies SI5 and SI6, and the requirements outlined in the <a href="#">GLA's handbook on Coordinating utilities infrastructure through local planning</a>. It is clear that applicants are responsible for ensuring utility networks can support their development ahead of occupation and ensuring there is no impact on the existing infrastructure assets. On a strategic level, the Council has already engaged with and will continue to work with utilities providers and the GLA to address utilities infrastructure requirements in the borough</p>

	<p><b>Neighbourliness with utilities infrastructure</b></p> <p>Thames Water proposed additional wording to require adjacent developments to mitigate odour impact from the Beckton Sewage Treatment Works before completion. The Home Builders Federation objected to the requirements for developments to minimise impacts from utilities infrastructure and the Beckton Sewage Treatment Works, and requested the Council to provide guidance for appropriate mitigation.</p>	<p>and region. The Council considers the Plan sound without the proposed changes.</p> <p><b>Neighbourliness with utilities infrastructure</b></p> <p>The Council's objective for this policy approach is to ensure neighbourliness in the vicinity of existing and future utilities infrastructure. However, the Council recognised the importance of ensuring the Plan is positively prepared and effective, and of applying a comprehensive and consistent approach to agent of change considerations throughout the whole Plan, and has therefore made the following modifications.</p> <p>A modification has been made to address the timing of mitigation for the odour impact from the Beckton Sewage Treatment Works.</p> <p>The modification made is: W4.4 Implementation Text: Odour Impact Assessments will need to be submitted incorporating details of good scheme design and mitigation measures to address odour impacts from existing odorous uses in the vicinity. Mitigation which resolves potential conflicts may be necessary for development to proceed. <b>Any necessary mitigation should be completed ahead of the occupation of developments in the vicinity.</b></p> <p>Modifications have also been made to relevant Neighbourhood Policies and site allocations to address this point.</p> <p>Furthermore, modifications have been made to clarify the mitigation requirements for utilities providers and applicants ensuring they minimise the impact of utilities infrastructure in various circumstances.</p> <p>The modifications made are: W4.1:</p>
--	---	---

		<p>c. Demonstrate that the spatial, visual, amenity, environmental and transport impacts of <b>existing or permitted</b> utilities infrastructure on the proposed development will be minimised <del>and where feasible reduced, particularly where existing facilities are being expanded or reconfigured.</del></p> <p>W4.2:  <b>Projects set out in the Infrastructure Delivery Plan (IDP) will be supported in principle. All u</b>Utilities infrastructure <b>proposals</b> (including upgrades and expansion) will need to <b>meet all requirements below:</b></p> <p><b>a. A</b>align with growth requirements and support the creation of new neighbourhoods and economic opportunities.</p> <p><b>b. Utilities proposals must s</b>Support the requirements set out in the Spatial Strategy and Neighbourhood Policies in the Local Plan.</p> <p><b>c. Demonstrate that the spatial, visual, amenity, environmental and transport impacts of utilities infrastructure will be minimised.</b></p> <p><del>Projects set out in the Infrastructure Delivery Plan (IDP) will be supported in principle.</del></p> <p>W4.2 Implementation Text:  The Infrastructure Delivery Plan sets out specific infrastructure improvement and delivery requirements to support the anticipated growth in the borough over the plan period. Utilities proposals including energy, telecommunications and digital connectivity infrastructure, and water infrastructure as set out in the Infrastructure Delivery Plan will be supported subject to requirements in the Spatial Strategy and Neighbourhood Policies in the Local Plan. <b>All infrastructure proposals will be assessed against agent of change requirements under Local Plan Policy D6 and requirements in other relevant parts of the Local Plan.</b></p> <p><b>Request for additional policy coverage</b>  Thames Water requested a separate policy on water supply and wastewater infrastructure in the Plan. The Metropolitan</p>
		<p><b>Request for additional policy coverage</b>  No changes have been made in response to these comments as we consider that these considerations are already adequately addressed in relevant</p>

	<p>Police Service – Designing Out of Crime service recommended adding a reference in the policy wording for utilities work to carry out early engagement with them. AIXDS requested more explicit policy support for digital and data developments and data centre developments.</p>	<p>sections of the Plan, including Policies W4 and D1, the Inclusive Economy Policies and the Neighbourhood Policies. The Council considers the Plan sound without the proposed changes.</p>
<b>Neighbourhoods</b>		
<b>All Neighbourhoods</b>	<p><b>General support</b> This policy approach was broadly supported by Lea Valley Regional Park, Ballymore.</p> <p><b>Infrastructure requirements</b> St Williams Homes, Beckton Development Limited, Aston Mansfield and Hadley Property Group argued that there is a need for some degree of flexibility around the delivery of public realm improvements, urban greening (including street trees) and walking and cycling routes as set out in the neighbourhood policies. Stating that this is subject to technical feasibility and deliverability as to whether or not these interventions are the most suitable and viable.</p> <p><b>Tall Buildings</b> St Williams Homes, Populo and LLDC objected to the inconsistency of the maximum height parameters listed in the tall building zones for certain neighbourhoods and the number of storeys/meters reflected in existing agreements with the council or extant permissions, namely Stratford and Maryland, Three Mills, Gallions Reach and East Ham. It was also flagged that some tall building zones are too restrictive and do not reflect the neighbourhood's local context.</p>	<p><b>General Support</b> Support for the neighbourhood policies is welcomed.</p> <p><b>Infrastructure requirements</b> We did not consider this change to be necessary as these requirements have been justified by up to date evidence base, through Newham's Green and Water Infrastructure Strategy and Newham's Sustainable Transport Strategy. These Strategies have informed our policy approach to the borough's public realm improvements, urban greening (including street trees) and walking and cycling routes. Increasing public access to green and water spaces across the neighbourhoods is a key part of the neighbourhoods vision. The Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>Tall Buildings</b> We did not consider this change to be necessary as the locations and heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Whilst the Council acknowledges that previous discussions may have been held with LBN officers, and that the applicant could benefit from planning consent under the current Local Plan, those discussions are informed by the adopted Local Plan. The submission Local Plan has been informed by a more detailed townscape analysis which identifies where tall buildings may be an appropriate form of development in line with London</p>

	<p><b>Environmental Constraints</b></p> <p>The Environment Agency recommended planning conditions for any piled foundation proposals for allocated sites within SPZ1. They also put forward a list of Tidal Thames Mitigation Measures which included a list of aspirational ecological improvements, some of which are located on allocated sites.</p> <p><b>Neighbourhood character</b></p> <p>Royal Docks raised concerns regarding the Characterisation Study and how this informed the neighbourhood design principles. They are concerned that this study is heavily relied upon throughout the Local Plan, which they believe is outdated and fails to reference the consented and implemented developments.</p>	<p>Plan Policy D9. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024) and Tall Buildings Topic Paper (2025). The Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>Environmental Constraints</b></p> <p>A change to this policy approach has not been made. We did not consider this change to be necessary as the implementation text for policy CE1.2 already requires a Foundation Works Risk Assessment (FWRA) for sites where piled foundations are proposed.</p> <p>The Tidal Thames Mitigation Measures were provided to us too late to add them into the site allocations, as the list is not part of an adopted document that has been consulted upon. The Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>Neighbourhood character</b></p> <p>We did not consider this change to be necessary as the Newham Characterisation Study depicts a point in time evidence base which is sufficiently thorough to justify the policy positions in the Local Plan. This study complies with the London Plan guidance on developing such a document, and it has informed the Local Plan's spatial strategy, design policies and provides guidance on how the policies should be implemented. This study should also be read in conjunction with other evidence base documents and the viability assessment which have helped inform the requirements for each site allocation. The Council is satisfied that the plan remains sound without the proposed changes.</p>
--	---	--

	<p><b>Capacity assumptions</b></p> <p>The GLA requested that capacity assumptions should be set out for site allocations, including the minimum housing requirements and other growth over the Plan period. The GLA reference this as a requirement of LP2021 Policy D1B.</p>	<p><b>Capacity assumptions</b></p> <p>We did not consider this change to be necessary as the site allocations include design principles for how sites should be optimised for housing as well as requirements for different types of use. The capacities of the site allocations have been previously shared with the GLA and the Council are willing to share these again if needed. Upon review of LP2021 Policy D1B, there is a requirement to undertake the capacity assessments for sites but there is no requirement to publish the capacity figures. The Council is satisfied that the plan remains sound without the proposed changes.</p>
<p><b>N1: North Woolwich</b></p>	<p><b>Airport height constraints</b></p> <p>London City Airport requested that the policy states that development within the neighbourhood is subject to OLS &amp; ILS analysis.</p>	<p><b>Airport height constraints</b></p> <p>The Council's objective for this policy approach is to set out the policy framework to guide the growth of the neighbourhood and the site allocations within its boundary. The Neighbourhood policies provide the vision, design and development principles for the neighbourhood but should be read alongside the other policies in the Local Plan, which set out the standards and requirements in more detail.</p> <p>The Council considers that policy T5.6 and the guidance in Table 1: Tall Buildings adequately address engagement requirements with the London City Airport and airport constraints.</p> <p>However, the Council recognises the importance of ensuring the Plan is comprehensive and easy to read. A modification has been made to address airport height constraints in the North Woolwich neighbourhood policy.</p> <p>The modification proposed is:</p>

	<p><b>Transport improvements</b> London City Airport requested that the North Woolwich neighbourhood policy supports an Elizabeth line station at the airport.</p> <p><b>Nosie Mitigation</b> The Port of London Authority requested that the North Woolwich neighbourhood policy specifically highlighted the importance of mitigating noise impacts of the Thames Refinery Wharf.</p> <p><b>Neighbourhood vision</b> One Newham raised many questions and concerns around the vision for North Woolwich.</p> <p>Their comments included wanting to understand the work being done to improve local PTAL, interventions planned to alleviate the constrained physical landscape of the neighbourhood which limits travel routes, understand the measures in place to mitigate industrial intensification, what is being done to secure affordable retail and ensure the vitality of local centre, as well as improvements to local connectivity and low carbon opportunities.</p>	<p><b>20. requiring development within this neighbourhood to address airport height constraints and engagement in line with Policy T5.6.</b></p> <p><b>Transport improvements</b> Discussions with both Transport for London and our consultants working on our Sustainable Transport Strategy concluded that a station is not necessary to support levels of growth in the Royal Docks. The Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>Nosie Mitigation</b> A change to this policy approach has not been made. Policy D6 and supporting implementation text sets out what noise mitigation measures are needed for development of new or re-provided uses.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>Neighbourhood vision</b> The N1 North Woolwich policy has been drafted using a robust suite of evidence based documents, including the Newham Characterisation Study, the Sustainable Transport Strategy, the Employment Land Review, the Newham Climate Change Evidence Base and the Green and Water Infrastructure Strategy.</p> <p>As set out in the Local Plan, the vision for North Woolwich is to alleviate the severance created by the road and infrastructure network as well as industrial uses in the neighbourhood through new and improved networks of safe, green and accessible walking and cycling routes.</p>
--	--	---



		<p>The need to improve routes for walking and cycling is justified by up to date evidence. Newham's Sustainable Transport Strategy and Green and Water Infrastructure Strategy set out the need to provide safe, comfortable and well designed cycle and pedestrian routes and the need to provide better access to the borough's green spaces. Increasing public access and the functionality of existing green space across the neighbourhood is a key part of the N1 North Woolwich neighbourhood vision.</p> <p>The Local Plan addressed the industrial buffering requirement through design policies, Neighbourhood policy N1, and design principles in Site Allocations in North Woolwich. Applicants have to go through masterplanning in the planning application stage to ensure these requirements are met.</p> <p>The operational model of businesses, including the scope of the goods on sale and their prices, are not material planning considerations. Nevertheless, by providing a range of units, including a proportion at affordable rent, the Policies may help incentivise provision of more affordable goods and services locally.</p> <p>Policy T5 encourages zero carbon technology at London City Airport, while acknowledging that zero or low emission technology for commercial air travel is in a very early stage. Policy T5 does not prevent London City Airport from upgrading to less noisy and more polluting aircraft. The Council is satisfied that the plan remains sound without the proposed changes.</p>
--	--	---

<b>N2: Royal Victoria</b>	<p><b>Airport height constraints</b></p> <p>London City Airport requested that the Royal Victoria neighbourhood policy states that development within the neighbourhood is subject to OLS &amp; ILS analysis.</p>	<p><b>Airport height constraints</b></p> <p>The Council's objective for this policy approach is to set out the policy framework to guide the growth of the neighbourhood and the site allocations within its boundary. The Neighbourhood policies provide the vision, design and development principles for the neighbourhood but should be read alongside the other policies in the Local Plan, which set out the standards and requirements in more detail. The Council considers that policy T5.6 and the guidance in Table 1: Tall Buildings adequately address engagement requirements with the London City Airport and airport constraints.</p> <p>However, the Council recognises the importance of ensuring the Plan is comprehensive and easy to read. A modification has been made to address airport height constraints in the North Woolwich neighbourhood policy.</p> <p>The modification is:</p> <p><b>18. requiring development within this neighbourhood to address airport height constraints and engagement in line with Policy T5.6.</b></p>
<b>N2: Royal Victoria</b>	<p><b>Safeguarded wharves</b></p> <p>The Port of London Authority welcomes the reference to the safeguarded wharves that is in close proximity to the Royal Victoria neighbourhood. They do request that the supporting maps label the wharves and highlight the importance of referring to the Agent of Change principle.</p>	<p><b>Safeguarded wharves</b></p> <p>We did not consider this change to be necessary as the Plan as currently drafted does effectively identify and safeguard the Safeguarded Wharves in line with national policy and London Plan requirements. The safeguarded wharves are included on our policies map, which provides a more detailed representation of our policy requirements and designations. They are also within identified employment areas on the key diagram. Reference is already made to the safeguarded wharves in J1, with reference made to priority employment uses for these wharves. Regarding the Agent of Change principle, we did not consider this change to be necessary as requirements in line with the Agent of Change principles are already</p>

	<p><b>Data and digital economy</b> IXDS highlighted that the draft NPPF (2024) indicates that land for data centres should be identified or safeguarded through spatial designations. They request that the Royal Victoria neighbourhood safeguards the Former Paint Factory and Central Thameside West site for digital and data economy uses as was approved under planning application (23/01967/OUT).</p> <p><b>Mitigation and buffering between residential and industrial uses</b> Tate and Lyle requested specific wording changes to better manage the relationship between existing industrial uses and new residential development in the Royal Victoria neighbourhood.</p> <p><b>National Grid Assets</b> National Grid identified sites which are crossed by or are in close proximity to National Grid assets and requested the</p>	<p>provided in policy D6.2. The Council is satisfied that the plan is sound without the proposed changes.</p> <p><b>Data and digital economy</b> A change to this policy approach has not been made. We did not consider this change to be necessary as it is clear that the Local Plan should proceed based on the December 2023 NPPF following the transitional arrangements set out in the NPPF 2024. Our policy is consistent with the NPPF and in conformity with the London Plan as the delivery of data and digital growth is already addressed in Policy W4, the Inclusive Economy chapter and relevant Neighbourhood Policies. The Council is satisfied that the plan is sound without the proposed changes.</p> <p><b>Mitigation and buffering between residential and industrial uses</b> The Council recognises the importance of ensuring the Plan is clear and effective and therefore has drafted the following modification, which will be presented to the examiner for their consideration, for all neighbourhoods that have site allocations with industrial buffering:</p> <p>[Policy N2: Royal Victoria]</p> <p>The vision for Royal Victoria will be achieved by <b>4. appropriate mitigation and buffering between residential and industrial uses.</b></p> <p><b>National Grid Assets</b> A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy wording to include additional wording in relevant site allocations and Local Plan Policy W4 to</p>
--	--	--

	<p>wording regarding engagement with them during the development of these sites to be added to the Plan. For Royal Victoria they identified:</p> <p>N4.SA4 Thameside West ZR ROUTE TWR (063A - 93): 400Kv Overhead Transmission Line route: BARKING - WEST HAM 1</p>	<p>address site constraints regarding existing National Grid assets. The Council's response has not changed. Local Plan Policy W4 requires all major development to undertake engagement with utilities providers at pre-application stage to ensure their existing assets are not affected.</p> <p>However, the following wording change is made to rectify typo in the plan:</p> <p>[N2.SA4 Phasing and Implementation] The potential impact of the existing on-site sewer and existing overhead transmission <b>line route</b> on design and layout should be taken into account at the preapplication stage through early engagement with Thames Water and National Grid.</p> <p>which is included in the modification table.</p>
<b>N3: Royal Albert North</b>	<p><b>Airport height constraints</b> London City Airport requested that the Royal Albert North neighbourhood policy states that development within the neighbourhood is subject to OLS &amp; ILS analysis.</p>	<p><b>Airport height constraints</b> The Council's objective for this policy approach is to set out the policy framework to guide the growth of the neighbourhood and the site allocations within its boundary. The Neighbourhood policies provide the vision, design and development principles for the neighbourhood but should be read alongside the other policies in the Local Plan, which set out the standards and requirements in more detail. The Council considers that policy T5.6 and the guidance in Table 1: Tall Buildings adequately address engagement requirements with the London City Airport and airport constraints.</p> <p>However, the Council recognises the importance of ensuring the Plan is comprehensive and easy to read. A modification has been made to address airport height constraints in the North Woolwich neighbourhood policy.</p> <p>The modification is:</p> <p><b>19. requiring development within this neighbourhood to address airport height constraints and engagement in line with Policy T5.6.</b></p>

	<p><b>National Grid Assets</b></p> <p>National Grid identified sites which are crossed by or are in close proximity to National Grid assets and requested the wording regarding engagement with them during the development of these sites to be added to the Plan.</p> <p>For Three Mills they identified:</p> <p>N4.SA1 Royal Albert North ZR ROUTE TWR (063A - 93): 400Kv Overhead Transmission Line route: BARKING - WEST HAM 1</p>	<p><b>National Grid Assets</b></p> <p>A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy wording to include additional wording in relevant site allocations and Local Plan Policy W4 to address site constraints regarding existing National Grid assets. The Council's response has not changed. Local Plan Policy W4 requires all major development to undertake engagement with utilities providers at pre-application stage to ensure their existing assets are not affected.</p> <p>The Council is satisfied that the plan is sound without the proposed changes.</p>
<b>N4: Canning Town</b>	<p><b>Airport height constraints</b></p> <p>London City Airport requested that the Canning Town neighbourhood policy states that development within the neighbourhood is subject to OLS &amp; ILS analysis.</p>	<p><b>Airport height constraints</b></p> <p>The Council's objective for this policy approach is to set out the policy framework to guide the growth of the neighbourhood and the site allocations within its boundary. The Neighbourhood policies provide the vision, design and development principles for the neighbourhood but should be read alongside the other policies in the Local Plan, which set out the standards and requirements in more detail. The Council considers that policy T5.6 and the guidance in Table 1: Tall Buildings adequately address engagement requirements with the London City Airport and airport constraints.</p> <p>However, the Council recognises the importance of ensuring the Plan is comprehensive and easy to read. A modification has been made to address airport height constraints in the North Woolwich neighbourhood policy.</p>

	<p><b>Data and digital economy</b> IXDS highlighted that the draft NPPF (2024) indicates that land for data centres should be identified or safeguarded through spatial designations. They request that the Canning Town neighbourhood safeguards the Mayer Parry Wharf site for digital and data economy uses given the live planning application on this site (24/00088/FUL).</p> <p><b>Local Mixed Use Areas (LMUAs)</b> IXDS requested further clarity be provided to ensure that Local Mixed Use Areas (LMUAs) are clearly identified as being suitable for development comprised solely of employment uses. The reference to the Bidder Street LMUA should specify that both solely employment and employment-led mixed use developments are to be supported.</p>	<p>The modification is:</p> <p><b>13. requiring development within this neighbourhood to address airport height constraints and engagement in line with Policy T5.6.</b></p> <p><b>Data and digital economy</b> We did not consider this change to be necessary as it is clear that the Local Plan should proceed based on the December 2023 NPPF following the transitional arrangements set out in the NPPF 2024. Our policy is consistent with the NPPF and in conformity with the London Plan as the delivery of data and digital growth is already addressed in Policy W4, the Inclusive Economy chapter and relevant Neighbourhood Policies.</p> <p>The Council is satisfied that the plan is sound without the proposed changes.</p> <p><b>Local Mixed Use Areas (LMUAs)</b> It is noted that there is a need for clarification of the terminology ‘employment-led’ development. This has been rectified by making the following changes to Policy J1 and the Glossary.</p> <p>The modification is:</p> <p>[J1 Implementation Text] Employment-led development is required to first meet employment needs (including the viable operation of employment uses on the site and where relevant, adjacent sites) in any design, and then other uses such as residential can be fitted around it. <b>Employment-led development can consist of employment only development but must still demonstrate that the employment needs at the site are being met.</b></p>
--	---	--

	<p><b>National Grid Assets</b></p> <p>National Grid identified sites which are crossed by or are in close proximity to National Grid assets and requested the wording regarding engagement with them during the development of these sites to be added to the Plan. For Three Mills they identified:</p> <p>N5.SA4 Limmo ZR ROUTE TWR (063A - 93): 400Kv Overhead Transmission Line route: BARKING - WEST HAM 1</p>	<p>[Glossary]</p> <p>Employment-led development: Employment-led development requires schemes to first meet employment needs (including the viable operation of employment generating uses on the site and where relevant, adjacent sites) in any design, and then other uses such as residential to be fitted around it. <b>Employment-led development can consist of employment only development but must still demonstrate that the employment needs at the site are being met.</b></p> <p><b>National Grid Assets</b></p> <p>A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy wording to include additional wording in relevant site allocations and Local Plan Policy W4 to address site constraints regarding existing National Grid assets. The Council's response has not changed. Local Plan Policy W4 requires all major development to undertake engagement with utilities providers at pre-application stage to ensure their existing assets are not affected.</p> <p>The Council is satisfied that the plan is sound without the proposed changes.</p>
<b>N5: Custom House</b>	<p><b>Airport height constraints</b></p> <p>London City Airport requested that the Custom House neighbourhood policy states that development within the neighbourhood is subject to OLS &amp; ILS analysis.</p>	<p><b>Airport height constraints</b></p> <p>The Council's objective for this policy approach is to set out the policy framework to guide the growth of the neighbourhood and the site allocations within its boundary. The Neighbourhood policies provide the vision, design and development principles for the neighbourhood but should be read alongside the other policies in the Local Plan, which set out the standards and requirements in more detail. The Council considers that policy T5.6 and the guidance in Table 1: Tall Buildings adequately address engagement requirements with the London City Airport and airport constraints.</p>

		<p>However, the Council recognises the importance of ensuring the Plan is comprehensive and easy to read. A modification has been made to address airport height constraints in the North Woolwich neighbourhood policy.</p> <p>The modification is:</p> <p><b>15. requiring development within this neighbourhood to address airport height constraints and engagement in line with Policy T5.6.</b></p>
<b>N6: Manor House</b>	No significant comments were received.	Comments received were noted.
<b>N7: Three Mills</b>	<p><b>Approach to neighbourhood density</b> St William opposed the use of the term ‘moderate’ density in the neighbourhood policy. Arguing that Three Mills neighbourhood is a suitable location for higher densities and this should be reflected in the policy.</p> <p><b>National Grid Assets</b> National Grid identified sites which are crossed by or are in close proximity to National Grid assets and requested the wording regarding engagement with them during the development of these sites to be added to the Plan. For Three Mills they identified:</p> <p>N7.SA1 Abbey Mills 400Kv Underground Cable route: HACKNEY - WESTHAM 2 400Kv Underground Cable route: HACKNEY - WESTHAM 1</p> <p>N7.SA2 Parcellforce 400Kv Underground Cable route: CITY ROAD - WEST HAM</p>	<p><b>Approach to neighbourhood density</b> A change to the policy wording is not supported. The Council did not consider this change to be necessary as the Newham Characterisation Study (2024) sets out the borough-wide approach to intensification, which directs major regeneration to areas identified as transform areas and moderate uplift in density in conserve and enhance areas. The Council considers that the vision for the neighbourhoods supports a balanced approach to density and growth across the borough. The Council is satisfied that the plan remains sound without this change.</p> <p><b>National Grid Assets</b> A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy wording to include additional wording in relevant site allocations and Local Plan Policy W4 to address site constraints regarding existing National Grid assets. The Council’s response has not changed. Local Plan Policy W4 requires all major development to undertake engagement with utilities providers at pre-application stage to ensure their existing assets are not affected.</p> <p>The Council is satisfied that the plan remains sound without this change.</p>



	<p>400Kv Underground Cable route: PUDDING MILL LANE - WEST HAM 1</p> <p>400Kv Underground Cable route: HACKNEY - WESTHAM 2</p> <p>400Kv Underground Cable route: HACKNEY - WESTHAM 1</p>	
<b>N8: Stratford and Maryland</b>	<p><b>Transport improvements</b></p> <p>Transport for London raise concern that the infrastructure requirements listed out for the Stratford Station site does not mention development funding.</p> <p><b>Approach to neighbourhood density</b></p> <p>St William and Unite Group Plc opposed the use of the term 'moderate' density in the neighbourhood policy. Arguing that Stratford and Maryland neighbourhood is a suitable location for higher densities and this should be reflected in the policy.</p> <p><b>Protection of character of neighbourhoods and historic buildings</b></p>	<p><b>Transport improvements</b></p> <p>A change to this policy approach has not been made.</p> <p>We did not consider this change to be necessary as we consider that policy T1 and the planning obligations text which supports policy T1, read alongside BFN4 are considered sufficient hooks for the infrastructure requirements set out in the allocation.</p> <p>This is the approach taken to all obligations in the Plan and is considered sufficiently deliverable. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report.</p> <p>The Council is satisfied that the plan remains sound without this change.</p> <p><b>Approach to neighbourhood density</b></p> <p>A change to the policy wording is not supported. The Council did not consider this change to be necessary as the Newham Characterisation Study (2024) sets out the borough-wide approach to intensification, which directs major regeneration to areas identified as transform areas and moderate uplift in density in conserve and enhance areas. The Council considers that the vision for the neighbourhoods supports a balanced approach to density and growth across the borough. The Council is satisfied that the plan remains sound without this change.</p> <p><b>Protection of character of neighbourhoods and historic buildings</b></p>

	<p>Historic England strongly welcome the amendments made since Regulation 18. Comments are focussed on Stratford and Maryland neighbourhood and the implications of the tall building policy on the heritage assets.</p> <p><b>Site Allocations</b> University of East London (UEL) and LLDC requested that the Stratford and Maryland neighbourhood policy should include more allocated sites within the boundary due to its well-connected location.</p> <p><b>Neighbourhood boundary</b> University of East London (UEL) are supportive of improvements to the UEL campus, such as protecting and supporting enhancements to playing pitches, and the support for growth in training and economic opportunities for green and low carbon industries. UEL requested that they would like a boundary amendment to include the whole of UEL Stratford Campus in the N8 boundary.</p> <p><b>National Grid Assets</b></p>	<p>A change to this policy approach has not been made. The points raised by Historic England for the Stratford and Maryland neighbourhood have been subject to further discussion with Historic England. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report. Both parties agreed that a review of the St John's Conservation Area Appraisal and Management Plan will be undertaken following the adoption of the Local Plan to ensure the protection of the historic environment within Stratford and Maryland neighbourhood. The Council is satisfied that the plan remains sound without this change.</p> <p><b>Site Allocations</b> A change to this policy approach has not been made as the sites allocated have been selected following the process set out in the Site Allocation and Housing Trajectory Methodology Note. The Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>Neighbourhood boundary</b> Support is noted. A change to this policy approach has not been as an amend to the neighbourhood boundary was made in light of the comments submitted by UEL at Regulation 18. Careful consideration was taken in amending the boundary. It was concluded that the boundary could be amended as the campus is consistent with the urban grain character that is present in the Stratford and Maryland neighbourhood. A map of the Stratford Campus was not submitted as part of UEL's Regulation 18 or Regulation 19 submission so we amended the boundary to what we believed best encompassed the Stratford Campus. The Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>National Grid Assets</b></p>
--	--	---

	<p>National Grid identified sites which are crossed by or are in close proximity to National Grid assets and requested the wording regarding engagement with them during the development of these sites to be added to the Plan. For Stratford and Maryland they identified:</p> <p>N8.SA6 Stratford Waterfront South 400Kv Underground Cable route: HACKNEY - WESTHAM 2 400Kv Underground Cable route: HACKNEY - WESTHAM 1</p> <p>N8.SA7 Rick Roberts Way 400Kv Underground Cable route: HACKNEY - WESTHAM 2 400Kv Underground Cable route: HACKNEY - WESTHAM 1</p> <p>N8.SA9 Pudding Mill Electrical Substation: PUDDING MILL LANE 400KV 400Kv Underground Cable route: CITR4 - PUDM4 1 CABLE SECT 38</p> <p><b>Visitor accommodation</b> Forward trustees and local business representators do not believe that the Local Plan goes far enough to support hotel development in Stratford Centre.</p> <p><b>Purpose Built Student Accommodation (PBSA)</b></p>	<p>A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy wording to include additional wording in relevant site allocations and Local Plan Policy W4 to address site constraints regarding existing National Grid assets. The Council's response has not changed. Local Plan Policy W4 requires all major development to undertake engagement with utilities providers at pre-application stage to ensure their existing assets are not affected. The Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>Visitor accommodation</b> We did not consider this change to be necessary as visitor accommodation is a main town centre use under the NPPF, and is therefore guided by the 'town centres first principles'. The principle of support for this use is covered in the N8 Stratford and Maryland policy. The Council considers that the spatial strategy set out in the policy is consistent with the NPPF and the London Plan. The Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>Purpose Built Student Accommodation (PBSA)</b></p>
--	--	--

	<p>Unite Group Plc recommended that site allocations in the Stratford and Maryland Neighbourhood should include PBSA as a potential suitable use.</p>	<p>We did not consider this change to be necessary as the plan is effective. The site allocations only identify the priority land use needs, namely the need to deliver general needs housing as reflected in Policy H1.3. The wording of the site allocation would not preclude housing other than general needs housing or other non-priority land use needs being delivered; however, the acceptability of these types of housing on site allocations will be dependent on whether they meet the policy requirements set out in the relevant Local Plan policies and site allocation requirements. The Council is satisfied that the plan remains sound without the proposed changes.</p>
<b>N9: West Ham</b>	No comments were received.	Comments received were noted.
<b>N10: Plaistow</b>	No comments were received.	Comments received were noted.
<b>N11: Beckton</b>	<p><b>National Grid Assets</b></p> <p>National Grid identified sites which are crossed by or are in close proximity to National Grid assets and requested the wording regarding engagement with them during the development of these sites to be added to the Plan.</p> <p>For Beckton they identified:  N11.SA1 East Beckton Town Centre  ZR ROUTE TWR (063A - 93): 400Kv Overhead Transmission  Line route: BARKING - WEST HAM 1</p>	<p><b>National Grid Assets</b></p> <p>The wording change is not supported. We did not consider this change to be necessary as Local Plan Policy W4 explicitly required developments to ensure the existing utility assets are not affected by reflecting the best practice guidance published by utilities providers. However, the Council recognises the importance of ensuring the Plan is positively prepared and the need for additional wordings in the site allocation to ensure consistent approach across the plan is noted. This has been rectified by making the following wording change:</p> <p>N11.SA1 Site Profile  <b>Utilities - Overhead transmission line route</b></p> <p>Design Principle  The design and layout of the site should take account of <b>the existing overhead transmission line route and</b> risk of flooding from all sources and meet the requirements of Local Plan Policy CE7.</p> <p>Phasing and Implementation:  <b>The potential impact of the existing overhead transmission line route on design and layout should be taken into account at the pre-application stage through early engagement with National Grid.</b></p>

		which is included in the modification table.
<b>N12: East Ham South</b>	No significant comments were received.	Comments received were noted.
<b>N13: East Ham</b>	<p><b>Green Space Designation</b> St William raised concerns that the land designated as MOL and SINC do not meet the necessary tests to be designated. They argue that the previously development land should not constitute open space and does not meet the tests of MOL, and that the new SINC proposed has high levels of contamination with ‘weak-moderate’ biodiversity.</p> <p><b>Approach to neighbourhood density</b> St William sought for additional wording around the density proposed for the East Ham neighbourhood, requiring the uplift in density to be informed by a design led approach.</p> <p><b>National Grid Assets</b> National Grid identified sites which are crossed by or are in close proximity to National Grid assets and requested the wording regarding engagement with them during the development of these sites to be added to the Plan. For East Ham they identified:  N13.SA3 Former East Ham Gasworks</p>	<p><b>Green Space Designation</b> A change in policy approach is not supported. We did not consider this change to be necessary as the SINC and MOL designations are justified by up to date evidence, such as the Newham’s SINC Review (2022) and Newham’s MOL Review (2025). The Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>Approach to neighbourhood density</b> A change to the policy wording is not supported. The Council did not consider this change to be necessary as the Newham Characterisation Study (2024) sets out the borough-wide approach to intensification, which directs major regeneration to areas identified as transform areas and moderate uplift in density in conserve and enhance areas. The Council considers that the vision for the neighbourhoods supports a balanced approach to density and growth across the borough. The Council is satisfied that the plan remains sound without this change.</p> <p><b>National Grid Assets</b> A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy wording to include additional wording in relevant site allocations and Local Plan Policy W4 to address site constraints regarding existing National Grid assets. The Council’s response has not changed. Local Plan Policy W4 requires all major development to undertake engagement with utilities providers at pre-application stage to ensure their existing assets are not affected.</p>

	<p>ZBH ROUTE: 275Kv Overhead Transmission Line route: BARKING - REDBRIDGE 1</p>	<p>However, the following wording change is made to ensure consistency across the plan.</p> <p>The modification is:</p> <p>[N13.SA3 Site Profile] Utilities - Overhead transmission line <b>route</b></p> <p>[N13.SA3 Design Principles] The design and layout of the site should take into consideration the electricity pylons on the eastern boundary of the site <b>and the existing overhead transmission line route</b>, and minimise the impact of noise from any required Pressure Reduction System on residential amenity.</p>
<p><b>N14: Green Street</b></p>	<p><b>Queen's market</b> Friends of Queen's Market, Residents, Network Rail and London Continental Railway acknowledge the removal of the site allocation with mixed views. Concerns were raised about the impact of its removal on delivering affordable homes, while others welcomed its removal they raised concerns on the Green Street Neighbourhood policy about protecting Queen's Market and recognising the functionality of the market. To help recognise the market in policy and to protect the market from development, they would like to see wording around its affordable nature and a prescriptive description of Queens Market be provided. They highlighted the need for the description of the appearance of the market to be updated especially around the list of improvements intended for the market.</p> <p><b>Transport improvements</b> Transport for London raise that the provision of step-free access at Upton Park station would need to be wholly</p>	<p><b>Queen's market</b> The Local Plan is unable to detail the list of operational arrangements for the markets as these are not material planning considerations. Policy HS4 seeks to protect the principle of the market.</p> <p>However, a modification has been proposed to remove reference to the toilets as a requirement for improvement to the market to recognise that the Good Growth funding has already delivered improvements to the toilets block.</p> <p>The modification is:</p> <p>[Policy N14.4] 4. protecting and enhancing the role of Queen's Market by: a. requiring improvements to the public realm, <del>toilets</del> and market facilities;</p> <p><b>Transport improvements</b></p>

	<p>funded through developer contributions or other funding sources as they are unable to commit to funding.</p>	<p>A change to this policy approach has not been made. The Council are not prioritising step-free access over other infrastructure requirements, as set out in Policy BFN4.</p> <p>BFN4 sits alongside policy T1 and the planning obligations text which supports policy T1, which are considered sufficient hooks for the infrastructure requirements set out in the neighbourhood policy. This is the approach taken to all obligations in the Plan and is considered sufficiently deliverable. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report. The Council is satisfied that the plan remains sound without this change.</p>
<b>N15: Forest Gate</b>	<p><b>Transport improvements</b></p> <p>Transport for London raise that the provision of step-free access at Wanstead Park station would need to be wholly funded through developer contributions or other funding sources as they are unable to commit to funding.</p>	<p><b>Transport improvements</b></p> <p>A change to this policy approach has not been made. The Council are not prioritising step-free access over other infrastructure requirements, as set out in Policy BFN4.</p> <p>BFN4 sits alongside policy T1 and the planning obligations text which supports policy T1, which are considered sufficient hooks for the infrastructure requirements set out in the neighbourhood policy. This is the approach taken to all obligations in the Plan and is considered sufficiently deliverable. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report. The Council is satisfied that the plan remains sound without this change.</p>
<b>N16: Manor Park and Little Ilford</b>	<p><b>Transport improvements</b></p> <p>Transport for London raise that the provision of step-free access at Woodgrange Park station would need to be wholly funded through developer contributions or other funding sources as they are unable to commit to funding.</p>	<p><b>Transport improvements</b></p> <p>A change to this policy approach has not been made. The Council are not prioritising step-free access over other infrastructure requirements, as set out in Policy BFN4. BFN4 sits alongside policy T1 and the planning obligations text which supports policy T1, which are considered sufficient hooks for the infrastructure requirements set out in the neighbourhood policy. This is the approach taken to all obligations in the Plan and is considered sufficiently deliverable. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate</p>

		Report. The Council is satisfied that the plan remains sound without this change.
<b>N17: Gallions Reach</b>	<p><b>Provision of new SINC</b> St William raised concerns over land in Gallions Reach being designated as a new SINC due to the implications that this designation would have on the development potential for the neighbourhood.</p> <p><b>Transformative transport measures</b> St William argued the Gallions Reach neighbourhood policy is too dependent on the DLR extension and instead should refer to other types of transformative transport measures in line with the site allocation wording.</p>	<p><b>Provision of new SINC</b> A change in policy approach is not supported. We did not consider this change to be necessary as the SINC designation is justified by up to date evidence, in the Newham's SINC Review (2022). The Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>Transformative transport measures</b> The comment provided has not resulted in a change. We did not consider this change to be necessary as LB Newham and TfL consider that there is more certainty regarding the DLR extension following submission of the business case by TfL. The Council is satisfied that the plan remains sound without the proposed changes.</p> <p>However, this policy approach also received comments regarding certainty of the DLR extension following submission of the business case by TfL.</p> <p>Newham has therefore drafted the following modification, which will be presented to the examiner for their consideration, to remove reference to similarly transformative public transport interventions when referencing the DLR extension and station. As previously mentioned, this is due to the Council and TfL having more certainty regarding the DLR extension following the submission of its business case as set out in the SoCG.</p> <p>[N17 Gallions Reach Vision] Gallions Reach will be transformed into a new neighbourhood through the delivery of an extended DLR line and new DLR station <del>or a similarly transformative (as confirmed by Transport for London) public transport intervention</del> at N17.SA1 Beckton Riverside. The new neighbourhood will include a large number of homes, new and intensified employment uses and</p>



	<p>the creation of a new town centre and a new neighbourhood parade. The neighbourhood's riverside location will be optimised, through improved access and landscaping along both the River Thames and the River Roding. The neighbourhood will benefit from new green spaces and improved access to existing green spaces and nature. New development will benefit from new and improved public transport connections and a network of safe, green and accessible walking and cycling routes leading to destinations across the neighbourhood and to the wider network of neighbourhoods.</p> <p>To align with the delivery of a new DLR station <del>or a similarly transformative (as confirmed by Transport for London) public transport intervention</del>, a new town centre will be created. This will consolidate and diversify the existing retail offer alongside the creation of a local scale evening and night time economy. The neighbourhood will be supported by new community facilities and schools.</p> <p>[Policy N17 Gallions Reach] The vision for Gallions Reach will be achieved through the extension of the DLR and the creation of a new DLR station <del>or a similarly transformative (as confirmed by Transport for London) public transport intervention</del>, along with improved capacity at Gallions Reach station, to enable an uplift in housing density and the creation of a new town centre and by:</p>
<p><b>Provision of community facilities</b> St Williams requested further clarity around the provision of community facilities and that text should be included that outlines that the requirement for a health centre, leisure, faith and education facilities are subject to a needs based assessment.</p>	<p><b>Provision of community facilities</b> The comment you have provided has not resulted in a change. We did not consider this change to be necessary as the Local Plan is applied in the round.</p> <p>Policy SI2 sets out that a sufficient supply of community facilities and health facilities will be achieved through the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery.</p>

		<p>Policy SI3 sets out that sufficient supply of sport and recreation facilities will be achieved through the delivery of new or re-provided sport or recreation facilities on identified site allocations, subject to a needs based assessment at the time of delivery.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes. However, modifications have been made for consistency and to ensure clarity when referring to the provision of new community facilities, including education and health provision.</p> <p>The modifications are:</p> <p>[Policy N17 Gallions Reach]</p> <p>18. supporting new community facilities when in conformity with Local Plan <del>Policies Policy SI2 and SI3</del>, including a leisure centre and faith facilities <b>at N17.SA1 Beckton Riverside;</b></p> <p>20. providing education provision in the form of a secondary school and primary school in close proximity to Atlantis Avenue and Armada Way <b>at N17.SA1 Beckton Riverside;</b></p> <p>In addition the following modification to the infrastructure requirements for site allocation N17.SA1 Beckton Riverside:</p> <ul style="list-style-type: none"> <li>• A secondary school of the scale required to meet projected need for school places <b>in accordance with Local Plan Policy SI4</b> . Open space for the secondary school can be split between the core school site requirements and hard outdoor PE provision, which should be provided on the school site, and soft outdoor PE provision which can be met in another part of the allocation but within a 10 minute walk of the school. Both the hard and soft outdoor PE provision should be accessible to the wider community; and</li> </ul> <p>21. requiring a new health centre <del>to provide a wide range of health services at</del> <b>N17.SA1 Beckton Riverside</b></p>
--	--	--

	<p><b>Airport height constraints</b> London City Airport requested that the Gallions Reach neighbourhood policy states that development within the neighbourhood is subject to OLS &amp; ILS analysis.</p> <p><b>Approach to neighbourhood density</b> St William request specific reference to ‘significant’ uplift in housing density in the Gallions Reach neighbourhood. Arguing that the neighbourhood is a suitable location for higher densities and this should be reflected in the policy.</p>	<p><b>Airport height constraints</b> The Council’s objective for this policy approach is to set out the policy framework to guide the growth of the neighbourhood and the site allocations within its boundary. The Neighbourhood policies provide the vision, design and development principles for the neighbourhood but should be read alongside the other policies in the Local Plan, which set out the standards and requirements in more detail. The Council considers that policy T5.6 and the guidance in Table 1: Tall Buildings adequately address engagement requirements with the London City Airport and airport constraints.</p> <p>However, the Council recognises the importance of ensuring the Plan is comprehensive and easy to read. A modification has been made to address airport height constraints in the North Woolwich neighbourhood policy.</p> <p>The modification is:</p> <p><b>22. requiring development within this neighbourhood to address airport height constraints and engagement in line with Policy T5.6.</b></p> <p><b>Approach to neighbourhood density</b> A change to the policy wording is not supported. The Council did not consider this change to be necessary as the Newham Characterisation Study (2024) sets out the borough-wide approach to intensification, which directs major regeneration to areas identified as transform areas and moderate uplift in density in conserve and enhance areas. The Council considers optimising site density through a design-led approach is set out in Policies BFN1, D3 and H1. Neighbourhood policy N17 also supports the creation of a new neighbourhood character in Gallions Reach through the phased</p>
--	---	---

	<p><b>National Grid Assets</b> National Grid identified sites which are crossed by or are in close proximity to National Grid assets and requested the wording regarding engagement with them during the development of these sites to be added to the Plan.</p> <p>N1.SA1 Beckton Riverside ZR ROUTE TWR (063A - 93): 400Kv Overhead Transmission Line route: BARKING - WEST HAM 1</p> <p><b>Lower Roding Crossing</b> London Borough of Barking and Dagenham raised it may be beneficial to explicitly reference the Lower Roding Crossing as it proposes benefits to Gallions Reach neighbourhood. Transport for London recommended to include the crossing on the proposals map for consistency with the Infrastructure Delivery Plan.</p>	<p>transformation of N17.SA1 Beckton Riverside. The Council is satisfied that the plan remains sound without this change.</p> <p><b>National Grid Assets</b> A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy wording to include additional wording in relevant site allocations and Local Plan Policy W4 to address site constraints regarding existing National Grid assets. The Council's response has not changed. Local Plan Policy W4 requires all major development to undertake engagement with utilities providers at pre-application stage to ensure their existing assets are not affected. The Council is satisfied that the plan remains sound without this change.</p> <p><b>Lower Roding Crossing</b> A modification has been made to the Local Plan to mention support of the Lower Roding Crossing, however the Council considers that it is premature to include the crossing on the proposals map, given that the proposal is at an early stage of development and no specific route has been chosen.</p> <p>The modification is:</p> <p>[Policy N17 part 11.e] providing new crossings at Royal Docks Road, Gallions Reach Roundabout, Alfred's Way and across the River Roding (<b>including the Lower Roding Crossing</b>) to reduce severance, and to improve connectivity to Beckton, the wider network of neighbourhoods and <b>to neighbouring boroughs</b>;</p>
<b>Sites</b>		
<b>All Sites</b>	<b>Site Allocation Maps</b>	<p><b>Site Allocation Maps</b> We did not consider this change to be necessary as the Site Allocation maps have been positively prepared. The development principles for each</p>

<p>Landowners and developers objected to the level of detail on the site allocation maps, particularly the location of open space and key routes. Some argued that the maps did not reflect pre-application discussions or extant permissions.</p> <p><b>Tall Buildings</b> Landowners and developers objected to inconsistencies between the maximum height parameters listed in the design principles for certain site allocations and the number of storeys/meters reflected in existing agreements with the council or extant permissions.</p> <p><b>Objection to development principles</b> Landowners and developers objected to inconsistencies between the development principles for certain site allocations and the details which have been already agreed upon with the council or permitted under extant permissions. Some raised concerns regarding the discrepancies between the land uses that had been agreed on site and those proposed in the site allocations, others objected to the amount of open space requested to be brought forward on site and some questioned the</p>	<p>allocation set out the requirements that need to be met on site and the site allocation map provides an illustrative representation of how this could be delivered. The Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>Tall Buildings</b> We did not consider this change to be necessary as the locations and heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Whilst the Council acknowledges that previous discussions may have been held with LBN officers, and that the applicant could benefit from planning consent under the current Local Plan, those discussions are informed by the adopted Local Plan. The submission Local Plan has been informed by a more detailed townscape analysis. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024) and Tall Buildings Topic Paper (2025). The Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>Objection to development principles</b> We did not consider a change to be necessary as the methodology for how we formulated the site allocations is fully set out in the Site Allocation and Housing Trajectory Methodology Note, which forms part of the Plan's evidence base. Whilst the Council acknowledges that previous discussions may have been held with LBN officers, and that the applicant could benefit from planning consent under the current Local Plan, those discussions are informed by the adopted Local Plan. The submission Local Plan has been informed by a more detailed and up to date evidence. Going forward the Local Plan is gaining weight in decision making and information regarding the new site allocations has been fed into the pre-application process. The</p>
--	---

	<p>infrastructure requirements set out, stating these requirements are different to those agreed in vision documents and pre-application discussions with the Council.</p> <p><b>Objection to social infrastructure requirements</b> Some landowners and developers objected to the social infrastructure requirements on their sites. This included health facilities, specifically the size of health centre required, and leisure and sport uses requirements.</p> <p><b>Objection to green infrastructure requirements</b> Some landowners and developers objected to the open space requirements on their sites, both in terms of quantity and locations, on the grounds of viability.</p> <p><b>Objection to employment use requirements</b> Some landowners and developers requested more flexibility in the delivery of employment uses on site and raised objections to other employment use requirements, including prioritising certain types of employment uses and the amount of floorspace.</p>	<p>Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>Objection to social infrastructure requirements</b> We did not consider this change to be necessary as the methodology for how we formulated the site allocations, their land use and infrastructure requirements is fully justified as set out in the Site Allocation and Housing Trajectory Methodology Note, which forms part of the plan's evidence base. The infrastructure requirements were informed by the Built Leisure Needs Assessment, Community Facilities Needs Assessment, Playing Pitch Strategy and discussions with key stakeholders such as the NHS to establish their requirements. The Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>Objection to green infrastructure requirements</b> We did not consider this change to be necessary as the amount and type of green infrastructure required on site allocations has been informed by Newham's Green and Water Infrastructure Study. The Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>Objection to employment uses requirements</b> We did not consider these changes to be necessary as the requirement for delivering employment floorspace at site allocations is to reprovide existing businesses and to address the employment capacity needs in the borough as evidenced in the Employment Land Review (2022). Policy J3 provides flexibility to relocate existing businesses for more efficient use of land.</p> <p>The development principles of the site allocations outline the priority employment uses needs as informed by the Employment Land Review (2022). Policy J1 provides flexibility for developments at site allocations to</p>
--	---	--

	<p>deliver employment uses outside the priority uses but have to be justified by location and market demand evidence.</p> <p>For sites with the requirement to deliver same quantity of industrial floorspace as the permitted schemes, it is considered necessary to include this requirement to maintain the permitted level of industrial floorspace on site to meet the borough's need. The Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>Water and wastewater infrastructure</b> Local Plan Policy W4 and the phasing and implementation section of relevant site allocations requires developments to take account of the likely requirement for water and wastewater infrastructure upgrades through early engagement with Thames Water. However, the Council recognises the importance of ensuring the site allocations reflects the latest utility capacity condition and has therefore made modifications to update the wording in phasing and implementation section of relevant site allocations.</p> <p><b>Town Centre Uses</b> Policy HS1 intends to provide further flexibility in meeting needs in areas not within 400m radius of an existing or planned town or local centre or neighbourhood parade, by allowing for the masterplanned delivery of small scale frontages serving localised need. The Council recognises the importance of ensuring the Plan is clear in its intended application, and has therefore made the following wording change to policy HS1.1 and its respective implementation text, which are included in the modifications table.</p> <p>HS1.1. [...]The network will be managed and supported to service the needs of residents, workers and visitors, and includes:</p>	<p><b>Water and Wastewater Infrastructure</b> Thames Water provided comments on all site allocations in regard to water and waste water infrastructure, highlighting whether the scale of development is likely to require upgrades to the water supply and waste water networks. The change in position for some sites is due to further assessment with the submission of third party planning applications and specific drainage strategies.</p> <p><b>Town Centre Uses</b> Some landowners and developers felt the approach in the allocations to town centre uses was too restrictive and could benefit from greater flexibility.</p>
--	--	--

	<p><b>Transport constraints</b></p> <p>TfL requested additional wording in the infrastructure requirements for certain site allocations to take account of potential transport constraints, such as below ground assets (not limited to) the London Underground, Silvertown Tunnel and DLR, and the Cable Car airspace through early engagement with Transport for London Infrastructure Protection.</p>	<p>[...] f. The creation of <del>new small scale frontages serving localised need</del> including new Neighbourhood Parades at N17.SA1 Beckton Riverside, N2.SA2 Lyle Park West and N8.SA3 Greater Carpenters District; <b>and g. The creation of new small scale frontages serving localised need in areas not within 400m radius of an existing or planned town or local centre or neighbourhood parade.</b></p> <p><b>Transport constraints.</b></p> <p>A change to this policy approach has not been made. We did not consider this change to be necessary as the infrastructure requirements are justified and the Local Plan addresses the issues raised in the implementation text T1.1. The Council is satisfied that the plan remains sound without the proposed changes.</p>
<b>New Sites</b>	<p><b>New Sites</b></p> <p>A number of sites were submitted for allocation by landowners. These sites were located in the Stratford and Maryland, West Ham and East Ham Neighbourhoods.</p>	<p><b>New Sites</b></p> <p>We did not consider this change to be necessary as largely most of the sites were previously submitted and were assessed in line with the methodology set out in the Site Allocation and Housing Trajectory Methodology Note. These sites were not allocated as they did not meet the criteria for allocation set out in the Site Allocation and Housing Trajectory Methodology. For those sites submitted at Regulation 19, this was considered too late to add additional sites to the Plan, especially as deliverability of these sites were not clear. The Council is satisfied that the plan remains sound without the proposed changes.</p>
<b>N1.SA1: North Woolwich Gateway</b>	<p><b>Transport Improvements</b></p> <p>Transport for London raise the need for the North Woolwich Gateway (N1.SA1) site allocation to explicitly state that the bus standing should be retained due to the discussions about the future use of bus stand and stop space.</p>	<p><b>Transport Improvements</b></p> <p>The Council notes that Local Plan Policy T1 makes specific reference to bus stands, however the bus stands at N1.SA1 are within the red line boundary of the site.</p>



		<p>The Council recognises the importance of ensuring the Plan is clear and effective and therefore has drafted the following modification, which will be presented to the examiner for their consideration:</p> <p>Development should address open space deficiencies by providing a pocket park. The open space provision should prioritise community growing opportunities. In addition to the open space provision, development should provide publicly accessible play space in form of a Local Equipped Area for Play and Local Area for Play. These should be playable public realm.</p> <p><b>Provision of bus stops and bus stands (including drivers' facilities) on Pier Road must be maintained.</b></p>
<b>N2.SA2: Lyle Park West</b>	<p><b>Industrial buffering</b> Tate and Lyle requested specific wording changes to better manage the relationship between existing industrial uses and new residential development, particularly in relation to the location and height of buffer buildings.</p> <p><b>Tall Building Zone (TBZ) 11</b> L&amp;Q flagged concern of the lower height parameter for the site allocation compared to what was set out at Regulation 18. This raised some concerns around the application of the Tall Building Zone(TBZ)11 for which Lyle Park West sits in and questioned the justification of the TBZ. These concerns were also echoed by Hagley Ltd.</p>	<p><b>Industrial buffering</b> A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan includes requirements to manage the buffer between industrial and residential development in the design policies, Neighbourhood N2 policy and Site Allocation N2.SA2. Buffer to SIL including the Northern edge will be achieved through masterplanning and applicant has to follow the requirements in design principles and key diagram for open space opportunity and other design mitigation to the sensitive edge under Site Allocation N2.SA2. The Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>Tall Building Zone (TBZ) 11</b> We did not consider a change to this policy approach to be necessary as despite TBZ11 being identified as a low sensitive to change area in the Characterisation Study, due to the agent of change principle and based on the townscape work undertaken to support the submission Local Plan, as directed by the London Plan (2021), it was concluded that the TBZ11: Lyle Park West cannot support greater heights as it would cause challenges for the delivery of Policy J1 on the adjacent SIL. More details on the</p>

	<p><b>Protecting existing employment uses</b> The GLA requested the prioritisation of Class B use at Lyle Park West.</p>	<p>methodology could be found in the Tall Building Annex (2024). The Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>Protecting existing employment uses</b> Existing industrial capacity at the site is protected by Policy J3 which requires site allocations to reprovide employment floorspace for existing businesses or submit a Relocation Strategy demonstrating reasonable endeavours to relocate existing businesses. The Council's objective for this policy approach is to ensure existing industrial capacity within Class E at the site is to be protected with like-to-like floorspace. However, the Council recognises the importance of ensuring the Plan is positively prepared, justified and effective, and has therefore made modifications in Policies J2 and J3, and the Monitoring Framework to address the comment related to use class.</p>
<p><b>N2.SA3: Connaught Riverside</b></p>	<p><b>Additional wording to support large-scale purpose-built shared living</b> Ballymore requested that the site allocation include wording to support the delivery of large-scale purpose-built shared living on Connaught Riverside site allocation.</p> <p><b>Protecting existing employment uses</b> The GLA requested the prioritisation of Class B use at Connaught Riverside.</p>	<p><b>Additional wording to support large-scale purpose-built shared living</b> A change to this policy approach has not been made. We did not consider this change to be necessary as the site allocations only identify the priority land use needs, namely the need to deliver general needs housing as reflected in Policy H1.3. The wording of the site allocation would not preclude housing other than general needs housing being delivered; however, the acceptability of these types of housing on site allocations will be dependent on whether they meet the policy requirements set out in the relevant Local Plan policies. The Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>Protecting existing employment uses</b> Existing industrial capacity at the site is protected by Policy J3 which requires site allocations to reprovide employment floorspace for existing businesses or submit a Relocation Strategy demonstrating reasonable endeavours to relocate existing businesses. The Council's objective for this policy approach</p>

	<p><b>Industrial buffering</b></p> <p>Tate and Lyle requested specific wording changes to better manage the relationship between existing industrial uses and new residential development, particularly in relation to the location and height of buffer buildings.</p>	<p>is to ensure existing industrial capacity within Class E at the site is to be protected with like-to-like floorspace. However, the Council recognises the importance of ensuring the Plan is positively prepared, justified and effective, and has therefore made modifications in Policies J2 and J3, and the Monitoring Framework to address the comment related to use class.</p> <p><b>Industrial buffering</b></p> <p>A change to this policy approach has not been made. As with site allocation N2. SA2 Lyle Park West, we did not consider this change to be necessary as the Local Plan includes requirements to manage the buffer between industrial and residential development in Design policy, Neighbourhood N2 policy and Site Allocation N2.SA3. Buffering to the SIL will be achieved through masterplanning and the applicant is to follow the requirements in the design principles and key diagram in relation to open space opportunity and other design mitigation to the sensitive edge under Site Allocation N2.SA3. The Council is satisfied that the plan remains sound without the proposed changes.</p>
<b>N3.SA1: Royal Albert North</b>	<p><b>Royal Albert North boundary</b></p> <p>ExCel and Mount Anvil requested that the site allocation boundary be amended to exclude an area within their ownership, which is not intended to come forwards for comprehensive redevelopment.</p> <p><b>Education uses</b></p> <p>RAD CHP requested additional wording be added to the allocation to acknowledge the incoming new campus at RAD, as per their live masterplan.</p>	<p><b>Royal Albert North boundary</b></p> <p>This change has not been made as the wider boundary is considered necessary to ensure a comprehensive masterplan of the realignment of Royal Albert Way and northern Connaught roundabout. The Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>Education uses</b></p> <p>A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan's site allocations do not reference masterplans which are yet to be implemented or permitted.</p> <p>Furthermore, the Local Plan is applied in the round, with policy SI4 setting out policy requirements for new education facilities where these are</p>

		proposed. The Council is satisfied that the plan remains sound without the proposed changes.
<b>N4.SA2: Silvertown Way East</b>	<p><b>Protecting existing employment uses</b></p> <p>The GLA requested existing industrial capacity on non-designated employment sites at Silvertown Way East should be retained.</p>	<p><b>Protecting existing employment uses</b></p> <p>Existing industrial capacity at the site is protected by Policy J3 which requires site allocations to reprovide employment floorspace for existing businesses or submit a Relocation Strategy demonstrating reasonable endeavours to relocate existing businesses. The Council considers the Plan sound without the proposed changes.</p>
<b>N4.SA3: Canning Town Holiday Inn</b>	<p><b>Objection to employment use requirements</b></p> <p>Redefine Hotels Portfolio IV Ltd raised objections to the suitability of the site in delivering B class industrial.</p> <p><b>Protecting existing employment uses</b></p> <p>The GLA requested existing industrial capacity on non-designated employment sites at Canning Town Holiday Inn should be retained.</p>	<p><b>Objection to employment use requirements</b></p> <p>We did not consider this change to be necessary as the site allocation is positively prepared and justified. The requirement for employment floorspace would reprovide existing capacity at the site. Lighter industrial uses within B use class such as storage or distribution is considered suitable for co-location with residential development through careful masterplanning as evidenced in Newham Characterisation Study 2024. The Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>Protecting existing employment uses</b></p> <p>Existing industrial capacity at the site is protected by Policy J3 which requires site allocations to reprovide employment floorspace for existing businesses or submit a Relocation Strategy demonstrating reasonable endeavours to relocate existing businesses. The Council considers the Plan sound without the proposed changes.</p>

<p><b>N4.SA5: Canning Town Riverside</b></p>	<p><b>Bridge landing points</b> IXDS requested the removal of the requirement to safeguard the bridge landing point on site allocation Canning Town Riverside until further feasibility studies had been undertaken.</p> <p><b>Waste site re-provision</b> IXDS requested the removal of waste sites from the policies map on site allocation Canning Town Riverside, noting they have not been identified as safeguarded waste sites in the Regulation 18 Consultation Draft East London Joint Waste Plan (July 2024). The GLA emphasised the requirements of London Plan policy SI 9 in decision making.</p> <p><b>River Wall works</b> IXDS objected to requirement for a new river wall at Canning Town Riverside, reflecting the Environment Agency’s latest advice on planning applications for the site.</p>	<p><b>Bridge landing points</b> The requirement to safeguard the bridge landing point on SA4.5 has been retained. We did not consider this change to be necessary as we consider that there is strong evidence for a bridge in this area, as part of the Lower Lea Valley priority bridges programme. The Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>Waste site re-provision</b> Policy W1 contains caveats around the list of existing waste sites being updated as the Joint Waste Plan refresh is progressed. However, the Council understands this modification could improve the clarity of policy W1 and the site allocations. If the Inspector considers the draft Joint Waste Plan has sufficiently progressed to update the site allocation and policies map, the Council would be supportive of updating the list of safeguarded waste sites, reflecting the latest draft of the East London Joint Waste Plan. With regards to the GLA’s comments, the site allocation requirements will be considered alongside the requirements of the London Plan in decision making. The Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>River Wall works</b> The Council recognises the importance of ensuring the Plan is effective and receptive to the latest advice of the Environment agency and has therefore made the following wording change, which is included in the modification table:  The site requires an <b>upgrade to the new</b> river wall.</p>
--	---	---

<b>N7.SA1: Abbey Mills</b>	<p><b>Transport improvements</b></p> <p>TfL and Network Rail requested additional wording in the Abbey mills site allocation to reserve some land to the north west of West Ham station to ensure that potential future options for increased capacity at West Ham station can be accommodated.</p> <p><b>Green space provision</b></p> <p>CPRE requested that Abbey Mills is not allocated for housing as the site includes Metropolitan Open Land which they believe should be set aside for a large green open space or habitat.</p> <p><b>Inadequate community facility provision</b></p> <p>Residents and the landowner objected to the Abbey Mills site allocation arguing that the community facility proposed</p>	<p><b>Transport improvements</b></p> <p>The Council supports improvement in access and capacity at West Ham station, as set out in the Sustainable Transport Strategy. At present, there is not sufficient published evidence on what improvements would be required at West Ham, and the land required for any improvements.</p> <p>However, the Council recognises the importance of ensuring that the Plan is effective, and therefore has drafted the following modification, which will be presented to the examiner for their consideration:</p> <p>Development should contribute to active and public transport upgrades, including access to and capacity at West Ham and/or Abbey Road Stations.</p> <p><b>The applicant should engage with TfL at the point of application to see if land is required to enable station upgrades at West Ham station.</b></p> <p><b>Green space provision</b></p> <p>We did not consider a change to be necessary as Newham's Green and Water Infrastructure Study has identified a need for the site allocation, N7.SA1 Abbey Mills, to address green space deficiency by enhancing existing trees as a buffer to rail infrastructure and providing a consolidated local park with a minimum area of 2 hectares to service nearby residential neighbourhoods. This reflected in the infrastructure requirements for this site. The Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>Inadequate community facility provision</b></p> <p>We did not consider this change to be necessary as the Local Plan is applied in the round. The development principles section of the site allocation</p>
----------------------------	---	--

	<p>is inadequate to the meet the needs of the diverse community.</p>	<p>directs the reader to Local Plan Policies SI1, SI2 and SI3 for the delivery of social infrastructure.</p> <p>Policy SI1 of the Local Plan seeks to protect existing facilities unless it can be demonstrated they are no longer needed. Therefore, a key development principle of the site allocation is to replace the existing temporary community use with the equivalent amount of community floor space.</p> <p>Local Plan Policy SI2 directs larger new and re-provided community facilities to town and local centre locations. To reflect this, the design principles for N7.SA1 state that community facilities should be located to the south east of the site in proximity to West Ham Station and as part of Twelvetrees Local Centre. Policy SI2 sets out that new, expanded and improved community facilities can be delivered, where it meets an unmet demand which will not be met by any planned delivery. Therefore, a re-provided faith facility could be provided at a larger scale on site allocation N7.SA1, provided it met the criteria set out in Policy SI2.</p> <p>Clause 7 of Policy SI2 are relevant when considering the suitability of a community facility on this site in its ability to meet the needs of women and children of Muslim faith. It requires new, expanded and improved community facilities to:</p> <ul style="list-style-type: none"> <li>• demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space</li> <li>• ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and</li> <li>• be inclusive and accessible.</li> </ul> <p>Clause 7.a of Policy SI2 requires any re-provided community facility to provide a Social Value-Health Impact Assessment (SV-HIA, see also Policy BFN3). This is to ensure that that new and re-provided community facilities</p>
--	--	--

	<p><b>Proposed key route</b></p> <p>Residents and the landowner objected to the proposed key route as demonstrate don't he site allocation map, arguing that the location of this route negatively impacts the development potential for the site.</p> <p><b>Lack of community engagement</b></p> <p>Residents argued that the Council had not engaged with the community or Landowner on the Abbey Mills site allocation.</p>	<p>meet the needs of the local population. The Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>Proposed key route</b></p> <p>We did not consider this change to be necessary as the key route shown in the map is a design principle reflecting the Local Plan's desire to connect the site with the Greenway and West Ham Station. However, we acknowledge that the route can come forward following different iterations and that the optimal street layout that could improve accessibility and placemaking of the proposed residential development will be discussed and agreed at detailed design stage through masterplanning and planning application process. The Council is satisfied that the plan is sound without the proposed changes.</p> <p><b>Lack of community engagement</b></p> <p>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:  <a href="https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh">https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh</a></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>
--	--	---



<p><b>N7.SA2: Twelvvetrees Park and Former Bromley By Bow Gasworks</b></p>	<p><b>Gasholder constraints</b></p> <p>St William Homes requested that N7.SA2 site allocation acknowledges the exceptional abnormal circumstances that relate to a gasholder site.</p> <p><b>Green space provision</b></p> <p>CPRE requested N7.SA2 site allocation is not allocated for housing as the site is designated as a SINC which they believe should be safeguarded for conversion to green open space or tree planning.</p>	<p><b>Gasholder constraints</b></p> <p>We did not consider this change to be necessary as the site allocations do not address viability requirements. Policy BFN4 addresses viability considerations in the Local Plan. For surplus utilities sites, exceptional costs associated with decontamination will need to be factored into a development's residual land value (with scenarios provided demonstrating appraisals for the scheme with and without the decontamination cost), as well as taken into consideration in a development's benchmark land value. The Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>Green space provision</b></p> <p>A change to this policy approach has not been made. We did not consider a change to be necessary as Newham's Green and Water Infrastructure Study has identified a need for the site allocation, N7.SA2 Twelvvetrees Park and Former Bromley By Bow Gasworks, to address green space deficiency by providing a consolidated local park with a minimum area of 2 hectares to service nearby residential neighbourhoods. This reflected in the infrastructure requirements for this site. The Council is satisfied that the plan remains sound without the proposed changes.</p>
<p><b>N8.SA2: Stratford Station</b></p>	<p><b>Clarity of policy wording</b></p> <p>Network rail identified that the development principle for Stratford Station was convoluted and needed more clarity when referring to 'Stratford Station as an area' compared to when referring to 'Stratford Station as the railway station'.</p>	<p><b>Clarity of policy wording</b></p> <p>The Council recognises the importance of ensuring the Plan is clear and has therefore made the following modification.</p> <p>The modification is:</p> <p>'Increased capacity at Stratford Station to be provided through the redevelopment of the ticket hall and new and improved station entrances from Montfichet Road and the Carpenters estate. <del>along</del></p>

	<p><b>Tall buildings</b> Network Rail, Places for London and LLDC proposes additional wording to encourage a more flexible approach to taller buildings on site due to the importance of this strategic site balancing the delivery of infrastructure alongside new and affordable homes.</p> <p><b>Design and Layout</b> Network Rail, Places for London and LLDC proposes additional wording to encourage a more flexible approach to the public realm improvements, including enhanced walking and cycling routes.</p> <p><b>Site allocation map</b> LLDC raised concerns over the level of detail provided on the site allocation map, specifically the location and size of the green space provided, the positioning of the bridge and the location of the decking over the rail tracks.</p>	<p>with, <b>The development of the site allocation will provide</b> residential, employment uses, main town centre uses and social infrastructure including community facilities and education facilities, and open space'</p> <p><b>Tall buildings</b> A change to this policy approach has not been made. The Council considers the policy to be in line with London Plan policy D9, which requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum height that could be acceptable in these locations. More details on the methodology used to identify suitable locations and heights for tall buildings can be found in the Tall Building Annex (2024) and Tall Buildings Topic Paper (2025). The Council is satisfied that the plan is sound without the proposed changes.</p> <p><b>Design and layout</b> A change to this policy approach has not been made. The site allocations have been informed by the Newham Green and Water Infrastructure Strategy and the Newham Characterisation Study to help improve connectivity across the neighbourhood. The Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>Site allocation map</b> We did not consider this change to be necessary as the requirement for publicly accessible green space has been justified by up to date evidence base, through Newham's Green and Water Infrastructure Strategy.</p> <p>The infrastructure requirements for each allocation set out the green, play and growing space that needs to be met on site and the site allocation map provides an illustrative representation of how this could be delivered.</p>
--	--	---

		<p>The quantity and type of green space stipulated in the Local Plan's site allocations has been justified by up to date evidence base, through Newham's Green and Water Infrastructure Strategy.</p> <p>The Bridge shown indicates connectivity across the site. The specific detail regarding how that green space and connectivity is designed and delivered, across the site allocation, will be determined by a co-design masterplan-led approach ahead of and during the pre-application and application stage.</p> <p>However, the Council recognises the importance of ensuring the Plan is effective and as the aspirations for the site is no longer to deck over the rail tracks, the Council is amending the map to show the rail tracks which is included in the modification table.</p>
<b>N8.SA5: Stratford Town Centre West</b>	<p><b>Purpose Built Student Accommodation (PBSA)</b></p> <p>Hadley Property Group requested that the site allocation include wording to support the delivery of PBSA.</p>	<p><b>Purpose Built Student Accommodation (PBSA)</b></p> <p>We did not consider this change to be necessary as the plan is effective. The site allocations only identify the priority land use needs, namely the need to deliver general needs housing as reflected in Policy H1.3. The wording of the site allocation would not preclude housing other than general needs housing being delivered; however, the acceptability of these types of housing on site allocations will be dependent on whether they meet the policy requirements set out in the relevant Local Plan policies. The Council is satisfied that the plan remains sound without the proposed changes.</p>
<b>N9.SA1: Plaistow North</b>	<p><b>Bridge Delivery</b></p> <p>A developer, Populo Living, objected to the requirement for building a bridge over the track due to viability concern and site constraints.</p>	<p><b>Bridge Delivery</b></p> <p>We did not consider this change to be necessary as the proposed route reflects Council's aspiration to improve site accessibility and is supported by feasibility work. The Council is satisfied that the plan remains sound without the proposed changes.</p>
<b>N11.SA3: Alpine Way</b>	<p><b>Proximity to Beckton STW</b></p> <p>Thames Water raised some concerns regarding the consistency in approach taken to sites in proximity the Beckton STW and requested that appropriate mitigation measures are undertaken ahead of delivery of development.</p>	<p><b>Proximity to Beckton STW</b></p> <p>The Council's objective for this policy approach is to address agent of change in vicinity of the existing Beckton Sewage Treatment Works. However, the Council recognises the importance of ensuring the Plan is positively prepared and consistent with National Policy. Therefore, modifications have been made to Beckton and Gallions Reach</p>

	<p><b>Buffering approach to SIL</b> A landowner, LAMIT c/ CCLA Investment Management Ltd objected to the requirement of non-residential stacked industrial building as a typology to buffer the adjacent SIL.</p>	<p>Neighbourhood policies and associated site allocations to ensure odour mitigation measures are undertaken ahead of the occupation of the developments.</p> <p>The modifications are:</p> <p>[N11.12 and N17.14] mitigating the odour impacts of the sewage treatment works <b>ahead of the occupation of developments in the vicinity</b> through appropriate buffering and other design solution;</p> <p>[N11.SA3 and N17.SA1 Phasing and Implementation] <b>Any necessary mitigation to address odour impact from existing odorous uses in the vicinity, including the Beckton Sewage Treatment Works, should be completed ahead of the occupation of development.</b></p> <p><b>Buffering approach to SIL</b> We did not consider this change to be necessary as the buffering typology is sufficiently justified by guidance in the Characterisation Study 2024 and to provide employment capacity to meet the industrial demand in the borough as evidenced in the Employment Land Review 2022. The Council is satisfied that the plan remains sound without the proposed changes.</p>
<b>N13.SA3: Former East Ham Gasworks</b>	<p><b>Green space provision</b> CPRE requested that Former East Ham Gasworks is not allocated for housing as the site includes Metropolitan Open Land which they believe should be allocated for sports/park/recreation.</p>	<p><b>Green space provision</b> We did not consider a change to be necessary as Newham's Green and Water Infrastructure Study has identified a need for the site allocation, N13.SA3 Former East Ham Gasworks, to retain the Metropolitan Open Land and make it publicly accessible. This is reflected in the infrastructure requirements for this site. The Council is satisfied that the plan remains sound without the proposed changes.</p>

	<p><b>Objection to MOL designation</b></p> <p>St Williams Homes LLP argued that Former East Ham Gasworks should be de-designated from Metropolitan Open Land.</p>	<p><b>Objection to MOL designation</b></p> <p>A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council's response has not changed. Please note Newham's MOL Review (2025) includes an update to amend an error not related to your comment. The Council is satisfied that the plan remains sound without the proposed changes.</p>
<p><b>N17.SA1:</b> <b>Beckton</b> <b>Riverside</b></p>	<p><b>Proximity to Beckton STW</b></p> <p>Thames Water raised some concerns regarding the consistency in approach taken to sites in proximity the Beckton STW and requested that appropriate mitigation measures are undertaken ahead of delivery of development. They referenced a main modification made by the Inspector during the previous local plan examination.</p>	<p><b>Proximity to Beckton STW</b></p> <p>The 2018 Local Plan Inspector's report included a Main Modification MM28 to address odour concerns relating to Beckton Sewage Treatment works. The wording of MM28 is included within policy W4 part 4 of the new Local Plan. This requirement would apply to developments within site allocation N17.1 and any other development within 800m of Beckton Sewage Works.</p> <p>As made clear in the Inspector's report, the MM was directed at ensuring that future development proposals suitably assess and mitigate for odour. The wording and intention of the MM is protected in the new Local Plan, with policies W4, D6, N17 and site allocation N17.1 clearly directing applicants to suitably assess and mitigate this amenity impact.</p> <p>The Council's objective for this policy approach is to address agent of change in vicinity of the existing Beckton Sewage Treatment Works. However, the Council recognises the importance of ensuring the Plan is positively prepared and consistent with National Policy. Therefore, modifications have been made to Beckton and Gallions Reach Neighbourhood policies and associated site allocations to ensure odour mitigation measures are undertaken ahead of the occupation of the developments.</p> <p>The modifications are:</p> <p>[N11.12 and N17.14]</p>

	<p><b>Development on the site too contingent on the DLR</b> One landowner, ABRDN, raised concerns that development of the full site allocation, as currently drafted, is too contingent on the delivery of the DLR and that some development around Gallions Reach shopping park should be possible in advance of the DLR or without the DLR.</p>	<p>mitigating the odour impacts of the sewage treatment works <b>ahead of the occupation of developments in the vicinity</b> through appropriate buffering and other design solution;</p> <p>[N11.SA3 and N17.SA1 Phasing and Implementation] <b>Any necessary mitigation to address odour impact from existing odorous uses in the vicinity, including the Beckton Sewage Treatment Works, should be completed ahead of the occupation of development.</b></p> <p><b>Development on the site too contingent on the DLR</b> A change to this policy approach has not been made as the current approach is consistent with national policy and the London Plan regarding out of town centre retail, delivering homes in sustainable locations with suitable transport infrastructure and making the best use of land. The policy is also suitably flexible to enable development to occur under a range of scenarios. In agreement with Transport for London, it is considered that the most sustainable location for this early phased development is the part of the site within easy walking distance of Gallions Reach DLR station. Transformation of the rest of the site remains contingent on delivery of the new DLR station and route. Until the DLR contract is let and transformational development can occur in the northern part of the site allocation, including Gallions Reach Shopping Park, the shopping park remains an out of town centre retail park and will be treated as such in policy. To do otherwise risks entrenching a car-dependent and unsustainable retail location, potentially undermining the delivery of a more sustainable town centre network across the borough and East London and/or the delivery of homes in a poorly connected location (the current retail park has a PTAL of 0 – 2). TfL is in agreement on this point and the Council is satisfied that the plan remains sound without the proposed changes.</p>
--	---	--

	<p><b>Objection to waste infrastructure requirements</b> One developer, St William, raised concerns regarding the requirements for a vacuum waste collection system on southern part of the site.</p> <p><b>Flexibility to manage out of centre retail parks</b> One landowner, ABRDN, raised concerns that the site allocation was too rigid to enable the existing out of centre retail park to adapt and function.</p>	<p><b>Objection to waste infrastructure requirements</b> A change to this policy approach has not been made. We did not consider this change to be necessary as the site allocation requirement is effective and justified. The rationale and viability evidence underpinning this requirement is set out in the Automated vacuum waste collection systems Topic Paper 2024. Policy BFN2 also requires site allocations to undertake co-designed masterplanning. A masterplan is key to demonstrating that the relevant policies in the Plan can be delivered across the site allocation, allowing decision makers to have confidence that permitting smaller parcels of the site won't result in sub-optimal and piecemeal development. The delivery of the allocation across different applications must not preclude the delivery of key Plan objectives and site allocation requirements. The Council is satisfied that the plan remains sound without the proposed changes.</p> <p><b>Flexibility to manage out of centre retail parks</b> The objective of the Local Plan, through the site allocation and policies HS1.2 and HS2, is to provide a framework for the delivery of a new town centre at Beckton Riverside which can serve the needs of the emerging neighbourhood. The Council considers that we have adopted an appropriate balance between the need to carefully masterplan the transition of the local retail and leisure offer from that of an out of centre retail park to that of a town centre, while recognising the existing role of Gallions Reach Shopping Park, and other Beckton retail parks, in serving local needs, as evidenced by the Retail and Leisure Study (2022). The positive approach to the asset management of Gallions Reach Shopping Park is evident from its development management planning history, where the Council has generally approved applications that demonstrate they do not lead to an increase in the intensity of the uses on site (e.g. support for applications for internal alterations or facade amendments), that are not speculative in nature and that pass the necessary sequential and/or impact tests. Nevertheless, the location remains an out of centre retail and leisure destination, which the council must continue to manage in a way which</p>
--	---	--

	<p><b>Mapping</b></p> <p>One landowner, ABRDN, raised concerns that the mapping for the site didn't accurately reflect the proposed future location of the town centre or align with the Royal Docks and Beckton Riverside Opportunity Area Planning Framework mapping for some of the proposed land uses and buffers.</p>	<p>protects the vitality and viability of Newham's existing town centres and its other retail and leisure commitments.</p> <p>However, the Council recognises the importance of ensuring the Plan is clear in its intended application of policy for the management of out of centre retail parks, and has therefore made wording change to policy HS1.2a, HS1.2 implementation section, which are included in the modification table and has drafted modifications, which will be presented to the examiner for their consideration, to policy HS3.1, to better reflect this position.</p> <p><b>Mapping</b></p> <p>A change to the site allocation map has not been made. We did not consider this change to be necessary as the site allocation sets out an indicative location to the town centre for the reasons set out in the Town Centre Network Review Methodology Paper 2022.</p> <p>We note that you reference the following figures in the OAPF: Figure 1.23, which is the existing constraints and opportunities map and figure 2.29 which is a high level strategic vision map for the whole opportunity area. You have not however referenced figure 4.49 in the OAPF which is the detailed place vision for Beckton Riverside. This map and the indicative map in the site allocation show the same locations for the Town Centre, Green Space and Industrial Buffer. The Council is satisfied that the plan is sound without the proposed change.</p> <p>However, we do agree that while the Local Plan Policies Map can only use point data to reflect the requirement of the town centre, as this location is not yet known, it could be better located to be indicatively placed in close proximity to the proposed location of the new DLR station. This is also the case with the Key Diagram. These changes have been made to the Submitted Plan and included in the modifications table.</p>
--	--	--



### 3.8 Regulation 19 Consultation and Engagement activities

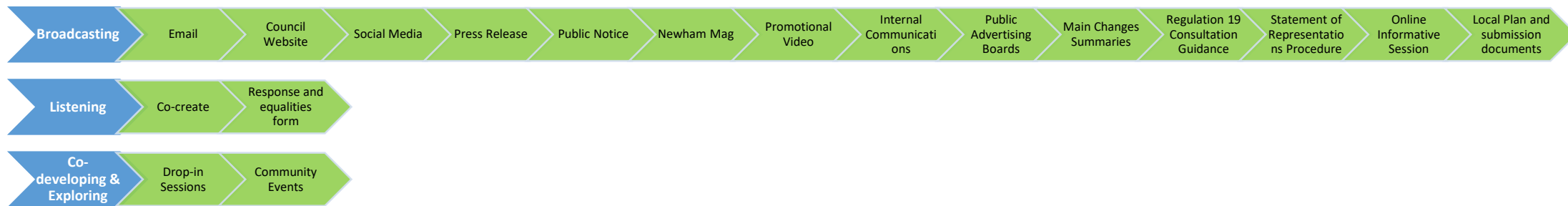
The Local Plan Refresh: Regulation 19 Consultation Strategy outlined the overarching approach for consulting with residents and other stakeholders throughout the Local Plan Refresh process. This approach was adapted at each stage to align with the statutory requirements.

A range of existing and innovative engagement methods were selected to ensure the consultation process reached and engaged as many stakeholders as possible. The primary aim of the engagement strategy for the Regulation 19 consultation was to use methods that would inform stakeholders - particularly those without planning expertise - about the statutory requirements of the Regulation 19 consultation. To achieve this, it was essential to raise awareness among residents about the Local Plan, including its significance, the plan-making process, and the specifics of the consultation process, in accordance with Regulation 19 requirements.

Engagement activities were designed to align with plan-making legislation, national planning policy, and the principles outlined in the Newham Statement of Community Involvement (SCI). To fulfil the statutory requirements of Regulation 19, we made a copy of each proposed submission document and the Statement of Representations Procedure available in accordance with Regulation 35. We implemented innovative and tailored methods to enhance engagement from the previous consultation, by providing the Main Changes Summaries and the Regulation 19 Consultation Guidance document.

The engagement activities were organised into three distinct phases, each with specific objectives (see Figure 3.31):

1. **Broadcasting:** We engaged with stakeholders through various channels including email, the Council's website, social media, a press release, a public notice, a promotional video, internal communications, public advertising boards, Main Changes Summaries, the Regulation 19 Consultation Guidance document, the Statement of Representations Procedure, an online informative session and hard copies of the Local Plan and proposed submission documents.
2. **Listening:** Following the broadcast of the Regulation 19 consultation, we listened to stakeholder responses through various channels. Responses could be submitted via our online response form on Co-create, or through a downloadable response form available on our website, which could be sent by email or post. Hard copies of the response forms were also available at libraries and our Dockside office for postal submissions.
3. **Co-development:** Finally, we organised in-person events where stakeholders could collaborate with us to provide feedback on the Draft Submission Local Plan. Drop-in sessions and community events allowed us to assist stakeholders in submitting responses that met the statutory requirements of the Regulation 19 consultation. We also organised online community events to discuss key issues and the requirements of the Regulation 19 consultation with community groups.



**Figure 3.31: Regulation 19 Consultation Methods**

### 3.8.1 Consultation Methods

#### 3.8.1.1 Broadcasting

##### 3.8.1.1.1 Email

Email distribution lists were used to notify a wide range of stakeholders about the consultation. These emails provided information on the various ways to submit responses and details about the consultation events. This was the primary method of reaching our statutory consultees regarding the Draft Submission Local Plan.

Three rounds of emails were sent to the Planning Policy Consultation database. The first email was sent on the first day of the consultation ([see Schedule 8](#)). The second round of emails was sent out on the 22<sup>nd</sup> August, announcing an extension of the consultation period by two weeks to allow more time for consultees to submit responses, beyond the summer holiday period ([see Schedule 9](#)). A reminder email was sent out with one week remaining in the consultation period ([see Schedule 10](#)).

Although the emails reached 1,632 subscribers in the Planning Policy database, the actual outreach was much broader. This was due to various teams across the council and local organisations forwarding our emails to their subscribers on behalf of the Planning Policy team, as well as those registered on Newham Co-create.

A list of the organisations and stakeholders that assisted in sending the emails to their respective lists is provided below:

- Newham Co-create
- Royal Docks Team
- LLDC Planning Database
- Community Neighbourhoods
- Public Health
- Autism Residents Group
- Ageing Well RAG
- Carer Peer Support Group
- Covid-19 Champions
- Newham Events
- Newham Staff via Newham News
- Business Newsletter
- Older People Reference group
- Community Neighbourhood Managers
- Stratford Vision
- Climate Action Newsletter

Officers within the London Borough of Newham Planning Department included a message about the consultation in their email signatures for those already engaged with the planning system, such as developers and landowners.

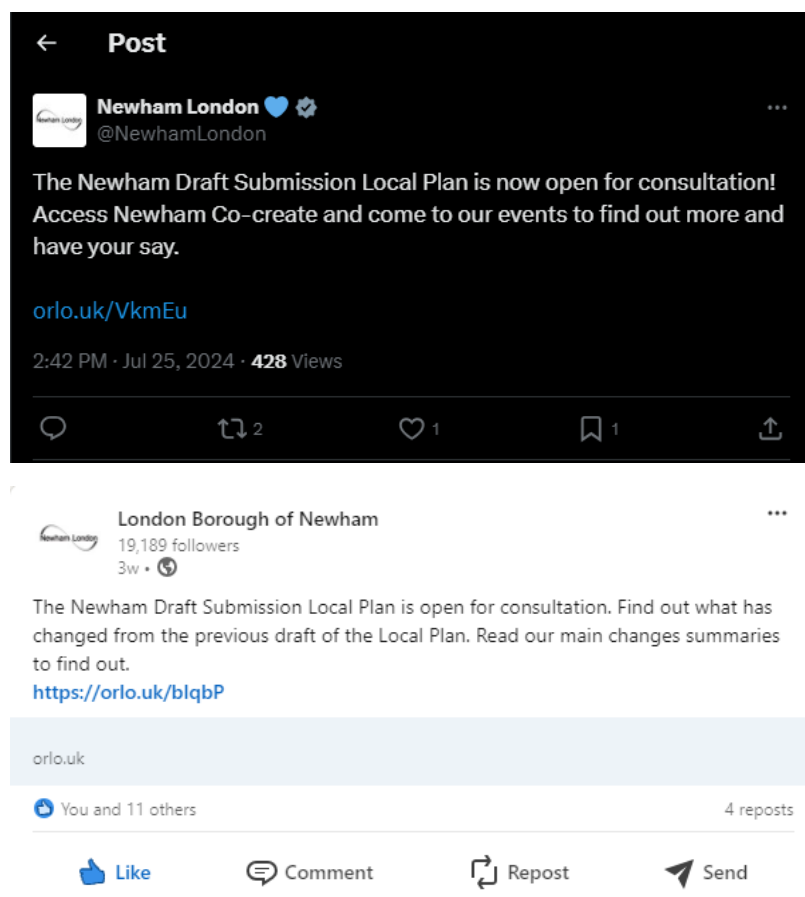
### 3.8.1.1.2 Council Website

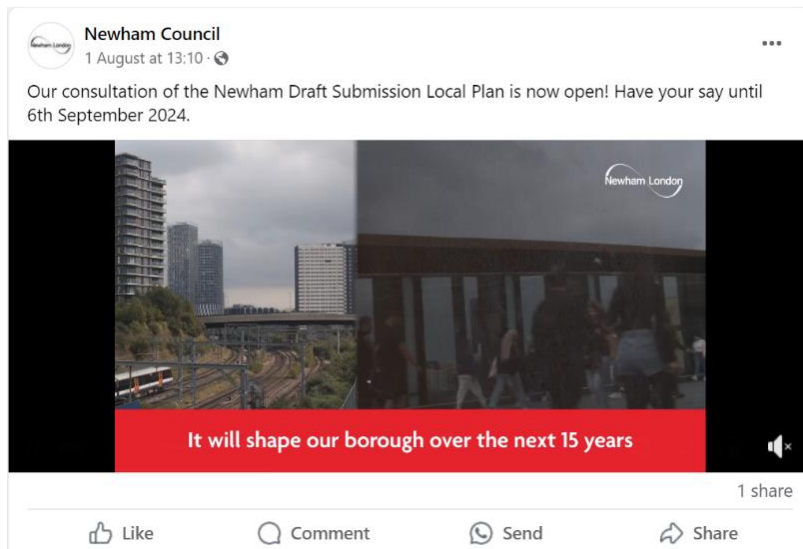
The [Third Consultation: Draft Submission Local Plan \(Regulation 19\)](#) page was published at the start of the consultation period on the 19<sup>th</sup> July 2024. This page hosted the Draft Submission Local Plan along with its supporting documents including the Policies map, previous Consultation Reports (Issues and Options and Regulation 18), Main Changes Summaries, the Duty to Cooperate Statement, and a link to the updated Evidence Base Documents page.

The page outlined the requirements of Regulation 19, with links to the Regulation 19 Consultation Guidance document and Statement of Representations Procedure, which explained how to submit a representation. There were links to Co-create for online engagement, as well as links to the downloadable response form and equalities data form, which could be returned via email, post or in-person. The website also displayed information about the consultation events and how they could be attended ([see Schedule 11](#)).

### 3.8.1.1.3 Social Media

The platforms Facebook, X (formerly twitter), and LinkedIn were used to promote six posts (see Figures 3.32, 3.34 and 3.34) generating 52 likes, 4 comments, 21 shares/reposts, and 2578 views/impressions (impressions were only recorded on LinkedIn).

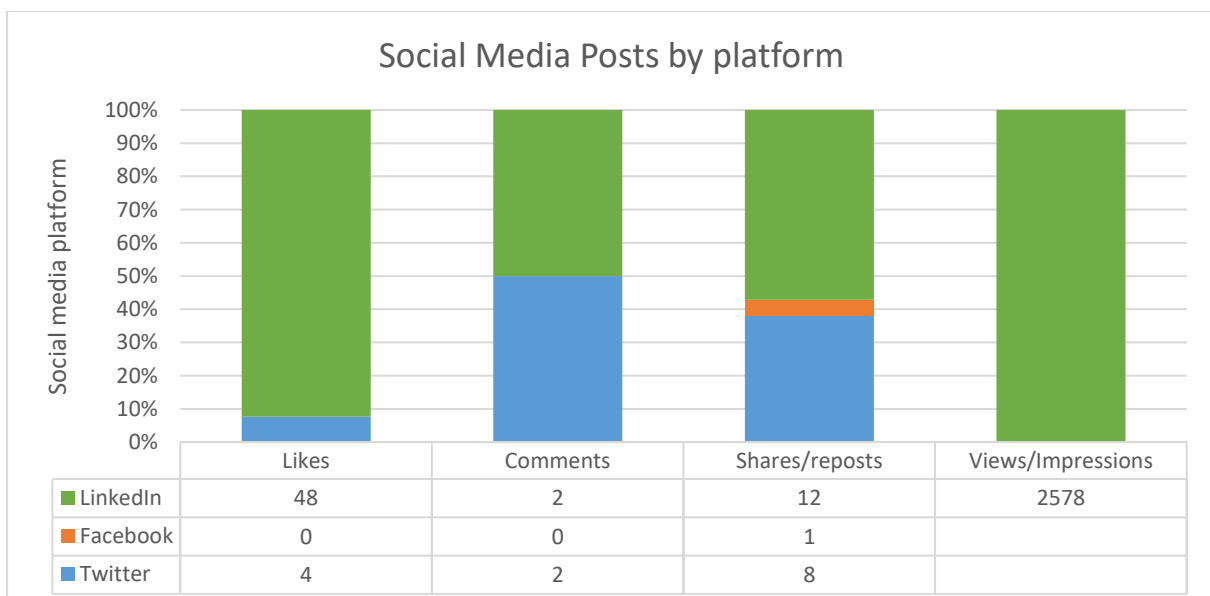




**Figures 3.32, 3.33, 3.34: Social media posts across X (Twitter), LinkedIn and Facebook**

LinkedIn generated the most engagement across all three metrics. Twitter also performed well in terms of shares/reposts, helping to extend the reach of our posts and generate more views. Facebook performed poorly in terms of likes, comments and shares/reposts; the number of views or impressions on Facebook is unknown. The poorer performance on Facebook could be due to the council's switch to a new page in the past year, which may have limited its reach compared to its other social media platforms (see Figure 3.35).

These posts promoted the launch of the consultation, inviting people to engage using Newham Co-create, sharing our promotional video, and encouraging attendance at our events. We also invited readers to review changes from the previous Draft Local Plan by promoting our Main Changes Summaries. Social Media was also used to announce the extension of the consultation period by two weeks, until 20<sup>th</sup> September 2024, as well as to send a reminder that there were two weeks remaining in the consultation period.



**Figure 3.35: Social Media posts by platform**

#### 3.8.1.1.4 Public Notice and Press Release

Our public notice was published in the Newham Recorder five days after the beginning of the engagement period, on the 24<sup>th</sup> of July. This was the next edition of the Newham Recorder to be published after the launch of the consultation, providing six weeks' notice before the original consultation end date. The notice aimed to reach digitally excluded residents or those without access to social media. It outlined what the Local Plan is, the relationship to the LLDC transition, the consultation dates, events, and the various methods used to provide comments ([see Schedule 12](#)).

Additionally, a press release was published in the Newham News on the [Council's website](#) on the 24<sup>th</sup> of July, informing residents that the Local Plan was open for consultation and urging them to get involved ([see Schedule 13](#)).

This approach ensured a balance between digital and print media channels, aiming to encourage readers to provide feedback on the draft Local Plan.

#### 3.8.1.1.5 Newham Mag

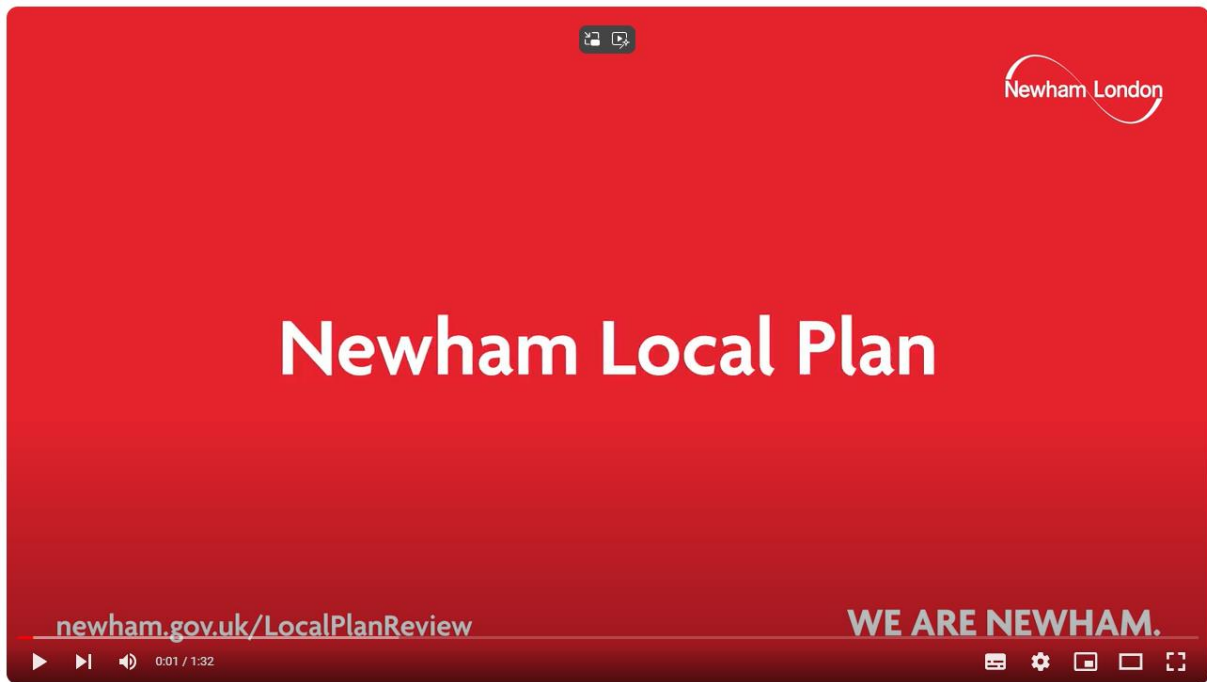
An article about the Local Plan was also included in the Newham Mag ([see Schedule 14](#)). The article outlined the purpose of the Local Plan and invited residents to engage with the consultation through Newham Co-create, either by scanning the QR code or visiting a local library to view hard copies of the Local Plan and consultation documents. A total of 114,000 copies of the Newham Mag were delivered to addresses across Newham, with 4,000 distributed to libraries and community centres.

This use of print media was one of the methods we used to help ensure we reached those who are digitally excluded, so all our stakeholder had the opportunity to engage in the consultation.

#### 3.8.1.1.6 Promotional Video

The promotional video for the Draft Submission Local Plan (Regulation 19) consultation (see Figure 3.36) explained the aim of the Local Plan and invited viewers to engage. It outlined the ways they could participate in the consultation and submit a response. The video was published on the 19<sup>th</sup> July across various channels, including the Council's website, Co-create and YouTube. It was then updated following the extension of the consultation period by two weeks to the 20<sup>th</sup> September 2024. The promotional video effectively conveyed the key messages of consultation in a short, easily digestible format, making it engaging for residents while informing them on how to participate.

Please see the video [here](#).



Newham Local Plan Review

**Figure 3.36: Promotional Video**

#### 3.8.1.1.7 Internal Communications

Internal communications were used to inform Council staff about the Regulation 19 consultation. Promotional materials were shared through Newham News ([see Schedule 13](#)) and the intranet for distribution among staff. The Planning Department was also provided with an email signature to promote the consultation. This approach informed staff about the consultation, encouraged them to respond as key stakeholders, and prompted them to share the details with residents and other stakeholders they work with.

#### 3.8.1.1.8 Public Advertisement Boards

Public advertisements were displayed across the borough on advertising boards along high streets (see Figure 3.37). The adverts promoted the launch of the consultation and informed stakeholders about how they could engage online, at libraries, and at our events. The graphics were designed in line with the council's branding guidelines and included a QR code that directed people to Co-create ([see Schedule 15](#)). Additionally, smaller posters were placed on library bulletin boards. This approach aimed to reach people living and working in Newham, particularly those who are digitally excluded by engaging with them as they went about their daily activities.



**Figure 3.37: Public advertising board in Newham**

### 3.8.1.1.9 Main Changes Summaries

The Main Changes Summaries outlined the key changes from the Draft Local Plan (Regulation 18) to the Draft Submission Local Plan (Regulation 19), providing a summary for each of the 11 sections of the Local Plan (see [here](#)). These documents were available to view on the Council's website, on Newham Co-create, and were also provided for attendees to view at the Drop-in sessions. The Main Changes Summaries included a QR code with a link to Newham Co-create, allowing people to find out more about how to engage with the Local Plan consultation ([see Schedule 16](#)).

### 3.8.1.1.10 Regulation 19 Consultation Guidance

The [Regulation 19 Consultation Guidance](#) aimed to bridge the gap in accessibility by providing those without prior knowledge with an explanation of the statutory requirements of the Regulation 19 consultation. This method of engagement was key to the consultation, as the statutory requirements of the consultation could make it inaccessible for those without prior knowledge of the planning system or consultation process.

The document explained the four tests of soundness by which the Local Plan will be judged to determine whether it is sound or unsound, as well as the legal compliance requirements of the Local Plan. It also provided guidance on how to write a representation, including examples of how to comment on the soundness or legal compliance of the Local Plan.



Additionally, it outlined the various methods people could use to submit responses, details about the availability of documents, and information about the consultation events. The final section informed stakeholders about what happens after the consultation period.

#### 3.8.1.1.11 Statement of Representations Procedure

This method of engagement is a statutory requirement as part of the Regulation 19b of the Town and Country Planning (Local Planning) (England) Regulations 2012. To comply with this regulation, we made the Statement of Representations Procedure available at local libraries and our Dockside office. The document included details of library and office locations and opening times, ensuring that the Local Plan and supporting materials were readily accessible to readers, as required by Regulation 19b.

As a statutory document, the Statement of Representations Procedure included several specific features mandated by law. According to Regulation 17 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the Statement of Representations Procedure must specify: the title of the Local Plan, the subject matter covered, the deadline for submitting representations, the address for submitting representations, and that representations may be made in writing or electronically. Additionally, it must state that representations may be accompanied by a request to be notified about the submission, publication and adoption of the Local Plan.

The Statement of Representations Procedure was amended on 22<sup>nd</sup> August 2024, following the extension of the consultation period by two weeks, until the 20<sup>th</sup> September 2024. Section 4.1 of the [Statement of Representations Procedure \(updated August 2024\)](#) was revised to reflect the new submission deadline, in accordance with Regulation 17.

#### 3.8.1.1.12 Online Informative Session

This online event provided residents with an introduction to Local Plans, overview of the Draft Submission Newham Local Plan, outlining its structure and main policy changes, an explanation of the Regulation 19 consultation, and guidance on how to provide responses using the online or downloadable response forms (see Figure 3.38). It also offered residents the opportunity to ask any questions during the Q&A session with members from the Planning Policy Team and the Director of Planning and Development.

The online session was recorded. The recording, along with the slides and answers to questions from the session, were made available on our website.



**Figure 3.38: Online Informative Session: What will this session cover?**

#### 3.8.1.1.13 Hard Copies of the Draft Submission Local Plan and proposed submission documents

Hard copies of the Draft Submission Local Plan were made available at all local libraries and our principle office (see Figure 3.39), as required by Regulation 19 of the Town and Country Planning Act 2012. We also provided four hard copies of the Local Plan at our Drop-in sessions for attendees to read and use when submitting representations. Additionally, residents with limited mobility or those needing to shield were able to request the delivery of the Local Plan, ensuring that no one in the borough was excluded from engaging in the consultation.

We also provided hard copies of the proposed submission documents at libraries and our events:

- Regulation 19 Consultation Guidance
- Statement of Representations Procedure
- Representation and equalities data forms
- Main Changes Summaries
- Policies map
- Integrated Impact Assessment and appendices
- Consultation posters
- Regulation 18 Consultation Report.

The Statement of Representations Produce informed stakeholders that they could also request printed copies of the other evidence base documents, enabling those who were digitally excluded to view all supporting evidence related to the preparation Local Plan.



**Figure 3.39: Hard copy of the Local Plan and supporting documents on display at Beckton Globe Library**

### 3.8.1.2 Listening

#### 3.8.1.2.1 Co-create

[Co-create](#) is an online consultation platform used by the Council to provide a space for displaying the Draft Submission Local Plan, alongside digital tools such as Esri-powered GIS, which displays the interactive Policies map (see Figure 2.40). The Policies Map allowed users to easily explore the Neighbourhoods chapter of the Draft Submission Local Plan. By clicking on each site allocation and neighbourhood, users could see the relevant policies in a pop-up window. Co-create also allowed users to submit responses using the online response form (see Section [3.8.1.2.2](#)). Further down the webpage, there were links to the Main Changes Summaries (see Section [3.8.1.1.9](#)) and details about the consultation events, including a link to sign up to the Online Informative Session through Eventbrite.

Co-create was available to be accessed via the QR code and web links displayed across our consultation materials, at our events, and on our website.



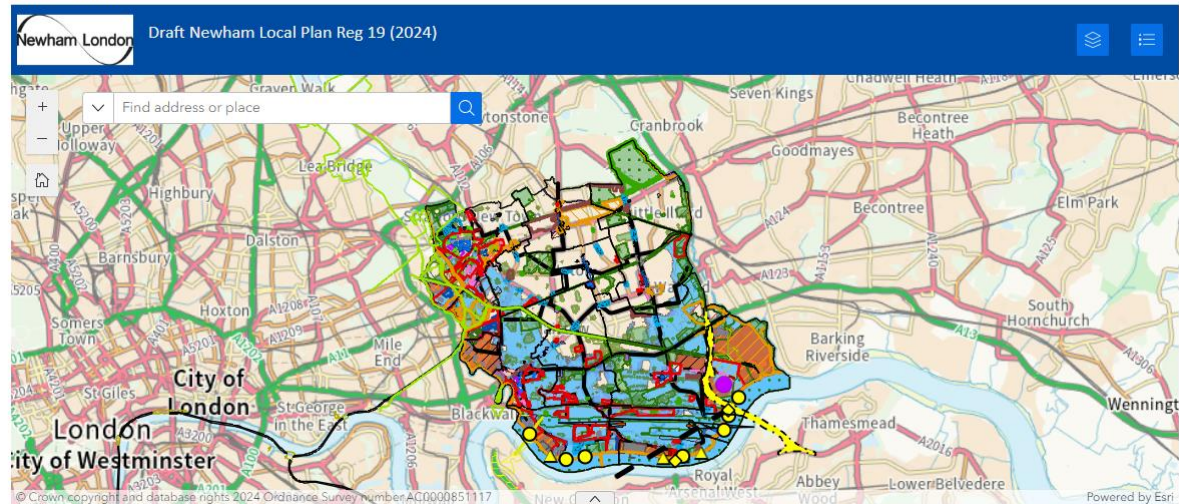
## Local Plan and supporting documents

Read the **Newham Draft Submission Local Plan**. Due to file size this split into two parts:

- [Part 1 \(Introduction, Vision and Objectives and policies\) \(PDF\)](#)
- [Part 2 \(Neighbourhoods and Appendices\) \(PDF\)](#)

See our [interactive Policies Map](#) (opens in a separate webpage) or the [Submission Policies Map \(PDF\)](#).

Our interactive Policies Map can also be viewed below and allows you to easily view the Neighbourhoods chapter of the Draft Submission Local Plan. Clicking on the site allocation or neighbourhood on the map will bring up a pop up with a link enabling you to view the relevant policies for each neighbourhood and site allocation.



**Figure 2.40: Interactive Policies map on Newham Co-create**

### 3.8.1.2.2 Response and Equalities forms

Stakeholders were able to submit written responses via our response form, which was available to download on our website and Newham Co-create, or using the online response form via Newham Co-create.

Physical copies of the response and equalities form were also available alongside the Regulation 19 Guidance documents at our drop-in sessions, libraries and Dockside office. The response form could be submitted to us via email to [localplan@newham.gov.uk](mailto:localplan@newham.gov.uk) or by post to Newham Dockside. The variety of options ensured people who might otherwise be digitally or physically excluded could respond to the Local Plan.

The response form was based on a template provided by central government. The council required participants to enter their Full Name and contact details so they could be identified by the Planning Inspector during the examination. The form was divided into two parts: Part A (personal details) and Part B (your representations).

#### Part A

This section required participants to enter their full name and contact details so they could be identified by the Planning Inspector at the examination. This is a statutory requirement as part of the Town and Country Planning Act 2012. However, their personal details (i.e. address, phone number, email address etc.) were kept anonymous and have not been published.

#### Part B

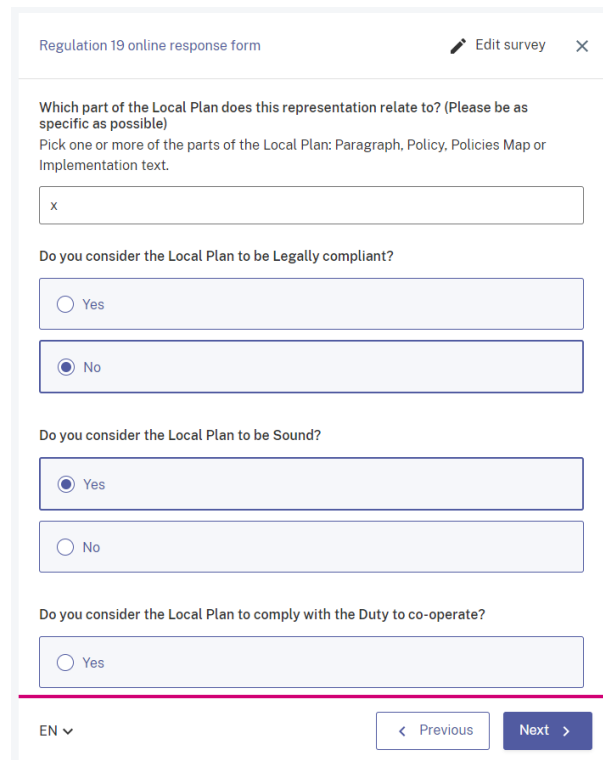
This section was the main part of the response form where respondents could indicate whether they considered the plan to be legally compliant, sound, or compliant with the Duty to Cooperate (see Figure 3.41), and provide their reasoning. They could also suggest modifications they considered necessary to make the Local Plan legally compliant or sound.

If participants provided a response, they were asked whether they wished to participate in an examination hearing session and to provide their reasoning.

Finally, respondents were asked if they wish to be notified about the submission, publication and adoption of the Local Plan, as required by Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

### Part C

This section was an optional section and was hosted separately to ensure anonymity. The equalities form aimed to gather demographic information from respondents to assess the representation of participants and enhance inclusivity for future consultations. We also sent out a reminder email asking representors to fill out the equalities form once the consultation period had ended to encourage as many of the representors as possible to complete it.



**Figure 3.41: Online Response Form Part B**

Stakeholders could also submit a response through the online response form on Newham Co-create. This had a similar format as the downloadable response form, but was presented in survey format and was divided into three parts: Part A (personal details), Part B (your representations) and Part C (equalities form). The survey format allowed respondents to include up to 10 representations per online form, with each representation addressing a specific part of the Local Plan. If respondents wished to submit more than 10 representations, they had to complete the online form again.

### 3.8.1.3 Co-developing & Exploring

#### 3.8.1.3.1 Drop-in Sessions

We held four drop-in sessions at various libraries and local centres around the borough, including two weekend sessions and two mid-week sessions, at different times of day (see Table 4). This schedule was designed to accommodate as many stakeholders as possible, considering their varying schedules and availabilities.

Events	Date	Location	Location
Drop-in Session 1	Saturday 27 <sup>th</sup> July 2024 14:00-16:00	East Ham	East Ham Library
Drop-in Session 2	Tuesday 30 <sup>th</sup> July 2024 18:30-20:30	Beckton & Royal Docks	Royal Docks Learning & Activity Centre
Drop-in Session 3	Thursday 8 <sup>th</sup> August 2024 10:00-12:00	Canning Town & Custom House	Canning Town
Drop-in Session 4	Saturday 10 <sup>th</sup> August 2024 10:00-12:00	Stratford	Stratford Library

**Table 4: Consultation Events dates and locations**

During the sessions, we invited residents to view the Draft Submission Local Plan and its evidence base, as well as supporting materials such as the Main Changes Summaries. These summaries helped attendees understand the changes from the Draft Local Plan to the Draft Submission Local Plan.

Members of the team were also available to answer any questions residents had about specific areas of the Local Plan or the Regulation 19 consultation at these sessions. We used the Regulation 19 Consultation Guidance and the Statement of Representations Procedure to explain the requirements of the Regulation 19 consultation and how to submit a valid representation using the online or downloadable response forms. Residents were also given the opportunity to complete and submit a hard copy response form and/or to sign up to our mailing list to receive updates about future progress related to this Local Plan.

#### 3.8.1.3.2 Community Events

This engagement method aimed to increase participation from residents who had not been reached in previous consultations. We identified representatives of communities that were underrepresented in earlier rounds, as well as community representatives relevant to specific policies.

A total of 63 relevant groups were identified and sent personalised emails. These emails asked if we could attend a meeting the organisations were hosting so we could explain the Local Plan consultation, present the main policies that might be of interest to their group, and detail the process for submitting a formal representation to the consultation. The emails also included a link to the Regulation 19 guidance document. This approach aimed to tailor engagement efforts to specific community needs and foster meaningful discussions on the proposed policies.

In response to these invitations, we held community events with several community groups, including the Inter-Faith Forum, One Newham, Stratford BID and the Homelessness Forum. All of the meetings discussed the Local Plan, Regulation 19 consultation and how to provide comments. The

events also gave the group an opportunity to discuss specific policies in the Draft Submission Local Plan that were of interest to the community groups.

We attended the Inter-Faith Forum with ten attendees and one councillor. The key policies discussed were Policy SI1, Policy SI2 and the Burial Space Policy. The discussion largely focussed around the challenges of delivering community spaces and the flexibility in adapting heritage buildings for community uses while preserving their character.

The One Newham event was held with 12 attendees. The main topics discussed were around the delivery of homes that could be adapted for disabilities, disabled parking provision, lack of development focus on areas outside of Stratford and Royal Docks, concerns of the effectiveness of People Powered Places, the quality of Special Educational Needs and Disabilities (SEND) provision, the lack of Pupil Referral Units (PRU), the need for more green and water spaces, the lack of coordination over current green space maintenance, and child obesity.

The Stratford Bid event was held with two representatives of the Stratford Business Improvement District to discuss the Regulation 19 Local Plan. The discussion focused on the Neighbourhood Policy N8 Stratford and Maryland, the High Streets Policies, and support for cultural activities as part of the Stratford Vision Strategy.

The Newham Homelessness Forum was held with five members to discuss the Regulation 19 Local Plan. This discussion focused on housing policies that seek to address the needs of homeless residents and residents requiring specialist and supported accommodation in the borough.

### 3.8.2 Equalities & Accessibility

The methods used in the Regulation 19 consultation were designed to comply with the requirements of the Equality Act 2010. To ensure inclusivity, we adopted an equitable approach to engagement by providing alternatives for the stakeholders who might otherwise have been digitally and/or physically excluded.

At the broadcasting stage, we used press releases, public notice, and public advertising boards to promote the launch of the consultation and our Local Plan events. The council website has a browse-aloud feature, which enabled individuals who cannot read English to listen to the content of the consultation information in English, as well as in several other languages spoken in the borough. This feature was highlighted to residents in the Regulation 19 Consultation Guidance, as shown below (see Figure 3.42).



**Figure 3.42: Extract from the Regulation 19 Consultation Guidance**

At the broadcasting stage, we also made hard copies of the Local Plan, supporting documents and consultation materials available for those who were digitally excluded to view the materials in person. Residents with limited mobility or those needing to shield could request delivery of the Draft Submission Local Plan and a representation form. We provided multiple submission methods, both by mail and online, to enable those physically or digitally excluded to participate in the consultation.

During the co-developing and exploring stage we hosted in-person events at locations in town centres across the borough, as well as online events at various times, including weekends, weekdays, mornings, afternoons, and evenings. This ensured we provided diverse opportunities for participation. Additionally, we held events with several community groups.

### 3.8.3 Duty to Cooperate

The council has engaged with both its prescribed and non-prescribed Duty to Cooperate bodies throughout the Local Plan Refresh process on strategic cross-boundary matters. Evidence of this cooperation can be found in the Duty to Cooperate Report 2024 and Addendum 2025 and the Statements of Common Ground.



## 3.9 Overview of Consultation Responses

This section provides an analysis of the respondents to the Regulation 19 consultation, the methods of engagement used and the main issues raised. The analysis highlights key learnings from the Regulation 19 consultation and provides a comparison in the representation of responses from the Regulation 18 consultation.

A total of 335 representations were submitted by representors during the Regulation 19 consultation, of these representations 3,272 comments were made.

Some key terms in this analysis are defined as follows:

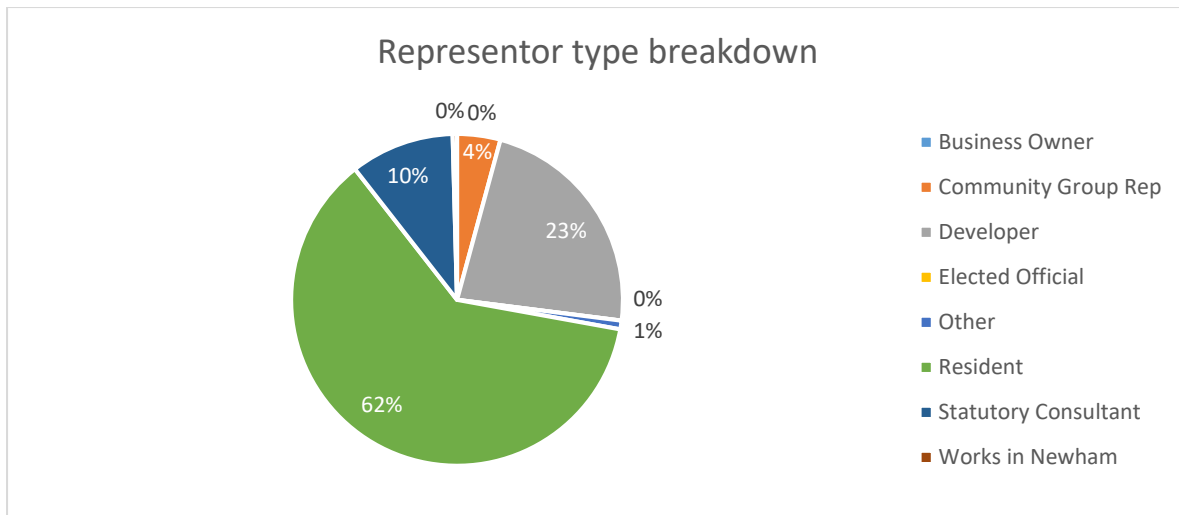
- **Representor:** A stakeholder who has submitted a representation.
- **Representation:** A single submission, of which a representor can submit many.
- **Comments:** The individual points made in a representation, addressing a policy, site, neighbourhood, or the Local Plan in general.

It is important to note that the demographic data for this analysis was collected through a voluntary and anonymous equalities survey. Out of a total of 335 representors, only 53 completed the equalities survey, and only 28 consented for us to use their demographic data, as participation was voluntary. As a result, the demographic analysis may not fully represent the range of representors who participated in the Regulation 19 consultation.

There were 20 non-duly made representations. These were representations that were either a late submission, blank emails without any attachment or emails where the document format was not supported, meaning they couldn't be accessed. The representors who submitted these representations were notified and asked to resubmit, but no reply was received. None of these representations have been processed or considered.

### 3.9.1 Representors

Figure 3.43 displays the distribution of respondents to the Regulation 19 consultation by representor type. The most common representor type were residents, constituting 62% of representors increasing by 5.3% from the Regulation 18 consultation. Developers followed as the second largest group at 23%, rising by 5.5% from Regulation 18, followed by statutory consultees at 10% and community group representatives at 4%.



**Figure 3.43: Representor type breakdown**

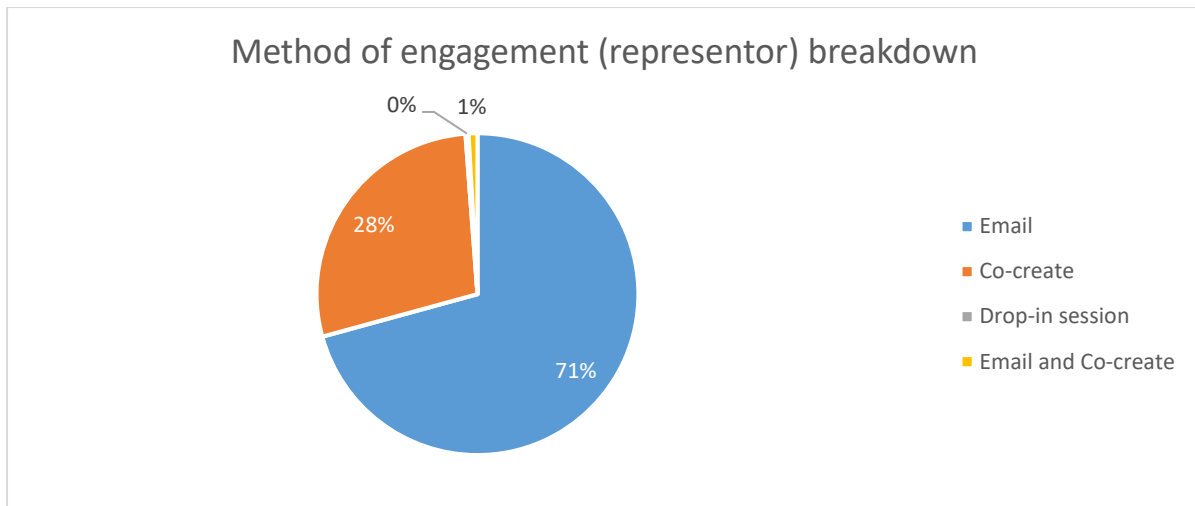
The increase in developers' share of representors was anticipated due to the increased statutory requirements on submissions at the Regulation 19 consultation. At this stage, submissions are required to address the Local Plan's soundness and legal compliance. Despite the added complexities, the share of resident responses increased compared to the Regulation 18 consultation. This outcome highlights the success of Newham's ongoing efforts to engage residents throughout the Local Plan refresh process.

### 3.9.2 Methods

This section will analyse the breakdown of methods used by representors to submit their representations (see Figure 3.44) and illustrate the engagement methods used by different representor types. It will also identify which method generated the most comments (see Figure 3.45).

#### 3.9.2.1 Breakdown of methods by representor

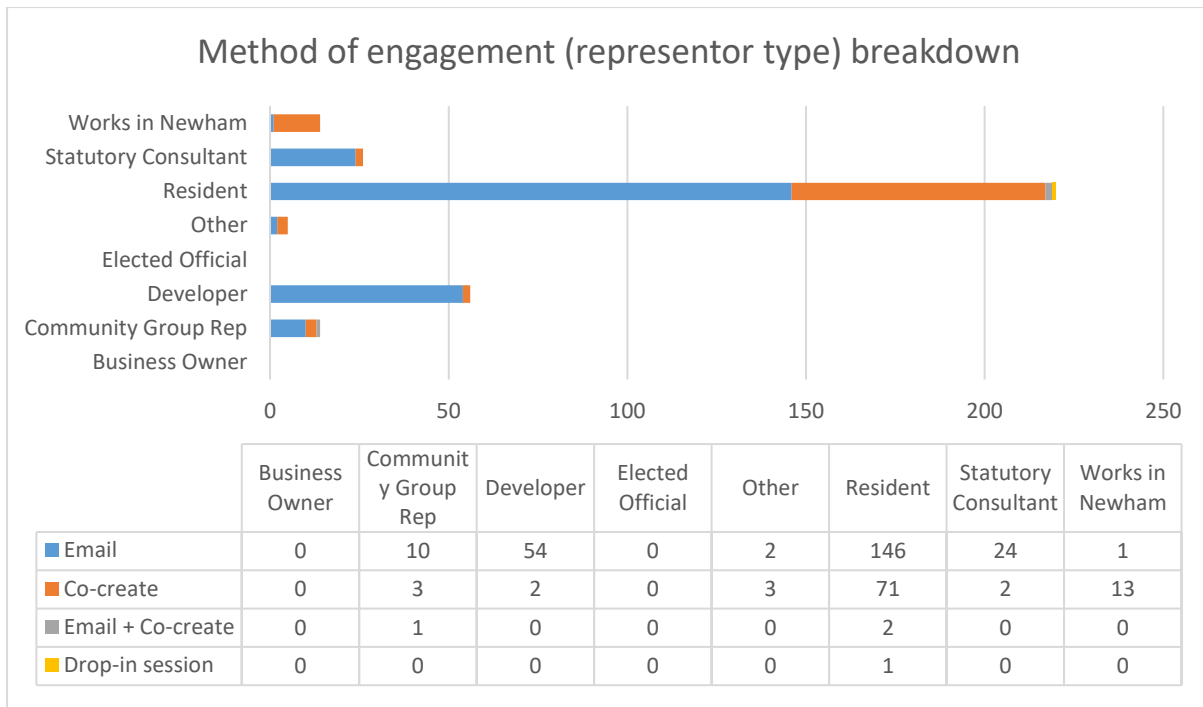
Figure 3.44 shows that Email was the most popular method of engagement, with 71% of representors preferring this method. This was followed by Co-create at 28%, with 1% using both email and Co-create, and 0.3% using the drop-in session to submit their representation.



**Figure 2.44: Preferred method of engagement by representor**

Compared to the Regulation 18 consultation, there was a notable shift towards email, which rose from 46%, while Co-create fell from 54%. During the Regulation 18 consultation we utilised questionnaire software (Typeform) and an interactive tool (Konvio) that allowed representors to leave comments on the Plan. The decrease in the use of Co-create may be attributed to the increased statutory requirements at Regulation 19, which required representors to provide more formal responses addressing specific questions about the soundness and legal compliance of the Local Plan. These requirements meant Konvio could not be used for participants to leave short comments on the Local Plan, thereby reducing the share of representations made on Co-create at Regulation 19.

The analysis of engagement methods by representor (see Figure 3.45) revealed variations in preferred methods. Representors working in Newham were the most likely to use Co-create, with 93% opting for this method. For all of the remaining representors, email was the most popular method. Specifically, 96% of developers, 92% of statutory consultees, 71% of community group representatives, and 66% of residents submitted their responses via Email. A small percentage of Community Group Representatives and Residents used both Email and Co-create to submit their representations, while only one resident submitted their response at a drop-in session.

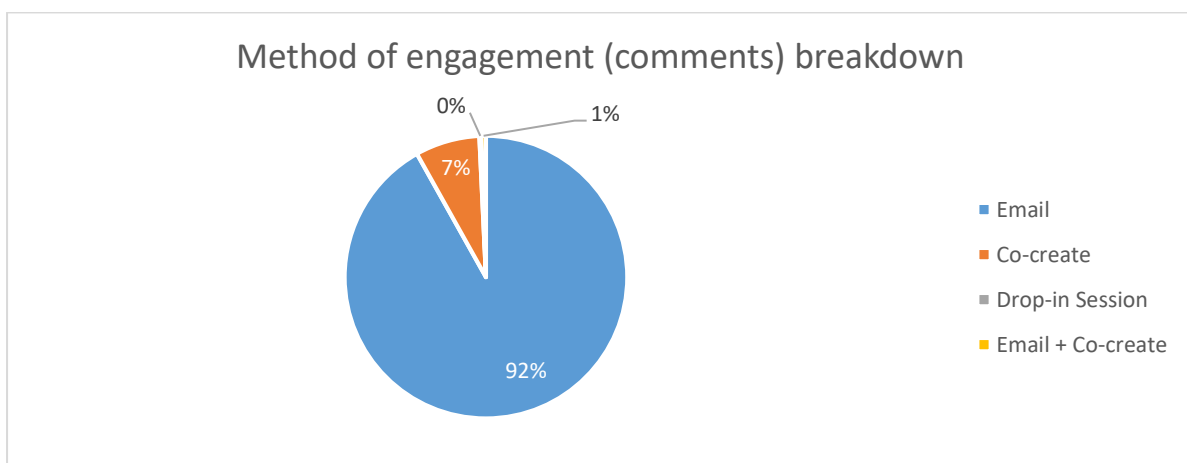


**Figure 3.45: Method of engagement by representor type**

### 3.9.2.2 Breakdown of methods by comments

The analysis of the comments (see Figure 3.46) from the Regulation 19 consultation found email to be the most popular method of engagement, 92% of comments were submitted by email, rising by 35.5% from the Regulation 18 consultation. This was followed by Co-create which delivered 7% of the comments; submissions through both email and Co-create as well as submissions from the drop-in sessions generated less than 1% of comments.

There were limited submission methods at the Regulation 19 consultation due to its statutory requirements. Regulation 19 required a standardised response form which could be submitted via email, Co-create or in-person at the drop-in sessions. This standardised format and the requirements for more formal responses on the soundness and legal compliance of the Local Plan may have been why more respondents opted to use email as their preferred method.

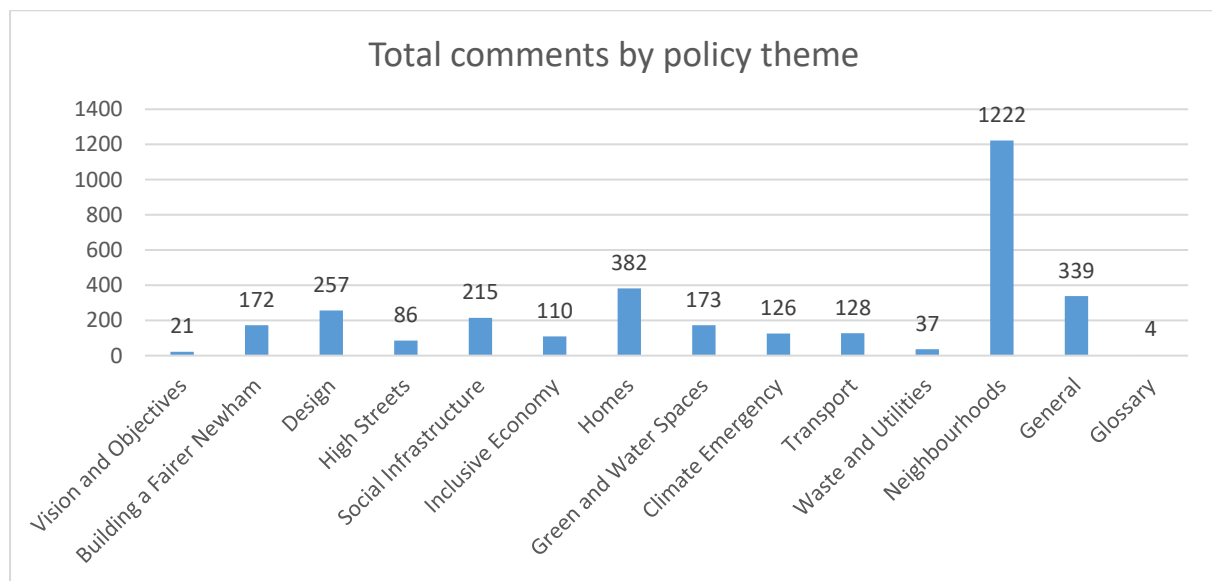


**Figure 3.46: Method of engagement breakdown by comments**

### 3.9.3 Themes

In the process of collating the 335 representations made at the Regulation 19 consultation, we processed representations into comments, before categorising these comments according to the chapters of the Draft Submission Local Plan. Comments that had no direct policy link were collated into the General theme, which included general introductory remarks made by representors.

Our analysis of the comments data (see Figure 3.47) revealed Neighbourhoods to be the policy theme which elicited the most responses, with 1222 comments, followed by Homes with 382 comments and General with 339 comments. The Neighbourhoods chapter also includes the site allocations explaining why a large proportion of the comments were made on this chapter.



**Figure 2.47: Total comments by policy theme**

### 3.9.4 Demographics

Figures 3.48 to 3.54 present the demographic analysis of representors by age, disability, ethnicity, sexual orientation, faith, employment status and sex/gender. Data was not collected for all the protected characteristics, such as marital status and pregnancy, as they were not considered to be relevant to this consultation.

Out of a total of 335 representors, only 53 completed the equalities form, and only 28 consented for us to use their demographic data, as participation was voluntary. Due to the small sample size, the results of the equalities form may not be wholly representative of the representors. We attempted to improve the engagement by sending out reminder email at the end of the consultation period to ask representors to complete the equalities form.

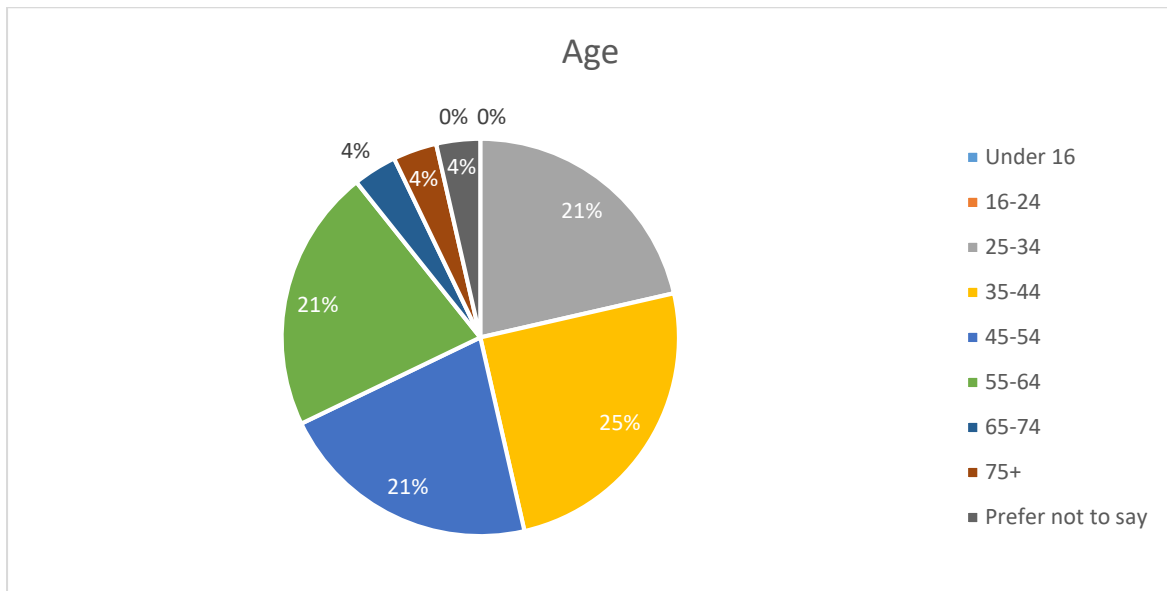
This consultation sought to be more representative of Newham's population than previous consultations by targeting groups who were underrepresented at the previous consultations. The following analysis details areas of improvement in representational diversity and identified demographic groups that remain underrepresented. To evaluate the representational accuracy, the demographic data from the equalities survey is measured against the 2021 Newham Census data.

The findings of this analysis indicates where improvements are needed in future Local Plan consultations, to better reflect the borough's diverse population.

### 3.9.4.1 Age

The analysis of the demographic data revealed a gap in the representation of young people in the consultation. While 13.2% of Newham's population were aged between 16-24, there were no representors accounted for in this age group. Conversely, those aged between 35-64 were overrepresented, making up 67% of representors despite representing only 58.4% of Newham's population. Additionally, there was a strong representation of 65+, who accounted for 8% of representors compared to 7.1% of Newham's population.

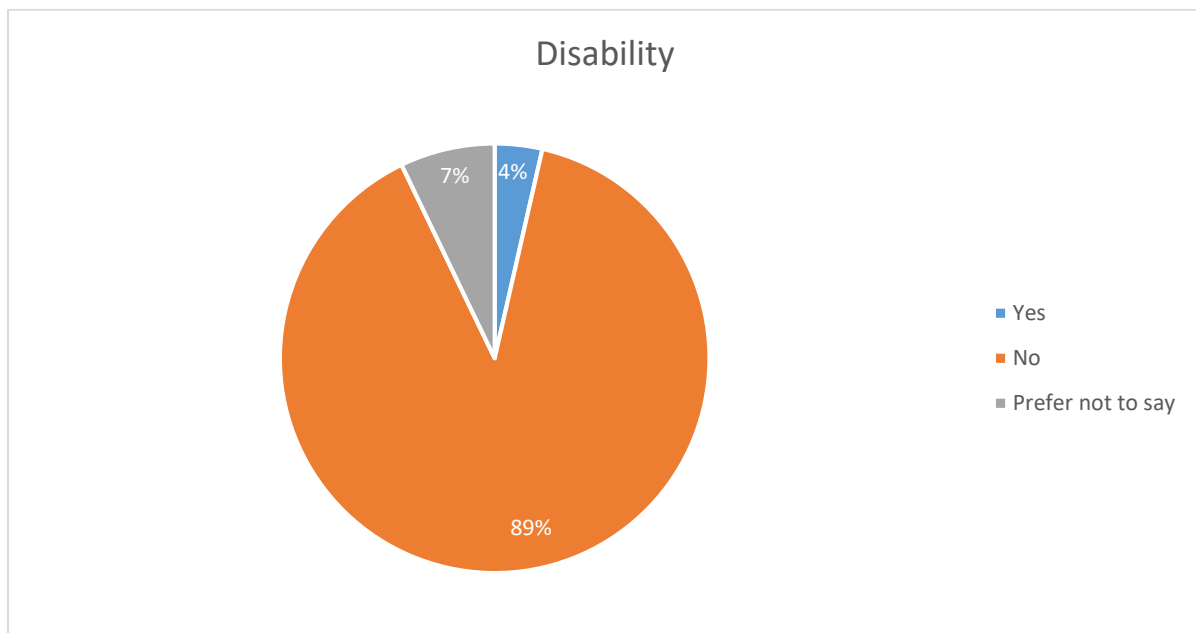
The lack of representations from young people may be attributed to the increased statutory requirements at the Regulation 19 stage, which require more formal, structured responses addressing the Local Plan's soundness and legal compliance. These requirements may have made participation less accessible for younger individuals, as this stage demands a higher level of engagement with complex planning policies. However, we did have a submission on behalf of a group of young people aged 12-15 at Beckton Youth Zone. The comment was processed as a submission from the youth worker, who submitted representations on their behalf. We couldn't process them individually as we didn't have the names of the young people to process their representations.



**Figure 3.48: Age**

### 3.9.4.2 Disability

The analysis of the disability data found disabled people to be underrepresented in the Regulation 19 consultation. The data revealed 7% of the participants identified as disabled, as opposed to 17.5% of Newham's population. Whereas, those identifying themselves as not-disabled are slightly overrepresented, accounting for 89% of representors in comparison to 82.5% of Newham's population. The underrepresentation of those identifying themselves as disabled may be due to participants choosing not to disclose their disability status, with 7% of participants opting to prefer not to say.

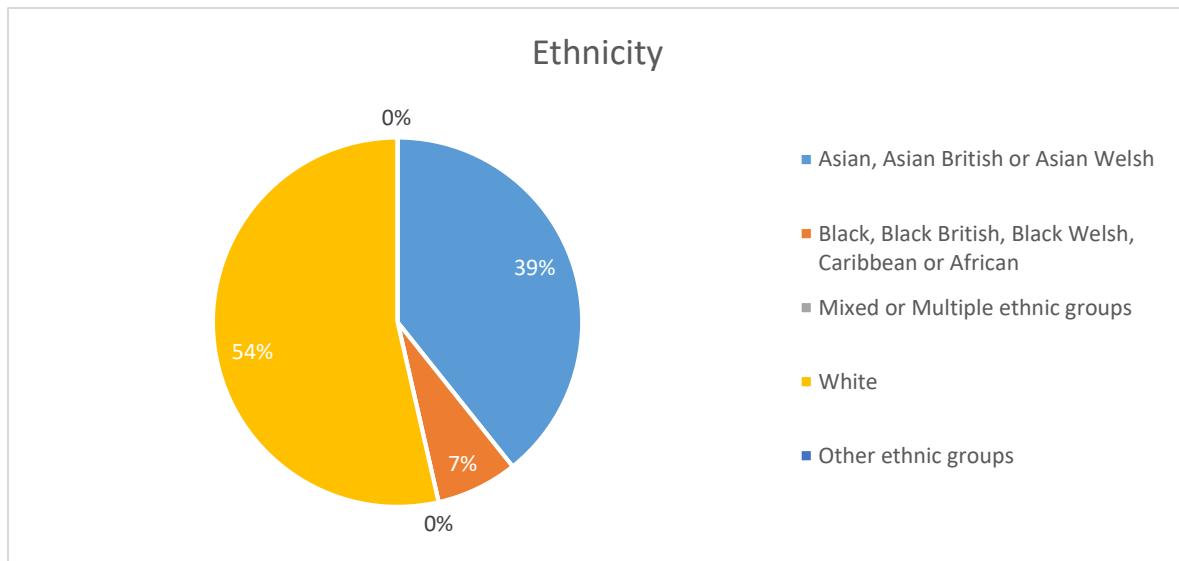


**Figure 3.49: Disability**



### 3.9.4.3 Ethnicity

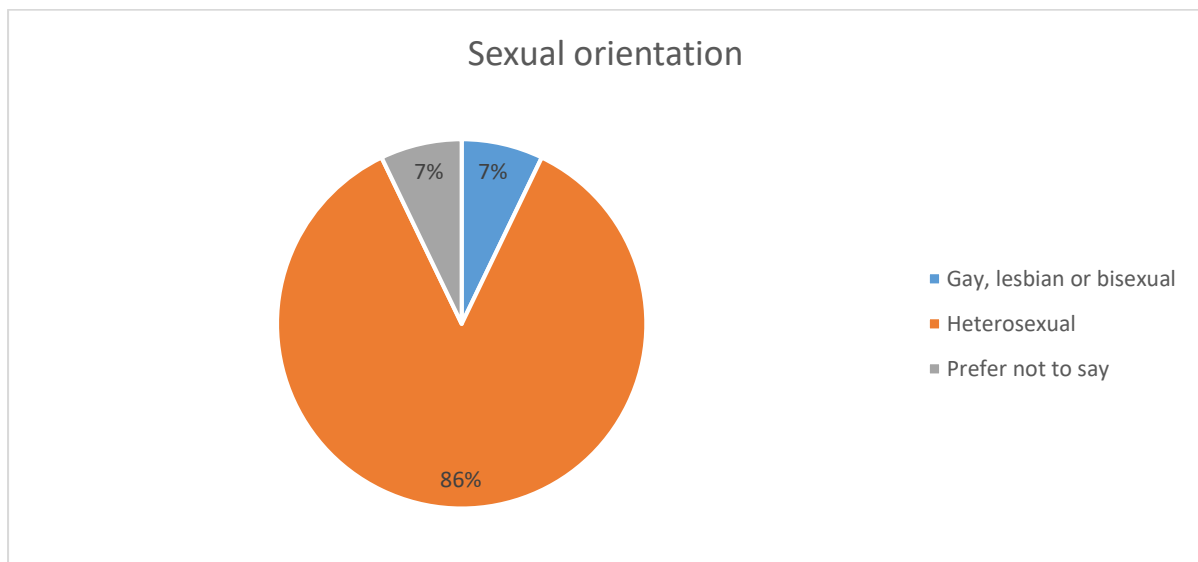
The ethnicity data analysis displayed an overrepresentation of White representors, with 56% identifying as white, compared to 30.8% of Newham's population. This marks an improved reflection on the Regulation 18 consultation, where 54% of representors identified as white. The representation of those identifying as Asian improved significantly, from Regulation 18 to Regulation 19, rising from 20% to 39%, although it is still below the 42.2% share of Newham's population. The data displayed an underrepresentation of Black representors, with 7% identifying as Black as opposed to 17.5% of Newham's population. Finally, none of the representors identified as Mixed or of multiple ethnic groups, and other ethnic groups, accounting for 4.7% and 4.9% of Newham's population, respectively.



**Figure 3.50: Ethnicity**

#### 3.9.4.4 Sexuality

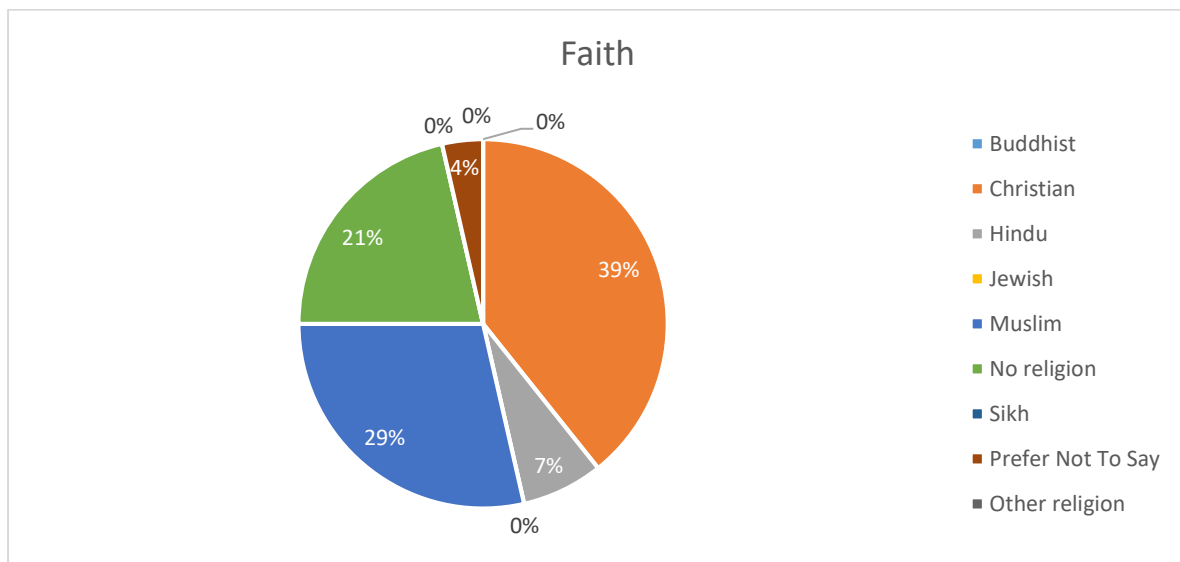
The analysis on sexuality data showed an overrepresentation of representors identifying as Gay, Lesbian or Bisexual. The percentage of representors in this category fell from 8% at Regulation 18 to 7% at Regulation 19, measured against 4% of Newham's population. The data showed those identifying as heterosexual became more representative than at Regulation 18, rising from 77% to 86%, closely aligning with 85% of Newham's population. A reduction in those preferring not to disclose their sexual orientation from 14% to 7% may explain the improvements in representation of sexuality at this consultation.



**Figure 3.51: Sexual orientation**

### 3.9.4.5 Faith

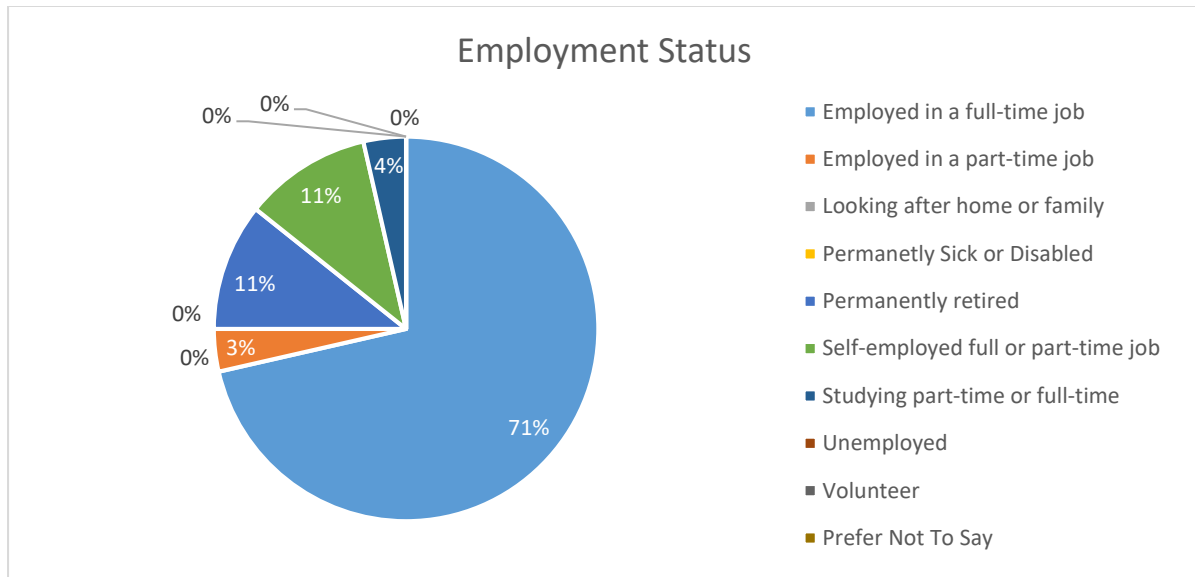
The analysis of the faith data revealed an improvement in the representation of various religious groups. Among those identifying as Muslim, representation rose from 12% during the Regulation 18 consultation to 29% of representors, closing the gap to Newham's population level of 34.8%. Similarly, there was also a reduction of those identifying as having no religion, falling from 35% to 21%, relative to Newham's population at 14.5%. The same applied for those identifying as Hindu which rose from 2% at Regulation 18 to 7% at Regulation 19, aligning more closely with Newham's population at 6.1%.



**Figure 3.52: Religious Beliefs**

### 3.9.4.6 Employment Status

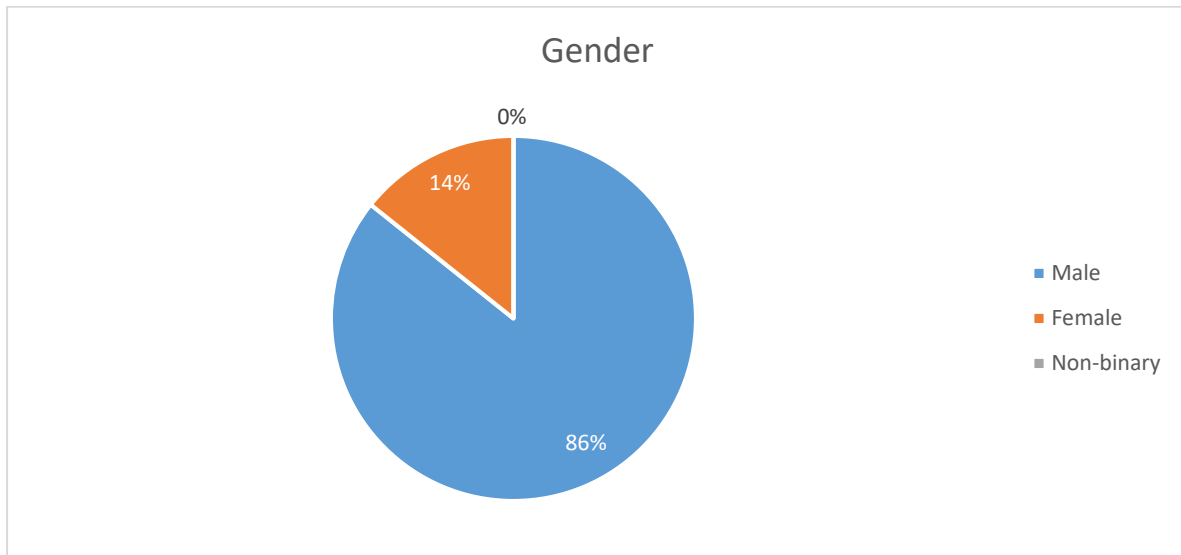
The analysis of employment data on residents aged 16 years and over illustrated an overrepresentation of those in employment, with 85% of representors reporting they are employed, as opposed to 59.2% of Newham's population. Part-time and full-time students were underrepresented, with only 4% of representors, whilst they comprised 13.1% of Newham's population. Additionally, none of the representors reported that they are unemployed, an underrepresentation given that 5% of Newham's population were unemployed.



**Figure 3.53: Employment Status**

### 3.9.4.7 Gender


The analysis of the demographic data found an overrepresentation of male representors, with 86% identifying as Male, as opposed to 49.9% of Newham's population. Women were found to be significantly underrepresented, only accounting for 14% of representors, in comparison to 51% of Newham's population. This notable gender gap is likely attributed to the small sample size of the demographic data. This small sample size was due to a lack of engagement with the equalities survey, which was voluntary, suggesting the data may not be wholly representative of the demographic makeup of the representors in the Regulation 19 consultation.



**Figure 3.54: Gender**

### 3.10 Schedules 8-17

#### Schedule 8: Consultation Launch Email



This email is being sent on behalf of Newham Council's Planning Policy Team.

You are invited to [make representations on the Newham Draft Submission Local Plan](#).

We are pleased to inform you that the Newham Draft Submission Local Plan has been published in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This is the final consultation before the submission of the Local Plan to central government for examination and it is taking place from 19<sup>th</sup> July 2024 to 6<sup>th</sup> September 2024. Representations should be made by 5pm on 6<sup>th</sup> September 2024.

The Newham Local Plan serves as the primary planning document used to assess planning applications and manage areas for regeneration and development in Newham to 2038. The refreshed plan aims to deliver our key objectives: inclusive growth, delivering a fairer Newham and addressing our climate emergency. The Local Plan contains policies on design, high streets, inclusive economy, housing, climate emergency, transport, neighbourhoods, green and water spaces, waste and utilities and social infrastructure as well as 45 site allocations.

The Regulation 19 consultation requires comments to focus on the 'legal compliance' and 'soundness' of the Local Plan and whether we have complied with the Duty to Cooperate. Our [Regulation 19 Consultation Guidance](#) explains what this means in more detail and contains advice on how to write a representation. The Newham Draft Submission Local Plan, the Integrated Impact Assessment, Submission Policies Map and Regulation 18 Consultation Report are available to view on the [council's website](#), [Newham Co-Create](#) and in-person at Newham libraries and Newham Dockside. The full details of where documents can be inspected in [our Statement of Representations Procedure document](#).

To see your responses to the previous consultations and how we have addressed your feedback, you can view our consultation reports for the [Issues and Options](#) and [Regulation 18](#) consultations here.

---

Have your say!

There are many ways you can submit a representation:

- **Online response form:** submit responses using the online response form on Newham Co-create
- **Downloadable response form:** submit responses using the downloadable response form on Newham Co-create and Newham's Regulation 19 consultation webpage and return the downloadable response form by:
  - Email to [localplan@newham.gov.uk](mailto:localplan@newham.gov.uk)
  - Post to the Planning Policy Team, London Borough of Newham, Newham Dockside, 1000 Dockside Road, London E16 2QU.
  - In-person to our drop-in sessions (see below)
- Hard copies of the response form are also available at Newham Libraries and Newham Dockside and can be returned by email or post, using the addresses above.

For further information or to ask any questions, contact us via email [localplan@newham.gov.uk](mailto:localplan@newham.gov.uk), or come to our online informative session or attend one of our drop-in sessions.

Events	Date	Where to go	Information
Online Informative Session	Thursday 25 <sup>th</sup> July 2024 19:00-20:00	Microsoft Teams – Sign up to Eventbrite Event <a href="#">here</a> .	The online informative session will give you an overview of the Newham Draft Submission Local Plan and how to provide responses using the online or downloadable response form. This will be followed by a Q&A with members of the policy team.
Drop-in Session 1	Saturday 27 <sup>th</sup> July 2024 14:00-16:00	East Ham Library, 328 Barking Road, London E6 2RT	The drop-in sessions give you the opportunity to ask the policy team any questions you have on the Newham Draft Submission Local Plan. They will also be able to assist you with submitting a representation.
Drop-in Session 2	Tuesday 30 <sup>th</sup> July 2024 18:30-20:30	Royal Docks Activity Centre, Albert Rd, London E16 2JB	
Drop-in Session 3	Thursday 8 <sup>th</sup> August 2024 10:00-12:00	Canning Town Library, 18 Rathbone Market, London E16 1EH	
Drop-in Session 4	Saturday 10 <sup>th</sup> August 2024 10:00-12:00	Stratford Library, Hopkins Room, 3 The Grove, London E15 1EL	

If you would like to be kept informed on the Local Plan Review, sign up to the Local Plan mailing list [here](#).

Have your say before 5pm on the 6<sup>th</sup> September 2024.

Yours sincerely,  
Ellie Kuper Thomas  
Planning Policy Manager

## Schedule 9: Consultation Extension Email



Dear consultees,

We have received a number of requests for an extension to the consultation period, to provide more time to respond outside of the school summer holiday period. Our consultation timing was directed by the July General Election and local by-elections and the June 2025 deadline for submission of plans under the current planning regime.

In the Government's consultation on revisions to the National Planning Policy Framework, published on the 30<sup>th</sup> July, they announced a proposed change to the submission deadline for plans to progress under the current planning regime from June 2025 to December 2026. As such, we are now in a position to extend our consultation period by 2 weeks to enable more time for consultees to provide responses beyond the summer holiday period.

The new consultation deadline is 5pm on 20<sup>th</sup> September 2024.

Go to [Newham Co-create](#) or [Newham's website](#) to find copies of the Regulation 19 Draft Submission Local Plan and supporting documents. There is also further information on how to respond to the consultation in the [Regulation 19 Consultation Guidance](#) and [Statement of Representations Procedure](#) document.

---

There are many ways you can submit a representation:

- **Online response form:** submit responses using the online response form on [Newham Co-create](#)
- **Downloadable response form:** submit responses using the [downloadable response form](#) on [Newham Co-create](#) and [Newham's Regulation 19 consultation webpage](#) and return the downloadable response form by:
  1. **Email** to [localplan@newham.gov.uk](mailto:localplan@newham.gov.uk)
  2. **Post** to the Planning Policy Team, London Borough of Newham, Newham Dockside, 1000 Dockside Road, London E16 2QU.
- Hard copies of the response form are also available at Newham Libraries and Newham Dockside and can be returned by email or post, using the addresses above.

---

Yours sincerely,

**Ellie Kuper Thomas**  
Planning Policy Manager | Planning and Development  
London Borough of Newham



## Schedule 10: Consultation Final week reminder email

This email is being sent on behalf of **Newham Council's Planning Policy Team**.



**Final opportunity to have your say on the Draft Submission Local Plan!**  
The consultation ends next week on Friday 20<sup>th</sup> September 2024.

Dear consultees,

The Newham Local Plan serves as the primary planning document used to assess planning applications and manage areas for regeneration and development in Newham to 2038. The refreshed plan aims to deliver our key objectives: inclusive growth, delivering a fairer Newham and addressing the climate emergency.

Go to [Newham Co-create](#) and the [Newham website](#) to find copies of the Regulation 19 Draft Submission Local Plan and supporting documents. There is also further information on how to respond to the consultation in the [Regulation 19 Consultation Guidance](#) and [Statement of Representation Procedure](#).

---

There are many ways you can submit a representation:

- **Online response form:** submit responses using the online response form on [Newham Co-create](#)
- **Downloadable response form:** submit responses using the [downloadable response form](#) on [Newham Co-create](#) and [Newham's Regulation 19 consultation webpage](#) and return the downloadable response form by:
  1. Email to [localplan@newham.gov.uk](mailto:localplan@newham.gov.uk)
  2. Post to the Planning Policy Team, London Borough of Newham, Newham Dockside, 1000 Dockside Road, London E16 2QU.
- Hard copies of the response form are also available at Newham Libraries and Newham Dockside and can be returned by email or post, using the addresses above.

---

Over the past 8 weeks, we held 4 drop-in sessions, an online informative session and community events. You can find the recording and slides from the online informative session on our [website](#).

If you would like to be kept informed on the Local Plan Review, sign up to the Local Plan mailing list [here](#). If you have any questions, you can contact us by emailing [localplan@newham.gov.uk](mailto:localplan@newham.gov.uk)

**Have your say before 5pm on Friday 20th September 2024.**

Yours sincerely,

Ellie Kuper Thomas  
Planning Policy Manager | Planning and Development  
London Borough of Newham

## Third Consultation: Draft Submission Local Plan (Regulation 19)

**The Regulation 19 Consultation is now open.** You have until **5pm** on the **6th September 2024** to submit your comments.

This is a consultation on the Newham Draft Submission Local Plan. Due to file size, this has been split into two parts.

- [Part 1 \(Introduction, Vision and Objectives and policies\) \(PDF\)](#)
- [Part 2 \(Neighbourhoods and Appendices\) \(PDF\)](#)

The Local Plan contains the vision, objectives, spatial strategy and planning policy framework which will guide our decisions on development and regeneration in the borough. This is your final opportunity to comment on the Draft Submission Local Plan before we send it to central government for examination.

The Local Plan is also informed by [Evidence Base Documents](#) which have provided research on specific aspects of the Local Plan and by Council and regional strategies and area specific guidance.

Our [Duty to Cooperate Statement \(PDF\)](#) also provides information on how we have engaged with a range of organisations we are required to work with on strategic planning matters

### Regulation 19 requirements

The Regulation 19 consultation requires comments to focus on the 'legal compliance' and 'soundness' of the Local Plan and whether we have complied with Duty to Cooperate. Our [Regulation 19 Consultation Guidance \(PDF\)](#) explains what this means in more detail and contains advice on how to write a representation.

### Local Plan and supporting documents

Read the [Newham Draft Submission Local Plan Part 1 \(Introduction, Vision and Objectives and policies\) \(PDF\)](#) and [Part 2 \(Neighbourhoods and Appendices\) \(PDF\)](#) documents and see our [interactive Policies Map](#) or [Submission Policies Map \(PDF\)](#).

You are recommended to use our [interactive Policies Map](#) which allows you to easily view the Neighbourhoods chapter of the Draft Submission Local Plan. Each neighbourhood policy and site allocation will have a pop up enabling you to view the relevant policies for each neighbourhood and site allocation.

The Draft Submission Local Plan has been informed by the responses to the previous two consultations: Issues & Options (2021) and Regulation 18 (2023). In the previous two consultations you told us what was important to you, the changes you wanted and gave your feedback on our first Draft of our new Local Plan for Newham. To see your responses on the previous consultations you can view our consultation reports for the [Issues and Options](#) and [Regulation 18](#).



## Newham Local Plan Review – Notice of Regulation 19 Consultation

The Newham Local Plan is the primary planning document used to assess planning applications and manage areas for regeneration and development in Newham to 2038. The London Borough of Newham is refreshing the Newham Local Plan to deliver our key objectives: inclusive growth, delivering a fairer Newham and addressing our climate emergency.

Throughout the Local Plan refresh the Council has included the area of the borough where the London Legacy Development Corporation (LLDC) currently develops planning policy and makes decisions on planning applications. Planning powers are due to be handed back to Newham and the other boroughs by December 2024. The Council is working with the LLDC and other partners so that a Plan that covers the whole borough is under preparation at the point of transition. This Local Plan therefore covers the entirety of the London Borough of Newham.

The Draft Submission Newham Local Plan has been published in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This is the final opportunity to have your say on the Draft Local Plan before it is submitted to Government for examination. Your comments can be submitted up until **5pm on 6th September 2024**.

To find out more about the Regulation 19 consultation, view the consultation documents and submit your comments using our online response form go to [newhamco-create.co.uk/en/folders/newham-local-plan-review](https://newhamco-create.co.uk/en/folders/newham-local-plan-review). Alternatively, you can submit your comments using the downloadable response form available on Newham Co-create, or by collecting a hard copy which can be found at Newham libraries and Newham Dockside. The downloadable or hard copy of the response form can be emailed to [localplan@newham.gov.uk](mailto:localplan@newham.gov.uk), or posted to Newham Dockside, 1000 Dockside Road, London E16 2QU. Hard copies of the other consultation documents are available to view at Newham Libraries and Newham Dockside.

If you would like to be kept informed on the Local Plan Review, sign up to the Local Plan mailing list here:

<https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh>

For further information or to ask any questions, contact us via email [localplan@newham.gov.uk](mailto:localplan@newham.gov.uk), or come to one of our events.

Events	Date
Online Informative Session to sign up, go to: <a href="https://newhamco-create.co.uk/en/folders/newham-local-plan-review">newhamco-create.co.uk/en/folders/newham-local-plan-review</a>	Thursday 25th July 2024 19:00-20:00
Drop-in Session East Ham Library	Saturday 27th July 2024 14:00-16:00
Drop-in Session Royal Docks Activity Centre	Tuesday 30th July 2024 18:30-20:30
Drop-in Session Canning Town Library	Thursday 8th August 2024 10:00-12:00
Drop-in Session Stratford Library	Saturday 10th August 2024 10:00-12:00



## Schedule 13: Newham News - Newham Local Plan Final Consultation – Residents Urged to Get Involved

### Newham Local Plan Final Consultation – Residents Urged to Get Involved

Consultation opens 19 July – 6 September 2024

Share on [f](#) [in](#) [X](#)

Newham Council is consulting on the Local Plan which is the key planning document and will be used to shape, plan and manage growth, regeneration and development across the borough to 2038.

The new Local Plan will be used to assess planning applications and guide our decisions on:

- the location, amount and type of development to be delivered in the borough;
- the standards that development should meet;
- what it should look like;
- what services and infrastructure are needed and where;
- how all residents will benefit from the proposed levels of growth and development.

Newham has a young, diverse and growing population; with 351,000 people, it has one of the biggest populations in London and would be the 14th largest city in the country in terms of population. Nearly three quarters (72 percent) of Newham residents are from Black, Asian and ethnically diverse communities. The borough boasts the second youngest age profile in London, with over nine in ten aged under 65.

There are high levels of transport connectivity with Stratford the busiest station in the UK and home to the new Elizabeth Line. Increasingly it is a borough linked to innovation and creativity with hubs like Here East and the Royal Docks, London's only Enterprise Zone.

These factors are being harnessed to address the challenges faced by residents to deliver improvements for all, and create a place where everyone can deliver their potential. The Council's corporate plan, 'Building a Fairer Newham', encapsulates the commitment to residents to do just that.

The Local Plan plays a key part in delivering these commitments. It outlines the important steps being taken to improve and develop the built environment residents live and work in, as Newham builds a fairer, greener and more equal borough.

All residents, businesses and local voluntary, charity and faith groups are urged to engage with the local plan and share their feedback.

This Local Plan includes details for an incredibly ambitious delivery of projects for Newham Residents, including:

- Delivering over 50,000 new homes by 2038
- An affordable housing target on each development of 50 percent social rent
- Allocation land for seven new schools, including two SEND schools, health centres, leisure centres and new parks and play spaces.

This Local Plan has been informed by the responses received on the Issues and Options document, during the consultation held at the end of 2021, and on the draft Local Plan (Regulation 18), during the consultation held in January and February 2022.

This is the final round of consultation before the Local Plan is submitted to Central Government for examination. The Council is keen to encourage as many people as possible to share their views. To find out more about the Local Plan click [here](#) or to take part and attend one of the special Local Plan Events, visit [Newham Co-Create](#) or visit your local library to view the documents.

See a video about the Local Plan and how to get involved [here](#).

You can also find out how to get involved by scanning the QR code below.



Published: 24 Jul 2024



# Help shape Newham

Newham's Local Plan is the Council's key planning document used to assess planning applications as well as plan for regeneration and development. We are inviting you to have your say.

Our Draft Local Plan (Regulation 19), which is at consultation stage until the 6 September, sets out our long-term vision and strategy for inclusive growth, regeneration and development across the borough to 2038, including delivering over 50,000 new homes. It will deliver an affordable housing target on each development of 50% social rent, subject to viability. This is about providing for the homes we need, but also setting our place vision for how we want the borough, our town centres and neighbourhoods, to grow and thrive for the benefit of those who live, work, study and visit Newham.

The refreshed plan aims to deliver our key objectives: inclusive growth, delivering a fairer Newham and addressing our climate emergency. The Local Plan includes policies on: design, high streets, inclusive economy, housing, climate, transport, neighbourhoods and social infrastructure. The plan also includes details of 45 site allocations.

This is our final round of consultation before the Local Plan is submitted to Central Government for examination. Find out how to have your say and attend one of our events by visiting Newham Co-Create, simply scan the QR code below, or visit your local library to view the documents.



Have your say before 5pm on 6 September 2024 [localplan@newham.gov.uk](mailto:localplan@newham.gov.uk)  
[newham.gov.uk/LocalPlanReview](https://newham.gov.uk/LocalPlanReview)



# OUR NEWHAM LOCAL PLAN



**GET INVOLVED IN SHAPING THE FUTURE OF NEWHAM TOGETHER.**

The Local Plan is the key planning document used to assess planning applications and plan for regeneration and development in Newham.

This is your **final opportunity** to comment on the **Submission Draft Newham Local Plan** before we send it to central government for **examination**.

**Find out more** about this round of consultation and how to **have your say**.



**Online**  
Go online to our Local Plan consultation pages on Newham Co-Create.



**At our libraries**  
Visit your local library or the Dockside council offices to find hard copies of the Local Plan.



**Come to one of our events**  
Attend one of our consultation events find out more from the planning policy team.

Upcoming Events	Date
<b>Drop-in Session</b> Royal Docks Activity Centre, Albert Rd, London E16 2JB	Tuesday 30th July 2024 6.30-8.30pm
<b>Drop in Session</b> Canning Town Library, 18 Rathbone Market, London E16 1EH	Thursday 8th August 2024 10am-12pm
<b>Drop in Session</b> Stratford Library, Hopkins Room, 3 The Grove, London E15 1EL	Saturday 10th August 2024 10am-12pm

Read our guide to this consultation on Newham Co-Create by scanning the QR code or find a copy at your local library.

**Have your say  
before 5pm  
6 September  
2024!**



**#NewhamLocalPlan**  
**localplan@newham.gov.uk**

**newham.gov.uk**

**WE ARE NEWHAM.**



## Our Newham Local Plan: BUILDING A FAIRER NEWHAM

Main Changes from the Draft (Regulation 18) to the Draft Submission (Regulation 19) Newham Local Plan



### Open Space and Infrastructure Requirements BFN1: Spatial Strategy

New policy requirements to deliver different types of social infrastructure and open space, play space and food growing space have been added to site allocations.

This change has been made following recommendations from the completed Built Leisure Needs Assessment (2024) and Green and Water Infrastructure Strategy (2024); information from the NHS and analysis of the Community Facilities Needs Assessment (2022) which highlighted the need for different types of green and social infrastructure across the borough. We consider this change necessary to meet the Local Plan's objective to deliver improved access to open space and social infrastructure for existing and future residents.

### Well-connected neighbourhoods BFN1: Spatial Strategy

Further information regarding the delivery of 15 minute neighbourhoods has been added to the justification text for policy BFN1 to better explain that the purpose of 15 minute neighbourhood principles is to increase choice and the range of facilities residents can access. To better reflect the intentions behind this objective, this principle is now referred to as a network of well-connected neighbourhoods, in the Local Plan.

This change has been made following representations received from a number of residents expressing concerns relating to 15 minute neighbourhoods and its implementation. In particular, concerns that this approach was designed to reduce freedom of movement or limit choice. We consider that this change was necessary to provide further clarity and reassurance to residents.

### Meanwhile uses BFN2: Co-designed masterplanning

A number of different policy requirements regarding meanwhile uses across the Plan have been consolidated into a single policy. The new policy also outlines how speculative meanwhile use applications will be assessed, with more flexibility on the types and locations of uses allowed if the uses are proposed for 5 years or fewer. Longer term meanwhile uses are expected to comply with relevant policies in the Plan.

This change has been made following representations received from developers and the Royal Docks Team who raised questions about the Plan's general support for meanwhile uses. We consider that this change enables a suitable balance between the benefits of meanwhile uses and the need to maintain the Plan's spatial strategy.



## Our Newham Local Plan: BUILDING A FAIRER NEWHAM

Main Changes from the Draft (Regulation 18) to the Draft Submission (Regulation 19) Newham Local Plan

### Social Value and Health Impact Assessment BFN3: Health Impact Assessment – delivering social value, health and wellbeing

This policy has been refined to provide greater clarity on the approach to a Social Value and Health Impact Assessment (SV-HIA). In addition, a SV-HIA Guidance Note (which includes a screening tool and check list) has been developed to support the implementation of the policy. Newham's SV-HIA Guidance Note explains the purpose of a SV-HIA, sets out why health and social value matter in Newham, provides information on when and how SV-HIAs should be prepared and what they should contain.

Whilst there was broad support for this policy from residents, a neighbouring borough, developers and one community group this change has been made following a representation from one developer who asked for further guidance on the scope and requirements of the SV-HIA. We considered that this change was necessary to provide further clarity on what a SV-HIA is and to make sure the policy is being used correctly. In doing so, the policy will help to support the delivery of a built and natural environment that delivers social value for Newham residents and supports their good physical and mental health, and social wellbeing.



### Prioritisation of affordable housing relative to infrastructure BFN4: Developer contributions and infrastructure delivery

The Plan's viability hierarchy remains unchanged, with the delivery of social housing remaining the top priority. However flexibility has been introduced to allow the Council the possibility to prioritise the delivery of strategic infrastructure when required by internal or external providers.

This change has been made following representations received from Sports England, the Environment Agency and Transport for London who raised concerns regarding the planning obligation hierarchy not supporting the delivery of needed infrastructure. A number of residents also raised the importance of sufficient infrastructure to support growth in homes and population. We consider that this change enables suitable flexibility to deliver necessary infrastructure, in particular when alternative sources of funding are not available, without reducing the focus on much needed social housing delivery.



Submit your comments online, by email, by post or in-person at our drop-in sessions. Find out more by scanning the QR code or by visiting your local library.



**Have your say before  
5pm, 6 September 2024!**



## Schedule 17: Comments and Responses Tables

The [comments and responses tables](#) are provided alongside this consultation report, broken down by chapters of the Local Plan. These tables display all of the comments submitted as part of the Local Plan Regulation 19 consultation and our responses. See the appendices below:

- General Comments
- Vision and Objectives Comments
- Building a Fairer Newham Comments
- Design Comments
- High Streets Comments
- Social Infrastructure Comments
- Inclusive Economy Comments
- Homes Comments
- Green and Water Spaces Comments
- Climate Emergency Comments
- Transport Comments
- Waste and Utilities Comments
- Neighbourhoods Comments
- Glossary Comments